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

U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires: 03/31/2024

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

**Applicability.** The 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 <u>both</u> 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, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 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 exceed 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.

| Α.  | PHA Information.   |                      |                                     |                        |                 |                |  |  |  |  |
|-----|--|----------------------|-------------------------------------|------------------------|-----------------|----------------|--|--|--|--|
| A.1 | PHA Name: Community Dev  | elopment Auth        | ority, City of Madison              | PHA Code: WI-003       |                 |                |  |  |  |  |
|     | PHA Type: ⊠ Standard PHA ☐ Troubled PHA  |                      |                                     |                        |                 |                |  |  |  |  |
|     | PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/2024   |                      |                                     |                        |                 |                |  |  |  |  |
|     | PHA Inventory (Based on Ar   | nual Contributi      | ons Contract (ACC) units at time of | f FY beginning, above) |                 |                |  |  |  |  |
|     | Number of Public Housing (   | PH) Units <u>740</u> | Number of Housing Choice            | Vouchers (HCVs): 2,140 |                 |                |  |  |  |  |
|     | Total Combined Units/Vouc  | hers <u>2,880</u>    |                                     |                        |                 |                |  |  |  |  |
|     | PHA Plan Submission Type:  | Annual Su            | bmission Revised An                 | nual Submission        |                 |                |  |  |  |  |
|     | Availability of Information. PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. |                      |                                     |                        |                 |                |  |  |  |  |
|     | Participating PHAs   | PHA Code             | Program(s) in the Consortia         | Program(s) not in the  | No. of Units in | n Each Program |  |  |  |  |
|     | •  | THAT COUL            | 110gram(s) in the consortia         | Consortia              | PH              | HCV            |  |  |  |  |
|     | Lead PHA:  |                      |                                     |                        |                 |                |  |  |  |  |
|     |  |                      |                                     |                        |                 |                |  |  |  |  |

| В.  | Plan Elements   |
|-----|---|
| B.1 | Revision of Existing PHA Plan Elements.  (a) Have the following PHA Plan elements been revised by the PHA?  Y N   |
|     | Statement of Housing Needs and Strategy for Addressing Housing Needs         Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. (See Section c)         Financial Resources.         Rent Determination.         Operation and Management.         Grievance Procedures.         Homeownership Programs.         Safety and Crime Prevention.         Pet Policy.         Asset Management.         Substantial Deviation.         Significant Amendment/Modification |
|     | (b) If the PHA answered yes for any element, describe the revisions for each revised element(s):  |

#### **Housing Needs**

The CDA relies on a number of resources to identify the greatest needs for assisted housing. These resources 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.

The City of Madison 2020-2024 Consolidated Plan 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). The 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. The needs outlined in the Consolidated Plan are as follows:

- 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.
- 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.

The City of Madison's 2023 Housing Snapshot Report highlights the following local needs:

- Madison continues to grow rapidly with renter households and those earning very high incomes. New construction
  activity has increased significantly and homeownership growth has outpaced rental growth since 2019; however vacancy
  rates are still below "healthy" levels needed to alleviate rapid rental cost appreciation. New rental units are not affordable
  to median renter households due to supply not meeting demand and drastic increases in construction costs.
- Interest rates have stabilized (as elevated above pandemic lows), but lack of supply has further increased competition in the ownership market and increased barriers to access for median renter households. Availability and cost trends for both ownership and rental markets have created a supply-demand mismatch, which disproportionately impacts lower-income households.
- Housing cost-burden rates continue to increase for both owner and renter households.
- Additional homeless funding and programs have contributed to a reduction in persons experiencing homelessness.
- Historic racialization of poverty created economic segregation of geographic opportunity with income-restricted housing
  programs not equally distributed, and mostly located on Madison's North and South sides. For renters, the median Black
  household is the only demographic by race unable to afford the median rent.
- There has been a recent growth in homeownership rates for Black, Asian, and Hispanic/Latino households in the City of Madison.

The CDA maintains a wait list for its Public Housing, Multifamily Housing, and Section 8 Housing Choice Voucher Programs. Wait list demographics include income, family composition, race, and ethnicity and indicate 88% of applicants applying to CDA housing programs have incomes within the extremely low-income category, 48% are families with minor children and 40% are families with disabilities, 59% are African-American households, and 8% are Hispanic or Latino households:

| WAIT | LIST | <b>TOTAL</b> | - 7/06 | /2023 |
|------|------|--------------|--------|-------|
|------|------|--------------|--------|-------|

| <b>G</b>                         | 7367 |
|----------------------------------|------|
| Section 8 Housing Choice Voucher | 1685 |
| Multifamily Housing              | 1781 |
| Public Housing                   | 3901 |

|  | # of Families | % of families |  |
|--|---------------|---------------|--|
| INCOME QUALIFICATIONS                  |               |               |  |
| Extremely low income (<=30% AMI)       | 6489          | 88.08%        |  |
| Very low income (>30% but <=50% AMI)   | 649           | 8.81%         |  |
| Low income (>50% but <80% AMI)         | 229           | 3.11%         |  |
| FAMILY COMPOSITION                     |               |               |  |
| Families with children                 | 3522          | 47.81%        |  |
| Elderly Families                       | 434           | 5.89%         |  |
| Families with Disabilities             | 2952          | 40.07%        |  |
| Single                                 | 459           | 6.23%         |  |
| RACE                                   |               |               |  |
| African American                       | 4323          | 58.68%        |  |
| White                                  | 2491          | 33.81%        |  |
| Asian                                  | 143           | 1.94%         |  |
| American Indian/Alaska Native          | 69            | 0.94%         |  |
| Native Hawaiian/Other Pacific Islander | 36            | 0.49%         |  |
| Not Assigned                           | 305           | 4.14%         |  |
| ETHNICITY                              |               |               |  |
| Hispanic or Latino                     | 600           | 8.14%         |  |
| Not Hispanic or Latino                 | 6767          | 91.86%        |  |

#### **Financial Resources**

The CDA's estimated financial resources for the year 2024 are as follows:

| CDA Financial Resources  |              |   |  |  |  |  |  |  |  |
|--|--------------|---|--|--|--|--|--|--|--|
| Sources  | Planned \$   | Planned Uses                              |  |  |  |  |  |  |  |
| Federal Grants (2022)  |              |   |  |  |  |  |  |  |  |
| Public Housing Operating Fund  | \$ 1,903,422 |   |  |  |  |  |  |  |  |
| <ul> <li>Public Housing Capital Fund</li> </ul>  | \$ 2,341,461 |   |  |  |  |  |  |  |  |
| > Section 8 Housing Assistance Payments  | \$19,800,000 |   |  |  |  |  |  |  |  |
| > Section 8 Administrative Fund  | \$ 1,635,463 |   |  |  |  |  |  |  |  |
| Multifamily Housing Assistance Payments  | \$ 646,011   |   |  |  |  |  |  |  |  |
| > Section 8 Family Self-Sufficiency Grant  | \$ -0-       | Section 8 FSS Program Services            |  |  |  |  |  |  |  |
| > Multifamily Housing Service Coordinator Grant  | \$ 176,661   | Multifamily Resident Services             |  |  |  |  |  |  |  |
| <ul> <li>Public Housing Resident Opportunities and Self-<br/>Sufficiency Grant (3 Year Grant)</li> </ul> | \$ 81,951    | Public Housing Resident Services          |  |  |  |  |  |  |  |
| Prior Year Federal Grants (Unobligated Funds Only)   | \$ -0-       |   |  |  |  |  |  |  |  |
| Public and Multifamily Housing Dwelling Rental Income  | \$ 3,977,151 | Public and Multifamily Housing Operations |  |  |  |  |  |  |  |
| Other Non-Dwelling Income  | \$ 325,304   | Public and Multifamily Housing Operations |  |  |  |  |  |  |  |
| Non-Federal Sources  | \$ -0-       |   |  |  |  |  |  |  |  |

#### **Public Housing Rent Determination**

Chapter 6 of the Public Housing Admissions and Continued Occupancy Policies (ACOP) provides CDA rent determination policies. The following changes have been implemented per HUD rules and guidance:

- Income-based rent is determine by the family's total tenant payment (TTP) minus any applicable tenant-paid utilities. Alternative non-public housing rent will be a factor in the TTP formula for those tenants whose income exceeds the over-income limit for 24 consecutive months.
- The CDA's ceiling rents will be set to the level required for flat rents.
- In cases of temporary hardship determined by the CDA, minimum rent will be suspended for a 90-day period. At the end of the 90-day suspension period, the family must resume payment of the minimum rent and must repay the CDA the amounts suspended.
- The CDA will consider a family's request for a higher utility allowance and grant individual relief on reasonable grounds (e.g. defects in the meter, specialized equipment needed for a person with disabilities).
- The earned income disallowance (EID) encourages people to enter the work force by not including the full value of increases in earned income for a period of time. Under HUD's revised EID calculation method, families paying flat rent cannot qualify for the EID, even if a family member experiences an event that would qualify for the EID. If the family later chooses to pay income-based rent, they would only qualify for the EID if a new qualifying event occurred.

#### **Operation and Management**

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

A Public Housing Authority's ACOP describes the policies the Housing Authority has adopted. Public Housing program regulations specify the policy areas that must be covered in the ACOP. Periodically, The U.S. Department of Housing and Urban Development (HUD) amends these regulations and requires new ACOP requirements. The CDA's ACOP cites and describes HUD regulations and other requirements in detail, as well as CDA policies in those areas where the CDA has discretion to establish local policy. Proposed revisions made to the CDA's ACOP bring the ACOP in compliance with all recent HUD requirements and guidance. Revisions have also been made to ensure the content of the ACOP is user-friendly. CDA Pubic Housing program policy changes are detailed in Attachment A, and summarized as follows:

- Changes to policies regarding reasonable accommodations as related to utility allowances per the *Utility Allowance Guidebook* and other HUD regulations and requirements
- Clarifications regarding family debts to the CDA as outlined in Notice PIH 2018-18
- Minor clarifications on applying the Social Security Administration Cost of Living Adjustment (COLA) at annual and interim reexaminations per Notice PIH 2018-24
- Additions and clarifications to account for the new version of the *Public Housing Occupancy Guidebook*, which is currently in development and being released chapter-by-chapter
- Per Notice PIH 2021-29, changes to the timeframes under which a Notice to Vacate would be provided for nonpayment of rent under nationwide emergency orders
- Revisions for the new Carbon Monoxide (CO) detector requirements as specified in Notice PIH 2022-01
- Updates to definitions concerning the Family Self-Sufficiency (FSS) program as set forth in the final rule published in the *Federal Register* on May 17, 2022
- Changes throughout to account for the over-income provisions of the final rule implementing parts 102, 103, and 104 of
  the Housing Opportunity Through Modernization Act (HOTMA), published in the Federal Register February 14, 2023
- Updates to bring the policy in line with Violence Against Women Act of (VAWA) 2022 implementation guidance, set forth in the *Federal Register* January 4, 2023
- Revisions to flat rent requirements as specified in Notice PIH 2022-33
- Clarifications on the discrimination complaint process as it relates both in general and to complaints under the Equal Access Rule

#### Section 8 Housing Choice Voucher Program Administrative Plan (Admin Plan)

The U.S. Department of Housing and Urban Development (HUD) requires all Public Housing Authorities to adopt and maintain a written administrative plan that establishes local policies for Section 8 program administration. The administrative plan must state the PHA's policies in those areas where the PHA has discretion to establish local policy. Periodically, HUD amends regulations applicable to the Section 8 program. The CDA's Section 8 Admin Plan cites and describes HUD regulations and other requirements in detail, as well as CDA policies in those areas where the CDA has discretion to establish local policy. Proposed revisions will bring the CDA's Section 8 Admin Plan current with all recent HUD requirements and guidance. Revisions have also been made to ensure the content of the Admin Plan is user-friendly. CDA Section 8 program policy changes are detailed in Attachment B, and summarized as follows:

- Changes to incorporate guidance from HUD's new HCV Guidebook chapters
- Revisions regarding Notice PIH 2022-18 on the use of administrative fee funding for "other expenses"
- Updates to account for the final rule, "Streamlining and Implementation of Economic Growth, Regulatory Relief, and Consumer Protection Act Changes to Family Self-Sufficiency (FSS) Program," published May 17, 2022
- Extensive revisions for the *Federal Register* notice implementing the Fostering Stable Housing Opportunities (FSHO) amendments, published January 24, 2022
- Additions regarding Veterans Affairs Supportive Housing (HUD-VASH) as specified in the revised VASH implementation notice, published in the *Federal Register* September 27, 2021
- Changes to Chapter 15 on Special Housing Types for Form HUD-52641, Notice PIH 2021-05 on Shared Housing, and the new *HCV Guidebook*, and to improve the chapter's utility
- Updates to account for the June 2020 version of the RAD PBV Quick Reference Guide
- Clarifications regarding Social Security and SSI benefits, repayment policies, and record retention per HUD Notice PIH 2018-18

#### **Homeownership Programs**

The CDA continues to manage a Section 8 Housing Choice Voucher (HCV) Homeownership program, which allows families who are assisted under the HCV program to use their voucher to buy a home and receive monthly assistance in meeting homeownership expenses. The CDA's HCV Homeownership program is available only to families who have been admitted to the CDA's HCV program. To participate in the HCV Homeownership program, the HCV family must meet specific income and employment requirements, be a first-time homeowner, and attend and satisfactorily complete a CDA approved pre-assistance homeownership and housing counseling program.

The CDA also intends to submit its draft Section 32 Homeownership Plan to HUD as approved by the CDA Board. The plan includes 12 scattered-site, single-family housing units, which would be available for purchase by low-income families. The CDA would use the proceeds of any sale for the provision of low-income housing or to benefit residents of the CDA through modernization or operation of existing public housing; development of public housing; funding of homeownership units; construction, rehabilitation and/or acquisition of dwelling units assisted by funds under Section 8; benefits to the residents of the CDA (e.g. job training, child care programs, service coordination); leveraging other funds to secure commercial enterprises on-site to serve public housing residents; funding shortfalls or other new allocations of vouchers under Section 8; and other housing assisted under the 1937 Act or benefits to the residents of the CDA, as approved by HUD. Proceeds may be leveraged with other funds so long as net proceeds are used on a pro-rata basis to fund only HUD-approved uses (e.g. low-income housing units). The CDA may also form partnerships with non-profit and private developers to increase the opportunities for affordable homeownership through community efforts that include for-sale affordable and mixed-income housing production.

#### **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
- Dispose of non-dwelling facilities and vacant incidental land where disposition does not interfere with continued operation of the remaining portion of the development

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

The CDA's Annual Plan, along with other documents required by HUD (e.g. Section 8 Administrative Plan, Public Housing Admissions and Continued Occupancy Policies), are valuable tools in explaining to the public and to CDA Staff, the CDA's policies and procedures. These documents are organized, readily accessible, and easy to understand. Revisions are made periodically 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.

(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

# B.2 New Activities. (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N ☐ Hope VI or Choice Neighborhoods. ☐ Mixed Finance Modernization or Development. ☐ Demolition and/or Disposition. ☐ Designated Housing for Elderly and/or Disabled Families. ☐ Conversion of Public Housing to Tenant-Based Assistance. ☐ Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. ☐ Occupancy by Over-Income Families. ☐ Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. ☐ Designated Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. ☐ Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. ☐ Non-Smoking Policies. ☐ Project-Based Vouchers. ☐ Units with Approved Vacancies for Modernization.

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

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

The CDA continues to assess its current inventory of housing to identify potential redevelopment, including mixed-finance development or through a Choice Neighborhood Initiative funding option. The CDA will continue to 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 some or 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 a 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 may disposition any non-dwelling facilities or land, when the CDA determines that the non-dwelling facilities or land exceeds the needs of the development; or the disposition of the property is incidental to, or does not interfere with, continued operation of the remaining portion of the development. Such disposition includes, but is not limited to administrative buildings, community buildings, excess non-dwelling property remaining from a RAD conversion, or excess non-dwelling property at a current development.

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, and Scattered Site East and West Housing. Developments specifically targeted for new activities in 2023 and 2024 include:

• The CDA intends to undertake repositioning and redevelopment of its Triangle Site housing portfolio (AMP 400). While well maintained over the decades, all of the Triangle buildings have begun to deteriorate and face significant costs to renovate to modern standards. As the buildings within the Triangle portfolio approach the end of their useful lives, the CDA expects that it will be most cost-effective to replace most or all buildings with new construction, while ensuring that each structure fits within a larger master plan and vision that meets the needs of current and future Triangle residents. The CDA conducted robust tenant and community engagement in 2022 and in 2023. Through Triangle tenant and staff input, a draft master plan was created by New Year Investments, a developer partner and consultant. *Our Triangle Taking Shape Master Plan* provides site planning, project schedule, sustainability plans and financial strategy. The CDA Board is expected to approve Our Triangle Taking Shape Master Plan on August 10, 2023.

• The portfolio consists of the following HUD subsidized housing:

| Subsidized Housing        | Address                        | <b>Total Dwelling Units</b> |
|---------------------------|--------------------------------|-----------------------------|
| Public Housing (PH)       |                                |                             |
| Gay Braxton Apartments    | 604 – 762 Braxton Place        | 60                          |
| Brittingham Apartments    | 755 Braxton Place              | 164                         |
|                           | Total PH                       | 224                         |
| Multifamily Housing (MFH) |                                |                             |
| Karabis Apartments        | 201 S. Park Street             | 20                          |
| Parkside Highrise         | 245 S. Park Street             | 83                          |
| Parkside Townhomes        | 802 – 824 W. Washington Avenue | 12                          |
|                           | Total MFH                      | 115                         |
|                           |                                |                             |
|                           | Total Triangle Units           | 339                         |

Our Triangle Taking Shape includes a phased, long-term approach that will replace or substantially upgrade every unit at the Triangle within the next 10 years, increasing the number of units from 339 to 1,200 units:

Site Plan – Addresses housing needs by increasing housing opportunities; provides connectivity for less tenant isolation through a courtyard building focus with tenant access to open space; minimizes public streets and surface parking; focuses on safety, common areas, and amenities; maintains an enhanced grocery on-site; and creates a shared-use path connecting Madison's East Campus Mall patch through Brittingham Park.

Project Schedule – Provides five (5) phases with estimated completion of each phase in 2026 (Phase 1), 2028 (Phase 2), 2032 (Phase 3 and Phase 4), and 2034 (Phase 5).

Sustainability – Provides sustainable development and reduced operating costs which supports residents in safe, affordable, and healthy homes through electric building operation, a solar infrastructure, and no use of fossil fuels for combustion or on-site energy, except for emergency power generation.

Financial Strategy – Phase 1 converts the existing Public Housing subsidy through a combination of Section 18 Disposition/Demolition and Rental Assistance Demonstration (RAD) and also includes Low-Income Housing Tax Credits, City of Madison Affordable Housing Funds, HOME funding, City of Madison Tax Incremental Financing (TIF), and Federal Home Loan Bank Affordable Housing Program loans.

The CDA Board is expected to adopt *Our Triangle Taking Shape* on August 10, 2023 and authorize staff to enter into a development agreement for Phase 1 design, approvals, tenant engagement, and pre-development work. A CDA development team will prepare and submit Phase 1 Low-Income Housing Tax Credit application in January, 2024.

• The Triangle – Brittingham Apartments: The CDA was a successful applicant in HUD's Rental Assistance Demonstration (RAD) program. The CDA is considering the repositioning path of a RAD/Section 18 Blend.

The new Brittingham Apartments are expected to be the first phase of the larger "Taking Shape" project at the Triangle development site in downtown Madison. The project plan is to build first and then move residents from the existing Brittingham property. A newly constructed, 163-unit building will be delivered where there is currently open space and a parking lot within the Triangle site.

Under a RAD/Section 18 Blend transaction, in conjunction and simultaneously with RAD, the CDA may also utilize Section 18 under the guidelines set forth in PIH Notice 2021-07 which allows the Authority to dispose of up to 60% of its units through Section 18. This is a blend of RAD Project Based Vouchers (PBV) and Tenant Protection Vouchers (TPV) under the guidelines of Notice PIH 2021-07 (HA) and H 2019-09/PIH 2019-23 (HA), REV-4, and any successor Notices. The RAD units will be governed under a RAD PBV HAP Contract, and the Section 18 units will be governed under a PBV HAP Contract because the TPVs will be project-based at the site. If the CDA chooses this repositioning path, the CDA will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6 of H 2019-09/PIH 2019-23 (HA), REV-4; and H-2016-17/PIH-2016-17. These resident rights, participation, waiting list and grievance procedures may be found in Attachment C and D.

The CDA is also considering the repositioning path of Section 18 Demolition and Disposition Applications for Brittingham Apartments. If this repositioning path is taken, the CDA may demolish or disposition of Brittingham Apartments if the CDA finds the units to be 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 Public Housing units to a 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 may also disposition any non-dwelling facilities or land, when the CDA determines that the non-dwelling facilities or land exceeds the needs of the development; or the disposition of the property is incidental to, or does not interfere with, continued operation of the remaining portion of the development. Such disposition includes, but is not limited to administrative buildings, community buildings, or excess non-dwelling property at Brittingham Apartments. Section 18 activities may utilize TPVs and may utilize PBVs. Any relocation necessitated by any Section 18 activities will be undertaken in accordance with 24 CFR § 970.21 (Attachment E).

For the purposes of HUD's consideration of New Construction Site Selection and Neighborhood Standards, the Madison CDA has determined that the site is not located in a HUD minority concentration area, based on a review of racial/ethnic data for census tract 12 and the applicable Metropolitan Statistical Area (MSA). The Madison CDA has also determined that the site is not located in a racially mixed area.

The Madison CDA certifies that the site meets all applicable site selection requirements as outlined in Section 5.2 of Notice H-2016-17; PIH-2016-17. The site complies with the site selection requirements set forth at Title 24 CFR § 983.57 | Appendix III of PIH-Notice H2019-09/PIH 2019-23 (HA). The site is suitable from the standpoint of facilitating and furthering full compliance with the applicable provisions of Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Executive Order 11063, and HUD regulations issued pursuant thereto. In conducting its review of site selection for the proposed project, the PHA completed a review with respect to accessibility for persons with disabilities and the proposed site is consistent with disabilities and the proposed site is consistent with applicable accessibility standards under the Fair Housing Act, Section 504, and the ADA.

- 12 single-family homes within the CDA's West Site (AMP 300) inventory have been identified for disposition. The CDA reviewed several strategies for low-income homeownership, including the Section 32 homeownership program and Section 18 disposition to a non-profit provider of low-income homeownership. On October 11, 2018, the CDA Board adopted Resolution No. 4298, which approves submission of a Public Housing Homeownership Plan to HUD. Under the plan, current low-income residents or other eligible buyers would have an opportunity to purchase these homes and realize the benefits of owning their own home. The CDA intends to update the homeownership plan and submit to HUD for approval along with other required documents (e.g. environmental review, appraisals, physical condition report, legal opinion, budget, and timetable).
- 48 units remain at Truax Park Apartments for development under AMP 200. These units were originally former Air Force family housing and are located in multi-story brick/concrete buildings located at 1, 3, 5, 7, 9, 11, 13 and 15 Straubel Court. 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) of these units meets HUD's TDC limit. Pursuant to the CDA's Truax Master Plan and Site Development Study, these 48 units, along with 28 units at 1605 1671 Wright Street (known as "A" Site) may be repositioned through a Rental Assistance Demonstration (RAD) conversion.
- The CDA's Baird Fisher Public Housing development (AMP 300, WI 3-1 D Site) has been identified for possible redevelopment and repositioning. Baird Fisher was constructed in 1965 and faces challenges as it is scattered site housing with antiquated systems and few amenities. Baird Fisher consists of 10 buildings and 26 units situated on three contiguous parcels on the City's South side. Through extensive public input, the City of Madison adopted the South Madison Plan as a supplement to the City's Comprehensive Plan in 2022. The plan contains focus areas which create development opportunities at West Badger Road and South Park Street, including opportunity to create new replacement housing for Baird Fisher. The City of Madison intends to finalize a Master Plan and begin design of new buildings in 2024 and the CDA intends to leverage redevelopment opportunities for Baird Fisher through the City of Madison's development plan.

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 will be re-occupied by an eligible family.

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

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.

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.

#### **B.3** Progress Report.

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

The CDA's 5-Year Plan for 2020 – 2024 provides the following strategic goals:

- Goal 1. Expand the supply of assisted housing
- Goal 2. Improve the quality of assisted housing
- Goal 3. Improve the quality of life for program participants
- Goal 4. Promote self-sufficiency and economic opportunity
- Goal 5. Maintain fiscally responsible operations and financial sustainability
- Goal 6. Provide highest quality of governance and services
- Goal 7. Ensure equal opportunity and further non-discrimination in CDA housing
- Goal 8. Violence Against Women Act (VAWA) compliance.

The CDA's goals align with HUD and City of Madison goals and provide specific objectives and opportunities, which will enable the CDA to serve the needs of low-income families for the next five years. In 2022 and 2023, the CDA engaged in or completed the following initiatives:

#### Goal 1: Expand the supply of assisted housing

#### **Objectives:**

- Reduce vacancies in Public and Multifamily Housing
- Increase or maintain funding
- Pursue partnerships with other agencies to provide additional assisted housing for qualifying families
- Improve Section 8 voucher lease up success rate and timing
- Provide homeownership programs for low-income families
- Effectively position existing CDA Public Housing portfolio for preservation
- Develop new dwelling units when feasible

#### **Initiatives:**

The CDA maintains an Annual Contributions Contract (ACC) with the Department of Housing and Urban Development (HUD) to lease and manage 766 units of Public Housing. Section 9(g)(3) of the United States Housing Act of 1937 (Faircloth Amendment) sets the limit on the number of Public Housing units for which a public housing authority may receive Capital Funds and Operating Funds. The CDA's current inventory of Public Housing is as follows:

| CDA Public Housing Unit Inventory |               |                            |                    |                    |  |  |  |  |  |
|-----------------------------------|---------------|----------------------------|--------------------|--------------------|--|--|--|--|--|
| Asset Management Project #        | Project Name  | General<br>Occupancy Units | Non-Dwelling Units | Total ACC<br>Units |  |  |  |  |  |
| AMP 200                           | East Site     | 159                        | 3                  | 162                |  |  |  |  |  |
| AMP 300                           | West Site     | 262                        | 3                  | 265                |  |  |  |  |  |
| AMP 400                           | Triangle Site | 220                        | 4                  | 224                |  |  |  |  |  |
| AMP 500                           | Truax Phase 1 | 47                         | 0                  | 47                 |  |  |  |  |  |
| AMP 600                           | Truax Phase 2 | 40                         | 0                  | 40                 |  |  |  |  |  |
|                                   |               | 734                        | 8                  | 738                |  |  |  |  |  |
| Removed From Inventory            |               |                            |                    | 28                 |  |  |  |  |  |
| Faircloth Limit                   |               |                            |                    | 766                |  |  |  |  |  |

On November 4, 2022, HUD approved the CDA's Section 18 disposition application for two (2) buildings located on Theresa Terrace. The disposition removes four (4) scattered site units from the Public Housing inventory. The buildings were vacant and not eligible for Section 8 assistance. The CDA sold the units to the Madison Revitalization and Community Development Authority (MRCDC) on June 30, 2023. The MRCDC will begin demolition and build two (2) new buildings on the existing sites, adding additional units as affordable housing per HUD affordability requirements.

Designated non-dwelling units provide space as approved by HUD for resident self-sufficiency activities and other activities, as well as for CDA property management office space. CDA non-dwelling unit space is currently occupied by Dane County Human Services Joining Forces for Families, Truax Neighborhood Association, ROSS Grant Coordinators, Mentoring Positives, Triangle Health & Resource Center, and Triangle Ministry. On May 1, 2023, two (2) efficiency units located at Gay Braxton Apartments (Triangle Site – AMP 400) were approved by HUD for special use and the CDA intends to enter into a lease agreement with the Triangle Ministry and Edgewood College Nursing Students so that the units may be used for Triangle resident services.

