



**ANN ARBOR HOUSING COMMISSION**

**5-Year Plan FY 15 – FY 19  
including  
July 1, 2015 – June 30, 2016  
One Year Annual Plan  
FINAL**

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Certification of Payments to Influence Federal Transactions

**Form SF-LLL**

Disclosure of Lobbying Activities

<b>PHA 5-Year and Annual Plan</b>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Form 50075
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**Section 1.0: PHA Information**

PHA Name: Ann Arbor Housing Commission  
 PHA Code: MI-064  
 PHA Type:  Small  High Performing  Standard  HCV (Section 8)  
 PHA Fiscal Year Beginning: (MM/YYYY): 07/2015

**Section 2.0: Inventory** (based on ACC units at time of FY beginning in 1.0 above)

Number of PH units: 105 Number of HCV units: 1333 HCV + 217 VASH + 236 RAD PBV

**Section 3.0: Submission Type**

5-Year and Annual Plan  Annual Plan Only  5-Year Plan Only

**Section 4.0: PHA Consortia (NOT APPLICABLE)**

**Section 5.0: 5-Year Plan.** Complete items 5.1 and 5.2 only at 5-Year Plan update.

**Section 5.1: Mission.**

State the PHA’s Mission for serving the needs of low-income, very low-income, and extremely low income families in the PHA’s jurisdiction for the next five years:

*The Ann Arbor Housing Commission (AAHC) seeks to provide desirable housing and related supportive services primarily for extremely low- income to very low-income individuals and families on a transitional and/or permanent basis. AAHC partners with community supportive service providers to build healthy residential communities and promote an atmosphere of pride and responsibility.*

**Section 5.2: Goals and Objectives.**

Identify the PHA’s quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

*FY 15 – FY 19*

- 1) *Complete Redevelopment of all public housing units to Project Based Vouchers through the Rental Assistance Demonstration (RAD) project*
- 2) *Develop new affordable housing*
  - a. *At existing public housing sites*

- b. *New properties*
- 3) *Increase the number of Project-Based Vouchers in the City of Ann Arbor and other communities in Washtenaw County that have a strong economic base and public transportation.*
  - a. *Issue a Request for Proposal for to project-base up to 20% of the AAHC’s budget authority in order to de-concentrate poverty and expanding housing and economic opportunities for very low-income and special needs households in the City of Ann Arbor. It is projected that about 200 vouchers will be converted to project-based vouchers.*
- 4) *Increase supportive housing for residents with complex needs spanning from homelessness, mental illness, substance use disorders, and/or other physical/mental disabilities.*
  - a. *Increase support services for tenants in affordable housing and voucher program*
    - b. *Through community partnerships*
    - c. *Additional funding sources*

**Section 6.0 (a) Revisions** Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission:

When applicable, the relevant Chapter of the Public Housing Admissions and Continued Occupancy Policy (ACOP) or Section 8 Administrative Plan is referenced. This document is intended to provide information related to changes among the PHA Plan Elements that have occurred during the current FY14-15 or which are anticipated to occur in the coming FY15-16.

The Section 8 program and Housing Choice Voucher program are used interchangeably in this document. See Admissions and Continued Occupancy Policy (ACOP) and Administrative Policy on the AAHC website at [www.a2gov.org/housingcommission](http://www.a2gov.org/housingcommission) or at the Miller, Baker or Ashley Office to review the full policy

**A. Public Housing Admissions and Continued Occupancy Policy Changes that occurred in FY14**

**CHAPTER 16 – PROGRAM ADMINISTRATION**

***Section 16 II: Flat Rents & Ceiling Rents***

*HUD requires that no later than June 2014, PHAs must establish flat rents at no less than 80 percent of HUD’s fair market rent (FMR) for the PHA’s jurisdiction.*

- *Ceiling rents must be adjusted to the same level as flat rents.*
- *If the new flat rent amount will increase a family's rent payment by more than 35 percent, an exception will allow for the new flat rent amount to be phased in to ensure the family rent payment will not increase more than 35 percent annually.*
- *The AAHC is setting the flat rent at 80% of the FMR, which does not increase any families current flat rent more than 35%*
- *The AAHC is setting the ceiling rent at 80% of FMR*
- *The Flat rents will be adjusted for reasonable utilities*

*The following example, illustrates how the new flat rent would be calculated and phased in:*

	FMR	80% of FMR	Current Flat Rent
1 BR	803	642	548 -578
2 BR	952	762	650-707
3 BR	1301	1041	841-965
4 BR	1686	1349	1016-1047
5 BR	1939	1551	1169-1205

## **B. Housing Choice Vouchers Administrative Policy Changes that occurred in FY 14**

### **CHAPTER 3 – ELIGIBILITY**

#### ***3-III.E REASONABLE ACCOMMODATION***

##### *PHA Policy*

*Participation in services with treatment providers or community-based organizations providing services to household members in order to address the activity that would otherwise cause the denial of assistance in order to prevent that activity in the future.*

### **CHAPTER 5 – BRIEFINGS AND VOUCHER ISSUANCE**

#### ***5-II.B OCCUPANCY STANDARDS***

##### *PHA Policy:*

*The PHA will assign one bedroom for each two persons within the household, except in the following circumstances:*

- *Live-in aides will be allocated a separate bedroom.*
- *Single person families will be allocated a one bedroom voucher.*

The PHA will reference the following chart in determining the appropriate voucher size for a family:

<i>Voucher Size</i>	<i>Persons in Household (Min – Max)</i>
<i>1 Bedroom</i>	<i>1-2</i>
<i>2 Bedrooms</i>	<i>2-4</i>
<i>3 Bedrooms</i>	<i>3-6</i>
<i>4 Bedrooms</i>	<i>4-8</i>
<i>5 Bedrooms</i>	<i>6-10</i>

## **CHAPTER 6 – INCOME AND SUBSIDY DETERMINATIONS**

### **6-III.B. FINANCIAL HARDSHIPS AFFECTING MINIMUM RENT**

#### PHA Policy

Financial hardship includes the following situations:

(5) *The family is homeless at the time they are approved for a voucher*

### **6-III.D Utility Allowances**

#### PHA Policy

*The utility allowance for a family is the lower of the utility allowance amount for the family unit size or the utility allowance amount for the size of the unit rented by the family. At the request of a family with a person with disabilities, the PHA must approve a utility allowance higher than the applicable amount if such a higher utility allowance is needed as a reasonable accommodation. This change applies to vouchers issued after July 1, 2014 and to current program participants.*

## **CHAPTER 15: SPECIAL HOUSING TYPES**

### **15-VII. HOMEOWNERSHIP**

#### **15-VII.B. FAMILY ELIGIBILITY:**

##### PHA Policy

*A family is prohibited from participating in Homeownership if defaulted on a mortgage while participating in the HCV HO program.*

#### **15-VII.I. CONTINUED ASSISTANCE REQUIREMENTS FAMILY OBLIGATIONS:**

PHA Policy

- a. A family is prohibited from continuous HO assistance if they have vacated the unit without prior notice to the PHA.
- b. The PHA will process interim recertification for changes in a family income or family composition.
- c. The PHA requires a continuous work requirement of at least 30 hrs per week at the federal minimum wage for all HO participants, excluding elderly and disabled families.
- d. The PHA determined a written policy to account for mitigating circumstances applicable to HO participants where a lapse in employment prohibits the family from meeting the continuous work requirements.

**15-VII.K. HOMEOWNERSHIP ASSISTANCE PAYMENTS AND HOMEOWNERSHIP EXPENSES:**

PHA Policy

- a. The HAP automatically terminates after 180 days of the last HAP; however a family may be reinstated if the family experiences an extreme hardship as defined by the PHA.
- b. The payment standard shall not drop below the initial payment standard dollar amount due to changes by HUD or due to changes in the family composition.

**15-VII.O. RECAPTURE:**

PHA Policy

The PHA will not recapture the Homeownership Voucher payments unless there was an act of fraud or misrepresentation.

**CHAPTER 16: PROGRAM ADMINISTRATION**

**16-II.B. PAYMENT STANDARDS**

PHA Policy

The PHA will review the appropriateness of the payment standards on an annual basis when the new FMR is published, and at other times as determined necessary.

During the fiscal year, the Board adopted a payment standard of 110% of FMR for the City of Ann Arbor and 100% of FMR for the rest of Washtenaw County, Western Wayne, and Monroe Counties. The Board also approved increasing the payment standard in the City of Ann Arbor to 120% of FMR if HUD adopts its proposed rule to allow that to happen without prior HUD approval.

