

FY2020 MOVING TO WORK ANNUAL PLAN



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Section One **INTRODUCTION**



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Section I: Introduction

Overview of CHA's MTW Goals and Objectives

Since 2000, CHA has been engaged in achieving the goals of the original Plan for Transformation: rehabilitate or redevelop 25,000 housing units in Chicago; reintegrate low-income families and housing into the larger physical, social and economic fabric of the city; provide opportunities and services to help residents improve their lives; and spur the revitalization of communities once dominated by CHA developments. CHA and HUD signed the original Moving To Work (MTW) Agreement on February 6, 2000 which allowed CHA to implement the original Plan for Transformation. CHA's Amended and Restated MTW Agreement with HUD was fully executed on June 26, 2008. All MTW Agreements were subsequently extended until 2028 pursuant to Congressional action.

CHA continues to pursue the three statutory objectives of the MTW Demonstration Program through a variety of innovative program initiatives:

- **MTW Statutory Objective I:** Increase housing choices for low-income families.
- **MTW Statutory Objective II:** Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
- **MTW Statutory Objective III:** Reduce costs and achieve greater cost effectiveness in federal expenditures.

As part of the MTW Agreement, CHA must submit an annual plan to HUD no later than 75 days prior to the start of the fiscal year. In February 2018, HUD issued a revised Form 50900 (Attachment B to the MTW Agreement) which outlines requirements for the content of MTW annual plans/reports and for tracking the impact of MTW activities. CHA continues to work with HUD for technical guidance and feedback on MTW reporting processes and requirements to ensure compliance.

Key CHA Initiatives

CHA Unit Delivery Strategy and Progress toward Goal of 25,000 Housing Units

CHA continues to pursue a variety of unit delivery strategies to achieve the original Plan for Transformation goal of rehabilitating or replacing 25,000 units of affordable housing in Chicago and to fulfill the obligations of CHA's MTW Agreement with HUD.

- ***Mixed-Income Redevelopment:*** CHA will continue with new on- and off-site phases in mixed-income developments which have replaced many former CHA properties.
- ***Real Estate Acquisition Program (REAP):*** CHA will continue its strategy to acquire Public Housing units primarily in Opportunity Areas.
- ***Property Rental Assistance (PRA) Program:*** CHA will continue to expand the existing PRA program to provide new project-based voucher units through multi-year contracts with private owners and developers.
- ***Conversion of Moderate Rehabilitation Properties:*** CHA will continue to work with private owners of existing CHA Moderate Rehabilitation program properties to identify opportunities to transition these properties to the PRA Program through RAD2 conversion or the standard project-based voucher selection process.
- ***Other Initiatives:*** CHA continues to explore new unit delivery strategies to respond to local housing preferences and market opportunities.

During FY2020, CHA plans to deliver an additional 343 housing units, including 31 Public Housing units and 314 PBV units, that will be counted toward the 25,000 unit delivery goal. *(Please refer to Section II and IV for more information.)*

PROJECTED FY2020 UNIT DELIVERY				
IL Number	Type	Program	Development Name	Projected Number of Units
TBD	Public Housing	Mixed-Income Housing Redevelopment	4400 Grove	21
TBD	Public Housing	Real Estate Acquisition Program (REAP)	1221 W. Sherwin	10
N/A	Project-Based Vouchers	Property Rental Assistance (PRA)	Butler Lindon Apartments	23
			Humboldt Park Residence	8
			Mark Twain Apartments	148
			Montclare Senior Residences of Calumet Heights	34
			Sarah's on Sheridan	18
			Warren Apartments	25
N/A	Project-Based Vouchers*	RAD1 PBV	Southbridge	34
			Parkside 4 Phase 2	22
TOTAL				343

*This table does not include all RAD 1 units expected to be under HAP in FY2020; it only includes new units (not previously counted) that are expected to be completed and available for occupancy in FY2020.

Rental Assistance Demonstration (RAD) Program

In October 2013, CHA submitted a portfolio application to HUD to utilize RAD to provide a more consistent budgeting platform to support long-term operation and affordability of CHA Public Housing units. CHA elected to transition the proposed Public Housing units to the Project-Based Voucher (PBV) program. In anticipation of a potential future RAD award, CHA proceeded with required revisions to the annual plan through an amendment to the FY2014 MTW Annual Plan. In FY2014, CHA updated the HCV Administrative Plan to reflect RAD-specific policies, as well as created a RAD lease/lease addendum and RAD grievance policy. These RAD policies were released for public comment in November 2014 and approved by CHA's Board in January 2015. As reflected in these policies, CHA will adhere to the requirements of the RAD program and PBV regulations, including the incorporation of key Public Housing provisions that protect residents' interests and encourage resident participation and self-sufficiency. In June 2015, CHA received a RAD award for its portfolio application. Since then, CHA has closed multiple transactions with more than 4,000 units converted to PBV under the RAD program.

In FY2020, CHA will continue to move forward with RAD PBV conversions for the remaining portfolio award. *(Please refer to Section II and the Appendix for more information about CHA's RAD program.)*

Proposed New MTW Activities in FY2020

In FY2020, CHA is requesting HUD approval for significant changes to two previously approved MTW activities.

Public Housing and Housing Choice Voucher

- ***Choose to Own (CTO) Homeownership Program for Public Housing and HCV (2011-01)***: In FY2017, CHA's HCV Program received HUD approval to remove calculation of assets upon recertification of participants. Currently, at year ten, participants of CHA's CTO program are required to calculate equity in the home as part of an asset. Based on the previously approved HCV MTW activity, this

amount is being zeroed out, but only after CHA goes through the process of calculation. Therefore, CHA would like to modify the CTO activity to waive the calculation of equity asset as a way of seeking administrative efficiency.

Housing Choice Voucher Program

- ***Incentive Payments for Landlords in CHA Mobility Areas (2017- 02)***: CHA proposes limiting the Landlord Incentive Payment to only those new owners to the HCV program who lease new units in Mobility Areas. Based on available data, CHA anticipates spending approximately \$450,000 annually on this activity if this modification is approved.

Approved MTW Activities in FY2020

In FY2020, CHA will continue or proceed with implementation of the following approved MTW activities to provide more housing options for families, assist residents in achieving self-sufficiency, and increase the cost-effectiveness of public housing and HCV program administration.

Housing/Development

- ***Revitalization of 25,000 Housing Units (2000-01)***: CHA continues to make progress toward the goal of 25,000 housing units and providing additional housing opportunities for residents.
- ***Alternative Reasonable Cost Formula for Redevelopment and Rehabilitation (2010-01)***: CHA is authorized to utilize an alternate reasonable cost formula for both redevelopment and rehabilitation projects.
- ***Expedited Public Housing Acquisition Process (2015-01)***: CHA is authorized to use MTW flexibility to support CHA's Real Estate Acquisition Program and expedite the acquisition of units and/or buildings as Public Housing units.

Public Housing and Housing Choice Voucher Programs

- ***\$75 Minimum Rent for Public Housing and HCV Programs (2009-01)***: CHA increased the minimum rent from \$50 to \$75 in FY2009 in PH and HCV programs.
- ***Modified Family Self-Sufficiency (FSS) Program for HCV and Public Housing (2014-01)***: CHA is proposing the following modifications to the FSS program: (1) to allow household members other than the head of household to enroll in the program; and (2) remove interest earned from participant escrow to create a grant fund.
- ***Triennial Re-examinations for Households with Only Elderly/Disabled Participants for HCV and Public Housing (2014-02)***: In FY2014, CHA received HUD approval to implement a streamlined triennial re-examination schedule for PH and HCV fixed income households consisting of only disabled and/or elderly participants.
- ***CHA Re-entry Pilot Program (2014-04)***: CHA has implemented a Re-entry Pilot Program for up to 50 eligible participants who are reuniting with a family member currently living in CHA PH or CHA's HCV Program or for eligible participants currently on a CHA wait list.
- ***Mobility Counseling Demonstration Program Work Requirement (2016-01)***: CHA has implemented a work requirement for applicants who consent to participation in the Mobility Counseling Demonstration Program and move to either a CHA Opportunity or Gautreaux-designated General Area utilizing a tenant-based HCV.

- ***Biennial Re-examinations for Public Housing and HCV (2014-03) and (2006-01):*** CHA implemented biennial re-examinations for PH households in FY2017 and will continue to conduct biennial re-examinations for HCV households.

Public Housing

- ***Public Housing Work Requirement (2009-02):*** Through the implementation of a work requirement across CHA's PH portfolio, more residents are engaged in employment, education, job training, and community service in order to achieve goals for self-sufficiency. CHA provides case management and workforce development resources to residents to assist them in fulfilling this requirement.
- ***Office of the Ombudsman (2008-01):*** The Office of the Ombudsman provides designated staff to address the concerns of PH residents living in mixed-income communities and serves as a liaison between residents and CHA leadership. The office assists residents in resolving issues and adapting to new communities.

Housing Choice Voucher Program

- ***Modified Exception Payment Standards/Altering Mobility Area Map (2010-02):*** CHA is authorized to implement exception payment standards (EPS) that exceed the standard limit of 110% of HUD's published Fair Market Rents (FMRs) for the City of Chicago. CHA also has approval for 250% FMR in cases where it's needed as a reasonable accommodation; to also add the location of the unit to criteria that can be considered to go up to 250% for a reasonable accommodation; and to use the Mobility Area map to determine areas eligible for EPS.
- ***HCV Vacancy Payments (2011-03):*** CHA may provide a modest vacancy payment to participating owners who re-lease an eligible unit currently in the HCV program to another HCV participant.
- ***Elimination of Assets in Income Calculation after Initial Eligibility for HCV Program (2017- 01):*** CHA reinstated this activity in FY2017 and for FY2019, received approval to disregard all assets under \$50,000.
- ***Increased Payment Standards at Interims (2018-01):*** CHA has implemented an activity to increase payment standards at Interims for elderly/disabled households and others who receive a rent increase.
- ***Income Calculation Hardship Exemption:*** In FY2018, CHA received approval to implement a hardship exemption for heads of households who are making required child support payments that hinder their ability to pay their monthly rent portion. CHA is now seeking to expand this exemption to all working adult household members.

Property Rental Assistance Program/Project-Based Vouchers

- ***Exceed the Limit of 25% Project-Based Voucher (PBV) Assistance in Family Properties (2008-02):*** CHA may increase the percent of assisted PBV units in certain projects above the regulatory limit of 25% per family building.
- ***PBV Contract Commitments with 21-30 Year Initial Terms with Extension Option (2011-05):*** CHA has received MTW authority to enter into initial PBV contracts of 21-30 years or an aggregate term not to exceed 40 years with an extension.

- ***Acceptance of City Certificates of Occupancy for Initial PRA Inspections (2011-06):*** CHA is authorized to accept the issuance of a Certificate of Occupancy by the City of Chicago as evidence of the property's compliance with Housing Quality Standards for initial PRA inspections.
- ***Payments during Initial Occupancy/Leasing – New Construction and Substantially Rehabilitated Properties (2011-08):*** CHA provides vacancy payments, as determined necessary on a project-by-project basis, during the initial operating lease-up period in order to provide an incentive for owner participation and to ensure the long-term viability of newly constructed and substantially-rehabilitated properties.
- ***Single HAP for Non-Contiguous PBV Properties with Same Owner (2019-01):*** CHA now uses a single Housing Assistance Payment (HAP) contract for PBV units under the same ownership entity and located in buildings of 4 or more units that are not contiguous.
- ***Expansion of Public Housing Earned Income Disallowance Policy to CHA PBV Properties within the RAD Program (2016-03):*** CHA has retained the PH EID policy for residents in properties transitioning to RAD PBV.
- ***Uniform Physical Conditions Standards (UPCS) Inspection Standards for PBV Properties within the RAD Program (2016-04):*** CHA has continued to utilize UPSC for inspections in properties transitioning to RAD PBV.
- ***Adjusting Fair Market Rent (FMR) Thresholds to Retain Existing Subsidy Levels for Select PBV Properties (2016-05):*** CHA may exceed the FMR cap of 110% for RAD PBV properties, as needed, to retain existing subsidy levels.

Local Programs

- ***Funding for City of Chicago Housing Assistance Programs (2017-04):*** CHA is implementing program-based assistance to help families access housing and remain stably housed. Social services will be linked to the housing assistance to ensure that families achieve stability.

Activities On Hold

- ***Owner Excellence - Acceptance of Passed Annual or Initial HQS Inspection for New Request for Tenancy Approval (RTA) within 90 Days of Passed Date (2011-02):*** CHA is authorized to approve tenancy for a unit that passed inspection within the previous 90 calendar days without conducting a new inspection for each RTA received. Due to the administrative challenge of establishing a mechanism to identify units eligible and ensure compliance CHA will close this activity in the FY2019 MTW Annual Report.

Closed Out Activities

- ***Time Limit Demonstration Program for Housing Choice Voucher Participants (2017- 03):*** CHA was authorized to implement an eight-year time limit demonstration program for a total of 100 families. This activity was placed on hold in the FY2018 MTW Annual Plan and closed out in the FY2018 MTW Annual Report.

Finally, in FY2020, CHA will continue to utilize the single fund budget provided through MTW participation for expanded and flexible resources for overall administration of housing assistance, capital and redevelopment activities, and services and programs for residents. *(Please refer to Section V for more info.)*

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Section Two **GENERAL HOUSING AUTHORITY OPERATING INFORMATION**



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Section II: General Operating Information

This section contains General Housing Authority Operating Information for CHA's Public Housing (PH) portfolio and Housing Choice Voucher (HCV) program, including housing stock, leasing, and wait list information.

Section IIA: Housing Stock Information

i. *Planned New Public Housing Units in FY2020*

Planned New Public Housing Units to be Added During FY2020											
Amp Name and Number	Bedroom Size							Total Units	Population Type	# of Uniform Federal Accessibility Standards (UFAS) Units	
	0	1	2	3	4	5	6+			Fully Accessible	Adaptable
4400 Grove	0	8	11	2	0	0	0	21	General	2	4
1221 W. Sherwin	0	10	0	0	0	0	0	10	General	1	2

Total Public Housing Units to be Added 31

Overview of New Public Housing Units in FY2020

- **4400 Grove** (IL to be assigned): This former site of some of CHA's Washington Park units is being redeveloped into a mixed-income community. CHA's development partner closed and started construction in December 2018 on a new mixed-use/mixed-income development at 4424-34 S. Cottage Grove. The development will include first floor retail with 84 new housing units above for the following mix of tenants: 21 PH, 38 other affordable, and 25 market rate families. Of the 21 PH units projected for FY2020 delivery, 2 will be accessible and 4 will be adaptable.
- **1221 W. Sherwin** (IL to be assigned): CHA expects to acquire a 57-unit building and, as units become vacant, will re-lease them as PH. We anticipate approximately 10 units in 2020.

ii. *Planned Public Housing Units to be Removed in FY2020*

Dwelling Demolition

PLANNED PUBLIC HOUSING UNITS TO BE REMOVED*		
AMP Name and Number	Number of Units to be Removed	Explanation for Removal
Lathrop Homes/ IL002022000	86	Units being demolished due to structural deficiencies: 2890 N. Clybourn, 10 units 2902 N. Clybourn, 9 units 2900 N. Clybourn, 14 units 2904 N. Clybourn, 10 units 2748 N. Hoyne, 10 units 2746 N. Hoyne, 14 units 2744 N. Hoyne, 9 units 2742 N. Hoyne, 10 units

Scattered Sites Region 1/ IL002032000	5	Units being demolished due to structural deficiencies 2507 N. Avers, 1 unit 1618 N. Albany, 1 unit 1718 N. Maplewood, 1 unit 1620 N. St. Louis, 1 unit 1629 N. Washtenaw, 1 unit
Scattered Sites Region 2/ IL002035000	26	Units being demolished due to structural deficiencies 1312 S. Harding, 6 units 1314 S. Harding, 6 units 1316 S. Harding, 6 units 1309 S. Independence, 6 units 625 N. Springfield, 1 unit 849 N. St. Louis, 1 unit
Scattered Sites Region 4/ IL002034000	34	Units being demolished due to structural deficiencies 7614 S. Coles, 1 unit 8546 S. Mackinaw, 2 units 10050 S. Calhoun, 1 unit 7713 S. Coles, 2 units 10527 S. Corliss, 2 units 4520 S. Leamington, 1 unit 6236 S. Loomis, 1 unit 12440 S. Parnell, 1 unit 12834 S. Peoria, 1 unit 1018 W. Vermont, 1 unit 2920 E. 91 st St, 3 units 8446 S. Buffalo, 2 units 5341 S. Campbell, 1 unit 4434 S. Hermitage, 1 unit 4512 S. Hermitage, 1 unit 4457 S. Keating, 1 unit 4558 S. Paulina, 1 unit 4401 S. Talman, 2 units 4302 S. Wood, 1 unit 2249 W. 54 th Place, 1 unit 2251 W. 54 th Place, 1 unit 5433 S. Claremont, 3 units 547 W. 116 th St, 1 unit 5724 S. Wood, 1 unit

Total Number of Units to be Removed

151

*Other demolition activity previously proposed in annual plans may be carried out in FY2020.

Non-Dwelling Demolition

CHA is not planning any non-dwelling demolitions in FY2020.

IL Number	Development	Non-Dwelling Address	Justification for Non-Dwelling Demolition
N/A			

iii. Planned New Project-Based Vouchers in FY2020

CHA has continued to expand the use of project-based vouchers (PBVs) to increase housing options for low-income families in the region. PBVs are issued directly to property owners unlike tenant-based vouchers. The following tables provide an overview of the 1,966 new PBVs planned to be under PRA/RAD1 HAP in FY2020, including 1,831 conversions of PH units to RAD 1 PBVs and 135 new PBV units through PRA.

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	PLANNED STATUS AT END OF PLAN YEAR	RAD?	DESCRIPTION OF PROJECT
RAD/PBV				
Ada S. Dennis McKinley*	124	Leased	Yes	RAD1 in the Woodlawn community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Edith Spurlock Sampson*	386	Leased	Yes	RAD1 in the Lincoln Park community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Elizabeth Wood*	82	Leased	Yes	RAD1 in the Lincoln Park community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Ella Flagg Young*	235	Leased	Yes	RAD1 in the Uptown community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Hilliard Senior 1*	94	Leased	Yes	RAD1 in the Near South Side community area for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Hilliard Senior 2*	59			RAD1 in the Near South Side community area for families & individuals; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Lathrop Phase 1B	77	Committed	Yes	RAD1 in the Lincoln Park/North Center communities for families & individuals.
Mahalia Jackson*	282	Leased	Yes	RAD1 in the South Chicago community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Margaret Day Blake*	98	Leased	Yes	RAD1 in the Lincoln Park community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Maria Diaz Martinez*	133	Leased	Yes	RAD1 in the Lincoln Park community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Mary Jane Richardson*	170	Leased	Yes	RAD1 in the Grand Boulevard community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Maudelle Brown Bousfield*	91	Leased	Yes	RAD1 in the Kenwood community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
TOTAL	1,831			

PRA/PBV				
5150 Northwest Hwy Apartments	30	Committed	No	PRA/PBV located in the Jefferson Park community, for families and individuals. 90 total units of new construction; AHAP executed for 30 units.
Sarah's on Sheridan	18	Committed	No	PRA/PBV located in the Uptown community, supportive housing for homeless women. 38 total units of new construction; AHAP executed for 18 units.
North Park Village Apartments	81	Committed	No	PRA/PBV located in the North Park community, for seniors age 62+. 180 units of existing housing; AHAP executed for 81 units.
Paseo Boricua Arts Building	6	Committed	No	PRA/PBV located in the West Town community, for families and individuals. 24 units of new construction housing; AHAP executed for 6 units.
TOTAL	135			

*former PH units converted to RAD PBVs

iv. Planned Existing Project-Based Vouchers

CHA will administer 10,063 PBVs, including 5,317 former PH units converted to RAD1 PBVs.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR	RAD?	DESCRIPTION OF PROJECT
RAD / PBV				
4501 N. Winchester	74	Committed	Yes	Lathrop Homes transfer of assistance (Lathrop MP2)
Caroline Hedger*	450	Leased	Yes	RAD1 in the Rogers Park community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Concord at Sheridan	65	Committed	Yes	RAD1 in the Rogers Park community, for families & individuals. Lathrop Homes transfer of assistance.
Daniel H Burnham*	178	Leased	Yes	RAD1 in the West Ridge community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Devon Place Apartments	33	Leased	Yes	Lathrop Homes transfer of assistance
Diversey Manor	45	Committed	Yes	RAD1 in the Belmont Cragin community, for families & individuals. Lathrop Homes transfer of assistance.
Elizabeth Davis Apartments*	148	Leased	Yes	RAD1 in the Humboldt Park community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Fannie Emanuel*	180	Leased	Yes	RAD1 in the West Garfield Park community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Hattie Callner Apartments*	145	Leased	Yes	RAD1 in the Lakeview community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Ickes Phase 1A	34	Committed	Yes	Altgeld transfer of assistance
Ickes Phase 1B	34	Committed	Yes	Altgeld transfer of assistance

Independence Apartments	30	Committed	Yes	RAD1 new construction mixed-use development at 4022 N Elston Ave in the Irving Park community. The development offers a first-floor public library with approximately 44 new senior 62+ housing units: 30 RAD/PBV and 14 affordable units. Lathrop Homes transfer of assistance. (Lathrop MP5)
John Pennycuff	47	Committed	Yes	RAD1 in the Logan Square community, for families & individuals; Lathrop Homes transfer of assistance.
Judge Fisher Apartments*	199	Leased	Yes	RAD1 in Edgewater community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Judge Green Apts	153	Leased	Yes	RAD1 in the Oakland community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Judge Slater*	402	Leased	Yes	RAD1 in the Grand Boulevard community, for seniors 55+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Kenneth Campbell Apartments*	165	Leased	Yes	RAD1 in the Woodlawn community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Las Americas Apartments*	211	Leased	Yes	RAD1 in the Lower West Side community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Lathrop 1A	151	Leased	Yes	RAD1 in the Lincoln Park/North Center communities for families & individuals.
Lincoln Perry Apartments*	442	Leased	Yes	RAD1 in the Douglas community, for seniors 62+. These are former public housing units converted to RAD1 that will not contribute to new unit delivery.
Long Life Apartments*	114	Leased	Yes	RAD1 in the Armour Square community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Lorraine Hansberry*	168	Leased	Yes	RAD1 in the Austin community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Minnie Riperton*	335	Leased	Yes	RAD1 in the Fuller Park community, for seniors 55+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Northtown Apartments	30	Leased	Yes	RAD1 new construction, mixed-use development at 2410 W Pratt Blvd in the West Ridge community. The development offers a first-floor public library with 44 new senior 62+ housing units above: 30 RAD/PBV and 14 affordable units. Lathrop Homes transfer of assistance. (Lathrop MP6)
Oso Apartments	32	Leased	Yes	RAD1 new construction units in the Albany Park community, for families & individuals. Lathrop Homes transfer of assistance. (Lathrop MP7)
Parkside 4, Phase 2	54	Leased	Yes	Lathrop Homes transfer of assistance (Lathrop MP8)
Patrick Sullivan	480	Leased	Yes	RAD1 in the Near West Side community; former public housing units converted to RAD1 that will not contribute to new unit delivery.