The CDA also maintains two Housing Assistance Payment (HAP) Contracts with the Wisconsin Housing and Economic Development Authority (WHEDA) to lease and manage 115 units of Multifamily Housing (Section 8 New Construction):

| CDA Multifamily Housing Inventory                          |     |   |     |  |  |  |  |  |
|--|-----|---|-----|--|--|--|--|--|
| Project Name Assisted Units Non-Dwelling Units Total Units |     |   |     |  |  |  |  |  |
| Karabis Apartments   | 20  | 0 | 20  |  |  |  |  |  |
| Parkside Apartments  | 94  | 1 | 95  |  |  |  |  |  |
|  | 114 | 1 | 115 |  |  |  |  |  |

The Faircloth Amendment stipulates that HUD cannot fund the construction or operation of new public housing units if the construction of those units would result in a net increase in the number of units the Public Housing Agency (PHA) owned, assisted or operated as of October 1, 1999. Although the CDA is unable to increase the number of Public Housing units in its portfolio per HUD's Faircloth limit, the CDA can contribute to the supply of assisted housing by ensuring a high occupancy rate within its existing portfolio of assisted units. HUD's goal for occupancy is 98%. CDA Site developments that implemented initiatives to reduce vacancies and maintain high occupancy rates are highlighted below:

| Average Occupancy Rate |        |           |         |        |                               |  |  |  |  |
|------------------------|--------|-----------|---------|--------|-------------------------------|--|--|--|--|
| Development            | 2019   | 2019 2020 |         | 2022   | 2023<br>(as of June 30, 2022) |  |  |  |  |
| East Amp 200           | 94.68% | 98.29%    | 98.64%  | 97.89% | 97.43%                        |  |  |  |  |
| West Amp 300           | 95.68% | 95.79%    | 94.25%  | 95.82% | 95.97%                        |  |  |  |  |
| Triangle Amp 400       | 97.95% | 95.68%    | 93.64%  | 95.46% | 95.61%                        |  |  |  |  |
| Truax Phase 1 Amp 500  | 99.29% | 99.82%    | 99.82%  | 98.58% | 99.29%                        |  |  |  |  |
| Truax Phase 2 Amp 600  | 99.38% | 100.00%   | 100.00% | 99.79% | 100.00%                       |  |  |  |  |
| Truax PBV Units        | 96.18% | 94.10%    | 99.65%  | 97.57% | 100.00%                       |  |  |  |  |
| Parkside               | 98.35% | 97.48%    | 92.19%  | 93.40% | 91.67%                        |  |  |  |  |
| Karabis                | 99.17% | 93.33%    | 98.75%  | 94.58% | 99.17%                        |  |  |  |  |

The CDA continues to administer housing assistance on behalf of low-income individuals and families through the Housing Choice Voucher (HCV) program. Under the program, the CDA pays a housing subsidy directly to the private landlord and the program participant pays the difference between actual rent charged and the amount subsidized by the program. An Annual Contributions Contract (ACC) between HUD and the CDA provides the CDA with funding for housing assistance. The following chart represents the CDA's ACC voucher baseline:

| ACC Voucher Baseline |   |             |                              |  |  |  |  |  |  |
|----------------------|---|-------------|------------------------------|--|--|--|--|--|--|
| # of Vouchers        | Housing Choice Voucher<br>Section 8 Program                     | Award Date  | Total Vouchers<br>(Baseline) |  |  |  |  |  |  |
|                      | Tenant Based Voucher - Starting Baseline                        |             | 1,606                        |  |  |  |  |  |  |
| 50                   | Family Unification Program                                      | 7/08/2009   | 1,656                        |  |  |  |  |  |  |
| 35                   | Veterans Affairs Supportive Housing                             | 8/06/2009   | 1,691                        |  |  |  |  |  |  |
| 50                   | Family Unification Program                                      | 8/06/2010   | 1,741                        |  |  |  |  |  |  |
| 25                   | Veterans Affairs Supportive Housing                             | 7/14/2011   | 1,766                        |  |  |  |  |  |  |
| 25                   | Veterans Affairs Supportive Housing                             | 4/4/2012    | 1,791                        |  |  |  |  |  |  |
| 25                   | Veterans Affairs Supportive Housing                             | 8/01/2013   | 1,816                        |  |  |  |  |  |  |
| 23                   | Veterans Affairs Supportive Housing                             | 8/14/2014   | 1,839                        |  |  |  |  |  |  |
| 21                   | Veterans Affairs Supportive Housing                             | 4/01/2015   | 1,860                        |  |  |  |  |  |  |
| 25                   | Veterans Affairs Supportive Housing<br>(Project-Based Vouchers) | 5/01/2016   | 1,885                        |  |  |  |  |  |  |
| 6                    | Veterans Affairs Supportive Housing                             | 9/01/2016   | 1,891                        |  |  |  |  |  |  |
| 7                    | Veterans Affairs Supportive Housing                             | 4/01/2018   | 1,898                        |  |  |  |  |  |  |
| 12                   | Veterans Affairs Supportive Housing                             | 3/01/2019   | 1,910                        |  |  |  |  |  |  |
| 10                   | Moving Up Voucher   | 2019        | 1,920                        |  |  |  |  |  |  |
| 30                   | Oakwood Tenant Protection Voucher                               | 3/01/2020   | 1,950                        |  |  |  |  |  |  |
| 5                    | Veterans Affairs Supportive Housing                             | 5/01/2020   | 1,955                        |  |  |  |  |  |  |
| 45                   | Mainstream Voucher  | 7/01/2020   | 2,000                        |  |  |  |  |  |  |
| 14                   | Mainstream Voucher  | 7/01/2020   | 2,014                        |  |  |  |  |  |  |
| 69                   | Emergency Housing Voucher                                       | 7/01/2021   | 2,083                        |  |  |  |  |  |  |
| 32                   | CDA Scattered Site Tenant Protection Voucher                    | 12/20/2021  | 2,115                        |  |  |  |  |  |  |
| 5                    | Veterans Affairs Supportive Housing                             | 12/20/2021  | 2,120                        |  |  |  |  |  |  |
| 5                    | Veterans Affairs Supportive Housing                             | 1/13/2022   | 2,125                        |  |  |  |  |  |  |
| 23                   | Fair Share HCV  | 9/28/2022   | 2,148                        |  |  |  |  |  |  |
| -18                  | Oakwood Retired Vouchers  | 2020 - 2022 | 2,130                        |  |  |  |  |  |  |
| 10                   | Stability Voucher   | 4/17/2023   | 2,140                        |  |  |  |  |  |  |

The CDA's Section 8 voucher authority increased in 2022 and 2023 with additional funding for the Veterans Affairs Supportive Housing program, as well as 23 Fair Share and 10 Stability vouchers

Voucher utilization is the degree to which the CDA uses available annual budget authority through leasing of Section 8 units. The more units that are leased, the greater amount of annual budget authority used. Managing utilization is a critical component of voucher program management. Significant under-leasing prevents families in need from participating in the Section 8 program and also causes the CDA to lose ongoing administrative fee income that is earned directly in proportion to the number of units under lease. The charts below represent the CDA's voucher utilization for 2022 and thru May 2023:

#### 2022 Housing Choice Voucher Utilization Report

|  | January    | February  | March     | April     | May       | June      | July      | August    | September | October   | November  | December  |
|--|------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| -  |            |           |           |           |           |           |           |           |           |           |           |           |
| ACC Vouchers                               | 1977       | 1977      | 1977      | 1977      | 1977      | 1977      | 1977      | 1977      | 1977      | 1977      | 1977      | 1977      |
| Total Funding Available                    | 1,321,067  | 1,321,067 | 1,321,067 | 1,321,067 | 1,321,067 | 1,321,067 | 1,321,067 | 1,321,067 | 1,321,067 | 1,321,067 | 1,321,067 | 1,321,067 |
| (Monthly)                                  |            |           |           |           |           |           |           |           |           |           |           |           |
| Homeownership                              | 39         | 40        | 40        | 40        | 41        | 41        | 41        | 41        | 41        | 40        | 40        | 39        |
| Family Unification (FUP)                   | 87         | 87        | 87        | 87        | 87        | 90        | 85        | 79        | 81        | 79        | 76        | 79        |
| Portable Vouchers                          | 27         | 29        | 12        | 34        | 12        | 12        | 13        | 62        | 34        | 77        | 45        | 23        |
| Tenant Protection Vouchers                 | 28         | 61        | 43        | 45        | 44        | 41        | 41        | 41        | 41        | 41        | 40        | 42        |
| Veterans Affairs Supported Housing (VASI   | H) AII 176 | 195       | 173       | 177       | 169       | 199       | 166       | 180       | 177       | 190       | 178       | 181       |
| Other Vouchers                             | 1408       | 1367      | 1356      | 1381      | 1338      | 1330      | 1313      | 1341      | 1367      | 1369      | 1299      | 1359      |
| Total Vouchers                             | 1765       | 1779      | 1711      | 1774      | 1691      | 1713      | 1659      | 1744      | 1741      | 1753      | 1678      | 1723      |
| Voucher Utilization Rate                   | 89%        | 90%       | 87%       | 90%       | 86%       | 87%       | 84%       | 88%       | 88%       | 89%       | 85%       | 87%       |
|  |            |           |           |           |           |           |           |           |           |           |           |           |
| Total Housing Assistance Payments (HAP)    | 1,368,644  | 1,374,957 | 1,350,472 | 1,369,314 | 1,320,016 | 1,324,254 | 1,268,253 | 1,334,068 | 1,331,563 | 1,382,816 | 1,322,488 | 1,366,933 |
| HAP Utilization Rate                       | 104%       | 104%      | 102%      | 104%      | 100%      | 100%      | 96%       | 101%      | 101%      | 105%      | 100%      | 103%      |
| Per Unit Cost (PUC)                        | 775        | 773       | 789       | 772       | 781       | 773       | 764       | 765       | 765       | 789       | 788       | 793       |
|  |            |           |           |           |           |           |           |           |           |           |           |           |
| Project Based Vouchers Leased              | 207        | 231       | 205       | 227       | 201       | 191       | 194       | 197       | 225       | 212       | 185       | 211       |
| Total Project Based Vouchers Available PBV | 234        | 234       | 234       | 234       | 234       | 234       | 234       | 234       | 234       | 234       | 234       | 234       |
| Utilization Rate                           | 88%        | 99%       | 88%       | 97%       | 86%       | 82%       | 83%       | 84%       | 96%       | 91%       | 79%       | 90%       |

#### 2023 Housing Choice Voucher Utilization Report

|   | January   | February  | March     | April     | May       |
|---|-----------|-----------|-----------|-----------|-----------|
|   |           |           |           |           |           |
| ACC Vouchers                              | 2005      | 2005      | 2005      | 2005      | 2005      |
| Total Funding Available (Monthly)         | 1,403,602 | 1,403,602 | 1,403,602 | 1,403,602 | 1,403,602 |
| Homeownership                             | 38        | 37        | 40        | 39        | 39        |
| Family Unification (FUP)                  | 78        | 74        | 78        | 76        | 78        |
| Portable Vouchers                         | 32        | 28        | 26        | 18        | 28        |
| Tenant Protection Vouchers                | 37        | 41        | 42        | 40        | 40        |
| Veterans Affairs Supported Housing (VASH) | 194       | 186       | 190       | 193       | 185       |
| All Other Vouchers                        | 1313      | 1352      | 1318      | 1344      | 1328      |
| Total Vouchers                            | 1705      | 1718      | 1694      | 1710      | 1698      |
| Voucher Utilization Rate                  | 85%       | 86%       | 84%       | 85%       | 85%       |
| Total Housing Assistance Payments (HAP)   | 1,311,547 | 1,341,832 | 1,334,579 | 1,350,313 | 1,387,724 |
| HAP Utilization Rate                      | 93%       | 96%       | 95%       | 96%       | 99%       |
| Per Unit Cost (PUC)                       | 769       | 781       | 788       | 790       | 817       |
| Project Based Vouchers Leased             | 191       | 217       | 213       | 219       | 197       |
| Total Project Based Vouchers Available    | 234       | 234       | 234       | 234       | 234       |
| PBV Utilization Rate                      | 82%       | 93%       | 91%       | 94%       | 84%       |
| Mainstream Vouchers (59)                  | 39        | 40        | 41        | 43        | 43        |
|   | 66%       | 68%       | 69%       | 73%       | 73%       |
| Emergency Housing Vouchers (69)           | 26        | 25        | 24        | 37        | 34        |
|   | 38%       | 36%       | 35%       | 54%       | 49%       |

The CDA continues to issue Section 8 vouchers to approved applicants who are referred to the CDA under the Family Unification Program (FUP), the Veterans Affairs Supportive Housing (VASH) Program, the Mainstream program and the Emergency Housing Voucher Program (EHV):

• The Family Unification Program (FUP) is focused at preventing family separation due to homelessness or lack of adequate housing, as well as to ease the transition out of foster care for aging-out youth who lack adequate housing. FUP referrals are provided to the CDA through an agreement with the Dane County Department of Human Services. The CDA currently has 100 FUP vouchers for utilization and maintains the following average FUP voucher utilization rates:

| \$        | Section 8 Family Unification Program (FUP) Utilization |           |                    |  |  |
|-----------|--|-----------|--------------------|--|--|
| Year 2020 | Year 2021  | Year 2022 | As of May 31, 2023 |  |  |
| 74%       | 85%  | 84%       | 77%                |  |  |

The Veterans Affairs Supportive Housing (VASH) program provides rental assistance for homeless veterans with case
management and clinical services provided by the Department of Veterans Affairs (VA). The CDA currently has 214
VASH vouchers for utilization and maintains the following average VASH voucher utilization rates:

| Section 8 V | Section 8 Veterans Affairs Supportive Housing (VASH) Program Utilization |           |                    |  |  |
|-------------|--|-----------|--------------------|--|--|
| Year 2020   | Year 2021  | Year 2022 | As of May 31, 2023 |  |  |
| 79%         | 83%  | 84%       | 89%                |  |  |

- The Mainstream program provides assistance to non-elderly persons with disabilities who are in permanent supportive
  housing or rapid rehousing. The CDA has partnered with the Road Home of Dane County and the Madison Tenant
  Resource Center for referrals to issue 59 Mainstream vouchers. The CDA currently has 43 Mainstream vouchers under
  a HAP contract.
- The CDA received 69 Emergency Housing Vouchers (EHVs) in July of 2021. EHVs are tenant-based vouchers targeted to assist individuals and families who are experiencing homelessness or are at risk of homelessness, or who are a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking. The CDA has partnered with the Dane County Housing Authority and the Dane County Homeless Consortium to assist in qualifying families for EHV housing assistance through a direct referral process. The CDA currently has 42 EHV vouchers under a HAP contract.

The CDA also continued to administer Section 8 project-based voucher assistance to 234 units under the following PBV contracts:

| Award 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           |
| 2022       | MRCDC               | Formerly Public Housing Units                          | 32           |
|            |                     | TOTAL  | 234          |

Section 8 payment standards also have an impact on Section 8 program utilization and must be monitored on a regular basis. Each year the CDA reviews 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) for Madison, WI. The CDA completed a review of its payment standards in November of 2022 and determined that although the payment standards were increased to 105% of FMR as of July 1, 2022, given the large increase in HUD's 2023 FMR's, the payment standards must be increased again to ensure that participating families are able to find suitable housing. The CDA raised the payment standards effective January 1, 2023 to 100% of HUD FMR. After another review of the payment standards in February of 2023, the CDA adjusted the payment standards to 110% of HUD FMR. The CDA obtained a waiver from HUD to allow the new payment standards to be applied to all current Section 8 Housing Choice Voucher families effective April 1, 2023 rather than at the time of the family's next regular re-examination.

|   | CDA Housing Choice Voucher Program Payment Standards |             |             |               |              |  |
|---|--|-------------|-------------|---------------|--------------|--|
| CDA Payment Standard                        | Efficiency   | One-Bedroom | Two-Bedroom | Three-Bedroom | Four-Bedroom |  |
| Effective July 1, 2022 (105% of HUD FMR)    | \$975  | \$1,130     | \$1,317     | \$1,760       | \$1,965      |  |
| Effective January 1, 2023 (100% of HUD FMR) | \$1,007  | \$1,183     | \$1,378     | \$1,810       | \$2,041      |  |
| Effective April 1, 2023 (110% of HUD FMR)   | \$1,107  | \$1,301     | \$1,515     | \$1,991       | \$2,245      |  |

The CDA continues to support voucher mobility. For families who bring their vouchers from another jurisdiction, the CDA bills initial housing authorities for the assistance paid for incoming portable households. The CDA does this to preserve local voucher budget authority to serve families from the CDA waiting list. The CDA currently has no billings to initial housing authorities. Conversely, the CDA currently pays receiving housing authorities for 18 households who have ported out of the CDA's jurisdiction.

For homeownership efforts, the CDA continued to administer its Section 8 homeownership program, with a total of 60 families participating in the program since 2004, and 39 families currently utilizing Section 8 assistance for mortgage expenses. The CDA intends to submit a Section 32 Homeownership Plan to the HUD Special Applications Center. The plan will include 12 scattered-site housing units currently within the CDA's West Site (AMP 300), and the Plan would make Public Housing single-family dwellings available for purchase by low-income families, including Public Housing and Section 8 families.

Triangle Site redevelopment has begun with the formation of a master plan and a phased redevelopment strategy spanning the next 10 years. The plan intends to replace or substantially upgrade every unit at the Triangle, increasing the number of units from 330 to 1,200 units. The CDA Board is expected to adopt *Our Triangle Taking Shape* on August 10, 2023 and authorize staff to enter into a development agreement for Phase 1 design, approvals, tenant engagement, and pre-development work. A CDA development team will prepare and submit Phase 1 Low-Income Housing Tax Credit application in January, 2024.

The CDA is an active participant in the City of Madison's Interagency Housing Team, which focuses on affordable housing strategies.

#### Goal 2: Improve the quality of assisted housing

#### **Objectives:**

- Renovate and/or modernize Public Housing and Multifamily Housing units
- Pursue energy efficiency improvements
- Identify and implement sustainable practices to minimize impacts on the environment

#### **Initiatives:**

The CDA strives to achieve HUD Physical Assessment Subsystem (PASS) scores of no less than 40 points. The purpose of the PASS is to determine whether public housing units are decent, safe, sanitary and in good repair, and to determine the level to which the CDA is maintaining its public housing in accordance with housing condition standards. Physical inspections are conducted each year by independent, HUD-contracted inspectors in accordance with HUD's Uniform Physical Condition Standards (UPCS). The assessment of each CDA development involves inspection areas of site, building exterior, building systems, common areas, and dwelling units. HUD suspended inspections in 2020 due to COVID-19 with 2019 PASS scores carrying over through 2021. HUD began physical inspections in 2022 at the CDA's East Site. The CDA's received an overall PASS score of 30 for 2022. PASS scores have been issued in 2023 as follows:

| Physical Assessment Subsystem (PASS) Scores |      |      |        |      |      |
|---|------|------|--------|------|------|
|   | 2019 | 2020 | 2021   | 2022 | 2023 |
| East Site                                   | 19.2 | 19.2 |        | 24.0 | 24.0 |
| West Site                                   | 34   | 34   |        | 34   | 31.6 |
| Triangle Site                               | 35.2 | 25.2 | COVID  | 25.2 | 35.2 |
| Truax Phase 1                               | 29.2 | 29.2 | Waiver | 29.2 | 26.8 |
| Truax Phase 2                               | 34.8 | 34.8 |        | 34.8 | 22.4 |

Evaluating the long-term physical needs of Public Housing property helps the CDA in making decisions about the viability, positioning, and obsolescence of the property. The Green Physical Needs Assessment (GPNA) is a HUD requirement of all Housing Authorities and includes the completion of a Physical Needs Assessment (PNA) and an Energy Audit (EA) once every 5 years. In 2020, the CDA completed and submitted to HUD its PNA and EA through HUDs Green Physical Needs Assessment (GPNA) Tool:

- The PNA is a systematic review of all the major physical components of the CDA's Public Housing property and is used to develop a long-term plan for addressing the costs of replacement of the components as they wear out.
- The EA is a standardized, practical approach in identifying cost effective energy conservation measures and reducing both capital and operating costs. The EA reviews project costs, savings, and payback periods related to a variety of energy conservation measures, including reduction in utility and energy consumption. The EA may include "green measures" that do not save energy, but may provide information on environmental or potential health benefits of green measures, such as air quality and pest management.
- The Green Physical Needs Assessment (GPNA) Tool was developed by HUD and provides an instrument for the CDA to record and organize PNA data. The GPNA serves as a beginning point for other types of evaluations, such as preventative maintenance plans, marketing studies, health and safety evaluations, appraisals, replacement reserve studies, or a number of other real estate analyses. The GPNA is intended to reflect life cycle cost covering a 20-year period.

The CDA continues to participate in the Madison Gas & Electric (MGE) Shared Solar program. Through the program, the CDA is able to reserve a portion of the electricity produced from the Share Solar arrays with a stable electric rate for the next 25 years. The Program involves an up-front participation fee and paying MGE's established rate for the solar energy. The CDA entered into a Memorandum of Understanding with RENEW Wisconsin, Inc. who paid the CDA's share of up-front participation fees. Participation in the Shared Solar Program will allow the CDA to offer the benefits of cost-effective, locally generated solar energy to the residents of Romnes and Karabis Apartments without installing solar on the property.

The CDA applied for a State of Wisconsin grant for solar energy at Truax Park Apartments. Although the grant was not awarded, the project is expected to take place in 2024 through the City of Madison, where an allocation of City funding will be used to install solar panels on several buildings at the CDA's Public Housing Truax campus. This initiative intends to reduce energy costs for the CDA and the residents at Truax Park Apartments.

#### Goal 3: Improve the quality of life for program participants

#### **Objectives:**

- Ensure CDA supportive services, and housing and unit types, meet the needs of the evolving population
- Through policy and partnerships, create vibrant living environment initiatives to ensure CDA developments are healthy and safe places to live
- Improve resident services across CDA programs and housing communities
- Increase the number of residents who can affordably access the internet
- Create a lasting social impact through support of resident associations, a thriving resident advisory board, and resident voice

#### **Initiatives:**

Many CDA tenants experienced financial hardship related to the COVID-19 pandemic. The CDA worked promptly adjusting rent for tenants who reported reductions in income. CDA Property Managers also continue to create repayment agreements with any resident who has not paid rent, and residents were connected to the Dane County CORES program for rental and utility assistance. As of June, 30, 2023, the CDA received \$1,041,853 in rental assistance on behalf of CDA tenants who were approved for CORE assistance.

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. A Public Housing funded Tenant Services Aide was also hired in 2020 to service Public Housing tenants at the CDA's West Site. CDA Service Coordinators continued to check-in on residents and to provide resources such as food, mental health referrals, and rental assistance programs.

In May 2023, the CDA hired a Tenant Social Services Coordinator, who provides crisis intervention, community agency liaison and referral, and direct services to CDA residents, including short-term case management, assistance and information on interpersonal problem resolution, and safety education.

To further its mission to provide decent, safe, and sanitary housing to low-income residents of the City of Madison, the CDA continues to maintain the newly created public safety and security program at its Public Housing and Multifamily Housing properties. The CDA's professional security contractor provides on-site security services.

Through a partnership with the University of Wisconsin, Triangle Residents benefit through peer support and health related programs. Each spring and fall semester, students from UW Madison's Badger Volunteer Program volunteer 1 to 2 hours weekly. Programs include healthy food and movement classes, isolation intervention, and technology related classes.

The CDA Resident Advisory Board (RAB) met twice in 2022 to review the CDA's 2023 Annual Plan and to review the CDA's Capital Fund Plans. The Truax Neighborhood Association (TNA) continues to meet quarterly each year, and the CDA's Triangle Site will be holding an election in 2023 in an effort to create a resident association at the CDA's Triangle site.

The CDA continues to provide information to residents about low cost internet as provided by the new Federal Communications Commission Affordable Connectivity Program (ACP). The ACP opened on December 31, 2021, is available to those who participate in the Public Housing Program, and also provides devices. Eligible households can enroll through participating broadband providers or by submitting an application directly to the ACP. In addition, four (4) tenants at the CDA's West Site participated in an Internet Service Grant initiative through New Bridge Madison. The grant intends to help older adults obtain free internet service for up to one year, including help with obtaining a computer device.

#### Goal 4: Promote self-sufficiency and economic opportunity

#### **Objectives:**

- Increase the number of employed persons in assisted housing
- · Support resident capacity-building and self-sufficiency initiatives to help residents meet their own goals
- Provide and attract supportive services to increase independence for elderly or disabled households
- Create a Section 3 Resident Employment & Opportunity Program

#### **Initiatives:**

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. In 2023, there were two (2) new families added to the FSS program. Although a program participant may fail to meet the obligations under the FSS program, the CDA is prohibited from terminating the family's Section 8 assistance based on the outcome of FSS participation. Since the program began in 2010, FSS activity is as follows:

|                    | Family Self Sufficiency (FSS) Program |   |    |  |  |
|--------------------|---------------------------------------|---|----|--|--|
| Total FSS Activity |                                       |   |    |  |  |
| 55                 | 14                                    | 9 | 32 |  |  |

The CDA continues to maintain its Resident Opportunity and Self-Sufficiency (ROSS) grants. A ROSS Service Coordinator continues to provide supportive services for self-sufficiency to residents of the CDA's East and West Site developments. Successes and highlights for 2023 include:

- Referred residents to community agencies supporting access to internet service discounts, childcare assistance, tax preparation services, and transportation assistance
- Enrolled residents in Affordable Connectivity Program
- Prevented evictions by assisting residents in completing and requesting additional funding requests through the Dane County CORE Emergency Rental Assistance Program
- Engaged in economic development by referring residents to employers, job fairs, and job skills trainings
- Completed housekeeping check-ins and inspections to ensure resident compliance
- Assisted residents with transportation barriers and in obtaining a driver's license
- Provided welcome baskets to residents
- Assisted residents with childcare obstacles
- Provided interpretation assistance for Spanish speaking residents
- Conflict resolution among CDA residents and management
- Assisted residents in applying for part-time and full-time employment
- Provided interview clothing and work clothing to program participants for their new job

#### Goal 5: Maintain Fiscally Responsible Operations and financial Sustainability

#### **Objectives:**

- Maximize the CDA's current resources for housing programs
- Create a sustainable and diversified funding model that is adaptive to external challenges and opportunities
- · Practice asset management principles through project-based accounting and management of CDA housing
- Utilize Capital Funds for capital improvements vs. operating costs
- Adopt administrative rule and procedures meant to reduce administrative costs, increase program efficiency, improve tenant benefits, or foster self-sufficiency
- Implement procurement policies
- Implement functioning inventory management system
- Implement energy efficient cost saving measures on all properties

#### **Initiatives:**

The CDA's Section 8 voucher authority increased in 2022 and in 2023 with 10 additional Veterans Affairs Supportive Housing vouchers, 23 Fair Share vouchers, and 10 Stability vouchers.

The CDA Board adopted formalized financial policies which define the Board's intent for the administration and stewardship of CDA resources. The CDA Financial Policies delegate limited authority from the CDA Board to the CDA Finance Subcommittee. The CDA Financial Policies provide rules and procedures related to cash handling, cost allocation, reserves, capitalization, and procurement. The CDA Finance Subcommittee meets quarterly to review financial statements and annual audit documents as submitted by an independent public accounting firm.