**CHAPTER 17: PROJECT BASED VOUCHERS**

**17-II.F. CAP ON NUMBER OF PBV UNITS IN EACH PROJECT**



PHA Policy

*The PHA will provide PBV assistance for excepted units.*

PHA Policy

*The owner will either provide supportive services or refer tenants to supportive services provided in the community. The supportive service requirement will be monitored at a minimum annually during the annual income recertification process. The owner may also refer tenants to specific supportive services as needed. Supportive services can include but are not limited to:*

*Supportive services can include but are not limited to:*

*Family Self Sufficiency Program*

*Payee Services*

*Financial Literacy/Credit Counseling*

*Employment/Job Skills*

*Anger Management/Conflict Resolution*

*Mental Health Support*

*Medical Care*

*Substance Abuse Recovery Support*

*Domestic Violence*

*Parenting and Child Welfare*

*Education and Employment Support*

*Coordination of Entitlements*

*Money Management and Financial Literacy*

*Assistance with Basic Needs*

*Legal Services*

*Child Care*

*Transportation*

*Security*

*Household Maintenance and Activities of Daily Living*

*Connections to Mainstream Services and Community Resources*

*Tenancy Problems and Lease Violations*

*Guest Monitoring Support*

*Eviction Prevention*

**CHAPTER 18: FAMILY SELF SUFFICIENCY**

***18-II.C. FSS FAMILY SELECTION PROCEDURES:***

PHA Policy

*Family must meet the following eligibility criteria: 1) must not have previously graduated from FSS. 2) Participation is limited to two attempts. 3) Enrollment is limited to once per year. 4) The PHA has sole discretion to reconsider the family's eligibility.*

### **18-III. C. CONTRACT OF PARTICIPATION:**

#### PHA Policy

*a. Contract of Participation: Every participant must execute a contract of participation; only the head of household may sign the CofP in addition, the HOH must complete all obligations.*

*b. Individual Training and Services Plan (Plan): outlines the HUD mandatory requirements as stated in the CofP; including the PHA defined sufficient employment requirement, quarterly meetings for unemployed participants, and establishment of a checking/savings account.*

*c. Employment Obligation: HUD allows the PHA to define suitable employment including a definition of continuous employment, elderly/disabled clauses, and a definition of selfemployment, see FSS Ch for full description.*

*d. Disability and FSS Graduation: FSS participants who enter the program disabled must meet all program requirements to graduate. Suitable employment level may be lowered due to disability.*

*e. Contract Term: establishes the procedures the PHA must follow for participant enrollment in compliance with HUD regulation.*

*f. Contract Extension: establishes the criteria participants must meet to qualify for contract extensions, see FSS chapter for full definition.*

*g. Completion of the Contract: defines the criteria a participant must meet for graduation as defined in the contract of participation and individual training and service plan, see FSS chapter for full definition.*

### **C. Proposed Policy Changes for FY 15/16**

The following summary from Nan McKay explains HUD's proposed streamlining policies for public housing and the voucher program. The AAHC will consider each one of them and determine whether to adopt them once HUD publishes a final rule.

HUD published in the *Federal Register* a [proposed rule](#) aimed at streamlining administrative regulations for the public housing (PH), housing choice voucher (HCV), and [multifamily](#) housing programs. The rule combines changes in the 2014 appropriations act, elements of HUD's 2013 temporary compliance options, and other streamlining changes. Comments are due by **March 9**.

#### **2014 Appropriations Act Changes**

HUD has issued interim guidance on the appropriations act changes in [Notice PIH 2014-12](#) and in a [Federal Register notice](#) published on June 25, 2014.

Today's notice opens the formal rulemaking process for regulatory changes in the determination of PH flat rents, HCV utility allowances and biennial

inspections, and the definition of *extremely low income*. HUD plans to publish a separate notice on the act's provision for PHA consortia.

### **Temporary Compliance Assistance**

The proposed rule would give PHAs the option to permanently adopt one or more of the streamlining strategies first offered in [Notice PIH 2013-03](#) (and later extended by [Notice PIH 2013-26](#)). The options applicable to both the PH and HCV programs include:

1. Use of actual past income for rent calculations
2. Family self-certification of assets when total assets do not exceed \$5,000 in value
3. Streamlined annual reexaminations for elderly and disabled families with fixed incomes - (Cannot select this option if selection option 1)
4. The proposed rule would also make permanent the PHA option of approving [exception payment standards](#) in the HCV program. PHAs could approve exceptions between 111 percent and 120 percent of fair market rent ([FMR](#)), bypassing the field office approval process.

### **Additional Streamlining Measures**

The HUD notice also contains a number of proposed regulatory changes intended to reduce program costs and/or administrative burdens. The changes applicable to the PH, HCV, and multifamily programs include:

1. Revision of the rule on documentation of social security numbers (SSNs). The proposed rule would permit PHAs to defer documentation for children less than 6 years of age in applicant families for up to 90 days after admission, in cases where the child does not yet have an SSN.

*Proposed changes applicable to the PH and HCV programs include:*

1. A provision for issuing utility reimbursement payments quarterly, rather than monthly, when the quarterly total does not exceed \$20.
2. Revisions to the regulations governing the earned income disallowance (EID). The proposed rule would limit EID eligibility to 24 consecutive months, eliminating the need for tracking the exclusion over a period of up to 48 months. The rule would retain the current 12-month full exclusion period, and would then offer PHAs the flexibility to phase in a rent increase by excluding at least 50 percent of increased income for an additional 12 months, for family members who remain continuously employed. Note: the current EID rules would remain in effect for participants assisted under the Housing Opportunities for Persons with AIDS ([HOPWA](#)) program.

*The notice also proposes the following changes applicable to only the PH program:*

1. Substitution of flat rent for “public housing maximum rent” in the calculation of prorated rent for mixed families. The rule would also correct a calculation anomaly that causes prorated rent to decrease when a mixed family’s income exceeds the maximum rent amount.
2. The option of accepting resident self-certification of compliance with community service requirements.
3. Streamlining and simplification of grievance procedures.
4. A clarification that the number of vacant units eligible for operating subsidy is limited to 3 percent of total units, on a project-by-project basis.

*Finally, the proposed rule includes the following changes applicable to the HCV program:*

1. Exclusion of mandatory fees from student financial aid, where applicable. While this change is categorized as applicable to all programs, student financial aid is currently excluded from annual income in the PH program.
2. The option to charge reinspection fees to owners, when the owner reports that an HQS violation has been corrected but inspection reveals that the violation still exists. The optional reasonable fee could be charged to owners, but not to program applicants or participants.
3. Revision of the regulations governing utility allowance schedules. The proposed rule would permit PHAs to classify units as “attached” or “detached,” reducing the number of unit types for which allowances must be calculated.

*In addition, the following changes are under consideration:*

1. Request an exception from HUD to allow more than 20% of housing choice voucher to be converted to project-based vouchers – strictly in high-income areas to de-concentrate poverty.
2. Combine the public housing waitlist with the voucher waitlist once there are no longer any public housing units.
3. Remove Western Wayne County from the AAHC voucher service area
4. Increase minimum requirements to participate in the Homeownership and Family Self Sufficiency program.
5. Remove the requirement to deny an application from a household who has a member who has been evicted from federally assisted housing in last 5 years for a drug-related criminal activity. The AAHC requires that household member to be removed from the application. HUD allows the AAHC to admit that household member if they have completed an approved drug rehabilitation program for a drug-related activity that occurred in last 3 years.
6. Remove the requirement to deny an application from a household that has been evicted from federally subsidized housing in the last 3 years.

*And finally, the following changes to the Project-based voucher proposal process:*

1. The PHA will advertise its request for proposals (RFP) for proposals selected under another competition, existing, rehabilitated and newly constructed housing in local newspapers that are either on-line or newsprint.
2. The PHA will publish its advertisement in the newspaper for at least one day per week for two consecutive weeks. The advertisement will specify the number of units the PHA estimates that it will be able to assist under the funding the PHA is making available. Proposals will be due in the PHA office no sooner than by close of business 30 calendar days from the date of the last publication.

### **Section 6.0 (b) Plan Locations**

Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions.

406 N. Ashley St– AAHC administrative offices  
727 Miller Ave – AAHC administrative offices  
106 Packard Rd – AAHC administrative offices  
100 N. Fifth Ave – City Clerk’s Office City Hall  
Resident Councils at Baker Commons, Hikone, Green-Baxter Court  
AAHC website <http://www.a2gov.org/housingcommission/>

### **Section 6.0 Plan Elements**

**The AAHC’s ACOP and Administrative Plan are over 500 pages long and are available on the AAHC website at <http://www.a2gov.org/housingcommission/>. Consequently the Plan Elements below are summaries of policies.**

#### **1) ELIGIBILITY, SELECTION AND ADMISSIONS POLICIES, INCLUDING DECONCENTRATION AND WAIT LIST PROCEDURES.**

##### **ACOP**

- *Household income limited to 80% of Area Median Income (AMI)*
- *40% of the households in public housing must have incomes below 30% of AMI.*
- *One member of household must be citizen, national or eligible non-citizen*
- *Denial if evicted from federally assisted housing in last 3 years*
- *Denial if on federal life-time sex offender list*
- *Denial if previously manufactured methamphetamine in federally assisted housing*
- *Can be denied for currently using illegal drugs or other criminal activity based on household circumstances*
- *Household screening includes history of rent payments and other tenancy history*
- *Will consider requests for reasonable accommodation*

- *All of the AAHC public housing units are in the city of Ann Arbor which is a high-income community compared to the rest of the county and state of Michigan*
- *The waitlist will periodically be opened as needed but it is currently closed*
- *There is a separate homeless waitlist to house homeless households who are referred through the county homeless assessment and intake process and who have a supportive service provider*
- *Eligibility will be determined after the family is pulled from the waitlist*
- *There is a preference for households living or working in Washtenaw County*
- *No units are designated elderly or disabled*
- *There are no separate site-based waitlists*
- *The waitlist will be updated periodically by notifying households on the waitlist to determine if the household continues to be eligible and interested*
- *Households will be pulled from the waitlist based on preference, accessibility needs, and unit size available.*
- *Households will be notified by first class mail if they are selected from the waitlist*

