

<b>Annual PHA Plan</b> <i>(Standard PHAs and Troubled PHAs)</i>	<b>U.S. Department of Housing and Urban Development</b> <b>Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226</b> <b>Expires: 02/29/2016</b>
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

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

**Definitions.**

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

A.	PHA Information.																										
A.1	<p><b>PHA Name:</b> Community Development Authority, City of Madison <span style="float: right;"><b>PHA Code:</b> WI-003</span></p> <p><b>PHA Type:</b> <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA</p> <p><b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): 01/2020</p> <p><b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p><b>Number of Public Housing (PH) Units: 766</b> <b>Number of Housing Choice Vouchers (HCVs): 1,910</b></p> <p><b>Total Combined Units/Vouchers 2,676</b></p> <p><b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 15%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 25%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 12.5%;">PH</th> <th style="width: 12.5%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																	
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<b>B.</b>	<b>Annual Plan Elements</b>
<b>B.1</b>	<p><b>Revision of PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p>X <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p>X <input type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p>X <input type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input type="checkbox"/> Grievance Procedures.</p> <p>X <input type="checkbox"/> Homeownership Programs.</p> <p>X <input type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input type="checkbox"/> Pet Policy.</p> <p>X <input type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input type="checkbox"/> Substantial Deviation.</p> <p>X <input type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p><b><u>Housing Needs</u></b></p> <p>The CDA relies on a number of resources to identify the greatest needs for assisted housing. These sources include the City of Madison's Consolidated Plan, Impediments to Fair Housing report, and Madison's Biennial Housing Report, as well as CDA vacancy and wait list data.</p> <p>In formulating its Consolidated Plan, the City of Madison takes into consideration U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) data, received from the U.S. Census Bureau's American Community Survey (ACS).</p> <p>The City of Madison 2020-2024 Consolidated Plan includes City goals, which have an overarching purpose to support the development of viable communities with decent housing, suitable living environments and economic opportunities for the City of Madison's low- to moderate-income households.</p> <p>Economic development and employment needs relate primarily to the need to enhance neighborhood vitality through support for additional employment opportunities and support for new and existing businesses. Neighborhood needs relate primarily to strengthening and enhancing the health of neighborhoods through support for strategic investments in community assets and amenities, as well as other planning and revitalization efforts.</p> <p>The City of Madison's housing needs revolve primarily around the high cost of housing and need for additional affordable housing. While housing quality, race, and non-housing factors play a role in the City's housing needs, housing cost burden is by far the leading challenge in the market. Moreover, the limited supply and rising cost of housing contributes to homelessness and racial inequity in housing. An overview of the Housing Needs Assessment is as follows.</p> <ul style="list-style-type: none"> <li>• Housing needs are overwhelmingly driven by a mismatch between income and housing costs, resulting in high levels of housing cost burden. Housing cost burden is prevalent among non-family renter households with income below 30% of Area Median Income. The 2019 HUD Area Median Family Income (HAMFI) for the Madison, Wisconsin area is \$100,400 for a family of four (4).</li> <li>• The 2010 Census shows Madison has a population of 233,209 individuals and 102,516 households. The 2009-2012 American Community Survey (ACS) data show that 36.9% of City of Madison households are single-person households. The same data shows that 27.1% of owner households are single-person households and that 46.7% of renter households are single-person households.</li> <li>• The City of Madison does not have an accurate estimate of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault, and stalking.</li> <li>• The most common housing problem is housing cost burden, particularly severe housing cost burden (paying over 50% of household income in housing costs). Housing cost burden is particularly prevalent among extremely low-income (under 30% of AMI) and renter households.</li> </ul>

- The City of Madison housing market is predominantly composed of White households, with small but significant Black, Asian, and Hispanic populations. Some populations, particularly American Indian, Alaskan Native, and Pacific Islander populations, are very small and therefore difficult to measure. According to the CHAS data, race and ethnicity appear to influence housing opportunities, particularly as income increases.
- For households with incomes under 50% of AMI, the vast majority of households have one or more housing problems, regardless of race or ethnicity. However, for households with incomes above 50% of AMI, African American households have significantly lower rates of housing problems than White, Asian, or Hispanic households.
- For households with incomes under 30% of AMI, the vast majority of households have one or more severe housing problems, regardless of race or ethnicity. However, for households with incomes above 30% of AMI, Asian and Hispanic households have significantly higher rates of severe housing problems.
- Populations of color are concentrated in the northern and southern parts of the City of Madison, which correspond to concentrations of housing cost burden. According to the CHAS data, race and ethnicity appear to influence housing cost burden. Black, Asian, and Hispanic households all have significantly higher rates of cost burden and severe cost burden than White households. Black households in particular have extremely high levels of housing cost burden, with over 50% of households affected.
- Asian and Hispanic households continue to have relatively high levels of housing problems, regardless of income. Black households have relatively low levels of housing problems when compared to their peers by income, but they have significantly higher levels of housing cost burden when viewed as a whole.
- The 2010 census stated that 22,383 people (or 9.6% of the Madison population) were of age 65 and over. Seventeen percent (17%) of the population over 60 years of age was 85 years of age and older, a commonly used measure for “frail” elderly.
- According to the ACS, the 2012 national average for adults age 18 to 64 with at least one disability was 10.1%. This compares to 6.7% for residents of the City of Madison. The breakdown by type of disability in the City of Madison was as follows:
  - Sensory: 1,815
  - Vision: 2,150
  - Cognitive: 5,066
  - Ambulatory: 5,343
  - Self-Care: 2,066
  - Independent Living: 3,342
- The Wisconsin Department of Health Services reported that between 1983 and 2013 there were 820 reported cases of HIV disease and 341 cases of AIDS in Dane County. In 2013, there were 423 current cases of HIV and 405 current cases of AIDS. These accounted for 12% of the documented AIDS cases in Wisconsin.

The CDA maintains a wait list for its Public Housing, Multifamily Housing, and Section 8 Housing Choice Voucher Programs. CDA wait list statistics include income, family composition, race, and ethnicity categories. At least 88% of current wait list applicants fall into the extremely low-income category; and there is a significantly higher percentage of Non-Hispanic, African American households in need of subsidized or assisted housing. The CDA’s Section 8 wait list has been closed since 2014. The Public Housing and Multifamily Housing wait list are generally open for elderly, disabled, and families with minor children.

**CDA Substantial Deviation Criteria - Significant Amendment or Modification**

The Annual Plan, along with other documents required by HUD (e.g. Section 8 Administrative Plan, Public Housing Admissions and Continued Occupancy Policies, etc.) are valuable tools in explaining to the public, the CDA’s policies and procedures. These documents are organized, readily accessible, and easy to understand. Revisions are made to help clarify these policies and procedures. Situations can arise that were not anticipated and these revisions can help to clarify what was implied or understood by the Housing Authority. Also, some administrative procedures are outlined in the CDA’s policies and these can be modified to improve efficiencies. A significant amendment or substantial deviation does not include any changes in HUD rules and regulations, which require or prohibit changes to activities listed herein; and a significant amendment or substantial deviation would be a change which was completely contradictory to existing policies and had a potentially substantial impact on a significant number of program participants and or applicants.