Each year, the CDA strives for a HUD Financial Assessment Subsystem (FASS) score of 25. The purpose of FASS is to measure the financial condition of each public housing project. FASS measures liquidity, adequacy of reserves and capacity to cover debt. Scores are as follows, with 2022 final scores not available at this Annual Report submission:

| Financial Assessment Subsystem (FASS) Scores Based on Audited Financials |       |       |       |       |      |
|--|-------|-------|-------|-------|------|
|  | 2018  | 2019  | 2020  | 2021  | 2022 |
| East Site  | 23.00 | 23.00 | 20.65 | 20.17 |      |
| West Site  | 21.65 | 22.96 | 21.72 | 21.27 |      |
| Triangle Site  | 25.00 | 25.00 | 25.00 | 25.00 |      |

#### Goal 6: Provide highest quality of governance and services

#### **Objectives:**

- Deliver top quality service to customers
- Improve CDA image and reputation
- Create and maintain an inclusive and safe working environment
- Maintain High Performer status in the Public Housing and Section 8 Housing Choice Voucher programs
- Attract and retain the best qualified employees, provide opportunities for employees to perform at their best, recognize employee contributions, and maintain succession plans
- Improve CDA operations, costs, and communications through automation, technology upgrades and continuous process improvements
- Ensure effective CDA Board governance

#### **Initiative:**

In 2021 and 2022, the CDA experienced a large number workforce retirements, and subsequently hired 9 new staff in 2022 and 6 new staff in the first half of 2023. In 2022, the CDA began the process of re-organizing its staffing structure. The plan was finalized in 2023 and brings in three (3) new senior management positions: Property Operations Manager, Client Services Manager, and Administrative Manager. These new positions will provide additional management expertise which allow the CDA to focus on redeveloping its Public Housing properties, repositioning the Public Housing subsidy platform, increasing the number of low-income housing tax credit properties, and new homeownership programs, as well as improvements in automation, technology upgrades and program performance. The CDA will work in collaboration with City of Madison Human Resources to create the new positions and complete the recruitment process. Maintenance Career Laddering efforts continue with four maintenance Staff completing training.

The CDA implemented an annual employee check-in process to provide discussion on performance expectations and how to best meet the CDA's goals. The new process allows for employees and supervisors to talk about the important work of the CDA with a focus on core expectations of service, communication, teamwork, equity and inclusion, and stewardship.

The CDA formed a Safety Task Force in 2022. The team is currently working on updating CDA Safety Policies, including the implementation of safety procedures and safety training through the City of Madison's Safety Coordinator.

To improve community awareness of the CDA, work began in 2020 to create a CDA social media strategy development plan. To date, the CDA has created the infrastructure for social media, has implemented a corporate Facebook page, and has provided appropriate Staff with training to allow for regular content maintenance of the CDA's Facebook page.

CDA Board of Commissioners participated in HUD's Lead the Way on-line training. Lead the Way training is designed to inform board commissioners on the fundamentals of oversight, roles and responsibilities of a Public Housing Authority board and staff functions, and public housing basics. Curriculum includes: asset management, Housing Choice Voucher program, budgets, ethics, assessing the PHA, knowing the PHA, and preventing sexual and other discriminatory harassment in housing.

### **Goal 7: Ensure Equal Opportunity and further non-discrimination in CDA housing Objectives:**

- Ensure equal access to assisted housing
- Ensure a suitable living environment for all families living in assisted housing
- Ensure accessible housing to persons with disabilities
- Ensure equity in organizational values

#### **Initiative:**

The CDA hired a Hearing and Reasonable Accommodation Specialist in 2020, who received Fair Housing Specialist and Hearing Officer certification. Having a dedicated staff person assigned to work on reasonable accommodation requests contributes to a reduced processing time for reasonable accommodation requests and ensures consistency with fair housing law:

| CDA Reasonable Accommodation Requests |                 |                                 |  |
|---------------------------------------|-----------------|---------------------------------|--|
| Year                                  | Number of Cases | Average Days<br>Processing Time |  |
| 2020                                  | 69              | 43                              |  |
| 2021                                  | 159             | 24                              |  |
| 2022                                  | 146             | 27                              |  |

The CDA continues to provide appeal and grievance hearings for applicants and program participants, and customers have the option to participate remotely.

Fair Housing posters are displayed at all CDA offices, and CDA customers are provided access to discrimination complaint forms through the CDA's website.

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. All CDA employees are required to attend City of Madison Prohibited Harassment & Discrimination training (APM 3-5) within the first 45 days of hire, and every three (3) years thereafter. CDA Supervisors and Managers must attend Prohibited Harassment & Discrimination training every three (3) years, including a separate Mandatory Reporter training. The Supervisory level training focuses on good management practices and policies requiring the maintenance of an environment that is free of discriminatory harassment, and the Mandatory Reporter training places emphasis on increasing sensitivity to what constitutes a problem and why an immediate, constructive response is important.

The CDA's Civil Rights Coordinator continues to manage the CDA's Equitable Work Force Plan and provides guidance to CDA hiring managers in recruitment efforts for "red flag" positions. The Red-Flag process is an Affirmative Action procedure adopted by the City of Madison in its General Ordinances and its Affirmative Action Plan to minimize cultural, racial, gender and disability differences between interviewers and interviewees and the evaluation of job candidates' application materials. The CDA Civil Rights Coordinator also assists with Prohibited Harassment and/or Discrimination training and complaint investigations; ensures that staff have access to language-line services, translation, and interpretation services; identifies equity training needs within the CDA; and provides referrals to support the City of Madison's Multicultural Affairs Committee, Women's Initiative Committee, and Latino Community Engagement Team.

#### **Goal 8: Violence Against Women Act Compliance**

☐ See next page for RAB comments and CDA responses.

#### **Objectives:**

- Maintain compliance with all applicable legal requirements imposed by the Violence Against Women Act (VAWA)
- Ensure the physical safety of victims of actual or threatened domestic violence, dating violence, sexual assault, or stalking
- Take appropriate action in response to an incident or incidents of domestic violence, dating violence, sexual assault, or stalking, affecting individuals receiving CDA housing assistance.

#### **Initiatives:**

Although the VAWA 2022 statute does not specifically include human trafficking in the list of victims protected under VAWA, in 2022 HUD began including human trafficking as part of the list of victims protected under VAWA (as seen in Notices PIH 2022-06, PIH 2022-22, and PIH 2022-24). In the absence of a final rule implementing VAWA 2022 and to mirror HUD's recent usage, the CDA is recognizing human trafficking in addition to domestic violence, dating violence, sexual assault, and stalking and is in the process of updating its policy documents to reflect the addition of victims of human trafficking.

The CDA continues to follow the Violence Against Women Act (VAWA) provisions, which provide special protections for victims of domestic violence, dating violence, sexual assault, and stalking who are applying for or receiving CDA housing assistance. The CDA's VAWA policies provide for notification, documentation, and confidentiality. Specific VAWA policies are provided as related to eligibility, occupancy standards and unit offers, family breakup, leasing and inspections, emergency transfers, and terminations. The CDA also provides a waiting list preference for victims of domestic violence under its Section 8 program.

The CDA 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. VAWA notices and forms are provided to applicants who are denied admission to a CDA housing program, and to program participants when the CDA issues a notice of termination. VAWA information may also be found on the CDA's Website including victim resource resources and CDA VAWA forms.

To reduce crime and maintain safety, including VAWA related incidents, the CDA maintains a contract for security services at its Public Housing Sites. The CDA's safety goals are to enhance the quality of life for residents living in Public Housing, by working cooperatively with residents, staff, the public, and law enforcement to preserve the peace, reduce crime, and provide for a safe environment. The CDA follows its VAWA emergency transfer policies and provides related-supportive service referrals to victims of domestic violence, dating violence, sexual assault, or stalking.

Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. **B.4** 

|     | See attached HUD 500/5.2, Capital Fund Program Five Year Action Plan, approved by HUD on 6/12/2023 |
|-----|--|
| B.5 | Most Recent Fiscal Year Audit.   |
|     | (a) Were there any findings in the most recent FY Audit?   |
|     | Y N □ ⊠  |
|     | (b) If yes, please describe:   |
| C.  | Other Document and/or Certification Requirements.  |
| C.1 | Resident Advisory Board (RAB) Comments.  (a) Did the RAB(s) have comments to the PHA Plan?         |
|     |  |

## Resident Advisory Board (RAB) Meeting CDA PHA Plan for Year 2024 September 19, 2023

RAB Members Present: John Beeman, DeWayne Gray, Malinda Sloan

CDA Staff Present: Lauren Andersen, Lisa Daniels, Bryce Gruner, and Larry Kilmer II

CDA Staff provided an overview of the 2024 PHA Plan and Capital Fund Plans, and responded to RAB member questions and suggestions for future plans. Upon further analysis of the RAB's comments, the CDA also provides additional response information below.

#### 2024 PHA Plan Review and RAB Comments

1. When a resident chooses flat rent and doesn't have to complete another recertification for three years, why does the flat rent amount change? Can that information be made more clear to residents/flat renters?

CDA Response: Flat rent amounts fluctuate based on fair market rents. The CDA is required to ask all residents annually if they would like to continue to pay the flat rent amount or undergo a full recertification of income. The CDA will work to make sure that the information regarding the fluctuation of flat rent amounts is communicated more clearly to residents.

2. Are there any future plans for the CDA to fund tenant laundry as it is really expensive?

CDA Response: The CDA has no plans to fund tenant laundry.

Additional CDA Response: The CDA will continue to maintain laundry facilities as economical as possible, including preventative maintenance. Future redevelopment activities will look to reduce the cost of electricity and maintenance. The CDA will also look to create informational signage in laundry rooms to promote ways to save money (e.g. wash with cold water, wash full loads, use dryer balls, and dry right size loads)

3. How does a tenant request to move to a single-family home?

CDA Response: Tenants may request to transfer to a different Public Housing unit, including a Public Housing single-family home. A request to transfer would fall under the CDA's general transfer policy. The majority of the single family homes designated under the CDA's Section 32 Homeownership Program are 3-bedroom units. A one-person household would not be able to transfer to a 3-bedroom unit (single family home) under the CDA's occupancy standard of two-persons per bedroom.

4. What will the CDA do to ensure that Karabis and Parkside residents do not get lost in the shuffle during Triangle redevelopment?

CDA Response: The annual plan is a requirement of the Public Housing program. Karabis and Parkside are under the Multifamily Housing and are subject to Section 8 (bb). Triangle redevelopment will be designed so that current residents can live in new units successfully, including Karabis and Parkside residents. If a tenant is qualified to be living in either Public Housing or multifamily housing, they will continue to be qualified to live in the new housing through redevelopment activities.

5. How will Karabis and Parkside be affected during new construction?

CDA Response: The first new building will be placed where the current dirt pile sits for the Bayview project, and will also take place on part of the Brittingham parking lot.

6. Will Karabis and Parkside be updated and will someone be talking to those residents?

CDA Response: Brittingham residents are estimated to move into a new building in the year 2026 as part of Phase 1. Gay Braxton, Karabis, and Parkside residents are estimated to move into a new building in the year 2028 as part of phase 2, which provides time for resident engagement.

7. There is a blind spot at the end of the court at Truax and there are a lot of families with young kids living at the property. Is it possible to install "Slow Down" or "Slow Children at Play" warning signs?

CDA Response: The East Site Manager has been made aware of this request and is looking into the situation and for a best solution.

8. A building at Truax was damaged by a storm last year. When is the building going to be completed?

CDA Response: The CDA expects the repairs to be completed by mid-November.

#### **Review of Capital Fund Program Plans and RAB Comments**

#### 1. Can Capital Funds be used for WIFI?

CDA Response: Capital Funds can be used to maintain WIFI, but not to install WIFI. However, we are not certain that this information is entirely accurate. CDA Staff will check further into the use of Capital Funds for WIFI.

Additional CDA Response: After further review of the allowable expenses related to WIFI and internet under the Capital Fund program, the CDA found that Capital Funds can be used to update buildings to support broadband internet and WIFI but cannot pay for the actual internet service.

2. Many residents at Truax have dogs and dog stations were recently installed. Does the CDA own the field of land next to Kwik Trip and can the CDA turn that into a dog park?

CDA Response: The CDA does not own that land.

3. Can Brittingham residents have more parking spaces?

CDA Response: The CDA lost some parking due to the Bayview project which has not been completed. Parking improvements is on the radar and in the Master Plan for Triangle redevelopment.

4. Residents recommend old toilets and sink disposals be replaced at the Triangle?

CDA Response: There is a plan to replace toilets in the Triangle redevelopment plans.

5. There used to be a flower garden at the center of the circle drive at Romnes. The flower beds were removed. Is there a plan to replace the garden?

CDA Response: This would not be a Capital Fund activity, but the West Site Manager has been made aware of the request and will look into any possible resolution.

6. Residents recommend security cameras be added, facing the parking lot, at the end of the court at Truax

CDA Response: This is in process with CDA Staff currently putting together a security camera package for the East Site.

7. Squirrel are getting into the siding at Romnes. CDA Maintenance patches, but the squirrels keep getting in. Are there any plans for siding improvements?

CDA Response: The CDA is looking at maintenance free siding, which will negate pest issues. A new roof and windows are also part of the project. Staff expect to go out for bid early next year.

#### The CDA also received the following Public comment on the PHA Plan:

#### **Public Comment:**

It was mentioned that future materials for Romnes Apartments balcony replacement may be plastic. I once had a Rubbermaid plastic bird feeder and squirrels ate and ripped it apart. Perhaps metal would be better. I am otherwise very happy here and I think all staff work hard to keep this a good place to live.

#### **CDA Response:**

The CDA will investigate options for the use of durable, sustainable, and energy efficient materials in any balcony replacement project to take place at Romnes Apartments, including products designed to prevent wildlife damage.

| C.2 | Certification by State or Local Officials.  |
|-----|---|
|     | Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.   |
|     | See Attached Form HUD 50077-SL  |
| C.3 | Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.  |
|     | Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed, must be submitted by the PHA as an electronic attachment to the PHA Plan. |
|     | See Attached Form HUD 50077-ST-HCV-HP   |
| C.4 | Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. |
|     | 1. Did the public challenge any elements of the Plan?   |
|     | Y N<br>□ ⊠  |
|     | If yes, include Challenged Elements.  |
| C.5 | Troubled PHA.  (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?  Y N N/A  □ □ □ □  2. If yes, please describe:   |
|     |   |

#### D. Affirmatively Furthering Fair Housing (AFFH).

#### D.1 Affirmatively Furthering Fair Housing (AFFH).

Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

#### **Fair Housing Goal:**

#### Describe fair housing strategies and actions to achieve the goal

#### Non-Discrimination

The CDA will comply fully with all federal, state, and local nondiscrimination laws, and with rules and regulations governing fair housing and equal opportunity in housing and employment, including:

- Title VI of the Civil Rights Act of 1964
- Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988)
- Executive Orders 11063 and 13988
- Section 504 of the Rehabilitation Act of 1973
- The Age Discrimination Act of 1975
- Title II of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern)
- The Violence against Women Act (VAWA)
- The Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule, published in the *Federal Register* February 3, 2012 and further clarified in Notice PIH 2014-20
- Any applicable state laws or local ordinances and any legislation protecting individual rights of tenants, applicants, or staff
  that may subsequently be enacted

When more than one civil rights law applies to a situation, the laws will be read and applied together.

Actions to meet this goal include:

- 1. The CDA will not engage in discriminatory acts or apply discriminatory factors in administering its housing programs, including established the use of nondiscriminatory tenant selection and assignment policies.
- 2. The CDA will ensure families are aware of applicable civil rights laws by providing information to customers:
  - a. Posting of Fair Housing posters at CDA office
  - b. Distributing Fair Housing information at client briefings and lease signing meetings
  - c. Distributing Fair Housing information to landlords participating in the Section 8 program
  - d. Posting Fair Housing information on the CDA's website
  - e. Providing Reasonable Accommodation and VAWA protection information to program applicants and participants
- 3. CDA Staff will be required to attend Fair Housing training upon being hired, as well as refresher training in fair housing issues. Staff will remain informed of the importance of affirmatively furthering fair housing and providing equal opportunity to all families, including providing reasonable accommodations to persons with disabilities, as part of the overall commitment to quality customer service.
- 4. The CDA will begin to track Fair Housing trainings attended by Staff and will keep records of all training attendance.
- 5. The CDA will investigate and attempt to remedy discrimination complaints made against the CDA, including alleged VAWA violations by CDA Staff. The CDA will also advice customers of their right to file a fair housing complaint with HUD's Office of Fair Housing and Equal Opportunity (FHEO). They CDA will also keep record of all complaints, investigations, notices, and corrective actions.

#### **Fair Housing Goal:**

#### Describe fair housing strategies and actions to achieve the goal

#### **Affirmatively Furthering Fair Housing**

The CDA recognizes the City of Madison Impediments to Fair Housing Choice (AI), which identifies practices and conditions in the City of Madison that impede housing opportunity for residents because of their race, color, national origin, religion, sex, disability, or other "protected class" status. The CDA has taken meaningful action to address significant disparities in housing needs and in access to opportunity including:

- 1. The CDA Board adopted Resolution 4406, reaffirming support for equitable and just housing including identifying historic disparities and options to address the root of identified disparities in establishing redevelopment priorities and activities.
- 2. The CDA Board adopted Resolution No. 4486, incorporating a new mission statement as the prior mission statement reflected a minimalistic approach to housing operations that represents past social and economic environments. The new mission statement recognizes inclusion for local income disparities and the need for more safe and desirable housing, as well as the need for services and connecting program participants to community resources.
- 3. Leveraging funding from the City of Madison Affordable Housing Fund for the development of new affordable housing.
- 4. Establishing Section 8 payment standards which expand housing choice outside areas of poverty or minority concentration.
- 5. Distributing Emergency Housing Vouchers and Stability Vouchers, which target homeless families; and participating in the Mainstream Program, which intends to integrate formerly homeless, non-elderly persons with disabilities into the community.
- 6. Enrolling families in the Section 8 Family Self-Sufficiency (FSS) program and the Resident Opportunities and Self-Sufficiency (ROSS) program to help families achieve employment or increases in employment income.
- 7. The CDA intends to implement a HUD approved Section 32 Homeownership Plan to remove barriers to lower-income homeownership opportunities, and to provide homeownership opportunities in areas of Madison representing economic segregation.

| Chapter | Section  | Title   | Sub-Section / Description   |
|---------|----------|---|---|
|         |          | INTRODUCTION  | New Chapter introducing the ACOP, references, resources, and the PH Occupancy Guidebook   |
| 1       |          | OVERVIEW OF THE PROGRAM AND ACOP                                  | New Chapter   |
|         | PART I   | PUBLIC HOUSING<br>AGENCY  | Describes the CDA   |
|         | PART II  | PUBLIC HOUSING<br>PROGRAM   | Roles, responsibilities, and partnerships in PH   |
|         | PART III | ACOP  | Purpose and organization of the ACOP  |
| 2       |          | FAIR HOUSING AND EQUAL OPPORTUNITY                                | Removed reference to "2013" and "Reauthorization" in VAWA throughout  |
|         | 2-I.C.   | DISCRIMINATION COMPLAINTS   | Added new section covering general procedures for handling discrimination complaints  Added policy regarding complaints under the Equal Access Final Rule |
|         |          |   | Added policy regarding VAWA complaint processing  |
| 3       |          | ELIGIBILITY   | Added: "Human trafficking" to VAWA reference throughout   |
|         |          |   | Removed reference to "2013" and "Reauthorization" in VAWA throughout  |
|         |          |   | Added gender neutral pronouns throughout  |
|         | 3-II.E.  | EIV SYSTEM SEARCHES   | Revised "Income and IVT Reports" to "Income and Income Validation Tool (IVT) Reports"   |
|         | 3-III.D. | SCREENING   | Resources Used to Check Applicant Suitability - Removed credit report and utility account verification  |
|         |          |   | Added "up to three" references and clarified that the number of references requested will be conjunction with amount of rental history lacking            |
|         | 3-III.F. | PROHIBITION AGAINST<br>DENIAL OF ASSISTANCE<br>TO VICTIMS OF VAWA | Clarified human trafficking in absence of final rule and undated Notification section   |
| 4       |          | APPLICATIONS, WAITING LIST AND TENANT SELECTION                   | Added gender neutral pronouns throughout  |

|   | 4-II.C.  | OPENING AND CLOSING<br>THE WAITING LIST           | Reopening the Waiting List - Revised Notice to "The notice will inform applicants of the date, time and method for obtaining and submitting applications, a point of contact who can answer questions, any limitations on who may apply, and any other information the applicant may need to successfully submit the application." |
|---|----------|---|--|
| 5 |          | OCCUPANCY<br>STANDARDS AND UNIT<br>OFFERS         | Added: "Human trafficking" to VAWA reference throughout  |
| 6 |          | INCOME AND RENT DETERMINATIONS                    | Added gender neutral pronouns throughout   |
|   |          |   | Added: "Human trafficking" to VAWA reference throughout  |
|   | 6-I.D.   | EARNED INCOME                                     | Referenced Chapter 11 for interim reporting requirements   |
|   | 6-l.G.   | ASSETS  | Provided clarity that the CDA already set the imputed asset passbook rate and that the CDA will review the rate annually. Removed "December of each year."   |
|   |          |   | Revised the effective date of changes to the passbook rate will be determined at the time of the rate review   |
|   |          |   | Checking and Savings Accounts revised - The CDA will use the current balance in determining the value of a checking account  |
|   | 6-I.H.   | PERIODIC PAYMENTS                                 | Lump-Sum Payment - Removed "see the chapter on reexaminations for information"   |
|   |          |   | Added new section on Applying SSA COLA to Current Annual and Interim Reexaminations  |
|   | 6-II.D.  | MEDICAL EXPENSES DEDUCTION                        | Moved "Substance abuse treatment programs" to the first column in the chart  |
|   | 6-II.F.  | CHILD CARE EXPENSE DEDUCTION                      | Necessary and Reasonable Costs - Revised how reasonableness of child care costs will be established: "the CDA will use the schedule of child care costs from a qualified local entity that either subsidizes child care costs or licenses child care providers"  |
|   | 6-III.A. | OVERVIEW OF INCOME-<br>BASED RENT<br>CALCULATIONS | Added to TTP Formula - The alternative non-public housing rent [24 CFR 960.102]  |
|   |          |   | Revised CDA Policy: "The CDA's ceiling rents will equal <b>flat</b> rent plus any utility allowances"  |
|   | 6-III.B. | FINANCIAL HARDSHIPS<br>AFFECTING MINIMUM<br>RENT  | Temporary Hardship - Added "the PHA must suspend the minimum rent for the 90-day period beginning the first of the month following the date of the family's request for a hardship exemption."   |
|   | 6-III.C. | UTILITY ALLOWANCES                                | Added "Individual Relief" and subsequent policy  |
|   | 0-111.C. | OTILITI ALLOWAINCES                               | Added individual Neller and Subsequent policy  |

|   | 7-IV.C.  | DISABILITY ASSISTANCE EXPENSES                           | Removed duplicate policy. The policy appears to be listed twice.  |
|---|----------|--|---|
|   | 7-III.C. | PERIODIC PAYMENTS<br>AND PAYMENTS IN LIEU<br>OF EARNINGS | Added Social Security/SSI Benefits verification requirements. Removed CDA Policy  |
|   | 7-II.D.  | FAMILY RELATIONSHIPS                                     | Absence of Adult Member - Added: "if the CDA so requests," the family must provide evidence   |
|   | 7-II.B.  | SOCIAL SECURITY NUMBERS                                  | Added: The CDA will "not" remove and destroy copies of documentation accepted as evidence of social security numbers  |
|   | 7-II.A.  | VERIFICATION OF LEGAL IDENTITY                           | Removed: All Self certifications must be signed in the presence of a CDA representative or CDA notary public  |
|   | 7-I.E.   | SELF-CERTIFICATION                                       | Removed: All Self certifications must be signed in the presence of a CDA representative or CDA notary public  |
|   | 7-I.C.   | UP-FRONT INCOME<br>VERIFICATION (UIV)                    | Added: Income and IVT reports will be retained in the resident files "for the duration of tenancy"  |
|   | 7-I.B.   | OVERVIEW OF<br>VERIFICATION<br>REQUIREMENTS              | Requirements for Acceptable Documents - Added: CDA Staff who view the original, must make a photocopy. Removed: Family self-certifications must be signed in the presence of CDA staff or Notary. Added: Family self-certifications must be signed by the family member whose information or status is being verified |
| 7 |          | VERIFICATION   | Added gender neutral pronouns throughout  |
|   |          |  | Added: Flat Rents and Earned Income Disallowance Section  |
|   |          | HEITIS   | Added: Switching from flat rent to income-based rent due to hardship does not apply to non-public housing over income families Removed: Phasing in Flat Rents Section   |
|   | 6-III.E. | FLAT RENTS AND FAMILY CHOICE IN RENTS                    | Added: Family choice in rent does not apply to non-public housing over income families  |
|   | 6-III.D. | PRORATED RENT FOR MIXED FAMILIES                         | Added: Prorated rent does not apply to non-public housing over income families  |
|   |          |  | Added: Between annual reviews of utility allowances, the CDA will only revise its utility allowances due to a rate change, when required to by the regulation   |
|   |          |  | changes are not subject to the 60-day notice  Removed: Unless the CDA is required to revise utility allowances retroactively, revised utility allowances will be applied to a family's rent calculation at the first annual reexamination after the allowance is adopted.   |
|   |          |  | Utility Allowance Revisions - Added: The PHA must review annually the basis on which utility allowances have been established. Rate   |

| 8 |         | LEASING AND INSPECTIONS                                      | Added gender neutral pronouns throughout   |
|---|---------|--|--|
|   | PART 1  | LEASING  |  |
|   | 8-I.A.  | OVERVIEW   | Added to exceptions to non-renewal, families determined to be over income for 24 consecutive months  Added: HUD required the adoption of smoke free policies   |
|   |         |  | Added: For policies on lease requirements for families whose incomes have exceeded the over-income limit for 24 consecutive months, see 13-III.C., Over-Income Families.   |
|   | 8-I.B.  | LEASE ORIENTATION  | Deleted: "Copy of" The lead-based paint pamphlet   |
|   | 8-I.E.  | SECURITY DEPOSITS  | Revised CDA Policy. Security deposit is the higher amount of either the Security Deposit by Bedroom Size or the Total Tenant Payment   |
|   | 8-I.F.  | PAYMENTS UNDER THE<br>LEASE                                  | Late Fees and Nonpayment - Added reference to 24 CFR 9664(b)(3) and PIH Notice 2021-29   |
|   |         |  | Late Fees and Nonpayment - Added "and the CDA has not agreed to accept payment at a later date, a 30-day notice to vacate (during nationwide emergency orders) or a 14-day notice to vacate (upon expiration of nationwide emergency orders)" will be issued |
|   | 8-II.D. | INSPECTION RESULTS   | Emergency Repairs - Added to defects hazardous to life, health, or safety: In situations where the unit or building has a fuel burning appliance or an attached garage, missing or inoperable carbon monoxide detectors                                      |
| 9 |         | LEASING AND INSPECTIONS                                      | Added gender neutral pronouns throughout   |
|   |         |  | Revised "3" to "three" throughout  |
|   |         | INTRODUCTION   | Added: "With the exception of non-public housing over income families," the PHA is required to reexamine family income and composition and make adjustments accordingly  |
|   | PARTI   | ANNUAL REEXAMINATIONS FOR FAMILIES PAYING INCOME BASED RENTS |  |
|   | 9-I.A.  | OVERVIEW   | Added: The PHA may not conduct an annual reexamination for any non-public housing families over-income   |
|   | 9-I.C.  | SCHEDULING ANNUAL REEXAMINATIONS                             | Added: Reference to Chapter 2, Reasonable Accommodations   |
|   | PART II | REEXAMINATIONS FOR FAMILIES PAYING FLAT RENTS                | Revised "24 CFR 960.257(2)" to "24 CFR 960.253(f)"   |
|   |         |  |  |