**ADMINISTRATIVE PLAN (VOUCHERS)**

- *Household income limited to 80% of Area Median Income (AMI)*
- *75% of the households must have incomes below 30% of AMI.*
- *One member of household must be citizen, national or eligible non-citizen*
- *Denial if evicted from federally assisted housing in last 3 years*
- *Denial if on federal life-time sex offender list*
- *Can be denied for currently using illegal drugs or other criminal activity based on household circumstances*
- *Will consider requests for reasonable accommodation*
- *The service area includes Washtenaw County, Western Wayne County and Monroe County*
  - *The AAHC is considering removing Western Wayne and Monroe County from the service area*
- *The waitlist will periodically be opened as needed but it is currently closed*
- *There is a separate homeless waitlist to house homeless households who are referred through the county homeless assessment and intake process and who have a supportive service provider*
- *Eligibility will be determined after the family is pulled from the waitlist*
- *New admissions of medical marijuana users are prohibited from entering program*

**2) FINANCIAL RESOURCES.**

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources-as indicated</b>	<b>Planned (Est.)</b>	<b>Planned Uses</b>
<b>Federal Sources:</b>		
Public Housing Operating Funds-based on FY2013 Actual	\$300,000	PH Operations

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources-as indicated</b>	<b>Planned (Est.)</b>	<b>Planned Uses</b>
Public Housing Rental Income-based on FY2013 Actual	\$240,000	PH Operations
Public Housing Capital Fund CFP501-10-Actual Grant	\$555,590	Capital Expenditures
Public Housing Capital Fund CFP501-11 Actual Grant	\$486,874	Capital Expenditures
Public Housing Capital Fund CFP501-12 Available Grant	\$203,000	RAD Conversion
Public Housing Capital Fund CFP501-13 Available Grant	\$380,000	RAD Conversion
Public Housing Capital Fund CFP501-14 Available Grant	\$476,920	RAD Conversion
Public Housing Capital Fund CFP501-14 Estimated Grant	\$152,244	RAD Conversion
Housing Choice Voucher/S8 HAP Grant	\$9,500,000	HAP Expenses
Housing Choice Voucher/S8 Admin Fees Based on CY2013 Actual	\$922,000	S8/HCV Admin Expenses
VASH HAP Grant-Based on CY2013 Actual	\$25,000	VASH HAP Expenses
Continuum of Care Based on FY2015 Actual	\$5,105,523	Continuum of Care housing and services for homeless
Family Self Sufficiency	\$103,500	Family Self Sufficiency program
Management Fees generated by COCC	\$310,000	Central Office Expenses
Other (Interest Income, Fraud Recovery)	\$65,000	Restricted
<b>Non-federal sources (list below)</b>		
City of Ann Arbor General Fund	\$265,000	Operations and Services
Other Housing Operating Subsidy	\$580,000	Housing Operations
Other Housing Tenant Income	\$800,000	Housing Operations
<b>Total resources</b>	<b>\$20,437,407</b>	

### 3) RENT DETERMINATION.

#### ACOP

- Household rent and utilities is based on 30% of the household's annual adjusted income
- The minimum rent is \$50/month

- *A household may request and qualify for a poverty exemption to the minimum rent*
- *Flat rents are set at 80% of Fair Market Rents, adjusted for utilities if applicable*
- *The ceiling rent is the same as flat rents*

**ADMINISTRATIVE PLAN**

- *Household rent and utilities is based on 30% of the household’s anticipated annual adjusted income*
- *The minimum rent is \$50/month*
- *A household may request and qualify for a poverty exemption to the minimum rent*

**4) OPERATION AND MANAGEMENT.**

<b>Program Name</b>	<b>Units or Families Served</b>
Public Housing	101
Other Housing	252
Housing Choice Vouchers	1,333
Special Purpose Section 8 Vouchers	
-Mainstream/Non-Elderly Disabled	100*
-Project Based Vouchers/Pear St	20*
-VASH (Veterans Affairs Supportive Housing)	212
*included in 1,333 HCV figure	
- Shelter Plus Care (Administrator)	400+

*The AAHC owns and manages 360 housing units. 106 units are public housing and 252 units are affordable units converted under the RAD program or other affordable housing.*

*The AAHC has a Facility and Maintenance Manager and 4 Maintenance Workers. The AAHC has an adopted Maintenance policy summarized below:*

- *24-hour emergency work order line and response*
- *Response to urgent requests within 2 business days*
- *Response to routine work orders within 5 days and repair within 30 days*
- *Preventative maintenance schedule*
- *All units inspected at least once annually*
- *Turn vacant units within 2-10 days*
- *All work orders are tracked in Yardi*
- *Pest Control contract includes preventative maintenance and response to call-outs*
- *Residents can be charged if unit damage was caused by the tenant*

**5) GRIEVANCE PROCEDURES.**

**ACOP**

- *Informal hearings for applicants who have been denied housing*
  - *Conducted by someone other than person who made decision*



- *Formal grievance hearing for terminations*
  - *Conducted by a grievance officer*
- *Complete a grievance request form from any AAHC office*
- *Because Michigan is a due process state, a grievance hearing is not required and will not be provided for evictions based on criminal activity that threatens the life and health of other residents, drug related activities and felony activities*

#### **ADMINISTRATIVE PLAN**

- *Informal reviews for applicants who have been denied admittance into the program*
- *Informal hearing for terminations*
  - *Conducted by a grievance officer*
- *Complete a grievance request form from any AAHC office*

#### **6) DESIGNATED HOUSING FOR ELDERLY AND DISABLED FAMILIES.**

- *The AAHC does not have any public housing units designated exclusively for the elderly or disabled*

#### **7) COMMUNITY SERVICE AND SELF-SUFFICIENCY.**

- *Family Self Sufficiency Program managed by AAHC*
- *Section 3 hiring of tenants for a range of activities*
- *On-site contracted support provided to residents at Hikone and Green-Baxter by Community Action Network*
- *On-site contracted support provided to residents at North Maple Estates and Maple Meadows by Peace Neighborhood Center*
- *On-site contracted support provided to residents at Baker, White/State/Henry, West Washington, Seventh, and Broadway by Community Support and Treatment Services*
- *Community Services requirement may be met from for-profit, non-profit and court ordered locations.*
- *Homeownership program as part of Voucher program*

#### **8) SAFETY AND CRIME PREVENTION.**

- *The AAHC has hired a security guard company to make random non-business hour security checks at most public housing properties*
- *Security cameras are installed at Miller Manor, Baker Commons, and Maple Meadows and cameras will be added at Hikone during renovations*
- *The Ann Arbor Police Department works cooperatively with the AAHC and provides monthly police reports to property managers to follow-up on*
- *Additional lighting added to several sites to increase visibility*

#### **9) PETS.**

- *Assistance animals are allowed if member of household is disabled and accommodation is requested*
- *Pets must be registered with AAHC*
- *Common pets not exotic pets*
- *Weight must not exceed 25 pounds*
- *Can have 1 pet, or 2 pets if 1 is aquatic*

## **10) CIVIL RIGHTS CERTIFICATION.**

*The AAHC examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction.*

## **11) FISCAL YEAR AUDIT.**

*The FY 13/14 audit ending June 30, 2014 had no findings*

## **12) ASSET MANAGEMENT.**

*The AAHC tracks its revenues and expenditures by property including inventory. The long-term plan is to convert all public housing units under the RAD program to project-based vouchers to reinvest in the capital needs of those properties.*

## **13) VIOLENCE AGAINST WOMEN ACT (VAWA).**

### **ACOP & ADMINISTRATIVE POLICY**

*The AAHC does not provide any additional services to prevent domestic violence or assist victims of domestic violence. The AAHC does have a homeless waitlist that includes victims of domestic violence.*

## **Section 7 Programs**

Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. *Include statements related to these programs as applicable.*

### **A. RENTAL ASSISTANCE DEMONSTRATION (RAD) PROJECT**

*The Ann Arbor Housing Commission (AAHC) is amending its annual PHA Plan because it was a successful applicant in the Rental Assistance Demonstration (RAD). As a result, the AAHC will be converting to Project Based Vouchers under the guidelines of PIH Notice 2012-32, REV-1 and any successor Notices. Upon conversion to Project Based Vouchers the Commission will*

*adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6.C & 1.6.D of PIH Notice 2012-32, REV-1 as outlined below. Additionally, the AAHC is currently compliant with all fair housing and civil rights requirements and is not under a Voluntary Compliance Agreement.*

*RAD was designed by HUD to assist in addressing the capital needs of public housing by providing AAHC with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Commission's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that AAHC may also borrow funds to address their capital needs. The AAHC will also be contributing Operating Reserves in the approximate amount of \$300,000 and Capital Funds in the approximate amount of \$800,000 towards the conversion.*

*AAHC has applied for and been awarded authority to convert all of its public housing properties under the RAD program. The following chart displays the RAD conversion plan for AAHC's entire public housing portfolio.*