Robert Lawrence Apartments*	191	Leased	Yes	RAD1 in the Englewood community, for seniors 55+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Schneider Apartments*	174	Leased	Yes	RAD1 in the Edgewater community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Villages of Westhaven*	95	Leased	Yes	RAD1 in the Near West Side community, for families & individuals; former public housing units converted to RAD1 that will not contribute toward new unit delivery.
Vivian Carter Apartments*	221	Leased	Yes	RAD1 in the Englewood community, for seniors 55+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
Vivian Gordon Harsh Apartments	123	Leased	Yes	RAD1 in the Oakland community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
William Jones Apartments*	114	Leased	Yes	RAD1 in the Near West Side community, for seniors 62+; former public housing units converted to RAD1 that will not contribute to new unit delivery.
TOTAL	5,317			
PRA/PBV				
3225 W 111th LLC	3	Leased	No	PRA/PBV in the Mount Greenwood community, for disabled individuals.
3714-16 W. Wrightwood Apartments (Data Properties Inc.)	5	Leased	No	PRA/PBV in the Logan Square community, for families & individuals.
5801 S Michigan LLC	23	Leased	No	PRA/PBV in the Washington Park community, for families.
5840 S Dr Martin Luther King Jr Dr	4	Leased	No	PRA/PBV in the Washington Park community, for homeless families & individuals.
600 S Wabash LP	76	Leased	No	PRA/PBV in the Loop community, for homeless individuals.
65th Infantry Regiment Veterans Housing	12	Leased	No	PRA/PBV in the West Town community, for veterans-families.
65th Infantry Regiment Veterans Housing (VASH)	36	Leased	No	PRA/PBV in the West Town community, for VASH-eligible veterans-families.
9000 S Justine LLC	4	Leased	No	PRA/PBV located in the Washington Heights community, for families & individuals.
Access Housing	38	Leased	No	PRA/PBV in the Hermosa, Humboldt Park, Logan Square, and West Town communities, for disabled families & individuals.
Bettendorf Place	18	Leased	No	PRA/PBV in the South Chicago community, for homeless individuals with HIV/AIDS.
Buffett Place	51	Leased	No	PRA/PBV in the Lakeview community, for disabled individuals.
Butler Lindon Apartments	18	Committed	No	PRA/PBV in the Woodlawn community, for homeless individuals. AHAP executed for 18 units.
Deborah's Place II	39	Leased	No	PRA/PBV in the Near North Side community, for homeless female individuals.
Englewood Permanent Supportive Housing	50	Leased	No	PRA/PBV in the Englewood community, for homeless individuals.
Focus Apartments	10	Leased	No	PRA/PBV in the Austin community, for ex-offenders.
Gardenview Apartments	16	Leased	No	PRA/PBV located in Lawndale community, for families living with HIV/AIDS

Harvest Commons Apartments	89	Leased	No	PRA/PBV in the Near West Side community, for homeless individuals.
Hope Manor Apartments I	30	Leased	No	PRA/PBV in the Humboldt Park community, for veterans–Male individuals.
Hope Manor Apartments II	73	Leased	No	PRA/PBV in the Englewood community, for veterans–families & individuals.
Howard Apartments	12	Leased	No	PRA/PBV in the West Town community, for individuals.
Humboldt House	31	Leased	No	PRA/PBV in the Logan Square community, for families & individuals with a Diagnosed Mental Illness.
Humboldt Park Residence	28	Leased	No	PRA/PBV in the Humboldt Park community, for individuals.
Illinois Accessible Housing Initiative	45	Leased	No	PRA/PBV in the Bridgeport, Edgewater, Hyde Park, Lakeview, Near South Side, and New City communities, for disabled families & individuals.
Independence Apartments	9	Leased	No	PRA/PBV located in the North Lawndale community, for families & individuals.
Ironwood Courts	14	Leased	No	PRA/PBV in the Washington Park community, for families.
Jade Garden Apartments	35	Leased	No	PRA/PBV in the Armour Square community, for families.
Jarvis Apartments	4	Leased	No	PRA/PBV located in the Rogers Park community, for families.
Karibuni Place	11	Leased	No	PRA/PBV in the Chatham community, for homeless families & individuals.
Kenmore Plaza	105	Leased	No	PRA/PBV in the Edgewater community, for seniors 62+.
Lake Street Studios	61	Leased	No	PRA/PBV located in the Near West Side community, for individuals.
Lake Village East Apartments	67	Leased	No	PRA/PBV in the Kenwood community, for families & individuals.
Leigh Johnson Courts	18	Leased	No	PRA/PBV in the Greater Grand Crossing community, for families.
Leland Apartments	10	Leased	No	PRA/PBV in the Uptown community, for VASH-eligible individuals. 10 units delivered in FY2018-19; 5 additional units to be delivered in FY2020-21.
Leontyne Apartments	14	Leased	No	PRA/PBV in the Grand Boulevard community, for families & individuals.
Liberty Square Apartments	16	Leased	No	PRA/PBV in the East Garfield Park community, for families & individuals.
LPCS Permanent Supportive Housing	20	Leased	No	PRA/PBV in the Near North Side community, for homeless individuals.
Los Vecinos Apartments	11	Leased	No	PRA/PBV in Humboldt Park community, for homeless individuals.
Luxe Properties	6	Leased	No	PRA/PBV in the East Garfield Park community, for families.
Lyndale Apartments	42	Leased	No	PRA/PBV in the Logan Square community, for families & individuals.
Major Jenkins	80	Leased	No	PRA/PBV in the Uptown community, for homeless individuals.

Maple Pointe Apartments	114	Leased	No	PRA/PBV in the Near North Side community, for families & individuals.
Mark Twain Apartments	148	Leased	No	PRA/PBV in the Near North Side community, for individuals. 148 units of newly rehabbed former SRO property.
Midwest Apartments	20	Leased	No	PRA/PBV in the West Garfield Park community, for individuals. 20 units delivered in FY2018-20; 49 units to be delivered 2021-22.
Milwaukee Avenue Apartments	11	Leased	No	PRA/PBV in the Avondale community, for disabled families.
Montclare Senior Residences of Avalon Park	38	Leased	No	PRA/PBV in the Avalon Park community, for seniors 55+.
Montclare Senior Residences of Calumet Heights	34	Leased	No	PRA/PBV in the Calumet Heights community, for seniors 62+.
Mulvey Place Apartments	19	Leased	No	PRA/PBV in the Lakeview community, for seniors 62+.
Nathalie Salmon House	6	Leased	No	PRA/PBV in the Rogers Park community, for seniors 62+.
Near North Apartments	46	Leased	No	PRA/PBV in the Near North Side community, for individuals.
New Moms Transformation Project	40	Leased	No	PRA/PBV in the Austin community, for Single Mothers (age 18-24) with Children.
North & Talman III	8	Leased	No	PRA/PBV in West Town community, for families & individuals.
Nuestro Hogar	12	Leased	No	PRA/PBV in the Humboldt Park community, for families.
Park Apartments	30	Leased	No	PRA/PBV in the Washington Park community, for families & individuals.
Park Place Towers (IAHI)	5	Leased	No	PRA/PBV in the Lakeview community, for disabled families & individuals.
Phoenix House Apartments	32	Leased	No	PRA/PBV located in Lawndale community, for individuals living with HIV/AIDS
Pierce House	25	Leased	No	PRA/PBV located in the Logan Square community, supportive housing for homeless aged 18-24.
Pullman Artspace Lofts	6	Committed	No	PRA/PBV located in the Pullman community for families, with 38 total units of new construction housing for families. AHAP executed.
Reba Place Fellowship	7	Leased	No	PRA/PBV in the Rogers Park community, for families & individuals.
Renaissance West Apartments	99	Leased	No	PRA/PBV in the Logan Square community, for individuals.
Roosevelt Towers I	126	Leased	No	PRA/PBV in the North Lawndale community, for seniors 62+.
Rosa Parks Apartments	26	Leased	No	PRA/PBV in the Humboldt Park community, for families.
Rosenwald Courts	60	Leased	No	PRA/PBV in the Grand Boulevard community, for seniors 62+.
Roosevelt Road Veterans Studios (VASH)	75	Committed	No	PRA/PBV located in the North Lawndale community, for VASH-eligible individuals. 90 total units of new construction; AHAP executed for 75 VASH units

San Miguel	14	Leased	No	PRA/PBV in the Uptown community, for families & individuals.
Sankofa House	36	Leased	No	PRA/PBV in the North Lawndale community, for families & individuals.
Senior Suites at Auburn Gresham	17	Leased	No	PRA/PBV in the Auburn Gresham community, for seniors 62+.
South Park Plaza	34	Leased	No	PRA/PBV in the Douglas community, for families & individuals.
St. Andrew's Court	30	Leased	No	PRA/PBV in the Near West Side community, for ex-offender graduates of St. Leonard's.
St Edmund's Court	10	Leased	No	PRA/PBV in the Washington Park community, for families.
St Leo Residence	50	Leased	No	PRA/PBV in the Auburn Gresham community, for veterans who are homeless and disabled.
St Leo Residence (VASH)	40	Leased	No	PRA/PBV in the Auburn Gresham community, for veterans who are homeless and disabled.
Sunnyside Kenmore Apartments	10	Leased	No	PRA/PBV in the Uptown community, for families.
The Carling	39	Leased	No	PRA/PBV in the Near North Side community, for individuals.
The Drexel	12	Leased	No	PRA/PBV in the Chatham community, for veterans-families & individuals.
The Marshall	90	Leased	No	PRA/PBV in the Near North Side community, for individuals.
The Resurrection Home	5	Leased	No	PRA/PBV in the Lower West Side/North Lawndale community, for families.
The Suites of Autumn Green at Wright Campus	8	Leased	No	PRA/PBV in the Dunning community, for seniors 55+.
Thresholds at Casa De Troy	16	Leased	No	PRA/PBV in the Chicago Lawn community, for families & individuals with a Diagnosed Mental Illness.
Thresholds at Edgewater Shores	8	Leased	No	PRA/PBV in the Edgewater community, for individuals with a Diagnosed Mental Illness.
Thresholds RAD LLC (Austin Apartments)	5	Leased	No	PRA/PBV in the Austin community, for homeless, disabled individuals.
Thresholds RAD LLC (Graiss Apartments)	4	Leased	No	PRA/PBV in the Rogers Park community, for individuals with mental illness.
Thresholds RAD LLC (Rowan Trees Apartments)	6	Leased	No	PRA/PBV in the Englewood community, for individuals with mental illness.
Tierra Linda Apartments	14	Leased	No	PRA/PBV in the Logan Square/Humboldt Park communities, for families & individuals.
Town Hall Apartments	79	Leased	No	PRA/PBV located in the Lake View community, for seniors 55+ / LGBT-Friendly.
Trumbull Apartments (Spaulding and Trumbull Apartments)	13	Leased	No	PRA/PBV in the North Lawndale community, for homeless families.
Veterans New Beginnings	48	Leased	No	PRA/PBV in the Auburn Gresham community, for veterans-homeless individuals.
Victory Centre of South Chicago SA	18	Leased	No	PRA/PBV located in the South Chicago community, for seniors 62+.
Wabash Apartments	24	Leased	No	PRA/PBV located in the Washington Park community, for homeless families.

Warren Apartments	25	Committed	No	PRA/PBV in the Near West Side community, for families and individuals. 75 units of new construction; AHAP executed for 25 units.
Washington Park Apartments	32	Leased	No	PRA/PBV in Grand Boulevard community, for homeless individuals.
West Humboldt Place	4	Leased	No	PRA/PBV in the Humboldt Park community, for families with a child with HIV/AIDS.
Wilson Yards Family Apartments	16	Leased	No	PRA/PBV in the Uptown community, for families & individuals.
Wilson Yards Senior Apartments	20	Leased	No	PRA/PBV in the Uptown community, for seniors 62+.
Winterberry Place	6	Leased	No	PRA/PBV in the Grand Boulevard community, for families & individuals.
Wrightwood Apartments	5	Leased	No	PRA/PBV in the Logan Square community, for families.
Wrightwood Senior Apartments	17	Leased	No	PRA/PBV in the Ashburn community, for seniors 62+.
Xavier Apartments	24	Leased	No	PRA/PBV in the Near North Side community, for families & individuals.
Zapata Apartments	18	Leased	No	PRA/PBV in the Logan Square community, for families.
TOTAL	3,018			
RAD2 / PBV				
Deborah's Place III	90	Leased	Yes	RAD2 in the East Garfield Park community, for homeless female individuals.
Thresholds RAD LLC (Austin Apartments)	52	Leased	Yes	RAD2 in the Austin community, for homeless, disabled individuals.
Thresholds RAD LLC (Grais Apartments)	40	Leased	Yes	RAD2 in the Rogers Park community, for individuals with mental illness.
Thresholds RAD LLC (Rowan Trees Apartments)	39	Leased	Yes	RAD2 in the Englewood community, for individuals with mental illness.
TOTAL	221			
City-State / PBV				
Harrison Courts	123	Leased	No	City-State existing family housing units in the East Garfield Park community
Lathrop Elderly	92	Leased	No	City-State existing senior 62+ housing in the Lincoln Park community
Loomis Courts	124	Leased	No	City-State existing family housing in the Near West Side community
TOTAL	339			
Mod Rehab / PBV				
16 N Lorel	23	Leased	No	Mod Rehab in the Austin community, for families & individuals
4240-4248 S Michigan	42	Leased	No	Mod Rehab in the Grand Boulevard community, for families & individuals
4441-47 S Greenwood	32	Leased	No	Mod Rehab in the Kenwood community, for families & individuals
Austin Village	29	Leased	No	Mod Rehab in the Austin community, for families & individuals

Belray Apartments	70	Leased	No	SRO in the Lakeview community, for homeless individuals
Butler Lindon Apartments	5	Leased	No	SRO in the Woodlawn community, for homeless individuals.
Carlton/Magnolia Apartments	70	Leased	No	SRO in the Uptown community, for homeless individuals
Dickens Apartments	34	Leased	No	Mod Rehab in the Logan Square community, for families & individuals
Eddie Mae & Alex Johnson Apartments	29	Leased	No	SRO in the Woodlawn community, for homeless individuals.
Holland House	70	Leased	No	SRO in the Roseland community, for homeless individuals
Karibuni Place	60	Leased	No	SRO in the Chatham community, for homeless families & individuals.
Lawson House	100	Leased	No	SRO in the Near North Side community, for homeless individuals.
Los Vecinos Apartments	50	Leased	No	SRO in the Humboldt Park community, for homeless individuals.
Mae Suites	39	Leased	No	SRO in the Austin community, for homeless individuals
Major Jenkins	80	Leased	No	SRO in the Uptown community, for homeless individuals.
Pine Central	35	Leased	No	Mod Rehab in the Austin community, for families & individuals
Rebecca Walker	22	Leased	No	SRO in the Austin community, for homeless individuals
Renaissance Partners	100	Leased	No	SRO in the Douglas community, for homeless individuals
Washington Park Apartments	31	Leased	No	SRO in the Grand Boulevard community, for homeless individuals.
TOTAL	921			
Regional Housing Initiative - In Chicago / PBV				
Casa Kirk	5	Leased	No	RHI-I: PRA/PBV in South Chicago community, for families. Regional Housing Initiative in Chicago.
Casa Morelos	9	Leased	No	RHI-I: PRA/PBV in the Lower West Side community, for families & individuals.
G&A Residence at Spaulding	9	Leased	No	RHI-I: PRA/PBV in the Humboldt Park community, for families.
Leland Apartments	14	Leased	No	RHI-I: PRA/PBV in the Uptown community, for families & individuals.
North Avenue Apartments	16	Leased	No	RHI-I: PRA/PBV in the West Town community, for families & individuals.
Nuestro Hogar	12	Leased	No	RHI-I: PRA/PBV in the Humboldt Park community, for families.
Wentworth Commons	10	Leased	No	RHI-I: PRA/PBV in the Roseland community, for families.
TOTAL	75			
Regional Housing Initiative - Outside Chicago / PBV				
Colonial Park Apartments	60	Leased	No	RHI-O: PRA/PBV in Park City Illinois, for families.
Congress Park Apartments	6	Leased	No	RHI-O: PRA/PBV in Crystal Lake Illinois, for families & individuals.
Hope Manor Joliet Apartments	42	Leased	No	RHI-O: PRA/PBV in Joliet Illinois, for veterans--families & individuals

New Mom's Oak Park	18	Leased	No	RHI-O: PRA/PBV in Oak Park Illinois for, supportive housing for Single Mothers (age 18-24) with Children.
Pearl Street Apartments	12	Leased	No	RHI-O: PRA/PBV in Arlington Heights Illinois, for supportive housing for homeless and disabled households.
Woodstock Commons	22	Leased	No	RHI-O: PRA/PBV in Woodstock Illinois, for families & individuals.
2215 Dempster LLC	12	Leased	No	RHI-O: PRA/PBV in Evanston Illinois, supportive housing for families and individuals.
TOTAL	172			

**Planned Total Existing Vouchers to be
Project-Based as of December 31, 2020**

10,063

Overview of Planned and Existing Project-Based Vouchers in FY2020

Through its Property Rental Assistance (PRA) Program, CHA invests in privately-owned rental housing throughout the city of Chicago to create affordable housing opportunities. CHA also utilizes the HUD-funded RAD program to preserve and create new housing opportunities in the city of Chicago. By the end of FY2020, it is anticipated that a total of 15,693 PBVs will be under agreement including 1,580 new PBVs.

The following is an overview of CHA's PBV initiatives through the PRA Program and the RAD program by category:

- **Project-Based Vouchers / Rental Assistance Demonstration (RAD)**
By the end of FY2020, CHA projects that 7,148 units will be converted to RAD PBVs utilizing Component 1 of HUD's RAD Program. Of that number, 5,317 are existing RAD1 PBV conversions and 1,831 are new RAD1 PBV conversions scheduled for delivery in FY2020.
- **PRA PBVs**
By the end of FY2020, through the PRA Program, CHA will subsidize 3,018 housing units through partnerships with developers/owners and service providers. This includes 1,706 high quality affordable housing units to families, seniors and individuals; and 1,312 supportive housing units for families and individuals in need of comprehensive supportive services. Target populations for supportive units include those who are homeless or at risk of becoming homeless, those facing serious persistent life challenges such as HIV/AIDS, mental illness, alcohol/substance abuse, veterans in need of supportive services, young single parents and persons with physical and/or developmental disabilities.
- **City/State PBVs**
CHA continues to administer 339 project-based units across three City-State sites under HAP contracts with HUD: Harrison Courts, Loomis Courts, and Lathrop Elderly.
- **Regional Housing Initiative**
The Regional Housing Initiative (RHI), formed in 2002, is a consortium of regional housing authorities that have pooled PBVs to allocate to competitively selected developments in each housing authority's jurisdiction. Through RHI, property rental assistance is awarded to developers committed to preserving and/or increasing the supply of affordable rental housing and expanding affordable housing options located near employment centers and/or public transportation providing easy access to employment opportunities. RHI is staffed by the Metropolitan Planning

Council (MPC) and works closely with the Illinois Housing Development Authority (IHDA) when reviewing applications that are being considered by IHDA for Low Income Housing Tax Credits. ^[1]

In FY2012, HUD provided \$1 million to fund a three-year pilot program to expand RHI's capacity to increase quality affordable housing options throughout the region near jobs, transit, schools, shopping and other key neighborhood amenities for eligible families on the participating PHAs' waiting lists. Under the Pilot, a central referral system was established that consists of applicants from each PHA's existing waiting lists who expressed interest in moving to other geographic areas throughout the region. In FY2020, CHA will maintain its participation in the RHI Pilot Program in order to offer applicants on CHA's wait list broader housing alternatives in areas of opportunity throughout the Chicagoland region.

