

PHA Plans for the Chillicothe Metropolitan Housing Authority Annual Plan for FYB 2022

Carleena Beverly, Executive Director

FYB October 1, 2022

FIRST DRAFT



Presented by:

The **Nelrod** Company

**3301 West Fwy.
Fort Worth, Texas 76107
(817) 922-9000/FAX (817) 922-9100**

Satellite Offices: Washington, D.C.; Houston, TX

E-Mail Address: info@nelrod.com

Web Site: www.nelrod.com

**Annual PHA Plan
(Standard PHAs and
Troubled PHAs)**

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

**OMB No. 2577-0226
Expires 03/31/2024**

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low-income, very low-income, and extremely low-income families.

Applicability. Form HUD-50075-ST is to be completed annually by **STANDARD PHAs** or **TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a higher performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** – A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** – A PHA that administers more the 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** – A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** – A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent
- (6) **Qualified PHA** – A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A	PHA Information.																																	
A.1	PHA Name: <u>Chillicothe Metropolitan Housing Authority</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/2022</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning above) Number of Public Housing (PH) Units: <u>387</u> Number of Housing Choice Voucher (HCVs): <u>561</u> Total Combined Units/Vouchers: <u>948</u> PHA Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission	PHA Code: <u>OH024</u>																																
<p>Availability of Information. PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>The following are the specific locations where the public may obtain copies of the 2022 Annual PHA Plan:</p> <ul style="list-style-type: none"> ▪ Administrative Office – 178 W. Fourth Street, Chillicothe, OH 45601 <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a joint PHA Plan and complete table below)</p>																																		
<table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Programs Not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead HA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>			Participating PHAs	PHA Code	Program(s) in the Consortia	Programs Not in the Consortia	No. of Units in Each Program		PH	HCV	Lead HA:																							
Participating PHAs	PHA Code	Program(s) in the Consortia					Programs Not in the Consortia	No. of Units in Each Program																										
			PH	HCV																														
Lead HA:																																		

B Plan Elements

B.1 Revision of Existing PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA?

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources.
- Rent Determination.
- Operation and Management.
- Grievance Procedures.
- Homeownership Programs.
- Community Service and Self-Sufficiency Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Asset Management.
- Substantial Deviation.
- Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

Statement of Housing Needs and Strategy for Addressing Housing Needs

Statement of Housing Needs:

Waiting List for Public Housing:

Total: 281
Extremely Low Income: 246-87.5%
Very Low Income: 22-8%
Low Income: 13-5%
Families with children: 173-62%
Elderly Families: 37-13%
Families with Disabilities: 71-25%
White: 236-84%
Black/African American: 30-11%
American Indian/Alaska Native: 1-0.36%
Hispanic: 14-5%

Bedrooms:
1 BR: 102-36%
2 BR: 93-33%

B.1

3 BR: 67-24%
4 BR: 16-6%
5 BR: 3-1%

The waiting list is not closed.

Waiting List for Section 8:

Total: 125 – Annual turnover of 54%

Extremely Low Income: 111-89%

Very Low Income: 10-8%

Low Income: 4-3%

Families with children:

Elderly Families:

Families with Disabilities:

White: 86-69%

Black/African American: 31-25%

American Indian/Alaska Native: 1-1%

Hispanic: 9-7%

Other: 7-6%

The waiting list has been closed for 16 months. The PHA does not expect to reopen the list in the PHA Plan year. When the waiting list is generally closed, the PHA does permit FUPF families onto the waiting list.

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions

Public Housing

Deconcentration and Income Mixing:

The PHA has performed its annual deconcentration and income mixing analysis to determine if the PHA has any general occupancy public housing developments covered by the deconcentration rule. The analysis results follow:

*The PHA **does/does not** have general occupancy public housing developments covered by the deconcentration rule.*

*The **following/none of the** covered developments have an average income that falls above or below the Established Income Range.*

B.1

Deconcentration Policy for Covered Developments			
Development Name:	Number of Units	Explanation (if any) [see step 4 at §903.2(c)(1)(iv)]	Deconcentration policy (if no explanation) [see step 5 at §903.2(c)(1)(v)]