<b>RAD Project</b>	<b>Public Housing Property Name</b>	<b>Property Type</b>	<b>Current Public Housing Units</b>	<b>Proposed Total Units</b>	<b>Proposed RAD Units</b>	<b>Proposed Non-RAD Units</b>	<b>Net Change (from Public Housing to RAD)</b>
Phase 1	S. Seventh	Family	8	8	8	-	-
	Hillside	Family	6	6	6	-	-
	Mallet's Creek	Family	6	6	6	-	-
	Upper Platt	Family	5	5	5	-	-
Phase 2	S. Maple	Family	29	29	29	-	-
	Miller	Family	103	106	91	15	(12)
Phase 3	N. Maple Estates	Family	19	42	27	15	8
	N. Maple Duplexes	Family	4	4	4	-	-
Phase 4	Broadway	Family	20	16	0	16	(20)
	Lower Platt	Family	4	32	20	12	16
	White/State/Henry	Family	28	32	24	8	(4+)
	Oakwood	Family	3	3	-	3	(3)
	W. Washington	Family	2	2	0	-	(2)
Scattered Sites	Green Baxter	Family	23	23	23	-	-
	Baker	Family	64	64	64	-	-
	Hikone	Family	29	29	29	-	-
De Minimis Disposition	Evelyn Court	Family	1	-	-	-	(1)
<b>Total Units</b>			<b>354</b>	<b>407</b>	<b>336</b>	<b>71</b>	<b>(18)</b>

*The conversion of public housing units under RAD to Section 8 units, either under the project-based voucher (PBV) Section 8 program will shift the converted units into a different regulatory program. As a result, the RAD converted units will no longer be subject to public housing portions of our agency’s annual plans. They will, however, become subject to the rules of the applicable Section 8 program, as modified by a few rules specific to RAD converted units. These specific RAD-related rules are intended to apply a few important provisions of the public housing rules to the RAD converted units, even though they would not normally be applicable in the Section 8 context.*

*The following five transactions have been approved for a RAD conversion by HUD, subject to compliance with the requirements of the RAD notice, including the resident consultation requirements.*

**Phase 1 – South Seventh, Hillside, Mallet’s Creek, Upper Platt – Family Developments**

Under the RAD conversion of the Phase I properties, 25 of the current public housing units will be converted to RAD Section 8 units. There will be no change in the bedroom distribution of units and there will be no change in the type of units. The current and post conversion unit information is:

<u>Unit Type</u>	<u>Number of Bedrooms</u>	<u>Current PH Units</u>	<u>Proposed RAD Units</u>	<u>Proposed Non-RAD Units</u>
Family	1 BR	9	9	0
Family	2 BR	2	2	0
Family	3 BR	13	13	0
Family	4 BR	1	1	0
Family	5 BR	0	0	0
<b>Total</b>		<b>25</b>	<b>25</b>	<b>0</b>

**Phase 2 – South Maple, Miller Properties – Family Developments**

Under the RAD conversion of the Phase 2-properties, three new units will be created, 120 of the current public housing units will be converted to RAD Section 8 units, and 15 units will be converted to non-RAD project-based VASH units. The conversion will result in a de minimis reduction of (12) units, the addition of 3 units and replacement of 7 units at North Maple Estates. The current and post conversion unit information is:

<u>Unit Type</u>	<u>Number of Bedrooms</u>	<u>Current PH Units</u>	<u>Proposed RAD Units</u>	<u>Proposed Non-RAD Units</u>
Family	1 BR	98	91	15
Family	2 BR	5	5	0
Family	2 BR	10	10	0
Family	3 BR	14	14	0
Family	4 BR	5	5	0
<b>Total</b>		<b>132</b>	<b>120</b>	<b>15</b>

**Phase 3 – North Maple Estates, North Maple Duplexes - Family Developments**

Under the RAD conversion of the Phase 3-properties, 19 current public housing units will be demolished and 42 units will be newly constructed and 4 units will be rehabilitated. The new development will consist of 31 RAD Section 8 units and 15 non-RAD affordable units. The conversion will result in 8 additional RAD units. The current and post conversion unit information is:

<u>Unit Type</u>	<u>Number of Bedrooms</u>	<u>Current PH Units</u>	<u>Proposed RAD Units</u>	<u>Proposed Non-RAD Units</u>
Family	1 BR	0	8	0
Family	2 BR	0	2	2
Family	3 BR	4	4	8
Family	4 BR	10	10	2
Family	5 BR	9	7	3
<b>Total</b>		<b>23</b>	<b>31</b>	<b>15</b>

**Phase 4 – Broadway, White/State/Henry, Lower Platt, Oakwood Properties, W. Washington Properties, Evelyn Family Developments**

Under the RAD conversion of the Phase 3-properties, 53 current public housing units will be demolished or substantially rehabbed for a total of 37 units. The new development at White/State/Henry will consist of 24 RAD Section 8 units and 8 affordable units. At Lower Platt, 4 current public housing units will be demolished and 32 units will be newly constructed. The new development will consist of 22 RAD Section 8 units and 10 non-RAD affordable units. The three (3) units at Oakwood will be converted to non-RAD affordable units through a de minimis reduction. The RAD subsidy for the two units at W. Washington will be transferred to White/State/Henry but will continue to operate as affordable housing. The Broadway site will be demolished and if it is feasible to rebuild on the site, it will be rebuilt with an estimated 16 units. The Broadway units will be transferred to the N. Maple, Lower Platt and White/State/Henry new construction projects. The current and post conversion unit information is:

<u>Unit Type</u>	<u>Number of Bedrooms</u>	<u>Current PH Units</u>	<u>Proposed RAD Units</u>	<u>Proposed Non-RAD Units</u>
Family	1 BR	36	28	20
Family	2 BR	14	12	10
Family	3 BR	1	0	6
Family	4 BR	0	0	2
Family	5 BR	7	4	3
<b>Total</b>		<b>58</b>	<b>44</b>	<b>41</b>

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**Scattered Sites (East) – Green Baxter, Baker, Hikone Properties, Family Developments**

Under the RAD conversion of the Scattered Site (East) properties, there will be no change in the number of units; there will be no change in the bedroom distribution of units and there will be no change in the type of units. The current and post conversion unit information is:

<u>Unit Type</u>	<u>Number of Bedrooms</u>	<u>Current PH Units</u>	<u>Proposed RAD Units</u>	<u>Proposed Non-RAD Units</u>
Family	1 BR	16	16	16
Family	2 BR	12	12	12
Family	3 BR	4	4	4
Family	4 BR	10	10	10
Family	5 BR	11	11	11
Total		116	116	116

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

*Any public housing units converting to assistance under long-term project based vouchers shall be subject to the program rules applicable to project based vouchers as of the effective date of conversion and shall no longer be subject to the program rules applicable to public housing. They shall be subject to the regulatory and statutory requirements of the RAD PBV program as set forth in the following:*

- *Section 1.6 of HUD Notice PIH-2012-32 (HA), Subject: Rental Assistance Demonstration – Final Implementation, Issued July 26, 2012 which sets forth alternative requirements imposed upon RAD PBV units, and*
- *All other regulatory and statutory requirements of the PBV program in 24 CFR Part 983 and Section 8(o)(13) of the United States Housing Act of 1937.*

*Any public housing units converting to assistance under long-term project based rental assistance shall be subject to the program rules applicable to project based rental assistance as of the effective date of conversion and shall no longer be subject to the program rules applicable to public housing. They shall be subject to the regulatory and statutory requirements of the RAD PBRA program as set forth in the following:*

- *Section 1.7 of HUD Notice PIH-2012-32 (HA), Subject: Rental Assistance Demonstration – Final Implementation, Issued July 26, 2012 which sets forth alternative requirements imposed upon RAD PBRA units, and*

- All other regulatory and statutory requirements of the PBRA program in 24 CFR Part 880.

*In general, the properties converted under RAD will be operated consistent with the Agency's project based voucher program rules to the extent not specifically required to operate in a different manner by the applicable regulations and notices referenced above.*

*The following table lists out each of the provisions affecting residents' rights and participation, waiting list and grievance procedures for both PBV and PBRA.*

<b>Project Based Voucher (PBV) Requirements (Section 1.6.C of PIH Notice 2012-32)</b>
1. No re-screening of tenants upon conversion;
2. Resident right to return if relocated as a result of conversion;
3. Phase-in of tenant rent increase:  If the rent increase is the greater of 10% or \$25, the increase will be phased in over 3 years or up to five years, as determined by the PHA;
4. Continued eligibility for PH-FSS and ROSS-SC programs;
5. Resident Participation and Funding.  Residents will have the right to establish and operate a resident organization and be eligible for resident participation funding. See Attachment 1B of PIH Notice 2012-032.
6. Termination notification:  PHA must provide written notification of lease termination within a reasonable time: <ul style="list-style-type: none"> <li>i. not to exceed 30 days if health or safety of other tenants, PHA employees or persons residing in the vicinity are threatened or in the event of drug-related or violent criminal activity or any felony conviction;</li> <li>ii. 14 days for non-payment of rent;</li> <li>iii. 30 days in any other case unless State or local law provide for a shorter time period.</li> </ul>
7. Grievance process  See PIH Notice 2012-32 Section 1.6.C.7
8. Establishment of Waiting List  See PIH Notice 2012-32 Section 1.6D
9. Resident Participation and Funding  See PIH Notice 2012-32 Attachment 1B.2

**10. Renewal of Lease**

**PHA's are required to renew the lease at expiration unless good cause exists for non-renewal.**

**Site Selection and Neighborhood Standards Review**

While AAHC does not currently contemplate a Transfer of Assistance under the RAD conversion plan, the following table lists out each of the required elements a Site and Neighborhood Standards Review in the event of a Transfer of Assistance. A Site and Neighborhood Standards review will be conducted in conjunction with the Financing Plan stage in the event of a proposed transfer.