The CDA plans to revise its Public Housing Admissions and Continued Occupancy Policies, and Section 8 Housing Choice Voucher Program Administrative Plan to reflect the following:

## Operation and Management

### **Public Housing Admissions and Continued Occupancy Policies (ACOP)**

1. The CDA intends to correct language in its reasonable accommodation policy for equitable appeal rights. The current policy language provides additional appeal rights to Public Housing tenants through an informal hearing and an additional grievance process. The informal hearing is for applicants, and the grievance process is for tenants. Proposed change is as follows:

*If the family disagrees with the CDA's decision to grant or deny a request for a reasonable accommodation, the family may request an additional meeting with the CDA as an appeal of the decision through an informal hearing (applicable to applicants) or the grievance process (applicable to tenants - see Chapter 14). The CDA will include this information as well as any applicable information about the remedies available through HUD or other government agencies, in its final decision granting or denying a request [Page 2-12]*

2. Pursuant to HUD recommendations, the CDA intends to adopt additional eligibility criteria for full-time college students on non-parental guardian households. Implementing these HUD recommendations will assure that families in need of assistance are able to participate in HUD's programs [Page 3-4]:

*A household consisting exclusively of one or more full-time college students does not qualify as a family unless each individual in the household satisfies the following conditions:*

- *The individual either must have established a household separate from his/her parents or legal guardians for at least one year prior to application for admission or must meet the U.S. Department of Education's definition of independent student*
- *The individual must not be claimed as a dependent by his/her parents or legal guardians pursuant to Internal Revenue Service (IRS) regulations*

*To be classified as an independent student according to the Department of Education, a student must meet at least one of the following criteria:*

- *Be at least 24 years old by December 31 of the award year for which aid is sought*
- *Be married*
- *Have a child or other dependents who receive more than half their support from the student and who also live with the student*
- *Be enrolled as a graduate or professional student (e.g. medicine, dentistry, law)*
- *Be a veteran of the U.S. military*
- *Be an orphan or ward of the court through age 18*
- *Have special and unusual circumstances that can be documented to his or her college financial aid administrators. Only an experienced financial aid administrator can make this "dependency override"*

3. The CDA accepts full-applications in person or by mail, and not by fax. The CDA will begin accepting full-applications via the internet through its new applicant portal system once these policies have been adopted and the portal system has been implemented [Page 4-3].

4. For determining occupancy standards (unit bedroom size), "generations" is defined as [Page 5-4]:

*a body of living beings constituting a single step in the line of descent from an ancestor. This step involves a 20 to 30 year span of time between the birth of parents and that of their offspring, and during which children are born and grow up, become adults, and begin to have children of their own*

5. HUD mandates certain exclusions from annual income. The following will be added as exclusions from annual income [Page 6-30]:

- a. *Benefits under Section 1780 of the School Lunch Act and Child Nutrition Act of 1966*
- b. *Deferred disability benefits from the Department of Veterans Affairs, whether received as a lump sum or in monthly prospective months*
- c. *Payments, funds, or distributions authorized, established, or directed by the Seneca Nation Settlement Act of 1990 (25 U.S.C. 1774f(b))*
- d. *A lump sum or periodic payment received by an individual Indian pursuant to the Class Action Settlement Agreement in the United States District Court case entitled Elouise Cobell et al. v. Ken Salazar et al., for a period of one year from the time of receipt of that payment as provided in the Claims Resolution Act of 2010*

- e. Any amounts in an “individual development account” as provided by the Assets for Independence Act, as amended in 2002.
- f. Payments made from the proceeds of Indian tribal cases as described in Notice PIH 2013-30, “Exclusion from Income of Payments under Recent Tribal Trust Settlements” (25 U.S.C. 117b(a))
- g. Major disaster and emergency assistance received under the Robert T. Stafford Disaster Relief and Emergency Assistance Act and comparable disaster assistance provided by states, local governments, and disaster assistance organizations
- h. Distributions from an ABLE account, and actual or imputed interest on the ABLE account balance, as required under the Achieving a Better Life Experience Act of 2014 (ABLE Act)

6. The Housing Opportunity Through Modernization Act of 2016 (HOTMA) implements minimum heating requirements within Public Housing dwelling units. The CDA is located in an area where state or local residential heating standards exist and will utilize those standards, as allowed by HUD. The following Minimum Heating Standards will be implemented [Page 8-12]:

*Minimum temperature:*

*If the CDA controls the temperature, the minimum temperature in each unit must be at least [67 degrees Fahrenheit]. If the resident controls the temperature, the heating equipment must have the capability of heating to at least [67 degree Fahrenheit]. Resident needs to maintain the minimum temperature of 55 degrees Fahrenheit to prevent equipment damage or freezing of pipes in the unit*

*Minimum temperature capability:*

*PHAs are allowed flexibility in maintenance of the indoor temperature when the outdoor temperature approaches the design day temperature. At no point should indoor temperatures in occupied space drop below 55 degrees Fahrenheit. This flexibility applies when at least one of the below criteria are met: The outside temperature reaches or drops below the design day temperature, or The outside temperature is within five degrees Fahrenheit of the design day temperature for more than two continuous days*

*Measurement:*

*Temperature measurements must be taken according to the following methodology: Temperature measurements must be taken three feet above the floor and two feet from an exterior wall in a habitable room.*

7. HOTMA placed an income limitation on public housing tenancies. The over-income requirement states that after a family’s adjusted income has exceeded 120 percent of area median income (AMI) (or a different limitation established by the secretary) for two consecutive years, the PHA must either terminate the family’s tenancy within six months of the determination, or charge the family a monthly rent that is the higher of the applicable fair market rent (FMR) or the amount of monthly subsidy for the unit, including amounts from the operating and capital funds, as determined by regulations. Therefore, the following Over-Income Families policy will be implemented [Page 13-16]:

*At annual or interim reexamination, if a family’s adjusted income exceeds the applicable over-income limit, the CDA will document the family file and begin tracking the family’s over-income status*

*If one year after the applicable annual or interim reexamination the family’s income continues to exceed the applicable over-income limit, the CDA will notify the family in writing that their income has exceeded the over-income limit for one year, and that if the family continues to be over-income for 12 consecutive months, the family will be subject to the CDA’s over-income policies*

*If two years after the applicable annual or interim reexamination the family’s income continues to exceed the applicable over-income limit, the CDA will charge the family a rent that is the higher of the applicable fair market rent (FMR) or the amount of monthly subsidy for the unit. The CDA will notify the family in writing of their new rent amount. The new rent amount will be effective 30 days after the CDA’s written notice to the family*

*If, at any time, an over-income family experiences a decrease in income, the family may request an interim redetermination of rent in accordance with CDA policy. If, as a result, the previously over-income family is now below the over-income limit, the family is no longer subject to over-income provisions as of the effective date of the recertification. The CDA will notify the family in writing that over-income policies no longer apply to them. If the family’s income later exceeds the over-income limit again, the family is entitled to a new two-year grace period*

*The CDA will not evict or terminate the tenancies of families whose income exceeds the income limit for program eligibility as described at 24 CFR 960.261*

*Over-income families are exempt from participating in the Family Self-Sufficiency (FSS) program or from receiving the earned income disallowance*