By the end of FY2020, a total of 247 CHA PBV units are expected to be under HAP contracts in the region through RHI. Of these, 172 units are located outside of the boundaries of Chicago and 75 units are located within the Chicago city limits.

- **Moderate Rehabilitation**

Similar to PRA, Mod Rehab, provides property-based rental assistance to low-income households but is governed by separate regulations. CHA continues to work with the properties benefitting from the Mod Rehab program and will process applications to CHA's PRA/PBV portfolio either through RAD conversions or the standard PRA/PBV selection process.

CHA has been working with HUD to assist properties that currently benefit from the Mod Rehab program to apply for the RAD2 opportunity. During FY2020, Mod Rehab will assist 921 units.

Summary of PRA/PBV Units Counted Toward Overall Unit Delivery Progress

In FY2020, CHA projects a total of 314 new PBV units under HAP contracts to be counted towards unit delivery. By the end of FY2020, CHA expects to have a total of 3,735 PBV units counted towards unit delivery, including 3,332 PRA PBVs and 403 new construction RAD1 PBVs not previously counted toward unit delivery.

v. Planned Other Changes to the Housing Stock in FY2020

The following section describes other planned changes to CHA's housing stock during FY2020 by category, including Disposition Activity, Long-term Plan for Offline Units, Additional Capital Maintenance Activity and Additional Redevelopment Activity.

Other Changes to the Housing Stock Planned in FY2020
<p><i>Planned Disposition Activity</i> CHA plans to dispose of vacant property for market value and for future redevelopment at Cabrini.</p>
<p><i>Long-Term Plan for Offline Units Status</i> As of Q1 2019, CHA has 1,133 PH units offline and unavailable for occupancy pending redevelopment and other HUD-approved reasons. In coordination with HUD, CHA continues to prioritize reducing the number of offline units and making additional units available for occupancy as soon as possible.</p>
<p><i>Additional Planned Capital Maintenance Activity</i> CHA will continue or begin various capital maintenance projects in FY2020</p>
<p><i>Additional Planned Redevelopment Activity</i> CHA will continue redevelopment planning at several sites and anticipates several financial transaction closings in FY2020.</p>

^[1] For more information on RHI, see MPC's website at www.metroplanning.org.

Planned Disposition Activity for FY2020

PLANNED FY2020 DISPOSITIONS*							
IL Number	Development/ Site	Northern Boundary	Southern Boundary	Eastern Boundary	Western Boundary	Type of Disposition (Ground Lease, Fee Simple, Land Swap etc.)	Description of FY2020 Activity This should include justification, detailed info on purpose, number of units (if applicable), indicate vacant land (if applicable).
N/A	North of 420 W. North Ave.	1612 N. Sedgwick	South line of alley	North Sedgwick Street	North/south alley	Fee Simple	Deed portion of vacated alley to adjacent neighbor for full market value.
	420 W. North Ave.	420 W. North Ave.				Ground Lease or Fee Simple	Possible disposition for redevelopment which will include CHA housing
N/A	N/A	4120-34 S. St. Lawrence/538-40 E. Bowen				Fee Simple	Dispose of vacant land for market value
N/A	N/A	659 E. Bowen (correction to 2019 plan which listed Property as S. Langley)				Fee Simple	Dispose of vacant land for market value
IL00202000	Cabrini	Elm St	Oak St	Cleveland St	Larrabee St	Ground Lease and/or Fee Simple	Disposition for redevelopment that will include CHA housing
IL00202000	Cabrini	Alley north of Clybourn	Clybourn Ave	Mohawk St.	Larrabee St.	Ground Lease and/or Fee Simple	Disposition for redevelopment that will include CHA housing
IL2037B	Robert Taylor	47th	53rd	State Street	Rail West of Federal	Ground Lease and/or Fee Simple	Disposition for redevelopment which may include CHA housing or disposition for market value
	Scattered Site	3911 S. Indiana				Ground Lease and/or Fee Simple	Dispose of vacant land for market value
	Scattered Site	3917 S. Indiana				Ground Lease and/or Fee Simple	Dispose of vacant land for market value

*Other disposition activity previously included and approved in annual plans may also be carried out in FY2020.

Long-Term Plan for Offline Units Status

As of Q3 2019, CHA has 1,125 PH units across several categories that are currently offline and unavailable for occupancy for HUD-approved reasons. In coordination with HUD, CHA continues to prioritize reducing the number of offline units and making additional units available for occupancy as soon as possible. CHA also provides quarterly status updates directly to HUD and publicly through CHA's website. The following is a summary and status of CHA's long-term strategies to address offline units by category as of Q3 2019.

Units pending redevelopment/planning

As of Q3 2019, 761 units at Frances Cabrini Rowhouses and Lathrop Homes are offline due to pending redevelopment plans. CHA is moving forward to expedite the finalization of plans to the extent possible given community planning processes and key stakeholder input.

- *Frances Cabrini Rowhouses – 438 offline units (IL002089000):* In FY2015, CHA finalized a Development Zone Plan (DZP) for the remaining portions of Cabrini-Green with the assistance of

the City of Chicago's Department of Planning and Development, Chicago Park District, Chicago Department of Transportation, Chicago Public Schools, and the Near North Working Group. The DZP excluded the Frances Cabrini Rowhouses from its target area.

Under the FY2017 CHA MTW Annual Plan, CHA proposed to demolish the Frances Cabrini Rowhouses and commenced the Environment Assessment (EA) and environmental studies of the site. CHA completed initial EA research that highlighted the Rowhouses' eligibility for designation as a historic property. Consequently, in FY2018 CHA will work with the Illinois Housing Preservation Agency (IHPA) and the Chicago Department of Facilities and Fleet Management (2FM) and other stakeholders to determine CHA's redevelopment activities at the property in compliance with an existing Memorandum of Agreement and Court Order regarding development of this site.

CHA has started discussion with the residents of adjacent properties about RAD conversions. In Q1 2020, CHA intends to choose a development partner for the site. Additionally, CHA plans to submit a HUD RAD Public Housing application for the Rowhouses in FY2020.

- *Lathrop Homes – 323 offline units (IL002022000)*: CHA remains committed to deliver 400 family units on-site at Lathrop Homes through a combination of historically preserved housing, new housing, retail and other amenities in a mixed-income community. CHA and its development partner initiated construction on Lathrop Phase 1A in October 2017. A total of approximately 200 housing units will be completely rehabilitated in FY2018, including 91 for CHA residents. The remaining units, including 60 for CHA residents, are expected to be completed in FY2019. CHA is working to create off-site units in accordance with the Lathrop Homes Agreed Court Order.

Units undergoing capital maintenance

This category includes units held offline for ongoing and upcoming maintenance or extensive rehabilitation work across CHA's portfolio. As part of CHA's strategy to modernize, maintain and preserve its existing housing stock and ensure compliance with all regulatory and safety requirements, CHA is making strategic investments at several priority properties. These capital investments require that some units in occupied buildings be vacated for construction to occur; however, CHA has committed to holding only the minimum number of units offline for the duration of construction projects and resuming leasing as soon as feasible when units are completed. While CHA will hold only the minimum number of units offline for construction, major capital projects at larger sites consist of rolling rehabilitation of units and the number of offline units will fluctuate until all current residents in specific properties are housed in newly-rehabilitated units. As of Q3 2019, 200 units are offline for capital maintenance.

In FY2020, a total of seven major capital projects will continue or begin. The following is a summary of major capital projects for FY2020.

FY2020 Major Capital Projects				
IL Number	Project/Site	Construction Start	Units Back Online/Available for Leasing	Project Description
Various	General Renovation of Scattered Sites Units	Various	Various	Varies per site; generally complete renovation including upgrades, full replacements or repairs to plumbing and electrical infrastructure, exterior envelope restorations, windows, roofs and site work
N/A	Las Americas Apartments (1611 S Racine) RAD	September 2019	September 2020	Reconfiguration, reprogramming and renovation of the building's ground floor and common spaces. Including accessibility upgrades to

				corridors, trash and laundry rooms. Roof Replacement and selective envelope and HVAC repairs.
N/A	Lorraine Hansberry Apartments (5670 W Lake)- RAD	September 2019	September 2020	Roof Replacement and Façade Repairs. Including selective upgrades to common area amenities and finishes
IL002072000	Maria Diaz Martinez Apartments (2111 W Halsted)	November 2019	November 2020	Roof resurfacing, site improvements and selective upgrades to common area amenities, finishes and additional laundry room facility.
IL002041000	Mahalia Jackson Apartments (9141 & 9177 S. South Chicago)	April 2020	April 2021	Renovation to include upgrades, full replacements or repairs to plumbing and electrical infrastructure, exterior envelope restorations, windows, roofs and site work.
IL002060000	Ella Flagg Young Apartments (4645 N. Sheridan)	April 2020	April 2021	Renovation to include upgrades, full replacements or repairs to plumbing and electrical infrastructure, exterior envelope restorations, windows, roofs and site work.
N/A	Judge Wendell Green Apartments - (4030 S. Lake Park Ave) RAD	June 2020	June 2021	Renovation to include upgrades, full replacements or repairs to plumbing and electrical infrastructure, exterior envelope restorations, windows, roofs and site work.

Units pending demolition/disposition

Units in this category are pending demolition or disposition and will not come back online. As of Q3 FY2019, there are 5 units offline pending demolition or disposition activity.

Units used for non-dwelling purposes

As of Q3 FY2019, CHA currently uses only 159 units for non-dwelling purposes. CHA continues to evaluate non-dwelling use of units across its portfolio.

Additional Planned Redevelopment Activity in FY2020

- ***Altgeld Gardens-Murray Homes Community Facility:*** In FY2019, CHA commenced construction of a new community facility at the Altgeld Gardens and Murray Homes Public Housing developments. The new center, owned by AFRC LLC, which was created by CHA Community Support Corporation, a 501 (c) 3 created to provide support to CHA residents and initiatives, will include a state licensed child care program, community and library spaces. The library portion is funded by proceeds from New Market Tax Credits.
- ***Cabrini Green:*** In FY2017, CHA awarded development teams for two Phase I sites under the Cabrini Green DZP. CHA and its selected developer plan to obtain the necessary approvals—including low income housing tax credit allocations—to initiate construction on these parcels in FY2020 and 2021.
- ***Harold Ickes Homes (IL002016000):*** CHA selected a development team to redevelop the former Ickes site as a mixed-income, mixed-use development, including CHA family units and other residential, commercial, institutional, and recreational components, that will provide a minimum of 200 units for CHA families. Phases IA and B are under construction. In 2020, these phases will deliver approximately 206 total new rental apartments consisting of 68 CHA, 26 other affordable and 112 market rate units. Of the 68 CHA units, 4 will be fully accessible and 10 will be adaptable.

- Lakefront Properties Phase II For Sale Development: Lakefront's developer plans to initiate construction on the Sullivan Station for-sale development as part of the Lakefront Properties Phase II redevelopment activities. The new homeownership units will be dispersed among the 12 new Phase II rental three- and six-flat structures located on the Lakefront Properties Phase II site. (This was previously included as proposed disposition activity in CHA's FY2016 MTW Annual Plan.)
- Lathrop Homes Phase IB: Lathrop's developer plans to close and start construction in FY2020 on the second phase of Lathrop Homes redevelopment to provide approximately 242 total new housing units, including 96 CHA, 42 affordable and 104 market rate units.
- Lawndale Complex/Ogden Courts: In FY2017, CHA selected a development team for the remaining undeveloped land formerly known as Lawndale Complex and Ogden Courts. In FY2019, the development team closed and commenced construction on a new commercial building which is expected to open in early 2021. The development team is also working on a first phase of residential units.
- LeClaire Courts: In FY2019, CHA awarded a development team the opportunity to redevelop the LeClaire Courts site. CHA contemplates multiple closings in FY2021 – FY2024.
- Emmett Street Project (IL# to be assigned upon closing): In FY2020, CHA plans to participate with the development team to close and start construction on a new mixed-income development at 2630 N. Emmett Street in Logan Square. This RAD PBV subsidized development will provide approximately 100 total new housing units including 50 for CHA and 50 other affordable families. Of the 50 CHA units projected for delivery in FY2020 and 2021, 3 will be fully accessible and 7 will be adaptable.
- Oakwood Shores/Former Madden Wells – 534 Pershing: In FY2020, CHA plans to commence construction on the Oakwood Shores 534 Pershing development as part of the Madden Park, Ida B. Wells, Darrow Homes revitalization activities. This phase will create approximately 53 new mixed-income housing units including up to 20 apartments for CHA families. Of the CHA units, approximately 2 will be fully accessible and approximately 4 will be adaptable. These units will be developed as PH with a conversion to RAD PBV at construction completion/loan conversion to permanent.
- Oakwood Shores/Former Madden Wells – Phase IC For Sale: In FY2020, CHA plans to convey land for the Oakwood Shores Phase IC for sale development as part of the Madden Park, Ida B. Wells, Darrow Homes revitalization activities. The new homeownership units will be dispersed across the Oakwood Shores revitalization site.
- Park Boulevard/Former Stateway Gardens: CHA plans to convey land for the next phase of Park Boulevard as part of the Stateway Gardens revitalization activities. CHA's development partner plans to commence construction on new for sale housing in FY2020 or 2021. During the same time period, CHA plans to participate with the developer in a real estate transaction to create new rental housing units. Further, in 2019, CHA received authority to swap equal land with the City of Chicago in order to spur commercial and/or mixed-use development to further redevelopment goals for both the former Stateway Gardens and Robert Taylor sites.
- Parkside of Old Town 4 Phase 2 (also referred to as Phase III)/Former Cabrini (IL# to be assigned upon closing): In FY2019, CHA participated in a real estate transaction for Parkside 4 Phase 2 at Parkside of Old Town, which is expected to provide a total of 102 mixed-income housing units including 35 CHA RAD PBV units, 31affordable units and 36 market rate units. Phase III is the final phase of Parkside of

Old Town, which is part of Cabrini North Extension replacement housing. Of the 35 CHA units, two will be fully accessible and six will be adaptable.

- Robert Taylor Homes: In FY2020-21, CHA plans to dispose of land formerly part of the Robert Taylor Homes for a new development that may include mixed-use, commercial and/or other uses. Additionally, CHA plans to convey land for the Legends South for sale development as part of the Robert Taylor Homes revitalization activities. The new homeownership units will be dispersed across the Robert Taylor revitalization site.
- Roosevelt Square/Former ABLA Homes: CHA conveyed property to SOS Villages to develop a new community center.
- Ravenswood Senior Living Apartments (formerly The Winchester): In FY2019, CHA's developer closed and started construction on Ravenswood Senior Living Apartments at 4501 N. Winchester. This RAD project-based voucher subsidized development will create approximately 74 new CHA senior housing units. All units are projected for delivery in FY2021. Of the 74 total CHA units, 4 will be fully accessible and 12 will be adaptable.
- Washington Park 45th & Cottage Grove – Phase I (IL# to be assigned upon closing): CHA's developer closed and started construction in FY2018 on the first phase at 45th & Cottage Grove (part of Washington Park). This development is expected to deliver, in 2020, 84 new rental apartments for 21 PH, 38 affordable and 25 market rate families. Of the 21 PH units, 2 will be fully accessible and 4 will be adaptable.
- Westhaven Phase IID Rental/Former Henry Horner: CHA's developer was planning for the next Westhaven rental development to close and start construction in FY2018 but the development was not allocated Illinois Housing Development Authority (IHDA) low-income housing tax credits (LIHTCs). The developer applied to the City of Chicago in FY2019. This development plans to provide approximately 89 total new rental apartments including 35 for PH residents in fulfillment of the Henry Horner HOPE VI CHA unit delivery requirements.

Funding for Redevelopment Activities

In response to Choice Neighborhoods or other Federal Notices of Funding Availability (NOFAs) released in FY2020, CHA may submit application(s) for grant funding for redevelopment and/or planning activities.

Additional Planned Capital Maintenance Activity in FY2020

- Continuation of elevator modernization program throughout portfolio.
- Continuation of the installation of new trash enclosures and lifts, and sewer repairs at Dearborn Homes.
- Storefront replacement, upgrades and expansion to existing domestic hot water system and upgrades to select finishes at Charles Hayes Family Investment Center (FIC)

vi. General Description of Planned Capital Expenditures in FY2020

General Description of Planned Capital Fund Expenditures During FY2020

CHA's anticipates a total of \$168.7M in planned capital expenditures for FY2020:

- \$5.0M in architectural and engineering fees and other planned construction activities and upgrades for CHA scattered sites, senior properties and elevator modernization.
- \$2.0M in planned upgrades and renovation at Overton Section 3 Field Office
- \$1.7M in planned upgrades for elevator modernization at various senior developments.
- \$0.6M in planned upgrades and repairs at various CHA scattered site locations.
- \$83.6M in construction or planning/pre-development activities for mixed-income/mixed-finance properties, Clybourn & Larrabee, Lathrop Phase 1B, Emmett Street (FKA Logan Square), Southbridge (FKA Ickes) Phase 1A & 1B, Parkside 4 Phase 2, Oakwood Shores 534, Ravenswood Senior Living-4501 N. Winchester, Sheffield, Park Boulevard Phase 3A/3B, Cabrini-Oak & Larrabee, 4630 S. Ashland, LeClaire and other master planning activities.
- \$64.1M in planned construction activities, upgrades and repairs for senior buildings that will transition to the Rental Assistance Demonstration (RAD) program.

Section II-B: Leasing Information

i. Planned Number of MTW Households Served at the End of FY2020

By the end of FY2020, CHA anticipates serving a total of 56,671 MTW households across HCV and PH programs.

Planned Number of Households Served		
Planned Number of Households Served Through:	Planned Number of Unit Months Occupied/Leased*	Planned number of Households to be Served**
MTW Public Housing Units Leased	131,880	10,990
MTW Housing Choice Voucher (HCV) Utilized	551,472	45,956
Local, Non-Traditional: Tenant-Based***	0	0
Local, Non-Traditional: Property-Based***	0	0
Local, Non-Traditional: Homeownership***	0	0

Planned Total Households Served

56,946

*Unit months occupied/leased is the total number of months the PHA has leased/occupied units according to unit category during the fiscal year

**Calculated by dividing the planned number of unit months occupied/leased by 12

***In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the agency should estimate the number of households to be served.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED
Tenant-Based	N/A	N/A	N/A
Property-Based	N/A	N/A	N/A
Homeownership	N/A	N/A	N/A

Planned Number of Non-MTW HCV Households Served at the End of FY2020

By the end of FY2020, CHA anticipates serving a total of 2,429 households through non-MTW voucher programs, including Veterans Affairs Supportive Housing (VASH), Moderate Rehab, Mainstream 5-Year and RAD programs.

Non-MTW Households to be Served Through:	Planned Number of Unit Months Occupied/Leased	Planned Number of Households Served
VASH	15,636	1,303
Mod Rehab	11,844	987
Mainstream 5-Year	1,668	139
RAD	63,732	5,311
Total Non-MTW Households	92,880	7,740

ii. Description of Anticipated Issues Related to Leasing in FY2020

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers or Local, Non-Traditional Units and Solutions in FY2020	
Housing Program	Description of Leasing Issues and Solutions
MTW Public Housing Program	CHA will continue to prioritize the issue of offline units in FY2020 and make additional units available for occupancy as expeditiously as possible. CHA empowers applicants to match their housing needs to CHA PH offerings based on property and neighborhood information shared via the CHA application portal. This flow of information more expeditiously houses applicants and leases PH units.
MTW Housing Choice Voucher Program	In FY2020, CHA will continue to increase housing opportunities to HCV participants by facilitating lease-up in mobility areas through increased use of its exception payment standard and modified landlord incentive payments programs.

Section II-C: Wait List Information

Overview of Wait Lists

Public Housing Wait Lists

- **Family Housing (Site-Based) Wait List:** The Family Housing (Site-Based) Wait Lists include adult applicants who are interested in units within CHA's citywide traditional family portfolio and mixed-income housing properties. Applicants have selected property or property-group site-based wait lists. Family Housing Site-Based Wait Lists will remain open in FY2020.
- **Scattered Site (Community Area) Wait Lists:** The Scattered Site (Community Area) Wait Lists include applicants interested in housing opportunities in CHA's scattered site portfolio. CHA has a

wait list for 65 of the 77 community areas in the city of Chicago where scattered sites are location. In FY2020, Scattered Sites (Community Area) Wait Lists will remain open.

- **Senior Site-Based Wait Lists:** The Senior-Site Based Wait Lists are for age-eligible applicants requesting studio and one-bedroom apartments in senior designated housing developments. CHA will continue to lease according to the current, approved Senior Designated Housing Plan. In FY2020, all Senior Site-Based Wait Lists will be open and accept applications.

