

# Amended FY2015 Moving To Work Annual Plan



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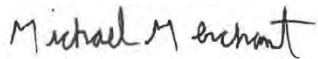
## **Message from CEO**

Throughout my first year as the Chicago Housing Authority's Chief Executive Officer, I have made it a priority to implement CHA's strategic plan, *Plan Forward: Communities that Work*. I have charged my staff to develop data-driven policies and innovative programming to meet Plan Forward's objectives. By doing so, CHA will work with the agency's key partners to bring forth vibrant communities and help CHA's families toward self-sufficiency.

I am pleased to present CHA's FY2015 Moving to Work (MTW) Annual Plan. As part of *Plan Forward*, the agency proposes key initiatives including the continued development of a uniform housing policy, unit delivery toward the goal of 25,000 housing units, and offering housing programs to support local preferences.

CHA's MTW Annual Plan also outlines planned redevelopment activities at several CHA developments. Through the flexibilities of the U.S. Department of Housing and Urban Development's MTW program, CHA will continue to propose and implement MTW activities to support ongoing revitalization efforts and *Plan Forward* initiatives.

I want to thank Mayor Rahm Emanuel for his continued support of the agency and sharing his vision of creating vibrant communities through safe and affordable housing. I am also grateful for CHA's key stakeholders, including CHA's Board of Commissioners, CHA residents, resident leadership, development partners and community organizations, all of whom continually bring valuable perspectives to the work of the agency. I am eager and focused on the good work ahead of us in the coming year. Thank you for your interest in the Chicago Housing Authority.



Michael Merchant  
Chief Executive Officer  
Chicago Housing Authority

**Table of Contents**

Section I: Introduction.....6

Section II: General Housing Authority Operating Information ..... 14

Section III: Proposed MTW Activities: HUD Approval Requested ..... 32

Section IV: Approved MTW Activities: HUD Approval Previously Granted ..... 36

Section V: MTW Sources and Uses Funds..... 72

Section VI: Administrative..... 80

Appendices ..... 210

*CHA Local Asset Management Plan* ..... 210

*CHA - Affirmatively Furthering Fair Housing*..... 212

*Rental Assistance Demonstration Program*..... 214

*Certification of Consistency with Consolidated Plan* ..... 220

*Certification for a Drug-Free Workplace* ..... 221







**Section One**  
**Introduction**



## **Section I: Introduction**

### **Overview of CHA's MTW Goals and Objectives**

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. CHA and HUD signed the original Moving To Work (MTW) Agreement on February 6, 2000 which allowed CHA to implement the original Plan for Transformation. CHA's Amended and Restated MTW Agreement with HUD was fully executed on June 26, 2008 which extended CHA's participation in the MTW Demonstration Program through FY2018.

In April 2013, Mayor Rahm Emanuel and 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 work moving forward. 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. As CHA implements Plan Forward initiatives, the agency will continue to pursue the three statutory objectives of the MTW Demonstration Program:

- **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.

As part of the MTW Agreement, CHA must submit an annual plan to HUD no later than 75 days prior to the start of the fiscal year. In May 2013, HUD issued a revised Form 50900 (Attachment B to the MTW Agreement) which outlines new requirements for the content of MTW annual plans/reports and for tracking the impact of MTW activities. CHA's FY2015 MTW Annual Plan is the first annual plan based on these changes, and, as required, CHA has fully adopted the new Form 50900 for all elements of the annual plan. CHA continues to work with HUD for technical guidance and feedback on MTW reporting processes and requirements to ensure compliance.

The following sections summarize CHA's key MTW goals and initiatives.

### **Key Plan Forward Initiatives**

Throughout FY2015, CHA will continue to pursue and/or plan for future implementation of the following Plan Forward initiatives.

#### ***CHA Unit Delivery Strategy and Progress toward Goal of 25,000 Housing Units***

CHA continues to pursue a variety of unit delivery strategies to achieve the original Plan for Transformation goal of rehabilitating or replacing 25,000 units of affordable housing in Chicago and to fulfill the obligations of CHA's MTW Agreement with HUD.

- **Mixed-Income Redevelopment:** CHA will continue with new on- and off-site phases in mixed-income developments which have replaced many former CHA properties.
- **Real Estate Acquisition Program (REAP):** CHA launched a new strategy for acquisition of public housing units, primarily in opportunity areas. In addition, CHA released a Request for Qualifications (RFQ) to solicit a pool of developers interested in partnering with CHA.

- Property Rental Assistance (PRA) Program: CHA will continue to expand the existing PRA program to provide new project-based voucher units through multi-year contracts with private owners and developers.
- Preservation Strategies: CHA plans to support local preservation strategies through CHA's PRA Program. Specifically, this strategy applies to existing non-CHA properties with expiring affordability restrictions for which CHA can ensure long-term affordability through the use of project-based vouchers. Proposals would be subject to CHA's standard PRA selection process.
- Rehabilitation: CHA plans to rehabilitate a portion of remaining offline units at Altgeld Gardens.
- Sponsor-Based Housing Program: CHA proposed a new sponsor-based housing program to contribute to HUD's Designated Opportunities to End Homelessness and Chicago's Plan to End Homelessness 2.0 initiatives. CHA will implement the program through the use of project-based vouchers and within standard regulations and processes for project-based vouchers.
- Choose To Own Homeownership Program: CHA facilitates homeownership opportunities for CHA families through long-term subsidy commitments. CHA will request HUD approval, through a proposed amendment to CHA's MTW Agreement, to count these units toward the 25,000 goal.
- Conversion of Moderate Rehabilitation Properties: CHA is assessing existing privately-owned CHA Moderate Rehabilitation program properties to identify opportunities for possible conversion to project-based vouchers through the PRA program.
- Other Initiatives: New *Plan Forward* initiatives are being developed to respond to local housing preferences and market opportunities.

During FY2015, CHA will continue to make progress toward the 25,000 unit goal of the original Plan. CHA plans to deliver an additional 1,040 in FY2015, for an overall total of 23,141 housing units or 93% of the overall unit delivery goal.<sup>1</sup> (Please refer to Section II and IV for more information.)

Projected FY2015 Unit Delivery

IL Number	Type	Development/Program	Projected FY2015 Unit Delivery
IL002160000	Mixed-Income Housing Redevelopment	Park Boulevard IIB	37
IL002163000		Gwendolyn Place/Legends South Phase C3	21
IL002164000		Parkside of Old Town Phase IIB	36
TBD	Public Housing Acquisition	Real Estate Acquisition Program (REAP)	25
N/A	Property Rental Assistance Program	Project-Based Vouchers	203
N/A	Preservation Strategies	Project-Based Vouchers	150
IL002002000	Family Housing Rehabilitation	Altgeld Gardens	218
N/A	Sponsor-Based Housing	Project-Based Vouchers	350
<b>Total Housing Units</b>			<b>1,040</b>

### 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

<sup>1</sup> 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 capital maintenance. 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.

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 requirements, standards, and processes for the two housing programs, including establishing consistent policies where possible, to streamline and clarify program administration and to make policies more user-friendly for participants. CHA will implement the Uniform Housing Policy through a multi-phased approach.

In FY2014, CHA moved forward with Phase 1 of Uniform Housing Policy, prioritizing policies that benefit participants and enhance consistency across programs. CHA received approval for several policies that require MTW authority, including expanding biennial recertification to public housing (which was previously approved for HCV), adopting triennial recertification for fixed-income households with only senior/disabled participants in public housing and HCV, and modifying “Choose to Own” homeownership and Family Self Sufficiency program requirements. In addition, CHA made changes to additional policies related to HCV unit inspection owner participation, clarification of waitlist priorities, clarification of definitions of absent participants, guests and unauthorized members, and adoption of smoke-free housing policies for all new properties. Updates to CHA’s Public Housing Admissions and Continued Occupancy Policy (ACOP), Public Housing Residential Lease and HCV Administrative Plan, based on Phase 1 of Uniform Housing Policy, were released for public comment in July 2014 and were approved by CHA’s Board in August 2014. Implementation of Phase 1 will be ongoing throughout FY2015.

In FY2015, CHA plans to propose Phase 2 of Uniform Housing Policy, which will explore changes to streamline rent and utility allowance structures in public housing and HCV as well as strategies to encourage work and self-sufficiency. CHA will conduct impact analyses and engage in numerous efforts for resident and stakeholder communication. CHA anticipates requesting MTW approval for Phase 2 of Uniform Housing Policy through a future proposed amendment to the FY2015 MTW Annual Plan.

### ***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.

In the submitted portfolio application, CHA has elected to transition the proposed RAD units to the Project-Based Voucher program. In anticipation of a potential future RAD award, CHA proceeded with required revisions to the annual plan through an amendment to the FY2014 MTW Annual Plan. In FY2014, CHA updated the HCV Administrative Plan to reflect RAD-specific policies, as well as created a RAD lease/lease addendum and RAD grievance procedures. These RAD policies were released for public comment in November 2014 and approved by CHA’s Board in January 2015. As reflected in these policies, 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.

In June 2015, CHA received a RAD award for its portfolio application. CHA is amending the FY2015 MTW Annual Plan to include 17 additional developments (13 AMPS). Further details on the RAD program and updated information are included in the Appendices. These developments are included in CHA’s RAD portfolio application but were previously designated as part of a second phase of conversion. CHA is now moving forward to have these transactions ready for potential Phase One conversions if needed to replace other planned Phase One developments. CHA is required to convert 50 percent of its portfolio application within one year of receiving the

CHAP awards and the ability to use one or all of these properties as replacements will allow CHA to meet that requirement. (See *RAD appendix for more information.*)

### ***Housing Programs 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. In FY2015, CHA will explore implementing a proposed Sponsor-Based Voucher Program, utilizing project-based vouchers, to support these initiatives. (*Please refer to Section II for more information.*)

### **Proposed MTW Activities in FY2015**

In FY2015, CHA is proposing the following MTW activity.

- *Expedited Public Housing Acquisition Process (2015-01)*: CHA is proposing to use MTW flexibility to support CHA's Real Estate Acquisition Program and to expedite the acquisition of units and/or buildings as public housing units.

### **Approved MTW Activities in FY2015**

In FY2015, CHA will continue or proceed with implementation of the following approved 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.

### ***Housing/Development***

- *Revitalization of 25,000 Housing Units (2000-01)*: CHA continues to make progress toward the goal of 25,000 housing units and providing additional housing opportunities for residents.
- *Reasonable Cost Formula and Methodologies for Redevelopment and Rehabilitation (2010-01)*: Through an amendment to the FY2014 MTW Annual Plan, CHA received approval to utilize the reasonable cost formula for redevelopment, which was approved in FY2010, for both redevelopment and rehabilitation projects.

### ***Public Housing and HCV Programs/Uniform Housing Policy***

- *\$75 Minimum Rent for Public Housing and HCV Programs (2009-01)*: CHA increased the minimum rent from \$50 to \$75 in FY2009 in public housing and HCV programs. The impact of the revised minimum rent level is an increase in rent revenue from residents paying the minimum rent.
- *Biennial Re-examinations for HCV (2006-01) and Public Housing (2014-03)*: CHA continues to conduct biennial re-examinations for HCV Program participants. In FY2014, CHA received HUD approval to expand biennial re-examinations to eligible public housing households.
- *Triennial Re-examinations for Households with Only Elderly/Disabled Participants for HCV and Public Housing (2014-02)*: CHA received HUD approval in FY2014 to implement a streamlined triennial re-examination schedule for public housing and HCV fixed income households consisting of only disabled and/or elderly participants.
- *Choose to Own Homeownership Program for HCV and Public Housing (2011-01)*: CHA expanded the HCV Choose to Own Homeownership Program to eligible current public housing residents. In FY2014, CHA received approval to modify program eligibility requirements to promote participant success.



- *Family Self-Sufficiency Program for HCV and Public Housing: (2014-01)*: CHA received approval in FY2014 to modify participation requirements for the Family Self-Sufficiency program for public housing and HCV participants to promote participant success.
- *CHA Re-entry Pilot Program (2014-04)*: Through an amendment to the FY2014 MTW Annual Plan, CHA received HUD approval to implement a Re-entry Pilot Program for up to 50 eligible participants in CHA traditional public housing or CHA's HCV Program.

### ***Public Housing***

- *Public Housing Work Requirement (2009-02)*: 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 (2008-01)*: 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 (2010-02)*: CHA is authorized 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. In FY2014, CHA has lowered the limit for exception payment standards to no more than 150% of HUD FMR for all new requests and will phase out of existing exception payments that exceed 150% over the next three years.
- *Owner Excellence –Acceptance of Passed Annual or Initial HQS Inspection for New Request for Tenancy Approval within 90 Days of Passed Date (2011-02)*: 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 eligible owners, with qualifying units, participating in the Owner Excellence Program.
- *Owner Excellence – Vacancy Payments (2011-03)*: As part of the HCV Owner Excellence Program, CHA may provide a modest vacancy payment to eligible owners, with qualifying units, participating in the Owner Excellence Program who re-lease such a unit currently in the HCV program to another HCV participant.

### ***Property Rental Assistance/Project-Based Voucher Program***

- *Exceed the Limit of 25% Project-Based Voucher (PBV) Assistance in Family Properties (2008-02)*: CHA may increase the percent of assisted PBV units in family properties above the regulatory limit of 25% per family building.
- *Authorization of Qualified PRA Owners/Property Managers to Perform Initial Eligibility Determinations and Reexaminations (2011-04)*: CHA allows qualified owners, as defined by CHA, to perform initial eligibility determinations and re-examinations of participants in the PRA Program.
- *PBV Contract Commitments with 16-30 Year Initial Terms (2011-05)*: 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 (2011-06): 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 (2011-07): 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 (2011-08): 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, in FY2015, 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 services and programs for residents. *(Please refer to Section V for more info.)*





**Section Two**  
**General Housing Authority Operating Information**



## Section II: General Housing Authority Operating Information

This section contains General Housing Authority Operating Information for CHA's public housing portfolio and Housing Choice Voucher (HCV) Program, including Housing Stock, Leasing, and Wait List information.

### Section II-A: Housing Stock Information

#### Planned New Public Housing in FY2015

The following table summarizes planned new public housing units in FY2015.

Planned New Public Housing Units to be Added During FY2015

AMP Name and Number	Bedroom Size							Total Units	Population Type	Fully Accessible	Adaptable
	0	1	2	3	4	5	6+				
IL002160000 Park Boulevard Phase IIB	0	14	12	9	2	0	0	37	General	2	7
IL002163000 Gwendolyn Place/ Legends South Phase C3	0	7	6	5	3	0	0	21	General	2	7
IL002164000 Parkside of Old Town Phase IIB	0	21	6	8	1	0	0	36	General	3	5
PIC /AMP - TBD REAP Units	0	10	10	5	0	0	0	25	General	2	1
Total Public Housing Units to be Added								119			

#### Overview of New Public Housing Units in FY2015

##### Park Boulevard IIB (IL002160000)

CHA plans to deliver 37 public housing units in FY2015 as part of Phase IIB of the Park Boulevard mixed-income community. Park Boulevard IIB represents the fourth overall redevelopment phase at former Stateway Gardens site and second phase of the Stateway HOPE VI redevelopment grant. The development will provide a total of 108 new rental units: 37 public housing, 34 affordable and 37 market rate units. Of the 37 public housing units, two will be fully accessible and 7 will be adaptable. Phase IIB also includes commercial space in a building on the east side of State Street. The financial transaction closed on December 24, 2013 and the developer began construction in January 2014. All unit delivery is planned for FY2015.

##### Gwendolyn Place –Legends South Phase C3 (IL002163000)

CHA plans to deliver 21 public housing units in FY2015 located on fourteen scattered sites as part of the off-site redevelopment of Legends South (former Robert Taylor Homes). Legends South Phase C3, also named Gwendolyn Place, is the fifth rental sub-phase for the Legends South redevelopment effort. The development will include a total of 71 new rental units: 30 public housing, 23 affordable and 18 market rate units. CHA anticipates the initial nine public housing units will deliver in FY2014. Of the 30 public housing units, two will be fully accessible and twelve will



be adaptable. A management office and small ground floor commercial space are also included in this phase. The financial transaction closed on February 28, 2014, and the developer began construction in March 2014. All unit delivery is planned for FY2015.

*Parkside IIB Rental (IL002164000)*

CHA plans to deliver 36 public housing units in FY2015 in Phase IIB of the Parkside of Old Town mixed income community, as part of the redevelopment of the former Cabrini Extension North site. This phase will include a total of 106 rental units, including 36 public housing, 27 affordable and 43 market rate units. Of the 36 public housing units, three will be fully accessible and five will be adaptable. Parkside Phase IIB will also include an exercise room and a community room of approximately 1,214 square feet. The financial transaction closed on June 25, 2014 and the developer began construction in July 2014. All unit delivery is planned for FY2015.

*Real Estate Acquisition Program (IL#s to be assigned upon acquisition)*

CHA launched the Real Estate Acquisition Program (REAP) in FY2013 as a strategy for offsite acquisitions of public housing units using standard public housing acquisition processes primarily in CHA-designated Opportunity and Gautreaux-designated General Areas. . CHA plans to deliver 25 public housing units in FY2015 through the Real Estate Acquisition Program.

*Altgeld Gardens/Phillip Murray Homes (IL002002000)*

CHA continues to work with stakeholders to finalize the master plan for the Altgeld-Murray community, including residential and community facility components. In FY2015, CHA plans to continue the ongoing Section 106 historic preservation process and to begin implementation of the final plan for this community. Pending finalization of plans, CHA anticipates completing the first phase of rehabilitation of approximately 218 units at Altgeld Gardens in FY2015.

*Planned Public Housing to be Removed in FY2015*

In FY2015, CHA plans to demolish the following dwelling and non-dwelling public housing units.

***Dwelling Demolition***

*Altgeld Gardens/Phillip Murray Homes (IL002002000)*

In FY2013, CHA completed a master planning process and presented a *Preferred Design Concept* site plan to Altgeld/Murray residents and members of the surrounding community at a September 2013 Town Hall meeting. The proposed site plan included the rehabilitation of offline units and existing community buildings, demolition of offline units at Murray Homes and construction of new community buildings and recreational areas. CHA also began the Section 106 historic preservation review process of the proposed site-plan in FY2013. In FY2014, CHA received approval from the Illinois Historic Preservation Agency (IHPA) to proceed with rehabilitation of units in offline blocks 7 & 8, as well as approval to begin renovating vacant office space in the Carver Park Fieldhouse that will house the new offices of the property manager and on-site social service provider. IHPA provided additional comments on the proposed site plan. CHA will host a resident meeting in early 3<sup>rd</sup> quarter 2015 to present a revised concept plan which reflects feedback received by the residents and Consulting Parties during the Section 106 review process.

In FY2015, CHA plans to move forward with the demolition of offline units in blocks 15 and 16 of Murray Homes.

**Planned Public Housing Units to be Removed During FY2015**

PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
IL002002000 Altgeld Gardens/ Phillip Murray Homes	182	CHA anticipates demolition of offline units in Murray Homes (Blocks 15 and 16) as part of the redevelopment of the Altgeld-Murray community.
<b>Total Number of Units to be Removed</b>	182	

***Non-Dwelling Demolition***

CHA does not anticipate any non-dwelling demolition in FY2015.

**Project-Based Voucher Utilization in FY2015**

CHA has continued to expand the use of project-based vouchers (PBVs) since FY2001 to increase housing options for low-income families in the region. PBVs are issued directly to property owners, unlike tenant-based vouchers, and remain with the unit if a tenant moves out. CHA anticipates that 3,727 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 FY2015. This includes 3,541 total PBV units under HAP contract and 186 under AHAP.

***New Housing Choice Vouchers to be Project-Based in FY2015***

The following table provides an overview of new project based-vouchers planned to be under HAP in FY2015.

Property Name	FY2015 Anticipated Number of New Vouchers to be Project-Based	Description of Project
Montclare Senior	38	New Construction in Avalon Park Community Area. The site will serve Seniors.
Illinois Accessible Housing Initiative Phase 2	11	Moderate Rehab to perform ADA retrofits to serve people with physical disabilities. Seven buildings located in Lakeview, Hyde Park, Edgewater, Bridgeport, Uptown and New City.
West Humboldt Place	4	New Construction in Humboldt Park for disabled families.
Access Housing	20	Scattered site new construction and rehabilitation in Logan Square, Hermosa and West Town for people with disabilities.
Veterans New Beginnings	48	New Construction in Auburn Gresham for Veterans.
Milwaukee Avenue Apartments	11	New Construction in Avondale for disabled families.
Mercy Uptown	50	Rehabilitation of two existing developments in Lakeview and Uptown.
Princeton Park	21	Existing housing in Roseland. The development will serve working families.
Kenmore Plaza Apartments (Preservation)	150	Existing senior development in Edgewater.
Sponsor-Based Voucher Program	350	CHA is exploring implementation of a sponsor-based PBV program in FY2015.
<b>Anticipated Total New Vouchers to be Project-Based</b>	<b>703</b>	

**Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year (under HAP Contract)**

**3,541**

**Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year**

**3,255**

Throughout FY2015, 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 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.

The following section provides an overview of CHA's project-based voucher initiatives through the Property Rental Assistance (PRA) Program.

#### City/State PBVs

CHA continues to administer 341 PBV units across three city-state sites: Harrison Courts, Loomis Courts, and Lathrop Elderly. These 341 PBV units are located in Chicago and counted toward overall unit delivery progress.

#### PRA Supportive Housing

Through the PRA Program, CHA provides supportive housing units through partnerships with developers/owners and service providers who provide affordable housing for families and individuals in need of comprehensive supportive services. 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 FY2015, CHA expects an additional 94 new supportive PBV units under HAP contracts to be counted toward unit delivery. By the end of FY2015, CHA anticipates a total of for a total of 1,334 supportive housing (non-RHI) PBV units counted toward overall unit delivery by the end of FY2015.

#### Family & Senior (Non-supportive) PRA Housing

CHA provides high-quality affordable housing opportunities to families, seniors and individuals on CHA's waiting lists by providing PBV rental subsidies in non-supportive housing properties under the PRA program.

This category also includes unit delivery Preservation Strategies for existing non-CHA properties with expiring affordability restrictions. Through this strategy, CHA will review proposals received through the standard PRA selection process and, if selected, CHA would ensure long-term affordability through the use of project-based vouchers.

In FY2015, 259 non-supportive family/senior PBV units are expected to be placed under HAP contracts, for a total of 1,358 non-supportive family/senior housing (non-RHI) PBV units counted toward overall unit delivery by the end of FY2015.

#### 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.<sup>[1]</sup>

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<sup>[1]</sup> For more information on RHI, see MPC's website at [www.metroplanning.org](http://www.metroplanning.org).

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 FY2015, CHA intends to maintain its participation in the RHI Pilot Program in order to offer applicants on CHA's wait list broader housing alternatives in opportunity areas.

In FY2015, CHA expects no new additional RHI PBV units. By the end of 2015, a total of 158 CHA PBV units are expected to be under HAP contracts in the region through RHI. Of these, 69 are under contract in Chicago and are counted toward unit delivery progress.

#### CHA Sponsor-Based Voucher Program

CHA is exploring implementation of a sponsor-based voucher program utilizing up to 350 project-based vouchers through the Property Rental Assistance program in FY2015. This program will enable CHA to contribute to HUD's goal to end chronic homelessness and the City of Chicago's Plan to End Homelessness 2.0. Through this program, sponsoring agencies would apply for Housing Assistance Payment (HAP) subsidies from CHA to "master lease" units from private property owners for a term of 5-7 years. The "Sponsor Agency" would then sublease units to program participants. Each agency would be required to provide social services for participants and meet the following criteria as evidenced through an open and competitive application/evaluation process.

- Experience operating other similar leasing models including CHA's Property Rental Assistance (PRA) project-based vouchers, HUD's Supportive Housing Program, the Chicago Low Income Housing Trust Fund, or comparable housing models.
- Capacity to administer a minimum of ten and a maximum of fifty vouchers.
- Feasibility to obtain a master lease for the units with a property owner for the duration of 5-7 years and execute a lease agreement with eligible participants. (Participants may change throughout the duration of the master lease.)
- Committed social service funding and experience to provide services throughout the duration of the HAP contract and master lease.
- While the While the Sponsor Based Voucher program will be similar to PRA and follow standard project-based voucher regulations, it will have a separate application with a different set of evaluation criteria to account for the focus on social services.

As is standard for participants in CHA's existing PRA Program and allowable under standard regulations, sponsor agencies will propose and manage tenant selection, based on CHA-approved policies and priorities. CHA will prioritize sponsor-based vouchers for 0 and 1 bedroom units, which are most effective in addressing the needs of the homeless population and are aligned with HUD and City priorities. Other unit sizes will be consider through the application process. CHA will manage unit inspections according to existing policies for the HCV/PRA Program.

Participants would be assessed to determine whether transitioning to other housing using a tenant based voucher without social services is appropriate, subject to availability of tenant based vouchers. This would allow vacated sponsored units to become available for the next available participant.

Sponsor-based program policies will become part of the HCV Administrative Plan, and these policies will be released for public comment in the future. Sponsor agency proposals for targeted populations outside of CHA's general wait list parameters will be subject to CHA Board Approval.



Summary of PRA/PBV Units Counted Toward Overall Unit Delivery Progress

In FY2015, CHA projects a total of 703 new PBV units under HAP contracts in Chicago to be counted toward unit delivery, including 94 supportive housing units and 259 non-supportive family/senior housing units (of which 150 units will be preserved as PBV units), and 350 PBV units through the sponsor-based program in FY2015.

By the end of FY2015, CHA expects to have a total of 3,452 PBV units in Chicago counted toward unit delivery progress.

Other Changes to the Housing Stock Planned in FY2015

The following section describes planned changes to CHA's housing stock during FY2015 by category, including Disposition Activity, Long-term Plan for Offline Units, Additional Capital Maintenance Activity and Additional Redevelopment Activity.

Other Changes to the Housing Stock Planned in FY2015							
<b>Planned Disposition Activity</b>							
CHA plans to dispose of vacant land for future development of Park Boulevard, the former LeClaire Courts Extension land and the Near North area. CHA will also dispose of former scattered site vacant land.							
<b>Long-term Plan for Offline Units Status</b>							
As of the 3 <sup>rd</sup> quarter of FY2014, CHA has 2,881 public housing units across several categories 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.							
<b>Additional Planned Capital Maintenance Activity</b>							
CHA will continue or begin various capital maintenance projects in FY2015.							
<b>Additional Planned Redevelopment Activity</b>							
CHA will continue redevelopment planning at several sites and anticipates several financial transaction closings in FY2015.							

**Planned Disposition Activity**

The following disposition activity is planned for FY2015. Other disposition activity previously included in the FY2013 or FY2014 Annual Plan may be carried out in FY2015.

IL Number	Development/ Site	Northern Boundary	Southern Boundary	Eastern Boundary	Western Boundary	Type of Disposition	Type of Property/ Purpose of Disposition
TBD	Park Boulevard (former Stateway Gardens)	36 <sup>th</sup> St.	37 <sup>th</sup> Place	State St.	Federal St./ Chicago Rock island & Pacific R.R. R.O.W.	Fee Simple / Ground lease	CHA plans for the disposition of vacant land for the development of mixed-income housing, retail or other land uses.
IL002024000	LeClaire Courts Extension	West 44 <sup>th</sup> Street	West 45 <sup>th</sup> Street	South Cicero Avenue	South Lavergne 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 and other land uses.

## Section II: General Housing Authority Operating Information

IL Number	Development/ Site	Northern Boundary	Southern Boundary	Eastern Boundary	Western Boundary	Type of Disposition	Type of Property/ Purpose of Disposition
IL00203100	Scattered Sites- North Central	2620 W. Potomac				Fee Simple	CHA plans for the disposition of vacant land. The property is excess to CHA's needs for this area.
N/A	Former Near North High School Site and Field	CTA Brown- Purple Line Tracks	Clybourn Avenue	Larrabee Street	Orchard Park Residential Developme nt	Fee Simple and /or Ground Lease	In November 2013, CHA's Board approved a land swap with the City of Chicago, through which CHA is expected to acquire, subject to HUD approval, the former site of the Near North High School and adjacent field. As part of previously planned CHA redevelopment activity in the Near North area, CHA intends to dispose of a portion of this land, in fee simple, subject to HUD approval, to the Chicago Park District for the development of a public park. The remaining portions of this land, subject to HUD approval, CHA intends to dispose of, either in fee simple conveyance or by ground lease, for mixed-income housing, retail development and/or other land uses.

### Long Term Plan for Offline Units Status

As of the 3rd quarter of FY2014, CHA has 2,881 public housing units across several categories that are currently offline and unavailable for occupancy 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 and status of CHA's long-term strategies to address offline units by category as of the end of 3rd quarter of FY2014.

Units pending redevelopment/planning

A significant number of units are offline due to pending redevelopment plans, primarily at Altgeld Gardens/Murray Homes, Frances Cabrini Rowhouses and Lathrop Homes. While planning is underway for the redevelopment of these sites, the number of offline units in this category will not fluctuate significantly in FY2015. 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 – 633 offline units (IL002002000)

CHA continues to work with stakeholders to finalize the master plan for the Altgeld-Murray community, including residential and community facility components. In FY2015, CHA plans to continue the ongoing Section 106 historic preservation process and to begin implementation of the final plan for this community. Pending finalization of plans, CHA anticipates completing the first phase of rehabilitation of approximately 218 units at Altgeld Gardens in FY2015.

Frances Cabrini Rowhouses – 438 offline units (IL002089000)

In FY2014, CHA completed a development zone plan for the remaining portions of Cabrini-Green, including Frances Cabrini Rowhouses, with the assistance of the City of Chicago's Department of Planning and Development, Chicago Park District, Chicago Department of Transportation, Chicago Public Schools, and the Near North Working Group. The development zone plan proposes preferred land uses including housing, retail, open space and other uses as well as reintegration of the street grid. CHA plans to release a solicitation for development proposals for the first phase in the 4<sup>th</sup> quarter of FY2014. CHA will plan for a solicitation for proposals for the Cabrini Rowhouses upon resolution of pending litigation.

Henry Horner Superblock – 99 offline units (IL002093000)

Redevelopment of the Horner Superblock will transform the existing public housing property into a mixed income development with 200 total rental units, including 95 for public housing, 50 for affordable and 55 for market rate residents. CHA continues to work with all development partners to begin redevelopment in FY2015 with unit delivery to be completed in FY2016.

Lathrop Homes – 753 offline units (IL002022000)

CHA remains committed to delivering 400 units of replacement family public housing units through a combination of historically preserved housing, new housing, retail and other amenities in a mixed-income community. In FY2014, the master plan for Lathrop Homes was finalized and planning and predevelopment work for Lathrop Phase I began. CHA continues to work with the Chicago Department of Planning and Development and other key stakeholders to pursue zoning approvals, financing and implementation plans for Phase I redevelopment in FY2015. The preliminary Phase I unit mix consists of 497 rental units, including 180 CHA, 111 affordable and 206 market rate units.

Parkview/Fannie Emanuel Senior Apartments – 181 offline units (IL002065000)

CHA will act as master developer for the redevelopment of Parkview/Fannie Emanuel Senior Apartments to provide 100% low-income housing for seniors, new resident community spaces and other site improvements. Interior demolition is anticipated to begin in the 4<sup>th</sup> quarter of FY2014, with construction planned to begin the 2<sup>nd</sup> quarter of FY2015 and unit delivery in FY2016. In October 2013, CHA submitted a RAD application which included this site, and CHA may proceed with RAD for this site if an award is received for in the future.

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 FY2015, a total of nine major capital projects will continue or begin, with three of the nine projects to be completed in FY2015. The following is a summary of major capital projects for FY2015.

FY2015 Major Capital Projects				
IL Number	Project/Site	Construction Start	Units Back Online/Available for Leasing	Project Description
IL002043000	Lidia Pucinska Apartments	April 2013	July 2015	Enhanced new life safety features (sprinklers, elevator controls and interior cameras), replacement of plumbing risers, kitchens and baths, and addressing water infiltration issues
IL002075000	Daniel Hudson Burnham Apartments	July 2015	March 2016	Water infiltration issues
Various	General Renovation of Scattered Site Units	September 2013	September 2017	Varies per site; generally complete renovation and minor site work
IL002052000, IL002052100	Lincoln Perry Apartments/Annex	October 2013	January 2016	Enhanced new life safety features (sprinklers, and interior cameras), replacement of plumbing risers, kitchens and baths
IL002084000	Judge Slater Annex	March 2014	March 2016	Enhanced new life safety features (sprinklers, and interior cameras), replacement of plumbing risers, kitchens and baths
IL002086000	Major Lawrence Apartments	May 2014	June 2016	Enhanced new life safety features (sprinklers, elevator controls and interior cameras), replacement of plumbing risers, kitchens and baths
IL002078000	Minnie Riperton Apartments	May 2014	March 2017	Enhanced new life safety features (sprinklers, elevator controls and interior cameras), replacement of plumbing risers, kitchens and baths
IL002076000	Caroline Hedger Apartments	June 2014	May 2017	Enhanced new life safety features (sprinklers, elevator controls and interior cameras), replacement of plumbing risers, kitchens and baths, and window replacement
IL002057000	Judge Fisher Apartments	March 2015	September 2016	Enhanced new life safety features (sprinklers, elevator controls and interior cameras), kitchens and baths, and a new heating system

Units pending demolition/disposition

Units in this category are pending HUD approval of demolition or disposition and will not come back online. As of 3<sup>rd</sup> quarter of FY2014, there are 43 units in the approved “demo/dispo” category in PIC. This includes two units demolished in FY2013 (2620 W. Potomac), which are expected to be removed from PIC in October 2014, and 41 units pending disposition for the creation of the National Public Housing Museum.

