CDA Housing Operations

Agency Budget by Fund

Fund	2021 Actual	2022 Adopted	2022 Actual	2023 Adopted	2024 C2C	2024 Request
CDA	26,021,099	31,932,415	26,500,881	30,113,693	30,573,823	33,593,670
Total	26,021,099	31,932,415	26,500,881	30,113,693	30,573,823	33,593,670

Agency Budget by Service

Service	2021 Actual	2022 Adopted	2022 Actual	2023 Adopted	2024 C2C	2024 Request
Housing Vouchers	17,332,387	22,485,437	17,995,516	19,753,795	19,924,140	21,708,725
Public Housing	8,688,712	9,446,978	8,505,365	10,359,898	10,649,683	11,884,945
Total	26,021,099	31,932,415	26,500,881	30,113,693	30,573,823	33,593,670

Agency Budget by Major-Revenue

Major Revenue	2021 Actual	2022 Adopted	2022 Actual	2023 Adopted	2024 C2C	2024 Request
Intergov Revenues	(20,481,988)	(26,670,821)	(20,633,736)	(23,808,081)	(23,808,081)	(26,682,485)
Charges For Services	(3,814,704)	(3,998,282)	(3,666,472)	(4,198,677)	(4,198,677)	(4,023,371)
Invest Other Contrib	(20,051)	-	(126,303)	(39,531)	(39,531)	(58,317)
Misc Revenue	(126,784)	(93,911)	(442,705)	(46,853)	(46,853)	(60,529)
Other Finance Source	(974,768)	(464,998)	(25,394)	(1,374,815)	(1,855,494)	(2,066,530)
Transfer In	(602,805)	(704,404)	(562 <i>,</i> 465)	(645,737)	(645,737)	(702,438)
Total	(26,021,099)	(31,932,415)	(25,457,075)	(30,113,693)	(30,594,373)	(33,593,670)

Agency Budget by Major-Expense

Major Expense	2021 Actual	2022 Adopted	2022 Actual	2023 Adopted	2024 C2C	2024 Request
Salaries	3,171,820	3,696,625	3,362,724	3,931,795	4,184,552	4,146,130
Benefits	751,718	1,113,215	1,254,658	1,304,763	1,395,792	1,393,427
Supplies	511,365	639,202	584,077	698,798	698,798	710,426
Purchased Services	18,864,347	24,807,712	20,037,217	22,486,412	22,619,122	25,606,472
Debt Othr Financing	1,836,207	430,526	385,228	499,600	499,600	489,345
Inter Depart Charges	765,314	828,825	902,290	1,003,118	986,752	1,092,103
Inter Depart Billing	(482,476)	(625,333)	(587,777)	(704,216)	(704,216)	(810,405)
Transfer Out	602,805	1,041,644	562,465	893,424	893,424	966,172
Total	26,021,099	31,932,415	26,500,881	30,113,693	30,573,823	33,593,670

TO:	Mayor Satya Rhodes-Conway
FROM:	Wachter, Matt
DATE:	July 21, 2023
SUBJECT:	2024 Operating Budget Transmittal Memo
CC:	Deputy Mayors; Finance Director, Budget & Program Evaluation Staff

Goals of The CDA's Operating Budget

The mission of the CDA Housing Operations is to continue to allow access of households with lower incomes to affordable housing in every Madison neighborhood. This mission directly corresponds to the directive laid out by the Imagine Madison Neighborhoods and Housing Element of a Great City. The CDA acknowledges that in the pursuit of housing stability a household experiences a process equivalent to the Maslow Hierarchy of Needs. The CDA Housing Operations Division offers two services: Housing Vouchers and Public Housing to assist households in their journey through the various steps of housing stability.

Housing Vouchers

The Section 8 Housing Choice Voucher Program contributes to the Neighborhood and Housing element as the vouchers are used to subsidize market rate rentals throughout the community to an affordable level for households with incomes below 50 percent of area median income creating neighborhood accessibility to city residents of all income levels. The private market rent is subsidized to bring the participant's rental payment to within 30% of their income. The program currently supports an average of 1,900 households throughout the community. Participation is limited by Federal funding availability.

The major goal for 2024 is to continue to maintain the number of families receiving Section 8 assistance and increase program participation through utilization of Mainstream & American Rescue Act vouchers options as well as any future possible voucher funding extensions.