| 10 |                 | PETS  | Added gender neutral pronouns throughout  |
|----|-----------------|---|---|
|    | 10-II.C.        | STANDARDS FOR PETS                                  | Added: Cat declawing is not a requirement or condition of pet ownership in public housing   |
|    |                 |   | Added: PHAs may not require pet owners to obtain or carry liability insurance   |
|    | 10-II.D.        | PET RULES   | Pet Rules - Added: The pet owner is entitled to be accompanied by another person of their choice at the meet  |
| 11 |                 | COMMUNITY SERVICE                                   | Added gender neutral pronouns throughout  |
|    | 11-I.B.         | REQUIREMENTS  | Added: Exempt Individual includes "a member of a non-public housing over-income family"   |
|    | 11-II.E.        | NONCOMPLIANCE                                       | Added: Families determined to be over-income for 24 consecutive months do not have leases renew automatically   |
|    | EXHIBIT<br>II-I | COMMUNITY SERVICE<br>AND SELF-SUFFICIENCY<br>POLICY | Added: Exempt Individual includes "a member of a non-public housing over-income family"   |
| 12 |                 | TRANSFER POLICY                                     | Added gender neutral pronouns throughout  |
|    |                 |   | Added: "Human trafficking" to VAWA reference throughout   |
|    | 12-I.B.         | EMERGENCY<br>TRANSFERS                              | Added: VAWA requires a PHA to adopt an emergency transfer plan  |
|    |                 |   | Updated VAWA Policy for emergency transfers   |
|    |                 |   | Added: Reference to CDA VAWA emergency transfer plan (Exhibit 16-3) and procedures (Exhibit 16-4)   |
|    | 12-I.C.         | EMERGENCY TRANSFER PROCEDURES                       | Updated Policy to include any condition that would produce an emergency work-order with no repair being able to be made within  |
|    |                 |   | 24 hours  Added: The CDA will provide temporary accommodations at a hotel or similar location   |
|    |                 |   | Added: The temporary accommodations are to be provided even if the family is responsible for the damage that caused the hazard or if the family is in the process of being evicted  |
|    |                 |   | Added: If the condition that caused the transfer cannot be repaired or repaired in a reasonable amount of time, the CDA will transfer the resident to the first available and appropriate unit after the temporary relocation |
|    |                 |   | Added: Emergency transfer that arise due to maintenance conditions are mandatory for the tenant   |
|    |                 |   | Added: CDA will follow VAWA emergency transfers procedures outlined in Exhibit 16-4   |
|    |                 |   | Removed: VAWA emergency transfer plan (Plan has been added as Exhibit 16-3)   |

|    | 12-I.D.   | COSTS OF TRANSFER                        | Added: CDA will bear reasonable costs of temporarily accommodating tenant and of long-term transfers, if any, due to CDA caused emergency conditions   |
|----|-----------|--|--|
|    |           |  | Defined reasonable costs to include packing, moving, and unloading   |
|    |           |  | Added: CDA will establish moving allowance based on typical costs  Added: CDA will reimburse family for eligible out-of-pocket moving  |
|    |           |  | expenses up to the moving allowance  |
|    | PART II   | PHA REQUIRED<br>TRANSFERS                |  |
|    | 12-II.B.  | TYPES OF PHA<br>REQUIRED TRANSFERS       | Added: Demolition, Disposition, Revitalization, or Rehabilitation, including RAD conversion  |
| 13 |           | LEASE TERMINATIONS                       | Added gender neutral pronouns throughout   |
|    |           |  | Added: "Human trafficking" to VAWA reference throughout  |
|    |           | INTRODUCTION                             | Revised Part II: Termination by PHA - Mandatory  |
|    | 13-II.G.  | LIFETIME REGISTERED<br>SEX OFFENDERS     | Added as a new section and clarifies the PHA must terminate assistance when it is discovered that the PHA admitted the participant erroneously after 6/25/01. Families may remove the ineligible family member if they are a lifetime registrant |
|    | 13-II.J.  | OVER INCOME<br>FAMILIES                  | Added new section on over income families  |
|    |           | TAWILLS                                  | Added new CDA policy on over income families, including Over-Income Limit, Decreases in Income, Initial Notice of Over-Income Status, Second Notice of Over-Income Status, and Final Notice of Over-Income Status                                |
|    |           |  |  |
|    | 13-III.C. | OTHER AUTHORIZED REASONS FOR TERMINATION | Removed information on Over Income Families and CDA Policy on Over Income Families as now in its own section   |
|    | 13-III.F. | TERMINATIONS<br>RELATED TO VAWA          | Added: VAWA 2022 statute does not specifically include "human trafficking' but that HUD began including human trafficking as part of the list of victims protected under VAWA  |
|    |           |  | Added: PHAs and owners may not coerce, intimidate, threaten, interfere with, or retaliate against any person exercising VAWA protections   |
|    | 13-IV.D.  | LEASE TERMINATION<br>NOTICE              | Form, Delivery, and Content of Notice - Added: all termination notices must include language provided in Appendix of Notice PIH 2021-29 during national emergency  |
|    |           |  | Revised CDA Policy to conform with state statute 704.21 and local ordinance  |
|    |           |  | Timing of the Notice - Added reference to 24 CFR 966.8 and PIH Notice 2021-29  |
|    |           |  | Timing of the Notice - Added at least 30-day notice when HUD determines a national emergency. Otherwise it is a 14-day notice  |

| 14 |           | GRIEVANCES AND APPEALS                               | Added gender neutral pronouns throughout   |
|----|-----------|--|--|
|    |           |  | Added: "Human trafficking" to VAWA reference throughout  |
| 16 |           | PROGRAM<br>ADMINISTRATION                            | Added gender neutral pronouns throughout   |
|    |           |  | Added: "Human trafficking" to VAWA reference throughout  |
|    |           |  | Removed: VAWA Reference to 2013  |
|    | PART I    | SETTING UTILITY ALLWANCES                            |  |
|    | 16-I.B.   | UTILITY ALLOWANCES                                   | Utility Allowance Revisions - Added: The review of utility allowances must include all changes in circumstances  |
|    |           |  | Revised: "The PHA may revise its allowances " to "The PHA must revise "  |
|    | 16-I.E.   | REASONABLE<br>ACCOMMODATION<br>AND INDIVIDUAL RELIEF | Added reference to 24 CFR 8 and 100, including relief from charges in excess of utility allowances on reasonable grounds (special needs, elderly, ill, or people with disabilities)    |
|    |           |  | Added: reference to Utility Allowance Guidebook, page 19 and 24 CFR 965.508, including notification of medical baseline discounts offered by local utility companies                   |
|    | PART II   | ESTABLISHING FLAT<br>RENTS                           | Revised "Notice PIH 2017-23" to "Notice PIH 2022-33" throughout  |
|    | 16-II.B.  | FLAT RENTS   | Revised "PHAs request an exception flat rent" to "PHAs apply for an exception flat rent"   |
|    |           |  | Added: PHAs demonstrate through the submission of market analysis, and analysis must be submitted on form HUD-5880   |
|    |           |  | Removed how PHAs demonstrate the need for an exception flat rent   |
|    |           |  | Added: Applying Flat Rents and CDA Policy, CDA will apply updated flat rents at each family's next annual reexamination or flat rent update after implementation of the new flat rents |
|    | PART III  | FAMILY DEBTS TO THE PHA                              | Revised "Notice PIH 2017-12" to "Notice PIH 2018-18" throughout  |
|    | 16-III.A. | OVERVIEW   | Added reference to Notice PIH 2018-18, including family requirement to reimburse PHA as related to underreported or failed to report income  |
|    |           |  | Removed list of collection alternatives  |
|    | 16-III.B. | REPAYMENT POLICY                                     |  |
|    |           |  | Family Debts to PHA - Removed CDA Policy regarding family refusal to repay the debt, enter into repayment agreement or breach of repayment agreement                                   |
|    |           |  | Added "Refusal to Enter into An Agreement" subsection, including items deleted from Overview section   |

|                 |  | Added "Repayment Agreement" subsection, including definition of repayment agreement  |
|-----------------|--|--|
|                 |  | Added: All repayment agreements must be in writing, date, and signed by both the family and the PHA  |
|                 |  | Revised "Repayment Agreements Involving Improper Payments" to<br>"Repayment Agreement Terms"   |
|                 |  | Added: All repayment agreements must be in writing, date, and signed by both the family and the PHA, including the total retroactive rent amount owed, amount of lump sum payment made at time of execution, if applicable, and the monthly repayment amount |
| PART V          | RECORD KEEPING   |  |
| 16-V.B.         | RECORD RETENTION   | Add DIA must maintain Enterprise Income Verification (EIV)   |
| 10-V.D.         | RECORD RETENTION   | Added: PHA must maintain Enterprise Income Verification (EIV) system Income Reports in the tenant file for the duration of the tenancy but for a period not to exceed three years from the EOP date, including CDA Policy to reflect this requirement        |
|                 |  | Added: VAWA complaint records to be kept for at least three years  |
| PART VII        | VAWA: NOTIFICATION,<br>DOCUMENTATION,<br>CONFIDENTIALITY |  |
| 16-VII.A.       | OVERVIEW   | Added: VAWA 2022 statute does not specifically include "human trafficking' but that HUD began including human trafficking as part of the list of victims protected under VAWA  |
| 16-VII.B.       | DEFINITIONS  | Updated "domestic violence" definition   |
|                 |  | Added "technological abuse"  |
| 16-VII.C.       | NOTIFICATION   | Added: Safety procedures for victims at risk when CDA needs to deliver documents or converse with victim. Victim may also designate another person   |
| 16-VII.D.       | DOCUMENTATION  | Removed Documentation #4, Self-Certification   |
|                 |  | Added: PHA may not require third-party verification in addition to certification form, except in circumstances of conflicting documentation  |
|                 |  | Added: CDA Policy regarding deadline extensions, and CDA will acknowledge receipt of documentation within 10 business days   |
|                 |  | Updated policy on conflicting documentation, including a timeframe, CDA denial of VAWA protections if documentation is not received within the timeframe, and right to pursue normal   |
|                 |  | appeal for denial of application or program termination  |
| EXHIBIT<br>16-3 | EMERGENCY TRANSFER<br>PLAN FOR VAWA                      | Added CDA Emergency Transfer Plan as an Exhibit (Attachment to form HUD-5382 VAWA Certification)   |
| EXHIBIT<br>16-4 | EMERGENCY TRANSFER REQUEST FOR VAWA                      | Changed Exhibit #. Formerly Exhibit 16-3   |

#### Attachment B

| Chapter | Section  | Title  | Sub-Section / Description  |
|---------|----------|--|--|
|         |          | INTRODUCTION                                     | Added introduction to new version of HCV Guidebook (7420.10G)  |
| 1       |          | OVERVIEW OF THE PROGRAM AND PLAN                 |  |
|         | 1-1.C.   | PHA MISSION                                      | Updated to reflect CDA's new mission statement   |
| 3       |          | ELIGIBILITY                                      | Edits for gender neutral language throughout   |
|         | 3-II.A.  | INCOME ELIGIBILITY AND TARGETING                 | Added low-income "continuously assisted" reference to 24 CFR 982.201(b)  |
|         | 3-II.F.  | EIV SYSTEM SEARCHES                              | Added Income Validation Tool (IVT) to title  |
|         | 3-III.C. | OTHER PERMITTED REASONS FOR DENIAL OF ASSISTANCE | Previous Behavior in Assisted Housing - Removed reference to Federal Register dated 12/29/14. Added reference to 24 CFR 984.101(d) which covers participation in an FSS program as being voluntary |
|         | 3-III.E. | CRITERIA FOR DECIDING TO DENY ASSISTANCE         | Revised: "The CDA will consider the following factors" to The CDA may consider "   |
|         |          |  | Added: The CDA is not required to make a finding as to each factor in considering circumstances  |
|         |          |  | Removed "however"  |
| 4       |          | APPLICATIONS, WAITING LIST AND TENANT SELECTION  | Edits for gender neutral language throughout   |
| 5       |          | BRIEFINGS AND VOUCHER ISSUANCE                   | Edits for gender neutral language throughout   |
|         | 5-I.B.   | BRIEFING   | Briefing Packet - Added:   |
|         |          |  | - Reference to New HCV Guidebook   |
|         |          |  | <ul> <li>In addition to providing information on Fair Housing<br/>form, the CDA will also provide information on how to<br/>complete the form and file a fair housing complaint</li> </ul>         |
|         |          |  | - CDA will also provide obligations of other special programs for which a family is participating in   |
|         |          |  | - CDA will include an explanation of the advantages to<br>moving to an area that does not have a high<br>concentration of low-income families  |
|         |          |  | - CDA will include HUD lead-based paint pamphlet<br>"Protect Your Family from Lead in Your Home"   |
|         |          |  | Additional Items Included in Briefing Packet - Remove<br>"Protect Your Family from Lead in Your Home"<br>pamphlet and added HUD EIV guide "What You Should<br>Know about EIV" pamphlet             |

| 6  |          | INCOME AND SUBSIDY DETERMINATIONS                  | Edits for gender neutral language throughout   |
|----|----------|--|--|
| 7  |          | VERIFICATION                                       | Edits for gender neutral language throughout   |
|    | 7-I.B.   | OVERVIEW OF VERIFICATION REQUIREMENTS              | Revised "Web pages" to "webpages"  |
|    |          |  | Requirements for Acceptable Documents - Removed requirement for CDA staff to "annotate the copy with the name of the person who provided the document and the date the original was viewed and sign the copy"                                      |
|    |          |  | Requirements for Acceptable Documents - Added: Self certification must be signed by the family members whose information is being verified   |
|    |          |  | Requirements for Acceptable Documents - Removed requirement to have family member sign self-certifications in the presence of a CDA Staff or notary public   |
|    | 7-I.E.   | SELF-CERTIFICATION                                 | Removed requirement for self-certifications to be signed in the presence of a CDA Staff or notary public   |
|    | 7-II.A.  | VERIFICATION OF LEGAL IDENTITY                     | Added: Certification "must" be signed by family member   |
|    |          |  | Removed requirement for self-certifications to be signed in the presence of CDA Staff or notary public   |
|    | 7-II.B.  | SOCIAL SECURITY NUMBERS                            | Revised: Once verified, the CDA will "not" remove and destroy supporting verification documentation as evidence of social security numbers   |
|    | 7-II.D.  | FAMILY RELATIONSHIPS                               | Absence of Adult Member - The family must provide evidence. Added "if the CDA so requests"   |
|    | 7-III.C. | PERIODIC PAYMENTS AND PAYMENTS IN LIEU OF EARNINGS | Added: To ensure consistency in the determination of annual Social Security and SSI income, PHAs are required to use EIV-reported Social Security and SSI benefit amounts unless the tenant disputes the EIV-reported amount [Notice PIH 2018-24]. |
|    |          |  | Revised "Web pages" to "webpages"  |
| 9  |          | GENERAL LEASING POLICIES                           |  |
|    | 9-I.A.   | TENANT SCREENING                                   | Revised: "The PHA must also inform the owner of manager <u>or</u> their responsibility" to " <u>of</u> their responsibility"   |
| 10 |          | MOVING WITH CONTINUED ASSISTANCE AND PORTABILITY   | Edits for gender neutral language throughout   |
|    | 10-II.B. | INITIAL PHA ROLE                                   | Revised: Allowable Moves under Portability - The family must inform the initial PHA which receiving PHA it has selected  |
|    |          |  | Applicant Families - Revised: "In addition, a PHA may" to "In addition, the initial PHA may "  |

|    |          |  | Initial Billing Deadline - Added: CDA late billing decisions will be based on internal factors, including CDA's leasing or funding status   |
|----|----------|--|---|
|    |          |  | Removed "notification by phone, fax, or email on the next business day." CDA confirmation on decision to honor late billing will be mailed to receiving PHA   |
| 11 |          | REEXAMINATIONS                                 | Edits for gender neutral language throughout  |
|    | 11-II.B. | STREAMLINED ANNUAL REEXAMINATIONS              | Added reference to New HCV Guidebook  |
|    | 11-II.b. | CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION    | Added: Streamlining Final Rule removes the requirement for PHAs to conduct reexamination of income whenever a new family member is added  |
| 12 |          | TERMINATION OF ASSISTANCE AND TENANCY          | Edits for gender neutral language throughout  |
|    | 12-I.E.  | MANDATORY POLICIES AND AUTHORIZED TERMINATIONS | Other Authorized Reasons for Termination of Assistance - Added reference to 24 CFR 984.101(d), which covers participation in an FSS program as being voluntary  |
|    |          |  | Insufficient Funding - Added: If the CDA stops issuing vouchers due to funding shortfall, and then resumes issuing vouchers, the CDA will issue vouchers first to the special purpose voucher families on its waiting list until it has reached the required number of special purpose vouchers |
|    |          |  | Added: Families comprising the required number of special purpose vouchers, including nonelderly disabled (NED), HUD-Veteran's Affairs Supportive Housing (HUD-VASH), and family unification program (FUP) will be the last to be terminated  |
| 13 |          | OWNERS   | Edits for gender neutral language throughout  |
|    | 13-I.D.  | OWNER QUALIFICATIONS                           | Added reference to Form HUD-52641   |
|    |          |  | Added "covered individual with direct or indirect interest in HAP contract, benefits or payments, etc. Also includes immediate family member. "Immediate family member" defined   |
|    | PART II  | HAP CONTRACTS                                  |   |
|    | 13-II.A. | OVERVIEW                                       | Added "tenant-based" to HCV program HAP contract use  |
|    | 13-II.C. | HAP CONTRACT PAYMENTS                          | Owner Certificate of Compliance - replaced "By endorsing the monthly check from the PHA" with "By accepting the monthly check"  |
| 15 |          | SPECIAL HOUSING TYPES                          | Edits for gender neutral language throughout  |
|    |          | INTRODUCTION                                   | Added reference to New HCV Guidebook  |

|           |  | Added: A single unit cannot be designated as more than one type of special housing. The PHA cannot give preference to households that wish to live in any of these types of housing and cannot require households |
|-----------|--|---|
|           |  | to select any of these types of housing [New HCV GB, Special Housing Types, p. 3].  |
| PART 1    | SINGLE ROOM OCCUPANCY                                    | Added Reference to Form HUD-52641 and New HCV Guidebook   |
| 15-I.A.   | OVERVIEW   | Added clarification on HUD-52641 with the Special Housing Type specified in Part A of the HAP contract  |
| 15-I.C.   | HOUSING QUALITY STANDARDS                                | Added SRO HQS standards exceptions  |
|           |  | Added "large" common areas to Fire Safety standard  |
|           |  | Revised: Sanitary facilities must be reasonably accessible from a common hall or passageway to all person sharing them  |
| PART II   | CONGREGATE HOUSING                                       | Added Reference to Form HUD-52641 and New HCV Guidebook   |
| 15-II.A.  | OVERVIEW   | Added clarification on HUD-52641 with the Special Housing Type specified in Part A of the HAP contract  |
| 15-II.B.  | PAYMENT STANDARD, UTILITY ALLOWANCE, AND HAP CALCULATION | Revised: The payment standard is based on the number of rooms in the private living area for the assisted family  |
| 15-II.C.  | HOUSING QUALITY STANDARDS                                | Removed numbering in series within the sentence   |
|           |  | Added: The congregate housing must contain adequate facilities and services for the sanitary disposal of food waste and refuse, including facilities for temporary storage where necessary.                       |
|           |  | Added: Lead-based paint HQS only applies to children under the age of six who are expected to live in the unit  |
| PART III  | GROUP HOME   | Added Reference to Form HUD-52641 and New HCV Guidebook   |
| 15-III.A. | OVERVIEW   | Added: Group home is a state-approved facility  |
|           |  | Added clarification on HUD-52641 with the Special Housing Type specified in Part A of the HAP contract  |
| 15-III.B. | PAYMENT STANDARD, UTILITY ALLOWANCE, AND HAP CALCULATION | Added: family unit size is the voucher size   |
|           |  | Added: The number of persons in the assisted household equals one assisted person plus any PHA-approved live-in aide.   |
|           |  | Revised Prorata share of utility allowance for group home to include family units size  |
|           |  | Revised "the PHA should consider whether sanitary facilities and facilities for food preparation and service are " to "the PHA must consider "  |
| 15-III.C. | HOUSING QUALITY STANDARDS                                | Added: The entire unit must comply with HQS   |

|           |  | Added: Doors and windows accessible from outside must be lockable  |
|-----------|--|--|
|           |  | Added: Site and Neighborhood should be free from disturbing noises and reverberations  |
|           |  | Added: Lead-based paint HQS only applies to children under the age of six who are expected to live in the unit   |
| PART IV   | SHARE HOUSING  | Added Reference to Form HUD-52641 and New HCV Guidebook  |
| 15-IV.A.  | OVERVIEW   | Added the benefits to families and the PHA described   |
|           |  | Added: The unit may be a house or an apartment   |
|           |  | Added reference to Notice PIH 2021-05  |
|           |  | Added ways to assist families in finding shared housing noted  |
|           |  | Added local legal barriers and ways to work with local jurisdiction noted  |
|           |  | Added clarification on HUD-52641 with the Special Housing Type specified in Part A of the HAP contract   |
| 15-III.B. | PAYMENT STANDARD, UTILITY ALLOWANCE, AND HAP CALCULATION | Added: family unit size is the voucher size  |
|           |  | Added: Space is considered non-shared space  |
|           |  | Updated example prorata payment standard   |
|           |  | calculation  |
|           |  | Added: The HAP for a family in shared housing is the lower of the payment standard minus the TTP or the gross rent minus the TTP                       |
|           |  | Added: The utility allowance for an assisted family living in shared housing is the prorata share of the utility allowance for the shared housing unit |
|           |  | Updated example prorata utility allowance calculation  |
|           |  | Revised: "the PHA should consider whether sanitary and food preparation areas are private or shared " to "the PHA may "                                |
| PART V    | COOPERATIVE HOUSING                                      | Added Reference to Form HUD-52641 and New HCV Guidebook  |
| 15-V.A.   | OVERVIEW   | Added: Monthly carrying charge   |
|           |  | Added clarification on HUD-52641 with the Special Housing Type specified in Part A of the HAP contract   |
|           |  | Added: Gross rent is the monthly carrying charge for the unit, plus any utility allowance  |
| 15-V.C.   | HOUSING QUALITY STANDARDS                                | Added: PHA remedies under 24 CFR 982.404 do not apply  |
|           |  | Added: No housing assistance payments will be made unless the unit meets HQS and defects are corrected per Chapter 8                                   |
| PART VI   | MANUFACTURED HOMES                                       | Added Reference to Form HUD-52641 and New HCV Guidebook  |

| 15-VI.A.  | OVERVIEW  | Revised: Ways to occupy manufactured homes from two to three  |
|-----------|---|---|
|           |   | Added: purchase of manufactured home through HCV homeownership  |
| 15-VI.B.  | SPECIAL REQUIREMENTS FOR<br>MANUFACTURED HOME OWNERS<br>WHO LEASE A SPACE | Added: There is a designated HAP Contract (Form HUD-52642) and Tenancy Addendum (Form 52642-A)  |
| 15-VI.C.  | PAYMENT STANDARD, UTILITY ALLOWANCE, AND HAP CALCULATION                  | Rent Reasonableness - Added: Conducted at least annually and owner acceptance   |
|           |   | Added: Owner must give PHA information on rents charged for other manufactured home spaces  |
| PART VII  | HOMEOWNERSHIP   |   |
| 15-VII.A. | OVERVIEW  | Added: The PHA may choose not to offer homeownership assistance   |
| 15-VII.B. | FAMILY ELIGIBILITY  | Added: If the homeownership option is offered, participation is optional for families   |
| 15-VII.D. | EILIGIBLE UNITS   | Deleted: The unit must be under construction or already exist at the time the family enters into the contract for sale  |
|           |   | Added: Families may enter into contracts for sale for units not yet under construction. Added parameters to commence homeownership assistance   |
| 15-VII.G. | HOME INSPECTIONS, CONTRACT OF SALE, AND PHA DISAPPROVAL OF SELLER         | Added requirements for a contract for sale when the unit is not yet under construction  |
| 15-VII.I. | CONTINUED ASSISTANCE REQUIREMENTS; FAMILY OBLIGATONS                      | Added: family must execute a statement of family obligations (Form HUD-52649)   |
|           |   | Added: Family must provide PHA with information on any satisfaction or payment of the mortgage debt   |
| 15-VII.K. | HOMEOWNERSHIP ASSISTANCE PAYMENTS AND HOMEOWNERSHIP EXPENSES              | Deleted where PHA payments are directed   |
|           |   | Deleted timeframe for termination of payments   |
|           |   | Revised "Homeownership expenses only include amounts " to "Homeownership expenses must include amounts "  |
|           |   | Added: The PHA does not have the discretion to exclude any of the listed homeownership expenses or to add any additional items  |
|           |   | Added: The PHA may pay the homeownership assistance payments directly to the family, or at the PHA's discretion, to a lender on behalf of the family. If the assistance payment exceeds the amount due to the lender, the PHA must pay the excess directly to the family. |
| 15-VII.M. | MOVING WITH CONTINUED ASSISTANCE  | Added: PHA must determine that all initial requirements have been satisfied   |

|    |           |   | Added: VAWA provisions apply  |
|----|-----------|---|---|
|    | 15-VII.N. | DENIAL OR TERMINATION OF ASSISTANCE     | Added: Homeownership assistance automatically terminates 180 calendar days after the last assistance payment. The PHA may grant relief if termination results in extreme hardship   |
| 16 |           | PROGRAM ADMINISTRATION                  | Edits for gender neutral language throughout  |
|    | PART I    | ADMINISTRATIVE FEE RESERVE              | Added referenced to PIH Notice 2022-18 (security deposit assistance, landlord recruitment, incentive payments as allowable expenses)  |
|    | PART II   | SETTING PROGRAM STANDARDS AND SCHEDULES |   |
|    | 16-II.B.  | PAYMENT STANDARDS                       | Revised "The CDA will review the availability of units for each unit size" to "The CDA may review"  |
|    |           |   | Revised "The CDA will consider the percentage of families that are unable to locate suitable housing" to "The CDA may consider"   |
|    |           |   | Exception Payment Standards - Referenced FR Notice 9/27/21, including VASH exception payment standard   |
|    | PART IV   | OWNER OR FAMILY DEBTS TO THE PHA        |   |
|    | 16-IV.A.  | OVERVIEW                                | Added: At its discretion, a PHA may offer a family a repayment agreement, if the family breaches an agreement to pay amounts owed to a PHA  |
|    |           |   | Removed available collection alternatives for the CDA   |
|    | 16-IV.B.  | REPAYMENT POLICY                        | Added available CDA collection alternatives (as previously in "Overview")   |
|    |           |   | Added: Families are required to reimburse the PHA if they were charged less rent than required because the family either underreported or failed to report income. PHAs are required to determine retroactive rent amounts as far back as the PHA has documentation of family unreported income |
|    |           |   | Added: If the family refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, the PHA must terminate assistance. In addition to termination, the CDA will utilize available collection alternatives   |
|    |           |   | Replaced PIH Notice 2017-12 with PIH Notice 2018-18  Added: All repayment agreements must be in writing,  |
|    |           |   | dated, and signed by both the family and the PHA  |
|    |           |   | Changed Title: "Repayment Agreements Involving Improper Payments" to "Repayment Agreement Terms"  |
|    |           |   | Added: All repayment agreements must be in writing, dated, signed by both the family and the PHA, include the total retroactive rent amount owed, any amount of lump sum payment made at time of execution, if applicable, and the monthly repayment amount                                     |