<p>1. For All Transfers:</p>	<p>Description of the new site and how it is adequate for the needs of the tenants and is consistent with or furthers the goal of deconcentrating poverty.</p> <p>Various methods for demonstrating furthering the goals of deconcentrating poverty include:</p> <ul style="list-style-type: none"> <li>• Mixed income developments;</li> <li>• Development in a HUD Enterprise Zone, Economic Community, Renewal Community or a Revitalization Zone, including any areas where current or future HOPE VI or Choice Neighborhoods Initiative developments exist.</li> </ul>
<p>2. If transferring assistance to an area of concentrated poverty:</p>	<p>Examination of whether the poverty rate has declined in the area, and whether your development will lead to an increase or decrease in poverty in the census tract.</p>
<p>3. If transferring assistance to a development qualifying as new construction in an area of minority concentration:</p>	<p>1) Sufficiency of comparable opportunities for minority families in the income range to be served by the project outside areas of minority concentration;</p> <ul style="list-style-type: none"> <li>○ Please examine 24 CFR §983.57(e)(3)(iv) &amp; (v) to see more on comparable opportunities.</li> </ul> <p>2) If there is an overriding housing need, which includes whether this is an integral part of an overall</p>



	redevelopment strategy in a revitalizing area; <ul style="list-style-type: none"> <li>○ Please see 24 CFR §983.57(e)(3)(vi) for more information on overriding housing needs.</li> </ul>
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**Relocation Plans**

*AAHC will be required to temporary relocate residents during the renovation process at all of the properties undergoing a RAD conversion. As detailed relocation plans are developed, they are added to the AAHC website. AAHC will complete the required RAD Accessibility and Relocation Checklist and submit them with the Financing Plan as each conversion transaction moves forward.*

**Impact on Capital Fund Grants, CFFP, and RHF**

*For each public housing property converted from public housing to Section 8 under the RAD program, a pro-rata portion of AAHC’s current and future Capital Fund Budget grants will be reduced, as this budget amount will be transferred to the Section 8 property contract rent amount.*

*The RAD conversions described above will not impact any existing Capital Fund Financing Program (CFFP) and will not utilize Replacement Housing Factor (RHF) funds to facilitate the conversions.*

**CHANGES IN ELIGIBILITY, ADMISSION, SELECTION AND OCCUPANCY**

*There are very few expected changes in eligibility, admission, selection, and occupancy of units policies as a result of the RAD conversion other than those required by the project-based voucher program under 24 CFR Part 983. The AAHC’s Administration Plan includes a chapter on Project Based Vouchers in Chapter 17. The following changes are known based on the difference between HUD public housing regulations and HUD project-based voucher regulations:*

- 1) Earned Income Disability – public housing residents are eligible even if they are not disabled. A public housing resident that is utilizing the EID, will continue to be eligible after conversion, even if they are not disabled. However, new residents in PBV units will only be eligible if they are disabled.*
- 2) Public Housing Income limits are 80% AMI and PBV income limits are 50% AMI. At the time of conversion, an over-income tenant is allowed to stay in a RAD PBV unit and the unit will remain assisted until the tenant moves. However, if the unit also has Low Income Housing Tax Credit Financing, the tenant must meet the LIHTC income limits. The AAHC will offer public housing residents who are over-income and living in a unit that will be receiving LIHTC, an opportunity to move into a RAD PBV unit that does not have LIHTC restrictions.*
- 3) Lease Terminations for Public Housing units allow 14-day notice for nonpayment, up to 30-days notice for activities that threaten others or for drug or other violent crimes. PBV units are required to follow state and local laws*

- 4) *Over or under-housed tenants will be relocated to an appropriate sized unit after rehabilitation is completed as a result of the conversion from public housing to PBV.*

## **B. PROJECT BASED VOUCHER PROGRAM**

*The AAHC may commit up to 20% of its budget authority for Housing Choice Vouchers to Project-Based Vouchers (not including the PBVs in the RAD program).*

1. ***Non-Profit Housing Providers*** – *The AAHC anticipates providing PBVs for local nonprofit housing providers that are providing permanent supportive housing for extremely low-income households, households with special needs, and homeless households. Project based vouchers must be financially necessary to ensure operating viability of the units.*
2. ***AAHC de minimis RAD units.*** *Under RAD, up to 5% of the units can be removed from public housing and disposed of or converted as the AAHC deems appropriate. The AAHC will utilize the de minimis opportunity to convert up to 5% of its public housing units to project-based vouchers using the AAHC’s existing Housing Choice Voucher allocation. The AAHC will make this conversion when it is necessary to make the project financially feasible.*
3. ***Existing Project Based Voucher Programs:*** *The AAHC has 2 Project Based Voucher programs. The first is a 20-unit project owned and managed by Avalon Housing at 1440 Pear Street in Ann Arbor. All of the units are 1-bedroom. The AAHC is also partnering with the VA and Avalon to complete a 5-unit VASH Project Based Voucher program.*

## **C. HOMEOWNERSHIP PROGRAMS**

*The AAHC has one remaining PH Turnkey III Homeownership unit that will be sold to a low-income homebuyer. The AAHC does have a Housing Choice Voucher Homeownership program that currently has 5 participants. The AAHC is working with a coalition of nonprofits called the Washtenaw Housing Education Partners to encourage voucher holders to convert their vouchers to ownership.*

### **Section 8 Capital Improvements**

Please complete Parts 8.1 through 8.3, as applicable.

### **Section 8.1 Capital Fund Program Annual Statement/Performance and Evaluation Report**

As part of the PHA 5-Year and Annual Plan, annually complete and submit the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1, for each current and open CFP grant and CFFP financing.

*See attached forms 50075.1 for CFP501-11 (revised), CFP501-12 (revised), CFR501-13 (revised) and CFR501-14 (revised), CFP501-15 (initial),*

## Section 8.2 Capital Fund Program Five-Year Action Plan

As part of the submission of the Annual Plan, PHAs must complete and submit the *Capital Fund Program Five-Year Action Plan*, form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan.

*See attached HUD 50075.2*

## Section 8.3 Capital Fund Financing Program (CFFP)

Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements.

*Not Applicable*

## Section 9.0 Housing Needs

Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

Family Type	# in Washtenaw County	# with housing problems	% with housing problems	# with over crowding	# & % on AAHC PH wait list	# & % on AAHC S8 HCV wait list	# & % on Pear PBV wait list	Total # & % on AAHC wait lists
TOTAL	132,860	48,675	35%	1,920	632	385	205	1222
ELI <30%AMI	22,195	18,610	84%	670	592 93%	350 91%	200 97.6%	1142 93%
VLI 30-50% AMI	15,510	10,880	70%	460	5 0.8%	29 7.5%	5 2.4%	39 3%
LI 50-80%AMI	21,805	8,720	40%	460	35 5.5%	6 1.6%	None	41 3%
No special designation					140 23%	83 21.6%	89 43.4%	312 26%
Families with children	19,765				332 53%	235 61%	41 20%	608 50%
Elderly families	26,104	7,745	30%		14 3%	10 2.6%	4 2%	28 2%
Disabled families	9,929	4,650	47%		147 24%	57 14.8%	71 34.6%	275 23%
Race/Black	15,410	8,165	53%		440	292	132	864

					69.5%	75.8%	64.4%	71%
Race/White	101,700	33,760	33%		143 22.6%	36 9.4%	46 22.4%	225 18%
Race/Asian	10,095	4,060	40%		2 .3%	1 .3%	None	3 0%
Race/Am Ind	300	110	37%		3 .5%	1 .3%	3 1.5%	7 1%
Race/Pac Islander	30	30	100%		None	None	None	0
Race/Other or unknown	1,930	890	46%		45 7%	55 14%	24 11%	124 10%
Ethnicity/Hispanic	3,414	1,690	50%		21 4%	6 1.6%	6 2.9%	17/6%

HUD CHAS DATA 2005-2009 and AAHC waitlist data

## Section 9.1 Strategy for Addressing Housing Needs

Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan.

- *Maximize the lease-up rates in Section 8, subject to budget authority.*
- *Allocate funding from the Section 8 New Construction fund for Cranbrook Towers toward acquisition of property to develop as affordable housing or rehabilitation of existing housing.*
- *Redevelop existing sites through demolition and new construction where the units are deteriorated to the point where demolition and new construction is more feasible than rehabilitation.*
  - *Increase total number of apartments*
  - *Increase number of accessible and visitable apartments*
  - *Increase building performance*
- *Issue Request for Proposal for project-based vouchers in the City of Ann Arbor to de-concentrate poverty*
- *Increase payment standard in the City of Ann Arbor and other high cost areas to de-concentrate poverty and increase housing choice opportunities*

## Section 10.0 Additional Information (a)

Describe the following, as well as any additional information HUD has requested. Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan.