Public Housing

This service provides public housing assistance across the City of Madison through Community Development Authority (CDA) owned and operated developments. The CDA owns, manages, and maintains 742 units of Low Rent Public Housing with funding from the Federal Department of Housing and Urban Development (HUD). It also owns, manages, and maintains 116 multifamily units with funding from Wisconsin Housing and Economic Development Authority (WHEDA) & 24 Project-Based Voucher Units. This service is available to residents with income below 80 percent of area median income, with priority given to the elderly, disabled, and families with minor children and operates within strict compliance of the Fair Housing Act. Residents in CDA housing pay 30 percent of adjusted gross income for rent and utilities.

The major goals for 2024 are to continue to implement operational efficiencies in order to continue to create short unit turnaround times, high occupancy rates, and continue repositioning and redevelopment of public housing in accordance with HUD guidance.

Enterprise Agencies

Per HUD, the CDA will receive an overall increase in Housing Operating Subsidy, Capital Fund Grant, and Housing Choice Voucher funding. This increase is offset by continued increases in market pressures, market rents, and cost inflation. The CDA continues to strategically plan reserve usage in 2024 to support operations as well as redevelopment activities.

In both Public Housing and Housing Choice Voucher Programs, the programs are designed to reduce a participant's rent to 30% of their income. If a participant's income is reduced, their rent will also decrease insulating participants from the continued pressure the CDA experiences from increased market costs for maintenance, supplies, utilities, and property taxes.

In the event of a shortfall the CDA utilizes reserve funding, operational efficiencies, repositioning, and grant seeking activities to bridge the gaps.

Reallocations and Other Changes

The CDA shall continue to be net-neutral to the General Fund, however, the CDA will experience various changes to almost every major line items as described in the attached service proposal due to the nature of its funding and market-driven operational needs.

The CDA appreciates the importance of its role in creating safe, sanitary, and affordable housing options in the city of Madison. The need for affordable housing in our community has never been greater and we look forward to being a partner in the solution.

Sincerely,

Matt Wachter Executive Director Community Development Authority

Service Changes - Official Request

The table below summarizes the Agency request compared to cost-to-continue. Data is based on the line item budget entered in Munis Central Budget. The table is organized by Fund, Service, and Major Expenditure/ Revenue category.

Projection Number	(Multiple Items)
	92 - CDA HOUSING
Segment 3	OPERATIONS

	Cost to Continue		Change: Request v.
Fund/Service/Major	(C2C)	Request	C2C
5100 - CDA	-\$20,550	\$0	\$20,550
922 - HOUSING VOUCHERS	\$170,345	\$0	-\$170,345
42 - INTERGOV REVENUES	-\$19,555,000	-\$21,488,463	-\$1,933,463
43 - CHARGES FOR SERVICES	-\$1,000	-\$1,000	\$0
46 - INVEST OTHER CONTRIB	-\$4,000	-\$20,000	-\$16,000
47 - MISC REVENUE	-\$3,000	-\$5,000	-\$2,000
48 - OTHER FINANCE SOURCE	-\$190,795	-\$194,262	-\$3,467
51 - SALARIES	\$1,139,194	\$1,230,089	\$90,895
52 - BENEFITS	\$424,282	\$424,282	\$0
53 - SUPPLIES	\$72,392	\$59,045	-\$13,347
54 - PURCHASED SERVICES	\$18,221,992	\$19,926,415	\$1,704,423
56 - DEBT OTHR FINANCING	\$0	\$180	\$180
57 - INTER DEPART CHARGES	\$66,280	\$68,715	\$2,435
59 - TRANSFER OUT	\$0	\$0	\$0
921 - PUBLIC HOUSING	-\$190,894	\$0	\$190,894
42 - INTERGOV REVENUES	-\$4,253,081	-\$5,194,022	-\$940,941
43 - CHARGES FOR SERVICES	-\$4,197,677	-\$4,022,371	\$175,306
46 - INVEST OTHER CONTRIB	-\$35,531	-\$38,317	-\$2,786
47 - MISC REVENUE	-\$43,853	-\$55,529	-\$11,676
48 - OTHER FINANCE SOURCE	-\$1,664,699	-\$1,872,268	-\$207,569
49 - TRANSFER IN	-\$645,737	-\$702,438	-\$56,701
51 - SALARIES	\$3,045,358	\$2,916,042	-\$129,316
52 - BENEFITS	\$971,511	\$969,146	-\$2,365
53 - SUPPLIES	\$626,406	\$651,381	\$24,975
54 - PURCHASED SERVICES	\$4,397,130	\$5,680,057	\$1,282,927
56 - DEBT OTHR FINANCING	\$499,600	\$489,165	-\$10,436
57 - INTER DEPART CHARGES	\$920,471	\$1,023,388	\$102,917
58 - INTER DEPART BILLING	-\$704,216	-\$810,405	-\$106,189
59 - TRANSFER OUT	\$893,424	\$966,172	\$72,748