|    | PART V     | SECTION 8 MANAGEMENT<br>ASSESSMENT PROGRAM                                      |  |
|----|------------|---|--|
|    | 16-V.C.    | SEMAP INDICATORS  | Indicator 1: Selection From The Waiting List - "Sample" changed to "Samples" Indicator 2: Rent Reasonableness - Revised: the rent to owner is reasonable based on current rents for comparable unassisted units at the required times Indicator 9: Annual Reexaminations - Revised: Based on the percent of reexaminations that are less than two months overdue Indicator 11: Pre-Contract HQS Inspections - Revised: |
|    |            |   | Passed HQS inspections on or before the effective date of the lease and HAP contract   |
|    | PART VI    | RECORD KEEPING  |  |
|    | 16-VI.B.   | RECORD RETENTION  | Added reference to 24 CFR 908.101  |
|    |            |   | Added: The PHA must keep the last three years of the Form HUD-50058 and supporting documentation during the term of each assisted lease, and for a period of at least three years from the end of participation (EOP) date   |
|    |            |   | Added: The PHA must maintain Enterprise Income<br>Verification (EIV) system Income Reports in the tenant<br>file for the duration of the tenancy but for a period not<br>to exceed three years from the EOP date   |
|    | PART VIII  | DETERMINATION OF INSUFFICIENT FUNDING   |  |
|    | 16-VIII.B. | METHODOLOGY   | Added "funding reserves" to what is considered insufficient funding  |
|    | PART IX    | VIOLENCE AGAINST WOMEN ACT (VAWA): NOTIFICATION, DOCUMENTATION, CONFIDENTIALITY |  |
| 17 |            | PROJECT-BASED VOUCHERS  | Added reference to FR Notice 1/24/2022 Throughout  |
|    | 17-I.A.    | OVERVIEW  | Added: Exception is for units under a HAP contract on or after April 18, 2017  Added FUPY/FYI rule on assistance covered by the 10   |
|    |            |   | percent exception  |
|    | 17-II.F.   | CAP ON NUMBER OF PBV UNITS IN EACH PROJECT                                      | Added FUPY/FYI rule on assistance covered by the exception under FSHO  |
|    | 17-/II.D.  | INSPECTING UNITS  | Added: The PHA has the option in certain mixed finance properties to rely on alternative inspections conducted at least triennially  |
|    | PART VIII  | DETERMINING RENT TO OWNER   |  |
|    | 17-VIII.A. | OVERVIEW  | Revised "five percent or greater decrease " to "ten percent or greater decrease "  |

|    | EXHIBIT<br>17-1 | PBV DEVELOPMENT INFORMATION           | Added LIHC, HOME, etc. to Mixed Finance Development information  |
|----|-----------------|---------------------------------------|--|
|    |                 |                                       | Added Structure Type, Housing Type   |
|    |                 |                                       | Added Utility Responsibility Section and Chart   |
|    |                 |                                       | Moved Supportive Services, Elderly Units, Disabled Units, FUPY/FYI and low-poverty census tract area units as bullet points under Excepted Units |
|    |                 |                                       | Removed "Utilities" under the Occupancy section, as now showing in its own section   |
| 19 |                 | SPECIAL PURPOSE VOUCHERS              | Edits for gender neutral language throughout   |
|    | PART I          | FAMILY UNIFICATION PROGRAM            | Revised "An FUP" to "A FUP" throughout the chapter   |
|    | 19-I.A.         | PROGRAM OVERVIEW                      | Added: FUP youth vouchers are limited to a period between 36 and 60 months   |
|    |                 |                                       | Added: The period of time is defined in the NOFA or NOFO   |
|    |                 |                                       | Revised Notice of Funding Availability (NOFA) to Notice of Funding Opportunity (NOFO)  |
|    | 19-I.B.         | PUBLIC CHILD WELFARE AGENCY           | Added Supportive Services Section  |
|    |                 |                                       | Revised the PCWA period for supportive service to<br>"the required time period defined in the funding<br>notice, NOFA, or NOFO"                  |
|    |                 |                                       | Added: CDA will not provide additional supportive services to what is listed   |
|    | 19-I.E.         | ASSISTANCE PERIOD                     | Added new section and referenced FR Notice 1/24/22   |
|    |                 |                                       | Maximum Assistance Period - Updated per FR Notice 1/24/22  |
|    |                 |                                       | Added: Extension of Assistance and Statutory Exceptions  |
|    |                 |                                       | Added: Education, Workforce Development, or<br>Employment Activities   |
|    |                 |                                       | Added: FSS Enrollment at 24 Months, Enrollment<br>Between 36 and 48 Months, and Enrollment After 48<br>Months                                    |
|    |                 |                                       | Added: Extensions of Assistance  |
|    |                 |                                       | Added: No FSS Program or Unable to Enroll in FSS   |
|    |                 |                                       | Added: Verification Prior to Annual Reexam   |
|    |                 |                                       | Added: Termination of Assistance for Failure to Meet Conditions  |
|    |                 |                                       | Deleted Supportive Service as it is now under Public Child Welfare Agency Section  |
|    | 19-I.F.         | REFERRALS AND WAITING LIST MANAGEMENT | No longer 19-I.E.  |
|    | 19-I.G.         | PHA HCV ELIGIBILITY DETERMINATION     | No longer 19-I.F.  |
|    | 19-I.H.         | LEASE UP                              | No longer 19-I.G.  |
|    |                 |                                       | · ·  |

|          |   | Added: Additional required briefing information (extensions of assistance, availability of FSS, and supportive services)  |
|----------|---|---|
| 19-I.I.  | TERMINATION OF ASSISTANCE               | No longer 19-I.H.   |
|          |   | Revised "36 months of housing assistance" to "statutory required time period"   |
| 19-I.J.  | FUP PORTABILITY                         | No longer 19-I.I.   |
|          |   | Revised "36 months of housing assistance" to "statutory required time period"   |
| 19-I.K.  | PROJECT-BASING FUP VOUCHERS             | No longer 19-I.J.   |
|          |   | Added reference to FR Notice 1/24/22  |
|          |   | Added: A PBV unit may only be counted towards the PHA's 10 percent exception authority under the program cap and the project's income-mixing requirement if the FUP PBV assistance is provided on behalf of an eligible youth. The PHA must amend its administrative plan to include the limitation of these FUP PBV units to eligible youth. |
| PART II  | FOSTER YOUTH TO INDEPENDENCE INITIATIVE | Removed reference to PIH Notice 2020-28 and added reference to PIH 2021-26 and FR Notice 1/24/22 throughout   |
| 19-II.A. | PROGRAM OVERVIEW                        | Updated qualified youth period as "between 36 and 60 months"  |
|          |   | Removed: Program initial availability for PHAs  |
|          |   | Revised: PHA ability to request additional vouchers beyond 25 vouchers  |
| 19-II.C. | YOUTH ELIGIBILITY CRITERIA              | Revised "FUP" to "FYI"  |
| 19-II.D. | SUPPORTIVE SERVICES                     | Revised "36 months" time period with "period of time defined in the NOFA/O"   |
| 19-II.E. | REFERRALS AND WAITING LIST MANAGEMENT   | Added CDA Policy for accepting referrals from PCWA  |
|          |   | Added Wait List reopening rules for FYI and CDA policy  |
| 19-II.F. | PHA HCV ELIGIBILITY DETERMINATION       | Added: Subject to privacy laws, the PCWA will provide available criminal history information to the CDA for consideration in determining eligibility  |
|          |   | Added: Reference to denial notice and applicant appeals in Section 3-III.F  |
| 19-II.G. | LEASE UP                                | Added briefing requirements to inform the FYI family of extensions, FSS, and supportive services  |
|          |   | Added CDA Policy to brief FYI youth individually and to provide additional 30-day extension on voucher term and Request for Tenancy Approval, upon voucher issuance   |
|          |   | Added: If a voucher fails to be used, it may be re-<br>issued to another identified eligible youth. If another<br>eligible youth is not identified, the PHA must notify   |

|           |  | HUD and HUD will reduce the HCV assistance from the PHA's baseline  |
|-----------|--|---|
| 19-II.H.  | MAXIMUM ASSISTANCE PERIOD                      | Revised voucher limit to a total of between 36 months and 60 months   |
|           |  | Added: Extension of assistance may be provided up to 24 months beyond 36-month time limit   |
|           |  | Added: Extension of assistance may be provided up to 24 months beyond 36-month time limit for FSS participation prior to 36-month expiration. Included exceptions and opportunity to still enroll in FSS  |
|           |  | Added education, workforce development, and employment activities as criteria for when a FYI is unable to enroll in FSS if the PHA is unable to offer a FSS slot  |
|           |  | Added: PHA will remind FYI voucher holder at the 24-<br>month reexamination of the education, workforce<br>development, and employment requirements   |
|           |  | Added: How a FSS slot will be offered and managed if enrollment is between 36 and 48 months   |
|           |  | Added: The CDA will not offer an available FSS slot between 48 and 60 months  |
|           |  | Added: Extensions of assistance and not to exceed 60 months of FYI  |
|           |  | Added: Extension criteria if the PHA does not carry out a FSS program or the FYI has been unable to enroll in FSS during the first 36 months of FYI assistance  |
|           |  | Added verification process for compliance   |
|           |  | Added: Failure to meet conditions of FYI impacts ability to obtain extensions of assistance, and termination of assistance is applied at the end of the applicable time limit. Number of months is calculated based on the number of months that HAP subsidy is paid. FYI must be offered an informal hearing |
| 19-II.I.  | TERMNATION OF ASSISTANCE                       | Added: The CDA will provide a Wait List preference for FYI voucher holders who are terminated due to the time limit on assistance   |
| 19-II.K.  | PROJECT-BASING FYI VOUCHERS                    | Added: The CDA may project-based certain FYI vouchers in accordance with all applicable PBV regulations and CDA policies in Chapter 17  |
| PART III  | VETERANS AFFAIRS SUPPORTIVE<br>HOUSING PROGRAM | Revised latest Federal Register as updated on 9/27/21 throughout  |
|           |  | Revised "CBOC" with "DSP" throughout  |
| 19-III.A. | OVERVIEW                                       | Added: Case management providers include a designated service provider (DSP) as approved by the VA Secretary  |

| 19-III.C. | HCV PROGRAM ELIGIBILITY      | Added: In addition to VA issued photo identification meeting identity verification, VA issued photo identification also serves as verification of Social Security Numbers and Date of Birth   |
|-----------|------------------------------|---|
|           |                              | If a family member is subject to lifetime registration under a state sex offender registration program, the remaining family members may be served if the family agrees to remove the sex offender from its family composition. This is true unless the family member subject to lifetime registration under a state sex offender registration program is the homeless veteran, in which case the family would be denied admission to the program |
| 19-III.E. | LEASING                      | Added rule on PHA's ability to obtain a payment standard exception above 120 percent of FMR upon receiving a HUD waiver   |
|           |                              | Added exception to HCV rules on prohibited units applies to both VASH tenant-based and PBV assistance   |
| 19-III.F. | PORTABILITY                  | Revised: The VAMC or DSP must first determine if the VASH family could be served by another VAMC or DSP participating in VASH and the receiving PHA has an available VASH voucher   |
|           |                              | Added portability outside of the initial VAMC or DSP's area is allowed under VAWA prior to receiving approval from the receiving VAMC or DSP  |
| 19-III.G. | TERMINATION OF ASSISTANCE    | Revised under VAWA protocols: "should" is changed to "must"   |
|           |                              | Added: the perpetrator of VAWA must be terminated from assistance   |
| 19-III.H. | PROJECT-BASING VASH VOUCHERS | Added: VASH supportive services is only needed to be provided to PBV VASH families. Non VASH PBV families and VASH PBV families not requiring case management may continue to count as an excepted PBV occupied unit  |
|           |                              | Added: One HAP contract may be used for both VASH PBVs and other PBVs in a project  |
|           |                              | Added: The PHA and owner may amend a PBV contract to re-designate a regular PBV unit as a VASH PBV unit   |
|           |                              | Added: The CDA will provide 60-days notice to the VASH family to vacate the unit upon notification from VAMC or DSP that the family has failed to participate in case management without good cause. The CDA may make exceptions to the 60-day period if needed for circumstances beyond the families control (e.g. death, serious illness, medical emergency)  |
|           |                              | Added: If a family fails to vacate a unit within the established time, the owner may evict the family. If the owner does not evict the family, the PHA must remove the unit from the HAP contract and may readd the unit back once the family vacates the property  |

| Added: The PHA may allow the family to move with its VASH voucher without having to meet the 180-day period.                           |
|--|
| Added: VASH veteran determined to no longer require case management may move with first available tenant-based voucher or VASH voucher |

# **Resident Provisions in Conversions of Assistance from**

# **Public Housing to PBRA and PBV**

This Attachment contains two sections, describing:

- 1B.1 Summary of Resident Provisions
- 1B.2 Resident Participation and Funding

#### 1B.1 Summary of Resident Provisions

The following is a summary of special provisions and alternative requirements related to tenants of public housing projects converting under RAD (including for those that will reside in non-RAD PBV units in the Covered project):

- Conversion will be considered a significant action requiring discussion in the PHA's Five-Year Plan, Annual Plan or MTW Plan or requiring a significant amendment to a PHA Plan (see Section 1.5.E. of this Notice);
- Notification of proposed conversion, meetings during the conversion process, written response to residents comments on conversion, and notification of conversion approval and impact (see Section 1.8 of this Notice);
- No rescreening at conversion (see <u>Section 1.6.C.1</u> of this Notice for conversions to PBV and <u>Section 1.7.B.1</u>. for conversions to PBRA);
- A right to return, which covers the right to return to the rent-assisted property after temporary relocation (when temporary relocation is necessary to facilitate rehabilitation or construction), or the right to occupancy of the new unit if the rental assistance is transferred to a new unit. (See <u>Section 1.4.A.5.</u> of this Notice and the RAD Fair Housing, Civil Rights, and Relocation Notice.)
- Phase-in of tenant rent increases (see <u>Section 1.6.C.3.</u> of this Notice for conversions to PBV and <u>Section 1.7.B.3.</u> for conversions to PBRA);
- Relocation protections, including procedural rights, assistance with moving, and applicable relocation payments. (See <u>Section 1.4.A.5</u> of this Notice and the RAD Fair Housing, Civil Rights, and Relocation Notice.)
- Continued participation in the ROSS-SC FSS and JobsPlus programs (see <u>Sections 1.6.C.5 and 1.6.C.9</u> of this Notice, for conversions to PBV and <u>Section 1.7.B.4</u> for conversions to PBRA);
- Continued Earned Income Disregard (see <u>Section 1.6.C.8</u> of this Notice, for conversions to PBV and <u>Section 1.7.B.7</u> for conversions to PBRA);

- Continued recognition of and funding for legitimate residents organizations (see <u>Section 1.6.C.6</u> of this Notice for conversions to PBV, <u>Section 1.7.B.5</u> of this Notice for conversions to PBRA, and below in Attachment 1B.2 for additional requirements for both programs);
- Procedural rights consistent with section 6 of the Act (see <u>Section 1.6.C.7.</u> of this Notice for conversions to PBV and <u>Section 1.7.B.6.</u> of this Notice for conversions to PBRA); and
- Choice-mobility option allowing a resident to move with a tenant-based voucher after tenancy in the Covered Project (see 24 CFR § 983.260 for conversions to PBV and Section 1.7.C.5 of this Notice for conversions to PBRA).

The foregoing is a summary of special provisions and alternative requirements relating to residents of public housing projects converting to RAD and does not attempt to capture all program requirements and details. For additional information, refer to the full text of this Notice and to the RAD Fair Housing, Civil Rights, and Relocation Notice (Notice H 2016-17; PIH 2016-17).

# 1B.2 Resident Participation and Funding<sup>98</sup>

The following provisions contain the resident participation and funding requirements for public housing conversions to PBRA and PBV, respectively.

## A. PBRA: Resident Participation and Funding

Residents of Covered Projects converting assistance to PBRA will have the right to establish and operate a resident organization in accordance with 24 CFR Part 245 (Tenant Participation in Multifamily Housing Projects). In addition, a Project Owner must provide \$25 per occupied unit annually for resident participation, of which at least \$15 per occupied unit shall be provided to the legitimate tenant organization at the covered property. Resident participation funding applies to all occupied units in the Covered Project as well as units which would have been occupied if not for temporary relocation. These funds must be used for resident education, organizing around tenancy issues, and training activities.

In the absence of a legitimate resident organization at a Covered Project, HUD encourages the Project Owner and residents to work together to determine the most appropriate ways to foster a constructive working relationship, including supporting the formation of a legitimate resident organization. Residents are encouraged to contact the Project Owner directly with questions or concerns regarding issues related to their tenancy. Project Owners are also encouraged to actively engage residents in the absence of a resident organization.

Project Owners must make resident participation funds available to residents for organizing activities in accordance with this Notice. Residents must make requests for these funds in writing to the Project Owner. These requests will be subject to approval by the Project Owner. Eligible uses of funds are the same as those permitted under "Guidance on the use of Tenant Participation Funds," Notice PIH 2013-21. The Department strongly encourages residents and Project Owners to resolve questions concerning specific uses of resident participation funds directly. If a dispute over funding arises the resident organization or Project Owner may refer any disputes over funding to the HUD Field Office for intervention only after documented efforts to at direct resolution have proven unsuccessful.

#### **B.** PBV: Resident Participation and Funding

To support resident participation following conversion of assistance, residents of Covered Projects converting assistance to the PBV program will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living

<sup>&</sup>lt;sup>98</sup> For the purposes of this Attachment, HUD uses the term "Project Owner" to refer to the owner of a Converting Project or Covered Project, as applicable to the context.

environment, which includes the terms and conditions of their tenancy as well as activities related to housing and community development.

1. Legitimate Resident Organization. A Project Owner must recognize legitimate resident organizations and give reasonable consideration to concerns raised by legitimate resident organizations. A resident organization is legitimate if it has been established by the residents of a Covered Project, meets regularly, operates democratically, is representative of all residents in the project, and is completely independent of the Project Owner, management, and their representatives.

In the absence of a legitimate resident organization at a Covered Project, HUD encourages the Project Owner and residents to work together to determine the most appropriate ways to foster a constructive working relationship, including supporting the formation of a legitimate resident organization. Residents are encouraged to contact the Project Owner directly with questions or concerns regarding issues related to their tenancy. Project Owners are also encouraged to actively engage residents in the absence of a resident organization.

- **2. Protected Activities.** Project Owners must allow residents and resident organizers to conduct the following activities related to the establishment or operation of a resident organization:
  - a. Distributing leaflets in lobby areas;
  - **b.** Placing leaflets at or under residents' doors;
  - **c.** Distributing leaflets in common areas;
  - **d.** Initiating contact with residents;
  - **e.** Conducting door-to-door surveys of residents to ascertain interest in establishing a resident organization and to offer information about resident organizations;
  - **f.** Posting information on bulletin boards;
  - g. Assisting resident to participate in resident organization activities;
  - **h.** Convening regularly scheduled resident organization meetings in a space on site and accessible to residents, in a manner that is fully independent of management representatives. In order to preserve the independence of resident organizations, management representatives may not attend such meetings unless invited by the resident organization to specific meetings to discuss a specific issue or issues; and
  - i. Formulating responses to Project Owner's requests for:
    - i. Rent increases:
    - ii. Partial payment of claims;
    - iii. The conversion from project-based paid utilities to resident-paid utilities;
    - iv. A reduction in resident utility allowances;
    - v. Major capital additions; and

vi. Prepayment of loans.

In addition to these activities, Project Owners must allow residents and resident organizers to conduct other reasonable activities related to the establishment or operation of a resident organization.

Project Owners shall not require residents and resident organizers to obtain prior permission before engaging in the activities permitted in this section.

- **3. Meeting Space.** Project Owners must reasonably make available the use of any community room or other available space appropriate for meetings that is part of the multifamily housing project when requested by:
  - **a.** Residents or a resident organization and used for activities related to the operation of the resident organization; or
  - **b.** Residents seeking to establish a resident organization or collectively address issues related to their living environment.

Resident and resident organization meetings must be accessible to persons with disabilities, unless this is impractical for reasons beyond the organization's control. If the project has an accessible common area or areas, it will not be impractical to make organizational meetings accessible to persons with disabilities.

Project Owners may charge a reasonable, customary and usual fee, approved by the Secretary as may normally be imposed for the use of such facilities in accordance with procedures prescribed by the Secretary, for the use of meeting space. A PHA may waive this fee.

**4. Resident Organizers.** A resident organizer is a resident or non-resident who assists residents in establishing and operating a resident organization, and who is not an employee or representative of current or prospective Project Owners, managers, or their agents.

Project Owners must allow resident organizers to assist residents in establishing and operating resident organizations.

**5. Canvassing.** If a Covered Project has a consistently enforced, written policy against canvassing, then a non-resident resident organizer must be accompanied by a resident while on the property of the project.

If a project has a written policy favoring canvassing, any non-resident resident organizer must be afforded the same privileges and rights of access as other uninvited outside parties in the normal course of operations. If the project does not have a consistently enforced, written policy against canvassing, the project shall be treated as if it has a policy favoring canvassing.

A resident has the right not to be re-canvassed against his or her wishes regarding participation in a resident organization.

6. Funding. Project Owners must provide \$25 per occupied unit annually for resident participation, of which at least \$15 per occupied unit shall be provided to the legitimate resident organization at the covered property. These funds must be used for resident education, organizing around tenancy issues, and training activities. Project Owners must make resident participation funds available to residents for organizing activities in accordance with this Notice. Residents must make requests for these funds in writing to the Project Owner. These requests will be subject to approval by the Project Owner. Eligible use of funds are the same as those permitted under "Guidance on the use of Tenant Participation Funds," Notice PIH 2013-21. The Department strongly encourages residents and Project Owners to resolve questions concerning specific uses of resident participation funds directly. If a dispute over funding arises the resident organization or Project Owner may refer any disputes over funding to the Contract Administrator for intervention only after documented efforts to at direct resolution have proven unsuccessful.

<sup>&</sup>lt;sup>99</sup> Resident participation funding applies to all occupied units in the Covered Project as well as units which would have been occupied if not for temporary relocation.

11. Floating Units. Upon the request of the owner to the Voucher Agency that will administer the Covered Project, HUD will permit PBV assistance to float among units within the project having the same bedroom size. A unit to which assistance is floated must be comparable in condition to the unit it is replacing (i.e., the unit must be of the same quality and amenities as the unit it is replacing). Assistance may float from a required UFAS accessible unit only to another UFAS accessible unit that has the same bedroom size and accessibility features. If assistance floats to a UFAS accessible unit as a reasonable accommodation for a household that had not previously been in a UFAS unit, the assistance may float back to a non-UFAS unit when there is no longer need for the reasonable accommodation provided the required number of UFAS units is maintained. Units that float are not specifically designated under the HAP Contract. Therefore, the requirements in 24 CFR § 983.203(c) that the HAP Contract provide "the location of each contract unit" and "the area of each contract unit" are waived. Instead, the HAP Contract must specify the number and type of units in the property that are designated as RAD units, including any excepted units. From the time of the initial execution of the PBV RAD HAP Contract, the property must maintain the same number and type of UFAS accessible units. Floating units are subject to all of the requirements in this Notice and the PBV regulations, including physical inspections, rent adjustments, and income-mixing requirements. The alternative requirements with respect to floating units do not apply to non-RAD PBV units.

## C. PBV Resident Rights and Participation.

1. No Rescreening of Tenants upon Conversion. Pursuant to the RAD Statute, at conversion, current households cannot be excluded from occupancy at the Covered Project based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. The Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified in this Notice (e.g., rent phase-in provisions). For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, Section 8(o)(4) of the 1937 Act and 24 CFR § 982.201, concerning eligibility and targeting of

<sup>&</sup>lt;sup>36</sup> These protections (as well as all protections in this Notice for current households) also apply when a household is relocated to facilitate new construction or repairs following conversion and subsequently returns to the Covered Project.

tenants for initial occupancy, will not apply for current households. Once the grandfathered household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement. Further, so as to facilitate the right to return to the assisted property, HUD waives Section 8(o)(4) and 24 CFR § 982.201 to the extent necessary for this provision to apply to current public housing residents of the Converting Project that will reside in non-RAD PBV units or non-RAD PBRA units placed in a project that contain RAD PBV units or RAD PBRA units. Such families and such contract units will otherwise be subject to all requirements of the applicable program, specifically 24 CFR Part 983 for non-RAD PBV units and the PBRA requirements governing the applicable contract for non-RAD PBRA units.

- **2. Right to Return.** See Section 1.4.A.5.b. and the RAD Fair Housing, Civil Rights, and Relocation Notice regarding a resident's right to return. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.
- 3. Phase-in of Tenant Rent Increases. If, purely as a result of conversion, the amount a tenant would pay for rent and utilities under the PBV program (the tenant's TTP) would increase the tenant's TTP by more than the greater of 10 percent or \$25, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase-in period at three years, five years or a combination depending on circumstances and must communicate such policy in writing to affected residents. For example, a PHA may create a policy that uses a three year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section "Calculated PBV TTP" refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1 (the first recertification following conversion), as illustrated below.

Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion 33% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and all subsequent recertifications Full Calculated PBV TTP <sup>37</sup>

#### Five Year Phase in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion 20% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP
- Year 2: Year 2 AR and any IR prior to Year 3 AR 25% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR 33% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 5 AR and all subsequent recertifications Full Calculated PBV TTP

Please Note: In either the three year phase-in or the five-year phase-in, once the Calculated PBV TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward. MTW agencies must also implement a three or five-year phase-in for impacted residents, but may alter the terms above as long as it establishes a written policy setting forth the alternative terms. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

4. Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs. Public Housing residents that are currently FSS participants will continue to participate in the PHA's FSS program.

<sup>&</sup>lt;sup>37</sup> For example, where a resident's most recently paid TTP is \$100, but the Calculated PBV TTP is \$200 and remains \$200 for the period of the resident's occupancy, (i.e. no changes in income) the resident would continue to pay the same rent and utilities for which it was responsible prior to conversion. At the first recertification following conversion, the resident's contribution would increase by 33% of \$100 to \$133. At the second AR, the resdient's contribution would increase by 50% of the \$66 differential to the standard TPP, increasing to \$166. At the third AR, the resident's contribution would increase to \$200 and the resident would continue to pay the Calculated PBV TTP for the duration of their tenancy.

The PHA may continue to use any FSS funds already awarded to serve those FSS participants who live in units converted by RAD. At the completion of the FSS grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. If the PHA continues to run an FSS program that serves PH and/or HCV participants, the PHA will continue to be eligible (subject to NOFA requirements) to apply for FSS funding. Due to the program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the subsequent Appropriation Acts), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD.

However, PHAs should note that until provisions of the Economic Growth, Regulatory Relief, and Consumer Protection Act are implemented, there are certain FSS requirements (e.g., escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR part 984 (current, or as amended), the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 FR 78100.<sup>38</sup> Further, upon conversion to PBV, if the PHA no longer has a public housing program, funds already escrowed for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.<sup>39</sup>

For information on FSS PIC reporting requirements for RAD conversions, see Notice PIH 2016-08 at <a href="http://portal.hud.gov/hudportal/documents/huddoc?id=pih2016-08.pdf">http://portal.hud.gov/hudportal/documents/huddoc?id=pih2016-08.pdf</a>.

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future ROSS-SC grants, nor will its residents be eligible to be served by future ROSS-SC grants,

<sup>&</sup>lt;sup>38</sup> The funding streams for the PH FSS Program and the HCV FSS Program were first merged pursuant to the FY 2014 appropriations act. As a result, PHAs can serve both PH residents and HCV participants, including PBV participants, with FSS funding awarded under the FY 2014 FSS Notice of Funding Availability (FSS NOFA) and any other NOFA under which the combination of funds remains in the applicable appropriations act. For PHAs that had managed both programs separately and now have a merged program, a conversion to PBV should not impact their FSS participants.

<sup>&</sup>lt;sup>39</sup> Where the PHA maintains a public housing program, any forfeited funds that had been escrowed prior to conversion would revert to the PHA's Operating Reserves.

which, by statute, can only serve public housing residents. At the completion of the ROSS-SC grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. Please note that ROSS-SC grantees may be a non-profit or local Resident Association and this consequence of a RAD conversion may impact those entities. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

- **5. Resident Participation and Funding.** In accordance with Attachment 1B, residents of Covered Projects with assistance converted to PBV will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.
- **6. Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the required tenancy addendum (HUD Form 52530-c), as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.
  - a. Termination Notification. HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD and to non-RAD PBV units located at the Covered Project. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter), the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall be:
    - i. A reasonable period of time, but not to exceed 30 days:
      - 1. If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
      - 2. In the event of any drug-related or violent criminal activity or any felony conviction;
    - ii. Not less than 14 days in the case of nonpayment of rent; and
    - iii. Not less than 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

b. **Grievance Process.** Pursuant to requirements in the RAD Statute, HUD is establishing additional resident procedural rights to comply with section 6 of the Act.

For the termination of assistance and several other PHA determinations, PBV program rules require the PHA to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:

- i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(v),<sup>40</sup> an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
  - 1. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(v), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
  - 2. For any additional hearings required under RAD, the Project Owner will perform the hearing.
- ii. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or Contract Administrator.
- iii. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- iv. The Project Owner provides opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

<sup>&</sup>lt;sup>40</sup> § 982.555(a)(1)(iv) is not relevant to RAD as the tenant-based certificate program has been repealed.