The CDA will rely on over-income limits, calculated by multiplying the very low-income limit (VLI) by 2.4, as adjusted for family size. The over-income limit will be published on the CDA's website and updated within 60 days of HUD publishing new income limits each year, and will be effective for all annual and interim reexaminations once these policies have been adopted

**Over-Income Limits, as of April 14, 2019**

Family Size	1	2	3	4	5	6	7	8
Over-Income Limit	\$84,360	\$96,480	\$108,480	\$120,480	\$130,200	\$139,800	\$149,400	\$159,120

8. Under Prohibited Activities, the following additional evidence will be added as evidence for consideration of program abuse by CDA Staff [Page 15-10]:
- a. *Committing Sexual harassment or other harassment based on race, color, religion, national origin, familial status, disability, sexual orientation, or gender identity, either quid pro quo (supervisory harassment) or hostile environment*
  - b. *Allowing sexual harassment or other harassment based on race, color, religion, national origin, familial status, disability, sexual orientation, or gender identity, either quid pro quo (supervisory harassment) or hostile environment, where the CDA knew or should have known such harassment was occurring*
  - c. *Retaliating against any applicant, resident, or staff reporting sexual harassment or other harassment based on race, color, religion, national origin, familial status, disability, sexual orientation, or gender identity, either quid pro quo (supervisory harassment) or hostile environment*

**Operation and Management**

**Section 8 Housing Choice Voucher Program Administrative Plan**

1. The CDA will screen all household members for state Sex Offender Registration requirements, including juveniles [Page 3-29]
2. When purging the Section 8 Wait List [Page 4-10]:
 

*The family's response must be in writing and may be delivered in person, by mail, by fax, or by e-mail. Responses must be received by the CDA no later than 15 business days from the date of the CDA update letter (notice)*

*If notice is returned by the post office with or without a forwarding address, the family will be removed from the wait list*
3. If a family is removed from the waiting list because the CDA has determined the family is not eligible for assistance, a notice will only be sent to the family's address of record. The CDA does not keep alternative addresses [Page 4-11].
4. When HUD awards Section 8 housing assistance for a specified category of families, the CDA will select families in the specified categories. In addition to the Family Unification Program (FUP), the CDA will assist families under the Section 8 Moving Up Pilot Program and the Section 8 Mainstream program [Page 4-13].
5. Family Unification Preference definition will be added [Page 4-15]
 

*The Family for whom the lack of adequate housing is a primary factor in either:*

  - *The imminent placement of the family's child(ren) in out-of-home care*
  - *The delay in the discharge of the child(ren) to the family from out-of-home care*

*Youth at least 18 years old and not more than 24 years old who:*

  - *Left foster care at age 16 or older or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act; and*
  - *Are homeless; or*
  - *Are at risk of homelessness*

*An applicant receives a Family Unification Preference when the applicant has been referred to the CDA by an assigned social service partner (e.g. Dane County Human Services).*

6. Mainstream Preference definition will be added [Page 4-15]

*An applicant receives a Mainstream Preference when the family is comprised of one or more non-elderly (age 18-61) person with disabilities (meeting HUD's definition) who previously experienced homelessness and who are currently a client in permanent supportive housing or in a rapid rehousing project:*

*Mainstream Singles:*

*Non-elderly adult (age 18 – 61) with disabilities; and*

*Previously experienced homelessness; and*

*Currently a client living in permanent supportive housing for at least 4 years, or a rapid rehousing project for at least 6-months.*

*Mainstream Families:*

*At least one family household member is a non-elderly adult (age 18 – 61) with disabilities; and*

*Previously experienced homelessness; and*

*Currently a client living in permanent supportive housing for at least 2 years, or a rapid rehousing project for at least 6-months.*

*An applicant receives a Mainstream Preference when the applicant has been referred to the CDA by an assigned supportive housing agency partner (e.g. The Road Home Dane County) who will provide supportive services.*

7. When a family has been selected from the wait list [Page 4-20]:

*If a selection-notification letter is returned to the CDA with or without a forwarding address, the family will be removed from the waiting list*

8. HUD mandates certain exclusions from annual income. The following will be added as exclusions from annual income [Page 6-30]:

- a. *Benefits under Section 1780 of the School Lunch Act and Child Nutrition Act of 1966*
- b. *Deferred disability benefits from the Department of Veterans Affairs, whether received as a lump sum or in monthly prospective months*
- c. *Payments, funds, or distributions authorized, established, or directed by the Seneca Nation Settlement Act of 1990 (25 U.S.C. 1774f(b))*
- d. *A lump sum or periodic payment received by an individual Indian pursuant to the Class Action Settlement Agreement in the United States District Court case entitled Elouise Cobell et al. v. Ken Salazar et al., for a period of one year from the time of receipt of that payment as provided in the Claims Resolution Act of 2010*
- e. *Any amounts in an "individual development account" as provided by the Assets for Independence Act, as amended in 2002.*
- f. *Amounts of scholarships funded under Title IV of the Higher Education Act of 1965j, including awards under federal work-study programs or under the Bureau of Indian Affairs student assistance programs (20 U.S.C. 1087uu). For Section 8 programs, the exception found in § 237 of Public Law 109–249 applies and requires that the amount of financial assistance in excess of tuition and mandatory fees shall be considered income in accordance with the provisions codified at 24 CFR 5.609(b)(9), except for those persons with disabilities as defined by 42 U.S.C. 1437a(b)(3)(E) (Pub. L. 109–249) (See Section 6-I.L. for exceptions.)*
- g. *Payments made from the proceeds of Indian tribal cases as described in Notice PIH 2013-30, "Exclusion from Income of Payments under Recent Tribal Trust Settlements" (25 U.S.C. 117b(a))*
- h. *Major disaster and emergency assistance received under the Robert T. Stafford Disaster Relief and Emergency Assistance Act and comparable disaster assistance provided by states, local governments, and disaster assistance organizations*
- i. *Distributions from an ABLÉ account, and actual or imputed interest on the ABLÉ account balance, as required under the Achieving a Better Life Experience Act of 2014 (ABLE Act)*

9. A Section 8 program participant who is not receiving any subsidy, but whose HAP contract is still in force, may request a voucher to move to a different unit. The PHA must issue a voucher to move unless it has grounds to deny assistance under the program regulations. However, if the PHA determines no subsidy would be paid at the new unit, the PHA may refuse to enter into a HAP contract on behalf of the family. Therefore, the CDA will implement the following policy [Page 10-8]:

*If a zero HAP family requests to move to a new unit, the family may request a voucher to move. However, if no subsidy will be paid at the unit, which the family requests to move to, the CDA will not enter into a HAP contract on behalf of the family for the new unit*

10. STATEMENT OF FAMILY OBLIGATIONS states the CDA will determine if a family has committed serious or repeated violations of the lease based on available evidence, including but not limited to, a court-ordered eviction or an owner's notice to evict. Additional evidence for consideration will include [Page 12-25]:

*police reports, and affidavits from the owner, neighbors, or other credible parties with direct knowledge*

11. In determining owner program abuse, the following additional evidence will be considered [Prohibited Owner Actions, Page 14-12]:

*Committing sexual or other harassment, either quid pro quo or hostile environment, based on the protected classes*

*Retaliating against any applicant or participant reporting/alleging sexual or other harassment, either quid pro quo or hostile environment, based on the protected classes*

### **Homeownership Programs**

The CDA intends to submit its draft Section 32 Homeownership Plan to HUD per CDA Board approval in 2018. The plan includes 12 scattered-site housing units, which would be available for purchase by low-income families. The CDA would use the proceeds of any sale for redevelopment of new affordable housing. The CDA may also form partnerships with non-profit and private developers to increase the opportunities for affordable home ownership through community efforts that include for-sale affordable and mixed-income housing production.