Financial Resources

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2022 grants)		
a) Public Housing Operating Fund	1,353,367.00	
b) Public Housing Capital Fund	967,441.00	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance		
f) Resident Opportunity and Self-Sufficiency Grants	169,616.00	
g) Community Development Block Grant		
h) HOME		
Other Federal Grants (list below)		
2. Prior Year Federal Grants (unobligated funds only) (list below)		
3. Public Housing Dwelling Rental Income	806,497.81	
4. Other income (list below)		
Excess Utilities	10,224.70	
Non-dwelling rent	9,000.00	
Interest on investments	288.64	
Misc. charges to tenants	5,649.54	
5. Non-federal sources (list below)		
Total resources		

B.1 Operation and Management

PHA Management Structure:

Board of Commissioners
Executive Director - directs the day-to day management and operation of the Housing Authority with the assistance of the following lead staff and their line staff.

Public Housing

- Public Housing FSS Coordinator
- Property Manager (2)
- Finance *Manager*
- Housing Assistant (Part-time)
- Administrative Assistant
- Coordinator/*Modernization*
- Maintenance Technician (3)
- Maintenance Supervisor (1)
- *Maintenance Tech II (1)*

PHA changed the following:

- *Finance Director to Finance Manager*
- *Facilities Coordinator to Coordinator/Modernization*
- *Maintenance Technician from 4 to 3*

PHA deleted the following:

- *Accounting Assistant*

PHA added the following:

- *Maintenance Tech II (1)*

HUD Programs Under PHA Management:

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	387	19%
Section 8 Vouchers	561	
Section 8 Certificates	N/A	N/A
Section 8 Mod Rehab	N/A	N/A
Special Purpose Section 8 Certificates/Vouchers (list individually)		
NED	50	N/A
Family Unification Program	45	N/A
VASH	106	N/A
Other Federal Programs (list individually)	N/A	N/A

B.1 Management and Maintenance Policies:

Public Housing

The PHA Updated their Section 3 Plan.

Community Service and Self-Sufficiency Programs

Services and programs offered to residents and participants by the PHA:

Economic and Social Self-Sufficiency Programs:

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
New Horizons	<i>Varies</i>	Other	<i>Tiffin Tower</i>	Both
Bible Club	Varies	Other	Lincoln and Sherman	Both
Summer Lunch Program	Varies	Community Action	Lincoln, Sherman, Westland Estates	Both
Nutrition ED Class	Varies	Other	All Sites	Both
Community Garden Computer Labs	Varies	Other		Both
Snack-N-Learn	<i>Varies</i>	Other	Lincoln	Both
Ross Co. Library	25	Other	Tiffin Towers, Sherman Park, Worthington Manor	Both
Agape Church Soup Kitchen	Varies	Other	Sherman Park	Both

PHA deleted the Operation H.O.P.E from chart above.

Family Self-Sufficiency Programs:

Family Self Sufficiency (FSS) Participation		
Program	Required Number of Participants	Actual Number of Participants <i>(As of: 03/30/2022)</i>
Public Housing/HCV	0	87

**** As of FY 2015 total participants required are combined**

B.1

Community Service Implementation Report:

- Number of tenants required to perform community service: 5
- Number of tenants performing community service: 5
- Number of tenants granted exemptions: 461
- Number of tenants in non-compliance: 0
- Number of tenants terminated/evicted due to non-compliance: 0

(c) The PHA must submit its Deconcentration Policy of Field Office review. (See attachment oh024b01)

B.2

New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?

Y N

- Hope VI or Choice Neighborhoods.
- Mixed Finance Modernization or Development.
- Demolition and/or Disposition.
- Designated Housing for Elderly and/or Disabled Families.
- Conversion of Public Housing to Tenant-Based Assistance.
- Conversion of Public Housing to Project-Based Assistance under RAD.
- Occupancy by Over-Income Families.
- Occupancy by Police Officers.
- Non-Smoking Policies.
- Project-Based Vouchers.
- Units with Approved Vacancies for Modernization.
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA. *N/A*

B.3

Progress Report.

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.