PBV (PRA) Wait List: In FY2019, CHA transitioned to site-based PRA wait lists, allowing applicants to select housing by specific property, supportive service need, and general location.

HCV Wait List: In FY2020, CHA plans to continue the screening of applicants on the HCV Wait List and, where eligible, offer an opportunity to be housed by becoming a participant in CHA's HCV Program. CHA's HCV Wait List was last opened in late FY2014, and will remain partially opened for demonstration programs and special initiatives in FY2020.

i. Wait List Information Anticipated

Wait List Information Projected for the Beginning of FY2020				
Wait List Name	Description	Number of Households on Wait List	Wait List Open, Partially Open or Closed	Are There Plans to Open the Wait List During FY2020
Federal MTW Public Housing Units	Site-Based Family Housing	27,875	Open	Open
Federal MTW Public Housing Units	Program Specific Scattered Site/Community Area	27,100	Open	Open
Federal MTW Public Housing Units	Site-Based Senior	4,500	Open	Open
Federal MTW Project-Based Voucher Program	Program Specific Project-Based Vouchers	44,900	Open	Open
Federal MTW Housing Choice Voucher Program	Program Specific Tenant-Based Vouchers	40,910	Partially Open	No

Please describe any duplication of applicants across wait lists:

CHA Wait List applicants can be on a single PH Wait List, the PBV Wait List and the HCV Wait List at the same time.

Senior Site-Based Wait List includes applicants for PH properties slated for RAD conversion through FY2020. Those applicants may or may not have been captured in the HCV or PBV sections of the report.

Description of Partially Opened Wait Lists

HCV and PRA/PBV Wait Lists

In FY2020, the CHA HCV Wait List will remain open for the following families:

- a) A family that meets the eligibility criteria for and is participating in a CHA demonstration program or special initiative
- b) A family that is a victim of a federally declared natural disaster affecting the city of Chicago
- c) A family that is an active participant in a Witness Protection Program or State Victim Assistance Program
- d) A family living in a CHA PH unit which must be rehabilitated to meet ADA/504 requirements and for whom an alternate CHA PH unit is not available

- e) An over-housed or under-housed family living in a Section 8 Moderate Rehabilitation project administered by CHA for which no appropriate size unit is available in the same project that is already under a HAP contract
- f) A family that qualifies for a targeted funding voucher (e.g. VASH, NED, FUP, etc.)

Description of Local, Non-Traditional Program

N/A

Description of Other Wait List Type

N/A

ii. Changes to CHA Wait Lists in FY2020

Planned Changes to Wait Lists in FY2020	
Wait List Name	Description of Planned Changes to Wait List
N/A	

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Section Three **PROPOSED MTW ACTIVITIES**



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Section III: Proposed MTW Activities: HUD Approval Requested

For FY2020, CHA is requesting approval for significant changes to two previously approved activities.

Significant Changes to Previously Approved Activities

Choose to Own (CTO) Homeownership Program for Public Housing and HCV (2011-01)

- Plan Year Approved, Implemented, Amended: Approved FY2011 (expansion to Public Housing), Implemented FY2011, Amended FY2014 (new income eligibility requirement)
- Description: Participants of this program receive a subsidy to be used toward the payment of their monthly mortgage obligation. Pre- and post-homeownership education and counseling requirements are an integral component to remaining an eligible participant. The overall impact of the CTO Program is to increase self-sufficiency and expand housing options through opportunities for homeownership.

In FY2011, CHA expanded the CTO program beyond HCV participants to include PH residents. In FY2014, CHA received approval to institute a higher minimum income requirement for eligibility for the CTO Homeownership Program to 50% of the AMI to support the goal of participants successfully transitioning to self-sufficiency once the program was over. This change does not apply to those who are elderly or disabled who enroll in the program. The overall impact of the CTO Program is to increase self-sufficiency and expand housing options through opportunities for homeownership.

Proposed Change: In the FY2017 MTW Annual Plan, CHA's HCV Program sought HUD approval to remove calculation of assets upon recertification of participants. Currently, participants of CHA's CTO program at year ten are required to calculate equity in the home as part of an asset. Based on the previously approved HCV MTW activity, this amount is being zeroed out, but only after CHA goes through the process of calculation. Therefore, CHA would like to modify the CTO activity to waive the calculation of equity assets to increase administrative efficiency.

No changes to data collection metrics or authorizations are required to implement this change.

- Update: Now in the 17th year of the program, 604 participants have purchased their own home and 184 have assumed their own mortgage.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: As noted above CHA is proposing to modify the CTO activity to waive the calculation of equity assets to increase administrative efficiency.
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmarks for FY2020.

Standard Metric	Unit of Measurement	Baseline	FY2020 Benchmark
SS-5: Households Assisted by Services that Increase Self-Sufficiency	Number of households receiving services aimed to increase self-sufficiency (increase).	0 families enrolled under new income requirements.	30 families will enroll under new income requirements.
SS-8: Households Transitioned to Self-Sufficiency*	Number of households transitioned to self-sufficiency (increase).	0 families purchased homes before this activity was approved.	30 families (27 HCV and 3 PH) will purchase homes.

HC-6: Increase in Homeownership Opportunities	Number of households that purchased a home as a result of the activity (increase).	0 families purchased homes before this activity was approved.	30 families (27 HCV and 3 PH) will purchase homes
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*For the SS-8 standard metric tracking, CHA is establishing the purchase of a home through CTO as a definition of self-sufficiency.

- **Data Collection:** CHA will track the number of homes purchased by both PH residents and HCV program participants.
- **Authorization:** Attachment C, Section B, Paragraph 1(b)(iii), and Attachment C, Section D, Paragraph 8 (a-b), which waives certain provisions of Sections 8 (o)(15) and 8(y) of the 1937 Act and 24 C.F.R 982.625 through 982.643.

Incentive Payments for Landlords in CHA Mobility Areas (2017- 02)

- **Plan Year Approved, Implemented, Amended:** Approved FY2017, Implemented FY2017
- **Description:** CHA received approval to provide a one-time incentive payment in the amount of the contract rent to landlords when an HCV participant enters into a new lease for a unit located in a Mobility Area. The tight rental market in Chicago, especially in Mobility Areas, coupled with the additional processing time to lease-up an HCV tenant compared to a market rate tenant, may provide a disincentive for Mobility Area landlords to participate in the HCV Program. CHA believes this payment incentivizes more landlords in Mobility Areas to participate in the HCV Program.

On average, it takes 51 days from the time an RTA is submitted until execution of the final HAP contract. Many landlords in tighter rental markets (such as Mobility Areas) forego participating in the HCV Program because of this additional processing time, which results in a prolonged vacancy and amounts to at least one month of lost rent for the unit. This incentive partially off-sets any losses the landlord may incur as a result of holding the unit for a tenant with a voucher. This payment is made simultaneously with the initial HAP payment.

A potential impact of this activity is increased costs to CHA for such payments. On average, per-unit rental price in Mobility Areas is approximately \$1,300 per month. In FY2017, when initially implementing this activity, CHA placed a cap at 750 on such payments, with the maximum total amount of approximately \$975,000 (based on the average \$1,300 monthly rental amount). In FY2019, CHA anticipates spending \$2,300,000 on such payments based on the increased number of units eligible for such payments after the switch to the Mobility Area map and increasing FMRs.

Proposed Change: CHA has closely monitored the costs of this activity since it was first implemented and is now proposing to limit the LIP to only those new owners to the HCV program who lease new units in Mobility Areas. Based on available data, CHA anticipates spending approximately \$450,000 annually on this activity if this modification is approved. No changes to data collection, metrics or authorizations are required to implement these changes.

In conjunction with this activity, the CHA also commits to study ways to streamline its lease-up process to decrease the need for these types of payments in the future. If CHA is able to reduce the time from when an RTA is submitted to when a HAP contract is executed, HCV participants will be at less of a disadvantage in the rental market. CHA proposed that these incentive payments are funded using HCV HAP funds, rather than HCV administrative funds.

- Update: From FY2017 through early FY2018, CHA used the Opportunity Area map to determine where incentive payments would be made. In March FY2018, CHA began using the new Mobility Area map to issue Landlord Incentive Payments (LIPs), which resulted in an increase in the amount of funds spent on this program. In FY2019, CHA anticipates spending \$2,300,000 on landlord incentive payments due to the increased number of units eligible for these payments after the change to the Mobility Area map and increasing FMRs. As outlined below, CHA is now proposing a modification to this activity that would reduce the future costs of this activity.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: CHA proposes limiting the Landlord Incentive Payment to only those new owners to the HCV program who lease new units in Mobility Areas. Based on available data, CHA anticipates spending approximately \$450,000 annually on this activity if this modification is approved.
- Planned Changes to Metrics/Data Collection: The benchmark has been updated for FY2020.

Standard Metric	Unit of Measurement	Baseline	FY2020 Benchmark
HC-5: Increase in Resident Mobility	Number of households able to move to a neighborhood of opportunity as a result of this activity.	In FY2015, CHA had a total of 586 move into Opportunity Areas.	CHA anticipates that 261 households will move into Mobility Areas as a result of this activity.

- Data Collection: CHA will track the number of participants who move into a Mobility Area whose landlords receive an incentive payment simultaneous with their first HAP payment.
- Authorization: Amendment No. 6 to CHA's Amended and Restated MTW Agreement.

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Section Four **APPROVED MTW ACTIVITIES**



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Section IV: Implemented Activities

MTW Activities Related to Housing/Development

Revitalization of 25,000 Units (2000-01)

- Plan Year Approved, Implemented, Amended: Approved FY2000, Implemented FY2000.
- Description: CHA is committed to the goal of replacing 25,000 housing units as part of the original Plan for Transformation and MTW Agreement obligations. Each year CHA continues to make progress toward the goal by completing additional housing units and creating more housing options for CHA's residents. The impact of this activity is that more affordable housing opportunities are available to low-income residents in Chicago neighborhoods through rehabilitation, redevelopment, acquisition and the use of PBVs.
- Update: CHA continues to pursue a variety of unit delivery strategies to achieve the 25,000 unit goal. In FY2020, CHA plans to deliver an additional 343 PH and PBV units to achieve the 25,000-unit goal.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the FY2020 benchmarks.

Standard Metric	FY2020 Benchmark
HC-1: Additional Units of Housing Made Available	225 units of housing will be made available as a result of this activity
HC-2: Units of Housing Preserved	120 units of housing will be preserved as a result of this activity.

Alternate Reasonable Cost Formula for Redevelopment and Rehabilitation (2010-01)

- Plan Year Approved, Implemented, Amended: Approved FY2010, Implemented FY2010, Amended FY2014.
- Description: In FY2010, HUD approved an alternative reasonable cost formula for CHA redevelopment activities to replace HUD's current Total Development Cost (TDC) limits. Rising construction costs, reduced low-income housing tax credit equity prices, and reduced soft loan funds had combined to significantly reduce the number of new PH units that CHA was able to deliver at mixed-income development sites. The increased reasonable cost limits cover the full cost of PH units, as originally intended, and increase PH opportunities on an annual basis. The current impact of the increased reasonable cost limits is that CHA is able to finance the full cost of PH units in mixed-income developments which allows the tax equity and soft loan funds to be directed toward the construction of the accompanying affordable housing units at these mixed-income developments.

Through a FY2014 MTW Annual Plan Amendment, CHA received approval to utilize this alternative reasonable cost formula for both redevelopment and rehabilitation projects. Based on parameters for rehabilitation in the Capital Fund regulations, CHA had determined it no longer needed separate alternative reasonable cost limitations for rehabilitation and redevelopment. CHA instead utilizes one alternative reasonable cost formula for all projects moving forward, and, in accordance with

Capital Fund regulations, rehabilitation project cost levels will be no more than 90% of the alternate cost formula.

- Update: In FY2018, CHA used the alternate reasonable cost formula at 4400 Grove, which is schedule to deliver a total of 21 PH units in FY2020. CHA plans to use the alternate cost formula for two developments in FY2020 for approximately 50 CHA units to be delivered in FY2020/FY2021. CHA will not use the alternative cost formula for rehabilitation of any units in FY2020.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the FY2020 benchmark.

Standard Metric	FY2020 Benchmark
HC-1: Additional Units of Housing Made Available	4 additional PH units will be delivered through the use of the alternate TDC formula.
HC-2: Units of Housing Preserved	0 housing units will be preserved through use of the alternate TDC formula.
HC-3: Decrease in Wait List Time	57,000 applicants on PH Family Wait Lists will have an average wait time of 40 months.
HC-4: Displacement Prevention	0 households will lose assistance or have to move due to the use of the alternate TDC formula.
CE-1: Agency Cost Savings	CHA will use the alternate TDC formula to deliver 4 additional units at a cost of \$2,407,737 and place 6 additional units under construction at a cost of approximately \$3,000,000.

Units Planned for FY2020 Delivery that will use MTW TDC	PH Units without MTW TDC	Additional PH Units with MTW TDC	Total PH Units
4400 Grove (45 th & Cottage Grove Phase 1)	17	4	21
Total Units	17	4	21

Developments Planned to be Under Construction in FY2020 using MTW TDC	PH Units without MTW TDC	Additional PH Units with MTW TDC	Total PH Units
Oakwood Shores 534 Pershing	14	6	20
Total Units	14	6	20

Expedited Public Housing Unit Acquisition Process (2015-01)

- Plan Year Approved, Implemented, Amended: Approved FY2015
- Description: CHA is authorized to use MTW flexibility to support CHA's Real Estate Acquisition Program and to expedite the acquisition of units and/or buildings as PH units in CHA- designated

Opportunity Areas as well as Gautreaux-designated General and Revitalizing Areas. Through this activity, CHA would acquire units and/or buildings without prior HUD approval, provided that CHA certifies that HUD site selection requirements have been met. CHA would also be able to provide a commitment to certain developers before they acquire properties that they intend to sell to CHA after rehabilitation or construction. The units acquired may be condominiums, single-family homes (four or less units), or multifamily buildings containing non-PH units. Condominium properties with less than 10 dwelling units are excluded from this activity unless CHA acquires all of the dwelling units in the association.

While CHA would ensure that all applicable HUD and other federal requirements are met prior to acquisition, including environmental reviews, CHA would submit appropriate documentation to the local HUD Field Office for subsequent approval. Permitted costs for acquisition and rehabilitation would be within CHA's approved mixed-income TDC limits using the alternate cost formula previously approved by HUD. Environmental review would be completed by CHA's designated Responsible Entity. Further, CHA will not pay more for a property than its assessed value; if a property is purchased for more than the assessed value, CHA will make up the difference between the assessed value and purchase price with non-federal funds.

This initiative will increase the effectiveness of CHA's efforts to expand the number of available PH units, including in mixed-income settings, by allowing CHA to take advantage of time-sensitive market opportunities for unit and/or building purchases and by expediting the acquisition process. CHA continues to look for opportunities to acquire units as they become available.

- Update: CHA continues to look for opportunities to acquire units as they become available. CHA is in the midst of acquiring a 57-unit building that is partially occupied. Only a projection of vacant units is counted in the FY2020 benchmark.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the FY2020 benchmark.

Standard Metric	FY2020 Benchmark
HC-1: Additional Units of Housing Made Available	10 additional PH units will be made available as a result of this activity.
HC-3: Decrease in Wait List Time	57,000 applicants on PH Family Wait Lists will have an average wait time of 40 months.
HC-5: Increase in Resident Mobility	Up to 10 households will be able to move to a better unit and/or neighborhood as a result of this activity.

MTW Activities Related to Public Housing and HCV

\$75 Minimum Rent for Public Housing and HCV (2009-01)

- Plan Year Approved, Implemented, Amended: Approved FY2009, Implemented FY2009
- Description: Through the approval of the FY2007 ACOP for PH and the approval of the FY2008 HCV Administrative Plan, CHA instituted an increase in the minimum rent from \$50 to \$75 for PH and HCV programs. The \$75 minimum rent was approved in FY2009 and first implemented in

FY2009 across both programs as resident re-examinations took place. The impact of the revised minimum rent level is an increase in household contributions from residents paying the minimum rent. CHA continues to allow PH and HCV households to pay a minimum rent of \$75, or less if they request a hardship to minimum rent.

- Update:
 - HCV: As of March 2019, the minimum rent population (those paying \$75 per month) includes 7,884 households (approximately 19%) of the total HCV population. There are 438 additional HCV households (approximately 1% of the total HCV population) in the hardship population, meaning they are paying less than \$75 per month.
 - Public Housing: As of March 2019, the minimum rent population includes 2,019 PH and 141 RAD PBV households; 271 (13.4%) PH households and 51 (1.2%) RAD PBV households from the total minimum rent population have a hardship and are paying less than \$75.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the FY2020 benchmark.

Standard Metric	FY2020 Benchmark
CE-5: Increase in Agency Rental Revenue	<p><u>HCV:</u> 7,884 residents will pay \$75 minimum rent for a total annual contribution of \$7,095,600.</p> <p><u>Public Housing and RAD PBV</u> 1,945 households will pay \$75 minimum rent for a total annual contribution of \$1,750,500.</p>

*CHA tracks Total Tenant Payment (TTP) data to determine the number of residents who contribute \$75 towards rent and those granted hardships.

Modified Family Self Sufficiency Program for HCV and Public Housing Participants (2014-01)

- Plan Year Approved, Implemented, Amended: FY2014, FY2017, FY2018 and FY2019 updates
- Description: Over the past few years, CHA has modified the Family Self-Sufficiency (FSS) program. These include (from oldest to most recent):
 - In FY2014 a revision of the participation requirements included an opt-out of EID, the ability to terminate participants who were not engaged in the program, a 12-month employment requirement and annual requirement to participate in financial education and coaching.
 - In FY2017, CHA received authorization for an exemption from the requirement that FSS Program enrollments must take place within 120-days of an annual or interim recertification of income process. CHA PH and HCV households engage in a biennial income recertification schedule, unless changes in income are reported. As a result, any household wanting to enroll in FSS outside of the 120-day annual/interim window must request an interim recertification of income, even if the household income is unchanged, or they must wait up to 20 months until the next recertification.
 - In FY2018, CHA received authorization to move to a modified escrow calculation based on goal achievement rather than escrow based on an increase in earned income. The pay points and associated goals are included in CHA's approved FSS Action Plan.
 - In FY2019, CHA received approval to allow non-heads of household to enroll in the program and remove the interest earned from escrow to create a grant fund for participants.

- Update: Since the new escrow model went into effect in early FY2018, 51% of participants have completed the amendment to their COP and 84 new participants have enrolled under the new model.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmarks for FY2020.

Standard Metric	FY2020 Benchmark
SS-1: Increase in Household Income	The average income from wages among FSS participants will remain stable at \$18,000.
SS-2: Increase in Household Savings	The average escrow per FSS participant will remain stable at \$4,000.
SS-3: Increase in Positive Outcomes in Employment Status*	500 FSS participants will have income from wages.
	The percent of FSS participants with income from wages will remain stable at 50%.
SS-4: Households Removed from TANF	The number of FSS participants receiving TANF will remain stable at 100.
SS-5: Households Assisted by Services that Increase Self-Sufficiency	1,000 total FSS participants (including 200 new FSS participants) will be enrolled.
SS-6: Reducing Per Unit Subsidy Costs for Participating Households	<u>Public Housing</u> The average subsidy per PH household will be \$9,014.64 (based on 13,886 units).
	<u>HCV</u> The average subsidy per HCV household will be \$10,504.92 (based on 48,385 eligible vouchers).
SS-7: Increase in Agency Rental Revenue	<u>Public Housing:</u> The total contribution of PH FSS participants will remain stable at \$1,000,000 (230 households).
	<u>HCV</u> The total contribution of HCV FSS participants will remain stable at \$1,800,000 (500 households).
SS-8: Households Transitioned to Self-Sufficiency	50 participants will graduate from the program.

Triennial Re-examinations for Households with Only Elderly/Disabled Participants and Fixed Income for HCV and Public Housing (2014-02)

- Plan Year Approved, Implemented, Amended: Approved FY2014, Implemented FY2015
- Description: CHA has implemented a streamlined triennial re-examination schedule for PH and HCV fixed income households consisting of only elderly and/or disabled participants. Given the infrequency of income changes for these households, the impact of this activity is decreased staff time and resources currently utilized for conducting re-examinations for this population. In addition, this activity has decreased the re-examination burden for fixed income elderly/disabled households.

- Update:
 - HCV: All fixed-income households consisting of only elderly and/or disabled participants are currently on a triennial re-examination schedule.
 - Public Housing: As of March 2019, 6,716 households were placed on a triennial schedule, which will save the agency \$1,947,640 in reexam costs over the next three years.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmarks for FY2020.