### **Community Service and Self-Sufficiency Programs**

The CDA will continue to administer the Resident Opportunities and Self-Sufficiency (ROSS) program, Multifamily Housing Service Coordinator grant program, and Housing Choice Voucher Family Self-Sufficiency (FSS) program. The CDA may pursue other self-sufficiency opportunities, such as a HUD Moving-To-Work designation, increasing Section 3 program efforts, and creating internship positions within the agency. The CDA may also apply for Capital Fund Community Facilities Grants, and other related grants, for the construction, rehabilitation, or purchase of facilities to provide early childhood education, adult education, and/or facilities offering comprehensive integrated services for residents.

### **Asset Management**

In an effort to expand the supply and improve the quality of assisted housing, the CDA will:

- Assess its current inventory of Public Housing to identify potential for redevelopment, including mixed-finance development or through a Choice Neighborhood Initiative funding option
- Develop a site-by-site preservation strategy
- Maintain a housing development plan for the demolition or disposition of one or more functionally obsolete units, the construction of new units, and the strategic acquisition and preservation of existing affordable properties.
- Leverage private financing for developing new dwelling units within HUD guidelines
- Work with the Department of Housing and Urban Development to increase the number of occupied housing units in the CDA's portfolio, including re-occupying modernized and vacant units
- Convert Public Housing subsidy platform to a more stable funding stream, such as a project-based Section 8 platform, either through Section 18, or through HUD's Rental Assistance Demonstration (RAD) program
- Demolish or dispose of obsolete Public Housing units and provide sustainable replacement housing



**Financial Resources**

<b>CDA Financial Resources</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>Federal Grants (2019)</b>		
➤ <b>Public Housing Operating Fund</b>	\$1,348,692	
➤ <b>Public Housing Capital Fund</b>	\$1,676,350	
➤ <b>Section 8 Housing Assistance Payments</b>	\$14,324,043	
➤ <b>Section 8 Administrative Fund</b>	\$1,247,166	
➤ <b>Multifamily Housing Assistance Payments</b>	\$593,154	
➤ <b>Section 8 Family Self-Sufficiency Grant</b>		Section 8 FSS Program Services
➤ <b>Multifamily Housing Service Coordinator Grant</b>	\$154,580	Multifamily Resident Services
➤ <b>Public Housing Resident Opportunities and Self-Sufficiency Grant (3 Year Grant)</b>	\$77,303	Public Housing Resident Services
<b>Prior Year Federal Grants (Unobligated Funds Only)</b>	\$ -0-	Public Housing Capital Improvements
<b>Public and Multifamily Housing Dwelling Rental Income</b>	\$3,365,473	Public Housing and Multifamily Housing Operations
<b>Other Non-Dwelling Income</b>	\$377,942	Public Housing and Multifamily Housing Operations
<b>Non-Federal Sources</b>		
➤ <b>City of Madison General Fund</b>	\$175,000	PHA Operations

(c) The PHA must submit its Deconcentration Policy for Field Office review.

**Deconcentration Policy**

The CDA will determine the average income of all families in all covered developments on an annual basis. The CDA will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis. For developments outside the Established Income Range (EIR) the CDA will take the following actions to provide for deconcentration of poverty and income mixing:

- Provide incentives to encourage families to accept units in developments where their income level is needed, including rent incentives or added amenities. The CDA may offer one or more incentives for a particular development. Various incentives may be used at different times, or under different conditions, but will always be provided in a consistent and nondiscriminatory manner
- Identify any impediments to fair housing within the program and use affirmative marketing plans to encourage families to accept units in developments where their income level is needed
- Target investment and capital improvements toward developments with an average income below the established income range (EIR) to encourage families with incomes above the EIR to accept units in those developments
- Skip a family on the waiting list to reach another family with income above the EIR. Skipping families for deconcentration purposes will be applied uniformly to all families. A family will have the sole discretion whether to accept an offer of a unit made under the CDA’s deconcentration policy. The CDA will not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the CDA’s deconcentration policy. However, the CDA will uniformly limit the number of offers received by applicants [and transfer families] as described in the CDA’s Admissions and Continued Occupancy, Tenant Selection, policy
- Assign transfers for a designated project that will contribute to the CDA’s deconcentration goals
- Provide other strategies permitted by statute and determined by the CDA in consultation with the community through the annual plan process to be responsive to local needs and CDA strategic objectives

**New Activities.**

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

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

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

The CDA intends to assess its current inventory of housing to identify potential for redevelopment, including mixed-finance development or through a Choice Neighborhood Initiative funding option. The CDA will develop a site-by-site preservation strategy; and maintain a housing development plan for the demolition or disposition of one or more functionally obsolete units, the construction of new units, and the strategic acquisition and preservation of existing affordable properties. The CDA may leverage private financing for developing new dwelling units within HUD guidelines. The CDA intends to utilize Capital Funds for redevelopment when appropriate. The CDA intends to convert its Public Housing subsidy platform to a more stable funding stream, such as a project-based Section 8 platform, either through Section 18, or through HUD’s Rental Assistance Demonstration (RAD) program. A conversion may include all Public Housing units within the CDA’s inventory.

The CDA may demolish or disposition one or more Public Housing units or an entire development or portion of a project if the CDA finds the unit(s) to be functionally obsolete as to physical condition, location, or other factors that would cause the Public Housing to be unsuitable for housing purposes, and no reasonable program modifications would be cost-effective to return the particular Public Housing unit(s) to its useful life. The CDA may also pursue demolition or disposition if changes in neighborhood or location adversely affects the health or safety of CDA residents or feasible operation by the CDA, and disposition will allow the acquisition, development, or rehabilitation of other properties that will be more efficiently or effectively operated as lower income housing and that will preserve the total amount of lower income housing stock available in the community.

The CDA will focus on income generating opportunities and pursue renovation and rehabilitation of CDA Public Housing through available funding, including Capital Funds, Hope VI, Choice Neighborhoods, Tax Credit programs, and Rental Assistance Demonstration conversions or other available conversion options. Such efforts may involve partnerships with private and non-profit developers to increase affordable housing for Mixed Finance Modernization or Development.