Units used for non-dwelling purposes

As of 3<sup>rd</sup> quarter of FY2014, CHA has maintained a reduction since September 2012 and currently uses only 265 units for non-dwelling purposes. CHA continues to evaluate non-dwelling use of units across its portfolio.

***Additional Planned Capital Maintenance Activity in FY2015***

CHA plans to continue or begin the following projects in FY2015:

- Mechanical, electrical, plumbing, and/or envelope improvements to several senior buildings including Caroline Hedger Apartments (IL002076000), Judge Slater Annex (IL002084000), Major Lawrence Apartments (IL0020086000), Lincoln Perry Apartments (IL002052000), Lincoln Perry Annex (IL002052100), Armour Square Apartments and Annex (IL002046000), Judge Fisher Apartments (IL002057000), Lidia Puchiska (IL002043000), and Minnie Riperton Apartments (IL002078000).
- Rehabilitation of the Jane Addams Family Resource Center (IL002001000) and the Charles Hayes Family Investment Center (IL002999999).

***Additional Planned Redevelopment Activity in FY2015***

*Clybourn & Division (IL# to be assigned upon closing)*

In FY2015, CHA plans to support a mixed-income, mixed-use development at Clybourn Avenue and Division Street in the Near North Revitalization Initiative area, as part of replacement housing for the former Cabrini Extension North. The development will consist of 82 total rental units, including 25 public housing, 16 affordable, and 41 market-rate units. The development also includes approximately 11,200 sq. ft. of residential community space and 17,200 sq. ft. of commercial/retail space. The financial transaction is projected to close in the 3<sup>rd</sup> quarter of 2015, with unit delivery planned for 2016.

*Casa Queretaro (IL# to be assigned upon closing)*

Casa Queretaro is a proposed mixed-income development to be located at 17<sup>th</sup> Street and Damen Avenue, which will be developed by The Resurrection Project, a not-for-profit community development corporation that serves the Pilsen neighborhood. The development will consist of a four-story, 45-unit rental building, including 15 public housing units and 30 affordable units for households with a range of incomes up to 60% of AMI. The City of Chicago plans to donate the land required for the development at the closing. Casa Queretaro is projected to close in the 4<sup>th</sup> quarter of FY2014, with construction beginning in FY2015 and unit delivery in FY2016.

*City Gardens (formerly Maplewood Courts) (IL# to be assigned upon closing)*

In FY2015, CHA plans to close the financial transaction for City Gardens, a single phase, mixed-income rental development located on the former Maplewood Courts city/state site and part of the revitalization of the former Rockwell Gardens. City Gardens will consist of 76 rental units. City Gardens will consist of 76 rental units, including 25 public housing, 30 affordable and 21 market rate units. Unit delivery is planned for FY2016.

*Harold Ickes Homes (IL002016000)*

CHA and the City of Chicago issued a Request For Proposals (RFP) in October 2014 to solicit proposals from qualified development teams for a mixed-income, mixed-use development at the former Harold Ickes site. In FY2015, CHA will continue working with the City of Chicago to develop a community that includes public housing and other residential, commercial, institutional, and recreational components.



Ida B. Wells Homes, Darrow Homes, Wells Extension, Madden Park Homes (IL002017000, IL02033)

In FY2015, two community development projects will be completed to support existing and future mixed-income housing development in the area. The Bronzeville Mariano's Market development will be constructed on the northeast corner of 39<sup>th</sup> Street and King Drive. The Quad Communities Arts & Recreation Center, located on the southwest corner of 35<sup>th</sup> Street and Cottage Grove Avenue, will create a new recreation facility with 30,000 square feet of athletic, recreational and arts spaces, including an indoor swimming pool and basketball courts.

LeClaire Courts and Extension (IL002024000)

In FY2015, CHA plans to procure and select a developer for mixed-income housing development on the former LeClaire Courts Extension site (federal land). In addition, CHA plans to sell seven acres of LeClaire Courts city-state land to the Academy for Global Citizenship (AGC) to build an international baccalaureate charter school that emphasizes environmental sustainability and green technology to grade school students, their families and the surrounding community.

Roosevelt Square

CHA plans to complete master planning activities in FY2015 for remaining undeveloped land at the former ABLA Homes site. CHA will work with a planning consultant, the City of Chicago, the working group, development partners, and community stakeholders to develop a master plan.

Rosenwald Apartments (IL# to be assigned upon closing)

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. The City of Chicago in partnership with private developers will historically restore, adaptively reuse and provide quality affordable senior and family housing opportunities. CHA, in support of this initiative, will participate through 60 senior units for public housing residents and 60 PBV units through the PRA program. The development team continues to coordinate, revise and complete development activities and plans to close and start property rehabilitation in FY2015.

St. Edmund's Oasis (IL# to be assigned upon closing)

St. Edmund's Oasis is the next planned phase of off-site development as part of replacement housing for the Washington Park community. This mixed-income site will consist of 58 rental units, including 19 public housing units and 39 affordable units on four separate sites. The City of Chicago plans to donate the land required for the development at the closing. The financial transaction is anticipated to close in the 1<sup>st</sup> quarter of FY2015, with unit delivery in FY2016.

Sterling Park Apartments (IL# to be assigned upon closing)

Sterling Park Apartments is a proposed redevelopment project that consists of adaptive reuse and historic rehabilitation of a vacated masonry industrial building located at 3333 W. Arthington Avenue in the North Lawndale Community. Mercy Housing Lakefront plans to develop 181 rental units, including 66 public housing units and 115 affordable units. The financial transaction is anticipated to close in FY2015, with construction completion and unit delivery in FY2016.

Funding for Redevelopment Activities

In response to Choice Neighborhoods or other Federal Notices of Funding Availability (NOFAs) released in FY2015, CHA may submit application(s) for grant funding for redevelopment and/or planning activities.

**General Description of Planned Capital Expenditures in FY2015**

**General Description of Planned Capital Fund Expenditures During FY2015**

CHA's anticipates a total of \$237.7M in planned capital expenditures for FY2015.

- \$62.8M in planned construction activities, upgrades and repairs at CHA family properties, including Altgeld Gardens/Phillip Murray, Dearborn homes, Lowden, Horner and the Jane Addams Resource Center.
- \$14.90M in planned construction activities, upgrades and repairs at CHA scattered sites properties.
- \$87.6M in planned construction activities, upgrades and repairs at CHA senior buildings. This includes required life safety and fire sprinklers and other rehabilitation work at Caroline Hedger Apartments, Minnie Ripperton Apartments, Armour Square Apartments, Lincoln Perry Apartments, Major Lawrence Apartments, Judge Slater Annex, Judge Fisher Apartments, and Lidia Pucinska Apartments.
- \$72.4M in construction or planning/pre-development activities for mixed-income/mixed-finance properties, including Rosenwald, City Gardens, Clybourn & Division, Sterling, Horner Superblock, Parkview/Fannie Emanuel, St. Edmund's Oasis, Harold Ickes, Parkside of Old Town Phase IIB, Casa Queretara, Lathrop, Real Estate Acquisition Program and other master planning activities.

## Section II-B: Leasing Information

### ***Planned Number of MTW Households Served at the End of FY2015***

By the end of FY2015, CHA currently anticipates serving a total of 60,599 MTW households across HCV and public housing programs. CHA continues to finalize MTW HCV leasing projections for FY2015.

#### **Planned Number of Households Served at the End of FY2015**

<b>MTW Households to be Served Through:</b>	<b>Planned Number of Households to be Served*</b>	<b>Planned Number of Unit Months Occupied/Leased***</b>
Federal MTW Public Housing Units to be Leased	18,064	216,768
Federal MTW Voucher (HCV) Units to be Utilized	42,535	510,420
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	0	0
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	0	0
<b>Total Households Projected to be Served</b>	<b>60,599</b>	<b>727,188</b>

\* Calculated by dividing the planned number of unit months occupied/leased by 12.  
 \*\* In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the PHA should estimate the number of households to be served.  
 \*\*\*Unit Months Occupied/Leased is the total number of months the PHA has leased/occupied units, according to unit category during the fiscal year.

### ***Planned Number of Non-MTW HCV Households Served at the End of FY2015***

By the end of FY2015, CHA anticipates serving a total of 2,077 households through non-MTW HCV programs, including Veterans Affairs Supportive Housing (VASH), Moderate Rehab and Mainstream 5-Year programs.

<b>Non-MTW Households to be Served Through:</b>	<b>Planned Number of Households Served</b>	<b>Planned Number of Unit Months Occupied/Leased</b>
VASH	814	9,762
Mod Rehab	1,213	14,556
Mainstream 5-Year	50	600
<b>Total Non-MTW Households</b>	<b>2,077</b>	<b>24,918</b>

### ***Reporting Compliance with MTW Statutory Objectives***

CHA is currently in compliance. This section does not apply.

**Description of Anticipated Issues Related to Leasing in FY2015**

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers or Local, Non-Traditional Units and Solutions in FY2015	
Housing Program	Description of Leasing Issues and Solutions
Federal MTW Public Housing Program	<p>As described in previous sections, CHA will continue to prioritize the issue of offline units in FY2015 and make additional units available for occupancy as expeditiously as possible.</p> <p>CHA continuously works to match the needs of applicants on the wait list with available public housing units. CHA is in the process of preparing for the opening of the wait list in late FY2014 to replenish the wait list for larger bedroom sizes, which will in turn aid leasing these units in FY2015.</p> <p>Another barrier to public housing leasing continues to be identifying applicants who can meet all of CHA's screening criteria and successfully pass eligibility requirements.</p>
Federal MTW Housing Choice Voucher Program	In FY2015, CHA will need to continuously monitor the local rental market for available units given the planned increase in HCV leasing.

**Section II-C: Wait List Information**

In FY2015, CHA will maintain the following major wait lists across public housing and Housing Choice Voucher programs.

**Public Housing Wait Lists**Family Housing (Community-Wide) Wait List

The Family Housing (Community-Wide) Wait List contains adult applicants who are interested in units within CHA's city-wide traditional family portfolio. This wait list will be opened in late FY2014. In FY2015, the wait list will be partially opened for eligible participants in CHA demonstration programs.

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.

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. 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.

Lake Parc Place Site-Based Wait List

The Lake Parc Place Site-Based Wait List contains applicants interested in units at CHA's Lake Parc Place property who are in the 51-80% Area Median Income range. Lake Parc Place's Tenant Selection Plan specifies the property must achieve a balance of households with Area Median Incomes of 0-50% and 51-80%.

**PBV (PRA) Wait List**

CHA plans to establish a separate PBV (PRA) wait list through the opening of CHA wait lists in late FY2014. The wait list will provide applicants with opportunities for project-based voucher units that consist of family, senior or supportive housing. CHA is in the process of developing individual senior site-based wait lists for PBV sites.

**HCV Wait List**

In FY2015, 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. CHA's HCV Wait List was last opened in FY2008, will be opened in late FY2014, and will remain partially opened in FY2015.

**Wait List Projections for FY2015**

The following wait list projections for FY2015 are based on CHA's current plans for upcoming wait list openings in FY2014. Depending on the outcome of the wait list openings, CHA may adjust the number of applicants added to wait lists.

Wait List Information Projected for the Beginning of FY2015				
Housing Program(s)	Wait List Type	Number of Households on Wait List	Wait List Open, Partially Open or Closed	Are There Plans to Open the Wait List During FY2015
Federal MTW Public Housing Units	Community-Wide (Family Housing)	40,000	Partially Open	Yes
Federal MTW Public Housing Units	Program Specific (Scattered Site/Community Area)	7,500	Partially Open	Yes
Federal MTW Public Housing Units	Site-Based (Senior)	8,000	Open	Yes
Federal MTW Public Housing Units	Site-Based (Lake Parc Place)	500	Partially Open	Yes
Federal MTW Project Based Voucher Program	Program Specific	16,000	Partially Open	Yes
Federal MTW Housing Choice Voucher Program	Program Specific	65,000	Partially Open	Yes

**Description of Partially Opened Wait Lists**

<b>Community-Wide (Family Housing)</b> In FY2015, the Community Wide wait List will remain open for the families that meet the eligibility criteria for and are participating in a CHA demonstration program or special initiative.
<b>Community-Area (Scattered Sites Wait Lists)</b> Community Area wait lists are open to residents of specific Chicago Community Areas who can meet residency requirements. In FY2015, CHA will open these wait lists as needed for specific community areas.
<b>Lake Parc Place Site Based Wait List</b> Public housing units at Lake Parc Place are offered through a site-based wait list, in accordance with the Tenant Selection Plan, to achieve a balance of households with Area Median Incomes of 0-50% and 51-80%. In FY2015, CHA anticipates the site-based waiting list will be open for families within the 51-80% AML category, who require a 1, 2 or 3 bedroom unit.

**PBV (PRA) Wait List**

In FY2015, the individual PBV (PRA) Senior Site-Based Wait Lists will remain open for applicants who can meet site specific requirements.

**HCV Wait List**

In FY2015, the CHA HCV Wait List will remain open for the following families:

- a) A family that meets the eligibility criteria for and is participating in a CHA demonstration program or special initiative
- b) A family that is a victim of a federally declared natural disaster affecting the city of Chicago
- c) A family that is an active participant in a Witness Protection Program or State Victim Assistance Program
- d) A family living in a CHA public housing unit which must be rehabilitated to meet ADA/504 requirements and for whom an alternate CHA public housing units is not available
- e) An over-housed or under-housed family living in a Section 8 Moderate Rehabilitation project administered by CHA for which no appropriate size unit is available in the same project that is already under a HAP contract

**Description of Local, Non-Traditional Program**

This is not applicable.

**Description of Other Wait List Type**

This is not applicable.

**Changes to CHA Wait Lists in FY2015**

In FY2015, CHA plans to implement a wait list policy change for demonstration programs in Public Housing and HCV. For demonstration programs and special initiatives, applicants that meet the individual program criteria will be pulled from the existing CHA wait list. If there are no applicants eligible for a specific program/initiative on the wait list, then applicants may be generated by referral from various community organizations or other government agencies. Referred applicants who meet program requirements are added to the wait list and are provided a local preference in accordance with the demonstration program for which they qualify. The demonstration wait list will remain open for qualified applicants.

In FY2014, CHA amended its HCV Administrative Plan to increase the prominence of the preference for families in which all adult household members work at least 20 hours per week. In FY2014, CHA also added a veteran preference to the HCV wait list. CHA will continue to implement these changes in FY2015.

In FY2014 and FY2015, CHA will also continue to expand the number of individual senior site-based wait lists for the PRA (PBV) program as properties come online.



**Section Three**  
**Proposed MTW Activities**



## **Section III: Proposed MTW Activities: HUD Approval Requested**

This section includes newly proposed MTW activities for which CHA is requesting HUD approval for FY2015.

### **MTW Activities Related to Housing/Development**

#### **Expedited Public Housing Unit Acquisition Process (2015-01)**

- **Description and Impact:** CHA is proposing to use MTW flexibility to support CHA's Real Estate Acquisition Program and to expedite the acquisition of units and/or buildings as public housing units in CHA- designated Opportunity Areas as well as Gautreaux-designated General and Revitalizing Areas..Through this activity, CHA would acquire units and/or buildings without prior HUD approval, provided that CHA certifies that HUD site selection requirements have been met. CHA would also be able to provide a commitment to certain developers before they acquire properties that they intend to sell to CHA after rehabilitation or construction. The units acquired may be condominiums, single-family homes (less than four units), or otherwise units within buildings containing non-public housing units.

While CHA would ensure that all applicable HUD and other federal requirements are met prior to acquisition, including environmental reviews, CHA would submit appropriate documentation to the local HUD Field Office for subsequent approval. Permitted costs for acquisition and rehabilitation would be within CHA's approved mixed-income total development cost limits using the alternate cost formula previously approved by HUD. Environmental review would be completed by CHA's designated Responsible Entity.

This initiative will increase the effectiveness of CHA's efforts to expand the number of available public housing units, including in mixed-income settings, by allowing CHA to take advantage of time-sensitive market opportunities for unit and/or building purchases and by expediting the acquisition process.

- **Implementation Year:** proposed FY2015
- **Statutory Objectives:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Standard Metrics:**

<b>Standard Metric</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>FY2015 Benchmark</b>
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 CHA's expedited acquisition process.	0 additional public housing units were made available as a result of CHA's expedited acquisition process. prior to FY2015.	5 additional public housing units will be made available as a result of this activity.
HC-3: Decrease in Wait List Time	Average applicant time on wait list in months as a result of CHA expedited acquisition process.	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 applicants on the Public Housing Family Wait List will remain stable at 41 months in FY2015.
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 CHA expedited acquisition process.	0 households were able to move to a better unit and/or neighborhood of opportunity prior to FY2015 as a result of CHA expedited acquisition process.	5 households will be able to move to a better unit and/or neighborhood of as a result of this activity.



### Section III: Proposed MTW Activities: HUD Approval Requested

- Data Collection: CHA will track the number of additional public housing units made available through the acquisition process. As this activity is implemented, CHA may revise the activity's metrics.
- Authorization: Attachment C, Section C(13) of CHA's Amended and Restated MTW Agreement allows acquisition of public housing sites without HUD approval, provided that the agency certifies that HUD site selection requirements have been met. Attachment C, Section B2 of CHA's Amended and Restated MTW Agreement provides that MTW Agencies may make available to Agency Partners (including related entities) the least restrictive regulatory requirements allowable for the implementation of MTW initiatives.





**Section Four**  
**Approved MTW Activities**



## **Section IV: Approved MTW Activities: HUD Approval Previously Granted**

This section contains information on CHA's approved MTW activities.

### **Implemented Activities**

#### **MTW Activities Related to Housing/Development**

##### ***Revitalization of 25,000 Units (2000-01)***

- **Description and Impact:** CHA is committed to the goal of replacing 25,000 housing units as part of the original Plan for Transformation and MTW Agreement obligations. 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 pursue a variety of unit delivery strategies to achieve the 25,000 unit goal. In FY2015, CHA plans to deliver an additional 1,040 public housing and project-based voucher units.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2015 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 672 new housing units in FY2015 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 218 public housing units and preserve 150 PBV units in FY2015 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, and acquisition 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 Redevelopment and Rehabilitation Activities (2010-01)***

- **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.

Through a FY2014 MTW Annual Plan Amendment, CHA received approval 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 approved in FY2014)
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Status Update:** In FY2014, CHA utilized the alternative cost formula to close and start construction at Park Boulevard IIB, Gwendolyn Place, and Parkside IIB Rental, which will deliver a total of 103 public housing units in FY2014-FY2015. In FY2015, CHA plans to utilize the alternative formula to close and start construction across nine sites with a total of 437 public housing units.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2015 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 through use of the alternate TDC formula.	31 additional public housing units are planned for delivery and 140 additional public housing units and planned to be under construction in FY2015 through use of the alternate TDC formula.
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 use of the alternate TDC formula.	0 housing units preserved/rehabilitated through use of the alternate TDC formula in FY2015.
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 applicants on the Public Housing Family Wait List will remain stable at 41 months in FY2015.
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 use of the alternate TDC formula.	Zero households will lose assistance or have to move in FY2015 through use of the alternate TDC formula.

## Section IV: Approved MTW Activities: HUD Approval Previously Granted

CE-1: Agency Cost Savings	Total cost of task (in dollars).	CHA spent zero dollars through use of the alternate TDC formula prior to implementation.	In FY2015, CHA projects a cost of \$10,024,894 for 31 additional public housing units delivered and \$44,937,978 for 140 additional units under construction through use of the alternate TDC formula.
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Units Planned for FY2015 Delivery that will use MTW TDC	Public housing units without MTW TDC	Additional public housing units with MTW TDC	Total Public Housing Units
Park Boulevard IIB	27	10	37
Gwendolyn Place/Legends South C3	24	6	30
Parkside IIB Rental	21	15	36
<b>Total Units</b>	<b>72</b>	<b>31</b>	<b>103</b>

Developments Planned to be Under Construction in FY2015 using MTW TDC	Public housing units without MTW TDC	Additional public housing units with MTW TDC	Total Public Housing Units
St. Edmund's Oasis	18	1	19
Casa Queretaro	11	4	15
City Gardens	16	9	25
Rosenwald	34	26	60
Sterling	50	16	66
Clybourn & Division	19	6	25
Lathrop Phase 1	116	64	180
Washington Park Phase I: 45 <sup>th</sup> & Cottage	12	5	17
Roosevelt Square Market Rate Rental	21	9	30
<b>Total Units</b>	<b>297</b>	<b>140</b>	<b>437</b>

- **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. CHA also tracks the average time on the Public Housing Family Wait List and the cost of the activity. Beginning in FY2015, 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.

**MTW Activities Related to Public Housing and HCV****\$75 Minimum Rent for Public Housing and HCV (2009-01)**

- **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 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 public housing and HCV households to pay a minimum rent of \$75, or less if they request a hardship to minimum rent.
  - **HCV:** As of June 2014, the minimum rent population includes 7,158 HCV households. 358 (5%) HCV households from the total minimum rent population have a hardship and are paying less than \$75.
  - **Public Housing:** As of June 2014, the minimum rent population includes 1,680 Public Housing households. 167 (10%) Public Housing households from the total minimum rent population, have a hardship and are paying less than \$75.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2015 Benchmark
CE-5: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<p><b>Public Housing:</b> In FY2008, 1,524 residents who qualified for minimum rent were expected to pay \$50 minimum rent for a total annual contribution of \$914,400.</p> <p><b>HCV:</b> In FY2008, 5,010 residents who qualified for minimum rent were expected to pay \$50 minimum rent for a total annual contribution of \$3,006,000.</p>	<p><b>Public Housing:</b> In FY2015, CHA estimates 1,770 residents will qualify for minimum rent and will be paying \$75 minimum rent for a total annual contribution of \$1,593,000.</p> <p><b>HCV:</b> In FY2015, CHA estimates 8,900 residents will qualify for minimum rent and will be paying \$75 for a total annual contribution of \$8,010,000.</p>

- **Data Collection:** CHA tracks Total Tenant Payment (TTP) data to determine the number of residents who contribute \$75 towards rent. In FY2015, CHA will continue to use data from quarterly reports to identify 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.

#### ***Choose to Own Homeownership Program for Public Housing and HCV (2011-01)***

- **Description and Impact:** In FY2014, CHA received approval 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. The new minimum income requirement will take effect for all new HCV and public housing program enrollees when the FY2015 HCV Administrative Plan reflecting these changes, approved by CHA's Board in August 2014, goes into effect on January 1, 2015. It does not apply to those currently in the program preparing to purchase a home. This change also does 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 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), FY2015 (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.
- **Status Update:** The new minimum income requirement will take effect for all new HCV and public housing program enrollees when the FY2015 HCV Administrative Plan reflecting these changes, approved by CHA's Board in August 2014, goes into effect on January 1, 2015.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2015 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 FY2015.
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 FY2015.



## Section IV: Approved MTW Activities: HUD Approval Previously Granted

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 FY2015.
*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.

### ***Modified Family Self Sufficiency Program for HCV and Public Housing Participants (2014-01)***

- **Description and Impact:** In FY2014, CHA received approval to revise the participation requirements for the Family Self-Sufficiency program for public housing and HCV participants in the following ways:
  - Provide FSS participants with the ability to opt out of the Earned-Income Disregard 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 engagement 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.

- **Implementation Year:** 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.
- **Status Update:** The new FSS program policies will take effect immediately for new enrollees and optionally for current participants when the FSS Action Plan reflecting these changes is approved by HUD. The FSS program will be fully enrolled in FY2015 with the new program requirements in place.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2015 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 FY2015.

## Section IV: Approved MTW Activities: HUD Approval Previously Granted

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 FY2015, the average escrow per FSS participant will remain stable at \$2,800 (1,050 projected participants).
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 575 participants in FY2015, 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 FY2015.
SS-4: Households Removed from TANF	Number of households receiving TANF assistance (decrease).	In FY2013, 133 FSS participants were receiving TANF.	In FY2015, 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.	250 new FSS participants enrolled, for a total of 1,250 in FY2015.
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).	<p><u>Public Housing:</u> In FY2013, the average subsidy per public housing household was \$6,519 (based on 21,417 eligible units).</p> <p><u>HCV:</u> In FY2013, the average subsidy per HCV household was \$8,922 (based on 36,679 eligible vouchers).</p>	<p><u>Public Housing:</u> The average subsidy per public housing household is projected to be approximately \$6,600 (based on 21,290 eligible units) in FY2015.</p> <p><u>HCV:</u> The average subsidy per HCV household is projected to be approximately \$9,600 (based on 38,000 eligible vouchers) in FY2015.</p>
SS-7: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<p><u>Public Housing:</u> In FY2013, public housing FSS participants contributed a total of \$1,006,056 (237 households).</p> <p><u>HCV:</u> In FY2013, HCV FSS participants contributed a</p>	<p><u>Public Housing:</u> The total contribution of public housing FSS participants will remain stable at \$1,000,000 (230 households) in FY2015.</p> <p><u>HCV:</u> The total contribution of HCV FSS</p>

## Section IV: Approved MTW Activities: HUD Approval Previously Granted

		total of \$1,831,476 (505 households).	participants will remain stable at \$1,800,000 (500 households) in FY2015.
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 FY2015, 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, 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.

### MTW Activities Related to Public Housing

#### ***Public Housing Work Requirement (2009-02)***

- **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.<sup>2</sup> 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.

- **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:**

<sup>2</sup> 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).

## Section IV: Approved MTW Activities: HUD Approval Previously Granted

Standard Metric	Unit of Measurement	Baseline	FY2015 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 FY2015 (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 FY2015.
		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 FY2015.
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 FY2015, the number of “work-able” public housing households with a “work-able” adult subject to the work requirement receiving TANF will remain stable at 2,400.
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 FY2015.
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).	<u>Public Housing:</u> The average subsidy per public housing household is projected to be approximately \$6,600 (based on 21,290 eligible units) in FY2015.

## Section IV: Approved MTW Activities: HUD Approval Previously Granted

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 FY2015.
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 FY2015.
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 applicants on the Public Housing Family Wait List will remain stable at 41 months in FY2015.
<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	FY2015 Benchmark
Work Requirement Compliance Status	Number/Percent of residents in each work requirement compliance status (Compliant, Safe Harbor, Exempt, Under Legal, Non-compliant)	As of 12/31/12: 49% (4,149) compliant 27% (2,292) exempt 20% (1,724) Safe Harbor 1% (71) non-compliant 3% (297) under legal	The percentages of residents in each work requirement compliance status will remain stable in FY2015.
<p><u>Compliant:</u> Residents who are meeting the work requirement through authorized activities, including employment or other work experience opportunities, school/training participation or volunteer/community service opportunities.</p> <p><u>Exempt:</u> Residents age 55 or older or those who meet disability/caretaker or other requirements for an exemption.</p> <p><u>Safe Harbor:</u> Residents who are unable to comply with the work requirement may be eligible for Safe Harbor under certain circumstances, including but not limited too reasonable accommodation, temporary medical conditions, recent employment separation, and other circumstances that present barriers to finding/maintaining employment.</p> <p><u>Non-Compliant:</u> Non-exempt residents who are not meeting the requirement and are not approved for Safe Harbor.</p> <p><u>Under Legal:</u> Non-exempt residents who are undergoing eviction proceedings, whether for non-compliance with the work requirement or for any other reason.</p> <p>* See Chapter 8 of CHA’s <i>Admissions and Continued Occupancy Policy</i> (ACOP) for more detail.</p>			

- **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, 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 (2008-01)**

- **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.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2015 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 FY2015.

- **Additional Metrics:**

Additional Metric	Unit of Measurement	Baseline	FY2015 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 FY2015.

- **Data Collection:** CHA tracks the number of residents engaged through the Office of the Ombudsman, the number of meetings and resident participants, and the posting of 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***Biennial Re-examinations for HCV (2006-01)***

- **Description and Impact:** 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. The impact of this activity is a decrease in staff time and resources for conducting re-examinations for applicable families. In addition, this activity decreases the re-examination burden for participants who undergo re-examinations on a biennial basis instead of an annual basis. Biennial re-examinations will be applicable for those HCV households who are not on annual or triennial re-examination schedules.<sup>3</sup>
- **Implementation Year:** FY2006 (HCV), proposed FY2014 (Public Housing)
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:** Biennial re-examinations will continue to result in staff time savings in the re-examination process. CHA conducted a new time study and cost analysis for re-examinations in June 2014 to improve the tracking for this activity. (See *Data Collection*.)
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline <sup>^</sup>	FY2015 Benchmark
CE-1: Agency Cost Savings	Total cost of task (in dollars).	In FY2013, HCV households who had re-exams, based on a biennial schedule, (14,105 households, or half of the total 28,209 biennial-eligible households) cost approximately \$1,057,875. (14,105 re-exams x \$75).	In FY2015, annual re-exams for applicable HCV participants will cost approximately \$1,905,445 (13,141 re-exams x \$145).
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	In FY2013, for HCV households who had re-exams, based on a biennial schedule (14,105 households, or half of the total 28,209 biennial-eligible households), CHA spent 49,368 staff hours (14,105 re-exams x 3.5 hours)	In FY2015, CHA will spend 85,417 staff hours on annual re-exams for applicable HCV participants (13,141 re-exams x 6.5 hours).
CE-5: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	In FY2013, HCV households who had re-exams, based on a biennial schedule, contributed a total of \$47,568,930 (14,105 households, or half of the total 28,209 biennial-eligible households).	In FY2015, HCV households who are due for re-exams, based on a biennial schedule, will contribute a total of \$46,410,780 (13,141 households).
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 28,209 HCV households who were eligible for biennial re-exams was \$5,226.	In FY2015, the average income from wages for 28,000 HCV households who are eligible for biennial re-exams is expected to be \$5,000.

<sup>3</sup> 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 planning to implement triennial re-examinations for fixed-income households with only elderly and/or disabled participants.

## Section IV: Approved MTW Activities: HUD Approval Previously Granted

SS-3: Increase in Positive Outcomes in Employment Status*	Other category:  Having earned income.	In FY2013, 3,697 “work-able” HCV heads of household had income from wages (of 14,105 households, or half of the total 28,209 biennial-eligible households)	In FY2015, 3,700 “work-able” HCV heads of household are expected to have income from wages.
		In FY2013, 42% of “work-able” HCV heads of household eligible for biennial re-exams had income from wages in FY2013 (3,697 of 8,776 work-able heads of household).	In FY2015, 42% of “work-able” HCV heads of household eligible for biennial re-exams are expected to have income from wages.
SS-4: Households Removed from Temporary Assistance for Needy Families (TANF)	Number of households receiving TANF assistance (decrease).	In FY2013, 1,480 HCV households were receiving TANF (of 14,105 households, or half of the total 28,209 biennial-eligible households).	In FY2015, the number of HCV households eligible for biennial re-examinations who receive TANF will remain stable at 1,500.
SS-8: Households Transitioned to Self-Sufficiency**	Number of households transitioned to self-sufficiency (increase).	In FY2013, 1,144 HCV households moved up at least one AMI category (of 14,105 households, or half of the total 28,209 biennial-eligible households).	In FY2015, 1,100 HCV households (of 14,000 who had biennial re-exams) are expected to move up at least one AMI category.
<p>^CHA has adjusted baselines for these metrics based on implementation plans for biennial and triennial re-examinations.</p> <p>*For SS-3 tracking, CHA defines “work-able households” 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. In addition, CHA will continue to 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, and those who move up to a higher AMI category as described above.

In FY2014, CHA conducted a new time study and cost analysis for re-examinations. The cost per re-examination increased from \$75 to \$145. The time to conduct a re-examination increased from 3.5 hours to 6.5 hours. The new HCV analyses include itemize costs (direct and indirect) of a random sample population and track costs associated with re-examinations. Itemized costs reviewed included but were not limited to operating expenses, staffing, training, and quality control activities.

- **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.



**Exception Payment Standards (2010-02)**

- **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.<sup>[1]</sup> 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:** In FY2014, CHA will begin to transition families impacted by the new policy that lowers the limit for exception payment standards to 150% of FMR. Approximately 260 families are affected and most will be required to move. CHA will provide mobility counseling services to assist these families in the transition. CHA will continue to evaluate the implementation of exception payment standards in the future.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY 2015 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 FY2015, 1,300 households will be leased (including new and existing leases) in Opportunity Areas with exception payment standards.

- **Data Collection:** CHA tracks the number of HCV participants living in CHA-designated Opportunity Areas with 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.

<sup>[1]</sup> 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, the CHA has received a total 1,119 applications and enrolled 488 OEP members. There are currently 381 OEP Members.

OEP members are eligible for a Unit Excellence Program (UEP) designation, which provides additional unit-based benefits, such as acceptance of passed inspections for new tenancy approvals, vacancy payments, and biennial inspection. Effective August 2013, all new OEP applicants must have one (1) unit participating in UEP before being accepted as a OEP Member and all current OEP Members, accepted before August 1, must have one (1) unit by August 2014. As of June 2014, a total of 266 OEP members have at least one (1) UEP unit for a total of 991 occupied UEP units. The Owner Excellence Program aims to have 2,000 occupied UEP units by the end of FY 2015. Unit-based benefits will continue to be restricted to UEP units.