Standard Metric	FY2020 Benchmark
CE-1: Agency Cost Savings	<p><u>HCV:</u> CHA will spend \$322,045 (2,221 reexams x \$145) to administer reexams for fixed-income elderly/disabled households who are due for reexams based on the triennial schedule.</p> <p><u>Public Housing:</u> CHA will spend \$232,000 (1,600 reexams x \$145) to administer reexams for fixed income elderly/disabled households who are due for reexams based on the triennial schedule.</p>
CE-2: Staff Time Savings	<p><u>HCV:</u> CHA will spend \$14,367 CHA staff hours (2,221 reexams x 6.5 hours) to administer reexams for fixed income elderly/disabled households who are due for reexams based on the triennial schedule.</p> <p><u>Public Housing:</u> CHA will spend 10,400 staff hours (1,600 reexams x 6.5 hours) to administer reexams for fixed income elderly/disabled households who are due for reexams based on the triennial schedule.</p>
CE-5: Increase in Agency Rental Revenue	<p><u>HCV:</u> Fixed income elderly/disabled households eligible for the triennial re-exam schedule are expected to contribute a year-end total of \$33,954,072(10,438 households).</p> <p><u>Public Housing:</u> Fixed income elderly/ disabled households eligible for the triennial reexam schedule are expected to contribute a year-end total of \$8,194,212 (2,418 households).</p>

Biennial Re-examinations for HCV and Public Housing (2014-03)

- Plan Year Approved, Implemented, Amended: Approved FY2014 (Public Housing), Implemented FY2016 (Public Housing), Implemented FY2006 (HCV)
- Description: CHA has implemented biennial re-examinations to review family circumstances, income, assets, expenses, and family composition to establish continued program eligibility for PH and HCV residents. Biennial re-examinations are applicable for those PH residents who are not on

annual or triennial re-examination schedules. ¹ The impact of this activity is a decrease in staff time and resources for conducting re-examinations for applicable families. In addition, this activity decreases the re-examination burden for participants who undergo re-examinations on a biennial basis instead of an annual basis.

- Update: All eligible PH and HCV residents are currently on a biennial re-examination schedule.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmarks for FY2020.

Standard Metric	FY2020 Benchmark
CE-1: Agency Cost Savings	<p><u>HCV</u>: CHA will spend \$2,089,885 (14,413 reexams x \$145) to administer reexams to households who are due for reexams based on the biennial schedule.</p> <p><u>Public Housing</u>: CHA will spend \$181,250 (1,250 reexams x \$145) to administer reexams to households who are due for reexams based on the biennial schedule.</p>
CE-2: Staff Time Savings	<p><u>HCV</u>: CHA will spend 93,685 staff hours (14,413 reexams x 6.5 hours) on reexams for households due for reexams based on the biennial schedule.</p> <p><u>Public Housing</u>: CHA will spend 8,125 staff hours (1,250 reexams x 6.5 hours) on reexams for households due for reexams based on the biennial schedule.</p>
CE-5: Increase in Agency Rental Revenue	<p><u>HCV</u>: HCV households who are eligible for biennial reexams will contribute a year-end total of \$121,041,036 (30,211 households).</p> <p><u>Public Housing</u>: PH households who are eligible for biennial reexams will contribute a year-end total of \$15,237,200 (2,800 households).</p>
SS-1: Increase in Household Income	<p><u>HCV</u>: The average income from wages for 30,211 HCV households eligible for biennial reexams is expected to be \$9,789 at year-end.</p> <p><u>Public Housing</u>: The average income from wages for PH households eligible for biennial reexams is expected to be \$16,725 (2,800 households) at year-end.</p>

¹ CHA conducts annual re-examinations for PH and HCV households participating in the CTO program and households in Moderate Rehab properties. CHA conducts triennial re-examinations for fixed income households with only elderly and/or disabled participants.

<p>SS-3: Increase in Positive Outcomes in Employment Status*</p>	<p><u>HCV:</u> 10,396 work-able HCV heads of household eligible for biennial reexams are expected to have income from wages.</p> <p>50% of work-able HCV heads of household eligible for biennial reexams are expected to have income from wages.</p> <p><u>Public Housing:</u> 1,440 work-able PH heads of household eligible for biennial reexams are expected to have income from wages.</p> <p>75% of work-able PH heads of household eligible for biennial reexams are expected to have income from wages.</p>
<p>SS-4: Households Removed from Temporary Assistance for Needy Families (TANF)</p>	<p><u>HCV:</u> The number of HCV households eligible for biennial reexams who receive TANF will remain stable at 1,167.</p> <p><u>Public Housing:</u> 318 PH households (out of 2,800 eligible for biennial reexams) will receive TANF.</p>
<p>SS-8: Households Transitioned to Self-Sufficiency**</p>	<p><u>HCV:</u> 2,171 HCV households (of 30,211 households eligible for biennial reexams) will move up at least one AMI category.</p> <p><u>Public Housing:</u> 250 PH households (out of 2,800 eligible for biennial reexams) will move up at least one AMI category.</p>

*For SS-3 tracking, CHA defines "work-able households" as those age 18 to 54 who are not receiving SSI, SSDI or a pension. CHA defines "employed" based on whether income from wages is recorded in Yardi, CHA's system of record.

**For SS-8 tracking, CHA is establishing the movement up to a higher AMI category as a definition of self-sufficiency.

CHA Re-Entry Pilot Program (2014-04)

- Plan Year Approved, Implemented, Amended: Approved FY2014, Implemented FY2015
- Description: In FY2014, CHA proposed a Re-entry Pilot Program for up to 50 eligible participants who are:
 - 1) Reuniting with a qualifying family member currently living in CHA PH (excluding mixed-income sites) or participating in CHA's HCV Program, or
 - 2) On a CHA wait list and meeting eligibility requirements for the program when they are called for screening (in the existing wait list order).
- Update: As of Q1 2019, there are 49 participants in the program. CHA is expecting the last application and remaining slot by the end of Q3 2019. Outside of this last application, CHA is no longer enrolling new participants.
- Planned Non-Significant Changes: Once at capacity, this activity will stop enrollment, while continuing to provide the services outlined in the activity description.
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmarks for FY2020.

Standard Metric	2020 Benchmark
CE-4: Increase in Resources Leveraged	\$125,000 in funds will be leveraged through the re-entry pilot program for services for 25 participants.
SS-1: Increase in Household Income	The average income from wages for households with program participants will be consistent with CHA's average.
SS-3: Increase in Positive Outcomes in Employment Status*	The percent of "work-able" heads of household with income from wages, with program participants, will be consistent with CHA's average.
SS-5: Households Assisted by Services that Increase Self-Sufficiency	25 participants will receive services.
SS-6: Reducing Per Unit Subsidy Costs for Participating Households	<p><u>Public Housing</u> The average subsidy per PH household will be \$9,014.64 (based on 13,886 units).</p> <p><u>HCV</u> The average subsidy per HCV household will be \$10,504.92 (based on 48,385 eligible vouchers).</p>
SS-7: Increase in Agency Rental Revenue	<p><u>Public Housing:</u> The total contribution of PH families with program participants will be consistent with CHA's average in FY2020.</p> <p><u>HCV:</u> The total contribution of HCV families with program participants will be consistent with CHA's average in FY2020.</p>
SS-8: Households Transitioned to Self-Sufficiency**	0 participants will transition from a conditional lease as there were none in this situation in the pilot
HC-5: Increase in Resident Mobility	No program participants are projected to move to CHA housing through the re-entry pilot program.

Mobility Counseling Demonstration Program Work Requirement (2016-01)

- Plan Year Approved, Implemented, Amended: Approved FY2016, Implemented FY2016
- Description: In FY2015, CHA designed a Mobility Counseling Demonstration Program for applicants on the PH Wait List as of December 16, 2014. Applicants who consent to participate in the program can move to either a CHA Opportunity or Gautreaux-designated General Area using a tenant-based HCV. Participants also have to agree to participate in mobility counseling services, which include education and information on tenant rights and responsibilities, community tours, and housing search counseling. Further, participants who move with the voucher receive \$500 towards their move in fee or security deposit. These services are consistent with CHA's existing mobility counseling program. In addition, participants receive 2 years of follow up services through CHA's FamilyWorks program, including social service supports necessary for obtaining and retaining employment and/or enrollment in education or training programs.

CHA determines eligibility from applicants who indicated interest after receiving a letter notifying them of the program as explained in the FY2018 MTW Plan. Because the population target was CHA applicants on the PH Wait List, CHA received HUD approval to carry over its work requirement to the participants.

CHA implemented the Mobility Counseling Demonstration Program in FY2015, prior to HUD approval of the work requirement component. Upon HUD approval, all new participants who consented to the program were subject to CHA's existing work requirement, PH Work Requirement (2009-02). Details of the full work requirement activity can be found under this activity. Participants unable to meet CHA's work requirement, who are not exempt, can apply for Safe Harbor which provides relief in 180-day increments while engaging in activities to become compliant.

- Update: As of June 30, 2019, 138 residents were housed; 88% of participants are employed, 9% are unemployed prior to receiving HUD approval to implement the work requirement and 3% are exempt due to disability. CHA has exhausted the list of participants who could take part in the demonstration, therefore, CHA will not be enrolling any new participants. CHA will continue to track metrics for the participants until the two-year required services has been achieved and will then close out this activity.
- Planned Non-Significant Changes: CHA has exhausted the list of participants who could take part in the demonstration and will not be enrolling any new participants.
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmarks for FY2020.

Standard Metric	FY2020 Benchmark
SS-1: Increase in Household Income*	The average income from wages for households with program participants will be consistent with CHA's average for PH households subject to the work requirement.
SS-3: Increase in Positive Outcomes in Employment Status*	The percent of program participant heads of household with income from wages will be slightly above CHA's average for PH households subject to the work requirement.
SS-4: Households Removed from TANF	0 households will be removed from TANF.
SS-5: Households Assisted by Services that Increase Self Sufficiency	100% of households participating in the program will receive services.
SS-6: Reducing Per Unit Subsidy Costs for Participating Households	The average subsidy per HCV household will be \$10,504.92 (based on 48,385 eligible vouchers).
SS-7: Increase in Agency Rental Revenue	The total contribution of HCV families with program participants will be consistent with CHA's average in FY2020.
SS-8: Households Transitioned to Self-Sufficiency**	The number of program participant households subject to the work requirement with all adults in compliance will be consistent with CHA's average for PH households subject to the work requirement.
HC-5: Increase in Resident Mobility	There will be no new families housed under this activity.

*For SS-1 and SS-3 tracking, CHA defines "work-able residents" as those age 18 to 54 who are not receiving SSI, SSDI or a pension. CHA defines "employed" based on whether income from wages is recorded in Yardi, CHA's system of record.

**For SS-8, CHA is establishing households in which all adults are compliant with the work requirement as a definition of self-sufficiency.

MTW Activities Related to Public Housing

Work Requirement for Public Housing Properties and Public Housing and Mixed-Income Properties Transitioning to PBVs or Added As PBVs Through the RAD Program (2009-02)

- Plan Year Approved, Implemented, Amended: Approved FY2009, Implemented FY2009, Amended FY2016
- Description: As outlined below, this activity is applicable to both Public Housing (PH) residents and residents of PH and Mixed-Income properties transitioning to PBVs through the RAD Program or added as PBVs through transfer of assistance under the RAD Program:
 - *Public Housing*
In FY2009, CHA implemented a work requirement as a condition of occupancy across its Public Housing (PH) portfolio that requires applicable adult members of PH households be engaged in employment or employment-related activities for at least 20 hours per week unless the resident is eligible for an exemption or granted Safe Harbor. The work requirement policy for PH residents is outlined in detail in the Public Housing Admissions and Continued Occupancy Policy (ACOP). With Board approval of the FY2011 ACOP, CHA changed the age range of the work requirement to apply to adult members of PH households age 18 to age 54, or age 17 and not attending school full time.²
 - RAD1 PBVs
In the FY2016 MTW Annual Plan, CHA updated this activity to reflect that existing work requirements in PH and Mixed-Income properties (as described above) transitioning to PBVs through the RAD Program or added as PBVs through transfer of assistance under the RAD program, as outlined in CHA's ACOP and Tenant Selection Plans, will apply to any individual previously subject to a work requirement as well as new residents after RAD PBV conversions. The work requirement policy for RAD PBV sites is also outlined in Chapter 18 of the HCV Administrative Plan, which was released for public comment in November 2014 and approved by CHA's Board in January 2015.

CHA provides resources to aid residents in fulfilling the work requirement through case management services and workforce development programs. The impact of the PH work requirement is a greater number of residents engaged in employment, education, job training, and community service in order to achieve self-sufficiency.

Since it was first approved, CHA has implemented the following updates to the PH work requirement:

- CHA increased the time for each Safe Harbor period from 90 days to 180 days. CHA determined that 90 days was an insufficient amount of time for residents to establish an action plan to meet the requirement, which has often resulted in multiple Safe Harbor requests. Increasing the time period to 180 days enables residents to work with a service provider to create and implement an action and engagement plan.
- CHA requires participation in services for all residents who receive Safe Harbor and for those who are non-compliant with the work requirement. Mandatory services are provided by CHA's FamilyWorks program. This requirement ensures that FamilyWorks service providers intervene in a timely manner to assist residents and provide them with the necessary support to become compliant with the work requirement. CHA implemented the following procedures to enforce this requirement:

² The original work requirement applied to every adult member of a PH household, age 18 to age 61 (or age 17 and not attending school full time).

- The resident and service provider develop and sign a resident-driven action plan upon the initial and any subsequent requests for Safe Harbor, which outlines what is needed to become compliant with the work requirement.
- At the end of the 180-day Safe Harbor period (or upon the resident obtaining employment), the FamilyWorks service provider will confirm that the resident is engaged with the work requirement, as defined in the agreed-upon individual action plan.
- Residents who are engaged, as defined by the action plan, but who need additional time will be approved to receive Safe Harbor or additional Safe Harbors, per provider-engagement process.
- Residents who are not engaged, as defined by the action plan, and are not meeting the work requirement will not be approved to receive additional Safe Harbors.
- Non-compliant residents are subject to lease termination.

Currently, upon initial and all subsequent requests for Safe Harbor, CHA requires residents who seek Safe Harbor for reason of failure to obtain employment to work with their service provider to obtain a workforce assessment and to develop an action plan prior to returning to a property manager. If a resident is seeking Safe Harbor for any other reason (e.g. waiting on SSI determination), this process does not apply. Residents who are approved for Safe Harbor are re-examined every 180 days to determine their compliance. If a resident is denied Safe Harbor, the resident has the right to grieve CHA's decision through the grievance process outlined in CHA's Resident's Grievance Procedure.

- Update: CHA will continue to implement the work requirement in applicable households.
- Planned Non-Significant Change: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmarks for FY2020.

Standard Metric	FY2020 Benchmark
SS-1: Increase in Household Income*	The average income from wages for households with a work-able adult subject to the work requirement will be \$15,383 (6,400 households).
SS-3: Increase in Positive Outcomes in Employment Status*	3,400 work-able PH heads of household subject to the work requirement are expected to have income from wages. <hr/> 63% of work-able PH heads of household subject to the work requirement are expected to have income from wages.
SS-4: Households Removed from TANF	Work-able households with a work-able adult subject to the work requirement receiving TANF will decrease to 680.
SS-5: Households Assisted by Services that Increase Self Sufficiency	The number of PH households with a work-able adult subject to the work requirement engaged with service providers through FamilyWorks will increase slightly to 4,315.
SS-6: Reducing Per Unit Subsidy Costs for Participating Households	The average subsidy per PH household will be \$9,014.64 (based on 13,886 eligible units).
SS-7: Increase in Agency Rental Revenue	The total contribution of households with a work-able adult subject to the work requirement will increase slightly to \$29,744,110 (6,400 households.)

SS-8: Households Transitioned to Self-Sufficiency**	The percent and number of households subject to the work requirement that have all adults in compliance will increase slightly to 47% (2,500 households). Compliance is achieved by either meeting the work requirement or obtaining an exemption from the work requirement.
HC-3: Decrease in Wait List Time	57,000 applicants on PH Family Wait Lists will have an average wait time of 40 months.

*For SS-1 and SS-3 tracking, CHA defines "work-able residents" as those age 18 to 54 who are not receiving SSI, SSDI or a pension. CHA defines "employed" based on whether income from wages is recorded in Yardi, CHA's system of record.

**For SS-8, CHA is establishing households in which all adults are compliant with the work requirement as a definition of self-sufficiency.

- **Additional Metrics:**

Additional Metric	FY2020 Benchmark
Work Requirement Compliance Status	<p>The percentages of residents in each work requirement compliance status will increase by 1%; those in Safe Harbor and Under Legal will decrease by 1%:</p> <p>52.7% compliance 15.4% exempt 24.5% Safe Harbor 5.6% non-compliant 1.8% under legal</p>

Compliant: Residents who are meeting the work requirement through authorized activities, including employment or other work experience opportunities, school/training participation or volunteer/community service opportunities.

Exempt: Residents age 55 or older or those who meet disability/caretaker or other requirements for an exemption.

Safe Harbor: Residents who are unable to comply with the work requirement may be eligible for Safe Harbor under certain circumstances, including but not limited to reasonable accommodation, temporary medical conditions, recent employment separation, and other circumstances that present barriers to finding/maintaining employment.

Non-Compliant: Non-exempt residents who are not meeting the requirement and are not approved for Safe Harbor.

Under Legal: Non-exempt residents who are undergoing eviction proceedings, whether for non-compliance with the work requirement or for any other reason.

- **Authorization:** Attachment D, Paragraph 21 of CHA's Amended and Restated MTW Agreement which gives CHA authority to implement a work requirement as a condition of tenant occupancy in public housing; Attachment C, Section D(3)(b) which allows CHA to implement resident eligibility policies from the currently mandated program requirements in the 1937 Act and its implementing regulations; and Attachment C, Section D(7)(a) for the establishment of an Agency PBV program.

* See Chapter 8 of CHA's *Admissions and Continued Occupancy Policy (ACOP)* for more detail.

Office of the Ombudsman (2008-01)

- Plan Year Approved, Implemented, Amended: Approved FY2008, Implemented FY2008
- Description: CHA established the Office of the Ombudsman in FY2008 to address the concerns of PH residents in mixed-income communities. The Ombudsman serves as a liaison between residents and CHA leadership, while providing a forum for residents to learn about the benefits and offerings in the mixed-income communities. The Ombudsman holds meetings for PH residents renting in Mixed-Income developments by region. Residents and other community members are provided an opportunity to share comments and concerns at these meetings, and comments are collected, responded to, and posted on CHA's website. The impact of this activity is that, by providing designated CHA staff to assist PH residents in mixed-income communities in resolving any PH-related issues that may arise, residents are able to adapt to their new communities.

The Office of the Ombudsman continues to address resident concerns and engage in community building activities. In FY2017, CHA rolled out support for community activities that benefited all residents living in mixed-income properties by recognizing community groups who requested assistance. We anticipate this program to further promote community activities.

- Update: The Office of the Ombudsman continues to work with families living at mixed-income properties. The focus over the years has shifted to community-building rather than solely serving as liaison between resident and property manager.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmarks for FY2020.

Standard Metric	FY2020 Benchmark
SS-5: Households Assisted by Services that Increase Self-Sufficiency	500 residents will engage through the Office of the Ombudsman.

- Additional Metrics:

Additional Metric	FY2020 Benchmark
Regional meetings to engage residents	A minimum of 4 meetings for mixed-income residents will be held.

MTW Activities Related to HCV Program***Modified Exception Payment Standards (2010-02)***

- Plan Year Approved, Implemented, Amended: Approved FY2010, Implemented FY2010, Amended FY2018, Amended FY2019
- Description: In FY2010, CHA received HUD approval to implement exception payment standards that exceed the standard limit of 110% of HUD's published Fair Market Rents (FMRs) for the City of Chicago. Currently, CHA has received approval to implement an exception payment standard in the following cases:

(1) *Reasonable Accommodations:* If CHA has approved a reasonable accommodation for households who need specific unit features related to a disability, limited to 250% FMR; or

(2) *Mobility Areas*: The family is residing in or moving into a CHA-designated Mobility Area, limited to 150%.

EPS for Reasonable Accommodations

In FY2018, CHA received approval for an amendment to this activity that increased the FMR limit to 250% in cases where it is needed as a Reasonable Accommodation for households who need specific accessibility features. Previously, CHA had requested waivers from HUD in these situations, however, this process was time consuming and burdensome for the family, and many times while approval was pending, the unit became unavailable. Research shows that units with accessibility features have significantly higher rents. Without the increase to 250% FMR, households with accessibility needs are severely limited in their housing options. The median rent for accessible units in Mobility Areas ranges from 192% of FMR (studios) to 295% (3 bedrooms). Moreover, the median minimum rents for accessible properties throughout the entire city of Chicago range from 178% to 240% of FY2017 FMR. Additionally, under the 150% FMR, households had access to less than 20% of the accessible units in these areas. The FY2018 amendment drastically expanded the housing options for these families.

In FY2019, CHA received approval to include the location of the unit as a factor in determining whether an EPS up to 250% is appropriate. In addition to specific accessibility features, residents also request approval for units with specific location features, such as proximity to a medical facility or accessible public transportation options. This amendment allowed CHA to consider this factor in unit cost when reviewing EPS requests related to reasonable accommodations.

CHA continues to review all reasonable accommodation requests for the 250% EPS, whether for specific unit accessibility features or specific location features, by completing the following process: (1) Verify through a third-party knowledgeable professional that the participant is disabled and requires the unit features or location features; (2) Confirm that the unit or location has the features needed by the disabled participant; (3) Substantiate that the participant was unable to locate a unit in a location that meets the needs of their disability within CHA's payment standard.

To complete the first step of the verification process, CHA utilizes a "certification of need" form that is completed by a knowledgeable professional. Step (2) is accomplished by contacting the property owner or manager and requesting a letter verifying the features of the unit or a layout of the unit that contains the structural features. Step (3) may be completed in various ways, including by reviewing a list of units viewed by the participant or a letter from a case manager attesting to the participant's unit search. All information received from the participant and third parties will be verified by the fair housing department.