To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

7. Earned Income Disregard (EID). Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in 24 CFR § 5.617(b) limiting EID to disabled persons is waived. The waiver, and resulting alternative requirement, apply only to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants that move into the property following conversion or tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion due to loss of employment) is covered by this waiver. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

**8. Jobs Plus.** Jobs Plus grantees awarded FY14 and future funds that convert the Jobs Plus target projects(s) under RAD will be able to finish out their Jobs Plus period of performance unless significant relocation and/or change in building occupancy is planned. If either is planned at the Jobs Plus target project(s), HUD may allow for a modification of the Jobs Plus work plan or may, at the Secretary's discretion, choose to end the Jobs Plus program at that project. If the program is continued, the Project Owner must agree to continue to implement the program according to HUD's program requirements. Jobs Plus target public housing projects must enroll public housing residents into the Jobs Plus rent incentive, JPEID, prior to conversion. Any resident of the Covered Project that had not enrolled prior to conversion is not eligible to enroll in JPEID but may utilize Jobs Plus services that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the Covered Project may voluntarily utilize Jobs Plus services that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion.

9. When Total Tenant Payment Exceeds Gross Rent. Under normal PBV rules, the PHA may select an occupied unit to be included under the PBV HAP Contract only if the unit's occupants are eligible for housing assistance payments (24 CFR § 983.53(c)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent) (24 CFR § 983.258). Since the rent limitation under this Section of the Notice may result in a family's TTP equaling or exceeding the gross rent for the unit, for residents living in the Converting Project prior to conversion and who will return to the Covered Project after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. During any period when the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice. 41 In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP Contract. The PHA is required to process these individuals through the Form 50058 submodule in PIC. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

Unless a waiver is requested and approved as described below, any new admission to the Covered Project must meet the eligibility requirements at 982.201 and require a subsidy payment at admission to the program, which means their TTP may not equal or exceed the gross rent for the unit at that time. Further, a PHA must remove a unit from the contract when no assistance has been paid for 180 days. If units are removed from the HAP contract because a new admission's TTP comes to equal or exceed the gross rent for the unit and if the project is fully assisted, HUD is imposing an

<sup>&</sup>lt;sup>41</sup> For example, a public housing family residing in a property converting under RAD has a TTP of \$600. The property has an initial Contract Rent of \$500, with a \$50 Utility Allowance. Following conversion, the residents is still responsible for paying \$600 in tenant rent and utilities.

alternative requirement that the PHA must reinstate the unit after the family has left the property. If the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR §983.207 or, where "floating units have been permitted, Section 1.6.B.10 of the Notice."

A PHA may request a waiver from HUD for the Covered Project in order to admit otherwise eligible families whose TTP exceeds gross rent and to allow the units those families occupy to remain under the HAP contract even if the PHA has not made a housing assistance payment for a family in 180 days.

For a Covered Project that consists of 100 percent RAD PBV units, the PHA must demonstrate that a waiver is necessary in order to avoid an undue concentration of poverty at the Covered Project. A PHA may evidence this by providing data showing, for example:

- how eligible income-certified applicants on the waiting list must be passed over because their incomes result in zero HAP at admission causing a higher concentration of poverty at the covered project; or
- how the income of newly admitted families is causing a markedly higher concentration of poverty than the PHA's non-RAD PBV projects.

The resulting impact on the property must be compared with the concentration of poverty at non-RAD PBV projects in the PHA's jurisdiction. If there are no non-RAD PBV projects in the PHA's jurisdiction, the PHA may alternatively demonstrate that the median income of families that could be admitted to the Covered Project is significantly lower than the median income of new admissions from the waiting list to the PHA's HCV program since the time of the RAD conversion.

For any other Covered Project, the PHA must demonstrate that the property contains specific units (e.g., units suitable for large families or accessible units) for which there are insufficient alternative housing opportunities.

If the waiver is approved, the new admission[s] families covered under the waiver are participants under the program and all of the family obligations and protections under RAD and PBV apply to the family, and the unit is subject to all program requirements. Such waiver requests should be submitted to the PIH Field Office in accordance with Notice PIH 2018-16.

**10. Under-Occupied Unit.** If a family is in an under-occupied unit under 24 CFR § 983.260 at the time of conversion, the family may remain in this unit until an appropriate-sized unit becomes available in the Covered Project. When an appropriate

sized unit becomes available in the Covered Project, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, 24 CFR § 983.260 is waived for current residents remaining or returning to the Covered Project. MTW agencies may not modify this requirement. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

## D. PBV: Other Miscellaneous Provisions

- 1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration. PHAs and the Project Owner must cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.
- 2. Ongoing PHA Board Review of Operating Budget. The Owner must submit to the administering PHA's Board the operating budget for the Covered Project annually. The PHA's Board must confirm that the Project Owner is making deposits into the Reserve for Replacement account in accordance with the RCC as well as assess the financial health of the Covered Project.<sup>42</sup>
- 3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3). These sections have been moved to 1.4.A.13 and 1.4.A.14.
- 4. Establishment of Waiting List. 24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program-wide, or site-based waiting list from which residents for the Covered Project will be admitted. These provisions shall apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:
  - a. Transferring an existing site-based waiting list to a new site-based waiting list.

<sup>&</sup>lt;sup>42</sup> For PBV conversions that are not FHA-insured, a future HUD notice will describe project financial data that may be required to be submitted by a PBV owner for purposes of monitoring and evaluation, given that PBV projects do not submit annual financial statements to HUD/REAC.

- b. Transferring an existing site-based waiting list to a PBV program-wide or HCV program-wide waiting list.
- c. Transferring an existing community-wide public housing waiting list to a PBV program-wide or HCV program-wide waiting list, an option particularly relevant for PHAs converting their entire portfolio under RAD.
- d. Informing applicants on a community-wide public housing waiting list how to transfer their application to one or more newly created site-based waiting lists.

For any applicants on the public housing waiting list that are likely to be ineligible for admission to a Covered Project converting to PBV because the household's TTP is likely to exceed the RAD gross rent, the PHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the PHA's remaining public housing waiting list(s) or to another voucher waiting list, in addition to transferring such household to the waiting list for the Covered Project.

To the extent any wait list relies on the date and time of application, the applicants shall have priority on the wait list(s) to which their application was transferred in accordance with the date and time of their application to the original waiting list.

If the PHA is transferring assistance to another neighborhood and, as a result of the transfer of the waiting list, the applicant would only be eligible for a unit in a location which is materially different from the location to which the applicant applied, the PHA must notify applicants on the waiting list of the transfer of assistance, and on how they can apply for residency at other sites.

If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the Covered Project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community-wide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other

outreach as appropriate. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).<sup>43</sup>

When using a site-based waiting list, PHAs should consider waiting list and transfer policies that expand opportunities for tenants seeking an emergency transfer under, or consistent with, the PHA's Emergency Transfer Plan. This includes allowing for easier moves between assisted properties.

To implement this provision, HUD is specifying alternative requirements for 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the Covered Project in accordance with 24 CFR § 983.251(c). To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

A PHA must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations.

- **5. Mandatory Insurance Coverage.** The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.
- **6. Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with long-term preservation of the Covered Project. With respect to any financing contemplated at the time of conversion (including any permanent financing which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC but HUD review of liens must be performed prior to execution.
- 7. Administrative Fees for Public Housing Conversions During the Year of Conversion. For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the "year of conversion"), RAD PBV projects will be funded

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<sup>&</sup>lt;sup>43</sup> For more information on serving persons with LEP, please see HUD's Final guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732), published on January 22, 2007.

with public housing funds. For example, if the project's assistance converts effective July 1, 2015, the public housing ACC between the PHA and HUD will be amended to reflect the number of units under HAP Contract, but will be for zero dollars, and the RAD PBV HAP Contract will be funded with public housing money for July through December 2015. Since TBRA is not the source of funds, PHAs should not report leasing and expenses into VMS during this period, and PHAs will not receive section 8 administrative fee funding for converted units during this time.

PHAs operating an HCV program typically receive administrative fees for units under a HAP Contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Work Responsibility Act of 1998" and 24 CFR § 982.152(b). During the year of conversion mentioned in the preceding paragraph, these provisions are waived. PHAs will not receive Section 8 administrative fees for PBV RAD units during the year of conversion.

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

**8.** Choice-Mobility. One of the key features of the PBV program is the mobility component, which provides that if the family has elected to terminate the assisted lease at any time after the first year of occupancy in accordance with program requirements, the PHA must offer the family the opportunity for continued tenant-based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance.

If as a result of participation in RAD a significant percentage of the PHA's HCV program becomes PBV assistance, it is possible for most or all of a PHA's turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility. While HUD is committed to ensuring mobility remains a cornerstone of RAD policy, HUD recognizes that it remains important for the PHA to still be able to use tenant-based vouchers to address the specific housing needs and priorities of the community. Therefore, HUD is establishing the following alternative requirement for PHAs where, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP Contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD: The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventory

turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received. In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA's administrative plan.

To effectuate this provision, HUD is providing an alternative requirement to Section 8(o)(13)(E) of the Act and 24 CFR § 983.261(c). Please note that this alternative requirement does not apply to PBVs entered into outside of the context of RAD . MTW agencies may not alter this requirement.

- 9. Reserve for Replacement. The Project Owner shall establish and maintain a replacement reserve in an interest-bearing account to aid in funding extraordinary maintenance and repair and replacement of capital items in accordance with applicable regulations. The reserve must be built up to and maintained at a level determined by HUD to be sufficient to meet projected requirements. For FHA transactions, Replacement Reserves shall be maintained in accordance with the FHA Regulatory Agreement. For all other transactions, Replacement Reserves shall be maintained in a bank account or similar instrument, as approved by HUD, where funds will be held by the Project Owner or mortgagee and may be drawn from the reserve account and used subject to HUD guidelines.
- 10. Initial Certifications and Tenant Rent Calculations. The Contract Administrator uses the family's public housing tenant rent (reflected on line 10f of the family's most recent HUD Form 50058) at the date of the conversion to calculate the PBV HAP and tenant rent until the effective date of the earlier of the family's first regular or interim recertification following the date of conversion. At the earlier of the family's first regular or interim recertification, the Contract Administrator will use the family's TTP based on the recertification and the HCV utility allowance (or the PBV sitespecific utility allowance, if applicable) to determine the PBV HAP and tenant rent. This means that the family pays the same tenant rent as the family was paying under the public housing program until the earlier of first regular or interim reexamination following conversion, at which point the normally applicable PBV calculation for the tenant rent becomes effective. (Under the PBV program, the monthly HAP is the rent to owner minus the tenant rent, and the tenant rent is the family TTP minus the utility allowance.) To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same property as the Covered Project shall be subject to the terms of this provision. To effectuate this provision, HUD is waiving 24 CFR 5.601 and 983.3(c)(6)(iii).

# **Attachment E**

# § 970.21 Relocation of residents.

- (a) *Relocation of residents on a nondiscriminatory basis and relocation resources.* A PHA must offer each family displaced by demolition or disposition comparable housing that meets housing quality standards (HQS) and is located in an area that is generally not less desirable than the location of the displaced persons. The housing must be offered on a nondiscriminatory basis, without regard to race, color, religion, creed, national origin, handicap, age, familial status, or gender, in compliance with applicable Federal and state laws. For persons with disabilities displaced from a unit with reasonable accommodations, comparable housing should include similar accommodations. Such housing may include:
  - (1) Tenant-based assistance, such as assistance under the Housing Choice Voucher Program, <u>24 CFR part 982</u>, except that such assistance will not be considered "comparable housing" until the family is actually relocated into such housing;
  - (2) Project-based assistance; or
  - (3) Occupancy in a unit operated or assisted by the PHA at a rental rate paid by the family that is comparable to the rental rate applicable to the unit from which the family is vacated.
- (b) *In-place tenants*. A PHA may not complete disposition of a building until all tenants residing in the building are relocated.

## (c) Financial resources.

- (1) Sources of funding for relocation costs related to demolition or disposition may include, but are not limited to, capital funds or other federal funds currently available for this purpose;
- (2) If Federal financial assistance under the Community Development Block Grant (CDBG) program, 42 U.S.C. 5301 et seq. (including loan guarantees under section 108 of the Housing and Community Development Act of 1974, 42 U.S.C. 5308 et seq.); the Urban Development Action Grant (UDAG) program, 42 U.S.C. 5318 et seq.; or HOME program, 42 U.S.C. 12701 et seq. is used in connection with the demolition or disposition of public housing, the project is subject to section 104(d) of the Housing and Community Development Act of 1974, 42 U.S.C. 5304(d) (as amended)), including the relocation payment provisions and the anti-displacement provisions, which require that comparable replacement dwellings be provided within the community for the same number of occupants as could have been housed in the occupied and vacant, occupiable low- and moderate-income units demolished or converted to another use.
- (d) *Relocation timetable*. For the purpose of determining operating subsidy eligibility under <u>24</u> <u>CFR part 990</u>, a PHA must provide the following information in the application or immediately following application submission:
  - (1) The number of occupied units at the time of demolition/disposition application approval;

- (2) A schedule for the relocation of those residents on a month-by-month basis.
- (e) The PHA is responsible for the following:
  - (1) Notifying each family residing in the development of the proposed demolition or disposition 90 days prior to the displacement date, except in cases of imminent threat to health and safety. The notification must include a statement that:
    - (i) The development or portion of the development will be demolished or disposed of;
    - (ii) The demolition of the building in which the family resides will not commence until each resident of the building has been relocated;
    - (iii) Each family displaced by such action will be provided comparable housing, which may include housing with reasonable accommodations for disability, if required under section 504 of the Rehabilitation Act of 1973 and HUD's regulations in 24 CFR part 8, as described in paragraph (a) of this section;
  - (2) Providing for the payment of the actual and reasonable relocation expenses of each resident to be displaced, including residents requiring reasonable accommodations because of disabilities;
  - (3) Ensuring that each displaced resident is offered comparable replacement housing as described in paragraph (b) of this section; and
  - (4) Providing any necessary counseling for residents that are displaced.
- (f) In addition, the PHA's plan for the relocation of residents who would be displaced by the proposed demolition or disposition must indicate:
  - (1) The number of individual residents to be displaced;
  - (2) The type of counseling and advisory services the PHA plans to provide;
  - (3) What housing resources are expected to be available to provide housing for displaced residents; and
  - (4) An estimate of the costs for counseling and advisory services and resident moving expenses, and the expected source for payment of these costs.
- (g) The Uniform Relocation Act does not apply to demolitions and dispositions under this part.

# Capital Fund Program - Five-Year Action Plan

Status: Draft Approval Date: Approved By: 02/28/2022

| Part I: Summary |  |  |                                   |                                   |                                   |                                   |  |
|-----------------|--|--|-----------------------------------|-----------------------------------|-----------------------------------|-----------------------------------|--|
|                 | Name: Madison Community Development Authority  Number: WI003 | Locality (City/County & State)  X Original 5-Year Plan |                                   | Revised 5-Year Plan (Revision No: |                                   | )                                 |  |
| Α.              | Development Number and Name                                  | Work Statement for<br>Year 1 2024                      | Work Statement for<br>Year 2 2025 | Work Statement for<br>Year 3 2026 | Work Statement for<br>Year 4 2027 | Work Statement for<br>Year 5 2028 |  |
|                 | BJARNES ROMNES APARTMENTS (WI003000300)                      | \$644,029.09   | \$710,459.84                      | \$930,680.32                      | \$644,029.09                      | \$644,029.09                      |  |
|                 | BRITTINGHAM APARTMENTS (WI003000400)                         | \$481,873.94   | \$451,245.94                      | \$416,297.09                      | \$385,235.94                      | \$481,873.94                      |  |
|                 | TRUAX PARK APARTMENTS LLC (WI003000500)                      | \$176,326.79   | \$317,120.29                      | \$165,416.23                      | \$226,326.79                      | \$176,326.79                      |  |
|                 | SCATTERED SITE (WI003000200)                                 | \$669,050.81   | \$451,411.59                      | \$562,297.02                      | \$665,688.81                      | \$669,050.81                      |  |
|                 | TRUAX PHASE II (WI003000600)                                 | \$140,088.37   | \$181,131.34                      | \$36,678.34                       | \$190,088.37                      | \$140,088.37                      |  |
|                 | AUTHORITY-WIDE   | \$230,092.00   | \$230,092.00                      | \$230,092.00                      | \$230,092.00                      | \$230,092.00                      |  |

Work Statement for Year 1

| Identifier | Development Number/Name   | General Description of Major Work Categories   | Quantity | <b>Estimated Cost</b> |
|------------|---|--|----------|-----------------------|
|            | BJARNES ROMNES APARTMENTS (WI003000300)   |  |          | \$644,029.09          |
| ID0326     | AMP 300 OPERATIONS * 2024(Operations (1406))  | AMP 300 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT   |          | \$173,268.00          |
| ID0333     | AMP 300 MANAGEMENT IMPROVEMENTS * TRAINING * 2024(Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements) | AMP 300 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE<br>NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR<br>REQUIRED MATERIALS AS NEEDED  |          | \$7,644.79            |
| ID0339     | AMP 300 ARCHITECTURAL AND ENGINEERING * 2024(Contract Administration (1480)-Other Fees and Costs)   | AMP 300 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | \$9,254.90            |
| ID0343     | AMP 300 PROGRAMMATIC FLOORING REPLACEMENT * 2024(Dwelling Unit-Interior (1480)-Flooring (non routine))  | AMP 300 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR          |          | \$59,782.79           |
| ID0348     | AMP 300 HEATING EQUIPMENT REPLACEMENT * 2024(Dwelling Unit-Interior (1480)-Mechanical)  | AMP 300 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$59,782.79           |
| ID0353     | AMP 300 ON DEMAND * 2024(Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing)   | AMP 300 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF         |          | \$134,295.82          |

| Part II: Su | pporting Pages - Physical Needs Work Statements (s)  |   |          |                |
|-------------|--|---|----------|----------------|
| Work State  | ement for Year 1 2024  |   |          |                |
| Identifier  | Development Number/Name  | General Description of Major Work Categories  | Quantity | Estimated Cost |
|             |  | ENCOUNTERED * NO FORCE LABOR  |          |                |
| ID0522      | AMP 300 Boiler Replacment Romnes (Non-Dwelling Interior (1480)-Mechanical)   | Replace older boilers ( Parts are harder to find) with new energy efficient boilers.  NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL  REMEDIATE IF ENCOUNTERED * NO FORCE LABOR                                      |          | \$100,000.00   |
| ID0523      | AMP 300 Roof Replacment (Dwelling Unit-Exterior (1480)-Roofs)  | Replace pass life expectancy roof with new 30 year roof. Baird/Fisher units. NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | \$100,000.00   |
|             | BRITTINGHAM APARTMENTS (WI003000400)   |   |          | \$481,873.94   |
| ID0327      | AMP 400 OPERATIONS * 2024(Operations (1406))   | AMP 400 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT  |          | \$131,122.00   |
| ID0334      | AMP 400 MANAGEMENT IMPROVEMENTS * TRAINING * 2024(Management Improvement (1408)-Staff Training, Management Improvement (1408)-System Improvements) | AMP 400 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE<br>NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR<br>REQUIRED MATERIALS AS NEEDED   |          | \$5,765.77     |
| ID0340      | AMP 400 ARCHITECTURAL AND ENGINEERING * 2024(Contract Administration (1480)-Other Fees and Costs)  | AMP 400 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$6,964.71     |

Work Statement for Year 1

| Identifier | Development Number/Name  | General Description of Major Work Categories  | Quantity | <b>Estimated Cost</b> |
|------------|--|---|----------|-----------------------|
| ID0344     | AMP 400 PROGRAMMATIC FLOORING REPACEMENT * 2024(Dwelling Unit-Interior (1480)-Flooring (non routine))  | AMP 400 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-<br>ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS *<br>INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL<br>MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED<br>BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR<br>PROGRAMMATIC FLOORING REPLACEMENT ON AN AS-VACATED<br>BASIS |          | \$39,978.64           |
| ID0354     | AMP 400 ON DEMAND * 2024(Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing)  | AMP 400 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR   |          | \$198,042.82          |
| ID0524     | AMP 400 HEATING EQUIPMENT REPLACEMENT (Dwelling Unit-Interior (1480)- Mechanical, Dwelling Unit-Interior (1480)-Plumbing, Non-Dwelling Construction - Mechanical (1480)-Central Boiler, Non-Dwelling Construction - Mechanical (1480)-Central Chiller, Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems, Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System, Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters, Non-Dwelling Interior (1480)-Plumbing) Mechanical, Non-Dwelling Interior (1480)-Plumbing) | AMP 400 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | \$100,000.00          |
|            | TRUAX PARK APARTMENTS LLC (WI003000500)  |   |          | \$176,326.79          |
| ID0328     | AMP 500 OPERATIONS * 2024(Operations (1406))   | AMP 500 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT  |          | \$42,146.00           |
| ID0335     | AMP 500 MANAGEMENT IMPROVEMENTS * TRAINING * 2024(Management Improvement (1408)-System Improvements, Management Improvement (1408)-Staff Training)   | AMP 500 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE<br>NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR<br>REQUIRED MATERIALS AS NEEDED   |          | \$1,235.52            |

Work Statement for Year 1

|            | T   |   |          | 1                     |
|------------|---|---|----------|-----------------------|
| Identifier | Development Number/Name   | General Description of Major Work Categories  | Quantity | <b>Estimated Cost</b> |
| ID0341     | AMP 500 ARCHITECTURAL AND ENGINEERING * 2024(Contract Administration (1480)-Other Fees and Costs)         | AMP 500 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR   |          | \$1,474.51            |
| ID0345     | AMP 500 PROGRAMMATIC FLOORING REPLACEMENT * 2024(Dwelling Unit-Interior (1480)-Flooring (non routine))    | AMP 500 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-<br>ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS *<br>INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL<br>MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED<br>BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR                  |          | \$9,680.97            |
| ID0349     | AMP 500 HEATING EQUIPMENT REPLACEMENT * 2024(Dwelling Unit-Interior (1480)-Mechanical)                    | AMP 500 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR                      |          | \$27,249.47           |
| ID0355     | AMP 500 ON DEMAND * 2024(Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing) | AMP 500 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$94,540.32           |
|            | SCATTERED SITE (WI003000200)  |   |          | \$669,050.81          |
| ID0329     | AMP 200 OPERATIONS * 2024(Operations (1406))  | AMP 200 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT  |          | \$98,341.00           |

Work Statement for Year 1

| Identifier | Development Number/Name  | General Description of Major Work Categories  | Quantity | <b>Estimated Cost</b> |
|------------|--|---|----------|-----------------------|
| ID0331     | AMP 200 PROGRAMMATIC FLOORING REPACEMENT * 2023(Dwelling Unit-Interior (1480)-Flooring (non routine))  | AMP 200 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR                               |          | \$47,835.89           |
| ID0332     | AMP 200 MANAGEMENT IMPROVEMENTS * TRAINING * 2024(Management Improvement (1408)-Staff Training, Management Improvement (1408)-System Improvements) | AMP 200 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE<br>NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR<br>REQUIRED MATERIALS AS NEEDED   |          | \$4,298.58            |
| ID0338     | AMP 200 ARCHITECTURAL AND ENGINEERING * 2024(Contract Administration (1480)-Other Fees and Costs)  | AMP 200 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR   |          | \$5,050.98            |
| ID0347     | AMP 200 HEATING EQUIPMENT REPLACEMENT * 2024(Dwelling Unit-Interior (1480)-Mechanical)   | AMP 200 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR                      |          | \$178,550.04          |
| ID0352     | AMP 200 ON DEMAND * 2024(Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing)  | AMP 200 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$134,974.32          |
| ID0520     | AMP 200 A Site Window Replacment(Dwelling Unit-Exterior (1480)-Windows)  | Replace old none efficient windows with double hung energy efficient windows. NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR   |          | \$100,000.00          |

Work Statement for Year 1

| Identifier | Development Number/Name   | General Description of Major Work Categories   | Quantity | <b>Estimated Cost</b> |
|------------|---|--|----------|-----------------------|
| ID0521     | AMP 200 B Site Window Replacement(Dwelling Unit-Exterior (1480)-Windows)  | Replace old non-efficient windows with energy efficient double hung windows.  NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL  REMEDIATE IF ENCOUNTERED * NO FORCE LABOR   |          | \$100,000.00          |
|            | TRUAX PHASE II (WI003000600)  |  |          | \$140,088.37          |
| ID0330     | AMP 600 OPERATIONS * 2024(Operations (1406))  | AMP 600 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT   |          | \$23,415.00           |
| ID0336     | AMP 600 MANAGEMENT IMPROVEMENTS * TRAINING * 2024(Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements) | AMP 600 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE<br>NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR<br>REQUIRED MATERIALS AS NEEDED  |          | \$1,055.34            |
| ID0342     | AMP 600 ARCHITECTURAL AND ENGINEERING * 2024(Contract Administration (1480)-Other Fees and Costs)   | AMP 600 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | \$1,254.90            |
| ID0346     | AMP 600 PROGRAMMATIC FLOORING REPACEMENT * 2024(Dwelling Unit-Interior (1480)-Flooring (non routine))   | AMP 600 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR          |          | \$4,124.53            |
| ID0351     | AMP 600 HEATING EQUIPMENT REPLACEMENT * 2024(Dwelling Unit-Interior (1480)-Mechanical)  | AMP 600 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$21,693.03           |

| Part II: Su | pporting Pages - Physical Needs Work Statements (s)   |   |          |                |
|-------------|---|---|----------|----------------|
| Work State  | ement for Year 1 2024   |   |          |                |
| Identifier  | Development Number/Name   | General Description of Major Work Categories  | Quantity | Estimated Cost |
|             |   |   |          |                |
| ID0356      | AMP 600 ON DEMAND * 2024(Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing) | AMP 600 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$88,545.57    |
|             | AUTHORITY-WIDE (NAWASD)   |   |          | \$230,092.00   |
| ID0337      | CAPITAL FUND PROGRAM FEE * 2024(Administration (1410)-Salaries,Administration (1410)-Sundry)              | CAPITAL FUND PROGRAM FEE * PROVIDE ADMINISTRATION OF CAPITAL FUND GRANT FUNDS AND PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | \$230,092.00   |
|             | Subtotal of Estimated Cost  |   |          | \$2,341,461.00 |