### ***Progress on FY 10 – FY 14 Goals***

*Goal 1) Issue RFP and contract for a capital needs assessment for PH, including but not limited to: Targeted capital improvements in 5-yr CFP Plan, Asset disposition or retention; and/or, Voluntary conversion of public housing to tenant based vouchers*

*Progress Goal 1) The AAHC was approved by HUD to convert 100% of its public housing units to project based vouchers under RAD. Every unit that is being rehabbed has had a RAD Physical Needs Assessment completed to determine the scope of work needed, the replacement schedule, energy efficiency improvements, and any environmental issues that need to be addressed. As part of the RAD process, up to 5% of the public housing units being converted can be removed from the public housing stock as well as the RAD project-based voucher. The AAHC will be converting those units to regular project-based vouchers instead of RAD vouchers because the payment standards are higher, which will increase the financial feasibility of the converted projects.*

*Goal 2) Issue RFP and contract for operational and organizational assessment which will include: assessing the pros/cons of asset management model for PHA of 360 units, operational practices for improved efficiencies and effectiveness of service delivery, and compensation and employee staffing configuration*

*Progress Goal 2) The AAHC hired Schumaker and Company to conduct an Operational Needs Assessment which was completed in 2010 with recommendations on staffing, asset management and service delivery. Staffing changes have evolved over 5 years as the operations continue to evolve. A Deputy Director position was created and then eliminated. A Financial Analyst position was added. Two Residency Managers, a Facility and Maintenance Manager and a Section 8 Manager were hired. The ONA recommended outsourcing maintenance and separating the Section 8 program from the Public Housing program, which were not implemented. The AAHC continues to follow asset management practices required by HUD. Service delivery improvements include increased use of technology in all aspects of the organizations operations, increased office hours, on-line waitlist application process, streamlined paperwork for tenants. Both the Administrative Plan for the voucher program and the Admissions and Continued Occupancy Policies (ACOP) were completely updated in 2012. Employee compensation was set at 90% of market in 2010 and is under review by the City Human Resources department to bring it to market level.*

*Goal 3) Analyze the relationship of the AAHC and the City, to determine the beneficial relationship for the commission, be it: total separation, modification of existing relationship but within current framework or development of closer relationship with city.*

*Progress Goal 3) The AAHC Board and City Council have affirmed a closer relationship by approving a resolution stating the City's intention to remain the employer of the AAHC staff and entering into a Memorandum of Understanding defining these roles. The City also has an ordinance requiring all AAHC properties to be acquired by the City, which can be transferred to the AAHC through Council resolution.*

*The City of Ann Arbor continues to be very supportive of the Commission during the past three fiscal years. The City provided \$269,000 in general fund support to the AAHC to cover the federal HUD operating reductions from Congress and HUD. The City provides the Commission with Human Resources and IT support. The City's IT Department took a lead role in assisting the Commission with the purchase and installation of security cameras at its*

*public housing sites and took an active role in helping the AAHC staff fully utilize its property management software (Yardi).*

*The Ann Arbor Police Department acts as an authorized agent of the Commission and provides on-going support as needed. The AAPD has a sub-station at Maple Meadows. The City's Fire Department offers fire safety training and assisted in the development of fire evacuation plans at the Commission's two high-rise facilities. The Community Services Area of the City has embraced the Commission as one of its components, including the Commission in its monthly departmental meetings. This has helped to develop strong relationships between the Commission and City staff in the Building, Planning, Community Development and Parks/Rec Departments. The Commission is a participant at the City's Council agenda meetings and is therefore able to stay abreast of broader city issues and concerns.*

*Goal 4) Upon completion of 1 – 3 above, and data gathered there from, the AAHC will develop a 5-year plan to stabilize and strengthen the organization, and effectively carry out its mission to provide continued affordable and desirable housing to the highest risk very-low to extremely low-income individuals and families in our community*

*Progress Goal 4) The AAHC has developed a multitude of strategies to stabilize its organizational operations by seeking to diversify its funding and streamlining operations. Unfortunately, Congress has continued to under-fund operations for both the public housing and voucher programs. Without the support of the City of Ann Arbor, the AAHC would not be able to continue operations at a standard level. The AAHC can only become a high performing agency with additional resources to hire additional staff. The AAHC has secured over \$35 million in capital funding to reinvest in its properties as well as over \$1 million in funding for tenant services. However, less than 1% of these funds can be used for operational support for AAHC staffing. On the housing side, the AAHC has invested in energy efficiency improvements and durable products to lower the long-term operating costs of its buildings. However, the Voucher program is dependent on adequate funding from Congress and HUD. HUD is currently providing less than 85% of the operating and administrative fees that are due to the AAHC. Over 250 housing authorities have given back their voucher programs to HUD because they could not afford to operate them.*

*Goal 5) Throughout the 5-year period, the AAHC will work to leverage community support for improved scope and scale of supportive services for all populations served by the AAHC, to improve their quality of life and economic efficiency.*

*Progress on Goal 5) The AAHC has partnered with Ozone House, Peace Neighborhood Center, Avalon Housing, Interfaith Hospitality Network, Catholic Social Services Community Action Network, and Community Support and Treatment Services to provide supportive services to our tenants so that they can maintain their housing and improve their economic self-sufficiency in order to move out of our housing. The AAHC has secured funding to provide a 24 hour front door and services at Miller Manor as well as day services for other sites through the Continuum of Care. The AAHC also secured a Family Self Sufficiency grant from HUD for public housing tenants which is now merged with the FSS program for voucher tenants.*

Goal 6) Through-out the 5-year period, the AAHC will strive to improve its Customer Service to all participants of its programs.

*Progress on Goal 6) Customer service improvements include increased use of technology in all aspects of the organizations operations, increased office hours, on-line waitlist application process, and streamlined paperwork for tenants. The AAHC has decreased the frequency that voucher tenants must come to the office to complete their paperwork by processing documents by mail, fax and e-mail whenever feasible. Staff have been increasing communications with tenants by e-mail to increase the timeliness of communications.*

## **Section 10.0 Additional Information (b)**

Provide the PHA's definition of "significant amendment" and "substantial deviation/modification"

*"Significant Amendment" is defined to mean a change in policy that redirects the Ann Arbor Housing Commission's course and/or revises its mission, goals and objectives.*

*"Substantial deviation or modification" is defined as a change to the Ann Arbor Housing Commission's policies that reflect a directional shift from the published mission and policies included in the Annual Agency Plan.*

*Changes in the following areas may qualify as a "significant amendment or substantial deviation/modification":*

- 1) changes to rent that could negatively impact tenants such as increasing the minimum rent or increasing flat rent;*
- 2) changes to admission policies or organization of the waiting list;*
- 3) Any change with regard to demolition, disposition, or conversion activities .*

*Changes in the following areas do not qualify as a "significant amendment or substantial deviation/modification":*

- 1) Changes to Ann Arbor Housing Commission internal policies that regulate administrative function, such as Check Signing Policy, Travel Policy, Vehicle Use Policy and the like*
- 2) Changes to Occupancy Policies (Public Housing and Section 8) that clarify or expound on existing policies included in the Agency Plan*
- 3) Changes to policies included in the Annual Agency Plan that are a result of regulatory requirement are also not considered by the Ann Arbor Housing Commission or the Department of Housing and Urban Development*
- 4) Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include the use of additional Capital Funds;*
- 5) Changes to the construction and rehabilitation plan for each approved RAD conversion; and*

- 6) *Changes to the financing structure for each approved RAD conversion*
- 7) *Changes to the Homeownership, Family Self-Sufficiency or Project-Based voucher programs*

## **Section 11.0 Required Submission for HUD Field Office Review.**

In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. **Note:** Faxed copies of these documents will not be accepted by the Field Office.

- (a) Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations* (which includes all certifications relating to Civil Rights)
- (b) Form HUD-50070, *Certification for a Drug-Free Workplace* (PHAs receiving CFP grants only)
- (c) Form HUD-50071, *Certification of Payments to Influence Federal Transactions* (PHAs receiving CFP grants only)
- (d) Form SF-LLL, *Disclosure of Lobbying Activities* (PHAs receiving CFP grants only)
- (e) Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet* (PHAs receiving CFP grants only)
- (f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations.
- (g) Challenged Elements
- (h) Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report* (PHAs receiving CFP grants only)
- (i) Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan* (PHAs receiving CFP grants only)

### **Challenged Elements**

*No elements of the Ann Arbor Housing commission's 5-Year Agency Plan for FY 15 to FY 19 have been challenged.*

### **Resident Comments**

The Resident Advisory Board met on February 5, 2015 with the Executive Director, Jennifer Hall.

RAB Members: Karen Wanza, Tracie Barnard, Vernard Randle, Renee Conley, Fred Dawkins, and Michael Brann



Ms. Hall met with the RAB to discuss what they believe is working well where they live, what they would like to see change, and their observations about the community. Ms. Hall also went over the details of the 5-year plan.

Mr. Brann and Ms. Conley both expressed that they believe that it is the neighbors responsibility to deal with problems with other neighbors. They both let people know when they are behaving poorly like gambling and drinking outside, selling drugs, or even kids playing on someone else's property. They treat people with respect but tell them to move along and take their drama somewhere else.

The group had a discussion about the plight of black children who are dying unnecessarily. As Ms. Conley put it, she wants to see her own people do good.

Ms. Wanza stated that their used to be a lot of crime at Miller and they could not get anyone to do anything about it. Now the AAHC is doing something about it.

Ms. Barnard stated that she has grown children, she went back to school and found a good job. But now her income has increased and with her young adult children's income, she is over-income for our housing. What is in place for families in that situation? Ms. Hall indicated that it is a difficult transition. HUD does not provide for families to have 2 subsidies when the children reach adulthood or a family divorces. HUD only provides one subsidy to the head of household and anyone else in the household that wants to live independently must apply to the waitlist to get subsidized housing. Ms. Barnard also worried about people going into the private sector for the first time when they may not be credit worthy.

Ms. Hall explained that the AAHC has a Family Self Sufficiency program managed by Greg Mitchell and Wade Smith. One of the things they help families with is financial literacy, repairing credit etc. so they can become self-sufficient. They are taking names from interested tenants for a waiting list to get into the program. They will add people to the program as soon as they have other people who graduate or drop from the FSS program. She encouraged Ms. Barnard contact the front desk at Miller to get on the FSS waitlist.