EPS for Mobility Areas

Exception Payment Standards are part of CHA's strategy to expand housing choices for HCV participants through access to Mobility Areas throughout Chicago. In FY2018, CHA received approval to change the areas eligible for EPS from Opportunity Areas based on census tracts to Mobility Areas based on Community Areas, which significantly increased the number of areas where a voucher holder can receive an EPS, and gives them access to communities previously unavailable. Mobility Areas are defined as Community Areas with a poverty level at or below 20% and below median violent crime; or Community Areas with moderate poverty and crime plus other positive economic indicators.

All HCV rents, including rents for which an EPS might apply, are subject to a review for rent reasonableness.

- Update: CHA continues to evaluate the implementation of EPS.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: The benchmark has been updated for FY2020.

Standard Metric	FY2020 Benchmark
HC-5: Increase in Resident Mobility	3,562 households will lease in Mobility Areas with an exception payment, including new and existing leases.

HCV Vacancy Payments (2011-03)

- Plan Year Approved, Implemented, Amended: Approved FY2011, Implemented FY2012
- Description: CHA is authorized to provide a modest vacancy payment to participating owners who re-lease a unit to another HCV participant. Units are eligible to receive these payments if they pass two consecutive inspections on the first attempt. CHA will provide vacancy payments to eligible owners/units upon the execution of a new HAP contract for a re-leased unit. One-hundred percent of the previous family's HAP amount will be paid to participating owners for the vacant period not to exceed 60 days. The unit shall be deemed vacant (A) commencing on the first day for which HAP is not paid for the unit following completion of a move out or termination of the lease, and (B) ending on the day preceding the first day for which HAP is paid for such unit based on the execution of a new HAP with CHA. The purpose of this activity is to provide incentives to retain high quality owners and units in the program, and to continue to provide viable housing options for families.
- Update: As of June 2019, there were 7 vacancy payments at a total cost of \$9,600. The evaluation of this activity is ongoing and CHA will continue to review vacancy payment data to ensure the financial sustainability of this activity.
- Planned Non-Significant Changes: Previously, units participating in the Inspection Excellence Program (IEP) were eligible to receive vacancy payments. In the HCV program's marketing and communications, we are longer promoting the IEP program. Although, the specific criteria for eligibility has not changed (passing two consecutive inspections), the description of the activity no longer references IEP.
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmarks for FY2020.

Standard Metric	FY2020 Benchmark
HC-2: Units of Housing Preserved	14 units will be preserved through a vacancy payment.

Elimination of Assets in Income Calculation after Initial Eligibility for HCV Program (2017- 01)

- Plan Year Approved, Implemented, Amended: Approved FY2017, Implemented FY2017, Amended FY2019
- Description: CHA has reinstated this activity, which was previously closed out in FY2014. This activity drastically improves program efficiency and limits the burden on program participants by decreasing the amount of documentation needed. Upon implementation, the calculation of assets will only be done at intake and is no longer necessary at re-examination. Currently, asset

calculations have minimal impact on overall rent calculation and tenant portion. The impact of this activity is a reduction in staff resources and costs associated with verifying assets after initial admission.

As of June 2016, when CHA proposed reinstating this activity, approximately 29% of HCV households reported assets. Of these 10,380 households, only 6.1% (641) received income from assets that exceeded the threshold amount to impact their tenant portion. Of those, 73.6% (472) received less than \$100 annually from these assets. Since income from assets is small, eliminating asset calculations after initial eligibility will have a minimal impact on rent calculation for these households. CHA estimates that calculating assets takes roughly 20 minutes (.34 hours) during an examination for a cost of approximately \$15 per examination. In FY2015, CHA calculated assets 12,119 times and spent approximately 4,120 hours (.34 x 12,119) and \$181,785 (\$15 x 12,119). Overall, the elimination of assets after initial eligibility has minimal impact on households. In addition, CHA has reduced administrative costs by eliminating the asset calculation after the initial eligibility and participants will get the benefit of having income from assets omitted in future rent calculations. If a participant loses income from assets in between an initial examination and a re-examination, the participant may request an interim re-examination to adjust their rent calculation.

In FY2019, CHA received approval to disregard any assets below \$50,000 at initial eligibility, and to only include those that exceed this amount. When calculating income from assets, CHA now uses the actual income received using the current interest rate.

- Update: In the FY2019 MTW Annual Plan, CHA received approval from HUD to modify this activity to disregard any assets below \$50,000 at initial eligibility and this modification was implemented in early 2019. CHA continues to improve program efficiency by eliminating the majority of asset calculations needed.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: The benchmarks have been updated for FY2020.

Standard Metric	FY2020 Benchmark
CE-1 Agency Cost Savings	CHA will spend \$29,220 on calculating assets (1,948 exams x \$15).
CE-2: Staff Time Savings	CHA will spend 662 staff hours on asset calculations for all re-examination types (1,948 exams x .34 hours).

Increased Payment Standards at Interims (2018-01)

- Plan Year Approved, Implemented, Amended: Approved FY2018, Implemented FY2018
- Description: CHA has implemented an activity that applies to CHA's entire jurisdiction that allows CHA to increase payment standards at interims for elderly/disabled households and any household that receives a rent increase. Because elderly and disabled households are on a triennial reexamination schedule and other households are on a biennial reexamination schedule, the FMR used to determine their subsidy amount is outdated and does not reflect the current costs of housing in Chicago. Because there is no affordability constraint to the amount an owner can charge after the initial lease term, when an owner requests a rent increase between scheduled reexaminations, the participant is forced to make a decision between increasing their monthly rent burden or incurring expensive moving costs. This activity has enabled CHA to use the current

payment standard in effect for a given unit at an interim examination, rather than the payment standard that was in effect at the time of the participant's last regular examination. The goal of this activity is to decrease the financial burden on these households by allowing the CHA subsidy to keep pace with the market, which will decrease the number of voucher holders whose rent burden exceeds 30% of their adjusted monthly income.

- Update: CHA implemented this activity in April of 2018 and is closely monitoring its impact. Due to this activity, the percentage of tenant-based voucher holders who pay over 40% of their adjusted monthly income on rent has decreased approximately 27%, from 15% of the population when the program was implemented to 11% as of Q1 2019.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmark for FY2020.

Standard Metric	FY2020 Benchmark
SS-2 Increase in Household Savings	CHA anticipates that 1,324 participants will receive an increase in their payment standard at their interim.

Income Calculation Hardship Exemption (2018-02)

- Plan Year Approved, Implemented, Amended: Approved FY2018, Implemented FY2018, Amended FY2019
- Description: In FY2018, CHA implemented a hardship exemption for working heads of households making required child support payments that hinder their ability to pay their monthly rent portion. Prior to the implementation of this activity, these payments were not deducted from income calculations that determine the portion of rent paid by the participant, which put participants at risk of falling behind on their rent and eventually being evicted. This activity allows working heads of household who request this hardship exemption to receive a 100% deduction of their total child support payments.

In the FY2019 MTW Annual Plan, CHA received approval to expand the hardship exemption to all working adults in the household who are making required child support payments rather than just heads of household. Participants are informed of this hardship exemption via language on the application completed at intake, and during re-examinations.

- Update: In the FY2019 MTW Annual Plan, CHA received approval from HUD to expand the population eligible to participate in this activity from heads of households to all adults in the household.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A.
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmark for FY2020.

Standard Metric	FY2020 Benchmark
HC-4: Displacement Prevention	CHA anticipates that 12 participants will receive this income deduction.

MTW Activities Related to Property Rental Assistance Program/Project-Based Vouchers

Exceed the Limit of 25% Project-Based Voucher Assistance in Family Properties (2008-02)

- Plan Year Approved, Implemented, Amended: Approved FY2008, Implemented FY2008
- Description: CHA is authorized to increase the percent of assisted PBV units in certain projects above the regulatory limit of 25% per family building. CHA uses this flexibility to create innovative funding structures for PBV developments and enhance its Property Rental Assistance (PRA) Program. The impact of making PBVs available in excess of the 25% limit is that more developers are enticed to preserve or create affordable housing, increasing the availability of quality housing options throughout Chicago's communities for low-income individuals and families.
- Update: CHA will continue to identify opportunities to increase the number of PBV units in family properties with new contracts and existing contract renewals in FY2020.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmarks for FY2020.

Standard Metric	FY2020 Benchmark
HC-1: Additional Units of Housing Made Available	100 additional PBV units will be made available by exceeding 25% in family PBV properties.
HC-2: Units of Housing Preserved	0 housing units for low-income households will be preserved by exceeding 25% in family PBV properties.

PBV Contract Commitments with 21-30 Year Initial Terms (2011-05)

- Plan Year Approved, Implemented, Amended: Approved FY2011, Implemented FY2011, Amended FY2018
- Description: To facilitate the expansion of affordable housing opportunities through the use of PBVs, when originally proposed, this activity allowed CHA to enter into PBV HAP contracts for an initial term between 16 and 30 years. In light of regulatory changes, CHA was granted MTW authority to enter into contracts that have an initial term of 21-30 years. CHA's relevant contracts include a clause stating that the duration period is pursuant to CHA's MTW authorizations. The impact of this activity is that it will assist developers to obtain better financial terms and help to ensure the long-term availability of quality affordable housing.
- Update: CHA will continue to identify opportunities to increase the initial term of PBV HAP contracts to 21-30 years in FY2020.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmarks for FY2020.

Standard Metric	FY2020 Benchmark
HC-1: Additional Units of Housing Made Available	125 PBV units will be made available with 21-30 year contracts

HC-2: Units of Housing Preserved	110 PBV units will be made available with 21-30 year contracts
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Acceptance of City Certificates of Occupancy for Initial PRA Inspections (2011-06)

- Plan Year Approved, Implemented, Amended: Approved FY2011, Implemented FY2011
- Description: For the PRA Program, CHA reduces the number of inspections required prior to lease-up of PBV developments that are new construction or substantial rehabilitation. In cases involving such properties, CHA considers the Certificate of Occupancy issued by the City of Chicago as evidence of the property's compliance with Housing Quality Standards (HQS). CHA will not perform initial inspections on such units prior to entering into the PRA HAP contracts. The impact of this activity is to reduce costs by reducing the number of inspections conducted by staff, as well as the associated tenant inconvenience in developments that have additional governmental funding such as tax credits and state-financed loans.
- Update: In FY2020, CHA plans to save approximately \$5,832 and 163 staff hours on initial PRA inspections for 177 units that are new construction or require substantial rehab by using the City of Chicago Certificate of Occupancy as evidence of HQS compliance.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmarks for 2020.

Standard Metric	FY2020 Benchmark
CE-1: Agency Cost Savings	CHA will spend \$0 on initial PRA inspections. (0 units x \$32.95 per inspection) for new construction and substantial rehab units.
CE-2: Staff Time Savings	0 hours of staff time will be dedicated to initial PRA inspections for new construction and substantial rehab units. (0 units x .92 hours)

Payments during Initial Occupancy/Leasing for New Construction and Substantially Rehabilitated Properties (2011-08)

- Plan Year Approved, Implemented, Amended: Approved FY2011, Implemented FY2012
- Description: To provide an incentive for participation in CHA's PRA Program and to ensure the long-term viability of newly-constructed and substantially-rehabilitated properties, CHA provides vacancy payments, as determined necessary on a project-by-project basis, during the initial operating lease-up period. Such an approach is consistent with practices in the affordable housing industry (e.g., initial operating reserve for tax-credit properties, provision of operating subsidy for mixed-finance and PH properties, and allowable vacancy payments from execution of contract to initial occupancy in the Moderate Rehabilitation Program). These payments allow new developments to maintain a positive cash position in meeting operating expenses when all of the PBV units are not leased.

CHA is authorized to make payments for a period not to exceed 90 days from the execution of the HAP contract. These vacancy payments are equal to 50% of the contract rent for the initial 60 days of the vacancy. CHA may determine that there is a reasonable opportunity to refer an applicant from its waiting list and may elect to pay an additional vacancy payment of 100% of the contract rent for the additional 30 days. Under no circumstances will the vacancy payments exceed the 90-day period. Payments are contingent on the owner demonstrating compliance with program

rules, including taking all feasible actions to fill the vacancies and not rejecting eligible applicants except for good cause acceptable to CHA. Further, CHA does not compensate landlords for units that receive funding from another source.

- Update: In FY2020, CHA plans to spend approximately \$15,000 in payments during initial occupancy/leasing for new construction and substantially rehabilitated properties. These vacancy payments are equal to 50% of the contract rent for up to the initial 60 days of the contract.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmark for FY2020.

Standard Metric	FY2020 Benchmark
HC-1: Additional Units of Housing Made Available	30 PBV units will be made available through vacancy payments during initial leasing periods.

Single HAP for Non-Contiguous PBV Properties with Same Owner (2019-01)

- Plan Year Approved, Implemented, Amended:
- Description: This activity allows CHA to use a single HAP contract for PBV units under the same ownership entity and located in buildings of 4 or more units that are not contiguous. HUD regulations currently require a separate HAP for every “project” with “project” defined as “a single building, multiple contiguous buildings, or multiple buildings on contiguous parcels of land.” Each site within the defined project will continue to meet all HUD requirements, including environmental clearance and subsidy layering review. This activity reduces the administrative burden on CHA to create and manage multiple HAPs for projects with the same owner in which the units are spread across separate properties. This activity also enhances CHA’s ability to facilitate housing in communities that have traditionally been underserved, many of which are residential communities containing 2 - 4 unit buildings.
- Update: In FY2020, CHA will save approximately \$57,000 through this activity by managing 8 HAPs that contain 166 PBV units in 65 buildings at a cost of \$8,000 and 80 staff hours vs. 65 HAPs at a cost of \$65,000 (650 staff hours x \$100) and 650 staff hours (65 HAPs x 10 hours).
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmark for FY2020.

Standard Metric	FY2020 Benchmark
CE-1: Agency Cost Savings	It will cost CHA \$8,000 to manage 8 HAPs at 65 developments (80 staff hours X \$100)
CE-2: Staff Time Savings	CHA will spend 80 staff hours managing 8 HAPs at 65 developments. (8 HAPs X 10 hours)

Expansion of Public Housing Earned Income Disallowance Policy to CHA RAD Properties (2016-03)

- Plan Year Approved, Implemented, Amended: Approved FY2016, Implemented FY2017

- **Description:** CHA is participating in the Rental Assistance Demonstration (RAD) Program and is working to transition more than 10,000 PH units to PBVs through RAD. As part of the RAD program, regulations state that the Earned Income Disregard (EID) policy is only available to residents with disabilities, in accordance with regulations for the HCV Program. For PH sites transitioning to RAD, CHA will retain the EID policy for residents in RAD PBV units, which will allow any eligible resident, including non-disabled persons, to have the opportunity to utilize EID.
- **Update:** CHA implemented this activity in FY2017 and implementation will be ongoing through FY2020.
- **Planned Non-Significant Changes:** N/A
- **Planned Significant Changes:** N/A
- **Planned Changes to Metrics/Data Collection:** CHA updated the benchmarks for FY2020.

Standard Metric	FY2020 Benchmark
SS-1: Increase in Household Income*	The average income from wages for households at former PH sites converted to RAD PBV properties with a work-able adult will be \$15,180 (215 households).
SS-3: Increase in Positive Outcomes in Employment Status*	85 work-able heads of household at former PH sites converted to RAD PBV properties will have income from wages. 61% of work-able heads of household at former PH sites converted to RAD PBV properties will have income from wages.

*For SS-1 and SS-3 tracking, CHA defines "work-able residents" as those age 18 to 54 who are not receiving SSI, SSDI or a pension. CHA defines "employed" based on whether income from wages is recorded in Yardi, CHA's system of record.

**RAD conversions are currently take place at primarily senior properties.

Uniform Physical Condition Standards (UPCS) Inspection Standards for PBV Properties within the RAD Program (2016-04)

- **Plan Year Approved, Implemented, Amended:** Approved FY2016, Implemented FY2017
- **Description:** As a participant in the RAD program, CHA is evaluating administrative processes to better streamline the agency's role as Contract Administrator for the program. One primary responsibility of the Contract Administrator is to conduct inspections to ensure RAD PBV units and buildings meet HUD standards. For RAD and the HCV Program, HUD requires HQS inspections. CHA requested authorization to continue utilizing PH Uniform Physical Condition Standards (UPCS) for inspections in CHA PH properties/units transitioning to PBV properties under the RAD program, including RAD PBV transfer of assistance sites. CHA proposed to retain the UPCS inspection criterion because it is considered a more stringent set of standards for inspections when compared to HQS, therefore ensuring a better housing product. In addition, CHA anticipates this activity will be cost effective.
- **Update:** CHA implemented this activity in FY2017 and implementation will be ongoing through FY2020.
- **Planned Non-Significant Changes:** N/A

- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmark for FY2020.

Standard Metric	FY2020 Benchmark
CE-1: Agency Cost Savings	CHA anticipates spending approximately \$200,000 on inspections in sites transitioning to RAD PBV.

Adjusting Fair Market Rent (FMR) Thresholds to Retain Existing Subsidy Levels for Converting to PBV Properties within the RAD Program (2016-06)

- Plan Year Approved, Implemented, Amended: Approved FY2016, Implemented FY2017
- Description: In an effort to retain consistent housing quality and services across the PBV RAD portfolio of RAD properties, CHA requested authorization to exceed the FMR cap of 110% for RAD PBV properties (under current standard PBV rules), as needed to retain the subsidy level CHA currently receives for properties. FMR is one of three criteria used to set initial contract rents under the RAD program – the other two criteria are current subsidy levels and reasonable (market) rents; the lower of the three applies. In FY2018, CHA conducted an initial contract rent analysis using the aforementioned criteria. Of the 38 senior properties analyzed, all 38 were negatively impacted by the 110% of FMR cap imposed by current PBV rules. Further, 9 properties are also negatively impacted by a 120% of FMR cap.

CHA has made a commitment to, at minimum, retain existing services and property maintenance at the level residents experience today. Accordingly, CHA received approval to increase the cap from 110% to 150% of FMR to better safeguard the impacted CHA communities against a reduction in funds that could impact operations, service levels, and appropriate capital investments. As RAD was designed by HUD to be a budget-neutral program to preserve subsidized housing, this flexibility allows CHA to retain current subsidy levels and maintain current standards for operating RAD PBV sites. Further, the requested increase to up to 150% of FMR is consistent with the exception payment standard for the HCV Program.

CHA prepared an updated initial contract rent analysis for FY2018 that demonstrated that 38 senior properties would be negatively impacted by a RAD Conversion subject to the FMR cap of 110% for RAD PBV properties, and thus unable to retain current subsidy levels. The changes in the benchmark reflects the combination of annual contract rent increase associated with the Operating Cost Adjustment Factor (OCAF) and anticipated changes to the unit count and contract rent at Covered Projects that would retain the Per-Unit Monthly (PUM) funding associated with non-dwelling/special purpose units.

- Update: CHA implemented this activity in FY2017 and implementation is ongoing throughout FY2020.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmark for FY2020.

Standard Metric	FY2020 Benchmark
HC-2: Units of Housing Preserve	4,252 dwelling units at 15 impacted properties transitioning to RAD required an increased FMR

	threshold to maintain current standards for property operations.
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MTW Activities Related to Local Programs

Funding for City of Chicago Housing Assistance Programs (2017-04)

- Plan Year Approved, Implemented, Amended: Approved FY2017, Implemented FY2018
- Description: To further coordinate with the City of Chicago, Chicago's Continuum of Care and Coordinated Entry System, CHA is participating in what has been named the Flexible Housing Subsidy program, which will provide collective impact to individuals and families who experience homelessness and are in critical need of immediate housing. CHA is utilizing its single fund flexibility to contribute to the fund in order to increase housing options for those in need to access and remain stably-housed.

This program will be coordinated with the City of Chicago where CHA would contribute a specified amount of money to be pooled with other sources (e.g. hospitals, ESG, etc) to create a collective solution to housing persons experiencing homelessness. Examples of target populations would include families who experience homelessness or who are at risk of becoming homeless, transitional-aged youth, survivors of domestic violence, homeless veterans and other vulnerable populations that are a priority for the City of Chicago. Funds would be used for bridge rental assistance, rent arrearages with a current landlord, move-in fees and deposits, and subsidized housing. CHA anticipates allocating approximately \$800,000 towards this program.

- Update: The Center for Health and Housing was selected to be the 3rd party administrator. The program is now underway with 35 enrolled and 5 housed. The program specifically targets persons experiencing chronic homelessness who are also frequent users of emergency rooms. While currently receiving funding from CHA and the City of Chicago, the program hopes to expand through funding by hospitals.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmarks for FY2020.

Standard Metric	FY2020 Benchmark
CE-4: Increase in Resources Leveraged	\$1 million in funds will be leveraged by DFSS and DPD.
SS-5: Households Assisted by Services that Increase Self Sufficiency	50 households will receive services.
SS-8: Households Transitioned to Self Sufficiency	50 participants will transition to self-sufficiency by becoming housed.
HC-1: Increasing housing choice	50 units of housing will be made available through CHA funding assistance for this program.
HC-7: Households Assisted by Services that Increase Housing Choice	50 participants will receive social services that increase housing choice.