The following 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 (2011-02)***

- **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 30, 2014, CHA has approved 8 transferable inspections since this activity was authorized. In FY2014, CHA completed the evaluation of the OEP program and is in the process of implementing new procedures that will streamline the operations of this program.

**Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2015 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).	In FY2015, 5 households will be able to move to a better unit and/or neighborhood of opportunity as a result of this activity.
CE-1: Agency Cost Savings	Total cost of task (in dollars).	In FY2012, CHA conducted 261 annual or initial inspections for UEP units for a total cost of \$25,056 (261 x \$96)	In FY2015, CHA expects to conduct 500 annual or initial inspections of UEP units for a total cost of \$48,000 (500 x \$96). 5 UEP units may have a transferred annual or initial inspection for a total cost of \$47,520 (\$96 x 5 = \$480) (\$48,000 - \$480 = \$47,520).

#### Section IV: Approved MTW Activities: HUD Approval Previously Granted

CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	In FY2012, CHA conducted 261 annual or initial inspections for UEP units for total of 239 staff hours (261 x .92)	In FY2015, CHA expects to conduct 500 annual or initial inspections of UEP units for a total of 460 staff hours (500 x .92 hours). 5 UEP units may have a transferred annual or initial inspection for a total time of 455 staff hours (5 x .92 = 5) (460 - 5 = 455).
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- **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 automating the process to transfer a passed annual or initial inspection. CHA estimates the cost of an initial/annual inspection is \$96 and takes .92 staff hours (55 minutes). However, CHA will conduct new time studies/cost analyses for initial/annual inspections by the end of FY2015. The HCV analyses will reflect updates associated with new contracts for administration of the HCV program. CHA will itemize costs (direct and indirect) of a random sample population and track costs associated with initial/annual inspections. Itemized costs to be reviewed include but may not be limited to operating expenses, staffing, training, and quality control activities.
- **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 (2011-03)**

- **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 2014, CHA has issued a total of 62 vacancy payments for UEP units for a total cost of \$98,210. Based on historical average, CHA estimates the approval of 65 vacancy payments in FY2015. In FY2014, CHA completed the evaluation of the OEP program and is in the process of implementing new procedures that will streamline the operations of this program. CHA will continue to review vacancy payments data to evaluate and ensure the financial sustainability of this activity.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY 2015 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.	65 UEP units will be preserved through a vacancy payment in FY2015.

- **Data Collection:** CHA tracks the number of UEP units preserved in the HCV program through vacancy payments.
- **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.

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

***Exceed the Limit of 25% Project-Based Voucher Assistance in Family Properties (2008-02)***

- **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 FY2014, CHA will use this flexibility in 11 PBV developments containing a total of 370 units, of which 127 are PBV units. Of the 127 PBV units, 38 are a result of exceeding the 25% limit. In FY2015, CHA anticipates using this flexibility for two additional family developments containing a total of 240 PBV, of which 98 housing units will be preserved as a result of exceeding the 25% limit.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2015 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.	0 additional PBV units will be made available by exceeding 25% in family PBV properties in 2015.
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.	98 housing units will be preserved by exceeding 25% in family PBV properties in 2015.

- **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 (2011-04)***

- **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;
  - Identify owners who currently use Yardi, CHA's system of record;
  - Established 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.
  - In 2014 CHA has authorized one qualified owner/property management firm to perform initial eligibility determinations and re-examinations.
  - By the end 2014, CHA plans to continuously select and qualify owners/property managers to perform initial eligibility determinations and re-examinations.

In FY2015, CHA anticipates allowing qualified owners to conduct initial eligibility and re-examinations for 311 units for a projected cost savings of \$292,185.

- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2015 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 FY2015, CHA will spend \$882,012 for PRA initial eligibility determinations and re-examinations. (2,371 units x \$372).
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 FY2015, 14,226 hours of staff time will be dedicated to PRA initial eligibility determinations and re-examinations (2,371 units x 6.5 hours).

- **Data Collection:** CHA estimates the total cost of conducting PRA initial eligibility determinations and re-examinations for new units is \$939.50. This includes a cost of \$372 yearly per unit for eligibility determinations/re-examinations, based on a \$31.00 monthly PUC, as well as a new unit admission fee of \$567.50. 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 6.5 hours to conduct an initial eligibility determination or re-examination based on new time/cost analyses conducted 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.

#### ***PBV Contract Commitments with 16-30 Year Initial Terms (2011-05)***

- **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 have 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 701 PBV housing units. By the end of 2014, CHA anticipates applying this flexibility to an additional 198 units. In FY2015, CHA anticipated using this flexibility for an additional 313 units.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2015 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.	128 PBV units made available in 2015 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.	185 PBV units preserved in 2015 with 16-30 year contracts.

- **Data Collection:** CHA tracks the number of additional PBV units that are 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 (2011-06)***

- **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 impact of this activity is to reduce costs 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:** Since implementation, CHA has placed 646 PBV units in 18 developments under HAP Contract utilizing Certificates of Occupancy issued by the City of Chicago Department of Building Inspections. In FY2015, CHA anticipates adding 101 PBV units in 4 new construction developments under HAP contract utilizing Certificates of Occupancy issued by the City of Chicago Department of Building Inspections for a savings of \$3,327.95 (101 units x \$32.95 per year).
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2015 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 FY2015, CHA spent \$0 on initial PRA inspections for new construction and substantial rehabilitation properties.
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 FY2015, 0 hours of staff time will be dedicated to initial PRA inspections for new construction and substantial rehabilitation properties.

- **Data Collection:** CHA estimates the cost of conducting initial PRA inspections per unit is \$32.95. 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 (2011-07)***

- **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 in reducing turnover costs in PBV developments.
- **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 FY2014, it is anticipated that approximately 22 PRA HAP contracts totaling 203 PBV units will have new program participants that only will be eligible for Housing Choice Vouchers after two years of occupancy. In FY2015, CHA anticipates that the two-year tenancy requirement will apply to 10 new HAP Contracts totaling 356 PBV units.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2015 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 FY2015, CHA estimates spending \$0 to transfer tenants from non-supportive PBV units to tenant-based vouchers in FY2015.
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 FY2015, 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 (2011-08)***

- **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 October 2014, CHA has provided \$45,859 for initial vacancy payments in FY2014. CHA is currently using this flexibility for 4 developments totaling 31 initial vacant PBV units. CHA anticipates paying an additional \$12,559 by the end of FY2014 for approximately 19 PBV units in 1 development.

CHA anticipates issuing vacancy payments for 30% of applicable new PRA units based on a yearly average. In FY2015, CHA anticipates vacancy payments may be issued to 106 PBV units for an estimated cost of \$87,132 for a period of 60 days based on the average HAP rent.

- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2015 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.	106 additional PBV units will be made available through vacancy payments during initial leasing in FY2015.

- **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.

### **Not Yet Implemented Activities**

The following activities approved in FY2014 have not been implemented. CHA plans to implement these activities beginning in FY2015.

#### ***Biennial Re-examinations for Public Housing (2014-03)***

- **Description and Impact:** CHA plans to implement biennial re-examinations for public housing residents to review family circumstances, income, assets, expenses, and family composition to establish continued eligibility for public housing. The impact of this activity is a decrease in staff time and resources for conducting re-examinations for applicable families. In addition, this activity decreases the re-examination burden for participants who undergo re-examinations on a biennial basis instead of an annual basis. Biennial re-examinations will be applicable for those public housing residents who are not on annual or triennial re-examination schedules.<sup>4</sup>
- **Implementation Year:** FY2015
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:** CHA plans to implement biennial reexaminations for public housing in FY2015. CHA will place those admitted in odd admission years on the biennial schedule after completion of their FY2015 re-examination. Residents who were admitted in even admission years will be reexamined again in FY2016 and then placed on the biennial re-examination schedule. All eligible residents will be placed on the biennial re-examination schedule by the end of FY2016.
- **Standard Metrics:**

<sup>4</sup> 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 planning to implement triennial re-examinations for fixed-income households with only elderly and/or disabled participants.

## Section IV: Approved MTW Activities: HUD Approval Previously Granted

Standard Metric	Unit of Measurement	Baseline <sup>^</sup>	FY2015 Benchmark
CE-1: Agency Cost Savings	Total cost of task (in dollars).	In FY2013, annual re-exams for PH households eligible for biennial re-exams cost \$960,075 (12,801 re-exams x \$75).	In FY2015, annual re-exams for PH households eligible for biennial re-exams will cost approximately \$1,850,000 (12,800 re-exams x \$145).
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	In FY2013, CHA spent 44,804 staff hours on annual re-exams for PH households eligible for biennial re-exams (12,801 x 3.5 hours).	In FY2015, CHA will spend 83,000 staff hours on annual re-exams for PH households eligible for biennial re-exams (12,800 re-exams x 6.5 hours).
CE-5: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	In FY2013, public housing households eligible for biennial re-exams contributed a total of \$49,185,852 (12,801 households).	In FY2015, PH households eligible for biennial re-exams will contribute a total of \$49,000,000 (12,800 households).
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 public housing households eligible for biennial re-exams was \$5,564. (12,801 households).	In FY2015, the average income from wages for 12,800 PH households who are eligible for biennial re-exams, is expected to be \$5,500.
SS-3: Increase in Positive Outcomes in Employment Status*	Other category: Having earned income.	In FY2013, 2,976 “workable” public housing heads of household eligible for biennial re-exams had income from wages.  In FY2013, 59% of “workable” public housing heads of household eligible for biennial re-exams had income from wages.	In FY2015, 3,000 “workable” public housing heads of household eligible for biennial re-exams are expected to have income from wages.  In FY2015, 59% of “workable” public housing heads of household eligible for biennial re-exams are expected to have income from wages.
SS-4: Households Removed from Temporary Assistance for Needy Families (TANF)	Number of households receiving TANF assistance (decrease).	In FY2013, 6,319 public housing households (out of 12,801) eligible for biennial re-exams were receiving TANF.	In FY2015, the number of public housing households eligible for biennial re-examinations who receive TANF will remain stable at 6,300.
SS-8: Households Transitioned to Self-Sufficiency**	Number of households transitioned to self-sufficiency (increase).	In FY2013, 1,029 public housing households (out of 12,801) eligible for biennial re-exams moved up at least one AMI category.	In FY2015, 1,000 Public Housing households (out of 12,800) eligible for biennial re-exams are expected to move up at least one AMI category.
<sup>^</sup> CHA has adjusted baselines for these metrics based on implementation plans for biennial and triennial re-examinations. *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.			

**\*\*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).**

- **Data Collection:** CHA will track the staff time and cost savings for biennial re-examinations. In addition, CHA will continue to 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, and those who move up to a higher AMI category as described above.

In FY2014, CHA conducted a new time study and cost analysis for re-examinations. The cost per re-examination increased from \$75 to \$145. The time to conduct a re-examination increased from 3.5 hours to 6.5 hours. The new analyses included itemized costs (direct and indirect) of a random sample population and track costs associated with re-examinations. Itemized costs reviewed included but were not limited to operating expenses, staffing, training, and quality control activities.

- **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.

***Triennial Re-examinations for Households with Only Elderly/Disabled Participants and Fixed Income for HCV and Public Housing (2014-02)***

- **Description and Impact:** CHA proposes to implement a streamlined triennial re-examination schedule for public housing and HCV fixed income households 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:** FY2015 (HCV and Public Housing)
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:**
  - **HCV:** Currently, HCV participants are on a biennial re-examination schedule. CHA will phase in the implementation of this activity in FY2015. CHA will process HCV re-examinations already scheduled in FY2015 and assign the new date of re-examination (FY2017 for biennial population and FY2018 for triennial population). CHA will process re-examinations already scheduled in FY2016 and assign the new date of re-examination (FY2018 for biennial population and FY2019 for triennial population).
  - **Public Housing:** CHA plans to implement triennial re-examinations for public housing in FY2015. CHA will place those admitted in odd admission years on the triennial schedule after completion of their FY2015 re-examination. Residents who were admitted in even admission years will be reexamined again in FY2016 and then placed on the triennial re-examination schedule. All eligible residents will be placed on the triennial re-examination schedule by the end of FY2016.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline^	FY 2015 Benchmark
CE-1: Agency Cost Savings	Total cost of task (in dollars).	<u>HCV:</u> In FY2013, based on the existing biennial schedule, CHA spent \$269,325 on re-exams for eligible fixed-	<u>HCV:</u> In FY2015, based on the existing biennial schedule, CHA will spend approximately \$522,000 on re-exams for fixed-income

## Section IV: Approved MTW Activities: HUD Approval Previously Granted

		income elderly/ disabled households (3,591 x \$75).  <u>Public Housing:</u> In FY2013, CHA spent \$367,800 on annual re-exams for fixed-income elderly/disabled households (4,904 re-exams x \$75).	elderly/disabled households (3,600 x \$145).  <u>Public Housing:</u> In FY2015, CHA will spend approximately \$710,500 on annual re-exams for fixed-income elderly/disabled households (4,900 re-exams x \$145).
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	<u>HCV:</u> In FY2013, based on the existing biennial schedule, CHA spent 12,569 staff hours on re-exams for eligible fixed-income elderly/ disabled households (3,591 x 3.5 hours).  <u>Public Housing:</u> In FY2013, CHA spent 17,164 staff hours on annual re-exams for public housing fixed-income disabled/elderly households (4,904 re-exams x 3.5 hours).	<u>HCV:</u> In FY2015, based on the existing biennial schedule, CHA will spend approximately 23,400 staff hours on annual re-exams for HCV fixed income disabled/elderly households (3,600 re-exams x 6.5 hours).  <u>Public Housing:</u> In FY2015, CHA will spend approximately 31,850 staff hours on annual re-exams for public housing fixed-income disabled/elderly households (4,900 re-exams x 6.5 hours).
CE-5: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<u>HCV:</u> In FY2013, based on the existing biennial schedule, eligible fixed-income elderly/disabled households contributed a total of \$11,398,176 (3,591 households).  <u>Public Housing:</u> In FY2013, public housing fixed-income elderly/disabled households contributed a total of \$15,526,368 (4,904 households).	<u>HCV:</u> In FY2015, based on the existing biennial schedule, eligible fixed-income elderly/disabled households will contribute a total of approximately \$11,400,000 (3,600 households).  <u>Public Housing:</u> In FY2015, public housing fixed-income elderly/disabled households will contribute a total of approximately \$15,500,000 (4,900 households).
^CHA has adjusted baselines for these metrics based on implementation plans for biennial and triennial re-examinations.			

- Data Collection: CHA will track the staff time and cost savings for triennial re-examinations. In FY2014, CHA conducted a new time study and cost analysis for re-examinations. The cost per re-examination increased from \$75 to \$145. The time to conduct a re-examination increased from 3.5 hours to 6.5 hours. The new analyses included itemized costs (direct and indirect) of a random sample population and track costs associated with re-examinations. Itemized costs reviewed included but were not limited to operating expenses, staffing, training, and quality control activities
- 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.

#### ***CHA Re-Entry Pilot Program (2014-04)***

- 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:** FY2015
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Status Update:** This activity is pending both HUD and CHA Board approval. Upon receiving necessary approvals in FY2014, CHA will work to begin program implementation which will continue into FY2015.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	2015 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 FY2015.
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 FY2015.
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 FY2015.
		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.	25 initial program participants will receive services through the re-entry pilot program in FY2015.
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).	<p><b>Public Housing:</b> In FY2013, the average subsidy per public housing household was \$6,519 (based on 21,417 eligible units).</p> <p><b>HCV:</b> In FY2013, the average subsidy per HCV household was \$8,922 (based on 36,679 eligible vouchers).</p>	<p><b>Public Housing:</b> The average subsidy for PH households with re-entry pilot participants will remain consistent with CHA's average subsidy per public housing household in FY2015.</p> <p><b>HCV:</b> The average subsidy for HCV households with re-entry pilot participants will remain consistent with CHA's average subsidy per HCV household in FY2015.</p>

## Section IV: Approved MTW Activities: HUD Approval Previously Granted

SS-7: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<p><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.</p> <p><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.</p>	<p><u>PH:</u> The total contribution of public housing families with program participants will be consistent with CHA's average in FY2015.</p> <p><u>HCV:</u> The total contribution of HCV families with program participants will be consistent with CHA's average in FY2015.</p>
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 FY2015.
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 FY2015.

- Data Collection: CHA, in partnership with re-entry providers, will track the number of program participants, participant compliance with requirements and service participation.
- Authorization: Attachment C, Section B(4) of CHA's Amended and Restated MTW Agreement which allows the development of conditional housing programs and waives certain provisions of Sections 3, 4, 5, 8 and 9 of the 1937 Act and 24 CFR 941, and 960 Subpart B. CHA is seeking MTW authority specifically to implement conditional program participation agreements and mandatory participation in services as a component of the program.

**Summary of Implemented and Not Yet Implemented Activities**

<b>FY2015 Implemented MTW Activities</b>				
<b>Housing and Development</b>				
<b>MTW Activity Number</b>	<b>Ongoing MTW Activity</b>	<b>Description</b>	<b>Statutory Objective</b>	<b>Authorization</b>
2000-01	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
2010-01	Reasonable Cost Formula and Methodologies for Redevelopment and Rehabilitation	HUD approved the reasonable cost formula for redevelopment in FY2010. 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)
<b>Public Housing and HCV</b>				
<b>MTW Activity Number</b>	<b>Ongoing MTW Activity</b>	<b>Description</b>	<b>Statutory Objective</b>	<b>Authorization</b>
2009-01	\$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)
2011-01	Choose to Own Homeownership Program for Public Housing and HCV	CHA expanded the Choose to Own (CTO) Home Ownership Program beyond HCV participants to current CHA public housing residents.	Increase Housing Options Self- Sufficiency	Attachment D, Paragraph 21
2014-01	Modified Family Self-Sufficiency Program for HCV and Public Housing Participants	CHA received approval to revise the participation requirements for the Family Self-Sufficiency program for public housing and HCV participants	Self- Sufficiency	Attachment C, Section E
<b>Public Housing</b>				
<b>MTW Activity Number</b>	<b>Ongoing MTW Activity</b>	<b>Description</b>	<b>Statutory Objective</b>	<b>Authorization</b>
2009-02	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



## Section IV: Approved MTW Activities: HUD Approval Previously Granted

FY2015 Implemented MTW Activities				
Public Housing				
MTW Activity Number	Ongoing MTW Activity	Description	Statutory Objective	Authorization
2008-01	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 liaison between residents and CHA leadership.	Self-Sufficiency	Attachment D, Paragraph 20
HCV				
MTW Activity Number	Ongoing MTW Activity	Description	Statutory Objective	Authorization
2006-01	Biennial Re-examinations for HCV	CHA currently conducts biennial re-examinations for HCV Program participants	Reduce Costs and Cost Effectiveness	Attachment C, Section D (1) (c)
2010-02	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)
2011-02	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)
2011-03	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)
PRA				
MTW Activity Number	Ongoing MTW Activity	Description	Statutory Objective	Authorization
2011-04	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)
2008-02	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

## Section IV: Approved MTW Activities: HUD Approval Previously Granted

FY2015 Implemented MTW Activities				
PRA				
MTW Activity Number	Ongoing MTW Activity	Description	Statutory Objective	Authorization
2011-05	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)
2011-06	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)
2011-07	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)
2011-08	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
FY2015 Not Yet Implemented MTW Activities				
Public Housing and HCV				
MTW Activity Number	Ongoing MTW Activity	Description	Statutory Objective	Authorization
2014-02	Triennial Re-examinations for Households with only Elderly/Disabled Participants and Fixed Income for HCV and Public Housing	CHA proposes to implement a streamlined triennial re-examination schedule for public housing and HCV fixed income households consisting of only elderly and/or disabled participants.	Reduce Costs and Cost Effectiveness	Attachment C, Section C (4) and Attachment C, Section D (1)(c)
2014-04	CHA Re-Entry Pilot Program	CHA received HUD approval to implement a Re-entry Pilot Program for up to 50 eligible participants in CHA traditional public housing or CHA's HCV Program.	Increase Housing Options	Attachment C, Section B(4)
Public Housing				
MTW Activity Number	Ongoing MTW Activity	Description	Statutory Objective	Authorization
2014-03	Biennial Re-examinations for Public Housing	CHA plans to implement biennial re-examinations for public housing residents to review family circumstances, income, assets, expenses, and family composition to establish continued eligibility for public housing.	Reduce Costs and Cost Effectiveness	Attachment C, Section C (4)

### **Activities on Hold**

The following MTW activities are on hold for FY2015.

#### ***Owner Excellence - Biennial Inspections (2014-03)***

- **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)
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:** In response to HUD implementation of FY2014 Appropriations Provision Section 220, CHA has decided to place this activity on hold for FY2015.

#### ***Authorization of Qualified PRA Owners/Property Managers to Perform Annual Inspections (2011-10)***

- **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:** This activity is on hold for FY2015. CHA is evaluating how inspection procedures may be more consistent across the agency and may make changes to this activity.
- **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.

### **Closed Out Activities**

The following activities were closed out by CHA in FY2014 and will not be implemented in FY2015 or in future years.

#### ***All Clear Utility Debt Assistance Program (2013-01)***

- **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:** CHA has decided to close out this activity. For the past several years, no CHA funds have been used for this activity, which is the only MTW flexibility required. ComEd continues to cover the costs of this program. CHA will discontinue this program in the future if ComEd determines it will no longer fund 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.

***Elimination of Assets in Income Calculation After Initial Eligibility for HCV (2011-11) and Public Housing (2014-05)***

- **Description and Impact:** In FY2014, CHA received approval 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 no longer includes 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 (HCV), approved FY2014 (Public Housing)
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:** CHA has determined it will close out this activity for HCV and will not implement this activity for public housing. CHA has decided to follow the guidance issued in the HUD PIH notice 2013-03 and extended in PIH Notice 2013-26, which simplifies asset calculations, instead of continuing this MTW activity. In addition, CHA is exploring future policy changes that may impact asset calculations as part of Phase 2 of Uniform Housing Policy.
- **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.

***Reasonable Cost Formula and Methodologies for Rehabilitation (2008-03)***

- **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:** Based on HUD approval of the expansion of CHA's *Reasonable Cost Formula and Methodologies for Redevelopment* to include both redevelopment and rehabilitation activities, CHA has closed out this activity

in FY2014 and will no longer use the alternative reasonable cost limitations for rehabilitation that were established and approved in FY2008.

- 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.





**Section Five**  
**MTW Sources and Uses of Funds**



## **Section V: MTW Sources and Uses Funds**

This section contains information on CHA's anticipated sources and uses of funding in FY2015.

### **Section V-A: Sources and Uses of MTW Funds**

#### ***Estimated Sources of MTW Funding for FY2015***

The following table shows projected sources of MTW funding in FY2015.

<b>Sources</b>		
<b>FDS Line Item</b>	<b>FDS Line Item Name</b>	<b>Dollar Amount</b>
70500 (70300+70400)	Total Tenant Revenue	\$49,090,886
70600	HUD PHA Operating Grants	\$693,163,677
70610	Capital Grants	\$112,948,734
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$68,550
71100+72000	Interest Income	\$3,047,500
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$10,712,723
70000	Total Revenue	\$869,032,070

#### **Explanations of CHA FY2015 MTW Sources:**

- FY2015 estimates for operating subsidies and Housing Choice Voucher Program sources are based on FY2014 funding levels.
- CHA anticipates utilizing reserves for capital expenditures. Those reserves are not reported as FDS line items and are not reflected as sources above.



**Estimated Uses of MTW Funding for FY2015**

The following table shows projected uses of MTW funding in FY2015.

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$43,069,672
91300+91310+92000	Management Fee Expense	\$0
91810	Allocated Overhead	\$34,351,449
92500 (92100+92200+92300+92400)	Total Tenant Services	\$66,075,532
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$27,893,200
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$70,573,019
95000 (95100+95200+95300+95500)	Total Protective Services	\$27,453,750
96100 (96110+96120+96130+96140)	Total insurance Premiums	\$5,641,000
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$17,138,943
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$1,062,894
97100+97200	Total Extraordinary Maintenance	\$10,000,000
97300+97350	Housing Assistance Payments + HAP Portability-In	\$436,268,712
97400	Depreciation Expense	\$157,074,382
97500+97600+97700+97800	All Other Expenses	\$946,392
90000	Total Expenses	\$897,548,945

**Explanations of CHA FY2015 MTW Uses:**

- The estimated Housing Assistance Payments expense is based on increased voucher utilization in FY2015.
- Uses do not reflect planned capital expenditures described in Section II. These are not reported as FDS line items.
- Depreciation is included in Uses based on the FDS line item. CHA reports depreciation as an expense (rather than a use), per standard accounting practices.

**Activities that Used Only MTW Single-Fund Flexibility**

The following section describes CHA's use of MTW single-fund flexibility.

**Describe the Activities that Used Only MTW Single Fund Flexibility**

The table below outlines CHA's use of the MTW single fund for FY2015, with projected expenditures by category based on CHA's FY2015 budget. (This includes projected reserve expenditures of \$107.3M, which are outlined at the end of this section.)

CHA continues to use single fund flexibility by designing and/or continuing to implement local activities, including new initiatives related to Plan Forward as described in Section I.

CHA uses capital dollars as well as Section 8 MTW Block 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. Section II describes capital expenditures and specific development and capital activities planned for FY2015.

Through the use of MTW funds, CHA also continues to implement numerous resident service initiatives including Support to Families Being Relocated, Self-Sufficiency Services, Youth Empowerment Services and Quality of Life Services. (More detail on resident services initiatives is provided in the below section.)

**THE CHICAGO HOUSING AUTHORITY  
USE of MTW SINGLE FUND  
FY2015 ANNUAL PLAN**

	<b>FY2015</b>
<b>CENTRAL OFFICE</b>	<b>\$ 41,890,661</b>
<b><u>HOUSING</u></b>	
Housing Choice Voucher	454,901,422
Asset Management	177,093,521
Resident Services	39,065,572
Housing Administration	598,015
<b>TOTAL HOUSING</b>	<b>671,658,530</b>
<b><u>CAPITAL</u></b>	
Capital Repairs and Improvements	165,365,292
Capital Development	69,454,000
Capital Administration	4,655,453
<b>TOTAL CAPITAL</b>	<b>239,474,745</b>
<b>DEBT SERVICE</b>	<b>2,296,000</b>
<b>TOTAL USES</b>	<b>\$ 955,319,936</b>

**Current 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 Plan Forward. 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, as well as select services to other HCV residents. These services focus on four main goals, each with measurable outcomes, including permanent housing choices, lease compliance, and employment preparation, placement and retention. A summary of the services planned for 2015 is below.

#### *Increasing Economic Independence:*

- **Transition counseling.** Assistance for families to overcome social and emotional barriers to leaving subsidized housing.
- **Housing locator assistance.** Help finding appropriate, affordable housing in the private or affordable market for families transitioning off of subsidy or moving to an Opportunity Area.
- **Choose to Own homeownership program.** Financial assistance toward the mortgage payment, pre- and post-purchase homebuyer education, credit counseling and other services to help families navigate the home-buying process.
- **Family Self-Sufficiency program.** Focused assistance in reaching self-sufficiency goals, including escrow accumulation.

#### Projected FY2015 Outcomes:

- More than 25 families will purchase a home through Choose to Own.
- More than 100 families will graduate from the Family Self-Sufficiency program.

#### *Increasing Earning Power:*

- **Employment placements.** Job readiness training to prepare residents for work; assistance finding a job; follow-up to foster, promote, and enhance job retention.
- **Transitional Jobs.** Time-limited, subsidized jobs with a training component to help residents transition to permanent employment.
- **Employment readiness and placement for youth.** Starting in elementary school, career exploration programming. For older youth, job readiness training and summer placements with ongoing support.
- **Section 3.** Assist residents with registration in the new Section 3 database in order to apply for posted positions with CHA contractors.

#### Projected FY2015 Outcomes:

- More than 1,200 residents will be connected with new and better jobs.
- More than 2,000 youth will be engaged in paid summer opportunities.

#### *Developing Academic Achievement:*

- **Connections to education.** Coaching and support in accessing post-secondary education, including at the City Colleges of Chicago, where residents can attend at no cost after financial aid.
- **Scholarships.** CHA offers scholarships in amounts of \$1,000 and \$2,500 for youth and adults attending college.

- **Academic enrichment for youth.** Programs for middle school and high school aged youth to expand academic skills and prevent summer learning loss with the goal of preparing youth for college or other post-secondary education.

Projected FY2015 Outcomes:

- More than 500 residents will attend the City Colleges of Chicago.
- More than 200 youth and adults will receive CHA college scholarships.

*Increasing Stability and Quality of Life:*

- **Recreational programming for youth.** Sports, wellness and arts programs for youth starting at age six, including through the Chicago Park District, as well as special events throughout the year.
- **Lease violation referrals.** Assistance for families referred by their property manager to help them address lease violation issues.
- **Right of Return outreach.** Outreach and assistance for 10/1/99 families who still need to satisfy their Right of Return under the Relocation Rights Contract.
- **Clinical mental health services.** Individual and group counseling for any resident who needs it.
- **Victim Assistance.** Referral to counseling services and, if appropriate, relocation for residents who have been victims of violent crimes or trauma and who need to move for safety reasons.
- **Health initiatives.** Opportunities with CHA partners to address specific health issues such as asthma and cardiovascular health. For seniors, exercise and dance classes, health seminars, frail and emergency well-being checks, and crisis intervention.
- **Social events for seniors.** On-site, regional and city-wide activities such as clubs, classes, field trips and music events.
- **Assessments and outreach for seniors.** Ongoing one-on-one contact with seniors to identify and address issues and engage them in activities.
- **Senior referrals.** Connections to outside resources, such as assistance getting benefits, housekeeping services and transportation assistance. Many services are provided by the City of Chicago's Department of Family and Support Services (DFSS).

Projected FY2015 Outcomes:

- More than 7,000 youth will engage in out-of-school-time programs with CHA and its partners throughout the year.
- Regional senior music fests and the Senior Holiday Luncheon will engage more than 2,000 seniors.

**CHA Reserves**

Total reserve fund usage budgeted for FY2015 is \$107.3M.

- Reserve funds will be used for repair and maintenance at senior housing properties (\$57.8M), scattered site properties (\$13.3M), and family properties (\$6.4M).
- Reserve funds will also be used to develop mixed-income projects (\$12.4M).
- Additionally, reserve funds will be used to fund resident service initiatives (\$17.4M).
- Remaining reserve funds will be used for future capital projects.

## Section V-B: Local Asset Management Plan

## Local Asset Management Plan

Has the PHA allocated costs within statute during the plan year?  
 Has the PHA implemented a local asset management plan (LAMP)?

No

Yes

If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. It shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.

Has the PHA provided a LAMP in the appendix?

Yes

CHA implemented a Local Asset Management Plan (LAMP) in FY2008 and, though the basic components of the plan have not changed materially, CHA continually looks to ensure that the activities, accounting, and financial reporting are in keeping with the LAMP. Examples of CHA activities taken to ensure our LAMP is operating as designed include:

- The CHA property portfolio continues to be managed by professional private management companies with performance metrics and standards identified in their contracts;
- Budgeting and accounting activities are managed at the property level with a robust budgeting program in place that requires substantial internal CHA review be performed prior to approval;
- Detailed accounting activities and financial analysis efforts are performed monthly to ensure that property expenditures are within budget guidelines and appropriately reported.

CHA makes every effort to ensure that program costs are reasonable and consistently applied in accordance with the Moving to Work Agreement by recording accounting activity at the grant and property levels. As identified in the LAMP, CHA utilizes property level management, accounting, and budgeting and has established a Central Office Cost Center (COCC). Internal control considerations are a priority for the CHA and are evident in the manner in which expenditures are budgeted, authorized and reported on. Reviews are routinely performed to make certain that the appropriate segregation of duties and approval authority are in place for CHA staff and management.

Further, CHA makes certain that Generally Accepted Accounting Principles are followed by having external firms perform the required annual financial and A-133 audits. These annual audits, in addition to the quarterly reviews performed by the external firm, require significant consideration be given to program reporting as well as up-to-date accounting treatment of Governmental Accounting Standards Board (GASB) pronouncements.





## **Section Six**

### **Administrative**



## Section VI: Administrative

This section contains administrative requirements and certifications that are to be submitted in CHA's MTW Annual Report.

### Board Resolution



October 15, 2014

Item No. 3

#### RECOMMENDATION TO APPROVE CHA'S PROPOSED FY2015 MOVING TO WORK ANNUAL PLAN

To the Honorable Board of Commissioners:

##### RECOMMENDATION

It is recommended that the Board of Commissioners approve the attached FY2015 Moving to Work (MTW) Annual Plan 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 and 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 FY2015 MTW Annual Plan fulfills CHA's annual reporting requirements and supports CHA's goal of continued successful compliance with the obligations of HUD's Moving to Work Demonstration Program. The Proposed FY2015 MTW Annual Plan 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

CHA and HUD signed the original Moving to Work (MTW) Agreement on February 6, 2000 which allowed CHA to implement the original Plan for Transformation. CHA's Amended and Restated MTW Agreement with HUD was fully executed on June 26, 2008 which extended CHA's participation in the MTW Demonstration Program through FY2018.