2024 Operating Budget Service Budget Proposal Form

Instructions: Complete one form per Service. When saving the file, add the Agency and Service name to the file name. Submit by saving a copy of the proposal form in you F:/Common Drive Folder.

Part 1. Identifying Information				
Select your Agency:	CDA HOUSING OPERATIONS			
Enter your Service:	Housing Vouchers			
Review the "Service Description" in the 2023 Adopted Budget. Do you have any updates?				
□No – No change to description				
⊠Yes – Description needs to be updated				
If yes, enter updated Service Description here:				

This service provides Section 8 Housing Vouchers across the City of Madison. The housing vouchers provide rental assistance to fill the gap between what low-income tenants can afford to pay and the actual cost of decent, safe, and sanitary housing. The voucher program serves households with incomes below the area median income: priority is given to the elderly, disabled, families with minor children, chronically homeless veterans, and other targeted groups. The number of housholds receiving Section 8 housing varies based on the area's market rate rent and HUD's available funding. It has been averaging upwards of 1900 households. The goal of this service is to provide individuals and families who are at risk of becoming homeless or are currently rent burdened afford stable housing.

Review the "Activities Performed by Service" in the <u>2023 Adopted Budget</u>. Do you have any updates? \square No – No change to activities

 \Box Yes – Activities need to be updated

If yes, enter updated Activities Performed by Service here: Click or tap here to enter text.

Part 2. Base Budget Proposal: Significant Changes (\$10,000 or more)

Agencies can propose net neutral reallocations within their budget, but must explain changes of \$10,000 or more at the **Service and/or Major level**.

Examples of changes that **do** need to be detailed:

- Moving \$10,000+ within a Service from one Major to another Major
- Moving \$10,000+ within a Major from one Service to another Service

Examples of changes that **do not** need to be detailed:

- Total changes of less than \$10,000 at the Major and Service level.
- Object level changes do not need additional justification if the net change to the Major is less than \$10,000. For example, if you propose moving \$15,000 from Consulting to Software

within the Purchased Services Major, you do not need to detail the change if it is within the same Service.

If your proposed changes are a technical correction to your base budget, you can simply state that the change is a correction/ adjustment in the narrative questions below.

Summary Table of *Service and/or Major* Changes of \$10,000 or More

Complete the table below to detail changes at the Service and/or Major level and answer the narrative questions to describe your changes. **If you have no significant changes, skip this section**

Fund	Major	\$ Change	Description
5100 - CDA	51 - SALARIES	\$90,895	Increase due to the addition of the Client Services Manager Position as part of the pre-approved reorganization
5100 - CDA	52 - BENEFITS	0	Click or tap here to enter text.
5100 - CDA	54 - PURCHASED SERVICES	\$1,704,423	Increase due to increase in Federal funding of the Section 8 voucher program
5100 - CDA	53 - SUPPLIES	-\$13,347	Decrease due to large software and furniture purchases being completed in 2023
5100 - CDA	42 - INTERGOV REVENUES	\$1,933,463	Increase due to increase in Federal funding of the Section 8 voucher program
5100 - CDA	46 - INVEST OTHER CONTRIB	\$16,000	Increase due to increase in interest revenue as interest rates have rebound
Select	Select	Enter \$.	Click or tap here to enter text.
Select	Select	Enter \$.	Click or tap here to enter text.
Select	Select	Enter \$.	Click or tap here to enter text.
Select	Select	Enter \$.	Click or tap here to enter text.

Explain the impact of your proposed change(s). Will there be a change to current activities or service levels? Why is this change needed in the 2024 budget?

The change is required as Federal funding has been increased and the services rendered by the Section 8 program will serve more households.