Approved and Implemented MTW Activities in FY2020

Housing and Development

MTW Activity Number	Ongoing MTW Activity	Description	Statutory Objective	Authorization
2000-01	Revitalization of 25,000 Units	CHA continues to make progress toward the goal of 25,000 housing units and providing additional housing opportunities for residents.	Increase Housing Options	Attachment D, Paragraph 1 and MTW Agreement, Amendment 3
2010-01	Alternative Reasonable Cost Formula for Redevelopment and Rehabilitation	HUD approved the reasonable cost formula for redevelopment in FY2010. CHA utilizes the reasonable cost formula for both redevelopment and rehabilitation projects.	Increase Housing Options	Attachment C, Section C (16)
2015-01	Expedited Public Housing Unit Acquisition	CHA is authorized to use MTW flexibility to support CHA's Real Estate Acquisition Program and to expedite the acquisition of units and/or buildings as PH units in CHA-designated Opportunity Areas as well as Gautreaux-designated General and Revitalizing Areas.	Increase Housing Options	Attachment C, Section C (13); Attachment C, Section B2

Public Housing and HCV

MTW Activity Number	Ongoing MTW Activity	Description	Statutory Objective	Authorization
2009-01	\$75 Minimum Rent for Public Housing and HCV Programs	CHA increased the minimum rent from \$50 to \$75 in FY2009.	Reduce Costs and Cost Effectiveness	Attachment C, Section C (11) and Attachment C, Section D(2)
2011-01	Choose to Own Homeownership Program for Public Housing and HCV	CHA expanded the Choose to Own (CTO) Home Ownership Program beyond HCV participants to current CHA PH residents.	Increase Housing Options Self-Sufficiency	Attachment C, Section B, Paragraph 1(b)(iii), and Attachment C, Section D, Paragraph 8 (a-b)
2014-01	Modified Family Self-Sufficiency Program for HCV and Public Housing Participants	The modified program encourages participants to remain engaged, obtain escrow, and achieve consistent employment so they are better prepared for economic self-sufficiency upon graduation	Self Sufficiency	Attachment C, Section E
2014-02	Triennial Re-examinations for Households with only Elderly/Disabled Participants and Fixed Income	CHA implemented a streamlined triennial re-examination schedule for PH and HCV fixed income households consisting of only elderly and/or disabled participants.	Reduce Costs and Cost Effectiveness	Attachment C, Section C (4) and Attachment C, Section D (1)(c)
2014-04	CHA Re-Entry Pilot Program	CHA received HUD approval to implement a Re-entry Pilot Program for up to 50 eligible participants in CHA traditional PH or CHA's HCV Program.	Increase Housing Options	Attachment C, Section B(4)
2006-01, 2014-03	Biennial Re-examinations	CHA plans to implement biennial re-examinations for PH residents and will continue to implement biennial re-examinations for HCV program participants	Reduce Costs and Cost Effectiveness	Attachment C, Section D (1) (c), and Section C (4)

2016-02	Mobility Counseling Demonstration Program Work Requirement	CHA has implemented a work requirement for applicants who consent to participation in the Mobility Counseling Demonstration Program and move to either a CHA Opportunity or Gautreaux-designated General Area utilizing a tenant-based HCV.	Self-Sufficiency	Attachment C, Section D(3)(b)
Public Housing				
MTW Activity Number	Ongoing MTW Activity	Description	Statutory Objective	Authorization
2009-02	Public Housing Work Requirement	CHA implemented a work requirement across CHA's PH portfolio. CHA provides case management and workforce development resources to residents to assist them in fulfilling this requirement.	Self-Sufficiency	Attachment D, Paragraph 21
2008-01	Office of the Ombudsman	The Office of Ombudsman provides designated staff to address the concerns of PH residents living in mixed-income communities and serves as a liaison between residents and CHA leadership.	Self-Sufficiency	Attachment D, Paragraph 20
HCV				
MTW Activity Number	Ongoing MTW Activity	Description	Statutory Objective	Authorization
2010-02	Exception Payment Standards	CHA is authorized to apply EPS that may be up to 150% of HUD's published FMRs for the City of Chicago in order to increase housing options in mobility areas throughout Chicago.	Increase Housing Options	Attachment C, Section D(2)
2011-03	HCV Vacancy Payments	As part of the HCV Owner Excellence Program, CHA may provide a modest vacancy payment to eligible owners participating in the Owner Excellence Program who re-lease a unit currently in the HCV program to another HCV participant.	Increase Housing Options	Attachment C, Section D(1)(d)
2017-01	Elimination of Assets in Income Calculation after Initial Eligibility	The calculation of assets will only be done at intake and is no longer necessary at re-examination.	Reduce Costs and Cost Effectiveness	Attachment C, Section D(1)(c) and Attachment C, Section D (3)(b)
2017-02	Incentive Payments for Landlords	CHA will provide a one-time incentive payment in the amount of the contract rent to landlords in any instance where an HCV participant is entering into a new lease for a unit located in a mobility area.	Increase Housing Options	Amendment 6
2018-01	Increased Payment Standards at Interims	CHA has implemented an activity to increase payment standards at interims for elderly/disabled households and others who receive a rent increase.	Increase Housing Options	Attachment C, Section D (2)(a)

PBV				
MTW Activity Number	Ongoing MTW Activity	Description	Statutory Objective	Authorization
2008-02	Exceed the Limit of 25% Project-Based Voucher Assistance in Family Properties	CHA may increase the percent of assisted PBV units in certain projects above the regulatory limit of 25% per family building.	Increase Housing Options	Attachment D, Paragraph 6
2011-05	PBV Contract Commitments with 21-30 Year Initial Terms	To facilitate the expansion of affordable housing opportunities through the use of PBVs, CHA uses MTW authority to enter into HAP contracts for initial terms between 21-30 years.	Increase Housing Options	Attachment C, Section D (1)(a)
2011-06	Acceptance of City Certificates of Occupancy for Initial PRA Inspections	CHA is authorized to accept the issuance of Certificate of Occupancy by the City of Chicago as evidence of the property's compliance with HQS for initial PRA inspections.	Reduce Costs and Cost Effectiveness	Attachment C, Section D(7)(d)
2011-08	Payments During Initial Occupancy/Leasing - New Construction and Substantially Rehabilitated Properties	CHA provides vacancy payments, as determined necessary on a project by project basis, during the initial operating lease-up period in order to provide an incentive for owner participation and to ensure the long-term viability of newly constructed and substantially rehabilitated properties.	Increase Housing Options	MTW Agreement, Amendment 6
2016-03	Expansion of Public Housing Earned Income Disallowance Policy to CHA PBV Programs within the RAD Program	CHA will retain the PH EID policy for residents in properties transitioning to RAD PBV.	Self-Sufficiency	Attachment C, Section D(2)(a)
2016-04	UPCS Inspection Standards for PBV Properties within the RAD Program	CHA will continue utilizing UPCS for inspections in properties transitioning to RAD PBV.	Reduce Costs and Cost Effectiveness	Attachment C, Section D(7)(d)
2016-06	Adjusting FMR Thresholds to Retain Existing Subsidy Levels for Converting to PBV Properties within the RAD Program	CHA may exceed the FMR cap of 110% for RAD PBV properties, as needed, to retain existing subsidy levels.	Increase Housing Options	Attachment C, Section D(2)(a)
Local Programs				
2017-04	Funding for City of Chicago Housing Assistance Programs	CHA will implement program-based assistance using its single fund flexibility to help families access and remain stably housed.	Increase Housing Options	Amendment 6

Section IVB. Not Yet Implemented Activities

N/A

Section IVC. Activities on Hold

Owner Excellence - Acceptance of Passed Annual or Initial HQS Inspection for New Request for Tenancy Approval within 90 Days of Passed Date (2011-02)

- Plan Year Approved, Implemented, Amended: Approved FY2011, Implemented FY2012
- Description: As part of the HCV Inspection Excellence Program (formerly the Owner Excellence Program), and for units with an IEP (formerly UEP) designation only, CHA is authorized to approve tenancy for a unit that passed inspection within the previous 90 calendar days without conducting a new inspection for each Request for Tenancy Approval (RTA) received. The purpose of this activity is to provide incentives to retain high quality owners and units, to continue to provide viable housing options for HCV participants and achieve cost and time savings.

In response to the small number of units which utilized this benefit, CHA decided to place this activity on hold in FY2016. Since then, CHA has modified IEP and drastically increased the number of units that can potentially qualify for this benefit, among other benefits offered by the new program. CHA's new IEP provides benefits to units that pass two consecutive, regularly scheduled inspections. Such benefits include biennial inspections for certain units and a landlord's ability to self-certify minor fail items. The response to this program has been overwhelmingly positive and the number of units that qualify for benefits continues to grow. Previously, the number of units that had the ability to receive benefits under this MTW Activity was fewer than 2,000.

- Update: This activity was reinstated in the FY2018 MTW Annual Plan. However, due to the administrative challenge of establishing a mechanism to identify units eligible and ensure compliance CHA proposes to close this activity.
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- Planned Non-Significant Changes: N /A
- Planned Significant Changes: For the reasons outlined above, CHA will close this activity in the FY2019 MTW Annual Report.
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmarks for FY2020.

Standard Metric	2020 Benchmark
HC-5 Increase in Resident Mobility	N/A
CE-1: Agency Cost Savings	N/A
CE-2: Staff Time Savings	N/A

Section IVD. Closed Out Activities

Time Limit Demonstration Program for Housing Choice Voucher Participants (2017- 03)

- Description: CHA proposed to implement an eight-year time limit demonstration program for a total of 100 families. After eight years, participants who have not reached a zero HAP may be eligible for a two-year extension for a total of 10 years. Elderly and disabled are excluded from this demonstration program. In reviewing existing population data, CHA has determined that there is sufficient evidence that the wait list population is a representative sample to test this demonstration program. A review of the current HCV population found that most HCV households

remain on the subsidy for an average of ten years. Furthermore, a review of FY2013 CHA Family Self Sufficiency Program (FSS) graduates has found that 67% of graduates have higher incomes than non-FSS households, with an average income increase of \$16,495 post enrollment in the FSS program.

Through the demonstration program, CHA proposed that 50 families are to be selected from the HCV wait list, with an AMI between 0% - 50% for participation (Group 1). As a condition of receiving the voucher, these 50 families will be required to participate in the CHA FSS program, and will be required to receive case management services from the FSS service provider. All HCV FSS rules and regulations apply, including the requirement of participants to be continuously employed for at least 12 months, all household members must be free of welfare assistance prior to program completion, mandatory attendance at financial literacy sessions, and engagement with the FSS service provider in a face-to-face meeting at least once per year. Noncompliance with the FSS program will be reviewed by the HCV department and the participant's FSS coordinator, and may result in a capped HAP payment. The participant will not be required to give up the subsidy.

The remaining 50 families would have been selected from the HCV wait list, with an AMI between 51% - 80% for participation (Group 2). As a condition of receiving the voucher, these 50 families will be required to participate in case management services from CHA FamilyWorks providers. Services will be aimed at increasing self-sufficiency so that families can successfully transition off the subsidy. These services include, but are not limited to, workforce development training and placement, education, financial literacy, and mental health case management resources. Group 2 will be subject to CHA's work requirement. CHA will utilize the same work requirement policies in effect for Public Housing, including Safe Harbor. CHA's work requirement applies to adult members age 18 to age 54, or age 17 and not attending school full time. Applicable adult members are required to be engaged in employment or employment-related activities for, at least, 20 hours per week, unless the resident is eligible for an exemption or granted Safe Harbor. Noncompliance with the work requirement will be reviewed by the HCV department and the participant's FamilyWorks provider, and may result in a capped HAP payment. The participant will not be required to give up the subsidy.

The 100 families (Group 1 and 2) will be allowed to access a voucher through a priority preference as demonstration program participants, thereby accessing a voucher more quickly than if the wait list applicants were not selected for the demonstration program. While the final details will be determined in coordination with the HCV Participant Council, this will be achieved by sending out a letter notifying wait list participants about the demonstration program and an invitation to apply should they fit into the requirement of either group 1 or 2. The letters will be sent to the lower 50% of the wait list to create an additional incentive for participation, but may be sent in application order pending agreement with the Participant Council. Letters that are sent will detail the demonstration program and wait list holders will be invited to submit interest via telephone or email. There will be no adverse impact to wait list holders who are non-responsive. Interest in the demonstration program will be taken in response order for each of the two groups (prospective participants would be required to supply income information) and placed on a Demonstration Wait list, with sub lists for Groups 1 and 2. It is anticipated that CHA will over recruit and wait list holders who ultimately are not selected for enrollment will return to the HCV wait list in their previous order. CHA will require that all Participants in the program meet all of the regular HCV admissions requirements. Those not meeting the HCV Admission criteria will be removed from the demonstration and HCV wait lists. To the extent possible, each group will receive orientation and briefings with their respective group all at once and go through the demonstration as two cohorts. Demonstration participants would be subject to portability restrictions and will be required to remain in Chicago. Participants may, however, dual enroll in CHA's Mobility Counseling Program

should they choose to move to a Mobility Area. Participants will also be allowed to enroll in CHA's CTO Program and purchase a home within the 10-year time period. Doing so would be treated as a positive exit from the program. Participants in Group 2 would be allowed to enroll in CHA's FSS program, although unlikely.

In order to evaluate the impacts of this demonstration program, CHA will issue an RFP to conduct research to determine the outcomes of the 10-year time limit.

Overall, the time limit demonstration program will increase housing choice through time limits, allowing the CHA to offer housing assistance to additional families on the wait list and reduce wait list times. The goal of the demonstration program is to increase family self-sufficiency through an assessment of family needs, development of service plans, assistance with self-sufficiency activities and an incentivized escrow savings plan that will allow families to fully transition off the housing subsidy after eight or 10 years.

- Implementation Year: approved in FY2017
- Statutory Objective: MTW Statutory Objective I: Increase housing choices for low-income families. MTW Statutory Objective II: Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
- Hardship Policy: A participant may request that their case be reviewed by a Hardship Panel if they have extenuating circumstances supporting a continuation of housing assistance beyond the eight-year period for an additional two years, for a total of 10 years. The three-person Hardship Panel is comprised of (1) A Representative from the HCV Participant Council (2) A Representative from the HCV Program (3) A non-CHA Representative, either the assigned FamilyWorks Provider or FSS Provider. Requests to have cases reviewed by the Hardship Panel must be made at least six months prior to the end of participation in the demonstration program during the eighth year. All recommendations made by the Hardship Panel will be forwarded to the HCV Administrator for review. Extenuating circumstances that may be considered include:
 - Health and/or medical issues;
 - Employment/unemployment/or under-employment issues;
 - Past performance of participant and adherence to Demonstration program requirements;
 - Previous participation in CHA-sponsored or referred services and/or programs; and
 - Other extenuating circumstances.

After the 10-year period, demonstration program participants who have not successfully reached a zero HAP payment to transition off the subsidy will have their HAP payment capped. The CHA will not increase the HAP at any time after the 10 years, however the participant will not be required to give up the subsidy. This policy will allow participants to continue on the path towards self-sufficiency by freezing HAP payments until the participant reaches a zero HAP. Past program participants, who receive a capped HAP, may also request a hardship due to loss of employment for a 6-month period, approved by the panel.

- Update: After consideration of this activity and local housing needs, CHA closed out this activity in the FY2018 MTW Annual Report, and will explore other activities in the future if warranted by data. Currently the average time in the HCV program is eight years for participants who leave the HCV program, which is aligned with the proposed program, thus making the case to close this activity.



5

Section Five

MTW SOURCES AND USES OF FUNDS



CHICAGO HOUSING
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Section V: MTW Sources and Uses of Funds

This section contains information on CHA's anticipated sources and uses of funding in FY2020.

Section VA: Sources and Uses of MTW Funds

Estimated Sources of MTW Funding for FY2020

The following table shows projected sources of MTW funding in FY2020:

Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$56,143,222
70600	HUD PHA Operating Grants	\$984,693,496
70610	Capital Grants	\$47,048,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$6,767,771
71100+72000	Interest Income	\$1,750,000
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$6,193,907
70000	Total Revenue	\$1,102,596,396

Explanations of CHA FY2020 MTW Sources:

- FY2020 estimates for operating subsidies are based on units in PIC at projected per unit rates and HCV Program sources are based on projected FY2020 voucher counts. CHA continues to finalize MTW HCV leasing projections for FY2020.

Estimated Uses of MTW Funding for FY2020

The following table shows projected uses of MTW funding in FY2020:

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$82,911,705
91300+91310+92000	Management Fee Expense	\$0
91810	Allocated Overhead	\$52,621,044
92500 (92100+92200+92300+92400)	Total Tenant Services	\$41,511,343
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$22,408,861
93500+93700	Labor	\$0

94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$137,464,861
95000 (95100+95200+95300+95500)	Total Protective Services	\$35,542,851
96100 (96110+96120+96130+96140)	Total insurance Premiums	\$6,537,000
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$8,916,560
96700 (96710+96720+96730)*	Total Interest Expense and Amortization Cost	\$14,888,690
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	Housing Assistance Payments + HAP Portability-In	\$523,358,193
97400	Depreciation Expense	\$92,006,306
97500+97600+97700+97800	All Other Expenses	\$1,180,000
90000	Total Expenses	\$1,019,346,630

*This includes estimated interest expense on general obligation bonds issued by CHA in FY2018.

Explanations of CHA FY2020 MTW Uses

- The estimated Housing Assistance Payments expense is based on 90% voucher utilization in FY2020. CHA continues to finalize MTW HCV leasing projections for FY2020.
- Interest income is derived from the Cash and Cash Equivalents and the Investments at Fair Value as presented on the Statement of Net Position in CHA's Comprehensive Annual Financial Report.
- Uses do not reflect planned capital expenditures described in Section II. These are not reported as FDS line items.
- Depreciation is included in Uses based on the FDS line item. CHA reports depreciation as an expense (rather than a use), per standard accounting practices.
- In FY2018, CHA issued general obligation bonds in the amount of \$325 million. A portion of those proceeds, \$77 million, is budgeted to fund capital projects in FY2020.
 - Bond proceeds will be used to pay for the costs of projects that are subject to the Authority's MTW Agreement, so long as the use is included in an approved Annual MTW Plan.
 - Anticipated uses include public housing modernization, public housing construction and project-based voucher development.
 - A portion of the bond proceeds has been escrowed to make initial debt service payments.
 - CHA will repay the bonds using HCV administrative fees based on a 20-year amortization schedule.
 - CHA will continue to provide HUD with information regarding bond uses and repayment in MTW Annual Reports and Plans.
- CHA plans to fill the projected gap between Estimated Total Revenue and Estimated Total Expenses by using third-party financing.

Reconciliation to CHA's 2020 Preliminary Budget

Total Expenses	\$1,019,346,630
Add back: Depreciation	(\$92,006,306)
Deduct: Capital Expenditures	\$161,659,000
Principal	\$13,715,000
Total Expenses	\$1,102,714,324
Use of Third-Party Financing	\$117,928,000

Activities that Use Only MTW Single-Fund Flexibility

The following section describes CHA's use of MTW single-fund flexibility.

Describe the Activities that Used Only MTW Single Fund Flexibility

The table below outlines CHA's use of the MTW single fund for FY2020, with projected expenditures by category based on CHA's FY2020 budget.

CHA continues to use single fund flexibility by designing and/or continuing to implement local activities, including new initiatives described in Section I.

CHA uses capital dollars as well as Section 8 MTW Block Vouchers from the single fund to support ongoing revitalization activities, in an effort to further advance the progress of the original Plan and implement applicable new initiatives. Section II describes capital expenditures and specific development and capital activities planned for FY2020.

Through the use of MTW funds, CHA also continues to implement numerous resident services initiatives including Support to Families Being Relocated, Self-Sufficiency Services, Youth Empowerment Services and Quality of Life Services. (More detail on resident services initiatives is provided in the section below.)

**THE CHICAGO HOUSING AUTHORITY
USE of MTW SINGLE FUND
FY2020 ANNUAL PLAN**

	<u>FY2020 Single Fund</u>
CENTRAL OFFICE	\$ 61,049,372
 <u>HOUSING</u>	
Housing Choice Voucher	538,608,057
Property Office	227,396,803
Resident Services	43,679,536
TOTAL HOUSING	809,684,396
 <u>CAPITAL</u>	
Capital Repairs and Improvements	45,752,794
Capital Development	3,059,720
Capital Construction	7,068,551
TOTAL CAPITAL	55,881,065
 DEBT SERVICE	 28,603,690
 TOTAL USES	 \$ 955,218,523

Current Support to Families in the Process of Being Relocated

CHA provides a variety of support options to families in the process of being relocated from buildings undergoing rehabilitation or redevelopment. In accordance with the Relocation Rights Contract (RRC), CHA provides relocation notices to families impacted by building closures or consolidation and makes move-related payments. Additionally, as applicable, residents are offered pre-move counseling, HCV mobility counseling, post-move counseling, unit tours, assistance in accessing other necessary services and support for residents in managing their households and adjusting to new communities. CHA also provides packing materials and moving assistance to families who are relocating.

Projected FY2020 Outcomes: CHA will continue to provide relocation assistance to all residents requesting it under the RRC.