In April 2013, 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. As CHA implements Plan Forward initiatives, the agency will continue to pursue the three statutory objectives of the MTW Demonstration Program:

- *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.



As part of the MTW Agreement, CHA is required to submit an Annual Plan to HUD, due 75 days prior to the start of CHA's fiscal year. The MTW Annual Plan provides required information on planned operations and activities for the fiscal year, including proposed new MTW activities that require HUD approval.

In May 2013, HUD issued a revised Form 50900 (Attachment B to the Amended and Restated MTW Agreement) which outlines new requirements for the content of MTW Annual Plans/Reports and for tracking the impact of MTW activities. CHA's Proposed FY2015 MTW Annual Plan is the first annual plan document in which CHA must fully adopt these new reporting requirements. CHA continues to work with HUD to ensure compliance with the new Form 50900.

Prior to submission of the Proposed FY2015 MTW Annual Plan to the Board, a 30-day public comment period was conducted from September 3 through October 3, 2014. Announcements for the public comment process appeared on CHA's website and in the Chicago Defender (September 3 and 10) and Chicago Sun-Times and Hoy newspapers (Sept 3-9, 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 FY2015 MTW Annual Plan. CHA held two public hearings during the comment period, on September 17 and September 18, 2014. Prior to finalizing the Proposed FY2015 MTW Annual Plan, 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. Due to CHA's October Board schedule, HUD has extended the deadline for submitting the Proposed FY2015 MTW Annual Plan to October 24, 2014.

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 FY2015 MTW Annual Plan.

The CEO recommends the approval of the Proposed FY2015 MTW Annual Plan and submission to HUD by the deadline of October 24, 2014.

Based upon the foregoing, it is recommended that the Board approve the Proposed FY2015 MTW Annual Plan 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 FY2015 MTW Annual Plan to HUD for approval by the deadline of October 24, 2014.

**RESOLUTION NO. 2014-CHA-100**

**WHEREAS**, the Board of Commissioners has reviewed the Board Letter dated October 15, 2014 requesting approval of the Proposed FY2015 MTW Annual Plan, attached hereto;

**THEREFORE BE IT RESOLVED BY CHICAGO HOUSING AUTHORITY**

**THAT** the Board of Commissioners hereby approves the FY2015 MTW Annual Plan, and the form, *Certifications of Compliance with Regulations* from Attachment B to the Amended and Restated MTW Agreement.

**THAT** the Board of Commissioners ("Board") authorizes the Chief Executive Officer or his designee to approve any final changes to the Proposed FY2015 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 Proposed FY2015 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 Proposed FY2015 MTW Annual Plan to the U.S. Department of Housing and Urban Development by the deadline of October 24, 2014.



Chicago Housing Authority  
60 E. Van Buren  
Chicago, IL 60605  
312-742-8500  
[www.thecha.org](http://www.thecha.org)



August 12, 2015

Item No. 5

**RECOMMENDATION TO APPROVE CHA'S  
PROPOSED FY2015 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 FY2015 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 FY2015 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 FY2015 MTW Annual Plan. A 30-day public comment period was conducted from July 6 through August 5, 2015. Announcements for the public comment process appeared on CHA's website and in the Chicago Defender (July 8 and July 15) and Chicago Sun-Times and Hoy newspapers (July 6-July 10).

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 FY2015 MTW Annual Plan Amendment. CHA held a public hearing during the 30-day comment period, on July 15, 2015.

Prior to finalizing the Proposed FY2015 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 FY2015 MTW Annual Plan Amendment.

The CEO recommends the approval of the Proposed FY2015 MTW Annual Plan Amendment and submission to HUD upon Board approval.

Based upon the foregoing, it is recommended that the Board approve the Proposed FY2015 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 FY2015 MTW Annual Plan Amendment to HUD for approval.

**RESOLUTION NO. 2015-CHA-64**

**WHEREAS,** the Board of Commissioners has reviewed the Board Letter dated August 12, 2015 requesting approval of the Proposed FY2015 MTW Annual Plan Amendment, attached hereto;

**THEREFORE BE IT RESOLVED BY CHICAGO HOUSING AUTHORITY**

- THAT** the Board of Commissioners hereby approves the Proposed FY2015 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 FY2015 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 FY2015 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.



Chicago Housing Authority  
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**Annual MTW Plan Certifications of Compliance**

OMB Control Number: 2577-0216  
Expiration Date: 5/31/2016

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report	
Attachment B	
<b>Certifications of Compliance</b>	
Annual Moving to Work Plan Certifications of Compliance	U.S. Department of Housing and Urban Development Office of Public and Indian Housing
<b>Certifications of Compliance with Regulations:</b> <b>Board Resolution to Accompany the Annual Moving to Work Plan*</b>	
<p>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 _____, 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:</p> <ol style="list-style-type: none"> <li>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 conducted a public hearing to discuss the Plan and invited public comment.</li> <li>2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) 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.</li> <li>3. The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1.</li> <li>4. 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.</li> <li>5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.</li> <li>6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.</li> <li>7. The PHA will affirmatively further fair housing by examining its 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.</li> <li>8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.</li> <li>9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.</li> <li>10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.</li> <li>11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.</li> <li>12. 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.</li> </ol>	

Attachment B  
1



OMB Control Number: 2577-0216  
Expiration Date: 5/31/2016

13. 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.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105( a).
15. The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
16. 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.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
19. 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).
20. 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.
21. 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

IL002  
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, Board of Commissioners  
Title

  
Signature

10 - 23 - 14  
Date

\*Must be signed by either the Chairman or Secretary of the Board of the PHA's legislative body. This certification cannot be signed by an employee unless authorized by the PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.

**Public Comment Info and Grid**

Prior to submission of the Proposed FY2015 MTW Annual Plan for CHA Board approval, a 30-day public comment period was conducted from September 3 through October 3, 2014. CHA held two public hearings during the comment period, on September 17 (Charles Hayes Family Investment Center, 4859 S. Wabash) and September 18 (CHA Main Office, 60 E Van Buren). A total of 11 people participated in these hearings. The following table includes public comments and CHA responses.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
1	Nene	I see the Chicago Housing Authority is finally making some progress. This is wonderful. The question I have is, when the public and section 8 housing wait list open, will it be a lottery system or will the CHA just add a certain amount of names to both waiting lists regardless of date and time when the applicant applied?	Thank you for your comment. CHA will use a lottery system to select applicants.
2	Nene	When will the Chicago Housing Authority start converting their public housing units into housing choice vouchers?	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. As encouraged by HUD, CHA is preparing for RAD implementation in the event a future RAD award is received.
3	Nene	When the waiting list re-opens at the end of FY 2014 will people be able to apply through happy software waitlist check? Wait list check is more convenient because people who names make the actual wait list can get on wait list check 24 hours a day 7 days a week and to check their wait list status, instead of calling into CHA everyday to check their status.	Thank you for your comment. CHA will maximize the use of technology to streamline, whenever possible, processes.



Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
4	Robert Whitfield	<p>CHA, for the first time since the beginning of the CHA Plan for Transformation in 2000, has added an additional public hearing at a location other than Charles Hayes Family Investment Center (FIC). It is encouraging that CHA has recognized that more than a single public hearing is required on what CHA has consistently described on the CHA website as: "the largest and most ambitious redevelopment effort of public housing in the history of the United States".</p> <p>However, given the scope and complexity of the CHA Plan for Transformation, the enormous size of the CHA Housing Choice Voucher (HCV) program; and the involvement of the Gautreaux court decision (the longest continuous Federal litigation in U.S. history) in CHA redevelopment plans, CHA should have additional public hearings at different locations and times in order to maximize involvement and participation by public housing residents, HCV participants and members of the general public, and communities near and around current and future CHA redevelopment. CHA should consider adding public hearing sites in north and west sides of the city, and holding at least one public hearing in an area with a significant Hispanic population.</p> <p>CHA should also consider having one public hearing in a senior building during early afternoon hours to ensure that CHA seniors also have an opportunity to participate without concern over transportation or safety. This is especially appropriate going forward because of the stated CHA intent to participate in the new Federal Rental Assistance Demonstration (RAD) program and to eventually convert all CHA senior buildings from public housing to project based Section 8. CHA could use the public hearings in CHA senior buildings to further explain the CHA RAD initiative in senior buildings, and to respond to questions and concerns from CHA seniors.</p>	<p>CHA continuously works to improve and adapt the public comment process as necessary. CHA held two public comment hearings during the comment period. Public hearings are not the only medium for comment during the public comment period.</p> <p>CHA has communicated in a variety of ways, including resident meetings, to residents potentially affected by a future RAD award.</p>
5	Robert Whitfield	<p>I have reviewed the Federal statutes and regulations governing the submission of draft Annual Plans by MTW agencies. There is nothing in the statutes and or regulations that preclude CHA from extending the time period for public comment on the draft CHA FY 2015 MTW Annual Plan; or in the alternative, from continuing to solicit public comments for an additional period after its submission of the draft Annual Plan, and then submitting those additional comments to the U.S. Department of Housing and Urban Development (HUD) for review and consideration prior to HUD approval of the CHA FY 2015 MTW Annual Plan.</p>	<p>There is no additional time available. CHA has to consider public comments prior to submission to HUD by the October 24, 2014 deadline.</p> <p>CHA continuously works to improve and adapt the comment process.</p>

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
6	Robert Whitfield	<p>The draft CHA FY 2015 MTW Annual Plan continues to delay the rehabilitation of public housing units at Lathrop Homes, and the Cabrini Row Houses as part of its mixed finance redevelopment plan. CHA has consistently stated that its decisions not to rehabilitate more public housing at these north side sites is to avoid pockets of minority concentration, or as the Chicago Sun Times stated (in error, in my opinion), to avoid the mistakes of the past, a reference to the decision in the Gautreaux court case. However, CHA cannot rely on rulings in that case to justify decisions to limit the rehabilitation of public housing at Lathrop Homes and or the Cabrini Row Houses. The Seventh Circuit Court of Appeals issued a decision in 1982 that clearly states that nothing in that case precludes the construction (or rehabilitation of public housing in minority areas. The specific language in that 1982 Appellate Court decision reads as follows: It is not a constitutional violation to place assisted housing in areas with a substantial minority population. As adjudicated in this case, it is a constitutional violation to do so in order to limit assisted housing projects in areas with substantial minority populations. (See Gautreaux v Pierce, 690 F.2d 616 7th Cir. 1982) It is clear that the rehabilitation of additional public housing at Lathrop Homes and or the Cabrini Row Houses would not be for the purpose of limiting public housing in minority areas because of race. In fact, the refusal to rehabilitate more public housing at these sites (which are already in integrated areas - and the only family CHA public housing developments on the north side) would have the opposite effect. If less public housing is returned at these sites, which is the current CHA plan, it will mean that those with a right to return, and or new applicants, will be required to accept public housing in concentrated minority areas on the west and south sides of the City; or accept Housing Choice Vouchers (HCV). CHA data indicates that HCV usage is also concentrated in heavily minority areas of the City, which means that neither option will lead to more integration of low income residents, and actually result in additional concentration in neighborhoods with a substantial minority population, the exact opposite of what Gautreaux was intended to remedy. Accordingly, CHA should modify its current redevelopment plans to provide for the immediate rehabilitation of additional public housing at Lathrop Homes and the Cabrini Row Houses.</p>	Thank you for your comment.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
7	Robert Whitfield	<p>Good morning. The following are additional comments on the Chicago Housing Authority (CHA) draft FY 2015 Moving to Work (MTW) Annual Plan. The prior initial comments on the draft CHA FY 2015 MTW Annual Plan raises concerns that CHA has not provided sufficient time for public hearing and comment on an Annual Plan that CHA states is the largest and most comprehensive redevelopment of public housing in the nation. The current MTW Agreement approved by the U.S. Department of Housing and Urban Development (HUD) states that the PHA MTW Annual Plan must be submitted at least 75 days prior to the beginning of the PHA fiscal year. The CHA's fiscal year begins on January 1st, which would require submittal of the draft CHA MTW Annual Plan by October 17th.</p> <p>However, the HUD approved CHA MTW Agreement also provides that if the PHA MTW Annual Plan is not received prior to the above 75 day period, then the draft MTW Plan will only be approved after notification from HUD; as opposed to the provision allowing automatic approval if HUD has not responded within the specific time period set forth in the MTW Agreement. Therefore, CHA could delay submitting the draft CHA FY 2015 MTW Plan to allow additional public hearings and public comments without any significant adverse impact on CHA operations and or programs. The provision of an additional 30 day comment period, and the provision of additional public hearings at additional sites throughout the City, should be embraced by CHA officials, and encouraged by HUD, to provide increased public and CHA resident (and CHA HCV participant) confidence and trust in CHA public housing redevelopment and program activities. This is critically needed due to the size and complexity of the CHA Plan, and the unique and contested issues at major sites like the Cabrini Row Houses, Lathrop Homes, Ickes Homes, LeClaire, and Henry Horner Homes. The litigation that resulted in the Latino Consent decree is further evidence of the complexity of issues related to CHA, and the potential impact on minority residents and applicants.</p>	<p>Per the MTW Agreement, CHA's MTW Annual Plan is due to HUD 75 days prior to the start of the fiscal year. Due to the timing of CHA Board approval of the FY2015 MTW Annual Plan, HUD has extended the submission deadline to October 24, 2014. The 75-day HUD response period will still be in effect when CHA complies with the extended deadline.</p> <p>CHA continuously works to improve and adapt the comment process.</p>

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
8	Robert Whitfield	There is also a question whether the issuance of the draft CHA FY 2015 MTW Annual Plan is in accord with the requirements of 24 CFR Part 903, the Federal regulations governing PHA Annual Plans. My review of the HUD approved CHA MTW Agreement indicates that HUD approved a waiver of certain parts of Part 903. However, The CHA MTW Agreement (and the MTW Amendments) do not contain any provision waiving a specific part of 24 CFR 903. If that is so, then CHA is required to consult with the Central Advisory Council (CAC), in its capacity as the CHA Resident Advisory Board (RAB) in the development of the draft CHA MTW Annual Plan. The issuance of the draft CHA FY 2015 MTW Annual Plan, and CHA providing copies of the draft to the CAC, is not consultation, and is not consistent with the specific requirement set forth at 24 CFR 903.13. CHA did not meet with or consult with the CAC, or its representatives, in its preparation of the draft CHA MTW Plan. HUD should require CHA to meet with the CAC (and the CHA HCV RAB) on the draft CHA FY 2015 MTW Annual Plan prior to approval of the draft CHA Plan. This could be done during an extended public comment period on the draft CHA FY 2015 MTW Annual Plan.	CHA has complied with the applicable requirements in accordance with its MTW Agreement.
9	Charles Barlow	1) I am grateful that—as with the public comment process on the Proposed FY2014 MTW Annual Plan Amendment and Updates to the ACOP and HCV Administration Plan—the Chicago Housing Authority offered more than one public comment hearing for the Proposed FY2015 MTW Annual Plan. I hope that this trend continues for future public comment periods. I would, however, recommend that public hearings be offered at different times of the day (e.g. mornings as well as evenings) and at a greater number of locations, particularly to encourage participation from senior public housing residents who might not be able to travel great distances or fear for their personal safety but nevertheless wish to make an oral comment on proposed Chicago Housing Authority policies. Furthermore, it would be particularly helpful to consider additional public comment hearings in and around sites of proposed and on-going (re-)development of housing. In particular, the Chicago Housing Authority lacked sufficient engagement with the North and West sides of the city of Chicago during this public comment process, and did not hold a public comment hearing in a majority-Hispanic area.	CHA continuously works to improve and adapt the public comment process as necessary. CHA held two public comment hearings during the comment period. Public hearings are not the only medium for comment during the public comment period.
10	Charles Barlow	2) The Chicago Housing Authority states numerous times in blue typeface throughout the document that particular sections of the document will be updated prior to submission to the United States Department of Housing and Urban Development. Since the draft document is to receive substantive and material amendments following the conclusion of this public comment process, the final draft document should be re-released for public comment prior to approval by the Board of Commissioners and submittal to the United States Department of Housing and Urban Development. During a recent public comment process—for	CHA continuously works to improve and adapt the public comment process. The public comment grid is provided to CHA's Board of Commissioners prior to approval of documents that require public comment and the Board is informed of changes to the annual plan. Final, Board-approved documents are made available to the public on CHA's website, including associated

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
		the Proposed FY2014 MTW Annual Plan Amendment and Updates to ACOP/HCV Administrative Plan—the Board of Commissioners voted to approve the documents before reviewing amendments that the Chicago Housing Authority proposed and without further public consultation on proposed amendments. Moreover, the Board of Commissioners approved the documents before the comment grid was released to the public, meaning that members of the public were unable to comment on the response of the Chicago Housing Authority to the public comments. I sincerely hope that the Board of Commissioners does not vote on the approval of the Proposed FY2015 Moving to Work Annual Plan prior to granting the public the opportunity to review the Chicago Housing Authority's response to all comments received in this public comment period.	public comments and CHA responses, after Board approval.
11	Charles Barlow	3) The Chicago Housing Authority states that it intends to submit the Proposed FY2015 Moving to Work Annual Plan for Board of Commissioners approval on October 21st, and then intends to submit the document for approval by the United States Department of Housing and Urban Development on October 23rd. The federal regulations do not preclude the extension of the public comment period beyond thirty (30) days, nor do the regulations preclude the Chicago Housing Authority from soliciting additional comments for an additional period after submission on October 23rd for consideration and review prior to approval of the document. In fact, the federal regulations require that the Annual Plan be submitted at least seventy-five (75) days prior to the beginning of the fiscal year of the Public Housing Authority. Given that the Chicago Housing Authority's fiscal year begins on January 1st, submitting this document after October 17th would mean that it is already considered late. Fortunately, the United States Department of Housing and Urban Development stipulates that if an Annual Plan is submitted late, the only consequence is that there is no provision for automatic approval in the event that the United States Department of Housing and Urban Development fails to respond within a specified period of time. Consequently, given that the Annual Plan will be submitted late anyway, the Chicago Housing Authority could readily delay the submission of its Annual Plan until additional public comment hearings have been held and/or conduct an additional comment period after its Annual Plan has been submitted, with comments and responses submitted in advance of approval by the United States Department of Housing and Urban Development.	Per the MTW Agreement, CHA's MTW Annual Plan is due to HUD 75 days prior to the start of the fiscal year. Due to the timing of CHA Board approval of the FY2015 MTW Annual Plan, HUD has extended the submission deadline to October 24, 2014. The 75-day HUD response period will still be in effect when CHA complies with the extended deadline. CHA continuously works to improve and adapt the comment process.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
12	Charles Barlow	4) When tables are used by the Chicago Housing Authority to expand upon 'Standard Metrics' for the Approved and Proposed Moving to Work activities, the year from which data is taken for the 'Baseline' column appears somewhat arbitrary. At times, the Chicago Housing Authority utilizes 'Implementation Year' as its baseline, but not always. It would be helpful to see some consistency here. Moreover, using time periods that are several years in the past can be deceptive. For example, if a Moving to Work Activity was implemented in FY2009 and the 'FY2015 Benchmark' is considerably 'better' than the 'Baseline' from FY2009, one would assume that the Activity is operating well. However, without information from the most recent year available in the Moving to Work Annual Reports (i.e. FY2013) it is impossible to evaluate the true effectiveness of the Moving to Work Activity. It would be helpful—even if it is not specifically required by the United States Department of Housing and Urban Development—to provide more information in its 'Standard Metrics' sections by providing not only consistent baseline data, but also data from the most recently approved Moving to Work Annual Plan.	CHA followed new HUD requirements in the new Form 50900 (effective May 2013) in establishing standard metrics for MTW activities. CHA continues to follow HUD guidance for tracking standard metrics.
13	Charles Barlow	1) The Chicago Housing Authority states "CHA's Amended and Restated MTW Agreement with HUD was fully executed on June 26, 2008 which extended CHA's participation in the MTW Demonstration Program through FY2018" (page 6). Does the Chicago Housing Authority anticipate fulfillment of the original Plan for Transformation goal of rehabilitating or redeveloping 25,000 housing units in Chicago by this date? If not, what are the intentions of the Chicago Housing Authority to ensure that the goal is met following the expiration of the Chicago Housing Authority's participation in the Moving to Work Demonstration Program?	CHA continues to pursue existing and new strategies to achieve the 25,000 unit goal to fulfill the obligations of the MTW Agreement.
14	Charles Barlow	2) The Chicago Housing Authority states "New Plan Forward initiatives are being developed to respond to local housing preferences and market opportunities" (page 7). In the interest of transparency, please elaborate on the nature and scope of these new Plan Forward initiatives, and explain how—if at all—these new initiatives will impact the Chicago Housing Authority's ability to achieve the original Plan for Transformation unit delivery goal?	CHA continues to pursue existing and new strategies to achieve the 25,000 unit goal to fulfill the obligations of the MTW Agreement. CHA provides updates on unit delivery strategies in annual plans and reports and seeks HUD approval as necessary.
15	Charles Barlow	3) The Chicago Housing Authority states that it anticipates that 763 units (68.8%) of its projected FY2015 unit delivery will come from Project-Based Vouchers: 228 via the Property Rental Assistance Program, 185 via Preservation Strategies, and 350 via Sponsor-based Housing. While the Chicago Housing Authority has already received authorization from the United States Department of Housing and Urban Development to count Project-Based Voucher units towards its unit delivery goals, please provide justification for pursuing this strategy to contribute the majority of units in FY2015 when Project-Based Vouchers are not 'hard' units, i.e. these units are neither rehabbed existing units within the Chicago Housing Authority's portfolio, nor the redevelopment of former Chicago Housing	CHA continues to provide and expand a variety of affordable housing options for low income housing families in Chicago. CHA also continues to pursue existing and new strategies to achieve the 25,000 unit goal to fulfill the obligations of the MTW Agreement and seeks HUD approval as necessary.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
		Authority properties in line with the Chicago Housing Authority's original Plan for Transformation goal to "rehabilitate or redevelop 25,000 housing units in Chicago".	
16	Charles Barlow	4) The Chicago Housing Authority states that it anticipates that 185 units (16.7%) of its projected FY2015 unit delivery will come from Preservation Strategies. Further, the Chicago Housing Authority expands upon 'Preservation Strategies' by stating that "CHA plans to support local preservation strategies to ensure long-term affordability of existing non-CHA properties is maintained" (page 7). Given the extent of the projected unit delivery via Preservation Strategies, please elaborate further as to the nature and scope of "local preservation strategies". What do these strategies entail? Please identify specific examples and geographic locations of where this initiative is to be implemented during FY2015.	CHA supports local preservation strategies to ensure long-term affordability of existing affordable housing in Chicago through the use of project-based vouchers. In FY2015, CHA will provide PBV assistance at Kenmore Plaza Apartments through the preservation strategy as indicated in Section II.
17	Charles Barlow	5) The Chicago Housing Authority states "In FY2015, CHA plans to propose Phase 2 of Uniform Housing Policy, which will explore changes to streamline rent and utility allowance structures in public housing and HCV as well as strategies to encourage work and self-sufficiency" (page 8). On June 13th, 2014, Chicago Housing Authority staff, Mary Howard and Tim Veenstra, met with the Central Advisory Council to review Phase 1 of the Uniform Housing Policy. Complaints were raised by Local Advisory Council Presidents about the lack of inclusion of the Central Advisory Council's recommendations in Phase 1, and both Chicago Housing Authority staff members concurred that some of the Central Advisory Council's recommendations—from the 2012 Strategies and Recommendations Report—would be included in Phase 2; however, this is not the case. Why are the recommendations of the Central Advisory Council not found in Phase 2 of the Uniform Housing Policy?	CHA will hold meetings with the CAC in order to discuss additional policies. As indicated in the annual plan, CHA will engage residents and other stakeholders in Phase II.
18	Charles Barlow	6) The Chicago Housing Authority states that it intends "to utilize RAD . . . over the next two years (2014-2015)" (page 8). Given that "CHA learned that the 60,000 unit maximum currently available for RAD had already been reached" (page 8) 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.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
19	Charles Barlow	7) 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 8) 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.
20	Charles Barlow	8) 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 8). In the Chicago Housing Authority's proposed FY2014 Moving to Work Annual Plan Amendment, the Chicago Housing Authority states "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 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 Office of the Ombudsman. 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 § 964 and allow public housing residents at mixed-income development 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. Moreover, despite encouraging residents to create their own resident organizations at mixed-income development sites (according to the Chicago Housing Authority's responses to public comments on the Amended and Restated Moving to Work Agreement in FY2008), neither the Office of the Ombudsman nor property management have assisted residents in doing so, and in	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 appropriate agreements, policies, and guidance to fully carry this out.



Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
		some cases, residents have been actively discouraged by property management to create resident organizations (e.g. Sullivan Station Apartments). 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.	
21	Charles Barlow	9) The Chicago Housing Authority states “After careful consideration, CHA has determined it will not pursue this type of program” (page 8) in relation to ‘Housing Programs to Support Local Preferences’. Please elaborate upon this consideration and provide justification for the Chicago Housing Authority’s decision to not pursue this type of program. Such programs appear to advance both MTW Statutory Objective I (Increase housing choices for low-income families) and 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).	As stated, CHA considered options for alternative housing programs that would require MTW approval, including a step-down subsidy program. CHA will instead pursue strategies to support HUD and local homelessness initiatives.
22	Charles Barlow	10) The Chicago Housing Authority’s proposed MTW activity (Expedited Public Housing Acquisition Process, page 9) via the Real Estate Acquisition Program appears to be an innovative approach to deliver additional ‘hard’ units, and may be more impactful—since it grants permanent ownership by the Chicago Housing Authority of the housing stock—than the Project-Based Voucher Program. The Chicago Housing Authority states that only 25 units are projected for FY2015 via the Real Estate Acquisition Program. Are there plans to expand this program? Why is this program not being pursued more aggressively since it focuses on the delivery of ‘hard’ instead of ‘soft’ units?	CHA continues to provide and expand a variety of affordable housing options for low income housing families in Chicago. CHA also continues to pursue existing and new strategies to achieve the 25,000 unit goal to fulfill the obligations of the MTW Agreement, including the Real Estate Acquisition Program (REAP). CHA is committed to satisfying the needs of families with a Right of Return and wait list applicants through a variety of unit delivery strategies.
23	Charles Barlow	11) How will the Real Estate Acquisition Program impact the delivery of hard units of replacement housing at the mixed-income developments and traditional properties? For example, the Chicago Housing Authority promised to ultimately deliver 465 units of replacement public housing units at Park Boulevard for the demolished Stateway Gardens development. Will this number—and others—be reduced if units are delivered off-site via the Real Estate Acquisition Program?	CHA continues to provide and expand a variety of affordable housing options for low income housing families in Chicago. CHA also continues to pursue existing and new strategies to achieve the 25,000 unit goal to fulfill the obligations of the MTW Agreement. CHA is committed to satisfying the needs of families with a Right of Return and wait list applicants through a variety of unit delivery strategies.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
24	Charles Barlow	12) The Chicago Housing Authority states “The impact of the revised minimum rent level is an increase in rent collection revenue from residents paying the minimum rent” (page 9). How much additional revenue does the Chicago Housing Authority anticipate to receive in FY2015? How much additional revenue has the Chicago Housing Authority received since the revision of minimum rent in FY2009? How is the additional revenue used?	CHA has provided estimates related to revenue increases for this MTW activity in Section IV, based on the required format for standard metrics.
25	Charles Barlow	13) The Chicago Housing Authority states “In FY2014, CHA will lower 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” (page 10). As the Chicago Housing Authority is already aware, the negative public attention on this issue from major media outlets has resulted in the immediate termination of lease agreements for a limited number Housing Choice Voucher holders receiving exception payments where the landlord has decided that he/she no longer wishes to rent to the tenant. How is the Chicago Housing Authority currently dealing with these situations? How does the Chicago Housing Authority propose to handle similar situations over the next three years?	CHA will continue to evaluate policies and procedures related to exception payment standards. CHA is working with participants and owners affected by this policy change.
26	Charles Barlow	14) The Chicago Housing Authority states “As part of the HCV Owner Excellence Program, CHA may approve tenancy for a unit that passed an inspection within the previous 90 days eligible owners, with qualifying units, participating in the Owner Excellence Program” (page 10). This sentence does not make sense. Please clarify.	Thank you for your comment.
27	Charles Barlow	15) The Chicago Housing Authority states “CHA may increase the percent of assisted PBV units in certain projects above the regulatory limit of 25% per family building” (page 10). What is the advantage of this over the rehabilitation or redevelopment of ‘hard’ housing units in line with the original Plan for Transformation goals?	CHA has MTW authority to exceed the standard limit of no more than 25% project-based voucher units in non-supportive family housing properties. This enables CHA to provide more units for CHA families and applicants within a single property utilizing project-based vouchers. The use of PBVs through the PRA program allows CHA to expand the variety of housing options offered to low-income families in Chicago.
28	Charles Barlow	1) The Chicago Housing Authority states that the agency plans for 128 new public housing units to be added during FY2015. Of these 128 units, only 6 (4.69%) of these units will be 4-bedroom units, and no 5-bedroom, or 6+ bedroom units are planned. Given the demonstrated need for larger units for public housing families, why are a greater number of larger units not planned for FY2015?	The bedroom needs of families with a Right of Return and wait list applicants are evaluated on a case by case basis.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
29	Charles Barlow	2) The Chicago Housing Authority states “A management office and small ground floor commercial space are also included in this phase [at Gwendolyn Place]” (pages 12-13). Given 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)—specifically relating to economic self-sufficiency—will a preference be granted to a resident-owned business for the aforementioned small ground floor commercial space? If not, why not?	CHA does not have a preference for resident-owned businesses at Gwendolyn Place.
30	Charles Barlow	3) The Chicago Housing Authority states “CHA continues to work with stakeholders to finalize the master plan for the Altgeld-Murray community, including residential and community facility components” (page 13). Does ‘community facility components’ include commercial and/or retail space? If so, to what extent? If not, why not? Additionally, will there be a preference for resident-owned businesses to occupy any commercial and/or retail space proposed in the master plan? If not, why not?	The final Master Plan for Altgeld-Murray will include a significant investment to rehabilitate residential units and will provide improved community facilities. CHA continues to strive to bring a variety of community amenities and resources to residents and surrounding neighborhoods at all CHA sites.
31	Charles Barlow	4) Given that the Chicago Housing Authority expresses an intent to demolish offline units at Altgeld Gardens and Phillip Murray Homes, what are the replacement plans for this loss of ‘hard’ housing units?	CHA continues to finalize any demolition of offline units at Altgeld-Murray Homes as part of the overall Master Plan for the site.
32	Charles Barlow	5) The Chicago Housing Authority reports that there are currently 92 offline public housing units at the Henry Horner Superblock and that the agency plans for the “Redevelopment of the Horner Superblock [to] transform the existing public housing property into a mixed income development with 200 total rental units, including 95 for public housing, 50 for affordable and 55 for market rate residents” (page 18). Will this transformation into a mixed-income community result in a net loss of ‘hard’ public housing units at the development? If so, what does the Chicago Housing Authority propose for their replacement? If the existing units were previously counted towards unit delivery goals under the Plan for Transformation and will no longer exist following this transformation, will the units be removed from the unit delivery totals reported to the United States Department of Housing and Urban Development in the Chicago Housing Authority’s next Moving to Work Annual Report? If not, why not?	The redevelopment of the Superblock will provide 95 public housing units in a mixed-income development, which will result in a reduction of existing public housing units in the Superblock. CHA will adjust unit delivery totals to reflect this reduction of units previously counted toward the 25,000 goal.
33	Charles Barlow	6) The Chicago Housing Authority states “[The mixed-use development at Clybourn Avenue and Division Street] also includes approximately 11,200 sq. ft. of residential community space and 17,200 sq. ft. of commercial/retail space” (page 20). Given 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	CHA does not have a preference for resident-owned businesses at Clybourn/Division.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
		become economically self-sufficient)—specifically relating to economic self-sufficiency—will a preference be granted to a resident-owned business for the aforementioned commercial/retail space? If not, why not?	
34	Charles Barlow	7) The Chicago Housing Authority states “In FY2015, CHA will continue working with the City of Chicago to develop a community that includes public housing and other residential, commercial, institutional, and recreational components [at the mixed-income, mixed-use development at the former Harold Ickes site]” (page 20). Given 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)—specifically relating to economic self-sufficiency—will a preference be granted to a resident-owned business for the aforementioned commercial component? If not, why not?	CHA does not have a preference for resident-owned businesses at Harold Ickes.
35	Charles Barlow	8) The Chicago Housing Authority states “CHA plans to sell seven acres of LeClaire Courts city-state land for the Academy for Global Citizenship (AGC) to build an international baccalaureate charter school that emphasizes environmental sustainability and green technology to grade school students, their families and the surrounding community” (pages 20-21). The Academy for Global Citizenship’s webpage states “The Academy for Global Citizenship is an open enrollment, free public school for students living within the City of Chicago. We particularly encourage families in the LeClaire Courts, West Elsdon, and Archer Heights neighborhoods to apply, however, there is no neighborhood boundary or preference given based on residential area” ( <a href="http://agcchicago.org/families/enroll/">http://agcchicago.org/families/enroll/</a> ). Will this be the case for this new initiative given that it is a charter school? If not, why not? Given that the new school will exist on land once occupied by public housing residents, will there be any preference for the children of Chicago Housing Authority residents to enroll in the school? If not, why not?	In accordance with Plan Forward goals, CHA is committed to coordinating public and private investments to develop healthy, vibrant mixed income communities, including the redevelopment of LeClaire.
36	Charles Barlow	9) The Chicago Housing Authority plans for a “\$1.2M [Planned Capital Fund Expenditure] in planned other/administrative expenses” (page 22). Please specify what these expenses include in greater detail.	This category includes principle debt payments from previous bond financing.
37	Charles Barlow	10) The Chicago Housing Authority states “CHA is currently in compliance. This section [Reporting Compliance with MTW Statutory Objectives] does not apply” (page 23). It would be helpful if the Chicago Housing Authority could demonstrate how the agency is in compliance and how the agency proposes to remain in compliance during FY2015.	Per the requirements in Form 50900 (effective May 2013), because the agency is in compliance, CHA is not required to provide additional discussion or reporting in this section.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
38	Charles Barlow	11) The Chicago Housing Authority states the 2010 Senior Designated Housing Plan allows “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” (page 24). How will this impact residents who are 55 years of age or older but are younger than 62 years of age at the time the building is re-designated from a Reduced Age Building to a Traditional Building?	Thank you for your comment. This does not impact existing residents in senior properties. Changing a property's designation will only require new admissions to meet the new age requirement.
39	Charles Barlow	12) The Chicago Housing Authority states in the ‘Wait List Information Projected for the Beginning of FY2015’ table (page 24) that there are no plans to open the wait list for the Federal MTW Project Based Voucher Program during FY2015. However, on page 25, the Chicago Housing Authority states that “In FY2015, the PBV (PRA) Wait List will remain open for the following families...”. Please clarify.	CHA has updated this section and clarified which wait lists will be partially open in FY2015.
40	Charles Barlow	13) The Chicago Housing Authority states “If there are no applicants eligible for a specific program/initiative on the wait list, then applicants may be generated by referral from various community organizations or other government agencies” (page 25). Is it possible for potential applicants to self-refer? If not, why not?	Thank you for your comment. CHA will take your comment under consideration in finalizing the procedures for new programs or initiatives.
41	Charles Barlow	1) The Chicago Housing Authority’s proposed MTW activity via the Real Estate Acquisition Program (page 28) appears to be an innovative approach to deliver additional ‘hard’ units, and may be more impactful—since it grants permanent ownership of the housing stock—than the Project-Based Voucher Program. The Chicago Housing Authority notes that only 25 units are projected for FY2015 via the Real Estate Acquisition Program. Are there plans to expand this program? Why is this program not being pursued more aggressively since it focuses on the delivery of ‘hard’ instead of ‘soft’ units?	CHA continues to provide and expand a variety of affordable housing options for low income housing families in Chicago. CHA also continues to pursue existing and new strategies to achieve the 25,000 unit goal to fulfill the obligations of the MTW Agreement, including the Real Estate Acquisition Program (REAP). CHA is committed to satisfying the needs of families with a Right of Return and wait list applicants through a variety of unit delivery strategies.
42	Charles Barlow	2) How will the Real Estate Acquisition Program (page 28) impact the delivery of units of replacement housing at the mixed-income developments and the traditional properties?	CHA continues to provide and expand a variety of affordable housing options for low income housing families in Chicago. CHA also continues to pursue existing and new strategies to achieve the 25,000 unit goal to fulfill the obligations of the MTW Agreement. CHA is committed to satisfying the needs of families with a Right of Return and wait list applicants through a variety of unit delivery strategies.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
43	Charles Barlow	3) The Chicago Housing Authority states the Real Estate Acquisition Program allows the agency to “acquire units and/or buildings without prior HUD approval, provided that CHA certifies that HUD site selection requirements have been met” (page 28). Are there plans for any oversight from the United States Department of Housing and Urban Development for the Real Estate Acquisition Program? Will there be an opportunity—for example an annual review—for the United States Department of Housing and Urban Development to review and analyze all properties acquired by the Chicago Housing Authority for the Real Estate Acquisition Program each fiscal year? If not, why not?	Units acquired under this activity, if approved, would also be subject to other HUD approvals and would be reported in CHA's Annual Report.
44	Charles Barlow	4) The Chicago Housing Authority does not indicate the bedroom sizes for the units the agency intends to acquire via the Real Estate Acquisition Program. Given that only six new 4-bedroom public housing units are planned for delivery in FY2015 and given that there is a demonstrated need for larger units for public housing families, what proportion of the Real Estate Acquisition Program units will be 4-bedroom units or larger? Ideally, this Program would be focused on bringing a greater number of larger units into the Chicago Housing Authority's portfolio.	Projected bedroom sizes for REAP in FY2015 are indicated in the "Planned New Public Housing in FY2015" table in Section II.
45	Charles Barlow	1) The Chicago Housing Authority states “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” (page 30). In light of this, why can't (or why won't) the Chicago Housing Authority utilize the funds held in its reserves to catalyze development at mixed-income development sites? The Chicago Housing Authority, for example, promised the delivery of 1,000 public housing units at the Oakwood Shores site and 465 public housing units at the Park Boulevard site as part of its Plan for Transformation. Will the Chicago Housing Authority deliver on this promise in light of the quoted statement taken from page 30?	CHA continues to provide and expand a variety of affordable housing options for low income housing families in Chicago. CHA also continues to pursue existing and new strategies to achieve the 25,000 unit goal to fulfill the obligations of the MTW Agreement. CHA is committed to satisfying the needs of families with a Right of Return and wait list applicants through a variety of unit delivery strategies.
46	Charles Barlow	2) The wording used in the Office of the Ombudsman section (page 39) implies that the Ombudsman is a dedicated member of staff. However, this is not the case. How does the Chicago Housing Authority strive to ensure consistency if residents are not able to speak with a single dedicated staff member (or multiple dedicated staff members) about any issues they encounter while residing at a mixed-income development site?	CHA does, in fact, have 2 dedicated staff members that make up the Office of the Ombudsman as well as a dedicated phone line and email address.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
47	Charles Barlow	3) When the Office of the Ombudsman was created by the Chicago Housing Authority, the Chicago Housing Authority abolished the Local Advisory Councils at the mixed-income developments via an Amended and Restated Moving to Work Agreement. During the public comment process pertaining to this document, the Chicago Housing Authority stated "Families in public housing units may elect to form associations or organizations of their choosing ... Some examples of the community organizations are block clubs, neighborhood watch organizations, and CAPS". However, now that resident organizations are being created at mixed-income development sites (e.g. Sullivan Station Apartments and Lake Park Crescent), residents are not getting the necessary support from the Office of the Ombudsman or property management to ensure the success of the organizations that the Chicago Housing Authority claims to encourage. How will the Chicago Housing Authority's Office of the Ombudsman deal with such issues in FY2015?	Please Contact the Office of the Ombudsman at 312.913.7899 to discuss your specific concern.
48	Charles Barlow	4) The FY2015 benchmark for the Office of the Ombudsman is a "minimum of six meetings for mixed-income residents in FY2015" (page 39). Historically, the Chicago Housing Authority has not exceeded this minimum standard. The Chicago Housing Authority would engage a greater number of residents if meetings were held at each individual mixed-income development – is this possible going forward?	CHA has no intention of increasing the standard it proposed for regional meetings. Historically, the Office of the Ombudsman has held individual group meetings at various mixed-income properties and plans to do so in the future.
49	Charles Barlow	5) The Chicago Housing Authority states that "the time to conduct a re-examination increased from 3.5 hours to 6.5 hours" (page 41). This is a substantial increase. What is the basis for this?	CHA conducted a comprehensive time and cost analysis for re-examinations in FY2014 and made updates to metrics as applicable. The new analysis was more robust than previous estimates and included itemized costs (direct and indirect) of a random sample population and tracked time and costs associated with re-examinations.
50	Charles Barlow	1) The Chicago Housing Authority lists \$17,010,177 as "Other Income" (page 60). What are the sources of this other income?	Based on the applicable required FDS line items, this includes non-MTW funding as it relates to non-federal grants, energy tax credit sale, potential land sales, rooftop cellular rentals and all other funding streams.
51	Robert Jones	I am a resident at Patrick F. Sullivan Apt, and we have a problem with the elevators, and we only have one working elevator working in the building. Also, I have informed maintenance about a fire alarm sound that's going off the laundry room 4th floor.	Thank you for your comment. CHA is already in communication to address this matter.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
52	Robert Jones	I am a resident at Patrick Sullivan Apts, and I would like to talk to someone about a security problem. We have non-working lights about fixing the lights around the building. I have e-mailed maintenance about the lights, and no action has been taken, and I have also informed the manager & the assistant manager about the problem. The lights have been out since May 2014.	Thank you for your comment. CHA is already in communication to address this matter.
53	Robert Whitfield	<p>The draft CHA Plan proposes to deliver 1,109 housing units in 2015. However, only 36 of the units are identified as being located on the north or north west side of the City in a neighborhood that does not have a significant minority population. This appears to continue a pattern of CHA not developing and or rehabilitating low income housing on the north or north west areas of the City.</p> <p>Further, the proposed CHA housing for the Cabrini area (36 units), is far less low income housing than the number of public housing that existed prior to the start of the CHA MTW Plan. Also, the total number of low income replacement housing that will be built on or near the Cabrini site ( or in other north or north west side areas) will be significantly less than the 3,000 public housing units that existed there prior to the beginning of the CHA MTW Plan.</p> <p>The draft CHA Plan had language stating the CHA intent to continue its Lathrop Homes redevelopment plan for 400 public housing units to be returned on the Lathrop Homed site. There is no mention of any Lathrop Homes replacement public housing units being around or near the site, or being located in any north or north west side of the City; nor have there been any discussions in the Lathrop Working Group about placing Lathrop replacement housing.</p> <p>Given that thousands of low income housing will be list in integrated areas on the north side , and there are no CHA plans to address this problem , this raises an issue whether the draft CHA Plan complies with the Fair Housing Act. HUD 's Office of Fair Housing should review the draft to determine compliance with all FHEO Requirements and regulations prior to HUD approval of the CHA draft Plan.</p>	Thank you for your comment.
54	Jasmine Gaiter	Hi my name is Jasmine my voucher number is N022681. I was wondering what is taking Cha so long with approving my RTA and giving me an inspection date if I turned it in September 12 2014 and the estimated waiting time is 5days. What is going on? im homeless my children and I have no place to live and my deadline is approaching. Is there someone that can help.	Thank you for your comment. CHA is already in communication to address this matter.



Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
55	Business and Professional People for the Public Interest	New Housing: To meet its obligations under Gautreaux court orders CHA should be focusing its resources on two primary goals: (1) increasing the number of public housing units in Gautreaux General Areas and Opportunity Areas; and (2) completing mixed income developments (including their Gautreaux "remedial units") under the Plan for Transformation. To the extent that the proposed expedited acquisition process (page 28) may increase CHA's ability to develop such units, BPI supports this activity. CHA's proposal to deliver project-based vouchers through "preservation strategies" (page 7) and a "sponsor-based housing program" (pages 8, 16) might play a helpful role in reaching these goals, but comment on them is difficult because of the paucity of information supplied. It is suggested that the Plan provide more detail on these programs.	CHA is committed to meeting its obligations under Gautreaux court orders by increasing the number of public housing units in General and Opportunity areas and through the development of mixed income communities. Project-based vouchers provide CHA with the opportunity to preserve affordable units that otherwise might be at risk in the market place. CHA supports local preservation strategies to ensure long-term affordability of existing affordable housing in Chicago through the use of project-based vouchers. In FY2015, CHA will provide PBV assistance at Kenmore Plaza Apartments through the preservation strategy as indicated in Section II. CHA has added more information on the Sponsor-Based Housing Program in Section II.
56	Business and Professional People for the Public Interest	Altgeld Gardens Redevelopment: The draft Annual Plan states (pages 13, 18), that CHA intends to rehabilitate approximately 218 units in Altgeld Gardens (a Limited Area) in the coming year, but it does not mention sorely needed community improvements. Altgeld Gardens is already home to many hundreds of families; CHA should prioritize the use of its resources to improve community facilities for the benefit of families already living there. Rather than adding more housing -- and more families -- to what is already CHA's largest traditional development, CHA should implement the community facility proposals in its Altgeld redevelopment plan, including improving the physical condition of the child care centers, community center, library, and playgrounds.	The final Master Plan for Altgeld-Murray will include a significant investment to rehabilitate residential units and will provide improved community facilities. CHA continues to strive to bring a variety of community amenities and resources to residents and surrounding neighborhoods at all CHA sites.
57	Business and Professional People for the Public Interest	Exception Payment Standards: The draft Annual Plan describes (pages 41-42) CHA's new policy of lowering the ceiling for exception payments to 150% of FMR. BPI believes that because of high rents in opportunity neighborhoods exception payment standards are a vitally important means of enabling more voucher families to move to such neighborhoods. BPI is concerned, however, that an inflexible ceiling, applicable without exception under all circumstances, may hamper voucher families' access to desirable units. We look forward to CHA's evaluation of how the new ceiling works in practice.	Thank you for your comment. CHA will continue to evaluate exception payment standards.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
58	Business and Professional People for the Public Interest	CHA Reserves: The draft Plan states (page 60): "CHA anticipates utilizing reserves for capital expenditures." However, the draft Plan does not make clear the total amount of available reserves, the portion that will be used for capital expenditures, or the purposes to which that portion is allocated. Without this information, it is difficult to assess whether CHA is using its resources in the most effective way, or in the manner required by CHA's legal obligations.	The information in the annual plan is based on specific HUD MTW reporting requirements. CHA has committed to quarterly reporting on a range of topics, including financial information, and the first report will be released by the end of 2014.
59	Business and Professional People for the Public Interest	Mobility Counseling: Data show that too many families are using CHA vouchers to move into high poverty, racially segregated areas. A substantial increase in the kind and amount of counseling provided, along with modification of voucher procedures, is required to deal effectively with this harsh reality. An appropriate portion of CHA's resources could and should be used for this purpose. The draft Plan is vague with respect to the amount of CHA expenditures on mobility and plans, if any, to revise voucher procedures. It is suggested that the final Plan should include an expanded and more effective mobility program along with more detailed information on how it will be funded.	While the percentage of those moving into Opportunity Areas represents about 11% of all CHA voucher holders, 52% of households who move into Opportunity Areas do so without the assistance of Mobility Counseling. Thus, allocating additional resources to this program does not match the need.
60	Latino Policy Forum	The Latino community makes up nearly a third of the City of Chicago population and comprises about 23 and 22 percent of the income eligible population for both Public Housing and the Housing Choice Voucher programs respectively. Yet, the Latino population participates at less than half the rate it could be- hovering at less than ten percent for Public Housing and about eight percent for Housing Choice Vouchers. 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 percent of their Household income towards rent.	CHA provides housing opportunities to eligible families through waitlists. In recent years and moving forward, CHA has set forth an aggressive outreach strategy, working collaboratively with community partners, to inform many diverse populations, including Latinos, about the opening of waitlists and accessing opportunities for affordable housing.
61	Latino Policy Forum	Based on the proposed 2015 annual plan, the CHA intends to use seven acres of now-vacant land at the LeClaire Courts public housing site for the construction of a new charter school. The location of LeClaire Courts, in Garfield Ridge, on the city's southwest side, is a great opportunity for housing Latinos and for neighborhood integration. If the CHA goes through with its plan to use this land for a charter school rather than public housing, it will squander the opportunity to provide more affordable housing units to the communities that need them most. Therefore, we encourage the CHA to reconsider this plan and use this land for the construction of new public housing units.	In accordance with Plan Forward goals, CHA is committed to coordinating public and private investments to develop healthy, vibrant mixed income communities, including the redevelopment of LeClaire.
62	Latino Policy Forum	Additionally, the CHA's proposed plan calls for the sale of land at 2620 W Potomac in Humboldt Park where a scattered site building was demolished after being left vacant for years. This is problematic because the city's west side is in dire need of affordable housing units and cannot afford to have existing units demolished and property sold. The CHA should rebuild at this property instead of selling it.	Thank you for your comment.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
63	Latino Policy Forum	What's more, the CHA states in its proposed 2015 annual plan that, "in FY2014, the master plan for Lathrop Homes was finalized," although no final plan has been presented to the community and many questions regarding the plans for Lathrop still remain unanswered. Furthermore, the master plan for Lathrop Homes has not been approved by the CHA board. We would like to see more transparency around the plan for Lathrop Homes. The plan should address the affordable housing needs of the surrounding communities.	The Lathrop Homes Working Group and community stakeholders are an integral component of the planning process, which is ongoing. CHA continues to work with stakeholders as it works to pursue zoning approvals, financing and implementation of Phase I in FY2015. CHA has provided further clarification in the annual plan.
64	Latino Policy Forum	The CHA is required by federal law to affirmatively further fair housing. And, the demolition- or lack of new construction of - public housing units in Chicago will absolutely have a disparate impact on the city's ability to provide affordable housing to populations that have historically been underserved. We strongly urge the CHA to provide one-for-one replacement of public housing units in opportunity areas such as Lathrop Homes, Cabrini Row Houses, and LeClaire Courts, 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.	In accordance with Plan Forward goals, CHA is committed to coordinating public and private investments to develop healthy, vibrant mixed income communities. CHA is committed to satisfying the needs of families with a Right of Return and wait list applicants through a variety of unit delivery strategies.
65	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. CHA's ability to create strong, vibrant communities is compromised when opportunities to build affordable housing are squandered and when there is no transparency in decision-making, such as stating that the master plan for Lathrop Homes has been finalized when the myriad of interest groups who have been monitoring this issue are unaware of this. Furthermore, Latino access continues to be woefully underrepresented. We urge the CHA to be transparent in its decision making and to provide access to quality, affordable housing for eligible Chicagoans.	Thank you for your comment.
66	Alderman Moreno	The CHA's Julia C. Lathrop Homes are primarily located in Chicago's First Ward, which I represent in the City Council. I am writing to express two major concerns about the CHA's Draft Annual Plan for FY2015. The first is specifically about the Lathrop Homes, while the second is system-wide. First, a paragraph on Page 18 of the Draft Plan says that the Master Plan for the Lathrop Homes "was finalized in Fiscal Year 2014." It also says that "the preliminary Phase 1 unit mix consists of 497 rental units, including 180 CHA, 111 affordable and 206 market-rate." I find this paragraph troubling on two levels. In terms of process, it should be noted that no final Master Plan has been presented to my community (as a Draft Master Plan was in July 2013), nor has a plan been approved by the CHA Board of Commissioners.	The Lathrop Homes Working Group and community stakeholders are an integral component of the planning process, which is ongoing. CHA continues to work with stakeholders as it works to pursue zoning approvals, financing and implementation of Phase I in FY2015. CHA has provided further clarification in the annual plan.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
67	Alderman Moreno	<p>In terms of substance, I urge the CHA to correct several fundamental flaws in the Draft.</p> <p>Lathrop Master Plan:</p> <ul style="list-style-type: none"> <li>• 45 percent market-rate housing is far too high a percentage in a part of Chicago that has seen plentiful market-rate development but where affordable housing for low- and moderate-income families is scarce.</li> <li>• The CHA must include in the Master Plan a commitment to replace all 925 public housing units currently at Lathrop, so that public housing units not replaced onsite are replaced in the surrounding communities. To date, the CHA has made no written commitment to replace the 525 units not included in the Draft Master Plan. These units are an important federal resource for our city and should be a top priority.</li> <li>• In recent meetings, the Lathrop development team has discussed including a 13-story building in the Lathrop plan. This would be out of scale with the Lathrop campus and the surrounding community. I am also concerned that, in a previous iteration of this concept as a 17-story building, the development team planned to make that building 80 percent market rate. This is vastly different from the CHA's previous commitment that all buildings and building types would be economically mixed. I would oppose any such plan.</li> </ul> <p>Moreover, the CHA continues to stall an effort by current Lathrop residents to secure a Memorandum of Agreement outlining their ability to remain in the development, and enjoy a decent quality of life, during the revitalization process. I find this unacceptable.</p>	CHA anticipates that the redevelopment of Lathrop will satisfy the Right of Return for Lathrop residents. The unit mix is preliminary and has not yet been finalized. CHA continues to work with stakeholders to move forward with redevelopment plans. As such, the Memorandum of Agreement with residents will follow as redevelopment plans are finalized.
68	Alderman Moreno	<p>On a system-wide level, the Draft Plan includes a new budgeting system that is radically different from past financial plans &amp; reports, making it impossible to compare planned expenses in FY2015 to expenses in prior years.</p> <p>Specifically, the Plan:</p> <ul style="list-style-type: none"> <li>• removes key information about planned capital spending</li> <li>• merges voucher program revenue and expenses with public housing program revenue and expenses in ways that prevent future tracking of CHA's utilization of voucher revenue, and</li> <li>• fails to acknowledge the substantial cash surplus the Agency has on hand.</li> <li>• While the CHA's presentation of financial data in this Plan is a radical departure from past budgeting and reporting methods, the document indicates the agency intends to continue its practice of leaving over \$100 million in federal revenue unspent per year.</li> </ul> <p>I am dismayed by both the lack of clarity in the Plan and the continued squandering of federal dollars that could be housing families in our City.</p>	The information in the annual plan is based on specific HUD MTW reporting requirements. CHA has committed to quarterly reporting on a range of topics, including financial information, and the first report will be released by the end of 2014.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
69	Legal Assistance Foundation	<p>As counsel for the LAC as Plaintiff in Cabrini-Green LAC v. CHA, No. 96 C 6949, we have grave concerns about CHA's proposed plan for the Near North High School site. Not only does CHA's plan violate the Consent Decree entered in the above referenced case, CHA's plans also waste valuable land designated for multi-family housing in an increasingly dense area. Under the Consent Decree, CHA has to replace 700 units of public housing as replacement units for families displaced from Cabrini Extension North (and other families with a priority right of return to this area). The Consent Decree provides that: [t]he City will acquire additional land and/or impose appropriate restrictions and requirements on land owned by other persons or entities to make it possible to maintain the commitment by it and by CHA to construct at least 700 public housing units and 270 affordable rental units within the HOPE VI Planning Area .... Land acquired, in the process of being acquired, or otherwise anticipated to be subject to appropriate restrictions and requirements for mixed-income development to date is described in Appendices B and C to the consent decree. Appendices B and C identify the Near North High School site as a "future development site." Further, the Near North High School site was designated, pursuant to the Consent Decree, as a location for more than 16% of those units-115 units. In the FY2015 Annual Plan, at page 17, CHA says: "In November 2013, CHA's Board approved a land swap with the City of Chicago, through which CHA is expected to acquire, subject to HUD approval, the former site of the Near North High School and adjacent field. As part of the previously planned CHA redevelopment activity in the Near North area, CHA intends to dispose of a portion of this land, in fee simple, subject to HUD approval, to the Chicago Park District for the development of a public park. The remaining portions of this land, subject to HUD approval, CHA intends to dispose of... for mixed income housing, retail development and/or other land uses." Because of the Consent Decree, CHA cannot dispose of any of the Near North High School site to the Chicago Park District, and HUD cannot approve this activity in violation of the Consent Decree. Nor would the LAC agree to modify the Consent Decree to allow for dispossession of any of the Near North High School site to the Chicago Park District. Throughout the development of replacement housing under the Consent Decree, the LAC has continuously expressed concern that the CHA is not developing enough three- and four-bedroom units for families with a Right of Return. At each phase, the number of three- and four-bedrooms built has been fewer than were originally planned. This means that there will need to be a large number of three- and four-bedroom units at the Near North High School site- even more than 40%. Family units like this require lower-density because of limitations on public housing families with children residing in high-rise buildings. The LAC certainly supports green space on</p>	<p>The Consent Decree obligates the CHA to redevelop 700 units of public housing as replacement units for families displaced from Cabrini-Green. Through the development of the Cabrini-Green Development Zone Plan (DZP), which identifies land uses and density for 65 acres of vacant land at Cabrini, CHA, with its consultant, Urban Works, has calculated that the 700 units required by the Consent Decree can be developed on the three remaining Consent Decree sites without requiring the development of housing on the Near North High School field. Additional public open space was identified as a high priority from residents and community stakeholders during the DZP planning process. The redevelopment of the Cabrini-Green area is a vital component of CHA's Plan Forward in which CHA aims to build strong, vibrant communities that offer a comprehensive array of services and amenities to its residents. The development of additional public open space for families to recreate and children to play is part of this strategy.</p>

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
		the site, but it must be interspersed among the units to maintain lower density, not cut from the top third of the site. The full acreage of the site should be dedicated to replacement housing. Accordingly, CHA should remove this planned disposition from its MTW Annual Plan.	
70	Robert Whitfield	The draft CHA FY 2015 MTW Annual Plan contains more promises for redevelopment activity at Ickes Homes and LeClaire. However, CHA has repeatedly promised redevelopment activity at these sites in numerous draft CHA MTW Annual Plans, without any movement at either site. It is therefore unlikely that any CHA redevelopment activity will occur at either site, notwithstanding the promises in the draft CHA FY 2015 MTW Annual Plan. The 2010 CHA MTW Annual Plan contained language indicating that redevelopment activity would begin in 2010 at Ickes Homes and LeClaire. That did not occur. CHA drafted RFPs in 2011 to solicit developers for Ickes and LeClaire. The draft RFPs were distributed to the Working Groups for these sites in 2011, but subsequently cancelled by CHA without explanation. The CHA FY 2013 MTW Annual Plan stated that solicitation for developers for both these sites would occur in 2013. That did not occur. Residents who lived at these sites have repeatedly been delayed in obtaining replacement public housing due to continuing promises by CHA, without follow up. HUD should require CHA to report quarterly progress on the developer solicitation for each of these sites (Ickes and LeClaire) and condition approval of the draft CHA FY 2015 MTW Annual Plan on CHA meeting each quarterly benchmark established by HUD so progress and redevelopment can finally begin at these sites as repeatedly promised by CHA for more than ten years.	As updated in the annual plan, CHA worked with the City of Chicago to release a solicitation for development proposal for the former Ickes site in October 2014. CHA continues to plan for the redevelopment of LeClaire.
71	Leah Levinger/Chicago Housing Initiative	Need to improve Financial Transparency: The Chicago Housing Initiative would like to see CHA provide a more transparent presentation of its projected 2015 revenue and expenses. We were dismayed to see that CHA has radically restructured the financial section of its 2015 Plan in ways that make CHA's spending decisions and current financial position even less transparent than ever before. For CHA to remove key financial data from its 2015 Plan shortly after expose's and serious questioning by both the Chicago Tribune and the Chicago Sun-Times of CHA's decision to	The information in the annual plan is based on specific HUD MTW reporting requirements. CHA has committed to quarterly reporting on a range of topics, including financial information, and the first report will be released by the end of 2014.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
		stockpile excessive reserves at the expense of providing housing for thousands is striking.	
72	Leah Levinger/Chicago Housing Initiative	<p>We have the following concerns about CHA's new format for presenting its financials:</p> <p>(a) CHA's decision to commingle the public and voucher program budgets makes it impossible to track CHA's planned utilization of voucher revenue. Since CHA has a long-standing issue with under-utilization of its voucher revenue, leaving over \$100 million in voucher funds unspent each year between 2008 and 2012, CHA's decision to commingle program budgets in ways that make future tracking impossible is very upsetting.</p> <p>(b) CHA has removed all information about its planned capital spending. Since capital spending constitutes some of the largest expenditures CHA makes, removal of this information from CHA's planned budget makes the Agency's overall plans for unit delivery, rehabilitation and revitalization much less clear.</p> <p>(c) CHA makes no mention of its growing cash surplus— In fact, CHA fails to indicate it has any significant level of unrestricted cash on hand, when according to its latest published financial report (FY2012), CHA had over \$432 million in unrestricted excess cash. CHA needs to be much more transparency about the level of unrestricted, liquid resources it has on hand to meet Chicagoans housing needs. As one step, we urge CHA to produce and publish a plan showing how it intends to put this unrestricted cash to use towards providing housing.</p>	The information in the annual plan is based on specific HUD MTW reporting requirements for MTW sources and uses in Section V and planned capital expenditures in Section II. CHA has committed to quarterly reporting on a range of topics, including financial information, and the first report will be released by the end of 2014.
73	Leah Levinger/Chicago Housing Initiative	In addition, CHA needs to justify its decision to leave another \$112 million unspent in 2015: The CHA's 2015 budget indicates that it will leave an additional \$112 million unspent in 2015. Why, in 2015, is CHA continuing its practice of leaving around \$100 million in federal revenue unspent annually, with no explanation. This practice is so long-standing that it appears the CHA has made choice to continue to stockpile cash at the expense of serving families who need housing. Please explain how CHA's decision to accumulate even greater unrestricted cash is in the public's best interest or advances the CHA's mission.	The information in the annual plan is based on specific HUD MTW reporting requirements. CHA has committed to quarterly reporting on a range of topics, including financial information, and the first report will be released by the end of 2014.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
74	Leah Levinger/Chicago Housing Initiative	CHA needs to justify its treatment of “depreciation” in its finances: The CHA has included a \$153 million line item for “depreciation” in its budget— CHA’s continued treatment of depreciation— a non-cash outlay— as an expense (as if it is paying this \$153 million to a third party) artificially inflates the appearance of CHA’s planned expenses (making it look like CHA will spend more money on its programs than the Agency will in fact spend). The CHA needs to explain the function of “depreciation” in its budgets. CHA’s current treatment of depreciation has the affect of hiding liquid cash and making CHA appear to be spending much more than it is spending. Chicago’s citizens and elected representatives deserve a clear and transparent presentation of the Agency’s financial standing and actual spending. The changes CHA has made to its financial documents actually make CHA’s financials less clear and less transparent than they have ever been. We urge a supplementary budget— consistent with past format for CHA’s estimated revenue and planned expenses— be included in the CHA’s 2015 plan and that very clear information is provided about unrestricted cash on hand.	The information in the annual plan is based on specific HUD MTW reporting requirements. Depreciation is included as a required FDS line item. CHA has committed to quarterly reporting on a range of topics, including financial information, and the first report will be released by the end of 2014.
75	Leah Levinger/Chicago Housing Initiative	<p>We commend CHA's decision to circulate 41,845 vouchers in FY2015, of the roughly 50,000 vouchers HUD provides funding for CHA to circulate. In comparison, CHA had only 36,679 vouchers in circulation at the start of this year (2014).</p> <p>CHA's decision to circulate 5,166 more vouchers by the end of 2015 will raise CHA's voucher utilization rate to around 84% from the current 75% utilization rate.</p> <p>We applaud the CHA's choice to release more vouchers.</p> <p>This is the right decision by CHA and we urge CHA to continue progress towards full utilization of the voucher funding— Our recommendation remains for CHA to reach 97% utilization of available voucher funding for voucher subsidies, services, and administration costs by 2018.</p> <p>As part of this greater use of available voucher revenue, we urge the CHA to increase the resources it devotes to mobility counseling programs as part of the voucher program budget, to ensure voucher recipients are able to access all neighborhoods in Chicago.</p>	Thank you for your comment.
76	Jeremy Bergstrom/Argent Shriver National Center on Poverty Law	Section I p. 7 – CHA Unit Delivery Strategy Homeownership units should not count as Plan for Transformation units since subsidized housing is intended to support those who are unable to own their own homes.	Thank you for your comment.



Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
77	Jeremy Bergstrom/Argent Shriver National Center on Poverty Law	Section I p. 7 – Projected Fiscal Year 2015 Delivery CHA should additionally place units online at Cabrini, Lathrop and scattered site properties.	Thank you for your comment.
78	Jeremy Bergstrom/Argent Shriver National Center on Poverty Law	Section I p. 8 – Rental Assistance Demonstration (RAD) Program CHA should adopt 24 CFR §964 (tenant participation) and 24 CFR §966 (tenant grievance procedures) at all RAD-converted developments. Additionally, CHA should adopt policies that lead to one-for-one replacement of standing units under RAD, as opposed to just occupied units, and that require an ownership structure that maintains a high degree of public control over RAD developments that utilize Low Income Housing Tax Credits.	Thank you for your comment. CHA will continue to recognize and fund existing resident organizations as they exist currently. Regarding grievances under RAD, CHA will issue a revised grievance procedure for public comment and Board approval that retains many of the current public housing grievance processes for residents of future RAD properties. One-for-one replacement is not necessary as CHA intends to use RAD for 100% of the public housing units included in the pending application. Under RAD, CHA must maintain ownership and/or control of designated RAD units, except mixed-income units whereby CHA maintains an interest in accord with RAD regulations.
79	Jeremy Bergstrom/Argent Shriver National Center on Poverty Law	Section I p. 9 – Public Housing and HCV Programs/Uniform Housing Policy CHA should lower the minimum rent, which is unnecessarily punitive of very-low income families, especially in light of CHA's financial health, capital and reserves.	Thank you for your comment.
80	Jeremy Bergstrom/Argent Shriver National Center on Poverty Law	Section I pp. 9-10 – Public Housing CHA should remove the Public Housing work requirement. It is punitive to tie housing to employment for low-income families, particularly in an economy still recovering from the Great Recession.	Thank you for your comment. Based on data, 97% of households are compliant with the work requirement, including those in Safe Harbor, or are exempt. As a point of clarification, the work requirement includes working 20 hours per week or attending school or work training. CHA has invested considerable resources in the latter two for residents.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
81	Jeremy Bergstrom/Argent Shriver National Center on Poverty Law	Section I p. 10 – Housing Choice Voucher Program – Exception Payment Standard CHA's lowering of the payment standard to 150% of HUD FMR must be coupled with: (1) fast turnaround reasonable accommodation requests granted for rents above 150% of the FMR; (2) higher exception rents in "high opportunity" neighborhoods where 150% of the FMR will not compete with market rents in those areas. The CHA could propose to pay up to 200% of the FMR in certain high opportunity neighborhoods to assist families live in neighborhoods with high quality schools, for example; and (3) increased commitment to housing mobility counseling, holding payments for units in high opportunity neighborhoods, rapid inspection programs for high opportunity units, and other program improvements to increase participation by landlords with units in high opportunity neighborhoods.	Thank you for your comment. CHA will continue to evaluate exception payment standards.
82	Jeremy Bergstrom/Argent Shriver National Center on Poverty Law	Section I p. 10 – Housing Choice Voucher Program – Vacancy Payments CHA should implement its policies regarding vacancy payments in a way that does not encourage or reward evictions or vacancies.	Thank you for your comment. CHA will take your concern under consideration when enhancing current Owner Excellence Program policies.
83	Jeremy Bergstrom/Argent Shriver National Center on Poverty Law	Section I p. 10 – Property Rental Assistance/Project-Based Voucher Program CHA should permit residents to request a Housing Choice Voucher after one year of assistance, consistent with 24 CFR §983.261. Waiting lists for affordable housing in Chicago do not justify preventing turnover of a project-based Section 8 unit at the expense of denying a family's mobility, a fundamental benefit of the voucher program.	Thank you for your comment.
84	Jeremy Bergstrom/Argent Shriver National Center on Poverty Law	Section I p. 10 – Approved MTW Activities We believe CHA's policy of utilizing a single fund budget has had a negative impact of MTW on residents and communities and has failed to meet a goal of the Moving To Work Demonstration to increase housing choices for low-income residents and to serve the most families in need.	Thank you for your comment.
85	Jeremy Bergstrom/Argent Shriver National Center on Poverty Law	Section II-A pp. 10-13 – Housing Stock Information CHA should promptly rehabilitate and lease up every unit of public housing in its stock.	Thank you for your comment.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
86	Jeremy Bergstrom/Argent Shriver National Center on Poverty Law	Section II p. 14 – New Housing Choice Vouchers to be Project-Based in FY2015 Lake Village East and Kenmore Plaza are properties where tenants are statutorily entitled to enhanced Housing Choice Vouchers as the result of preservation prepayments of their Section 236 mortgages. While we commend CHA for approving the issuance of HAP contracts for Project-Based units for residents who choose to relinquish their enhanced vouchers in favor of a Project-Based assisted unit, it is not fair to characterize those Project-Based units as “new” since they are replacing a former HUD subsidy program to allow the unit to remain affordable. In other words they do not add to the affordable housing stock in Chicago; rather, they prevent the loss of the affordable unit. Moreover, it is important to recognize that the numbers cited as anticipated by CHA may not represent the final number of HAP contracts placed at those buildings, where tenant choice is currently ongoing. Nor should these be counted towards the 25,000 unit commitment as part of the Plan For Transformation.	These units will be new to CHA's Property Rental Assistance portfolio and represent new housing opportunities for applicants on CHA's wait lists as units turnover. The project-based voucher units are long-term affordable housing opportunities that would have been lost without a project-based contract. The numbers provided are estimates and actual numbers, once finalized, will be reported.
87	Jeremy Bergstrom/Argent Shriver National Center on Poverty Law	Section II p. 17 – Long Term Plan for Offline Units Status CHA should indeed make all offline units available for leasing as soon as possible. CHA should include scattered sites in its reporting to HUD.	Thank you for your comment.
88	Jeremy Bergstrom/Argent Shriver National Center on Poverty Law	Section II pp. 17-18 – Units pending redevelopment/planning CHA should make the offline units at these developments available for lease as soon as possible. CHA redevelopment plans and activity should not lead to a reduction in available units, especially given the need for subsidized affordable housing in Chicago and CHA's available reserves. In particular, CHA's redevelopment plans should absolutely not provide for the development of market rate units at the expense of a loss of public housing units.	Thank you for your comment.
89	Jeremy Bergstrom/Argent Shriver National Center on Poverty Law	Section II pp. 18-19 – Units undergoing capital maintenance CHA should report scattered sites with specificity, as they represent a substantial number of units.	Thank you for your comment.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
90	Jeremy Bergstrom/Sargent Shriver National Center on Poverty Law	Section II-B p. 23 – Description of Anticipated Issues Related to Leasing in FY2015 Meeting all of CHA's screening criteria should not serve as a barrier to housing. CHA should adapt its screening criteria to ensure it is not unjustly excluding applicants from housing. We commend CHA for agreeing to implement the CCH-CHA Reentry Pilot Program and encourage CHA to expand its implementation and further adapt CHA's screening criteria in a way that provides fair housing opportunities to those in the community most vulnerable to poverty and homelessness, such as ex-offenders. The CHA, per the Landers v. CHA decision, should never use arrests as a basis to deny admission or terminate assistance.	Thank you for your comment. CHA will continue to use its screening policies for applicants. The Landers case did not prohibit the use of arrests in determining suitability of an applicant. In particular, the court agreed with CHA "that evidence of conviction is not a prerequisite for denying an application for public housing." The court further stated it did not dispute CHA's ability to reject an applicant based on a criminal record that includes convictions and arrests.
91	Jeremy Bergstrom/Sargent Shriver National Center on Poverty Law	Section II-C p. 23 – Family Housing (Community-Wide) Wait List We hope CHA will open its family wait list as soon as possible and administer the list in a way that keeps families needing housing on the list as opposed to purging them off with little or no notice. We encourage CHA to do all it can to house families in need of housing as soon as possible, including leasing vacant and offline units.	Thank you for your comment. CHA's Family Public Housing wait list will be open between October 27, 2014 and November 24, 2014.
92	Jeremy Bergstrom/Sargent Shriver National Center on Poverty Law	Section II-C p. 24 – HCV Wait List We encourage CHA to open its wait list as per its commitment, and to administer the list in a way that keeps families needing housing on the list as opposed to purging them off with little or no notice. We encourage CHA to utilize its voucher funding to its maximum potential.	Thank you for your comment.
93	Jeremy Bergstrom/Sargent Shriver National Center on Poverty Law	Section III-C p. 25 – Changes to CHA Wait Lists in FY2015 CHA should not penalize unemployed families by giving stably employed families a super priority for the HCVP. While we do not dissuade efforts to encourage and promote employment, allowing unemployment to serve as a barrier to subsidized housing is not an appropriate method, since stable housing may likely increase the chance for an individual to gain employment.	Thank you for your comment.
94	Jeremy Bergstrom/Sargent Shriver National Center on Poverty Law	Section IV p. 32 – \$75 Minimum Rent for Public Housing and HCV CHA should lower the minimum rent, which is unnecessarily punitive of very-low income families, especially in light of CHA's financial health, capital and reserves. The CHA has also failed to abide by the hardship exemption and should modify its policies and practices to come into compliance in that regard.	Thank you for your comment. The established minimum rent will remain in effect. CHA has established hardship suspension and exemption standards for residents or participants unable to meet the minimum rent standards, which is in compliance with the federal regulations. See Section X(E)(8) of the 2015 ACOP and Section 6-III(B) of the 2015 HCV Administrative Plan for more information.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
95	Jeremy Bergstrom/Argent Shriver National Center on Poverty Law	Section IV pp. 36-37 – Public Housing Work Requirement CHA should remove the Public Housing work requirement. It is punitive to tie subsidized housing to employment for low-income families, particularly in an economy still recovering from the Great Recession.	Thank you for your comment. Based on data, 97% of households are compliant with the work requirement, including those in Safe Harbor, or are exempt. As a point of clarification, the work requirement includes working 20 hours per week or attending school or work training. CHA has invested considerable resources in the latter two for residents.
96	Jeremy Bergstrom/Argent Shriver National Center on Poverty Law	Section IV pp. 41-42 – Exception Payment Standards CHA's lowering of the payment standard to 150% of HUD FMR must be coupled with: (1) fast turnaround reasonable accommodation requests granted for rents above 150% of the FMR; (2) higher exception rents in "high opportunity" neighborhoods where 150% of the FMR will not compete with market rents in those areas. The CHA could propose to go up to 200% of the FMR in certain high opportunity neighborhoods to assist families live in neighborhoods with high quality schools, for example; and (3) increased commitment to housing mobility counseling, holding payments for units in high opportunity neighborhoods, rapid inspection programs for high opportunity units, and other program improvements to increase participation by landlords with units in high opportunity neighborhoods.	Thank you for your comment. CHA will continue to evaluate policies and procedures related to exception payment standards.
97	Jeremy Bergstrom/Argent Shriver National Center on Poverty Law	Section IV pp. 48-49 – Two-Year Requirement for PBV Participant Transition to HCV CHA should permit residents to request a Housing Choice Voucher after one year of assistance, consistent with 24 CFR § 983.261. Waiting lists for affordable housing in Chicago do not justify preventing turnover of a Project-Based Section 8 unit at the expense of denying a family's mobility, a fundamental benefit of the voucher program.	Thank you for your comment.
98	Jeremy Bergstrom/Argent Shriver National Center on Poverty Law	Section IV pp. 50-52 – Biennial Re-examinations for Public Housing We support CHA's decision to move to biennial re-examinations for public housing. However, the CHA must repeatedly report (beyond the planning documents – actual notice to the residents) this proposed change to residents and inform them of their obligations under the new re-examination program.	Thank you for your comment. CHA is currently developing the implementation plan for biennial re-examinations and will notify residents prior to the implementation date.
99	Jeremy Bergstrom/Argent Shriver National Center on Poverty Law	Section IV pp. 52-54 – Triennial Re-examinations for Households with Only Elderly/Disabled Participants and Fixed Income for HCV and Public Housing We support CHA's decision to move to triennial re-examinations for these households. However, the CHA must repeatedly report (beyond the planning documents – actual notice to the residents) this proposed change to residents and inform them of their obligations under the new re-examination program.	Thank you for your comment. CHA is currently developing the implementation plan for triennial re-examinations and will notify residents prior to the implementation date.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
100	Jeremy Bergstrom/Sargent Shriver National Center on Poverty Law	Section IV pp. 54-55 – CHA Re-Entry Pilot Program We laud CHA for agreeing to implement the CCH-CHA Reentry Pilot Program and encourage CHA to move to fully implement it as soon as possible, as well as expand its implementation in a way that provides fair housing opportunities to ex-offenders, who are among those in the community most vulnerable to poverty and homelessness.	Thank you for your comment.
101	Jeremy Bergstrom/Sargent Shriver National Center on Poverty Law	Section V-A p. 60 – Sources and Uses of MTW Funds CHA should specifically and accurately report its reserves, and expend its reserves in a way that maximizes housing opportunity and choice for the tens of thousands of families in need of affordable housing in Chicago.	Thank you for your comment.
102	Leah Levinger/Chicago Housing Initiative	CHA states it will deliver 23,237 housing units by close of FY2015 (p. 7) but in the leasing section (p. 22), CHA indicates that only 18,064 households will be served through CHA's public housing programs. What explains the 5,173 household gap between "units delivered" and families served in the CHA's public housing program? Does CHA's leasing figure (18,064 households to be served) include households to be served through project-based vouchers? If not, can CHA please provide information about total leasing compared with total unit delivery, looking comprehensively at CHA's public housing and project-based voucher programs?	As described in the annual plan, unit delivery totals correspond to CHA's progress toward the 25,000 unit goal, which include both public housing and project-based voucher units. Public housing leasing projections include public housing only. Project-based vouchers are administered through the Housing Choice Voucher program and are included in overall HCV leasing projections for households served. In addition, CHA has included project-based voucher leasing projections in the PBV portion of Section II, as required.
103	Leah Levinger/Chicago Housing Initiative	We commend CHA's decision to begin rehabilitation at Altgeld Gardens and deliver 218 units in FY2015. Rehabilitation is a cost-effective, swift, and reliable method for getting vacant housing back into productive use at a significant scale. We urge CHA to move forward with rehabilitation at the Lathrop Homes and Cabrini Rowhouses as well.	Thank you for your comment.
104	Leah Levinger/Chicago Housing Initiative	Chicago Housing Initiative remains concerned about the intent behind CHA's application to convert over 10,000 public housing units to project-based vouchers under the federal Rental Assistance Demonstration (RAD). While CHA has stated verbally at Board meetings that the CHA does not intend to use RAD as a privatization program—to allow the privatization of ownership of public housing assets—this verbal statement is not reflected anywhere in the discussion about RAD in CHA's Draft 2015 Plan. Since the MTW Plan is an official communication to HUD about CHA's intentions and plans, we urge CHA to make a public declaration in the 2015 MTW Plan that CHA will not allow privatization of ownership and control of public housing resources that are granted entry into the Rental Assistance Demonstration program.	Thank you for your comment. CHA will adhere to all applicable regulations concerning RAD properties and units.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/Organization	Comment	CHA Response
105	Leah Levinger/Chicago Housing Initiative	<p>CHA's 2015 Plan indicates CHA intends to use RAD to refinance properties, but when one reviews CHA's RAD application, the overwhelming majority of properties submitted for conversion under RAD are senior developments which have already been rehabilitated through CHA capital grants, or newly constructed mixed income properties, neither of which are sectors of CHA's housing stock that are in need of refinancing or recapitalization.</p> <p>Can CHA clarify why RAD is needed to assist with refinancing of properties that have no refinancing needs?</p> <p>If instead CHA seeks entry into RAD to create a more stable "funding platform" for its properties, since Congress has not cut voucher appropriations the way Congress has cut public housing appropriations, CHA should state that directly. That rationale could make sense. But to describe RAD as a program to help with "refinancing" is only causing confusion and distrust, because the properties CHA has submitted for RAD conversion are not properties in need of refinancing at all. This profound mismatch between the properties CHA has submitted for conversion, with the CHA's stated rationale for RAD conversions, has had the predictable result of causing residents to question whether CHA has an ulterior motive, and if so, what that ulterior motive is.</p> <p>CHA needs to communicate clearly and consistently--- with residents and with HUD--- about its intentions for the RAD program.</p>	As noted in CHA communication briefs, including the online FAQ sheet and PowerPoint presentation, CHA has applied for RAD to stabilize the funding for, and to preserve and protect CHA housing. While RAD presents an additional benefit of leveraging alternate financing for improvements as needs arise, the primary benefit to CHA is transitioning to a more stable funding platform.
106	Leah Levinger/Chicago Housing Initiative	Can CHA provide additional information about the "Sponsor Based Housing Program" which is described only vaguely on page 8? How does this Sponsor Based Housing Program differ from CHA's normal project-based voucher program? Does the CHA intend to create a separate feeder system or waiting list from the traditional public housing and voucher waiting lists for such "sponsor-based housing"?	Information on the Sponsor-Based Voucher Program has been added to Section II.
107	Leah Levinger/Chicago Housing Initiative	<p>We are concerned by CHA's proposal to count homes that individual voucher-holders use their voucher to purchase towards the CHA's 25,000 unit commitment. Counting a private home that is available for use only by the individual voucher-holding-homeowner seems very inappropriate. The home purchased will never be available for use by another family from the waiting list or family with a right to return. A private home purchased with voucher assistance is not part of Chicago's long-term affordable housing stock, it is simply the private asset of a single voucher holder.</p> <p>We urge CHA to withdraw its proposal to count private homes purchased with voucher assistance from the 25,000 unit count. The CHA's proposal to count these units lacks integrity.</p>	Thank you for your comment.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
108	Leah Levinger/Chicago Housing Initiative	<p>We are grateful CHA has chosen to allow residents living in buildings with expiring HUD mortgages the option of "project-basing" the enhanced voucher these residents are issued from HUD Headquarters. CHA's decision to allow "project-basing" of the new subsidies issued from the federal level achieves three benefits: (1) It drops the rent and utility burdens for families at these two properties down to 30% of income, giving these families a truly affordable rent, (2) it supports the refinancing and rehabilitation of the properties, enabling them to continue as high quality housing for the next 30-40 years, and (3), it locks these units in as affordable community housing for decades to come.</p> <p>The CHA's flexibility and responsiveness at Lake Village East and Kenmore Plaza to support the long-term preservation of these two properties as deeply affordable housing is the type of partnership we hope to see more of this kind of partnership between tenants, developers, and the CHA.</p> <p>It shows the type of good that can happen when there is a shared goal and instead of having to fight against the Housing Authority's attempts to demolish or convert low-income housing to market rate, we can actually combine strengths and work together.</p>	Thank you for your comment.
109	Leah Levinger/Chicago Housing Initiative	<p>As a caveat, I have to say we don't feel it is appropriate for CHA to count the 185 PBVs at Kenmore Plaza and Lake Village East towards the 25,000 unit commitment, since the vouchers we are using to assist families at these two developments are a special allocation from the federal level resulting from mortgage prepayment, rather than the use of CHA's own voucher funds. We urge CHA to reconsider counting these units towards its 25,000 unit goal, and instead treat preservation projects more accurately as a separate initiative.</p> <p>With that caveat aside, we remain very appreciative of CHA's partnership at these two properties and hope to see additional properties preserved as low-income housing through the conversion of enhanced vouchers to project-based vouchers. This has been a good thing for all involved, and a win-win for tenants, property owners, and the overall affordable housing supply in Chicago.</p>	Thank you for your comment.



Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
110	Tami LoveLogan Square Neighborhood Association (LSNA)	I represent my organization, Logan Square Neighborhood Association, on the Lathrop Homes Working Group. I have found several discrepancies in the FY2015 Annual Plan...On Page 18 of the Draft Plan, it states that the Master Plan for the Lathrop Homes "was finalized in Fiscal Year 2014." It also says that "the preliminary Phase 1 unit mix consists of 497 rental units, including 180 CHA, 111 affordable and 206 market-rate." • A final plan has not been presented to the Lathrop Homes Working Group, the CHA Board of Commissioners or to the concerned community at large. • The propose phased 1 housing mix includes way too much market rate and doesn't include a plan to recover over 500 units that would be lost on the north side of Chicago under the current proposed draft. • An Memorandum of Agreement needs to be in place to maintain the currently occupied units and no where does it state that current families will remain on site. I am requesting that the following statement on Page 18: "The Master Plan for the Lathrop Homes was finalized in Fiscal Year 2014. The preliminary Phase 1 unit mix consists of 497 rental units, including 180 CHA, 111 affordable and 206 market-rate." be removed from the draft annual plan.	The Lathrop Homes Working Group and community stakeholders are an integral component of the planning process, which is ongoing. CHA continues to work with stakeholders as it works to pursue zoning approvals, financing and implementation of Phase I in FY2015. CHA has provided further clarification in the annual plan. The unit mix is preliminary and has not yet been finalized. CHA continues to work with stakeholders to move forward with redevelopment plans. As such, the Memorandum of Agreement with residents will follow as redevelopment plans are finalized.
111	Charles Barlow	So I have a couple of comments today. The first one is about the real estate acquisition program. It seems a very innovative way for CHA to be delivering hard units given the climate of things. I think it's a good program. I'm disappointed that there is not more units. I hope to see the plan expand that. A question about it though, is how will it be impacting unit delivery at existing sites? So using Park Boulevard as an example, at the beginning of the plan you promised 465 units, public housing at the site. If you're delivering units like real estate acquisition program or the project-based vouchers program, how will that be impacting that?	CHA continues to provide and expand a variety of affordable housing options for low income housing families in Chicago. CHA also continues to pursue existing and new strategies to achieve the 25,000 unit goal to fulfill the obligations of the MTW Agreement, including the Real Estate Acquisition Program (REAP). CHA is committed to satisfying the needs of families with a Right of Return and wait list applicants through a variety of unit delivery strategies.
112	Charles Barlow	The second comment is, you have brought a very impressive approach in delivering the units through the project-based voucher program with 763 units, which is two-thirds of the units this year. I have a concern about that, given that the distinction between hard and soft units, soft units, CHA does not own them. I'm curious about the longevity of the project-based vouchers units. So how that again, will impact the specific sites.	CHA continues to provide and expand a variety of affordable housing options for low income housing families in Chicago. CHA also continues to pursue existing and new strategies to achieve the 25,000 unit goal to fulfill the obligations of the MTW Agreement and seeks HUD approval as necessary.
113	Charles Barlow	Next, regarding the loss of public housing units at the super block. How will CHA be dealing with the fact that there will be these number of public housing units at that site.	CHA will adjust unit delivery totals to reflect the reduction of Superblock units previously counted toward the 25,000 goal.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
114	Charles Barlow	And the last thing is, I know that the number of plans, proposed plans stated that you will be updating sections later. Will or will there not be an opportunity to provide any comments on the new proposals.	CHA continuously works to improve and adapt the public comment process. The public comment grid is provided to CHA's Board of Commissioners prior to approval of documents that require public comment and the Board is informed of changes to the annual plan. Final, Board-approved documents are made available to the public on CHA's website, including associated public comments and CHA responses, after Board approval.
115	Charles Barlow	My name is Charlie Barlow and I have a few more comments from what I made last night. The first one is linked to the real estate acquisition program. As I said, it seems like a innovative way to get more hard units for the Housing Authority. I know ownership is more widespread. One concern I have though, is you state that you can purchase these units without HUD approval which makes sense given the time sensitive nature of the housing market, but at the same time, will the Chicago Housing Authority be overseen by HUD as it moves forward with this initiative? Will HUD come in and inspect the units after the fact? Also, for units with larger bedroom sizes like four and five and six bedrooms, will this program be focused on increasing the housing structure of large bedroom units for CHA?	Units acquired under this activity, if approved, would also be subject to other HUD approvals and would be reported in CHA's Annual Report. Projected bedroom sizes for REAP in FY2015 are indicated in the "Planned New Public Housing in FY2015" table in Section II.
116	Charles Barlow	Another comment relates to the project-based voucher program, and counting those units toward the 25K unit delivery. Things I would like CHA to address is how the project-based voucher program will impact the number of public housing units versus local lakefront redevelopment, which for CHA is 127 more public housing units to be built at that site. The second example Local Shoresway (sic) [Oakwood Shores]. CHA has promised around another 600 public housing units at that site. I want to know how the project-based vouchers will impact the delivery of those units.	CHA continues to provide and expand a variety of affordable housing options for low income housing families in Chicago. CHA also continues to pursue existing and new strategies to achieve the 25,000 unit goal to fulfill the obligations of the MTW Agreement. CHA is committed to satisfying the needs of families with a Right of Return and wait list applicants through a variety of unit delivery strategies.
117	Charles Barlow	Third comment relates to the Uniform Housing Policy, phase two. In a meeting with the Central Advisory Council in June, that states that CAC recommendations they made for 2012 strategies and recommendations reports, some of those will be included in phase two of the Uniform Housing Policy. I haven't seen any of those suggestions materialize.	CHA will hold meetings with the CAC in order to discuss additional policies. As indicated in the annual plan, CHA will engage residents and other stakeholders in Phase II.

Public Comments on CHA Proposed FY2015 MTW Annual Plan Public Comment Period: September 3 - October 3, 2014			
Comment #	Individual/ Organization	Comment	CHA Response
118	Charles Barlow	Then my final comment relates to the nature of public hearings in general. I'm very grateful and pleased to see that there has been more than one public hearing on this occasion. I think it's very good that CHA has moved away from having a single hearing. However, it's disappointing that the two public comment hearings have fallen within the timeframe that the majority of the local Advisory Council president and Central Advisory staff are away in Atlanta. CHA paid for the presidents to go to Atlanta for a public housing conference, and many of them, I'm sure, would have liked to voice their oral comments on this plan, which affects them and their residents very deeply. I would like to suggest that another comment period be held upon their return, which is this weekend, Or at least giving the Central Advisory Council the opportunity to voice their comments orally in person. Perhaps a meeting could be arranged with the Central Advisory Council before the close of the public comment period. Thank you very much.	CHA continuously works to improve and adapt the public comment process as necessary. CHA held two public comment hearings during the comment period. Public hearings are not the only medium for comment during the public comment period.

**Public Comment Info and Grid- FY2015 MTW Annual Plan Amendment**

Prior to submission of the Amended FY2015 MTW Annual Plan for CHA Board approval, a 30-day public comment period was conducted from July 6 through August 5, 2015. CHA held one public hearing during the comment period, on July 15, 2015 (Charles Hayes Family Investment Center, 4859 S. Wabash), with 6 attendees. The following table includes public comments and CHA responses.

FY2015 MTW Annual Plan Amendment Public Comment Period: July 6 - August 5, 2015			
Comment #	Individual/ Organization	Comment	CHA Response
1	Robert Whitfield	<p>Good morning. This is a comment on the attached draft amendment to the 2015 CHA Moving to Work (MTW) Annual Plan. The draft amendment advised of the demolition of certain units at the Altgeld Gardens complex; and the upcoming Rental Assistance Demonstration (RAD) conversion of certain public housing units to project based Section 8.</p> <p>Given that the draft MTW amendment concerns the initial CHA conversion under RAD, the CHA should consider holding additional public hearings at one or more of the CHA senior buildings to be impacted under the conversion to project based Section 8. Further, given that the Horner Superblock will be part of the initial CHA RAD conversion, CHA should ensure that the required meetings and notices have been issued pursuant to the attached 2014 HUD Notice on relocation under RAD. The HUD Notice requires written notices to all residents at the targeted RAD site where the relocation of residents is projected (which will be the case at the Superblock).</p> <p>Also, the last time CHA issued an amendment to its MTW Annual Plan (in 2014) it provided for three public hearing. Given the newness of the RAD program, and the many questions and the concerns of many residents, it is puzzling why CHA would not consider having additional public hearing so that more CHA residents affected by the conversion can more fully participate.</p>	CHA held two resident meetings at all affected senior sites in April and May of 2015, in advance of the public comment period for the FY2015 MTW Annual Plan Amendment and public hearing on July 15, 2015. CHA will hold resident meetings regarding RAD at the Horner Superblock in the 3rd quarter of 2015. CHA continues to comply with requirements of the HUD RAD notice.

2	Robert Whitfield	<p>Good morning. The following are additional comments on the draft amendments to the Chicago Housing Authority' (CHA) FY 2015 Moving to Work (MTW) Annual Plan. The majority of the proposed CHA amendment focuses on the conversion of various CHA public housing properties to project based Section 8 under the Rental Assistance Demonstration (RAD) program. Page six of the amendment states that Section 3 will 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." It is unclear from the proposed amendment whether Section 3 would continue to apply after the conversion of these units, and the completion of any construction and or rehabilitation.</p> <p>The 2013 Section 3 Voluntary Compliance Agreement (VCA) between CHA and HUD defines Section 3 covered assistance (page 5) to include development assistance, operating assistance, modernization assistance; and other HUD funds utilized for the operation, modernization and or rehabilitation of public housing properties or developments. There appears to be no language in the CHA Section 3 VCA referring to the application of Section 3 to the project based Section 8 program. This could mean, given the CHA's proposal to convert a substantial number of public housing units to project based Section 8 under RAD, less application of Section 3 to the housing that is owned or controlled by CHA. Accordingly, CHA should consider amending the proposed amendment the FY 2015 MTW Annual Plan to clarify that Section 3 will continue to apply to all aspects of housing converted to project based Section 8 under RAD.</p> <p>Amending the proposed amendment to clarify that Section 3 applies to project based units after their conversion under RAD would be consistent with the regulations governing the Section 8 project based program The regulations at 24 CFR Part 983 contain a specific provision stating that Section 3 applies to the project based program. (24 CFR 983.4) The regulations at Part 983 also have a reference to compliance with other Federal requirements (24 CFR 983.8). The other Federal requirements listed at 24 CFR 5.105(a) include compliance with Section 3.</p> <p>CHA should also consider reviewing its other project based housing to ensure that the housing assisted through the CHA project</p>	<p>CHA will continue to comply with its Section 3 VCA as well as all Section 3 regulations as they may apply to the RAD and PRA programs.</p>
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		based program has provisions requiring compliance with the Section 3 program in terms of hiring low income persons, and utilizing low income businesses.	
3	Central Advisory Council	(1) CHA should amend its MTW plan to adjust the minimum rent back down to \$50. There is no good reason for CHA to charge its lowest income residents more than the U.S. Housing Act permits. Moreover, charging very low income residents \$75 per month is contrary to CHA's mission and an unfortunate way to prop up CHA's bottom line.	CHA adopted the \$75 minimum rent policy in FY2009 across public housing and HCV programs. CHA does not currently have plans to adjust this policy. Residents who cannot meet the minimum rent requirement may request hardship remedies.
4	Central Advisory Council	(2) CHA should amend its MTW plan to permit residents of RAD converted buildings to defend against an eviction by raising an "innocent-tenant" defense. This defense would permit a resident to avoid eviction by proving that he or she neither knew nor should have known that a household member or guest engaged in criminal activity. CHA families should not be rendered homeless on account of criminal acts of which the head of household was unaware. One strike policies are draconian and unfairly punitive, rendering young adults and children homeless based on relatively trivial criminal infractions committed by a guest or family member. An innocent tenant defense will go a long way in remedying the policies' overly harsh effects.	Consistent with the ACOP and Chapter 18 of the Administrative Plan, the "innocent-tenant" defense provision will be maintained for those properties where it currently exists.
5	Central Advisory Council	(3) CHA should amend its MTW plan to clarify that any RAD-related relocation rights - articulated in HUD PIH Notices H 2014-09, PIH 2014-17, PIH 2012-32 REV 1, and any other HUD guidance - supplement but do not negate any greater tenant protections found in CHA's Relocation Rights contracts, policies, or consent decrees.	Thank you for your comment. The CHA agrees that it is bound by the terms of the Relocation Rights Contract and the various consent decrees, to which it is a party.
6	Central Advisory Council	(4) Chapter 18-V.N.(l)(a) of its RAD Administrative Plan provides that if a family is overcrowded and CHA does not have enough large units to house all members of the family, the head of household must ask certain household members to leave or face eviction. This policy is unfair and should be amended. These families should be given splits. More specifically, CHA should amend its MTW plan and its RAD Administrative Plan to ensure that RAD conversion does not result in a current household member being evicted from public housing, simply because CHA does not have a large enough unit available to them. If a CHA unit is currently unavailable to house a family without overcrowding, then the family should be permitted to stay in its unit, or, be given a split.	The current language in Chapter 18 of CHA's HCV Administrative Plan related to overcrowding in RAD units is consistent with the policy in the public housing ACOP. A new benefit for residents living in RAD properties is that they are eligible to request a tenant-based voucher and move out of the property after one year of occupancy. This benefit could help families who are overcrowded maintain housing assistance at a different location.

7	Central Advisory Council	(5) CHA should amend its MTW plan to confirm that it will continue to fund and recognize tenant organizations in RAD-converted buildings, just as CHA has funded and recognized those organizations in the past. The language in the proposed 2015 amendment is not sufficiently clear on this point because it states that the organizations will be managed in accordance with current CHA policies and HUD regulations. It is unclear whether CHA believes that its policies and HUD's regulations require it to fund and recognize existing tenant organizations after a RAD conversion. CHA should simply adopt the current public housing tenant organizing regulations for its RAD properties.	Existing tenant organizations at CHA-owned RAD properties will be recognized and funded in accordance with the current CAC Funding Agreement.
8	Central Advisory Council	(6) CHA should fund and recognize tenant councils in mixed-income developments that include RAD-funded units. CHA's decision to obtain a waiver from HUD on this issue was a mistake, as it leaves public housing residents without an adequate voice. CHA should recognize and fund tenant organizations for these mixed income development.	Owners of mixed-income RAD properties will recognize and fund legitimate resident organizations in accordance with the RAD program requirements.
9	Central Advisory Council	(7) CHA should amend its MTW plan to confirm that it will maintain its Family Works and Resident Services programs for residents as they transition to RAD-converted properties and continue them in RAD properties.	CHA intends to continue to provide services, based on CHA's approved budget, to residents living in CHA-owned properties, including properties transitioning to RAD.
10	Central Advisory Council	(8) CHA should amend its MTW plan to provide that Section 8 funding used for the operating assistance of RAD properties shall be subject to the Section 3 rules outlined in 24 C.F.R. § 135.3. Presently, the Section 3 rules do not apply to operating assistance provided to Section 8 properties. This means that property managers of Section 8 properties do not have to make efforts to hire residents for available positions in security, landscaping, administration, etc. Amending the MTW Plan to increase the scope of Section 3 would increase job opportunities for residents by ensuring that property managers (and their subcontractors) hire residents on a regular basis.	CHA will continue to comply with its Section 3 VCA as well as all Section 3 regulations as they may apply to the RAD and PRA programs.
11	Central Advisory Council	(9) CHA should amend its MTW plan so that current residents of CHA senior buildings are not subject to eviction because they exceed 80% of the Area Median Income. Presently, CHA's RAD administrative plan suggests that these seniors can be evicted once their units are converted to RAD. See 18-IV. D. It is critical that these seniors receive a waiver of the 80% Area Median Income requirement and remain in their units. Many of these seniors have been living in the same unit for well over a decade and are ill-equipped to move to a market rate unit elsewhere in the City. Therefore, it appears that residents will be evicted to meet CHA's goal for mixed incomes.	CHA is reviewing its existing policy regarding households that are over-income (over 80% AMI). Current residents at CHA senior RAD buildings will not be subject to re-screening at the time of transition to RAD.