The CDA's Long Range Planning Committee recommended redevelopment and/or replacement of existing CDA Public Housing, and the CDA will continue to follow those recommendations, as well as continue to identify sites for renovation or disposition. Potential sites for renovation and rehabilitation include, but are not limited to Truax, Baird Fisher, Webb Rethke, The Triangle, Romnes Apartments, and Scattered Site East and West Housing. Developments specifically targeted for new activities in 2020 include:

- Four (4) units of Public Housing located on Theresa Terrace, have been identified as functionally obsolete and remain vacant since 2015. These units are located in a neighborhood with concentrations of poverty. The CDA intends to either disposition these units or redevelop as part of a strategy to create quality, low-income housing for residents in the existing neighborhood. These units are in the AMP 300 inventory.
- 32 scattered site units at the CDA's East and West Sites are also being considered for a Section 18 disposition. These units are mostly duplexes and four-plexes and meet the 18-04 scattered site definition. The units would be sold to a CDA created non-profit at less than fair market value and would be maintained as affordable housing through a restricted use covenant. The Public Housing subsidy would be replaced with Section 8 Tenant Protection Vouchers. Four (4) units are in the AMP 200 inventory, and 28 units are in the AMP 300 inventory.
- 12 single-family homes within the CDA's West Site (AMP 300) inventory have been identified for disposition. The CDA is reviewing several strategies which may include the Section 32 homeownership program for low-income residents, or a Section 18 disposition to a non-profit provider of low-income homeownership.
- 48 units remain at Truax Park Apartments for development. These units are part of the AMP 200 inventory and were former Air Force family housing in multi-story brick/concrete buildings. These units are at the end of their useful life, with no elevator or air conditioning and limited amenities. The units are also not accessible. Therefore, the CDA will pursue a Section 18 application if the CDA can demonstrate the total development cost (TDC) meets HUD's TDC limit.
- Pursuant to the CDA's Master Plan and Site Development Study, Truax Park Apartments Redevelopment Phase 3 plans may be created. Under AMP 200, the Public Housing inventory consists of the 48 remaining barracks buildings (as noted above) and 28 units on Wright Street (known as "A" Site). The CDA may also reposition this Public Housing through a Rental Assistance Demonstration (RAD) conversion.
- The CDA's Triangle Site includes 60 Public Housing units at Gay Braxton Apartments and 162 Public Housing units at Brittingham Apartments. These units are within the AMP 400 inventory. After receiving input from residents, the CDA will begin the process of redeveloping the Triangle, with a Low-Income Housing Tax Credit application submitted in 2021, construction to begin in 2022, and occupancy by current residents by 2023. The CDA may also reposition this Public Housing through a RAD conversion or through a Section 18 disposition.

The CDA will collaborate with HUD to increase the number of occupied Public Housing units in the CDA's portfolio, including re-occupying modernized and vacant units. Units undergoing modernization require the unit to become vacant to accomplish the capital improvements. Once the work (requiring the unit to be vacant) has been completed, the unit can be re-occupied by an eligible family.

With supporting data and where appropriate, the CDA may designate housing for elderly and/or disabled families.

The CDA intends to utilize its updated policy to address over-income families in the Public Housing program (See Page 5 - 6)

	<p>As a subcomponent of the CDA’s Section 8 tenant-based assistance program, the CDA has established a Section 8 Project-Based Voucher (PBV) program to further its overall housing strategy. The CDA will continue to use PBVs and explore options where PBVs may be used in developing affordable housing and for special needs housing. The CDA will also exercise a moratorium on the right to move under the PBV program, should Section 8 utilization reflect such need.</p> <p>The CDA will continue to apply for additional program funding or other funding, as notifications of funding availability (NOFA) announcements are made. The CDA may pursue a Choice Neighborhoods grant or submit an application for other Capital Grant programs, including the Capital Fund Community Facilities Grants (CFCF) and the Capital Fund Emergency Safety and Security Program. If granted, CFCF would provide capital funds to the CDA for the construction, rehabilitation, or purchase of facilities to provide early childhood education, adult education, and/or job training programs for CDA Public Housing residents. The CDA may also use CFCF program funds to rehabilitate existing community facilities that will offer comprehensive integrated services to help CDA Public Housing residents achieve better educational and economic outcomes resulting in long-term economic self-sufficiency. If granted, the Capital Fund Emergency Safety and Security Program funds would provide the CDA with support in addressing safety and security threats posing a risk to the health and safety of Public Housing residents.</p>
<p><b>B.3</b></p>	<p><b>Civil Rights Certification.</b></p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>See attached HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations</p>
<p><b>B.4</b></p>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/>  X <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p><b><u>Internal Control Over Financial Reporting</u></b></p> <p>Auditor evaluation of the internal controls over financial reporting has identified control deficiencies that are considered material weaknesses surrounding the preparation of complete and accurate financial statements and footnotes, adjusting journal entries identified by auditors, and an independent review of financial reports. For purpose of the 2018 financial audit, management has not prepared a complete set of financial statements that are in conformity with generally accepted accounting principles and material adjustments were identified during the audit process. Management should consider what resources and changes are necessary to address and resolve the control deficiencies identified.</p> <p><b><u>Management Response</u></b></p> <p>City of Madison Finance Staff are currently working on a Comprehensive Annual Financial Report (CAFR) build using software procured earlier in the 2018. Finance Staff anticipate rolling forward the 2018 CAFR to begin mapping for 2019. The City’s first electronic version of the entity-wide financial statements with reconciliations to the fund statements, cash flow financial statements, footnotes, and other supporting schedules are planned for completion in 2019.</p> <p>Additionally, City Finance Management Staff formally reviews the fund financial statements prior to external audit teams’ arrival. During these formal reviews, Staff highlight and discuss significant account variations between years, to help identify material misstatements. In 2018, City Finance Management Staff implemented a formal month-end close process citywide, to further assist staff with projections, timely account analysis, and transactional completion for financial statement purposes.</p> <p>In 2019, City Accounting Supervisors began to sample high dollar transactions quarterly, to ensure account propriety, accurate recording within the general ledger, and to promptly identify any required journal entries and/or reclassifications prior to year-end close and external audit team arrival.</p>

**B.5 Progress Report.**

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

**2015 – 2019 Goals and Progress**

**Increase and Expand the Supply of Assisted Housing**

The CDA continued to lease, manage, and maintain 764 units of Public Housing, 115 units of Multifamily Housing, and 24 Project-Based units at its East, West, and Triangle developments. Pursuant to a 2009 Master Plan and Site Development Study, Truax Park Apartments began redevelopment under Phase 1 in 2011, with 71 remodeled units completed; and Phase 2 completed in 2015, with 40 new units of Public Housing. The CDA remains 8 units over the Fair Cloth limit.

After Public Housing tenants moved from their old units into new units at Truax Phase 2, the CDA repurposed 28 units of Public Housing at its “A Site” for use as Rapid Re-Housing for one year, through a partnership with the Road Home of Dane County. In 2018, the CDA modernized “A Site” utilizing Capital Funds, and then rented as Public Housing. This activity resulted in a negative shift in occupancy in the years 2015 and 2016 for the CDA’s East Site (AMP 200).

The CDA dispositioned one (1) unit of Public Housing in 2017, at Marconi Street, due to the unit being in severely damaged condition and repairs being beyond the total development costs to bring the unit to functional use. Habitat for Humanity purchased the Marconi Street unit; and Habitat rehabbed the unit and sold it to a low-income family. The CDA will use the proceeds from the sale of Marconi for future redevelopment of Public Housing.

In 2017, the CDA identified Four units of Public Housing, at Theresa Terrace, as functionally obsolete. These units are located in a neighborhood with concentrations of poverty. The CDA intends to either sell these units or redevelop as part of a strategy to create quality, low-income housing for residents in the existing neighborhood.