PHA GOAL #1: EXPAND THE SUPPLY OF ASSISTED HOUSING

The PHA established the following objectives to strive in meeting goal #1:

- Apply for additional rental vouchers
- Reduce public housing vacancies

Progress Statement: *Continues to keep waiting list up-to-date, work with applicants to prepare them more rapidly for leasing, modernization of houses, apartments, and curb appeal. Meet with Maintenance department bi-weekly for updates on vacancies, leasing's and housekeeping's.*

PHA GOAL #2: IMPROVE THE QUALITY OF ASSISTED HOUSING

The PHA established the following objectives to strive in meeting goal #2:

- Improve public housing management (PHAS score)
- Improve voucher management (SEMAP score)
- Increase customer satisfaction
- Renovate or modernize public housing units

Progress Statement: *Continue improvements of units and grounds, preventive maintenance, personnel training, security cameras on properties and FSS (Family Self-Sufficiency) programs. Housekeeping and grounds inspections are continually being monitored.*

PHA GOAL #3: INCREASE ASSISTED HOUSING CHOICES

The PHA established the following objectives to strive in meeting goal #3

- Conduct outreach efforts to potential voucher landlords
- Increase voucher payment standards

Progress Statement: *CMHA participates in local landlords Scioto Valley Real Estate Association meetings to maintain a positive working relationship. Increase payment standards.*

PHA GOAL #4: PROVIDE AN IMPROVED LIVING ENVIRONMENT

The PHA established the following objectives to strive in meeting goal #4

- Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments
- Implement public housing security improvements

B.3

Progress Statement: *CMHA continues to work with community partners to help our applicants and residents get resources such as rental and utility assistance. CMHA is proactive communicating with residents through CMHA's Facebook page, website, and flyers. CMHA continues to work closely with our Security team. They provide bi-weekly reports to the HA, Security team walks the properties and interacts with residents and addresses issues in their reports. Our employees and security team also have access to live view camera footage.*

PHA GOAL #5: PROMOTE SELF-SUFFICIENCY AND ASSET DEVELOPMENT OF ASSISTED HOUSEHOLDS

The PHA established the following objectives to strive in meeting goal #5

- Engage in meaningful conversations about life dreams, aspirations and goals
- Assess and develop readiness to pursue economic self-sufficiency
- Create a plan of action that will develop skills to achieve self-sufficiency and employability
- Link and refer to supportive services that will promote economic self-sufficiency and employability

Progress Statement: *Implemented new marketing strategies to ensure all households are aware of their opportunities to participate in FSS Program which include the use of CMHA's Facebook page and website, personally contacting and following up with newly housed residents and voucher holders with personalized invitations as well as inserting flyers with all annual recertification notifications. The COVID pandemic limited our interactions due to office closures and restrictions. Currently we have opened the office and implemented CDC guidelines for screenings, briefings, and appointments. However, innovative, and creative ways were found to assess and communicate with participants to actively engage their goal setting and assist them in their endeavors as they worked and continued towards obtaining self-sufficiency.*

PHA GOAL #6: ENSURE EQUAL OPPORTUNITY AND AFFIRMATIVELY FURTHER FAIR HOUSING

The PHA established the following objectives to strive in meeting goal #6

- Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status and disability
- Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status and disability
- Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required

Progress Statement: *CMHA consistently follows Fair Housing guidelines and occasionally will receive training from Southeastern Ohio Legal Services and Ohio Regional Development Corporation when available.*

B.4	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) in EPIC and the date that it was approved.</p> <p><i>See Capital Fund 5 Year Action Plan in EPIC approved by HUD on / /</i></p>
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe: <i>N/A</i></p>
C.	<p>Other Document and/or Certification Requirements.</p>
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. <i>(See attachment oh024a01)</i></p>
C.2	<p>Certification by State or Local Officials.</p> <p><i>Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.</i></p>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p><i>Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations - Including PHA Plan Elements that Have Changed, must be submitted by the PHA as an electronic attachment to the PHA Plan.</i></p>

C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
C.5	<p>Troubled PHA.</p> <p>a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe: <i>N/A</i></p>
D.	<p>Affirmatively Furthering Fair Housing.</p>
D.1	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <p>Fair Housing Goal: Describe fair housing strategies and actions to achieve the goal:</p> <p>Fair Housing Goal: Describe fair housing strategies and actions to achieve the goal:</p> <p>Fair Housing Goal: Describe fair housing strategies and actions to achieve the goal:</p>