Work Statement for Year 2

| Identifier | Development Number/Name  | General Description of Major Work Categories  | Quantity | <b>Estimated Cost</b> |
|------------|--|---|----------|-----------------------|
|            | BJARNES ROMNES APARTMENTS (WI003000300)  |   |          | \$710,459.84          |
| ID0375     | AMP 300 OPERATIONS * 2025(Operations (1406))   | AMP 300 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT  |          | \$132,796.00          |
| ID0382     | AMP 300 MANAGEMENT IMPROVEMENTS * TRAINING (Management Improvement (1408)-Staff Training, Management Improvement (1408)-System Improvements) | AMP 300 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE<br>NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR<br>REQUIRED MATERIALS AS NEEDED   |          | \$7,644.79            |
| ID0388     | AMP 300 ARCHITECTURAL AND ENGINEERING (Contract Administration (1480)-Other Fees and Costs)  | AMP 300 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR   |          | \$9,254.90            |
| ID0392     | AMP 300 PROGRAMMATIC FLOORING REPLACEMENT (Dwelling Unit-Interior (1480)-Flooring (non routine))   | AMP 300 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR                               |          | \$59,782.79           |
| ID0397     | AMP 300 ON DEMAND (Dwelling Unit-Interior (1480)-Mechanical, Dwelling Unit-Interior (1480)-Plumbing)   | AMP 300 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$334,295.82          |
| ID0402     | AMP 300 HEATING EQUIPMENT REPLACEMENT (Dwelling Unit-Interior (1480)-Mechanical)   | AMP 300 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE                            |          | \$166,685.54          |

| Part II: Su | pporting Pages - Physical Needs Work Statements (s)  |   |          |                |
|-------------|--|---|----------|----------------|
| Work State  | ement for Year 2 2025  |   |          |                |
| Identifier  | Development Number/Name  | General Description of Major Work Categories  | Quantity | Estimated Cost |
|             | I  | LABOR   |          |                |
|             | BRITTINGHAM APARTMENTS (WI003000400)   |   |          | \$451,245.94   |
| ID0376      | AMP 400 OPERATIONS (Operations (1406))   | AMP 400 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT  |          | \$100,494.00   |
| ID0383      | AMP 400 MANAGEMENT IMPROVEMENTS * TRAINING (Management Improvement (1408)-Staff Training, Management Improvement (1408)-System Improvements) | AMP 400 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE<br>NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR<br>REQUIRED MATERIALS AS NEEDED   |          | \$5,765.77     |
| ID0389      | AMP 400 ARCHITECTURAL AND ENGINEERING (Contract Administration (1480)-Other Fees and Costs)  | AMP 400 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR   |          | \$6,964.71     |
| ID0393      | AMP 400 PROGRAMMATIC FLOORING REPACEMENT (Dwelling Unit-Interior (1480)-Flooring (non routine))  | AMP 400 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-<br>ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS *<br>INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL<br>MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED<br>BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR<br>PROGRAMMATIC FLOORING REPLACEMENT ON AN AS-VACATED<br>BASIS |          | \$39,978.64    |
| ID0398      | AMP 400 ON DEMAND (Dwelling Unit-Interior (1480)-Mechanical, Dwelling Unit-Interior (1480)-Plumbing)   | AMP 400 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF  |          | \$298,042.82   |

| Part II: Suj | oporting Pages - Physical Needs Work Statements (s)  |   |          |   |
|--------------|--|---|----------|---|
| Work State   | ment for Year 2 2025   |   |          |   |
| Identifier   | Development Number/Name  | General Description of Major Work Categories  | Quantity | Estimated Cost                          |
|              |  | ENCOUNTERED * NO FORCE LABOR  |          | <u> </u>                                |
|              |  |   |          |   |
|              | TRUAX PARK APARTMENTS LLC (WI003000500)  |   |          | \$317,120.29                            |
| ID0377       | AMP 500 OPERATIONS(Operations (1406))  | AMP 500 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT  |          | \$32,302.00                             |
|              |  |   |          | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, |
| ID0384       | AMP 500 MANAGEMENT IMPROVEMENTS * TRAINING (Management Improvement (1408)-Staff Training, Management Improvement (1408)-System Improvements) | AMP 500 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE<br>NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR<br>REQUIRED MATERIALS AS NEEDED   |          | \$1,235.52                              |
|              |  | REQUIRED WATERIALS AS NEEDED  |          |   |
| ID0390       | AMP 500 ARCHITECTURAL AND ENGINEERING (Contract Administration (1480)-Other Fees and Costs)  | AMP 500 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR   |          | \$1,474.51                              |
| ID0394       | AMP 500 PROGRAMMATIC FLOORING REPLACEMENT (Dwelling Unit-Interior (1480)-Flooring (non routine))   | AMP 500 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-<br>ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS *<br>INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL<br>MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED<br>BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR                  |          | \$9,680.97                              |
| ID0399       | AMP 500 ON DEMAND (Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing)  | AMP 500 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$244,540.32                            |

| Part II: Su | pporting Pages - Physical Needs Work Statements (s)  |  |          |                |
|-------------|--|--|----------|----------------|
| Work State  | ement for Year 2 2025  |  |          |                |
| Identifier  | Development Number/Name  | General Description of Major Work Categories   | Quantity | Estimated Cost |
|             |  |  |          |                |
| ID0403      | AMP 500 HEATING EQUIPMENT REPLACEMENT (Dwelling Unit-Interior (1480)-Mechanical)   | AMP 500 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$27,886.97    |
|             | SCATTERED SITE (WI003000200)   |  |          | \$451,411.59   |
| ID0378      | AMP 200 OPERATIONS(Operations (1406))  | AMP 200 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT   |          | \$75,370.00    |
| ID0380      | AMP 200 PROGRAMMATIC FLOORING REPACEMENT (Dwelling Unit-Interior (1480)-Flooring (non routine))  | AMP 200 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR          |          | \$47,835.89    |
| ID0381      | AMP 200 MANAGEMENT IMPROVEMENTS * TRAINING * (Management Improvement (1408)-Staff Training, Management Improvement (1408)-System Improvements) | AMP 200 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR REQUIRED MATERIALS AS NEEDED  |          | \$4,298.58     |
| ID0387      | AMP 200 ARCHITECTURAL AND ENGINEERING (Contract Administration (1480)-Other Fees and Costs)  | AMP 200 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | \$5,050.98     |

| Part II: Sup | oporting Pages - Physical Needs Work Statements (s)  |   |          |                |
|--------------|--|---|----------|----------------|
| Work State   | ment for Year 2 2025   |   |          |                |
| Identifier   | Development Number/Name  | General Description of Major Work Categories  | Quantity | Estimated Cost |
|              |  |   |          |                |
| ID0396       | AMP 200 ON DEMAND (Dwelling Unit-Interior (1480)-Mechanical, Dwelling Unit-Interior (1480)-Plumbing)   | AMP 200 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$234,974.32   |
| ID0401       | AMP 200 HEATING EQUIPMENT REPLACEMENT (Dwelling Unit-Interior (1480)-Mechanical)   | AMP 200 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR                      |          | \$83,881.82    |
|              | TRUAX PHASE II (WI003000600)   |   |          | \$181,131.34   |
| ID0379       | AMP 600 OPERATIONS (Operations (1406))   | AMP 600 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT  |          | \$17,945.00    |
| ID0385       | AMP 600 MANAGEMENT IMPROVEMENTS * TRAINING (Management Improvement (1408)-System Improvements, Management Improvement (1408)-Staff Training) | AMP 600 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE<br>NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR<br>REQUIRED MATERIALS AS NEEDED   |          | \$1,055.34     |

Work Statement for Year 2

|            |  | ı   |          | <del> </del>          |
|------------|--|---|----------|-----------------------|
| Identifier | Development Number/Name  | General Description of Major Work Categories  | Quantity | <b>Estimated Cost</b> |
| ID0391     | AMP 600 ARCHITECTURAL AND ENGINEERING(Contract Administration (1480)-Other Fees and Costs)           | AMP 600 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR   |          | \$1,254.90            |
| ID0395     | AMP 600 HEATING EQUIPMENT REPLACEMENT (Dwelling Unit-Interior (1480)-Mechanical)                     | AMP 600 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR                      |          | \$22,330.53           |
| ID0400     | AMP 600 ON DEMAND (Dwelling Unit-Interior (1480)-Mechanical, Dwelling Unit-Interior (1480)-Plumbing) | AMP 600 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$138,545.57          |
|            | AUTHORITY-WIDE (NAWASD)  |   |          | \$230,092.00          |
| ID0386     | CAPITAL FUND PROGRAM FEE * (Administration (1410)-Salaries, Administration (1410)-Sundry)            | CAPITAL FUND PROGRAM FEE * PROVIDE ADMINISTRATION OF CAPITAL FUND GRANT FUNDS AND PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | \$230,092.00          |
|            | Subtotal of Estimated Cost   |   |          | \$2,341,461.00        |

Work Statement for Year 3

| Identifier | Development Number/Name  | General Description of Major Work Categories  | Quantity | Estimated Cost |
|------------|--|---|----------|----------------|
|            | BJARNES ROMNES APARTMENTS (WI003000300)  |   |          | \$930,680.32   |
| ID0416     | Copy of AMP 300 OPERATIONS * 2022(Operations (1406))   | AMP 300 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT  |          | \$170,268.00   |
| ID0423     | Copy of AMP 300 MANAGEMENT IMPROVEMENTS * TRAINING * 2022(Management Improvement (1408)-Staff Training, Management Improvement (1408)-System Improvements) | AMP 300 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR REQUIRED MATERIALS AS NEEDED   |          | \$7,644.79     |
| ID0430     | Copy of AMP 300 ARCHITECTURAL AND ENGINEERING * 2022(Contract Administration (1480)-Other Fees and Costs)  | AMP 300 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR   |          | \$7,712.42     |
| ID0435     | Copy of AMP 300 ON DEMAND * 2022(Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing)  | AMP 300 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$216,729.23   |
| ID0439     | Copy of AMP 300 EXTERIOR LIGHTING UPGRADES * 2022(Dwelling Unit-Site Work (1480)-Lighting)   | AMP 300 EXTERIOR LIGHTING UPGRADES * REMOVE EXTERIOR - LOW EFFICIENCY BULBS AND FIXTURES, COSTS TO INCLUDE RECYCLING AS NEEDED * INSTALL NEW HIGH EFFICIENCY BULBS AND FIXTURES * NO FORCE LABOR  |          | \$29,162.94    |
| ID0440     | Copy of AMP 300 EXTERIOR LIGHTING UPGRADES * 2022(Dwelling Unit-Site Work (1480)-Lighting)   | AMP 300 EXTERIOR LIGHTING UPGRADES * REMOVE EXTERIOR -<br>LOW EFFICIENCY BULBS AND FIXTURES, COSTS TO INCLUDE<br>RECYCLING AS NEEDED * INSTALL NEW HIGH EFFICIENCY BULBS<br>AND FIXTURES * NO FORCE LABOR   |          | \$29,162.94    |

Work Statement for Year 3

| Identifier | Development Number/Name  | General Description of Major Work Categories   | Quantity | <b>Estimated Cost</b> |
|------------|--|--|----------|-----------------------|
| ID0443     | Copy of AMP 300 NON-DWELLING EQUIPMENT * 2022(Non-Dwelling Equipment-<br>Expendable/Non-Expendable (1480)-Other) | AMP 300 NON-DWELLING EQUIPMENT * PURCHASE STATIONARY POWER TOOLS, PAINT SHAKERS, PAINT STRIPING EQUIPMENT, SEWER CLEANING EQUIPMENT, LASER LEVELS, FLOOR BUFFERS, LARGE FLOOR CLEANING EQUIPMENT, VIDEO SURVEILLANCE EQUIPMENT   |          | \$10,000.00           |
| ID0448     | Copy of AMP 300 HEATING EQUIPMENT REPLACEMENT * 2022(Dwelling Unit-Interior (1480)-Mechanical)                   | AMP 300 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$100,000.00          |
| ID0452     | Copy of AMP 300 PROGRAMMATIC FLOORING REPLACEMENT * 2022(Dwelling Unit-Interior (1480)-Flooring (non routine))   | AMP 300 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR          |          | \$60,000.00           |
| ID0454     | Copy of AMP 300 Camera and equipment upgrade(Non-Dwelling Interior (1480)-Security)                              | Romnes - Upgrade old cameras and associated equipment with new. Also adding new cameras to blind locations in the building.  |          | \$100,000.00          |
| ID0455     | Copy of AMP 300 WINDOW REPLACMENT(Dwelling Unit-Exterior (1480)-Windows)   | Romnes - Replace half the windows/frames with new. Replace with high efficiency windows  |          | \$100,000.00          |
| ID0456     | Copy of AMP 300 SIDING REPLACMENT(Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Siding)    | Romnes - Remove and replace siding and soffits. Replace with new efficient siding and soffit.  |          | \$100,000.00          |
|            | BRITTINGHAM APARTMENTS (WI003000400)   |  |          | \$416,297.09          |

Work Statement for Year 3

| Identifier | Development Number/Name  | General Description of Major Work Categories  | Quantity | <b>Estimated Cost</b> |
|------------|--|---|----------|-----------------------|
| ID0417     | Copy of AMP 400 OPERATIONS * 2022(Operations (1406))   | AMP 400 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT  |          | \$128,851.00          |
| ID0425     | Copy of AMP 400 MANAGEMENT IMPROVEMENTS * TRAINING * 2022(Management Improvement (1408)-Staff Training, Management Improvement (1408)-System Improvements) | AMP 400 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR REQUIRED MATERIALS AS NEEDED   |          | \$5,765.77            |
| ID0431     | Copy of AMP 400 ARCHITECTURAL AND ENGINEERING * 2022(Contract Administration (1480)-Other Fees and Costs)  | AMP 400 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR   |          | \$5,803.92            |
| ID0436     | Copy of AMP 400 ON DEMAND * 2022(Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing)  | AMP 400 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$113,621.50          |
| ID0444     | Copy of AMP 400 NON-DWELLING EQUIPMENT * 2022(Non-Dwelling Equipment-<br>Expendable/Non-Expendable (1480)-Other)   | AMP 400 NON-DWELLING EQUIPMENT * PURCHASE STATIONARY POWER TOOLS, PAINT SHAKERS, PAINT STRIPING EQUIPMENT, SEWER CLEANING EQUIPMENT, LASER LEVELS, FLOOR BUFFERS, LARGE FLOOR CLEANING EQUIPMENT, VIDEO SURVEILLANCE EQUIPMENT  |          | \$7,254.90            |
| ID0449     | Copy of AMP 400 HEATING EQUIPMENT REPLACEMENT * 2022(Dwelling Unit-Interior (1480)-Mechanical)   | AMP 400 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR                      |          | \$40,000.00           |

Work Statement for Year 3

| Identifier | Development Number/Name  | General Description of Major Work Categories  | Quantity | <b>Estimated Cost</b> |
|------------|--|---|----------|-----------------------|
| ID0458     | Copy of AMP 400 AIR MAKE UP UNIT REPLACMENT(Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems)   | REPLACE CENTRAL AIR MAKE UP UNIT FOR 755  |          | \$35,000.00           |
| ID0459     | Copy of AMP 400 SIDING AND SOFFIT REPLACMENT(Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking) | AMP 400 REPLACE DEGREGATED WOOD SIDING AND WOOD SOFFIT  |          | \$60,000.00           |
| ID0460     | Copy of AMP 400 REPLACE BATHROOM VENTALATION(Dwelling Unit-Interior (1480)-Mechanical)   | 755 REPLACE OUT DATED BATHROOM VENTILATION WITH NEW   |          | \$20,000.00           |
|            | TRUAX PARK APARTMENTS LLC (WI003000500)  |   |          | \$165,416.23          |
| ID0418     | Copy of AMP 500 OPERATIONS * 2022(Operations (1406))   | AMP 500 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT  |          | \$41,416.00           |
| ID0426     | Copy of AMP 500 MANAGEMENT IMPROVEMENTS * TRAINING * 2022(Management Improvement (1408)-System Improvements, Management Improvement (1408)-Staff Training)                         | AMP 500 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE<br>NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR<br>REQUIRED MATERIALS AS NEEDED   |          | \$1,235.52            |
| ID0432     | Copy of AMP 500 ARCHITECTURAL AND ENGINEERING * 2022(Contract Administration (1480)-Other Fees and Costs)  | AMP 500 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$1,228.76            |

Work Statement for Year 3

| Identifier | Development Number/Name   | General Description of Major Work Categories  | Quantity | <b>Estimated Cost</b> |
|------------|---|---|----------|-----------------------|
| ID0437     | Copy of AMP 500 ON DEMAND * 2022(Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing) | AMP 500 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$30,000.00           |
| ID0438     | Copy of AMP 500 ON DEMAND * 2022(Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing) | AMP 500 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$30,000.00           |
| ID0445     | Copy of AMP 500 NON-DWELLING EQUIPMENT * 2022(Non-Dwelling Equipment-<br>Expendable/Non-Expendable (1480)-Other)  | AMP 500 NON-DWELLING EQUIPMENT * PURCHASE STATIONARY POWER TOOLS, PAINT SHAKERS, PAINT STRIPING EQUIPMENT, SEWER CLEANING EQUIPMENT, LASER LEVELS, FLOOR BUFFERS, LARGE FLOOR CLEANING EQUIPMENT, VIDEO SURVEILLANCE EQUIPMENT  |          | \$1,535.95            |
| ID0450     | Copy of AMP 500 HEATING EQUIPMENT REPLACEMENT * 2022(Dwelling Unit-Interior (1480)-Mechanical)                    | AMP 500 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR                      |          | \$10,000.00           |
| ID0457     | Copy of AMP 500 CONCRETE SIDWALK REPLACMENT(Non-Dwelling Site Work (1480)-Asphalt - Concrete - Paving)            | AMP 500 - Replace damaged and heaved concrete sidewalk. In conjunction with REAC inspection   |          | \$50,000.00           |
|            | SCATTERED SITE (WI003000200)  |   |          | \$562,297.02          |

Work Statement for Year 3

|            |   |   |          | 1                     |
|------------|---|---|----------|-----------------------|
| Identifier | Development Number/Name   | General Description of Major Work Categories  | Quantity | <b>Estimated Cost</b> |
| ID0419     | AMP 200 OPERATIONS * 2022(Operations (1406))  | AMP 200 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT  |          | \$96,638.00           |
| ID0421     | AMP 200 MANAGEMENT IMPROVEMENTS * TRAINING * 2022(Management Improvement (1408)-Staff Training, Management Improvement (1408)-System Improvements)  | AMP 200 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR REQUIRED MATERIALS AS NEEDED   |          | \$4,298.58            |
| ID0424     | Copy of AMP 200 PARKING RE-PAVE * 2022(Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Dumpsters and Enclosures,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Signage,Dwelling Unit-Site Work (1480)-Striping) | AMP 200 PARKING RE-PAVE * REMOVE BITUMINOUS ASPHALTIC CONCRETE, DETERIORATED CONCRETE CURB, UNSUITABLE SUPPORT BASE * INSTALL NEW SUPPORT BASE, NEW CONCRETE ACCESSORIES SUCH AS RAMPS, CURBS AND DUMPSTER ENSLOSURES, NEW STRIPING, SIGNAGE AS NEEDED. * NO FORCE LABOR  |          | \$100,000.00          |
| ID0429     | Copy of AMP 200 ARCHITECTURAL AND ENGINEERING * 2022(Contract Administration (1480)-Other Fees and Costs)   | AMP 200 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR   |          | \$15,000.00           |
| ID0434     | Copy of AMP 200 ON DEMAND * 2022(Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing)   | AMP 200 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$150,553.00          |
| ID0442     | Copy of AMP 200 NON-DWELLING EQUIPMENT * 2022(Non-Dwelling Equipment-<br>Expendable/Non-Expendable (1480)-Other)  | AMP 200 NON-DWELLING EQUIPMENT * PURCHASE STATIONARY POWER TOOLS, PAINT SHAKERS, PAINT STRIPING EQUIPMENT, SEWER CLEANING EQUIPMENT, LASER LEVELS, FLOOR BUFFERS, LARGE FLOOR CLEANING EQUIPMENT, VIDEO SURVEILLANCE EQUIPMENT  |          | \$5,261.44            |

Work Statement for Year 3

| Identifier | Development Number/Name   | General Description of Major Work Categories   | Quantity | <b>Estimated Cost</b> |
|------------|---|--|----------|-----------------------|
| ID0447     | Copy of AMP 200 HEATING EQUIPMENT REPLACEMENT * 2022(Dwelling Unit-Interior (1480)-Mechanical)  | AMP 200 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$90,546.00           |
| ID0461     | Copy of AMP 200 FIRE PANEL AND INTERCOM REPLACMENT(Dwelling Unit-Interior (1480)-Call-for-Aid Systems,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection) | REPLACE FIRE PANELS AND INTERCOM SYSTEMS IN AMP 200 PROPERTIES   |          | \$100,000.00          |
|            | TRUAX PHASE II (WI003000600)  |  |          | \$36,678.34           |
| ID0420     | Copy of AMP 600 OPERATIONS * 2022(Operations (1406))  | AMP 600 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT   |          | \$23,009.00           |
| ID0427     | Copy of AMP 600 MANAGEMENT IMPROVEMENTS * TRAINING * 2022(Management Improvement (1408)-Staff Training, Management Improvement (1408)-System Improvements)  | AMP 600 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE<br>NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR<br>REQUIRED MATERIALS AS NEEDED  |          | \$1,055.34            |
| ID0433     | Copy of AMP 600 ARCHITECTURAL AND ENGINEERING * 2022(Contract Administration (1480)-Other Fees and Costs)   | AMP 600 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | \$1,045.75            |
| ID0441     | Copy of AMP 600 EXTERIOR LIGHTING UPGRADES * 2022(Dwelling Unit-Site Work (1480)-<br>Lighting)  | AMP 600 EXTERIOR LIGHTING UPGRADES * REMOVE EXTERIOR -<br>LOW EFFICIENCY BULBS AND FIXTURES, COSTS TO INCLUDE<br>RECYCLING AS NEEDED * INSTALL NEW HIGH EFFICIENCY BULBS<br>AND FIXTURES * NO FORCE LABOR  |          | \$2,012.00            |

Work Statement for Year 3

| Identifier | Development Number/Name  | General Description of Major Work Categories   | Quantity | <b>Estimated Cost</b> |
|------------|--|--|----------|-----------------------|
| ID0446     | Copy of AMP 600 NON-DWELLING EQUIPMENT * 2022(Non-Dwelling Equipment-<br>Expendable/Non-Expendable (1480)-Other) | AMP 600 NON-DWELLING EQUIPMENT * PURCHASE STATIONARY POWER TOOLS, PAINT SHAKERS, PAINT STRIPING EQUIPMENT, SEWER CLEANING EQUIPMENT, LASER LEVELS, FLOOR BUFFERS, LARGE FLOOR CLEANING EQUIPMENT, VIDEO SURVEILLANCE EQUIPMENT   |          | \$1,307.19            |
| ID0451     | Copy of AMP 600 HEATING EQUIPMENT REPLACEMENT * 2022(Dwelling Unit-Interior (1480)-Mechanical)                   | AMP 600 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR     |          | \$4,124.53            |
| ID0453     | Copy of AMP 600 PROGRAMMATIC FLOORING REPACEMENT * 2022(Dwelling Unit-Interior (1480)-Flooring (non routine))    | AMP 600 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-<br>ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS *<br>INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL<br>MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED<br>BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$4,124.53            |
|            | AUTHORITY-WIDE (NAWASD)  |  |          | \$230,092.00          |
| ID0428     | Copy of CAPITAL FUND ADMINISTRATION * 2022(Administration (1410)-Salaries, Administration (1410)-Sundry)         | CAPITAL FUND PROGRAM FEE* PROVIDE ADMINISTRATION OF CAPITAL FUND GRANT FUNDS AND PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | \$230,092.00          |
|            | Subtotal of Estimated Cost   |  |          | \$2,341,461.00        |

Work Statement for Year 4

| Identifier | Development Number/Name  | General Description of Major Work Categories   | Quantity | <b>Estimated Cost</b> |
|------------|--|--|----------|-----------------------|
|            | SCATTERED SITE (WI003000200)   |  |          | \$665,688.81          |
| ID0489     | Copy of AMP 200 OPERATIONS * 2022(Operations (1406))   | AMP 200 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT   |          | \$96,638.00           |
| ID0502     | AMP 200 OPERATIONS (Operations (1406))   | AMP 200 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT   |          | \$98,341.00           |
| ID0503     | AMP 200 PROGRAMMATIC FLOORING REPACEMENT (Dwelling Unit-Interior (1480)-Flooring (non routine))  | AMP 200 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-<br>ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS *<br>INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL<br>MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED<br>BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$47,835.89           |
| ID0504     | AMP 200 MANAGEMENT IMPROVEMENTS * TRAINING (Management Improvement (1408)-Staff Training, Management Improvement (1408)-System Improvements) | AMP 200 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR REQUIRED MATERIALS AS NEEDED  |          | \$4,298.58            |
| ID0505     | AMP 200 ARCHITECTURAL AND ENGINEERING (Contract Administration (1480)-Other Fees and Costs)  | AMP 200 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | \$5,050.98            |
| ID0506     | AMP 200 HEATING EQUIPMENT REPLACEMENT (Dwelling Unit-Interior (1480)-Mechanical)   | AMP 200 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR     |          | \$178,550.04          |

| Part II: Sup | pporting Pages - Physical Needs Work Statements (s)  |   |          |                |
|--------------|--|---|----------|----------------|
| Work State   | ement for Year 4 2027  |   |          |                |
| Identifier   | Development Number/Name  | General Description of Major Work Categories  | Quantity | Estimated Cost |
|              |  |   |          |                |
| ID0507       | AMP 200 ON DEMAND (Dwelling Unit-Interior (1480)-Mechanical, Dwelling Unit-Interior (1480)-Plumbing)   | AMP 200 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$234,974.32   |
|              | BJARNES ROMNES APARTMENTS (WI003000300)  |   |          | \$644,029.09   |
| ID0490       | AMP 300 OPERATIONS (Operations (1406))   | AMP 300 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT  |          | \$173,268.00   |
| ID0491       | AMP 300 MANAGEMENT IMPROVEMENTS * TRAINING (Management Improvement (1408)-System Improvements, Management Improvement (1408)-Staff Training) | AMP 300 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE<br>NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR<br>REQUIRED MATERIALS AS NEEDED   |          | \$7,644.79     |
| ID0492       | AMP 300 ARCHITECTURAL AND ENGINEERING (Contract Administration (1480)-Other Fees and Costs)  | AMP 300 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR   |          | \$9,254.90     |
| ID0493       | AMP 300 PROGRAMMATIC FLOORING REPLACEMENT (Dwelling Unit-Interior (1480)-Flooring (non routine))   | AMP 300 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR                               |          | \$59,782.79    |

| Part II: Sup | pporting Pages - Physical Needs Work Statements (s)  |   |          |                       |
|--------------|--|---|----------|-----------------------|
| Work State   | ement for Year 4 2027  |   |          |                       |
| Identifier   | Development Number/Name  | General Description of Major Work Categories  | Quantity | <b>Estimated Cost</b> |
|              |  |   |          |                       |
| ID0494       | AMP 300 HEATING EQUIPMENT REPLACEMENT (Dwelling Unit-Interior (1480)-Mechanical)   | AMP 300 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR                      |          | \$59,782.79           |
| ID0495       | AMP 300 ON DEMAND(Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing)   | AMP 300 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$334,295.82          |
|              | BRITTINGHAM APARTMENTS (WI003000400)   |   |          | \$385,235.94          |
| ID0496       | AMP 400 OPERATIONS (Operations (1406))   | AMP 400 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT  |          | \$131,122.00          |
| ID0497       | AMP 400 MANAGEMENT IMPROVEMENTS * TRAINING (Management Improvement (1408)-Staff Training, Management Improvement (1408)-System Improvements) | AMP 400 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE<br>NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR<br>REQUIRED MATERIALS AS NEEDED   |          | \$5,765.77            |

Work Statement for Year 4

|            |  |   |          | 1                     |
|------------|--|---|----------|-----------------------|
| Identifier | Development Number/Name  | General Description of Major Work Categories  | Quantity | <b>Estimated Cost</b> |
| ID0498     | AMP 400 ARCHITECTURAL AND ENGINEERING (Contract Administration (1480)-Other Fees and Costs)          | AMP 400 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR   |          | \$6,964.71            |
| ID0499     | AMP 400 PROGRAMMATIC FLOORING REPACEMENT (Dwelling Unit-Interior (1480)-Flooring (non routine))      | AMP 400 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-<br>ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS *<br>INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL<br>MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED<br>BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR<br>PROGRAMMATIC FLOORING REPLACEMENT ON AN AS-VACATED<br>BASIS |          | \$39,978.64           |
| ID0500     | AMP 400 ON DEMAND (Dwelling Unit-Interior (1480)-Mechanical, Dwelling Unit-Interior (1480)-Plumbing) | AMP 400 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR   |          | \$201,404.82          |
|            | AUTHORITY-WIDE (NAWASD)  |   |          | \$230,092.00          |
| ID0501     | CAPITAL FUND PROGRAM FEE (Administration (1410)-Sundry, Administration (1410)-Salaries)              | CAPITAL FUND PROGRAM FEE * PROVIDE ADMINISTRATION OF CAPITAL FUND GRANT FUNDS AND PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | \$230,092.00          |
|            | TRUAX PARK APARTMENTS LLC (WI003000500)  |   |          | \$226,326.79          |