Explain how your proposed change(s) will align with your draft 2023-2024 Department Equity Action Plan. Will the change(s) address specific inequities or advance other equity goals? Is the change related to a Neighborhood Resource Team (NRT) recommendation? Be as specific as possible.

As recognized by the Imagine Madison Plan, local leaders, and NRTs alike, the lack of affordable housing in Madison creates an inherent inequity among citizens. As part of the national solution to the accessibility of housing to all socioeconomic classes Section 8 vouchers are a critical component. The 2024 budget reflects the CDA's needed capacity changes to best bring additional affordability through this vehicle to Madison.

Part 3. Supplemental Requests

Agencies may submit up to one (1) supplemental request to address citywide priorities or urgent needs. Before submitting a supplemental request, agencies should first examine whether they can address their needs through reallocations within the base budget or by implementing operational efficiencies. **If you are not submitting a supplemental request, skip this section.**

Describe your supplemental proposal. What citywide priority or urgent need does the proposal address? What data informed your proposal?

Click or tap here to enter text.

Estimated Costs:

- Personnel: \$Click or tap here to enter text.
- Non-Personnel: \$Click or tap here to enter text.
- Explain the assumptions you used to estimate costs: Click or tap here to enter text.

What efforts have you taken to reallocate resources, identify process improvements, or implement other operational efficiencies prior to submitting this request?

Click or tap here to enter text.

If funded, what performance measures will you track to determine whether the additional funding is meeting the stated goals?

Click or tap here to enter text.

Explain how your proposed change(s) will align with your draft 2023-2024 Department Equity Action Plan. Will the change(s) address specific inequities or advance other equity goals? Is the change related to a Neighborhood Resource Team (NRT) recommendation? Be as specific as possible.

Click or tap here to enter text.

Part 4. Personnel Changes

All proposed personnel change must be submitted for review, even if the change is net neutral. Agencies should contact their HR Analyst to discuss proposed changes prior to submitting their request. Any proposal that adds a completely new position (i.e. a position that does not have an existing classification) must include a draft job description.

If the proposed personnel changes require supplemental funding, be sure to complete "Part 3. Supplemental Request" above. **If you are not submitting personnel changes, skip this section.**

Allocation Changes: Does your proposal change the position allocations of existing positions?

 \Box No – No allocation changes

 \boxtimes Yes – Includes proposed allocation changes

If yes, complete the "Position Allocation Change Form" and submit as part of your proposal.

Reclassifications: Does your proposal reclassify existing positions?

 \Box No – No reclassifications

 \boxtimes Yes – Includes proposed reclassifications

If yes, provide the position number and briefly describe the change:

Position #1004 – Potential reclassification as part of an in process career laddering proposal. Position # 1033 – Potential reclassification currently being studied per HR request

of FTEs: Does your proposal change the total number of FTE positions for an existing classification? ⊠No – No change to # of FTEs

□Yes – Includes proposed change to # of FTEs

If yes, provide the position classification and briefly describe the change: Click or tap here to enter text.

New Positions: Does your proposal create a new position? (i.e. position with no existing classification) \Box No – No new positions

 \boxtimes Yes – Includes proposed new positions

If yes, submit a draft position description with your proposal and briefly describe the change here: Creation of Client Services Manager – expected to be hired by early 2024 as part of the approved reorganization.

Explain the impact of your proposed personnel change(s). Will there be a change to current activities or service levels? Why is this change needed in the 2024 budget?

This position will create capacity for program creation, evaluation, and monitoring as well as creating & strengthening community-based programmatic partnerships. Additionally, this position will help reduce household waitlist times, provide additional capacity in order to respond to increases in the Federal program funding, and case management support.

Explain how your proposed personnel change(s) will align with your draft Department Equity Action Plan. Will the change(s) address specific inequities or advance other equity goals?

As recognized by the Imagine Madison Plan, local leaders, and NRTs alike, the lack of affordable housing in Madison creates an inherent inequity among citizens. As part of the national solution to the accessibility of housing to all socioeconomic classes Section 8 vouchers are a critical component. The 2024 budget reflects the CDA's needed capacity changes to best bring additional affordability through this vehicle to Madison.

2024 Operating Budget Service Budget Proposal Form

Instructions: Complete one form per Service. When saving the file, add the Agency and Service name to the file name. Submit by saving a copy of the proposal form in you F:/Common Drive Folder.