Attachment: oh024a01
Chillicothe Metropolitan Housing Authority
Resident Advisory Board Consultation Process and Comments – FYB 2022

1. Resident notification of appointment to the Advisory Board

At beginning of PHA Plan process, sent out letter to all residents/participants of opportunity to serve on Resident Advisory Board
Please provide date

2. Resident Advisory Board Selection

Selection made from resident/participant response **Please provide date**

3. Meeting Organization

Schedule date to meet with Resident Advisory Board for input to PHA Plan
Please provide date

Notify Resident Advisory Board of scheduled meeting **Please provide date**

Hold Resident Advisory Board meeting **Please provide date**

4. Notification of Public Hearing

Schedule date for Public Hearing and place ad **April 22, 2022**

Notify Resident Advisory Board **Please provide date**

Hold Public Hearing meeting **June 6, 2022**

5. Documentation of resident recommendations and PHA's response to recommendations

Please provide the residents' recommendations/comments and the PHA response to each comment after each RAB meeting.

Attachment: oh024b01

**Chillicothe Metropolitan Housing Authority
Deconcentration Policy**

**DE-CONCENTRATION AND INCOME TARGETING POLICY
FOR THE
CHILlicoTHE METROPOLITAN HOUSING AUTHORITY
CHILlicoTHE, OHIO**

© 2003 The Nelrod Company, Fort Worth, Texas 76109

DE-CONCENTRATION AND INCOME TARGETING POLICY
(of the Public Housing Admissions and Occupancy Policy)

Sub-Title A, Section 513 of the Quality Housing and Work Responsibility Act of 1998 (QHWRA), establishes two interrelated requirements for implementation by Public Housing Authorities: (1) Economic De-concentration of public housing developments and (2) Income Targeting to assure that families in the “extremely low” income category are proportionately represented in public housing and that pockets of poverty are reduced or eliminated. In order to implement these new requirements the PHA must promote these provisions as policies and revise their Admission and Occupancy policies and procedures to comply.

Therefore, the Chillicothe Metropolitan Housing Authority, Chillicothe, Ohio (hereinafter referred to as PHA) hereby affirms its commitment to implementation of the two requirements by adopting the following policies:

A. Economic De-concentration:

Admission and Continued Occupancy Policies are revised to include the PHA’s policy of promoting economic de-concentration. Implementation of this program may require the PHA to determine the median income of residents in each development, determine the average income of residents in all developments, compute the Established Income Range (EIR), determine developments outside the EIR, and provide adequate explanations and/or policies as needed to promote economic de-concentration.

Implementation may include one or more of the following options:

- Skipping families on the waiting list based on income;
- Establishing preferences for working families;
- Establish preferences for families in job training programs;
- Establish preferences for families in education or training programs;
- Marketing campaign geared toward targeting income groups for specific developments;
- Additional supportive services;
- Additional amenities for all units;
- Flat rents for developments and unit sizes;
- Different tenant rent percentages per development;
- Different tenant rent percentages per bedroom size;
- Saturday and evening office hours;
- Security Deposit waivers;
- Revised transfer policies;
- Site-based waiting lists;
- Mass Media advertising/Public service announcements; and
- Giveaways.

B. Income Targeting

As public housing dwelling units become available for occupancy, responsible PHA employees will offer units to applicants on the waiting list. In accordance with the Quality Housing and Work Responsibility Act of 1998, the PHA encourages occupancy of its developments by a broad range of families with incomes up to eighty percent (80%) of the median income for the jurisdiction in which the PHA operates. Depending on the availability of applicants with proper demographics, at a minimum, 40% of all new admissions to public housing **on an annual basis** may be families with incomes at or below thirty percent (30%) (extremely low-income) of the area median income. The offer of assistance will be made without discrimination because of race, color, religion, sex, national origin, age, handicap or familial status.