Work Statement for Year 4

| Identifier | Development Number/Name  | General Description of Major Work Categories  | Quantity | <b>Estimated Cost</b> |
|------------|--|---|----------|-----------------------|
| ID0508     | AMP 500 OPERATIONS (Operations (1406))   | AMP 500 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT  |          | \$42,146.00           |
| ID0509     | AMP 500 MANAGEMENT IMPROVEMENTS * TRAINING (Management Improvement (1408)-System Improvements, Management Improvement (1408)-Staff Training) | AMP 500 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE<br>NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR<br>REQUIRED MATERIALS AS NEEDED   |          | \$1,235.52            |
| ID0510     | AMP 500 ARCHITECTURAL AND ENGINEERING (Contract Administration (1480)-Other Fees and Costs)  | AMP 500 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR   |          | \$1,474.51            |
| ID0511     | AMP 500 PROGRAMMATIC FLOORING REPLACEMENT (Dwelling Unit-Interior (1480)-Flooring (non routine))   | AMP 500 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-<br>ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS *<br>INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL<br>MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED<br>BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR                  |          | \$9,680.97            |
| ID0512     | AMP 500 HEATING EQUIPMENT REPLACEMENT (Dwelling Unit-Interior (1480)-Mechanical)   | AMP 500 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR                      |          | \$27,249.47           |
| ID0513     | AMP 500 ON DEMAND (Dwelling Unit-Interior (1480)-Mechanical, Dwelling Unit-Interior (1480)-Plumbing)   | AMP 500 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$144,540.32          |

Work Statement for Year 4

| Identifier | Development Number/Name  | General Description of Major Work Categories   | Quantity | <b>Estimated Cost</b> |
|------------|--|--|----------|-----------------------|
|            | TRUAX PHASE II (WI003000600)   |  |          | \$190,088.37          |
| ID0514     | AMP 600 OPERATIONS (Operations (1406))   | AMP 600 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT   |          | \$23,415.00           |
| ID0515     | AMP 600 MANAGEMENT IMPROVEMENTS * TRAINING (Management Improvement (1408)-System Improvements, Management Improvement (1408)-Staff Training) | AMP 600 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR REQUIRED MATERIALS AS NEEDED  |          | \$1,055.34            |
| ID0516     | AMP 600 ARCHITECTURAL AND ENGINEERING (Contract Administration (1480)-Other Fees and Costs)  | AMP 600 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | \$1,254.90            |
| ID0517     | AMP 600 PROGRAMMATIC FLOORING REPACEMENT (Dwelling Unit-Interior (1480)-Flooring (non routine))  | AMP 600 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR          |          | \$4,124.53            |
| ID0518     | AMP 600 HEATING EQUIPMENT REPLACEMENT (Dwelling Unit-Interior (1480)-Mechanical)   | AMP 600 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$21,693.03           |
| ID0519     | AMP 600 ON DEMAND (Dwelling Unit-Interior (1480)-Mechanical, Dwelling Unit-Interior (1480)-Plumbing)   | AMP 600 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF         |          | \$138,545.57          |

| Part II: Supporting Pages - Physical Needs Work Statements (s) |                            |      |  |          |                |
|--|----------------------------|------|--|----------|----------------|
| Work State   | nent for Year 4            | 2027 |  |          |                |
| Identifier   | Development Number/Name    |      | General Description of Major Work Categories | Quantity | Estimated Cost |
|  |                            |      | ENCOUNTERED * NO FORCE LABOR                 |          |                |
|  |                            |      |  |          |                |
|  | Subtotal of Estimated Cost |      |  |          | \$2,341,461.00 |
|  |                            |      |  |          |                |

Work Statement for Year 5

| Identifier | Development Number/Name  | General Description of Major Work Categories   | Quantity | <b>Estimated Cost</b> |
|------------|--|--|----------|-----------------------|
|            | TRUAX PHASE II (WI003000600)   |  |          | \$140,088.37          |
| ID0525     | Copy of AMP 600 OPERATIONS * 2024(Operations (1406))   | AMP 600 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT   |          | \$23,415.00           |
| ID0526     | Copy of AMP 600 MANAGEMENT IMPROVEMENTS * TRAINING * 2024(Management Improvement (1408)-Staff Training, Management Improvement (1408)-System Improvements) | AMP 600 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE<br>NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR<br>REQUIRED MATERIALS AS NEEDED  |          | \$1,055.34            |
| ID0527     | Copy of AMP 600 ARCHITECTURAL AND ENGINEERING * 2024(Contract Administration (1480)-Other Fees and Costs)  | AMP 600 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | \$1,254.90            |
| ID0528     | Copy of AMP 600 PROGRAMMATIC FLOORING REPACEMENT * 2024(Dwelling Unit-Interior (1480)-Flooring (non routine))  | AMP 600 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR          |          | \$4,124.53            |
| ID0529     | Copy of AMP 600 HEATING EQUIPMENT REPLACEMENT * 2024(Dwelling Unit-Interior (1480)-Mechanical)   | AMP 600 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$21,693.03           |
| ID0530     | Copy of AMP 600 ON DEMAND * 2024(Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing)  | AMP 600 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF         |          | \$88,545.57           |

| Part II: Sup | pporting Pages - Physical Needs Work Statements (s)  |  |          |                |
|--------------|--|--|----------|----------------|
| Work State   | ement for Year 5 2028  |  |          |                |
| Identifier   | Development Number/Name  | General Description of Major Work Categories   | Quantity | Estimated Cost |
|              | 1  | ENCOUNTERED * NO FORCE LABOR   |          | <u> </u>       |
|              | TRUAX PARK APARTMENTS LLC (WI003000500)  |  |          | \$176,326.79   |
|              |  |  |          | φ1, 0,0 2017   |
| ID0531       | Copy of AMP 500 OPERATIONS * 2024(Operations (1406))   | AMP 500 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT   |          | \$42,146.00    |
| ID0532       | Copy of AMP 500 MANAGEMENT IMPROVEMENTS * TRAINING * 2024(Management Improvement (1408)-System Improvements, Management Improvement (1408)-Staff Training) | AMP 500 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE<br>NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR<br>REQUIRED MATERIALS AS NEEDED  |          | \$1,235.52     |
| ID0533       | Copy of AMP 500 ARCHITECTURAL AND ENGINEERING * 2024(Contract Administration (1480)-Other Fees and Costs)  | AMP 500 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | \$1,474.51     |
| ID0534       | Copy of AMP 500 PROGRAMMATIC FLOORING REPLACEMENT * 2024(Dwelling Unit-Interior (1480)-Flooring (non routine))   | AMP 500 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-<br>ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS *<br>INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL<br>MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED<br>BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$9,680.97     |
| ID0535       | Copy of AMP 500 HEATING EQUIPMENT REPLACEMENT * 2024(Dwelling Unit-Interior (1480)-Mechanical)   | AMP 500 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR     |          | \$27,249.47    |

| Part II: Su | pporting Pages - Physical Needs Work Statements (s)   |   |          |                |
|-------------|---|---|----------|----------------|
| Work State  | ement for Year 5 2028   |   |          |                |
| Identifier  | Development Number/Name   | General Description of Major Work Categories  | Quantity | Estimated Cost |
|             |   |   |          |                |
| ID0536      | Copy of AMP 500 ON DEMAND * 2024(Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing) | AMP 500 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$94,540.32    |
|             | SCATTERED SITE (WI003000200)  |   |          | \$669,050.81   |
| ID0537      | Copy of AMP 200 OPERATIONS * 2024(Operations (1406))  | AMP 200 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT  |          | \$98,341.00    |
| ID0538      | Copy of AMP 200 PROGRAMMATIC FLOORING REPACEMENT * 2023(Dwelling Unit-Interior (1480)-Flooring (non routine))     | AMP 200 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR                               |          | \$47,835.89    |
| ID0539      | Copy of AMP 200 MANAGEMENT IMPROVEMENTS * TRAINING * 2024(Management Improvement (1408)-System Improvements)      | AMP 200 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR REQUIRED MATERIALS AS NEEDED   |          | \$4,298.58     |
| ID0540      | Copy of AMP 200 ARCHITECTURAL AND ENGINEERING * 2024(Contract Administration (1480)-Other Fees and Costs)         | AMP 200 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR   |          | \$5,050.98     |

| Part II: Sup | pporting Pages - Physical Needs Work Statements (s)   |   |          |                |
|--------------|---|---|----------|----------------|
| Work State   | ement for Year 5 2028   |   |          |                |
| Identifier   | Development Number/Name   | General Description of Major Work Categories  | Quantity | Estimated Cost |
|              |   |   |          |                |
| ID0541       | Copy of AMP 200 HEATING EQUIPMENT REPLACEMENT * 2024(Dwelling Unit-Interior (1480)-Mechanical)                    | AMP 200 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR                      |          | \$178,550.04   |
| ID0542       | Copy of AMP 200 ON DEMAND * 2024(Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing) | AMP 200 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$134,974.32   |
| ID0543       | Copy of AMP 200 A Site Window Replacment(Dwelling Unit-Exterior (1480)-Windows)                                   | Replace old none efficient windows with double hung energy efficient windows. NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR   |          | \$100,000.00   |
| ID0544       | Copy of AMP 200 B Site Window Replacement(Dwelling Unit-Exterior (1480)-Windows)                                  | Replace old non-efficient windows with energy efficient double hung windows. NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | \$100,000.00   |
|              | AUTHORITY-WIDE (NAWASD)   |   |          | \$230,092.00   |

Work Statement for Year 5

| Identifier | Development Number/Name   | General Description of Major Work Categories   | Quantity | <b>Estimated Cost</b> |
|------------|---|--|----------|-----------------------|
| ID0545     | Copy of CAPITAL FUND PROGRAM FEE * 2024(Administration (1410)-Sundry,Administration (1410)-Salaries)  | CAPITAL FUND PROGRAM FEE * PROVIDE ADMINISTRATION OF CAPITAL FUND GRANT FUNDS AND PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR   |          | \$230,092.00          |
|            | BRITTINGHAM APARTMENTS (WI003000400)  |  |          | \$481,873.94          |
| ID0546     | Copy of AMP 400 OPERATIONS * 2024(Operations (1406))  | AMP 400 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT   |          | \$131,122.00          |
| ID0547     | Copy of AMP 400 MANAGEMENT IMPROVEMENTS * TRAINING * 2024(Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements) | AMP 400 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE<br>NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR<br>REQUIRED MATERIALS AS NEEDED  |          | \$5,765.77            |
| ID0548     | Copy of AMP 400 ARCHITECTURAL AND ENGINEERING * 2024(Contract Administration (1480)-Other Fees and Costs)   | AMP 400 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | \$6,964.71            |
| ID0549     | Copy of AMP 400 PROGRAMMATIC FLOORING REPACEMENT * 2024(Dwelling Unit-Interior (1480)-Flooring (non routine))   | AMP 400 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR PROGRAMMATIC FLOORING REPLACEMENT ON AN AS-VACATED BASIS |          | \$39,978.64           |
| ID0550     | Copy of AMP 400 ON DEMAND * 2024(Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing)   | AMP 400 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF   |          | \$198,042.82          |

| Part II: Suj | pporting Pages - Physical Needs Work Statements (s)   |  |          |                |
|--------------|---|--|----------|----------------|
| Work State   | ement for Year 5 2028   |  |          |                |
| Identifier   | Development Number/Name   | General Description of Major Work Categories   | Quantity | Estimated Cost |
|              |   | ENCOUNTERED * NO FORCE LABOR   |          | <u> </u>       |
| ID0551       | Copy of AMP 400 HEATING EQUIPMENT REPLACEMENT (Dwelling Unit-Interior (1480)-   | AMP 400 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS,   |          | \$100,000.00   |
|              | Mechanical, Dwelling Unit-Interior (1480)-Plumbing, Non-Dwelling Construction - Mechanical (1480)-Central Boiler, Non-Dwelling Construction - Mechanical (1480)-Central Chiller, Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems, Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System, Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters, Non-Dwelling Interior (1480)-Electrical, Non-Dwelling Interior (1480)-Mechanical, Non-Dwelling Interior (1480)-Plumbing) | GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | ψ100,000.00    |
|              | BJARNES ROMNES APARTMENTS (WI003000300)   |  |          | \$644,029.09   |
| ID0552       | Copy of AMP 300 OPERATIONS * 2024(Operations (1406))  | AMP 300 OPERATIONS * PROVIDE SITE OPERATIONS SUPPORT   |          | \$173,268.00   |
| ID0553       | Copy of AMP 300 MANAGEMENT IMPROVEMENTS * TRAINING * 2024(Management Improvement (1408)-Staff Training, Management Improvement (1408)-System Improvements)  | AMP 300 MANAGEMENT IMPROVEMENTS * TRAINING * REMOVE<br>NONE * TRAINING FOR ALL STAFF - INCLUDES TRAVEL AND/OR<br>REQUIRED MATERIALS AS NEEDED  |          | \$7,644.79     |
| ID0554       | Copy of AMP 300 ARCHITECTURAL AND ENGINEERING * 2024(Contract Administration (1480)-Other Fees and Costs)   | AMP 300 ARCHITECTURAL AND ENGINEERINGNONE * PROVIDE ADVICE, DRAWINGS AND SPECIFICATIONS FOR TECHNICAL OR COMPLEX PROJECTS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | \$9,254.90     |
| ID0555       | Copy of AMP 300 PROGRAMMATIC FLOORING REPLACEMENT * 2024(Dwelling Unit-Interior (1480)-Flooring (non routine))  | AMP 300 PROGRAMMATIC FLOORING REPACEMENT * REMOVE NON-<br>ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL MATERIALS *<br>INSTALL NON-ASBESTOS VINYL COMPOSITION TILE & SHEET VINYL<br>MATERIALS * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED<br>BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$59,782.79    |

| Part II: Su | pporting Pages - Physical Needs Work Statements (s)   |   |          |                |
|-------------|---|---|----------|----------------|
| Work State  | ement for Year 5 2028   |   |          |                |
| Identifier  | Development Number/Name   | General Description of Major Work Categories  | Quantity | Estimated Cost |
|             |   |   |          |                |
| ID0556      | Copy of AMP 300 HEATING EQUIPMENT REPLACEMENT * 2024(Dwelling Unit-Interior (1480)-Mechanical)                    | AMP 300 HEATING EQUIPMENT REPLACEMENT * REMOVE NAT. GAS, GRAVITY VENT, LOW EFF, FORCED AIR FURNACE * INSTALL NAT. GAS, POWERED VENT, HIGH EFF, FORCED AIR FURNACE * NO DUCT WORK * NO PIPING * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR                      |          | \$59,782.79    |
| ID0557      | Copy of AMP 300 ON DEMAND * 2024(Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing) | AMP 300 ON DEMAND * REMOVE WATER SOFTENERS, HEAT EXCHANGERS, BOILERS, AND ASSOCIATED PIPING * INSTALL LOW SALT WATER SOFTENERS, HIGH EFFICIENCY HEAT EXCHANGERS, HIGH EFFICIENCY BOILERS AND, ASSOCIATED PIPING * * NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR |          | \$134,295.82   |
| ID0558      | Copy of AMP 300 Boiler Replacment Romnes (Non-Dwelling Interior (1480)-Mechanical)                                | Replace older boilers ( Parts are harder to find) with new energy efficient boilers. NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | \$100,000.00   |
| ID0559      | Copy of AMP 300 Roof Replacment (Dwelling Unit-Exterior (1480)-Roofs)   | Replace pass life expectancy roof with new 30 year roof. Baird/Fisher units. NO LBP, OR ASBESTOS, ABATEMENT ANTICIPATED BUT WILL REMEDIATE IF ENCOUNTERED * NO FORCE LABOR  |          | \$100,000.00   |
|             | Subtotal of Estimated Cost  |   |          | \$2,341,461.00 |

| Part III: Supporting Pages - Management Needs Work Statements (s)                             |                |  |  |
|---|----------------|--|--|
| Work Statement for Year 1 2024  |                |  |  |
| Development Number/Name<br>General Description of Major Work Categories                       | Estimated Cost |  |  |
| Housing Authority Wide  |                |  |  |
| CAPITAL FUND PROGRAM FEE * 2024(Administration (1410)-Salaries, Administration (1410)-Sundry) | \$230,092.00   |  |  |
| Subtotal of Estimated Cost  | \$230,092.00   |  |  |

| Part III: Supporting Pages - Management Needs Work Statements (s)                         |                |  |
|---|----------------|--|
| Work Statement for Year 2 2025  |                |  |
| Development Number/Name<br>General Description of Major Work Categories                   | Estimated Cost |  |
| Housing Authority Wide  |                |  |
| CAPITAL FUND PROGRAM FEE * (Administration (1410)-Salaries, Administration (1410)-Sundry) | \$230,092.00   |  |
| Subtotal of Estimated Cost  | \$230,092.00   |  |

| Part III: Supporting Pages - Management Needs Work Statements (s)  |                |  |
|--|----------------|--|
| Work Statement for Year 3 2026   |                |  |
| Development Number/Name<br>General Description of Major Work Categories                                  | Estimated Cost |  |
| Housing Authority Wide   |                |  |
| Copy of CAPITAL FUND ADMINISTRATION * 2022(Administration (1410)-Salaries, Administration (1410)-Sundry) | \$230,092.00   |  |
| Subtotal of Estimated Cost   | \$230,092.00   |  |

| Part III: Supporting Pages - Management Needs Work Statements (s)                       |                |  |
|---|----------------|--|
| Work Statement for Year 4 2027  |                |  |
| Development Number/Name<br>General Description of Major Work Categories                 | Estimated Cost |  |
| Housing Authority Wide  |                |  |
| CAPITAL FUND PROGRAM FEE (Administration (1410)-Sundry, Administration (1410)-Salaries) | \$230,092.00   |  |
| Subtotal of Estimated Cost  | \$230,092.00   |  |

| Part III: Supporting Pages - Management Needs Work Statements (s)                                     |                |  |
|---|----------------|--|
| Work Statement for Year 5 2028  |                |  |
| Development Number/Name<br>General Description of Major Work Categories                               | Estimated Cost |  |
| Housing Authority Wide  |                |  |
| Copy of CAPITAL FUND PROGRAM FEE * 2024(Administration (1410)-Sundry, Administration (1410)-Salaries) | \$230,092.00   |  |
| Subtotal of Estimated Cost  | \$230,092.00   |  |

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan (All PHAs)

I, James O'Keefe

#### U. S Department of Housing and Urban Development

, the Director, City of Madison Community Development Division

Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

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

| Official's Name   | Official's Title   |
|---|--|
|   | for fiscal years 2020-2024 and/or Annual PHA Plan for fiscal oment Authority, City of Madison is consistent with the PHA Name  |
|   | ated Plan including the Analysis of Impediments (AI) to Fair air Housing (AFH) as applicable to the  |
| City of Madison, WI   | Local Jurisdiction Name  |
|   |  |
| pursuant to 24 CFR Part 91 and 24 C                           | CFR § 903.15.  |
| Provide a description of how the PH. State Consolidated Plan. | A Plan's contents are consistent with the Consolidated Plan or   |
| The Community Development Author                              | ority's 2024 PHA Plan goals and objectives are consistent with   |
| The housing needs outlined in the Ci                          | ty of Madison's Consolidated Plan for 2020 - 2024 and  |
| Analysis of Impediments (AI) to Fair                          | r Housing Choice   |
|   |  |
|   | any information provided in the accompaniment herewith, is true and accurate. <b>Warning:</b> HUD will a criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802) |
| Name of Authorized Official:                                  | Title:   |
| James O'Keefe   | Director, City of Madison Community Development Division   |
| Signature: Types & Keefe                                      | Date: 08/04/2023   |
|   |  |

The baited states Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

# Certification for a Drug-Free Workplace

## U.S. Department of Housing and Urban Development

| Applicant Name  |                                   |   |  |                           |
|---|-----------------------------------|---|--|---------------------------|
| Community Development Authority, City of  | f Madison                         |   |  |                           |
| Program/Activity Receiving Federal Grant Funding  |                                   |   | ·  |                           |
|   | 10 " 011                          | wit out was now   |  |                           |
| Public Housing Program, Capital Fund P  | rogram, and Section 8 H           | ousing Choice Voucher Pro   | gram   |                           |
| Acting on behalf of the above named Athe Department of Housing and Urban De   |                                   |   | lowing certifications and agreements to :  |                           |
| I certify that the above named Applican   | at will or will continue          | (1) Abide by the  | e terms of the statement; and  |                           |
| to provide a drug-free workplace by:  |                                   | (2) Notify the er   | nployer in writing of his or her convic-   |                           |
| a. Publishing a statement notifying er<br>lawful manufacture, distribution, dispensi<br>of a controlled substance is prohibited in  | ng, possession, or use            | workplace no later than:  | criminal drug statute occurring in the five calendar days after such conviction;     |                           |
| place and specifying the actions that will be taken against employees for violation of such prohibition.  |                                   | 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.                            |  |                           |
| b. Establishing an on-going drug-free inform employees  | awareness program to              | Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on   |  |                           |
| (1) The dangers of drug abuse in  | the workplace;                    | whose grant activity the convicted employee was we<br>unless the Federalagency has designated a central point<br>receipt of such notices. Notice shall include the identifi-<br>number(s) of each affected grant; |  |                           |
| (2) The Applicant's policy of ma workplace;   | intaining a drug-free             |   |  |                           |
| (3) Any available drug counselin employee assistance programs; and  | g, rehabilitation, and            | days of receiving notice  | following actions, within 30 calendar under subparagraph d.(2), with respect         |                           |
| <ul><li>(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.</li><li>c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement</li></ul> |                                   | (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                             |  |                           |
|   |                                   |   |  | required by paragraph a.; |
| d. Notifying the employee in the states graph a. that, as a condition of employme employee will   |                                   | proved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;  |  |                           |
|   |                                   |   | th effort to continue to maintain a drug-<br>implementation of paragraphs a. thru f. |                           |
| 2. Sites for Work Performance. The Application HUD funding of the program/activity show Identify each sheet with the Applicant names.   | wn above: Place of Perform        | mance shall include the street  | t address, city, county, State, and zip code.  |                           |
| Central Office  | East Site                         | West Site   | Triangle Site  |                           |
| 215 Martin Luther King, Jr., Blvd.<br>Suite 161   | 3538 Straubel Street<br>Suite 101 | 540 W. Olin Avenue<br>Suite 200   | 702 Braxton Place<br>Madison, WI 53715   |                           |
| Madison, WI 53703   | Madison WI 53704                  | Madison WI 53715  | mandon, with a series  |                           |
| Dane County   | Dane County                       | Dane County   | Dane County  |                           |
| Check here if there are workplaces on file that   |                                   |   |  |                           |
| I hereby certify that all the information state<br>Warning: HUD will prosecute false claims and<br>(18 U.S.C. 1001, 1010, 1012; 31 U.   | statements. Conviction may        | *   | •  |                           |
| Name of Authorized Official   |                                   | Title   |  |                           |
| Matthew Wachter   |                                   | Executive Director  |  |                           |
| Signature   |                                   | Date /  | 0.02   |                           |

#### **Certification of Payments** to Influence Federal Transactions

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

Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality.

HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

Applicant Name

Community Development Authority, City of Madison

Program/Activity Receiving Federal Grant Funding

Public Housing Program, Capital Fund Program, Section 8 Housing Choice Voucher Program

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 sub recipients 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 a | Authori | ized | Offici | a |
|------|------|---------|------|--------|---|
|      |      |         |      |        |   |

Title

Matthew Wachter

**Executive Director** 

10-12-2023

Date (mm/dd/yyyy)

# Civil Rights Certification (Qualified PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB Approval No. 2577-0226
Expires 3/31/2024

#### **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 Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan, hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning January 1, 2024 in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency 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 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that

| require the PHA's involvement; and maintains records ref   | lecting these analyses and actions.       |
|--|---|
| Community Development Authority, City of Madison PHA Name  | WI-003 . PHA Number/HA Code               |
| I hereby certify that all the statement above, as well as any information provided in the false claims and statements. Conviction may result in criminal and/or civil penalties. ( |   |
| Name of Executive Director: Matthew Wachter  | Name of Board Chairperson: Claude Gilmore |
| Signature MN W Date 10-12-2033   | Signature Claude Gilmore 10/12/2023 Date  |
| The United States Department of Housing and Urban Development is authorized to collect the   |   |

The United States Department of Housing and Urban Development is authorized to collect the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. The information is collected to ensure that PHAs carry out applicable civil rights requirements.

Public reporting burden for this information collection is estimated to average 0.16 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

# Certifications of Compliance with PHA Plan and Related Regulations (Standard, Troubled, HCV-Only, and High Performer PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

## PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson 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, hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning \_\_2024\_, 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 (24 CFR § 91.2).
- 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 (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
- 3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (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.
- 4. 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.
- 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 public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
- 7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
- 8. For PHA Plans that include 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 2011-65);

- 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 a 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 a waiting list is consistent with affirmatively furthering fair housing; and
- 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 903.7(o)(1).
- The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act
- 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- 11. 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.
- 12. 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.
- 13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- 15. The PHA will provide 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.
- 16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- 17. The PHA will keep records in accordance with 2 CFR 200,333 and facilitate an effective audit to determine compliance with program requirements.
- 18. 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.
- 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
- 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
- 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the 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.
- 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

| Community Development Authority, City of PHA Name  | f Madison   | WI-003<br>PHA Number/HA Code        | <u>.</u>                |
|--|-------------|-------------------------------------|-------------------------|
| √ Annual PHA Plan for Fiscal Year <u>2024</u>  | _           |                                     |                         |
| 5-Year PHA Plan for Fiscal Years 20  | - 20        |                                     |                         |
| I hereby certify that all the information stated herein, as well as an prosecute false claims and statements. Conviction may result in cri |             |                                     |                         |
| Name of Executive Director: Matthew Wachter  |             | Name Board Chairman: Claude Gilmore |                         |
| Signature MM M   | Date 10-12- | Claude Gilmore Signature            | 10/12/2023<br>Date      |
|  | Page        | 2 of 3 form HIID-50077              | 7-ST-HCV-HP (3/31/2024) |

### COMMUNITY DEVELOPMENT AUTHORITY OF THE CITY OF MADISON, WISCONSIN

| Resolution No. 4565                        | Presented October 12, 2023 |
|--|----------------------------|
|  | Referred                   |
| Authorizing the submission of the required | Reported Back              |
| PHA Annual Plan and Capital Fund Plan for  | Adopted October 12, 2023   |
| Fiscal Year 2024                           | Placed on File             |
|  | Moved By Gray              |
|  | Seconded By Strickland     |
|  | Yeas 6 Nays 0 Absent 1     |
|  | Rules Suspended            |
|  | Legistar File Number 80264 |

#### RESOLUTION

**WHEREAS**, The U.S. Housing Act of 1937 [Section 9 and Section 511 of the Quality Housing and Work Responsibility Act (QHWRA)] established a Public Housing Authority (PHA) Annual Plan and Capital Fund Plan requirement; and

**WHEREAS**, The PHA Annual Plan is a comprehensive guide to PHA policies, programs, operations, and strategies for meeting local housing needs and goals; and

**WHEREAS**, The Capital Fund Plan provides the PHA's goals and strategies for addressing Public Housing capital needs; and

**WHEREAS**, The Community Development Authority (CDA) of the City of Madison has prepared the 2024 PHA Annual Plan and Capital Fund Plan; and

**WHEREAS**, the draft Annual PHA and Capital Fund Plans are posted on the CDA website, https://www.cityofmadison.com/dpced/housing/annual-plans/465/; and

**WHEREAS**, The CDA has engaged in a process to seek public comments on the PHA Annual Plan and Capital Fund Plan; and

**WHEREAS**, The CDA Resident Advisory Board (RAB) has reviewed the PHA Annual Plan and Capital Fund Plan.

**NOW, THEREFORE, BE IT RESOLVED**, the CDA Board of Commissioners authorizes CDA Staff to submit to the U.S. Department of Housing and Urban Development (HUD), documents related to the 2024 PHA Annual Plan and Capital Fund Plan, as required by HUD.