The City of Madison adopted a draft [Triangle Monona Bay Neighborhood Plan](#) in 2019 with input from area residents, service providers, property owners, and other stakeholders. An Ad Hoc Steering Committee participated in the neighborhood planning process, with a CDA housing resident on the Steering Committee. The plan also received input from the CDA Board of Commissioners. The plan provides guidance as the CDA begins to address redevelopment needs at the Triangle Site.

On October 11, 2018, the CDA Board adopted a Section 32 Homeownership Plan for submission to the HUD Special Applications Center. The plan includes 12 scattered-site housing units, which would be available for purchase by low-income families. The CDA would use the proceeds of any sale for redevelopment of new affordable housing. The Plan has not yet been submitted to HUD.

The CDA implemented a policy for over-income Public Housing tenants, including an income limit formula and a time-period of two years to track the income level at annual or interim reexamination. To date, the CDA has not identified any families who are over-income.

New admissions for the CDA’s Section 8 Housing Choice Voucher Program are as follows:

2015	2016	2017	2018	June of 2019	Total
117	40	0	29	16	202

The CDA awarded Section Project-Based Voucher (PBV) contracts and continues to maintain existing PBV contracts:

Contract Year	Organization	Program Criteria for Low-Income Households	PBVs Awarded
2006	Housing Initiatives	Housing with mental health supportive services	5
	Porchlight, Inc.	Homeless or formerly homeless	8
	Prairie Crossing	Allied Drive Neighborhood revitalization	20
	YWCA	Single Mom’s with 1 or 2 children under the age of 4	8
2008	Revival Ridge	Neighborhood revitalization	36
2010	Burr Oaks	Senior affordable housing	30
	Truax Park	Truax Park Redevelopment Phase 1	24
2014	Pinney Lane	For Persons with Disabilities	8
	Porchlight at Truax	Truax Park Development Phase 2	8
	Rethke Terrace	Permanent supportive housing for homeless individuals	27
	Ridgecrest	Private redevelopment of distressed affordable housing	8
2015	Tree Lane	Permanent supportive housing for homeless families	20
<b>TOTAL for 2019</b>			<b>202</b>

The CDA's voucher baseline increased from 1,606 in 2006 to 1,910 in 2019, as the CDA continued to receive new allotments of vouchers under the Family Unification Program (FUP) and the Veterans Affairs Supportive Housing (VASH) program. The CDA continues to maintain its Section 8 FUP and VASH programs.

Each year the CDA reviewed its Section 8 payment standards taking into account the supply of rental housing available within the payment standards and the success rate of participating families finding suitable housing. HUD allows Section 8 payment standards to be between 90% and 110% of HUD's annual Fair Market Rents (FMR). In 2016, the CDA lowered its payment standards to allow the maximum number of families to receive Section 8 assistance. In 2017, the payment standards were increased to remain within the basic range; and in 2019, the payment standards were increased to allow assisted households to find housing in a tight rental market:

Date	Resolution No.	Percentage Change
10/23/2014	4106	106% of 2015 HUD FMR
5/12/2016	4185	102% of 2016 HUD FMR
9/14/2017	4241	90% of 2018 HUD FMR
5/10/2018	4269	95% of 2018 HUD FMR

In November of 2018, the CDA entered into a Section 8 Moving Up Pilot Program (MUPP) Memorandum of Understanding with the Road Home of Dane County for the referral and implementation to move 10 families out of Permanent Supportive Housing while maintaining affordable housing and receiving transitional support services for two years. To date, five (5) families have leased up and one (1) family is shopping for a rental unit.

In 2019, HUD awarded 45 Section 8 vouchers to the CDA under the Mainstream Voucher Program. The Mainstream Voucher Program intends to integrate non-elderly persons with disabilities into the community, including connections to local health care providers. The CDA will utilize service partners to identify qualified individuals currently on the CDA's Section 8 wait list, provide direct referrals of new applicants, verify disability, support applicants, provide housing search assistance, and deliver support services after move-in. The CDA will begin the referral process in 2020 by opening its Section 8 wait list to Mainstream qualified applicants.

#### **Improve Quality of Assisted Housing and Quality of Life**

The CDA continues to maintain two (2) HUD Multifamily Housing Service Coordinator grants, which includes two (2) Resident Service Coordinators at the CDA's Triangle Site. The Resident Service Coordinators assess the needs of elderly and disabled residents and coordinate available supportive services to improve living conditions, so that those residents can continue to live in place, independently.

In 2018, and with the assistance of the Madison and Dane County Public Health Department, the CDA implemented a "Smoke Free Housing" policy at each of its Public and Multifamily Housing developments

The Area Agency on Aging and Dane County Department of Human Services applied for an Administration of Community Living (ACL) grant of \$1 million, with the intention of partnering with the CDA, for supportive services to persons living alone with Alzheimer's and related dementias. These wrap around services were targeted for the CDA's Triangle Site. This grant was not awarded to the CDA.

In 2017, the CDA pursued Capital Fund Emergency Safety and Security (ESS) Grant funding of \$250,000. The grant application submitted to HUD, was based on the identified areas of Truax, Webb/Rethke and Romnes Public Housing sites, where the incidence of crime has increased. The CDA targeted the use of ESS funds to support the installation of security cameras and associated equipment. The CDA did not receive an award for the Capital Fund ESS grant.

The CDA applied for the American Transmission Company Community Planting Program in September 2018; and the CDA was awarded \$3,751 of grant funding to purchase and plant trees at its Public Housing sites. The CDA will work with the Urban Tree Alliance to evaluate planting needs for 2019.

The CDA continues to review a streamlined income determination policy and process for Public Housing families with a fixed source of income. The Section 8 program has opted out of this HUD regulation, as it is discretionary.

#### **Promote Self-Sufficiency of Families and Individuals**

The CDA continues to administer a Section 8 Homeownership Option. To date, the CDA has 38 active Section 8 homeownership clients, with two (2) Section 8 families expected to close on their new home in July and August.

The CDA continues to maintain a Section 8 Family Self-Sufficiency (FSS) program in partnership with the Dane County Housing Authority and with services provided by the Community Action Coalition for South Central Wisconsin. The CDA's goal is to support 13 families through the FSS program. Since the program began in 2010, FSS activity is as follows:

<b>Total FSS Activity</b>	<b>Currently Active in FSS</b>	<b>Completed FSS Program</b>	<b>Terminated from FSS</b>
37	12	9	16

The CDA was awarded the Federal Fiscal Year 2015 and FFY 2018 Resident Opportunity and Self-Sufficiency (ROSS) grants. A ROSS Service Coordinator was also hired in 2016, and this position continues to provide supportive services for self-sufficiency to residents of the CDA's East and West Site developments.

In 2015, the CDA joined the City of Madison Department of Civil Rights, the Dane County Department of Civil Rights, and the Dane County Housing Authority to create a Section 3 Guidebook. The CDA continues to meet Section 3 requirements as set by HUD, including annual reporting. In 2018, CDA Staff received Section 3 certification training and conducted an inventory of current contracts, updated procurement policies, and updated the CDA's request for proposal template. The CDA continues to post internal job opportunities at its Public Housing developments.