In order to implement the income targeting program, the following policy is adopted:

- < The PHA may select, based on date and time of application and preferences, two (2) families in the extremely low-income category and two (2) families from the lower/very low-income category alternately until the forty percent (40%) admission requirement of extremely low-income families is achieved (2 plus 2 policy).
- < After the minimum level is reached, all selections may be made based solely on date, time and preferences. Any applicants passed over as a result of implementing this 2 plus 2 policy will retain their place on the waiting list and will be offered a unit in order of their placement on the waiting list.
- < To the maximum extent possible, the offers will also be made to effect the PHA's policy of economic de-concentration.
- < The PHA reserves the option, at any time, to reduce the targeting requirement for public housing by no more than ten percent (10%), if it increases the target figure for its Section 8 program from the required level of seventy-five percent (75%) of annual new admissions to no more than eighty-five percent (85%) of its annual new admissions. (Optional for PHAs with both Section 8 and Public Housing programs)

NOTICE

Although The Nelrod Company has made its best efforts to comply with regulations, laws, and Federal/local policies The Nelrod Company does not offer advice on legal matters or render legal opinions. We recommend that this policy be reviewed by the Housing Authority's general counsel and/or attorney prior to approval by the Board of Commissioners.

The Nelrod Company is not responsible for any changes made to these policies by any party other than The Nelrod Company.

**Deconcentration and Income Mixing Worksheet and
Documentation to Complete
Deconcentration and Income Mixing PHA Plan Element**

PHA Name: _____ Date: _____

Contact: _____ Telephone #: _____

Introduction:

Beginning with FYB October 1, 2001, PHA Plans, HUD required agencies to implement the Public Housing Deconcentration and Income Mixing Final Rule. Basically, PHA's are required to take actions to deconcentrate the income mix at family developments that have an average income below 85% or higher than 115% of the average income, **or at or below 30% of Area Median Income** for all covered developments.

*Effective September 5, 2002, a new Deconcentration Final Rule revised the definition of Established Income Range (EIR) to include within the EIR those developments in which the average income level is at or below 30 percent of the area median income. 24 CFR 903.2 (c)(1)(iii). Step 3 still requires PHA's to take actions to deconcentrate the income mix at family developments as stated above, except that **the upper limit shall never be less than the income at which a family would be defined as an extremely low-income family.***

This worksheet has two purposes. First, it enables your PHA to provide Nelrod with the information needed to begin the required analysis. Second, it provides the documentation that needs to be on display.

The following are a few questions for you to answer and return.

Step I. Identify which developments are excluded by this regulation. The final rule refers to a "public housing development" which includes units or buildings with the same project number, including scattered sites. Contiguous sites with more than one project number may also be considered as one development. A development is excluded if it meets one of the requirements below.

- A. The PHA has fewer than 100 public housing units.
- B. The development houses only elderly persons, persons with disabilities or both.
- C. The PHA has only one general occupancy family development.
- D. The development has been approved for demolition or conversion to tenant-based assistance.
- E. The development is being operated in accordance with a HUD-approved mixed finance plan using HOPE VI or public housing funds awarded prior to March 7, 2001, if the PHA certifies that exemption from this regulation is needed to comply with the mixed finance plan.

Enter the name of each excluded development below and the letter corresponding to the appropriate explanation listed above:

Excluded Development	Explanation Letter(s) Above
1.	
2.	
3.	
4.	
5.	

If your agency has a development that does not meet any of the above criteria for exemption, mark the question below "Yes." If all of your agency's developments are exempt mark the question below "No."

Yes **No** **Does the PHA have any general occupancy (family) public housing development covered by the deconcentration rule? If no, this section is complete. If yes, continue to the next question.**

Step II. Covered Developments

- A. Developments that are not excluded are called "covered developments." List these developments in the table in D below.
- B. Determine the average income for all covered developments and enter: \$_____
- C. Determine the average income for each covered development and enter in the table in D below.
- D. Below list each covered development, and the average income for each covered development.

Covered Development Name	Total # Units	Total # Occupied	Average Income
AMP 1	129		
AMP 2	49		
AMP 3	95		
AMP 4	111		

Please email (denise@nelrod.com) or fax this completed form to **Denise Avalos at 817-922-9100**. For more information, call Denise at 817-922-9000, extension 132.