Part 1. Identifying Information				
Select your Agency:	CDA HOUSING OPERATIONS			
Enter your Service:	Public Housing			
Review the "Service Description" in the <u>2023 Adopted Budget</u> . Do you have any updates? No – No change to description Yes – Description needs to be updated				
If yes, enter updated Service Description here:				
Click or tap here to enter text.				
Review the "Activities Performed by Service" in the 2023 Adopted Budget. Do you have any updates?				
⊠No – No change to activities				
\Box Yes – Activities need to be updated				
If yes, enter updated Activities Performed by Service here:				
Click or tap here to enter text.				

Part 2. Base Budget Proposal: Significant Changes (\$10,000 or more)

Agencies can propose net neutral reallocations within their budget, but must explain changes of \$10,000 or more at the **Service and/or Major level**.

Examples of changes that **do** need to be detailed:

- Moving \$10,000+ within a Service from one Major to another Major
- Moving \$10,000+ within a Major from one Service to another Service

Examples of changes that **do not** need to be detailed:

- Total changes of less than \$10,000 at the Major and Service level.
- Object level changes do not need additional justification if the net change to the Major is less than \$10,000. For example, if you propose moving \$15,000 from Consulting to Software within the Purchased Services Major, you do not need to detail the change if it is within the same Service.

If your proposed changes are a technical correction to your base budget, you can simply state that the change is a correction/ adjustment in the narrative questions below.

Summary Table of Service and/or Major Changes of \$10,000 or More

Complete the table below to detail changes at the Service and/or Major level and answer the narrative questions to describe your changes. **If you have no significant changes, skip this section**

Fund	Major	\$ Change	Description
5100 - CDA	51 - SALARIES	-\$129,316	Decrease due to the addition of the Client Services Manager Position as part of the pre-approved reorganization & 4 Maintenance position reclassifications as part of pre-approved career laddering. Offset by technical error allocating two other agencies' positions to the CDA Housing salary major.
5100 - CDA	52 - BENEFITS	0	Click or tap here to enter text.
5100 - CDA	54 - PURCHASED SERVICES	\$1,282,927	Increase due to significant increases in utilities, property insurance, property taxes, construction rates, and contractual increases (landscaping, security, waste disposal) as well as the incorporation of \$1million of reserve usage for the Triangle/Karabis/Parkside Redevelopment
5100 - CDA	53 - SUPPLIES	\$24,975	Increase due to replacement purchase of box truck in 2024
5100 - CDA	57 - INTER DEPART CHARGES	\$102,917	Increase due to HUD-approved increase in Management & Bookkeeping Fees from the properties to the COCC
5100 - CDA	58 - INTER DEPART BILLING	\$106,189	Increases due to the HUD-approved increase in Management & Bookkeeping Fees from the properties to the COCC
5100 - CDA	56 - DEBT OTHR FINANCING	-\$10,436	Decrease in needed AMP support from the COCC
5100 - CDA	42 - INTERGOV REVENUES	\$940,941	Increase due to HUD's increase in the Operational Subsidy & Capital Fund grants
5100 - CDA	43 - CHARGES FOR SERVICES	-\$175,306	Decrease due to experience of higher delinquent rent in recent years
5100 - CDA	47 - MISC REVENUE	\$11,676	Increase due to increase in interest revenue
5100 - CDA	48 - OTHER FINANCE SOURCE	\$207,569	Increase due to incorporation of reserve usage for the Triangle/Parkside/Karabis redevelopment
5100 - CDA	49 - TRANSFER IN	\$56,701	Increase in HUD's Capital Grant Award

5100 - CDA	59 - TRANSFER OUT	\$72,748	Increase due to increase in HUD's Capital Fund Grant
Select	Select	Enter \$.	Click or tap here to enter text.
Select	Select	Enter \$.	Click or tap here to enter text.
Select	Select	Enter \$.	Click or tap here to enter text.

Explain the impact of your proposed change(s). Will there be a change to current activities or service levels? Why is this change needed in the 2024 budget?

Changes are needed due to market changes in order to continue current services.

Explain how your proposed change(s) will align with your draft 2023-2024 Department Equity Action Plan. Will the change(s) address specific inequities or advance other equity goals? Is the change related to a Neighborhood Resource Team (NRT) recommendation? Be as specific as possible.