**Ensure Equal Opportunity**

The CDA created a Hearing Examiner and Reasonable Accommodation Specialist position through its 2019 Operation Budget and the City of Madison Human Resources Department will be studying the position to determine the appropriate personnel classification and level of pay. This position will ensure that families receive a fair hearing in a timely manner, and will be responsible for processing reasonable accommodation requests for person with disabilities.

A CDA Public Safety Officer staff position was also created in the CDA's 2019 Operating Budget. City of Madison Human Resources completed a study of the position and they are working with the CDA on the recruitment process. As a community resource, and in using racial equity and social justice principles, the Public Safety Officer will educate, problem solve, and provide support to elderly and disabled residents at the CDA's Triangle Site, where traditional security services are unneeded.

All new CDA employees attend Fair Housing training and many CDA Staff have attended the City of Madison's Racial Equity and Social Justice Initiative series of trainings. The CDA's Civil Rights Coordinator continues to manage the CDA's affirmative action Work Force Plan, as well as annual updates to the Work Force Plan. The CDA Civil Rights Coordinator also serves as an agency liaison to the City of Madison for "red flag" staff positions; assists with Prohibited Harassment and/or Discrimination training and complaint investigations; ensures all CDA Staff have access to language-line services, translation, and interpretation services; identifies equity training needs within the CDA; and supports the Multicultural Affairs Committee, Women's Initiative Committee, and Latino Community Engagement Team by reaching out to CDA employees of color and women for active participation on these teams.

**Violence Against Women Act (VAWA)**

In 2017, the CDA implemented key VAWA changes, which expand housing protections to victims, including the addition of "sexual assault" as a crime covered by VAWA; established emergency transfer policies for its housing programs; and revised policy documents, lease addendums, and VAWA notices and forms. The CDA continues to follow VAWA provisions and continues to provide a Section 8 wait list preference for Victims of Domestic Violence. The CDA also provides outreach on VAWA protections, by notifying applicants and program participants of their rights under VAWA, including VAWA language in the CDA's Section 8 Housing Assistance Payment (HAP) Contract and CDA leases for Public Housing and Multifamily Housing, and featured VAWA information on the CDA's Website including victim resource resources and CDA VAWA forms.

**B.6 Resident Advisory Board (RAB) Comments.**

(a) Did the RAB(s) provide comments to the PHA Plan?

Y N  
X

(c) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.

**Resident Advisory Board (RAB) Meeting - August 23, 2019**

**RAB Members Present:** Sariah Daine and LaQuella Etchin

**CDA Staff Present:** Lisa Daniels, Bennett Hogendorn, and Deborah Rakowski

**Presentation**

A presentation on the CDA's Draft PHA 5-Year Plan for 2020 – 2024, and Annual Plan for Fiscal Year 2020, was provided to the RAB

**RAB Questions and Comments**

**1. PHA Annual Plan Element Revisions (Attachment A)**

**a) What is an ABLER Account, and who would have an ABLER Account? (Page 02)**

*CDA Response: Able stands for Achieving a Better Life Experience (2014 ABLER Act). An ABLER account is established by someone for a disabled beneficiary, with money added to the account to cover disability related expenses. The CDA is now required by HUD to exclude income from an ABLER account from the annual income calculation.*

**b) The length of the grace period for over-income families is too long. From the perspective of other families, having to pay market price for rent while waiting for a subsidized unit, while over-income families can continue to be under contract (Page 05 – 06).**

*CDA Response: There is the option to terminate the family vs. allowing the family to stay in the unit with fair market rent charged.*

**c) Section 8 Participants are given a six-month grace period before termination. Could the same policy apply when they want to move during the six-month timeframe? (Page 08)**

*CDA Response: If a Section 8 Participant under a housing assistance payment (HAP) contract paying zero assistance moves, the CDA will not enter into a new HAP contract because a housing authority cannot enter into a HAP contract for families who do not have a low-income. The original or current HAP contract would not be terminated before the six-month grace period, but the voucher holder could not move to a new contract unit.*



**Resident Advisory Board (RAB) Meeting - August 30, 2019**

**RAB Members Present:** Lenora Beem, Sariah Daine, Janice England, LaQuella Etchin

**CDA Staff Present:** Lisa Daniels, Deborah Rakowski, and Mark Zeimann

**Presentation**

A presentation on the CDA's Capital Fund Plans was provided to the RAB, which included an overview of Capital Fund Program (CFP) and what kind of capital projects the CDA spends CFP funds on.

**RAB Questions and Comments**

**1. PHA Annual Plan Element Revisions (Attachment A)**

**a) What is design day temperature? (Page 05)**

*CDA Response: Within the new minimum heating requirements, design day temperature is the climate design conditions. For heating systems, this is the maximum conditions that a heating system is designed to accommodate and maintain the desired indoor temperature.*

**2. Capital Fund Program 5-Year Action Plan (Attachment G)**

**a) For the Capital Fund Statements, what is an AMP and who manages which AMP?**

*CDA Response: AMP stands for Asset Management Project, and the CDA has the following five (5) AMPS and Site Managers:*

- *AMP 200 has an inventory of Public Housing units within the City of Madison's East Side, including Truax Park Apartments, Tenney Park Apartments, and units on Williamson, Stein, and Thompson streets. June Garvin is the Site Manager.*
- *AMP 300 has an inventory of Public Housing units within the City of Madison's West and Southwest Side, including Romnes, Baird Fisher, and many other scattered sites. Liz Yszenga is the Site Manager.*
- *AMP 400 has an inventory of Public Housing units at the City of Madison's Triangle Site where Washington, Regent, and Park Street intersect, and includes Brittingham and Gay Braxton Apartments. Lauren Andersen is the Site Manager.*
- *AMP 500 has an inventory of Public Housing units at Truax Park Apartments, which were remodeled in 2011. June Garvin is the Site Manager.*
- *AMP 600 has an inventory of Public Housing units at Truax Park Apartments, which were newly built in 2015. June Garvin is the Site Manager.*

**b) Are residents held accountable if they start a fire in their unit?**

*CDA Response: Yes*

**c) For the Trash Lift work at Romnes, is there recycling?**

*CDA Response: Yes. Residents place their recycling in a container outside the building.*

**d) Under "General Description of Major Work Categories," what is on-demand?**

*CDA Response: Funds used for emergency Capital expenses such as a failed heat exchanger.*

**e) When is flooring replaced at Brittingham?**

*CDA Response: As residents vacate and the CDA prepares to turnover the unit, the flooring may need to be replaced using Capital Funds.*

**f) The large elevator at Brittingham is very bumpy when you ride in it.**

*CDA Response: We will report this to the Site Manager to look into.*

**CDA Resident Advisory Board (RAB) Meeting – September 5, 2019**

**RAB Members Present:** Lenora Beem, John Beeman, and Sariah Daine

**CDA Staff Present:** Tom Conrad, Lisa Daniels, Bennett Hogendorn, Kim Kennedy, and Deborah Rakowski

**5-Year Plan Comments**

**1. The RAB inquired about problem tenants at Tree Lane.**

*CDA Response: Tree Lane and Rethke are owned by Heartland LLC who also manage the properties. The CDA is not the landlord, but has provided Section 8 vouchers at the properties to subsidize the rent. Residents cannot be forced to accept the supportive services provided there. Part of the management issues involve previous “hanger-ons” who followed the new residents to the property. Individuals causing troubles are often times not the residents. Property management staff was also covering both sites at the same time. The property is doing better now.*