Ms. Barnard asked about the change in income caps from 80% of Area Median Income (AMI) to 50% AMI. Ms. Hall explained that under public housing the income cap is 80% AMI but 40% of households have to be below 30% AMI. For the first 5 RAD PBV projects the income cap was set at 50% AMI.

Ms. Hall also explained that a number of tenants with higher incomes have been paying flat rents and it was a coincidence that HUD made it mandatory to set the flat rents at 80% of Fair Market Rents at the same time we were converting to RAD project-based vouchers. So some people thought their rents were going up due to RAD but it was because they were paying flat rents and the formula changed.

Ms. Barnard heard that under RAD college students are treated differently. Ms. Hall stated that the public housing, voucher and tax credit programs, do unfortunately have some rules that are different from each other. She will provide a table of those differences to the RAB. HUD does

have rules around students because they want to encourage people to get an education but they are not in the business of providing student housing for U-M students for example, who may be low-income on paper, but who have families who are not low-income.

Ms. Conley stated that the garbage at her apartment on the ground and around the dumpster drives her crazy. Her son gets a stipend from the AAHC to keep the site clean. Tenants don't know how to recycle and fill the recycle bins up with garbage and then the city won't pick them up. Neighbors are constantly dumping their garbage at Maple Meadows. She asks them to stop when she sees it and has taken videos. Ms. Hall responded that this is also a big concern of management. It only takes one ticket for people to stop illegally dumping. As part of the renovations, the AAHC is trying to figure out how to make the dumpster areas look better and how to discourage illegal dumping. The cameras will be on the dumpsters. And please do send videos to property management to follow-up on.

Mr. Dawkins added that AAHC should not make it more difficult for tenants to throw their garbage away, while trying to discourage non-tenants, because then they will just throw it on the ground. He also suggested that a second dumpster be added at Maple Meadows on the west side of the property because it is such a long walk to get to the dumpster. Ms. Hall said she would look into it to see if there is room. The city park and the AAHC property are adjacent to each other so we will have to see where the property line is. Ms. Hall asked the city to look into allowing parking on Russell so that our tenants on that side of Maple Meadows can park on the street. The city said that people can park at the very end of Russell and Bens street for the city park and should not get towed. Ms. Conley agreed that additional parking would be helpful at Maple Meadows.

Ms. Wanza indicated that parking at Miller is a problem too. There is still a van in the lot that belongs to a previous tenant's son that does not work and should be towed. Ms. Hall stated she would let the property manager know.

Ms. Wanza and Mr. Randle stated that there are people who have been kicked out of Miller by AAHC property management who just wait until staff leave and then come to Miller and sleep in the common areas and do drugs in the hallway. Ms. Hall let them know that after renovations, Miller will have a 24-hour front desk staffed by Avalon Housing as well as case managers on site. There will also be additional cameras. Ms. Conley suggested that people should be responsible for their own guests. Ms. Wanza stated that West Park has problems too, and it can be seen more since they cut all the trees down. Ms. Hall responded that the AAHC has hired security guards to do random walks on properties but they can only afford to pay for 60 hours/week for all their properties. Several people indicated that the guards are not random and don't always tell tenants to turn their music down. Ms. Conley and Mr. Brann said that the riff raff do usually scatter when they see them.

Mr. Brann is the Hikone Resident Council president and he tells his neighbors to deal with their own company. The problem is kids who are outside without their parents. Mr. Dawkins added that parents are trying to be friends with their kids instead of parents.

Ms. Barnard asked what happens when a tenant calls to complain about a neighbor. Ms. Hall responded that the AAHC property manager will follow up and investigate. AAHC staff have to maintain confidentiality with tenants – both the ones complaining and the ones being complained about. Consequently, AAHC staff will not report back to the ones complaining what was done. Sometimes, a tenant is evicted based on problems that other tenants let the AAHC know about, but evictions have to go through due process and can take a long time. So it may look like the AAHC is not responding, but we are.

Ms. Conley is really annoyed with all the shopping carts at Maple Meadows as well as people parking in handicap spaces. Ms. Hall stated that people are doing that at their own risk because they can get towed.

Ms. Hall asked about the services provided at the Community Centers. Ms. Conley said she does like to see Peace Neighborhood Center staff on site interacting with the children. She would like to see them on site even more. Ms. Barnard likes the idea of it. Her daughter went and sometimes ended up playing instead of getting her homework done. Staff turnover can sometimes cause inconsistencies in the services provided.

Ms. Barnard and Ms. Conley asked how the vouchers being offered under relocation worked. Ms. Hall responded that the vouchers can be temporary or permanent, and it is the choice of the tenants. If the tenant wants to move temporarily, then they move while renovations are being done, and then move back when there is a renovated apartment available. The tenant has to find a private landlord to rent from whose rent falls within the payment standard of the voucher. Just like public housing, the tenant pays 30% of their adjusted income on rent and the voucher pays the rest of the rent. However, if a tenant chooses to move permanently with a voucher, they cannot decide later that they want to move back into our renovated properties. The only way they can move back is to either get back on the waiting list, or if they become homeless, they can get back in quicker through the homeless waitlist process. Ms. Conley approved of the policy that you can't return unless you become homeless. Ms. Conley offered her services as a counselor for other tenants for free. She distributed her business cards. Ms. Hall thanked her for the generous offer and suggested she also connect with Peace to see how she could provide services to Maple Meadows tenants.

Mr. Dawkins said that living at Broadway is very difficult without a vehicle. The bus is either at the top of the hill on Plymouth or down Broadway and up Plymouth. It is difficult to get groceries, voting or even getting taxes done. Could there be some kind of transportation assistance? Ms. Hall acknowledged that Broadway is the one location where there is literally not a bus stop in front of the property like every other AAHC site. It is one of the few streets in Ann Arbor with poor bus access. Ms. Wanza suggested that he take the \$1 A-ride which is a cab for low-income residents who have a disabled household member. Ms. Conley suggested using Turbotax, which is free on-line now for the basic package and it is user friendly. Ms. Barnard said that she was able to get a free car from Friends in Deed because she needed one for her new job in Detroit and Mr. Dawkins should try them.

Ms. Conley stated that she knows we had a terrible snow storm on Monday, but the snow was not removed from Maple Meadows until late in the evening. Ms. Hall acknowledged that it was a

problem. AAHC staff were very upset with our snow removal company and were calling them all day to get out to the sites. Apparently the snow removal company who does the west side properties, including Maple Meadows, had several employees call in sick and two trucks break down that day. If it continues to be a problem, and was not a one-time occurrence the AAHC staff will find another company.

Ms. Wanza asked about the homeless people who are moving to Miller Manor with nothing. What are they going to do, they are living like they are still on the streets. Ms. Hall responded that the AAHC is working with Avalon to figure out how to provide basics like a bed, kitchen supplies, towels etc for homeless households when they move in.

Ms. Wanza said that the property manager, Reggie Dalton, told her that the medical expense deductions are changing for RAD PBV from public housing. Ms. Hall stated that she can send her the rule changes.

Mr. Dawkins asked if the AAHC would start accepting credit card payments? Ms. Hall indicated that it was a priority for her and she has already asked the Finance staff to figure out how to get that done and how to enable payments on-line as well. She would like it to be done by the end of the year.

Ms. Wanza asked for larger recycle bins and for education to tenants on how to recycle. Ms. Hall thought that was a good idea. Ms. Wanza also suggested a neighborhood clean-up. Mr. Dawkins asked how do we get apathetic people motivated? Ms. Conley said we have to help them get motivated. Mr. Brann said that CAN has brought in motivational speakers at Hikone.

The RAB agreed with the AAHC goals, priorities and policies in the 5-year plan. They supported the efforts to renovate existing AAHC properties and encouraged efforts to add affordable housing in the City of Ann Arbor.

### **Continuum of Care Comments – March 11, 2015 meeting**

Can the screening process for new applications remove the barrier that a person who was evicted from a previous federally subsidized program in the last 3 years be removed because it could be a barrier for some homeless households? Ms. Hall indicated that this can be removed upon approval by the AAHC board.

## Definitions and Acronyms

**AAA IB:** Ann Arbor Area Agency on Aging.

**ACOP:** Admissions and Continued Occupancy Policy. The policies and procedures that the Housing Commission has adopted, based on HUD and local regulations, that govern public housing units.

**Administrative Plan:** The policies and procedures that the Housing Commission has adopted, based on HUD and local regulations, that govern voucher programs.

**AMP:** Asset Management Project. In 2007, HUD required Housing Authorities with more than 250 units, to organize and manage those units into multiple AMPS. Ann Arbor divided its units into an East and a West AMP.

**CAN:** Community Action Network. A nonprofit service provider located at the Northside Community Center. The AAHC contracts with CAN to directly serve public housing residents at Hikone and Green Baxter Courts. CAN also received a ROSS grant to serve all public housing residents become self-sufficient.

**CSTS:** Community Support and Treatment Services. Formerly Community Mental Health. The AAHC contracts with CSTS to provide services to residents primarily at Miller and Baker.

**FMR:** Fair Market Rent. HUD determines the Fair Market Rent by doing a rental market study and uses the 40<sup>th</sup> percentile of rental rates by unit size from the previous 2 years (not including new units and subsidized units).