12	Central Advisory Council	(10) CHA should amend its MTW plan to make clear that the Earned Income Disallowance provisions of the ACOP fully apply to RAD converted properties. A resident should not be evicted for being over income if they are receiving the Earned Income Disallowance.	CHA will seek HUD approval to allow the public housing EID policy to be implemented in RAD sites. Households utilizing EID with incomes over 80% AMI are exempt from being terminated due to income.
13	Central Advisory Council	(11) According to HUD's RAD notice, "Where the PHA has an interest in the ownership of the property covered under the PBV contract, the PHA must hire an independent entity, approved by HUD, to perform the housing quality standards (HQS) inspections and rent reasonableness determinations (24 CFR § 983.59). CHA should amend its MTW plan to clarify that this third-party entity selected to perform HQS inspections and rent reasonable determinations will conduct open meetings, publicly post agendas and minutes, and permit public participation in meetings. CHA also should amend its MTW plan to clarify that the entity will be subject to Illinois Freedom of Information Act. Finally, CHA should require the entity to post and solicit public comments for any house rule or tenant selection plan changes, and require notice and solicitation of public comments wherever formerly required by CHA's ACOP.	The independent entity hired by CHA to conduct HQS inspections and rent reasonableness inspections will be the same entity that conducts those functions for the PBV program, and subject to the same requirements that currently exist regarding notices and standards that currently exist. CHA will seek public comment and Board approval for any changes to the HCV Administrative Plan, form of lease, and Tenant Selection Plan for RAD properties. CHA will continue to comply with FOIA requirements.
14	Central Advisory Council	(12) The CHA should amend its MTW plan to permit an HCV resident to sit on the Central Advisory Council. CHA provides its HCV residents little to no resources in the way of organizing, yet HCV residents' input is critical to ensuring that CHA policies reflect HVC families' needs. HCV residents should have a voice on the jurisdiction wide tenant organization.	Under the regulations, the CAC is the jurisdiction wide resident organization for public housing residents. THE CHA does not support an expansion of the regulations.
15	Betty Thompson	How was this notification about this forum given, email, mail? How many HCV mailers? Was mailed?	CHA published official notice of the public comment period through ads in the Chicago Defender, Chicago Sun-Times and Hoy newspapers as well as by posting information on CHA's website. CHA distributed information through the Central Advisory Council, property management, service providers and HCV satellite offices. CHA continuously works to improve and adapt the public comment process as necessary and is considering additional options for resident notification in the future. Public hearings are not the only medium for comment during the public comment period.



16	Lindsey Graves	<p>My name is Lindsey Graves. I'm the president of Vivian Carter Senior Apartments. I want to voice my concerns about the RAD Demonstration Program. First thing I want to emphasize is it is a demonstration, and it needs to be worked on in order – it needs to be worked on to make it more proficient and more fair to the residents and to the city of Chicago. The point I want to stress at this time is that under the current program, there is an issue of how they're going to go about authorizing the buildings, and more importantly, there are issues about people who are in senior housing that are being told that this is a done deal and it's not. And the policies that they are implementing as far as the voucher system that is being changed from currently going from building to building, but now we will also be given a personal voucher. The problem with that, it perpetuates a policy that is discriminatory in nature.</p> <p>The fact is that Chicago is one of the most segregated cities in the United States. As a result of that, the people here are having a program that limits ones mobility in the city. And by simply saying that if you give up your CHA apartment now, you go to the bottom of the list, that is totally unfair and in violation of certain applicable rights that are spelled out under Title I'm saying that we want 236 under Lyndon Johnson and under Clinton and what has occurred under each of those programs, that you will see today are very divisive, not divisive but a very segregated city to which we are not really being to the full benefit for the city. Okay. I have to stop. I just want to point that out.</p> <p>This program has really got to deal with the discriminatory elements and policies. I see litigation coming down the road if it does not address the mobility of people having to move around. And for the vouchers, subsidy is the key word, we don't need vouchers. It will cause homelessness because there is a finite level of value to the vouchers. Every year annually the rent is going up which means ultimately, money from the tenant shall be taken out of their own pocket, which ultimately means they will not be able to afford it. If you have subsidies for the people, it will be distinct and it will beat the system which already exists in the CHA building. Thank you.</p>	<p>RAD does not require any current resident to move or relocate. However there are new options available under RAD for residents who voluntarily choose to move. Residents who live in RAD properties for more than one year are eligible to receive a tenant-based Housing Choice Voucher and move to a privately owned apartment and still pay 30% of their income towards rent.</p>
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17	Francine Washington	<p>I was trying to talk about some other things, what we talked about with our legal attorney, and the RAD conversion, I was wondering why it says that on first page, 207, that CHA may also borrow funds to address capital needs in the future. I think borrowing funds going through RAD and RAD will generate reserve dollars for us. I can't see borrowing funds in the future when we continue to give other folks loans. How can you give out loan when you're borrowing money, money you don't have, that we should keep for ourselves. Then I can't really see us needing to spend that much money on capital needs besides like, needing new paint, carpet, whatever, but we are now spending so much money in these properties. We rehab, rehab. We're on our third rehab. We rehab some of these buildings spending 20, 22 million, and now going back and doubling the price. Something is wrong with that. Somebody needs to – the RAD money should not be for borrowing.</p>	<p>One of the primary functions of RAD is to permit owners to borrow money or raise capital to address the needs of the property. While many of the properties in CHA's RAD plans may not have significant capital needs at this time, CHA will evaluate financial needs and options for each property as the Physical Condition Assessment reports are completed.</p>
18	Francine Washington	<p>And also about the property manager, we should reserve property management. Will we have to pay the property management, the administrative fees or management fees or what? How would that work? And also, talking about the EID, if you're talking about senior housing, public housing, RAD is another form of site based Section 8. We are still giving the residents after the first year, you get the voucher or you can move out. But it's a form of Section 8, and we are doing something here. We're talking about EID, if I'm in family housing and through RAD, why are we not eligible for EID?</p> <p>Under Section 8 you will get EID for disabled people, but I should still be able to get that. It should be put in there. I have worked for years and I need to go back to work. I need washers, dryers, deep freezers. I need to earn some money. You take them back and get credit. We have a lot more to work on, but I just want to tell you that.</p> <p>Those are things you need to pay attention to. You didn't say anything about RAD. CHA said that if you're on disability or a working person, you will have your income reviewed in three years. Does that still stand with RAD?</p> <p>It says something different when you are working, and RAD is talking about phasing in. You can't phase in, if I'm getting earned income. I don't understand that.</p> <p>What do you mean clarify? If I don't understand it, I know they don't either. It's about phasing in. I did not understand that.</p>	<p>Property Managers in RAD sites will continue to be paid a management fee under the terms of their contract, which will be the same as the contract used for public housing property management.</p> <p>CHA will seek HUD approval to allow the public housing EID policy to be implemented in RAD sites. Households utilizing EID with incomes over 80% AMI are exempt from being terminated due to income.</p> <p>The recertification process in RAD properties will be conducted every 2 years for families, and every 3 years for households consisting only of senior and disabled members. Households participating in EID, FSS or Choose to Own Homeownership will continue to be recertified annually.</p>

19	Elder Paula Watson	My name is Elder Paula Watson from Altgeld Brown Apartments, 4949 South Cottage Grove. I have a two-fold question. First of all, is it possible to have a copy of the information regarding the RAD changes that you mentioned earlier?	The information was provided at the meeting.
20	Elder Paula Watson	Thank you. And finally, why was this meeting called at the last minute? We just found out about it yesterday.	CHA published official notice of the public comment period through ads in the Chicago Defender, Chicago Sun-Times and Hoy newspapers as well as by posting information on CHA's website. CHA distributed information through the Central Advisory Council, property management, service providers and HCV satellite offices. CHA continuously works to improve and adapt the public comment process as necessary and is considering additional options for resident notification in the future. Public hearings are not the only medium for comment during the public comment period.
21	Elder Paula Watson	When will we get the grid?	CHA will provide responses to comments received through the public comment process upon Board approval of the FY2015 MTW Annual Plan Amendment in August 2015. The comment grid will be included in the FY2015 MTW Annual Plan Amendment submitted for HUD approval, which will be posted on CHA's website.
22	Francine Washington	I really want to say I have a complaint about the process. We have scattered sites and we have Section 8. And I was wondering, I was doing a comparison, we have a whole lot of folks if this is about summer jobs and doing something for people that we get to work for us, CHA will mail anyone in authority who do Section 8, a flier or newsletter, they will be paying someone to do the service. So why wasn't this mailed out to all the residents? There have been people who we are paying to do us a service who would have mailed it out for them or to them. Section 8, CHA, everybody got postcards in the mail, but we're the residents. We have volunteers. Nothing was mailed out to the residents. So why is that? I thought things were going to change. This is not your first time to hear me say this. Why can't we get mailers like you do other people that you're paying to do us to service? Mr. Jones? We have had this conversation before. Am I correct? Every time they say you're correct. I'm tired of being correct. I want to hear one time, oh, we did it, okay.	CHA published official notice of the public comment period through ads in the Chicago Defender, Chicago Sun-Times and Hoy newspapers as well as by posting information on CHA's website. CHA distributed information through the Central Advisory Council, property management, service providers and HCV satellite offices. CHA continuously works to improve and adapt the public comment process as necessary and is considering additional options for resident notification in the future. Public hearings are not the only medium for comment during the public comment period.

23	Amy Khare	I have actually never commented at one of these meetings so this is kind of exciting, given how much I have thought about these issues. I'm really interested and excited in many ways about RAD. I have heard from around the country that in their cities RAD is providing some radical thinking that is allowing the agencies to shake up what has been in many ways a structure of inflexible rules and rate for residents. So I hope that is the way that CHA will embrace RAD. The rules were passed a while ago. I'm hoping that maybe those can be revisited, since I know it is been a year, year and a half, but those of us who were around during that time during the board meetings, it came and went and some of the materials that were available online like your videos, are no longer available. So it would be great to get that information. That would be great. I have frequently been looking and searching. So if I'm looking and searching and having a hard time, I would encourage people that are thinking about residents needs and interests to do so as well.	Thank you for your comment. The RAD information is currently available on CHA's website.
24	Amy Khare	The question I have really pertains to the MTW extension that is taking place around the country. I'm curious to know the extent to which MTW extension nationally and CHA's approval of that extension will impact RAD. So it will be – will we have some sort of rule when things change if and when CHA gets their new extension? So I'm not sure how public that discussion is right now. It would be great to hear more about CHA's vision for the extension, and what is currently under talks as far as how you are thinking about the future of the extension.	CHA and other MTW agencies continue to work with HUD on terms for the extension of current MTW agreements.
25	Lindsey Graves	You talked about there will be changes to the grievance procedure as far as the current status in the lease agreements. Will it actually be changed through the RAD program?	The grievance procedure for RAD properties mirrors the existing grievance procedure for public housing properties. The RAD grievance procedure was released for public comment in November 2014 and approved by CHA's Board in January 2015. The RAD grievance procedure is now available on CHA's website.

26	Lindsey Graves	<p>Yeah, I too have been studying around the United States on the RAD program and there have been lawsuits in San Francisco and Baltimore that are very interesting. Some of the questions that I have tried to bring here -- as the lady just spoke about earlier and I've just known about this an hour ago so I'm totally unprepared for this. I would appreciate if there was more of a concerted effort to get to the residents of Chicago Housing because it is of great concern to us of change. The point we are trying to stress is that it be done in a fair manner and reasonable. And as I stated before with the voucher system, the voucher system is an unacceptable condition of the new program. It should be rolled over to a subsidized income which guarantees only a third of your income. Under the voucher system, that will change to one's detriment if they accept it. I see it personally, as you push people on the vouchers.</p> <p>Plus there are stipulation in the -- with the RAD program that I found. If you have 20 percent unoccupied buildings, you can then put it up for market to be sold. That's -- there is the motivation there not to take care of maintenance, not to do things in order to keep the buildings up or fully occupied. Furthermore, and I'll leave it at this because I'm totally unprepared, but senior citizen housing. I live in the most dangerous neighborhood in the United States as has been stated. However, in that one building, it's an island of safety for senior citizens. And we have the building, the management and cooperation of the people in that building. We can roam free, do not have any type of situations that can come on the property that is going on elsewhere in the units. All I ask that you will carefully consider these about getting rid of the senior housing. In fact, factually speaking, from the census records, we are baby boomers. We are at the beginning of the boom in senior housing, and I don't see any money being put forth for the property for seniors, which means your children.</p> <p>All I'm asking is, I'm totally unprepared but I'll give a very detailed comment because I do have expertise in Title 7. I understand what's going on here. I don't want -- I'm not against change. When I see a voucher, a voucher is something that will ultimately lead one to homelessness, whereas subsidized guarantees 30 percent of your income for however long you may be in the system.</p>	CHA staff will be meeting with residents at all properties transitioning to the RAD program to describe all of the resident protections, options and benefits.
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27	Elder Paula Watson	<p>I have something else. Okay, you had mentioned earlier that the RAD changes information is available. Can you tell me why it wasn't put on the table with the other information was there?</p> <p>It would be more important to have those changes so we could see them, not have to go on the website.</p> <p>Where can I get them, tonight? Not only for me, for everyone. We have a right to know the changes that are taking place.</p>	<p>Current proposed changes regarding RAD are outlined in the FY2015 MTW Annual Plan Amendment. CHA previously updated RAD resident policies and procedures, which were released for public comment and approved by CHA's Board in January 2015. These previously approved policies are available on CHA's website. The information was provided at the meeting.</p>
28	Lindsay N Graves Jr	<p>I attended the July 15, 2015 meeting at the Charles Hayes family center at 4859 S. Wabash at approximately 6 PM I was appalled at what I saw, there were very few residents from CHA participating and there's a reason for such a poor showing I myself had only been notified of the meeting just two hours before it was to start, the few attendees from CHA that I talked to had the exact same experience. Your notification process lacks the due diligence needed to afford the residents of CHA an opportunity to participate and have a substantive discussion about their concerns. To say the purpose of the meeting is to afford residents an opportunity to voice their concerns without adequate notification is somewhat dingenuous and it affords CHA and the RAD program plausible deniability when the residents' of CHA are directly affected by the actions of these meetings by saying no one voiced any concerns.</p>	<p>CHA published official notice of the public comment period through ads in the Chicago Defender, Chicago Sun-Times and Hoy newspapers as well as by posting information on CHA's website. CHA distributed information through the Central Advisory Council, property management, service providers and HCV satellite offices. CHA continuously works to improve and adapt the public comment process as necessary and is considering additional options for resident notification in the future. Public hearings are not the only medium for comment during the public comment period.</p>
29	Lindsay N Graves Jr	<p>For the record I stated my concerns about the tenet-based vouchers no representative attending the meeting could give me a cash value of the tenant base vouchers I stated Chicago is the most segregated city in the United States and so far what I've seen from the RAD program it would only perpetuate segregation in the city of Chicago there is no denying the undisputed fact communities of color suffer from high poverty and crime rates through decades of benign neglect by various mayor's administrations. The gentrification process that is ongoing in Chicago further exacerbates the situation the case in point Cabrini Green an area that was highly prized real estate a plan was concocted by then current administration at that time to tell the people the buildings were to be torn down and they will be temporarily moved from the area 19 years later out of the 25,000 residents only 2500 have returned this is indicative of tactics that are currently being used in the gentrification process the tenant base vouchers I can assure you tenet based vouchers will not afford CHA residents an opportunity to move in to a low crime low poverty neighborhood rather to crime-ridden neighborhoods on the South and West sides</p>	<p>Thank you for your comment. CHA staff will be meeting with residents at all properties transitioning to the RAD program to describe all of the resident protections, options and benefits. The payment standards are listed in the Participant Reference Guidebook, which is posted on CHA's website.</p>

		<p>and South suburbs there is also a need or should I say crisis for senior housing we are baby boomers 10,000 people a day are reaching retirement age based on recent Social Security statistics but I see no urgency for building new senior housing to meet the demand the senior buildings can be sanctuaries in the most high crime areas like in Englewood where I reside their safe havens furthermore there was an article in the newspapers rental housing is becoming very scarce for people needing affordable housing.</p> <p>The meeting did not adequately clarify policies relevant to right to return to original units with the same square footage that was prior to their temporary move. The grievance procedure makes no mention can residents pursue its unresolved matter in civil court once a decision has been rendered by a arbitrator and the waitlist priority which in the event a senior resident it takes a tenet-based voucher and discover there's no affordable housing in safe neighborhoods the senior resident will be put at the bottom of the list which all-purpose means they can never return to CHA senior housing buildings due to years of back log. The final point I would like to make is I see no policy or program that would change Chicago's status in the as the most segregated city in America.</p>	
30	Lindsay N Graves Jr	<p>I will be forwarding a copy of this letter to state and federal representatives and officials involved with this program I would ask also that you would please understand that most of the people in CHA housing did not possess a college degree or fully understand the legal language that is used in some of these meetings also the timing for some of your most important meetings are conducted in the middle of the most extreme weather months which serves as a deterrent for senior citizens to navigate snowdrifts, extreme cold and sidewalks that are not shoveled.</p>	Thank you for your comment.

31	Jeremy P. Bergstrom, Shriver	<p>Section I, p. 1 and Appendix: Rental Assistance Demonstration Program, p. 2</p> <p>RAD policies, procedures and documents should be created and implemented in ways that protect and promote public interest, oversight and control of federally assisted property converted through the RAD demonstration. CHA should maintain control over wait list policies and procedures and ensure that its wait lists are lawfully and appropriately carried over and managed once properties have been converted under RAD. CHA should ensure that all tenant rights and benefits under traditional public housing carry over after a RAD conversion, such as tenant participation and administrative grievance rights. CHA should ensure that any owner of RAD properties is legally obligated to provide tenants with all these rights and benefits, and should ensure that residents are legally able to enforce them against both the CHA and any owner. CHA should ensure that full-time college students are not subject to any additional eligibility or screening criteria that under traditional public housing, and, in so doing should exercise its MTW waiver authority where necessary.</p>	CHA's RAD Policies are detailed in Chapter 18 of the Administrative Plan, which is modeled on the public housing ACOP. This chapter includes information on how CHA will maintain the same control over waitlists, preserve tenant rights and screening requirements.
32	Jeremy P. Bergstrom, Shriver	<p>Residents Rights, Participation, Waiting List and Grievance Procedures for PBV</p> <p>1. No Rescreening of Tenants Upon Conversion – p. 4</p> <p>CHA should ensure that tenants who become income-ineligible for an assisted unit for any reason related to a RAD conversion be given a superpriority for a market rate unit at their development, if available, or another CHA mixed income development.</p>	RAD requirements related to income do not create such a right and the CHA does not elect to create one.
33	Jeremy P. Bergstrom, Shriver	<p>Residents Rights, Participation, Waiting List and Grievance Procedures for PBV</p> <p>2. Right to Return – p.4</p> <p>CHA should adopt policies that lead to one-for-one replacement of standing units under RAD, as opposed to just occupied units. Where the proposed amendment refers to Horner redevelopment, CHA should include language that recognizes that the relocation process is also subject to applicable court orders.</p>	CHA will comply with RAD regulations and court orders.
34	Jeremy P. Bergstrom, Shriver	<p>Residents Rights, Participation, Waiting List and Grievance Procedures for PBV</p> <p>4. Phase in of Tenant Rent Increases – p. 4</p> <p>We appreciate the CHA's election of a 5 year phase in, and encourage CHA to continue policies that reflect the hardship that any amount of rent increase will be to any family facing an increase. Even a \$25 increase is not insignificant to many residents with low or no income, especially seniors and disabled residents.</p>	Thank you for your comment.



35	Jeremy P. Bergstrom, Shriver	Residents Rights, Participation, Waiting List and Grievance Procedures for PBV 6. Resident Participation and Funding – p.5 We appreciate CHA's commitment to preserve resident participation and funding. CHA should take the opportunity to restore the rights of its residents at mixed income developments to organize tenant councils, and fund them.	Owners of mixed-income RAD properties will recognize and fund legitimate resident organizations in accordance with the RAD program requirements.
36	Jeremy P. Bergstrom, Shriver	Residents Rights, Participation, Waiting List and Grievance Procedures for PBV 7. Resident Procedure Rights – p. 5 We laud CHA for implementing an informal grievance hearing for issues related to tenancy and termination of assistance and encourage CHA to ensure they are available in all such circumstances. CHA should ensure that owners of any RAD property are legally obligated to cooperate with, and be bound by, any such grievance process. CHA should ensure that residents have legally enforceable remedies available to enforce the grievance process.	Thank you for your comment. Owners of RAD properties are required to comply with the CHA's Administrative Plan.
37	Jeremy P. Bergstrom, Shriver	Residents Rights, Participation, Waiting List and Grievance Procedures for PBV 8. Earned Income Disregard – pp. 5,6 To promote the EID's goals, CHA should allow a 3 year phase in of any rent increase following expiration of a resident's EID program. This is consistent with the EID program's 24 month length.	CHA will seek HUD approval to allow the public housing EID policy to be implemented in RAD sites.
38	Jeremy P. Bergstrom, Shriver	1. Access to Records CHA should ensure that residents have access to their records after any RAD conversion, and should acknowledge that FOIA will apply to any CHA-owned or controlled subsidiary. CHA should implement legally enforceable policies and agreements with any RAD owner that require the same access of the resident and the public to records as for traditional public housing.	CHA declines to expand FOIA. CHA declines to expand existing policies or federal regulations on the topic.
39	Jeremy P. Bergstrom, Shriver	4. Administering Wait Lists CHA should acknowledge here that, in some instances, applicable court orders must also be followed. In particular, at Horner, CHA is obligated to follow particular tenant selection criteria required by court order.	CHA agrees that it will follow applicable court orders.
40	Elizabeth Rosenthal, LAF	I. Rental Assistance Demonstration First, 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 conversion now or in the future. CHA has too many vacant units "offline" (close to 3000). Those thousands of vacant units are a critical housing resource and should not be lost to RAD conversion, which is meant to preserve housing long-term for low-income people.	CHA will comply with RAD regulations and court orders.

41	Elizabeth Rosenthal, LAF	<p><b>A. Resident Participation</b> 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.</p>	Existing tenant organizations at CHA-owned RAD properties will be recognized and funded in accordance with the current CAC Funding Agreement.
42	Elizabeth Rosenthal, LAF	CHA should also commit that any future RAD units in mixed-income developments will provide for tenant participation in accordance with Part 964. Public housing residents in mixed-income communities have had no recognized collective voice and CHA should give these residents the same recognition as tenants in traditional public housing converted to RAD.	Owners of mixed-income RAD properties will recognize and fund legitimate resident organizations in accordance with the RAD program requirements.
43	Elizabeth Rosenthal, LAF	<p><b>Resident Grievance Procedures</b> CHA must ensure that any RAD implementation in mixed-income properties is executed in concurrence with contracts that require a private owner to be bound by CHA's grievance processes for RAD properties.</p>	Owners of RAD properties are required to comply with the CHA's Administrative Plan including the grievance process.
44	Elizabeth Rosenthal, LAF	<p><b>Lease Requirements</b> CHA should commit to preserving the "innocent tenant" affirmative defense from its current public housing lease agreement and include it in any RAD leases or lease addenda for RAD properties.</p>	Consistent with the ACOP and Chapter 18 of the Administrative Plan, the "innocent-tenant" defense provision will be maintained for those properties where it currently exists.
45	Elizabeth Rosenthal, LAF	<p><b>Earned Income Disallowance</b> CHA should adopt and continue its Earned Income Disallowance procedures contained in the current Admissions and Continued Occupancy Policy for converted properties and new RAD properties</p>	CHA will seek HUD approval to allow the public housing EID policy to be implemented in RAD sites.
46	Elizabeth Rosenthal, LAF	<p><b>Minimum Rent</b> CHA should apply the standard \$50 minimum rent for RAD units.</p>	CHA adopted the \$75 minimum rent policy in FY2009 across public housing and HCV programs. CHA does not currently have plans to adjust this policy. Residents who cannot meet the minimum rent requirement may request hardship remedies.

47	Elizabeth Rosenthal, LAF	Relocation and Right to Return CHA should acknowledge that HUD PIH Notices H 2014-09, PIH 2014-17, PIH 2012-32 REV 2, and any other HUD guidance on tenant relocation will supplement but not negate any greater tenant protections already part of CHA's Relocation Rights contracts, policies, or obligations under applicable court orders.	Thank you for your comment. The Relocation Rights Contract is referenced in Chapter 18 of the Administrative Plan.
48	Julie Brown, BPI	The Horner Westhaven Superblock is being redeveloped pursuant to court orders in two federal court cases. It is important that the Plan Amendment not contradict the agreements that underlie those orders or the orders themselves. As such, CHA should review the provisions of the Plan Amendment to ensure that there are no conflicts. For example, under the miscellaneous provisions section, paragraph 4, the amendment would keep the Horner Tenant Selection Plan in place after conversion rather than shifting the development to the TSP that governs the rest of Westhaven Park as is required by court order. This issue can be addressed by adding "unless otherwise specified by court order" (or similar language) to the end of the last sentence.	CHA has added clarifying language.



***Description of Planned or Ongoing PHA-Directed Evaluations of the Demonstration***

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

## Annual Statement/Performance and Evaluation Report for MTW and Non-MTW Capital Fund Grants

Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011

<b>Part I: Summary</b>	
<b>PIA Name:</b> CHICAGO HOUSING AUTHORITY	<b>Grant Type and Number</b> Capital Fund Program Grant No: L06P00250114 Date of CFFP: 05/13/2014 Replacement Housing Factor Grant No:
<b>Type of Grant</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:	<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report
<b>Line</b>	<b>Summary by Development Account</b>
<b>Signature of Executive Director</b> 	<b>Date</b> 6/3/2014
<b>Original</b>	<b>Revised</b>
<b>Total Estimated Cost</b>	<b>Total Actual Cost</b>
<b>Signature of Public Housing Director</b> 	<b>Date</b> 4/12/14
<b>Obligated</b>	<b>Expended</b>

PHA Name: CHICAGO HOUSING AUTHORITY	Grant Type and Number Capital Fund Program Grant No: IL06P00250114 Replacement Housing Factor Grant No:	CFFP (Yes/No): No	Federal FFY of Grant: 2014
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[illegible]

<sup>2</sup> To be completed for the Performance and Evaluation Report.

PHA Name:  
CHICAGO HOUSING AUTHORITY

[illegible]

<sup>1</sup> Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

PHA Name:  
CHICAGO HOUSING AUTHORITY

<sup>1</sup> Obligation and expenditure ended can only be revised with HUD approval pursuant to Section 9) of the U.S. Housing Act of 1937, as amended.



Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 4/30/2011

Part I: Summary		PHA Name:		Grant Type and Number		FY of Grant:	
CHICAGO HOUSING AUTHORITY		Capital Fund Program Grant No:		Replacement Housing Factor Grant No: IL06R002502		2015	
		Date of CFFP: 05/13/2014				FY of Grant Approval: 2014	
Type of Grant: <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disaster/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report							
Line	Summary by Development Account	Original	Total Estimated Cost	Revised <sup>1</sup>	Obligated	Total Actual Cost <sup>1</sup>	Expended
1	Total non-CFP Funds						
2	1406 Operations (may not exceed 20% of line 21) <sup>2</sup>						
3	1408 Management Improvements						
4	1410 Administration (may not exceed 10% of line 21)						
5	1411 Audit						
6	1415 Liquidated Damages						
7	1430 Fees and Costs						
8	1440 Site Acquisition						
9	1450 Site Improvement						
10	1460 Dwelling Structures						
11	1465.1 Dwelling Equipment - Nonexpendable						
12	1470 Non-dwelling Structures						
13	1475 Non-dwelling Equipment						
14	1485 Demolition						
15	1492 Moving to Work Demonstration						
16	1495.1 Relocation Costs						
17	1499 Development Activities <sup>3</sup>						
18a	1501 Collateralization or Debt Service paid by the PHA						
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment						
19	1502 Contingency (may not exceed 8% of line 20)						
20	Amount of Annual Grant. (sum of lines 2 - 19)						
21	Amount of line 20 Related to LBP Activities						
22	Amount of line 20 Related to Section 504 Activities						
23	Amount of line 20 Related to Security - Soft Costs						
24	Amount of line 20 Related to Security - Hard Costs						
25	Amount of line 20 Related to Energy Conservation Measures						

<sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>4</sup> RHHF funds shall be included here.

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 Expires 4/30/2011

<b>Part I: Summary</b>		<b>PHIA Name:</b>		<b>Grant Type and Number</b>		<b>FFY of Grant:</b>	
CHICAGO HOUSING AUTHORITY		Date of CFFP: 05/13/2014		Replacement Housing Factor Grant No: IL06R00250		2015 FFY of Grant Approval: 2014	
<b>Type of Grant</b>		<input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (revision no: )			
<input checked="" type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Final Performance and Evaluation Report			
<b>Line</b>	<b>Summary by Development Account</b>	<b>Date</b>	<b>Original</b>	<b>Total Estimated Cost</b>	<b>Revised</b>	<b>Obligated</b>	<b>Total Actual Cost</b>
Signature of Executive Director		6-3-14		Signature of Public Housing Director		4/17/14	
<i>[Signature]</i>				<i>[Signature]</i>			

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

[illegible]

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>2</sup> To be completed for the Performance and Evaluation Report.

Federal FFY of Grant:  
2014

Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Federal FFY of Grant:  
2014[illegible]<sup>1</sup> Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Annual-Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 4/30/2011

Part I: Summary		PHA Name:		Grant Type and Number		FFY of Grant:	
CHICAGO HOUSING AUTHORITY		Capital Fund Program Grant No:		Replacement Housing Factor Grant No: IL06R002501		2015	
Type of Grant		Date of CFFP: 05/13/2014		FFY of Grant Approval:		2014	
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: )		<input type="checkbox"/> Final Performance and Evaluation Report		<input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Original	Total Estimated Cost	Revised <sup>1</sup>	Obligated	Total Actual Cost <sup>1</sup>	Expended
1	Total non-CFP Funds						
2	1406 Operations (may not exceed 20% of line 21) <sup>1</sup>						
3	1408 Management Improvements						
4	1410 Administration (may not exceed 10% of line 21)						
5	1411 Audit						
6	1415 Liquidated Damages						
7	1430 Fees and Costs						
8	1440 Site Acquisition						
9	1450 Site Improvement						
10	1460 Dwelling Structures						
11	1465.1 Dwelling Equipment - Nonexpendable						
12	1470 Non-dwelling Structures						
13	1475 Non-dwelling Equipment						
14	1485 Demolition						
15	1492 Moving to Work Demonstration						
16	1495.1 Relocation Costs						
17	1499 Development Activities <sup>1</sup>						
18a	1501 Collateralization or Debt Service paid by the PHA						
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment						
19	1502 Contingency (may not exceed 8% of line 20)						
20	Amount of Annual Grant: (sum of lines 2 - 19)						
21	Amount of line 20 Related to LBP Activities						
22	Amount of line 20 Related to Section 504 Activities						
23	Amount of line 20 Related to Security - Soft Costs						
24	Amount of line 20 Related to Security - Hard Costs						
25	Amount of line 20 Related to Energy Conservation Measures						

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.  
<sup>4</sup> RHF funds shall be included here.

15 JULY 2005





Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 4/30/2011

Part I: Summary		Grant Type and Number		FFY of Grant:	
PIIA Name:		Capital Fund Program Grant No. IL08P00250113		2014	
CHICAGO HOUSING AUTHORITY		Replacement Housing Factor Grant No:		FFY of Grant Approval:	
		Date of CFP: 9/9/2013		2013	
Type of Grant					
<input checked="" type="checkbox"/> Original Annual Statement					
<input type="checkbox"/> Performance and Evaluation Report for Period Ending:					
<input type="checkbox"/> Reserve for Disasters/Emergencies					
<input type="checkbox"/> Revised Annual Statement (revision no: )					
<input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Original	Revised <sup>1</sup>	Obligated	Total Actual Cost <sup>1</sup>
1	Total non-CFP Funds				Expended
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment - Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	\$43,459,387			
16	1495.1 Relocation Costs				
17	1499 Development Activities <sup>4</sup>				
18a	1501 Collateralization or Debt Service paid by the PIIA				
18ba	4000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$43,459,387			
21	Amount of line 20 Related to IBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

<sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PIAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>4</sup> RIIF funds shall be included here.

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 Expires 4/30/2011

<b>Part I: Summary</b>	
<b>PHA Name:</b> CHICAGO HOUSING AUTHORITY	<b>Grant Type and Number</b> Capital Fund Program Grant No. IL06P00250113 Date of CFFP: 9/9/2013
<b>Type of Grant</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: Line Summary by Development Account	<b>FFY of Grant:</b> 2014 <b>FFY of Grant Approval:</b> 2013
<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report	<b>Replacement Housing Factor Grant No:</b>
<b>Signature of Executive Director</b> <i>[Signature]</i> Public Housing Director	<b>Signature of Public Housing Director</b> <i>[Signature]</i> Executive Director
<b>Date</b> 9-9-2013	<b>Date</b> 8/24/13
<b>Original</b>	<b>Revised</b>
<b>Total Estimated Cost</b>	<b>Total Actual Cost</b>
<b>Obligated</b>	<b>Expended</b>

[illegible]

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

To be completed for the Performance and Evaluation Report.



Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

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Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 4/30/2011

<b>Part I: Summary</b>		<b>Grant Type and Number</b> Capital Fund Program Grant No: Date of CFP: 9/9/2013		<b>Replacement Housing Factor Grant No:</b> IL06R0025014		<b>FY of Grant:</b> 2014	
<b>PIHA Name:</b> <b>CHICAGO HOUSING AUTHORITY</b>						<b>FY of Grant Approval:</b> 2013	
<b>Type of Grant</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (revision no: )			
<b>Summary by Development Account</b>		<b>Total Estimated Cost</b>		<b>Revised<sup>1</sup></b>		<b>Total Actual Cost<sup>1</sup></b>	
<b>Line</b>		<b>Original</b>	<b>Obligated</b>	<b>Expend</b>			
1	Total non-CFP Funds						
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>						
3	1408 Management Improvements						
4	1410 Administration (may not exceed 10% of line 21)						
5	1411 Audit						
6	1415 Liquidated Damages						
7	1430 Fees and Costs						
8	1440 Site Acquisition						
9	1450 Site Improvement						
10	1460 Dwelling Structures						
11	1465 J Dwelling Equipment - Nonexpendable						
12	1470 Non-dwelling Structures						
13	1475 Non-dwelling Equipment						
14	1485 Demolition						
15	1492 Moving to Work Demonstration						
16	1495 J Relocation Costs	\$9,451,933					
17	1499 Development Activities <sup>4</sup>						
18a	1501 Collateralization or Debt Service paid by the PIHA						
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment						
19	1502 Contingency (may not exceed 8% of line 20)						
20	Amount of Annual Grant (sum of lines 2 - 19)	\$9,451,933					
21	Amount of line 20 Related to I RP Activities						
22	Amount of line 20 Related in Section 504 Activities						
23	Amount of line 20 Related to Security - Soft Costs						
24	Amount of line 20 Related to Security - Hard Costs						
25	Amount of line 20 Related to Energy Conservation Measures						

<sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PIHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>4</sup> RIHF funds shall be included here.



Annual Statement/Performance and Evaluation Report  
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U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011

<b>Part I: Summary</b>	
<b>PIA Name:</b> <b>CHICAGO HOUSING AUTHORITY</b>	<b>Grant Type and Number</b> Capital Fund Program Grant No: IL06R002504 Date of CFFP: 9/9/2013
<b>Type of Grant</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:	<b>FFY of Grant:</b> 2014 FFY of Grant Approval: 2013
<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending:	<b>Replacement Housing Factor Grant No:</b> IL06R002504
<b>Line</b>	<b>Summary by Development Account</b>
<b>Signature of Representative Director</b> Date: 9-9-13	<b>Signature of Public Housing Director</b> Date: 8/24/13
<b>Total Estimated Cost</b>	<b>Total Actual Cost</b>
<b>Original</b>	<b>Revised</b>
<b>Obligated</b>	<b>Expended</b>



<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>2</sup> To be completed for the Performance and Evaluation Report.



Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

**U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011**

[illegible]

<sup>1</sup> Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 4/30/2011

<b>Part I: Summary</b>		<b>Grant Type and Number</b> Capital Fund Program Grant No: 9/9/2013		<b>FFY of Grant:</b> 2014	
<b>PHIA Name:</b> CHICAGO HOUSING AUTHORITY		<b>Replacement Housing Factor Grant No:</b> IL06R002502		<b>FFY of Grant Approval:</b> 2013	
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report	
<b>Line</b>	<b>Summary by Development Account</b>	<b>Original</b>	<b>Revised<sup>1</sup></b>	<b>Obligated</b>	<b>Total Actual Cost<sup>1</sup></b>
1	Total non CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment - Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities <sup>4</sup>				
18a	1501 Collateralization or Debt Service paid by the PHIA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$21,124,978			
21	Amount of line 20 Related to I BP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

<sup>1</sup> To be completed for the Performance and Evaluation Report


<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>4</sup> RHH funds shall be included here.

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 Expires 4/30/2011

<b>Part I: Summary</b>	
<b>PHA Name:</b> CHICAGO HOUSING AUTHORITY	<b>Grant Type and Number</b> Capital Fund Program Grant No: IL06R002502 Date of CFFP: 9/9/2013
<b>Type of Grant</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Summary by Development Account	<b>FFY of Grant:</b> 2014 FFY of Grant Approval: 2013
<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (Revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report	<b>Replacement Housing Factor Grant No:</b> IL06R002502
<b>Line</b>	<b>Total Estimated Cost</b>
<b>Signature of Executive Director</b>  Date 9-9-13	<b>Total Actual Cost</b> Obligated Expended Date 8/24/13







[illegible]

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>2</sup> To be completed for the Performance and Evaluation Report.

[illegible]

<sup>1</sup> Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9(j) of the U.S. Housing Act of 1937, as amended.

Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.



Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 4/30/2011

## Part I: Summary

PHA Name: <b>CHICAGO HOUSING AUTHORITY</b>		Grant Type and Number Capital Fund Program Grant No.: IL06P00250112 Date of CFFP: 3/12/2012		Replacement Housing Factor Grant No.:		FFY of Grant: 2013 FFY of Grant Approval: 2012	
Type of Grant: <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report							
Line	Summary by Development Account	Original	Total Estimated Cost	Revised <sup>2</sup>	Obligated	Total Actual Cost <sup>1</sup>	Expended
1	Total non-CFP Funds						
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>						
3	1408 Management Improvements						
4	1410 Administration (may not exceed 10% of line 21)						
5	1411 Audit						
6	1413 Liquidated Damages						
7	1430 Fees and Costs						
8	1440 Site Acquisition						
9	1450 Site Improvement						
10	1460 Dwelling Structures						
11	1465.1 Dwelling Equipment—Nonexpendable						
12	1470 Non-dwelling Structures						
13	1475 Non-dwelling Equipment						
14	1483 Demolition						
15	1492 Moving to Work Demonstration						
16	1493.1 Relocation Costs						
17	1499 Development Activities <sup>4</sup>						
18a	1501 Collateralization or Debt Service paid by the PHA						
18b	9000 Collateralization or Debt Service paid Via System of Direct Payment						
19	1502 Contingency (may not exceed 8% of line 20)						
20	Amount of Annual Grant: (sum of lines 2 – 19)			\$44,733,895			
21	Amount of line 20 Related to LBP Activities						
22	Amount of line 20 Related to Section 504 Activities						
23	Amount of line 20 Related to Security – Soft Costs						
24	Amount of line 20 Related to Security – Hard Costs						
25	Amount of line 20 Related to Energy Conservation Measures						

<sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>4</sup> RHHF funds shall be included here.

Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011

<b>Part I: Summary</b>	
PHA Name: <b>CHICAGO HOUSING AUTHORITY</b>	Grant Type and Number Capital Fund Program Grant No. IL06P00250112 Date of CFFP: 3/12/2012 Replacement Housing Factor Grant No.: FFY of Grant: 2013 FFY of Grant Approval: 2012
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: Line Summary by Development Account	<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report
Signature of Executive Director	Original Date Total Estimated Cost Revised Obligated Total Actual Cost Expended Date





PHIA Name: CHICAGO HOUSING AUTHORITY	Grant Type and Number Capital Fund Program Grant No: IL06PD00250112 Replacement Housing Factor Grant No:	CFIP (Yr/s) No: No 2012	Federal FPY of Grant:
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[illegible]

form HUD-50075.1 (4/2008)



PHA Name:  
CHICAGO HOUSING AUTHORITY

[illegible]

<sup>1</sup> Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

PHA Name:  
CHICAGO HOUSING AUTHORITY

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Page 6 of 6

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**Annual Statement/Performance and Evaluation Report**  
**Capital Fund Program, Capital Fund Program Replacement Housing Factor and**  
**Capital Fund Financing Program**

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 4/30/2011

**Part I: Summary**

<b>PIA Name:</b> CHICAGO HOUSING AUTHORITY		<b>Grant Type and Number</b> Capital Fund Program Grant No. _____ Date of CFFP: 3/7/2012		<b>Replacement Housing Factor Grant No:</b> IL06R002501		<b>FY of Grant:</b> 2013 FY of Grant Approval: 2012	
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending: _____				<input type="checkbox"/> Revised Annual Statement (revision no: _____) <input type="checkbox"/> Final Performance and Evaluation Report			
<b>Type of Grant</b>	<b>Line</b>	<b>Summary by Development Account</b>	<b>Original</b>	<b>Total Estimated Cost</b>	<b>Revised <sup>1</sup></b>	<b>Obligated</b>	<b>Total Actual Cost <sup>1</sup></b>
1	Total non-CFF Funds						
2	1406 Operations (may not exceed 20% of line 21) <sup>2</sup>						
3	1408 Management Improvements						
4	1410 Administration (may not exceed 10% of line 21)						
5	1411 Audit						
6	1415 Liquidated Damages						
7	1430 Fees and Costs						
8	1440 Site Acquisition						
9	1450 Site Improvement						
10	1460 Dwelling Structures						
11	1465.1 Dwelling Equipment—Nonexpendable						
12	1470 Non-dwelling Structures						
13	1475 Non-dwelling Equipment						
14	1485 Demolition						
15	1492 Moving to Work Demonstration						
16	1495.1 Relocation Costs		\$12,416,998				
17	1499 Development Activities <sup>4</sup>						
18a	1501 Collateralization or Debt Service paid by the PIA						
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment						
19	1502 Contingency (may not exceed 8% of line 20)						
20	Amount of Annual Grant (sum of lines 2 – 19)		\$12,416,998				
21	Amount of line 20 Related to LBP Activities						
22	Amount of line 20 Related to Section 504 Activities						
23	Amount of line 20 Related to Security – Soft Costs						
24	Amount of line 20 Related to Security – Hard Costs						
25	Amount of line 20 Related to Energy Conservation Measures						

<sup>1</sup> To be completed for the Performance and Evaluation Report.<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.<sup>3</sup> PIAs with under 250 units in management may use 100% of CFF Grants for operations.<sup>4</sup> RHP funds shall be included here.

Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011

<b>Part I: Summary</b>	
PHA Name: <b>CHICAGO HOUSING AUTHORITY</b>	Grant Type and Number Capital Fund Program Grant No. _____ Date of CFP: 3/12/2012
Replacement Housing Factor Grant No. IL06R00250	
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: _____	<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report
Line	Summary by Development Account
Signature of Executive Director	Date
Original	Total Estimated Cost
Signature of Public Housing Director	Revised
Obligated	Total Actual Cost
Date	Expended





PHA Name:  
CHICAGO HOUSING AUTHORITY

[illegible]<sup>1</sup> Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.







**Annual-Statement/Performance and Evaluation Report**  
**Capital Fund Program, Capital Fund Program Replacement Housing Factor and**  
**Capital Fund Financing Program**

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 4/30/2011

**Part I: Summary**

<b>PHA Name:</b> CHICAGO HOUSING AUTHORITY		<b>Grant Type and Number</b> Capital Fund Program Grant No: Date of CFPP: 3/12/2012		<b>Replacement Housing Factor Grant No:</b> LD06R002502		<b>FY of Grant:</b> 2013 FY of Grant Approval: 2012	
<b>Type of Grant</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report							
<b>Line</b>	<b>Summary by Development Account</b>	<b>Original</b>	<b>Total Estimated Cost</b>	<b>Revised <sup>2</sup></b>	<b>Obligated</b>	<b>Total Actual Cost <sup>1</sup></b>	<b>Expended</b>
1	Total non-CFP Funds						
2	1406 Operations (may not exceed 20% of line 21) <sup>2</sup>						
3	1408 Management Improvements						
4	1410 Administration (may not exceed 10% of line 21)						
5	1411 Audit						
6	1415 Liquidated Damages						
7	1430 Fees and Costs						
8	1440 Site Acquisition						
9	1450 Site Improvement						
10	1460 Dwelling Structures						
11	1465 I Dwelling Equipment—Nonexpendable						
12	1470 Non-dwelling Structures						
13	1475 Non-dwelling Equipment						
14	1485 Demolition						
15	1492 Moving to Work Demonstration						
16	1495 I Relocation Costs						
17	1499 Development Activities <sup>4</sup>						
18a	1501 Collateralization or Debt Service paid by the PHA						
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment						
19	1502 Contingency (may not exceed 5% of line 20)						
20	Amount of Annual Grant: (sum of lines 2 – 19)						
21	Amount of line 20 Related to LBP Activities		\$23,555,209				
22	Amount of line 20 Related to Section 504 Activities						
23	Amount of line 20 Related to Security – Soft Costs						
24	Amount of line 20 Related to Security – Hard Costs						
25	Amount of line 20 Related to Energy Conservation Measures						

<sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>4</sup> RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 Expires 4/30/2011

<b>Part I: Summary</b>	
PHA Name: <b>CHICAGO HOUSING AUTHORITY</b>	Grant Type and Number Capital Fund Program Grant No: _____ Date of CFPP: 3/12/2012
Replacement Housing Factor Grant No: IL06R002502	
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: _____	FFY of Grant: 2013 FFY of Grant Approval: 2012
<input type="checkbox"/> Reserve for Disasters/Emergencies	<input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report
Line Summary by Development Account	Total Estimated Cost
Signature of Executive Director	Signature of Public Housing Director
Date	Date
	Total Actual Cost
	Expend

1

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

PHA Name: CHICAGO HOUSING AUTHORITY	Grant Type and Number Capital Fund Program Grant No.: Replacement Housing Factor Grant No.: LU6R00250212	CFPP (Yes/No): No	Federal FFY of Grant: 2012
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PHA Name:  
CHICAGO HOUSING AUTHORITY

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Page 5 of 6

form HUD-50075.1 (4/2008)

PHA Name:  
CHICAGO HOUSING AUTHORITY

[illegible]

<sup>1</sup> Obligation and expenditure ended can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

**Annual Statement/Performance and Evaluation Report**  
**Capital Fund Program, Capital Fund Program Replacement Housing Factor and**  
**Capital Fund Financing Program**

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 4/30/2011

Part I: Summary		Grant Type and Number		Replacement Housing Factor Grant No. H 06R002501		FFY of Grant:	
PHA Name:		Capital Fund Program Grant No.		Date of CFPP		2012	
CHICAGO HOUSING AUTHORITY		8/3/2011				FFY of Grant Approval:	
						2011	
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:							
<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report							
Line	Summary by Development Account	Original	Revised <sup>1</sup>	Total Estimated Cost	Obligated	Total Actual Cost <sup>1</sup>	Expended
1	Total non-CFP Funds						
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>						
3	1408 Management Improvements						
4	1410 Administration (may not exceed 10% of line 21)						
5	1411 Audit						
6	1415 Liquidated Damages						
7	1430 Fees and Costs						
8	1440 Site Acquisition						
9	1450 Site Improvement						
10	1460 Dwelling Structures						
11	1465 1 Dwelling Equipment—Nonexpendable						
12	1470 Non-dwelling Structures						
13	1475 Non-dwelling Equipment						
14	1485 Demolition						
15	1492 Moving to Work Demonstration						
16	1495 1 Relocation Costs						
17	1499 Development Activities <sup>4</sup>						
18a	1501 Collateralization or Debt Service paid by the PHA						
18ba	9999 Collateralization or Debt Service paid Via System of Direct Payment						
19	1502 Contingency (may not exceed 8% of line 20)						
20	Amount of Annual Grant (sum of lines 2 - 19)						
21	Amount of line 20 Related to LBP Activities						
22	Amount of line 20 Related to Section 504 Activities						
23	Amount of line 20 Related to Security—Soft Costs						
24	Amount of line 20 Related to Security—Hard Costs						
25	Amount of line 20 Related to Energy Conservation Measures						

<sup>1</sup> To be completed for the Performance and Evaluation Report


<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations

<sup>4</sup> RHP funds shall be included here



Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program  
 U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 Expires 4/30/2011

<b>Part I: Summary</b>		<b>FFY of Grant:</b> 2012	
<b>PHA Name:</b> CHICAGO HOUSING AUTHORITY	<b>Grant Type and Number</b> Capital Fund Program Grant No Date of CFP 8/3/2011	<b>Replacement Housing Factor Grant No</b> II 06R00250	<b>FFY of Grant Approval:</b> 2011
<b>Type of Grant</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Funding: <input type="checkbox"/> Reserve for Disaster/Emergencies <input type="checkbox"/> Summary by Development Account		<input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report	
<b>Line</b>	<b>Original</b>	<b>Revised</b>	<b>Expended</b>
<b>Total Estimated Cost</b>		<b>Total Actual Cost</b>	
<b>Signature of Executive Director</b> 		<b>Signature of Public Housing Director</b> 	
<b>Date</b> AUG 03 2011		<b>Date</b> 7-26-11	



<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>2</sup> To be completed for the Performance and Evaluation Report.

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
**Expires 4/30/2011**

Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program[illegible]

<sup>1</sup> (Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

<sup>1</sup> Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 4/30/2011

Part I: Summary		Grant Type and Number		Replacement Housing Factor Grant No.		FFY of Grant:	
PHA Name:		Capital Fund Program Grant No. IL06P00250111		Date of CFP: 8/3/2011		2012 2011	
CHICAGO HOUSING AUTHORITY							
Type of Grant		<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Original	Revised <sup>1</sup>	Obligated	Total Actual Cost <sup>1</sup>		
1	Total non-CFP Funds						
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>						
3	1408 Management Improvements						
4	1410 Administration (may not exceed 10% of line 21)						
5	1411 Audit						
6	1415 Liquidated Damages						
7	1430 Fees and Costs						
8	1440 Site Acquisition						
9	1450 Site Improvement						
10	1460 Dwelling Structures						
11	1465.1 Dwelling Equipment - Nonexpendable						
12	1470 Non-dwelling Structures						
13	1475 Non-dwelling Equipment						
14	1485 Demolition						
15	1492 Moving to Work Demonstration						
16	1495.1 Relocation Costs						
17	1499 Development Activities <sup>4</sup>						
18a	1501 Collateralization or Debt Service paid by the PHA						
18b	9000 Collateralization or Debt Service paid Via System of Direct Payment						
19	1502 Contingency (may not exceed 8% of line 20)						
20	Amount of Annual Grant (sum of lines 2 - 19)	\$50,513,426					
21	Amount of line 20 Related to I BP Activities						
22	Amount of line 20 Related to Section 504 Activities						
23	Amount of line 20 Related to Security - Soft Costs						
24	Amount of line 20 Related to Security - Hard Costs						
25	Amount of line 20 Related to Energy Conservation Measures						

<sup>1</sup> To be completed for the Performance and Evaluation Report

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP (trans for operations

<sup>4</sup> RHP funds shall be included here

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 Expires 4/30/2011

<b>Part I: Summary</b>		<b>FFY of Grant:</b> 2012	
<b>PIA Name:</b> CHICAGO HOUSING AUTHORITY	<b>Grant Type and Number</b> Capital Fund Program Grant No. IL06P00250111 Date of CFFP 8/3/2011	<b>Replacement Housing Factor Grant No</b>	<b>FFY of Grant Approval:</b> 2011
<b>Type of Grant</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: Line Summary by Development Account	<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report	<b>Total Estimated Cost</b>	<b>Total Actual Cost<sup>1</sup></b>
<b>Signature of Executive Director</b> <i>[Signature]</i>	<b>Date</b> AUG 03 2011	<b>Obligated</b> <i>[Signature]</i>	<b>Expended</b> <i>[Signature]</i>
<b>Signature of Public Housing Director</b> <i>[Signature]</i>		<b>Date</b> 7-26-2011	



<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>2</sup> To be completed for the Performance and Evaluation Report.

☐ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
☐ To be completed for the Performance and Evaluation Report.



(c) obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

PIA Name:  
CHICAGO HOUSING AUTHORITY

[illegible]

<sup>1</sup> Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 4/30/2011

<b>Part I: Summary</b>		<b>PHA Name:</b> <b>CHICAGO HOUSING AUTHORITY</b>		<b>Grant Type and Number</b> Capital Fund Program Grant No. Date of CFFP: 8/3/2011		<b>Replacement Housing Factor Grant No.</b> IL06R002502		<b>FY of Grant:</b> 2012 <b>FY of Grant Approval:</b> 2011	
<b>Type of Grant</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report					
<b>Line</b>	<b>Summary by Development Account</b>	<b>Original</b>	<b>Total Estimated Cost</b>	<b>Revised <sup>1</sup></b>	<b>Obligated</b>	<b>Total Actual Cost <sup>1</sup></b>			
1	Total non-CFF Funds								
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>								
3	1408 Management Improvements								
4	1410 Administration (may not exceed 10% of line 21)								
5	1411 Audit								
6	1415 Liquidated Damages								
7	1430 Fees and Costs								
8	1440 Site Acquisition								
9	1450 Site Improvement								
10	1460 Dwelling Structures								
11	1465 1 Dwelling Equipment - Nonexpendable								
12	1470 Non-dwelling Structures								
13	1475 Non-dwelling Equipment								
14	1485 Demolition								
15	1492 Moving to Work Demonstration								
16	1495 1 Relocation Costs								
17	1499 Development Activities <sup>4</sup>								
18a	1501 Collateralization or Debt Service paid by the PLA								
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment								
19	1502 Contingency (may not exceed 8% of line 20)								
20	Amount of Annual Grant (sum of lines 2 - 19)	\$27,950,529							
21	Amount of line 20 Related to IHP Activities								
22	Amount of line 20 Related to Section 504 Activities								
23	Amount of line 20 Related to Security - Soft Costs								
24	Amount of line 20 Related to Security - Hard Costs								
25	Amount of line 20 Related to Energy Conservation Measures								

<sup>1</sup> To be completed for the Performance and Evaluation Report



<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement

<sup>3</sup> PIAs with under 250 units in management may use 100% of CFF Grants for operations

<sup>4</sup> RHP funds shall be included here.

Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011

<b>Part I: Summary</b>	
<b>PIA Name:</b> CHICAGO HOUSING AUTHORITY	<b>Grant Type and Number</b> Capital Fund Program Grant No Date of CFFP 8/3/2011
<b>FFY of Grant:</b> 2012 <b>FFY of Grant Approval:</b> 2011	<b>Replacement Housing Factor Grant No</b> IL06R002508
<b>Type of Grant</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: Line Summary by Development Account	<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report
<b>Signature of Executive Director</b> 	<b>Signature of Public Housing Director</b> 
<b>Date</b> AUG 3 2011	<b>Date</b> 7-26-11
<b>Total Estimated Cost</b> Original	<b>Total Actual Cost</b> Obligated
<b>Expenditures</b> Expended	Expended

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>2</sup> To be completed for the Performance and Evaluation Report.

[illegible]

To be completed for the Performance and Evaluation Report.



Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

<sup>1</sup> Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.





# Appendices



## **Appendices**

### ***CHA Local Asset Management Plan***

CHA's Amended and Restated MTW Agreement 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 costs	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 - Affirmatively Furthering Fair Housing***

### ***Physical Housing Stock—Public Housing***

Chicago Housing Authority (CHA) entered into a Section 504 Voluntary Compliance Agreement (VCA) with the U.S. Department of Housing and Urban Development (HUD) in May 2006. The VCA resulted from a review under Section 504 of both CHA's housing and non-housing programs. The VCA outlined a number of benchmarks that CHA had to complete in order to come into full compliance with all federal accessibility regulations and to meet the need of the local disabled community eligible for its housing program. In May 2013, CHA successfully completed all the benchmarks required in its Section 504 VCA with HUD. The VCA lasted seven years over which time CHA completed the rehabilitation and redevelopment of 1,307 units for people with mobility impairments and 400 units for people with sensory impairments. All of the units comply with the Uniform Federal Accessibility Standards (UFAS) as required by HUD.

CHA continues to incorporate accessibility standards into its construction, ensuring that housing is provided for people with disabilities both currently residing in CHA housing and those on its waiting lists. Whereas most housing authorities provide 5.0% and 2.0% of its housing for people with mobility and sensory impairments respectively, CHA provides 5.3% and 2.1%. Currently, CHA has certified that 6% of its housing stock is accessible for people with mobility impairments.

CHA also works extensively with the City of Chicago to comply with the City of Chicago's Building Code, specifically Chapter 18-11 that addresses issues of accessibility. In CHA's newly redeveloped properties, 20% of the developments are mandated to be made accessible for people with disabilities and the CHA works with its developers to build the required units.

### ***Non-Housing Programs***

CHA has a department of four staff dedicated to addressing issues of fair housing and disability in subsidized housing. The Housing Rights and Nondiscrimination Department (HRND) is responsible for bringing and keeping the entire housing authority in compliance with all applicable fair housing and disability-related regulations. HRND monitors and addresses issues of fair housing discrimination as well as issues decisions on reasonable accommodations for both public housing and Housing Choice Voucher (HCV) participants.

HRND organizes and facilitates Authority-wide trainings on issues of fair housing and disability. For the past several years, CHA staff for public housing and HCV, including all Private Property Managers of CHA's public housing portfolios and all HCV contract vendors, has been mandated to attend training to learn about updated policies and procedures relative to fair housing and disability. HRND educates the audience on specific issues such as Violence against Women Act updates; the CHA's Fair Housing Discrimination Complaint Procedure; and the reasonable accommodation process.

In the HCV Program, CHA created the first of its kind Modification Fund, which consists of a pool of money set-aside for the construction and installation of accessibility features and devices like grab bars, lifts, ramps, and sensory equipment, for HCV participants who need such features to utilize their HCV. Since its inception, CHA has provided necessary modifications to over 500 HCV participants who may otherwise not have been able to find affordable, accessible private market housing. CHA anticipates continuing this program through an intergovernmental agreement with the City of Chicago's Mayor's Office for People with Disabilities.

Additionally, CHA has been partnering with the disability advocacy agency, Access Living of Metropolitan Chicago, to administer HCVs to persons transitioning from institutions/nursing homes into the community. Every year, CHA delivers up to 3% of its non-targeted funding for this population. Access Living and CHA have experienced great

success by transitioning over 100 formally institutionalized individuals and their families into private market housing. CHA plans to continue these efforts as well as designate units within its Property Rental Assistance (PRA) Program for the same population.

CHA developed and implemented a comprehensive fair housing testing and survey report that outlined the barriers to housing choice encountered by public housing residents and HCV participants. This report helped shape the CHA's policies and procedures and identified areas where CHA is able to remove housing impediments. CHA continues to work to rectify any identified impediments and revisits policies and procedures to determine if any additional changes are necessary.

CHA is currently working with several partners to eliminate fair housing impediments, including, Access Living, The Chicago Lawyers' Committee for Civil Rights Under Law, the John Marshall Fair Housing Clinic, and the Chicago Commission on Human Relations.

## Rental Assistance Demonstration Program

The Chicago Housing Authority (CHA) is amending the FY2015 Moving to Work Annual Plan to reflect additional public housing developments anticipated for the Rental Assistance Demonstration (RAD) Program. These developments are included in CHA's RAD portfolio application but were previously designated as part of a second phase of conversion. CHA is now moving forward to have these transactions ready for potential Phase One conversions if needed to replace other planned Phase One developments. CHA is required to convert 50 percent of its portfolio application within one year of receiving the CHAP awards and the ability to use one or all of these properties as replacements will allow CHA to meet that requirement.

CHA previously amended the FY2014 MTW Annual Plan with required RAD elements in anticipation of becoming a successful RAD applicant. This FY2015 MTW Annual Plan Amendment includes the same content except for relevant updates since the approved FY2014 MTW Annual Plan Amendment.

Through RAD, CHA will be converting select properties to Project-Based Vouchers (PBV) under the guidelines of PIH Notice 2012-32, REV-2 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-2 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 to 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.

Specific information related to the additional public housing developments anticipated for RAD Phase 1 follows.

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
Mary Jane Richardson and Maudelle Brown Bousefield	IL002079000	PBV	266	OBR=87 1BR=177 2BR=2	Senior	TBD
Kenneth Campbell	IL002082000	PBV	165	OBR=24 1BR=140 2BR=1	Senior	TBD
Mahalia Jackson	IL002041000	PBV	282	1BR=280 2BR=2	Senior	TBD

Long Life	IL002066000	PBV	116	1BR=115 2BR=1	Senior	TBD
Vivian Gordan Harsh and Judge Green	IL002083000	PBV	278	OBR=21 1BR=255 2BR=2	Senior	TBD
Hattie Callner	IL002048000	PBV	147	OBR=30 1BR=116 2BR=1	Senior	TBD
Mary Hartwell Catherwood	IL002055000	PBV	357	OBR=11 1BR=343 2BR=3	Senior	TBD
Edith Spurlock Sampson	IL002074000	PBV	394	OBR=46 1BR=346 2BR=2	Senior	TBD
Margaret Day Blake, Maria Diaz Martinez and Elizabeth Woods	IL002072000	PBV	317	1BR=313 2BR=4	Senior	TBD
Flannery	IL002044000	PBV	252	OBR=54 1BR=196 2BR=2	Senior	TBD
Zelda Ormes	IL002049000	PBV	269	OBR=82 1BR=186 2BR=1	Senior	TBD
Wicker Park	IL002068000	PBV	225	1BR=223 2BR=2	Senior	TBD
Horner Westhaven (Superblock)*	IL002156000	PBV	201/95	1BR=30/1BR=38 2BR=54/2BR=37 3BR=99/3BR=16 4BR=10/4BR=4 5BR=8/5BR=0	Mixed-income	TBD

\* The Horner Superblock project is a proposed conversion of the 201-unit development, currently comprised of 100% public housing (ACC) units, to a mixed-income development including 95 RAD units, 50 tax credit/affordable units, and 55 market rate units. Redevelopment plans have been negotiated and memorialized pursuant to an Agreed Order between CHA, HUD and the existing residents, which details the rights and responsibilities of all parties. This development was included in CHA's RAD portfolio application as a Phase Two conversion, but since development activity is moving forward earlier than expected, the project is now being considered as a Phase One conversion.

### **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*

In FY2014, CHA updated the HCV Administrative Plan to reflect the below RAD-specific policies, as well as created a RAD lease/lease addendum and RAD grievance procedure. These RAD policies were released for public comment in November 2014 and approved by CHA's Board in January 2015.

- 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.** Other than the Horner Superblock, CHA is not currently planning to substantially rehabilitate any additional 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. For the Horner Superblock, CHA will follow the relocation process outlined in the Tenant Relocation Plan for Horner Phase I Superblock Development approved by HUD.
3. **Renewal of Lease.** Under RAD, CHA or the owner must renew all leases upon lease expiration, unless cause exists. 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, were incorporated into the HCV Administrative Plan that was released for public comment in November 2014 and approved by CHA's Board in January 2015.
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 created 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 developed a termination policy that was included in updates to the HCV Administrative Plan that were released for public comment in November 2014 and approved by CHA's Board in January 2015.
  - b. Grievance Process.** For issues related to tenancy and termination of assistance, CHA will provide an opportunity for an informal hearing. As required, CHA developed a grievance procedure that incorporates essential components of the current public housing grievance process as well as required RAD provisions. CHA's RAD grievance procedure was released for public comment in November 2014 and approved by CHA's Board in January 2015.
- 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.<sup>5</sup>
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, unless otherwise specified by court order.
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

<sup>5</sup> Applicable to projects with nine or more units.

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" 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**

Other than the Horner Superblock, 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, as required, CHA will submit an updated Accessibility and Relocation Plan Checklist, along with the Financing Plan for each property, and comply with RAD relocation and RAD Right of Return provisions. For Horner Superblock, the required relocation plan has already been submitted and approved by HUD.

## *Certification of Consistency with Consolidated Plan*

### CERTIFICATION BY STATE OR LOCAL OFFICIAL OF THE PHA PLAN CONSISTENCY WITH THE CONSOLIDATED PLAN.

The City of Chicago's Consolidated Plan is developed through a collaborative process which includes the Chicago Housing Authority and several City departments. The Chicago Housing Authority continues to actively work with the City in the planning and coordinating of the City's development efforts in order to maximize affordable housing options.

I, Rahm Emanuel, the Mayor, certify that the Annual PHA Plan of the Chicago Housing Authority is consistent with the Consolidated Plan of the City of Chicago prepared pursuant to 24 CFR Part 91.



Signed by the Appropriate State or Local Official

# 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

Signature

Patricia Emanuel

Date

October 9, 2014

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 E. Van Buren Street  
Chicago, IL 60605
  
- 2. Charles Hayes Family Investment Center (FIC)**  
4859 S. Wabash Avenue  
Chicago, IL 60615
  
- 3. HCV Regional Office**  
West Office  
2750 W. Roosevelt Road  
Chicago, IL 60608
  
- 4. HCV Regional Office**  
South Office  
10 W. 35<sup>th</sup> Street  
Chicago, IL 60616





**Rahm Emanuel**  
Mayor, City of Chicago

**Eugene Jones, Jr**  
Acting CEO, Chicago Housing Authority

**John T. Hooker**  
Chairperson

**Matthew Brewer**  
**Craig Chico**  
**Mark Cozzi**  
**Dr. Mildred Harris**  
**Harriet Johnson**  
**John G. Markowski**  
**M. Bridget Reidy**  
**Francine Washington**  
Board of Commissioners



60 E. Van Buren, Chicago, IL 60605, 312.742.8500