**2. The RAB confirmed the same issues with visitors to be present at Brittingham apartments.**

*CDA Response: Security is very important and should be stressed to other residents. It is important to let the Triangle property management staff know of those issues, and the CDA will look into this.*

**3. Is there tree replacement if removing Ash Trees?**

*CDA Response: The CDA obtained a tree grant through the Urban Tree Alliance to replace 40+ trees with a variety of trees.*

**4. The RAB stated they are glad to hear the trees are of a variety.**

**5. The RAB inquired about CDA’s capacity to provide internet to the properties.**

*CDA Response: There are connectivity issues. The City brought wiring to the buildings, but is not allowed to provide internet services. There is a plan to study this issue within the City of Madison for a future plan to implement internet. Also, some buildings have infrastructure that is too old to wire for internet. The City has a contract with Charter to provide internet to the Library. ConnectUSA&EveryoneOn.org provides resources and lists all the low cost internet provider options.*

**6. What is “Equity in Organizational Values?”**

*CDA Response: Making sure we are not leaving anyone behind in how the CDA operates. Internally, we hold equity values in our work and for our employees. It is important for the CDA to use an equity lens in everything we do as a value.*

**7. The RAB would like to see employment opportunities for Seniors.**

*CDA Response: The newly created position of Resident Services Aide at Romnes may be able to work on those initiatives.*

**8. Some residents are still smoking in their apartments, which is affecting other residents with chronic health problems. How is this handled?**

*CDA Response: HUD says to enforce these rules “gently”. Therefore, the CDA uses a 5-step warning process for intervention. The percentage of smokers is relatively low since implementing the smoking ban, and most smokers work within the guidelines (i.e. smoking off the property).*

**PHA Annual Plan Comments**

**1. Over-income families have too long of a grace period.**

*CDA Response: Housing Authorities are required to give a 2-year grace period once the resident’s adjusted income exceeds applicable over-income limits. We have to have a policy that either evicts the family or allows the family to stay and pay fair market rent. It may de-motivate individuals or families from trying to increase their own income out of fear of losing assistance because of a short grace period or turnover. There would be an increase between subsidized rent and the HUD determined fair market rent. If evicted, there would be a very large jump to private market rate rent with other benefits lost at that point as well (i.e. childcare, food share, etc.)*

**2. How do Assets count towards Re-Certifications and Rent?**

*CDA Response: Interest on the asset would be counted as income. Therefore, even large assets ultimately do not add significant amounts to voucher holder’s rent amount.*

**3. Is Sex Offender Screening new?**

*CDA Response: No. The CDA has screened all adults in the household. The new policy would include the screening of minors for lifetime sex-offender registry requirements, as recommended by HUD. It is important to screen individuals up front before they move in, as the CDA cannot evict someone based on being on the lifetime sex-offender registry once the individual has already moved in.*

**Capital Funds Program Comments**

**1. How do we know when and how much funds we are receiving?**

*CDA Response: The funds are provided through an amendment to the current contract. When and how much changes from year to year. Since we are prioritizing old grant funds, it is not vital to know when we will receive new grant funds.*

**2. The outside of the windows should be cleaned at the Triangle.**

*CDA Response: Capital Funds could not be used for cleaning, but Staff will look into this.*

**Facilitating Contact with Residents**

1. The CDA asked the RAB to consider ways in which the CDA could help the RAB provide more consistent outreach to residents. The RAB provided the following comments on using Surveys:

- Current surveys feel too dense and lengthy for individuals to realistically complete.
- Surveys could be provided as an optional addition to the Section 8 Re-Certification paperwork.
- Experiment with different methods of sending out surveys (i.e. online vs. paper vs. in person).

2. The RAB and CDA Staff discussed ways to facilitate contact with residents:

- Monthly board meetings notices should be posted at sites.
- Posting notes publicly in accessible areas to start conversations.
- “Meet your RAB member” in newsletter to program participants could help get the word out.
- Coffee hour? “Meet and Greet RAB members.”
- Incentivize tenants with food and refreshments.

**September 2, 2019 Comments Received From Resident Advisory Board Member, LaQuella Etchin:**

**1. How can Section 8 participants be made aware of the Section 8 Homeownership program? She recommends a brochure be placed in the waiting room at the Central Office.**

*CDA Response: The CDA will look into ways to promote its homeowners programs, including brochures in waiting area, and on CDA website and lobby monitor.*

**2. At the Public Housing lease signing appointment, it is not made clear that the site office is the landlord and who to contact if there is an issue. Maintenance information was made clear, but it was not clear who to contact if you had an issue with a neighbor, etc.**

*CDA Response: Site Managers will be asked to look into how contact information is communicated during the lease-up procedure with new residents.*

	<p><b>CDA Resident Advisory Board (RAB) Meeting – March 10, 2020</b></p> <p><b>RAB Members Present:</b> John Beeman, Sariah Daine, LaQuella Etchin</p> <p><b>CDA Staff Present:</b> Lisa Daniels Deborah Rakowski</p> <p><b>2020 Annual Plan Discussion and Comments:</b></p> <p><b>1. Section 18 Disposition Application</b></p> <p><i>Deb Rakowski provided an overview of the state of Public Housing, Section 18 Basics, Timeline, and Resident Impact.</i></p> <p><i>RAB Comment: Why is funding low?</i></p> <p><i>CDA Response: Congress appropriates funding</i></p> <p><i>RAB Comment: Will there be Public Housing at Romnes?</i></p> <p><i>CDA Response: Yes, Public Housing will continue to remain at Romnes</i></p> <p><i>RAB Comment: Will existing tenants get the first voucher after conversion?</i></p> <p><i>CDA Response: Yes, the tenants currently living in the Public Housing units to be converted to a Section 8 subsidy, will receive the voucher</i></p> <p><i>RAB Comment: If a tenant then moves with their voucher after a year, rents from a private landlord, and the landlord changes their mind or doesn't renew their lease, will the tenant lose the voucher?</i></p> <p><i>CDA Response: No, the tenant will find another unit to rent with the voucher.</i></p> <p><b>2. Section 8 Mainstream Program</b></p> <p><i>Lisa Daniels explained the CDA's new Mainstream program.</i></p> <p><i>RAB Comment: Will Mainstream be Section 8 funded.</i></p> <p><i>CDA Response: Yes, Mainstream is funded with Section 8</i></p>
<p><b>B.7</b></p>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>See attached HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</p>
<p><b>B.8</b></p>	<p><b>Troubled PHA.</b></p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?  Y N N/A  <input type="checkbox"/> X <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p><b>C.</b></p>	<p><b>Statement of Capital Improvements.</b> Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p> <p>See attached HUD-50075.1, Annual Statement/Performance and Evaluation Reports</p>
<p><b>C.1</b></p>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>See attached HUD 50075.2, Capital Fund Program Five Year Action Plan approved by HUD on 5/18/2018</p>