**FSS:** Family Self Sufficiency program. A HUD program that encourages communities to develop local strategies to help voucher families obtain employment that will lead to economic independence and self-sufficiency.

**HAP:** Housing Assistance Payment. A HAP contract is executed between the AAHC and a private landlord that has signed a lease with a Section 8 tenant so that the AAHC can pay the landlord a rent subsidy.

**HCV:** Housing Choice Vouchers. Formerly known as Section 8 vouchers. These vouchers are tenant based vouchers unless they are specially designated as project-based vouchers. Tenant vouchers are attached to the tenant and provide a rent subsidy at whatever qualified unit a tenant moves to. Project based vouchers are attached to the unit so that any qualified tenant who lives in that unit, receives a rent subsidy.

**HQS:** Housing Quality Standard. A unit must be inspected to make sure that it meets the HQS standard before a unit is approved for a tenant with a Voucher.

**PEACE:** Peace Neighborhood Center. A nonprofit service provider located on North Maple Road. The AAHC contracts with Peace to directly serve public housing residents at Maple Meadows and North Maple Estates.

**PIC:** HUD's inventory management system that the AAHC must report to HUD the inventory, condition, and occupancy of the public housing units.

**PHA:** Public Housing Authority. i.e Ann Arbor Housing Commission

**PHAS:** Public Housing Assessment System. HUD uses 10 indicators (such as occupancy rate, and accounts receivable from tenants) to monitor and rate Public Housing Authorities across the nation for their public housing properties.

**PNA:** Physical Needs Assessment. Conducted by an outside contractor to provide a guide to the AAHC on the physical condition of the buildings, the life expectancy of building features such as the roof or boiler, as well as the replacement cost.

**ROSS-SC:** Resident Opportunity and Self Sufficiency Service Coordinators. This three-year HUD grant will support the AAHC's tenants to earn skills, find employment and become self-sufficient.

**SEMAP:** Section Eight Management Assessment Program. HUD uses 15 indicators (such as HQS inspections, occupancy rate, and rent reasonableness) to monitor and rate Public Housing Authorities across the nation for their voucher programs (previously Section 8).

**City of Ann Arbor Housing Commission**

<b>TOTALS</b>			
<b>Location</b>	<b>Yr Built</b>	<b># of Units</b>	<b>Addresses</b>
Baker Commons (RAD PBV)	1980	64	106 Packard
Broadway Terrace	1956	20	1504 - 1506 Broadway
Evelyn Court	1995	1	909 Evelyn Court
Garden Circle (Turnkey)	1971	1	2072 Garden Circle
Green Baxter Court (RAD PBV)	1970	23	1701 - 1747 Green Road
Hikone (RAD PBV)	1970	29	2702 - 2760 Hikone
Hillside Manor	1996	6	1020 - 1042 Pennsylvania
Lower Platt	1970	4	3451 - 3457 Platt
Mallett's Creek	1996	6	2670 -2680 South Main St
Maple Meadows (RAD PBV)	1970	29	800 - 890 South Maple
Miller Manor (RAD PBV)	1971	106	727 Miller
North Maple Estates	1969	19	701 - 739 North Maple
North Maple Duplexes	1998	4	743 - 749 North Maple
Oakwood	1969	3	3565 - 3685 Oakwood
South Seventh	1969	8	221 - 253 S. Seventh
Upper Platt (Colonial Square)	1964	5	3681 -3689 Platt
West Washington	1969	2	805 - 807 W. Washington
White/State/Henry	1948	28	1514 & 1520 White, 1521 State, 701 - 719 Henry
<b>Summation</b>		<b>359</b>	

**PHA Certifications of Compliance with the PHA Plans and Related Regulations:  
Board Resolution to Accompany the PHA 5-Year and Annual PHA Plan**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the  5-Year and/or  Annual PHA Plan for the PHA fiscal year beginning 2015, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:*

1. The 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.
2. 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.
3. The PHA certifies that there has been no change, significant or otherwise, to the Capital Fund Program (and Capital Fund Program/Replacement Housing Factor) Annual Statement(s), since submission of its last approved Annual Plan. The Capital Fund Program Annual Statement/Annual Statement/Performance and Evaluation Report must be submitted annually even if there is no change.
4. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it 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.
7. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. For PHA Plan that includes a policy for site based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2006-24);
  - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing;
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. 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.
11. 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.



12. 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.
13. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
14. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
15. 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.
16. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
17. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
18. 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), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
19. 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 regulations and included in its Plan.
20. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA 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 PHA Plan and will continue to be made available at least at the primary business office of the PHA.
21. The PHA provides assurance as part of this certification that:
  - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
22. The PHA certifies that it is in compliance with all applicable Federal statutory and regulatory requirements.

Ann Arbor Housing Commission

MI-064

PHA Name

PHA Number/HA Code

5-Year PHA Plan for Fiscal Years 2015 - 2019

Annual PHA Plan for Fiscal Years 20     - 20    

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)

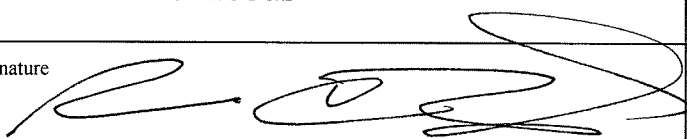
Name of Authorized Official

Ronald Woods

Title

Board President

Signature



Date

3/18/2015

**Civil Rights Certification**

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

**Civil Rights Certification**

**Annual Certification and Board Resolution**

*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 Commissioner, I approve the submission of the Plan for the PHA of which this document is a part and make the following certification and agreement with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:*

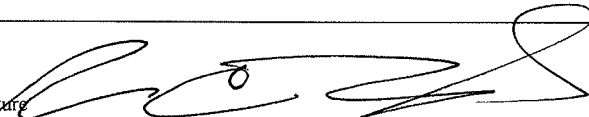
The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing.

Ann Arbor Housing Commission

MI064

\_\_\_\_\_  
PHA Name

\_\_\_\_\_  
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)	
Name of Authorized Official <b>Ronald Woods</b>	Title <b>Board Chair - President</b>
Signature 	Date <b>03/18/2015</b>

**Certification by State or Local  
Official of PHA Plans Consistency  
with the Consolidated Plan**

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

**Certification by State or Local Official of PHA Plans Consistency with the  
Consolidated Plan**

I, Verna J. McDaniel the County Administrator certify that the Five Year and Annual PHA Plan of the Ann Arbor Housing Commission is consistent with the Consolidated Plan of Washtenaw County prepared pursuant to 24 CFR Part 91.

  
\_\_\_\_\_  
Signed / Dated by Appropriate State or Local Official

# Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

Applicant Name

Ann Arbor Housing Commission

Program/Activity Receiving Federal Grant Funding

Public Housing, CFP, SPC, SHP, Section 8, S8 New Construction, FSS, Community Challenge Planning Grant, CDBG, VASH

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 Federal agency 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.)

727 Miller, Ann Arbor, Washtenaw County, Michigan, 48103 (S8, PH, FSS, CCPG, CDBG, CFP, VASH)

106 Packard, Ann Arbor, Washtenaw County, Michigan, 48105 (PH, FSS)

404 N. Ashley, Ann Arbor, Washtenaw County, Michigan, 48103 (PH, FSS, S8, S8 New, CCPG, CDBG, CoC, CFP, VASH)

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)

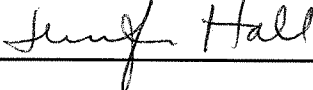
Name of Authorized Official

Jennifer Hall

Title

Executive Director

Signature

X 

Date

03/18/2015

# Certification of Payments to Influence Federal Transactions

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

Applicant Name

Ann Arbor Housing Commission

Program/Activity Receiving Federal Grant Funding

Public Housing, CFP, SPC, SHP, Section 8, S8 New Construction, FSS, Community Challenge Planning Grant, CDBG, VASH

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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)

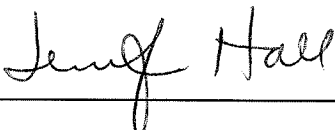
Name of Authorized Official

Jennifer Hall

Title

Executive Director

Signature



Date (mm/dd/yyyy)

03/18/2015

## DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

Approved by OMB

0348-0046

(See reverse for public burden disclosure.)

<b>1. Type of Federal Action:</b> <input type="checkbox"/> a. contract <input checked="" type="checkbox"/> b. grant c. cooperative agreement d. loan e. loan guarantee f. loan insurance	<b>2. Status of Federal Action:</b> <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	<b>3. Report Type:</b> <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change <b>For Material Change Only:</b> year _____ quarter _____ date of last report _____
<b>4. Name and Address of Reporting Entity:</b> <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known:  Congressional District, if known: 15th	<b>5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:</b>  Congressional District, if known:	
<b>6. Federal Department/Agency:</b> US Dept of Housing and Urban Development	<b>7. Federal Program Name/Description:</b>  CFDA Number, if applicable: 14.872	
<b>8. Federal Action Number, if known:</b> 5 Year and Annual Agency Action Plan	<b>9. Award Amount, if known:</b> \$ 151,000	
<b>10. a. Name and Address of Lobbying Registrant</b> <i>(if individual, last name, first name, MI):</i> N/A	<b>b. Individuals Performing Services</b> <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i>	
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature: <u>Jennifer Hall</u> Print Name: <u>Jennifer Hall</u> Title: <u>Executive Director</u> Telephone No.: <u>734 794-6721</u> Date: <u>03/18/2015</u>	
<b>Federal Use Only:</b>		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)