As recognized by the Imagine Madison Plan, local leaders, and NRTs alike, the lack of affordable housing in Madison creates an inherent inequity among citizens. As part of the national solution to the accessibility of housing to all socioeconomic classes Public Housing are a critical component. The 2024 budget reflects the CDA's needed capacity changes to respond to the current market increases to allow property management to continue to operate safe, sanity, and decent public housing per HUD's guidelines.

Part 3. Supplemental Requests

Agencies may submit up to one (1) supplemental request to address citywide priorities or urgent needs. Before submitting a supplemental request, agencies should first examine whether they can address their needs through reallocations within the base budget or by implementing operational efficiencies. **If you are not submitting a supplemental request, skip this section.**

Describe your supplemental proposal. What citywide priority or urgent need does the proposal address? What data informed your proposal?

Click or tap here to enter text.

Estimated Costs:

- Personnel: \$Click or tap here to enter text.
- Non-Personnel: \$Click or tap here to enter text.
- Explain the assumptions you used to estimate costs: Click or tap here to enter text.

What efforts have you taken to reallocate resources, identify process improvements, or implement other operational efficiencies prior to submitting this request?

Click or tap here to enter text.

If funded, what performance measures will you track to determine whether the additional funding is meeting the stated goals?

Click or tap here to enter text.

Explain how your proposed change(s) will align with your draft 2023-2024 Department Equity Action Plan. Will the change(s) address specific inequities or advance other equity goals? Is the change related to a Neighborhood Resource Team (NRT) recommendation? Be as specific as possible.

Click or tap here to enter text.

Part 4. Personnel Changes

All proposed personnel change must be submitted for review, even if the change is net neutral. Agencies should contact their HR Analyst to discuss proposed changes prior to submitting their request. Any proposal that adds a completely new position (i.e. a position that does not have an existing classification) must include a draft job description.

If the proposed personnel changes require supplemental funding, be sure to complete "Part 3. Supplemental Request" above. If you are not submitting personnel changes, skip this section.

Allocation Changes: Does your proposal change the position allocations of existing positions?

□ No – No allocation changes

⊠Yes – Includes proposed allocation changes

If yes, complete the "Position Allocation Change Form" and submit as part of your proposal.

Reclassifications: Does your proposal reclassify existing positions?

 \Box No – No reclassifications

⊠Yes – Includes proposed reclassifications

If yes, provide the position number and briefly describe the change:

Position #1000 – Potential reclassification as part of an approved career laddering program Position #1041 - Potential reclassification as part of an approved career laddering program Position #1052 - Potential reclassification as part of an approved career laddering program Position #3933 - Potential reclassification as part of an approved career laddering program Position # 1033 – Potential reclassification currently being studied per HR request Position #4765 – Potential reclassification preparing for submission

Position #1027 – Potential reclassification as part of approved reorganization

of FTEs: Does your proposal change the total number of FTE positions for an existing classification? \boxtimes No – No change to # of FTEs

□ Yes – Includes proposed change to # of FTEs

If yes, provide the position classification and briefly describe the change: Click or tap here to enter text.

New Positions: Does your proposal create a new position? (i.e. position with no existing classification) \Box No – No new positions

 \boxtimes Yes – Includes proposed new positions

If yes, submit a draft position description with your proposal and briefly describe the change here: Creation of Client Services Manager - expected to be hired by early 2024 as part of the approved reorganization.

Explain the impact of your proposed personnel change(s). Will there be a change to current activities or service levels? Why is this change needed in the 2024 budget?

Client Service Manager position will decrease the time of application approval as well as create increased capacity of other staff members through naturally created operational efficiencies. Maintenance reclassifications will increase internal maintenance abilities to reduce external contractor costs.

Explain how your proposed personnel change(s) will align with your draft Department Equity Action Plan. Will the change(s) address specific inequities or advance other equity goals?

As recognized by the Imagine Madison Plan, local leaders, and NRTs alike, the lack of affordable housing in Madison creates an inherent inequity among citizens. As part of the national solution to the accessibility of housing to all socioeconomic classes Public Housing are a critical component. The 2024 budget reflects the CDA's needed capacity changes to respond to the current market increases to allow property management to continue to operate safe, sanity, and decent public housing per HUD's guidelines.