Support Services for Families

CHA currently offers PH families living in CHA properties or temporarily utilizing an HCV a variety of case management and workforce development services, as well as select services to other HCV residents. These services focus on four main goals, each with measurable outcomes, including permanent housing choices, lease compliance, and employment preparation, placement and retention. A summary of the services planned for 2020 is below.

Economic Independence:

- *Transition counseling.* Assistance for families to overcome social and emotional barriers to leaving subsidized housing.
- *Housing locator assistance.* Help finding appropriate, affordable housing in the private or affordable market for families transitioning off subsidy or moving to a Mobility Area.
- *Choose to Own Homeownership Program.* Financial assistance toward the mortgage payment, pre- and post-purchase homebuyer education, credit counseling and other services to help families navigate the home-buying process.
- *Family Self-Sufficiency program.* Focused assistance in reaching self-sufficiency goals, including escrow accumulation.

Projected FY2020 Outcomes:

- 30 families will purchase a home through the CHA CTO Homeownership Program.
- 80% of participants in the Family Self-Sufficiency program will accumulate escrow.

Earning Power:

- *Employment placements.* Job readiness training to prepare residents for work; assistance finding a job; follow-up to foster, promote, and enhance job retention.
- *Transitional Jobs.* Time-limited, subsidized jobs with a training component to help residents transition to permanent employment.
- *Employment readiness and placement for youth.* Starting in elementary school, career exploration programming. For older youth, job readiness training and summer placements with ongoing support.

Projected FY2020 Outcomes:

- 1,000 residents will be connected with new and better jobs.
- At least 2,500 youth will be engaged in paid summer opportunities.

Academic Achievement:

- *Connections to education.* Coaching and support in accessing post-secondary education, including at the City Colleges of Chicago, where residents can attend at no cost after financial aid.
- *Scholarships.* CHA offers scholarships in amounts of \$1,000 and \$2,500 for youth and adults attending college.
- *Academic enrichment for youth.* Programs for middle school- and high school- aged youth to expand academic skills and prevent summer learning loss with the goal of preparing youth for college or other post-secondary education.

Projected FY2020 Outcomes:

- More than 500 residents will attend the City Colleges of Chicago.
- At least 220 youth and adults will receive CHA college scholarships.

Stability and Quality of Life:

- *Recreational programming for youth.* Sports, wellness and arts programs for youth starting at age six, including through the Chicago Park District, as well as special events throughout the year.
- *Lease violation referrals.* Assistance for families referred by their property manager to help them address lease violation issues.
- *Right of Return outreach.* Outreach and assistance for 10/1/99 families who still need to satisfy their Right of Return under the RRC.

- *Clinical mental health services.* Individual and group counseling for any resident who needs these services.
- *Victim Assistance.* Referral to counseling services and, if appropriate, relocation for residents who have been victims of violent crimes or trauma and who need to move for safety reasons.
- *Health initiatives.* Opportunities with CHA partners to address specific health issues such as asthma and cardiovascular health. For seniors, exercise and dance classes, health seminars, frail and emergency well-being checks, and crisis intervention.
- *Social events for seniors.* On-site, regional and city-wide activities such as clubs, classes, field trips and music events.
- *Assessments and outreach for seniors.* Ongoing one-on-one contact with seniors to identify and address issues and engage them in activities.
- *Senior referrals.* Connections to outside resources, such as assistance getting benefits, housekeeping services and transportation assistance. Many services are provided by the City of Chicago’s Department of Family and Support Services (DFSS).

Projected FY2020 Outcomes:

- 7,000 youth will be engaged in out-of-school-time programming.
- 80% of lease compliance referrals will be resolved.
- 190,000 Golden Diner and 60,000 Summer Food meals will be served to seniors and youth.
- Percent of families with Right of Return outstanding will decrease to 2.0%.
- Regional senior music fests and the Senior Holiday Luncheon will engage more than 2,000 seniors.

CHA Reserves

CHA does not have an excess reserves above HUD recommendations and no reserve fund use is budgeted for FY2020.

Section VB: Local Asset Management Plan

Local Asset Management Plan	
Has the PHA allocated costs within statute during the plan year?	No
Has the PHA implemented a local asset management plan (LAMP)?	Yes
<p>If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. It shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.</p>	
Has the PHA provided a LAMP in the appendix?	Yes
<div style="border: 1px solid black; padding: 10px;"> <p>CHA implemented a Local Asset Management Plan (LAMP) in FY2008 and, though the basic components of the plan have not changed materially, CHA continually looks to ensure that the activities, accounting, and financial reporting are in keeping with the LAMP. Examples of CHA activities taken to ensure our LAMP is operating as designed include:</p> <ul style="list-style-type: none"> • The CHA property portfolio continues to be managed by professional private management companies with performance metrics and standards identified in their contracts; • Budgeting and accounting activities are managed at the property level with a robust budgeting program in place that requires substantial internal CHA review be performed prior to approval; • Detailed accounting activities and financial analysis efforts are performed monthly to ensure that property expenditures are within budget guidelines and appropriately reported. <p>CHA makes every effort to ensure that program costs are reasonable and consistently applied in accordance</p> </div>	

with the Moving to Work Agreement by recording accounting activity at the grant and property levels. As identified in the LAMP, CHA utilizes property level management, accounting, and budgeting and has established a Central Office Cost Center (COCC). Internal control considerations are a priority for the CHA and are evident in the manner in which expenditures are budgeted, authorized and reported on. Reviews are routinely performed to make certain that the appropriate segregation of duties and approval authority are in place for CHA staff and management.

Further, CHA makes certain that Generally Accepted Accounting Principles are followed by having external firms perform the required annual financial and A-133 audits. These annual audits, in addition to the quarterly reviews performed by the external firm, require significant consideration be given to program reporting as well as up-to-date accounting treatment of Governmental Accounting Standards Board (GASB) pronouncements.

Section VC: Rental Assistance Demonstration (RAD) Participation Rental Assistance Demonstration (RAD) Participation

CHA is a participating PHA in the RAD program. In June of 2015, CHA received a portfolio award for 10,937 units under Component 1 of the RAD program. All of CHA's units included in the June 2015 award will be converted as PBV units. As of June 30, 2019, more than 5,000 units have been converted to PBV funding under the RAD program. The remaining 5,900 units are currently scheduled to be converted by FY2022.

A significant amendment of the Annual Plan to participate in RAD was submitted in 2014 and approved in March of 2015.

Has the agency submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version of that requires HUD approval.

No

6

Section Six **ADMINISTRATIVE**



CHICAGO HOUSING
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Section VI: Administrative

This section contains administrative requirements and certifications that are to be submitted in CHA's MTW Annual Plan.

Description of Planned or Ongoing PHA-Directed Evaluations of the Demonstration

CHA is not currently engaged in any agency-directed evaluations of its MTW Demonstration Program.

Lobbying Disclosures**Certification of Payments
to Influence Federal Transactions**

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

OMB Approval No. 2577-0157 (Exp. 01/31/2017)

Applicant Name

Chicago Housing Authority

Program/Activity Receiving Federal Grant Funding

Public Housing/Housing Choice Voucher

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 Authorized Official	Title
James L. Bebley	Acting Chief Executive Officer
Signature	Date (mm/dd/yyyy)
	10/17/19

Previous edition is obsolete

form HUD 50071 (01/14)
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3

Board Resolution**September 17, 2019****Item No. 1A****Proposed FY2020 Moving To Work (MTW) Annual Plan**

Presenter: Jennifer Hoyle, Director, Strategic Management

Recommendation

The Chief Executive Officer recommends that the Board of Commissioners of the Chicago Housing Authority approve the FY2020 Moving to Work (MTW) Annual Plan and authorize CHA to submit the FY2020 MTW Annual Plan to HUD.

The requested action in this item complies in all material respects with all applicable Chicago Housing Authority board policies and all applicable federal (HUD) regulations.

Background

As part of the MTW Agreement, CHA is required to submit an Annual Plan to HUD, due 75 days prior to the start of CHA's fiscal year. The MTW Annual Plan provides required information on planned operations and activities for the fiscal year, including proposed new MTW activities that require HUD approval.

A 30-day public comment period was conducted from July 26 – August 27, 2019. CHA held three public comment hearings during the public comment period: August 7th, August 14th and August 16th. Announcements for the public comment process appeared on CHA's website and in the Chicago Sun Times on Friday, July 26th; and Monday-Thursday, July 29th-August 1st; and Hoy Newspapers on Friday, August 1st and 8th. CHA also distributed resident notices across public housing properties and sent an email notification to HCV residents.

During the public comment period, residents and the general public were able to submit comments orally and in writing regarding the proposed FY2020 MTW Annual Plan. Prior to finalizing the proposed FY2020 MTW Annual Plan, CHA gave consideration to comments received during the public comment period. Public comments and CHA responses will be provided to the Board prior to approval and will be available to the public in the final plan amendment posted on CHA's website after Board approval and submission to HUD.

CHA has complied with the requirements of the Amended and Restated MTW Agreement and HUD regulations regarding annual plans and amendments.

Respectfully Submitted:

A handwritten signature in black ink, appearing to read "Jennifer Hoyle", is written over a horizontal line. The signature is fluid and cursive.

Jennifer Hoyle, Director
Strategic Management and Partnerships

RESOLUTION NO. 2019-CHA-47

WHEREAS, The Board of Commissioners has reviewed the Board Letter dated September 17, 2019 requesting approval of the Proposed FY2020 MTW Annual Plan and authorization to submit the Proposed FY2020 MTW Annual Plan to HUD attached hereto;

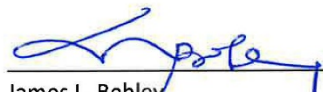
THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE CHICAGO HOUSING AUTHORITY:

THAT, The Board of Commissioners hereby approves the Proposed FY2020 Moving to Work Annual Plan and grants authorization to the Chief Executive Officer, the Board Chairperson, or their designee to make any final updates as deemed necessary;

THAT, This approval of the Proposed FY2020 MTW Annual Plan supersedes any and all conflicting language found in prior CHA MTW Annual Plans;

THAT, The Board of Commissioners grants authorization to submit the Proposed FY2020 MTW Annual Plan to the U.S. Department of Housing and Urban Development upon Board approval. Such approval shall constitute conclusive evidence of the Board's approval of any and all such changes.




James L. Bebley
Acting Chief Executive Officer
Chicago Housing Authority

Certifications of Compliance

OMB Control Number: 2557-0216
Expiration Date: 01/31/2021

CERTIFICATIONS OF COMPLIANCE
<p>U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING</p> <p>Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan</p>
<p>Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning 1/1/2020, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:</p> <ol style="list-style-type: none"> (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment. (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan. (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD). (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990. (5) 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. (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan. (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), 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). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91. (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975. (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW 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. (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped. (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135. (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F. (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

HUD FORM 50900: Certifications of Compliance

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- (14) The MTW 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.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW 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.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 200.
- (21) The MTW 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 Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (22) All attachments to the Plan have been and will continue to be available at all times and all locations that the 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 MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

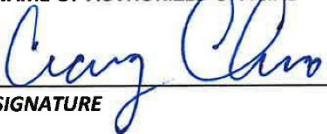
Chicago Housing Authority
 MTW PHA NAME

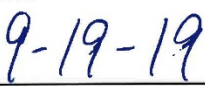
 MTW PHA NUMBER/HA CODE

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Craig Chico
 NAME OF AUTHORIZED OFFICIAL

Acting Chairperson, Board of Commissioners
 TITLE


 SIGNATURE


 DATE

** Must be signed by either the Chairman or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.*

Documentation of Public Process

Prior to submission of the Proposed FY2020 MTW Annual Plan for CHA Board approval, a 30-day public comment period was conducted from July 26th-August 27th. CHA held three public hearings during the comment period: (1) August 6th, 6:00 p.m., Family Investment Center, 4859 S. Wabash; (2) August 14th, 2:00 p.m., Ella Flagg Apartments, 4645 N. Sheridan; and (3) August 16th, 11:00 a.m., Little Italy Library, 1336 W. Taylor. A total of nineteen people attended the hearings. The comments received during the comment period and CHA's responses are listed in the table below.

Proposed FY2020 MTW Annual Plan Public Comment Period: July 26 - August 27, 2019 Public Comment Hearings: Aug. 6th, 6:00 pm, Family Investment Center; Aug. 14th, 2:00pm, Ella Flagg Apts, 4645 N Sheridan Rd; Aug 16th 11:00am, Little Italy Library, 1336 W Taylor			
Comment #	Individual/ Organization	Comment	CHA Response
1	Ronald Williams	I was targeted by individual and personal and, top managers of both site of Icarus and Pangaea property managers. Martinet's have come into to both sites' Pangaea and Icarus at different time of leasing and used equipment to raise my person electric and gas bills up very high also, both sites of both properties have used personal to core and key into Ronald Williams unit when, I was gone numerous complaints have been made to both C.H.A as well as Pangaea and Icarus sited managements and to police agents the a way of life ways made difficult all by design by hate groups to' Ronald Williams of both sites first of, Pangaea and Icarus properties agents from both buildings have used other means to commit identity theft of the person" Ronald Williams items of Ronald Williams have been taking from both properties of individuals' Ronald Williams' Pangaea first and' Icarus second, property managers and criminals which they have used have been sent to prevent the complaints from continuing by Ronald Williams in the last attempt, Ronald Williams was "Hospitalized" shortly after Ronald Williams reported fraudulent activities by property managers and their gang members with were used with the knowledge of of both top managers of both properties' Pangaea property and now' Icarus	Thank you for your comment.

		property, shortly after a child fell from' Icarus properties complaints were made to agents of C.H.A. police report were made about both properties nothing done identity theft of items also personal belongings have been stolen also used in a public arena called "Amazon" in which my person Ronald Williams did not authorize, A book entitled Just us or justice is racism dead hell No!	
2	merchantis46@gmail.com	I am inquiring about my refund I moved from 2603 N Leavitt St and put in for a reasonable accommodation. I now live at 2816 N Leavitt St Chicago, IL 60618 I wanna know if I get a refund.	CHA is preparing a comprehensive review of security deposit refunds for all Lathrop residents. Upon completion, checks will be mailed to the addresses identified in the system.
3	Angela Wilson	I read from CHA, that a proposal is being made to have work for housing. If this means a person will have to be employed to have CHA housing, I disagree with this. Some people may be retired, like myself, or disabled to work. Please don't let the work for housing go into effect. I am thanking you in advance for your kind concern, about the proposed annual Plan FY2020 MTW.	MTW is the acronym for Moving to Work, which is the name of a HUD program that CHA is participating in. As part of CHA's participation in this program, HUD requires CHA to produce an Annual Plan every year with projections for the upcoming year. HUD also requires that we have a 30-day public comment period for people to review and make comments on the Plan before it can be submitted to HUD.
4	Thelma Smith	In demo section of plan, what are the boundaries of SS regions and address of proposed demolitions.	The Scattered Site Regions cover the following areas of Chicago: Scattered Site (SS) Region 1 is the northeast side; SS Regional 2 is the northwest side; SS Region 3 is the south side; and SS 4 is the southwest side. The plan has been updated to include the addresses of the properties proposed for demolition.
5	Lynnette Solomon	In demo section of plan, what are the boundaries of SS regions and address of proposed demolitions.	The Scattered Site Regions cover the following areas of Chicago: Scattered Site (SS) Region 1 is the northeast side; SS Regional 2 is the northwest side; SS Region 3 is the south side; and SS 4 is the southwest side. The plan has been updated to include the addresses of the properties proposed for demolition.
6	Norma Jones	I need contact information for the Ombudsman.	CHA established the Office of the Ombudsman in 2009 to address the concerns of CHA residents living in mixed-income developments. The Ombudsman serves as a liaison between residents, property management, and/or community stakeholders. The Office of the Ombudsman can be reached by phone at 2312.913.7899 or by email at Ombudsman@thecha.org .

7	Yolanda Duplessis	I need clarity on the "Under-Occupied Unit" section on pg 85-89.	Property management is responsible for confirming the composition of every household at recertification. Transfers may be initiated for families that are over housed (living in a bedroom size too large) or overcrowded (living in a bedroom size too small) in accordance with occupancy guidelines. Transfers will not be initiated due to the temporary absence of a family member who is a student away at college.
8	Lynnette Solomon	I want information on transferring from one site to another.	CHA residents in family housing may take advantage of transfer opportunities via CHA's Family Public Housing Resident Transfer Portal link. https://fphresidenttransferwl.thecha.org/
9	Lynnette Solomon	What is the purpose of the meeting?	As part of CHA's participation in HUD's Moving to Work Demonstration Program, CHA is required to produce an Annual Plan every year with projections for the upcoming year. HUD also requires that CHA conduct a 30-day public comment period for people to review and make comments on the Plan before it can be submitted to HUD.
10	Lynnette Solomon	I would like information on the Choose to Own program.	CHA's Choose to Own Homeownership Program (CTO) allows qualified Public Housing and Housing Choice Voucher (HCV) families to use their housing subsidy to buy a home and receive monthly assistance with a portion of their mortgage. In addition to financial assistance toward the mortgage payment, the CTO program provides referrals to pre- and post-purchase homebuyer education, credit counseling, and other services to help families navigate the home buying process and increase their chances of success and self-sufficiency. You can obtain more information about the program by contacting a staff member at 312.786.3196 or 312.786.3404.
11	Cora Ward	Under Section III, I'd like to know if there's a percentage of housing vouchers that will be available for seniors, or is it just a hodgepodge of vouchers for the whole CHA? Right. Housing Choice Vouchers. Is it designated for the whole CHA; is there a percentage going to be designated for seniors only?	Jennifer Hoyle: We do have a representative from HCV here today, and I'm going to ask him to chime in in case I'm getting off topic here; but in terms of our HCV program, there is currently a wait list for the vouchers, and I don't believe that there is a preference specifically for seniors. Steven Field: Yes, that is correct. The vouchers that we have, we have, as Jenny mentioned, a waiting list, and we pull the vouchers, anybody who is on that waiting list, senior or non-senior, would be -- come in and go through their eligibility interview. We do not have a preference for those vouchers.
12	Cora Ward	What is the streamline program for seniors? What does that mean? That was a comment made in here about streamlining programs.	One of the general overarching goals of the MTW Program is for participating agencies to just streamline their programs and make them more efficient. Streamlining and efficiency are general

			goals and not specific to activities or programs for seniors.
13	Cora Ward	What is the exception payment standard?	SF: Payment standard is the maximum amount of subsidy that CHA will pay for a tenant-based voucher program. It's based on HUD published fair market rents for the entire Chicagoland region, not just the City of Chicago. And the exception payment standard is an MTW activity that will allow us to increase that number to 150 percent of the fair market rent as opposed to 110 percent of the fair market rent. Areas that we deem as mobility areas -- and generally speaking, mobility areas are more competitive rental market and have a higher rent amount. So it's without those exception payment standards, is very, very difficult for our participants to move into mobility areas.
14	Cora Ward	And the last question is, what is the disallowment policy for CHA PBV programs with the RAD program?	Typically, as a resident's income increases, their portion of the rent increases as well. The earned income disallowance, which is applicable to public housing residents, provides that within certain parameters, a resident's income can increase without the rent increasing. As CHA converted public housing senior buildings to project-based voucher units through RAD, the earned income disallowance would no longer have been applicable to most residents in those senior properties. In order to ensure that the public housing policy carried over to RAD PBV properties, CHA proposed and HUD approved a specific MTW activity that enabled us to apply this policy to RAD PBV units. The goal was to ensure that policies would be the same for seniors living in RAD PBV units as they were when the units were traditional public housing units.
15	Desmond Bowers	I was thinking, on the rate hike, what percentage that they usually based it on?	JH: Do you mean in the Housing Choice Voucher program? Do you mean the fair market rent? SF: Housing authorities can set their payment standards based on 90 to 110 percent of the fair market rent that HUD publishes for the Chicagoland area. So we set it between 90 and 111 -- 110 percent -- I'm sorry. And then, as I mentioned before, we have the exception payment standard that can go up to 150 percent of that fair market rent. JH: But the fair market rent itself is actually set by HUD based on looking at data from the Chicago and surrounding communities of what -- I think the average rents are for different-sized units. SF: Correct. JH: That is something that HUD looks at annually and establishes a

			table of what would be considered a fair market rent for like a three-bedroom in the Chicago region. So we're -- we use that information to inform what our payment standards are. But that is set by HUD for all of the housing authorities properties.
16	Ernest Norman	The RAD program, as I understand it, is a way of bringing private capital into the process of remodeling the apartments, many of the apartments in CHA system. Which strikes me as a good idea. What protections or guarantees are there that this is not going to go all the way to the point where some of these very geographically desirable locations are converted to market-rate apartments?	JH: Well, under the RAD program where CHA is converting -- and it's mostly at this point, I think, the senior portfolio to project-based voucher units -- we're obligated to keep those affordable. So that's not really an option for the properties -- the public housing units that are being converted to RAD PVBs; we're not allowed to do that. We're simply changing the funding platform. So right now what I can tell you is that the rules of the program would not allow us to do that.
17	Desmond Bowers	Is this legislation, or -- it's in the charter of CHA, or --	JH: this program is not specific to CHA, it's a HUD program. So the rules and regulations for the program are established by HUD. And actually, if you look in the Plan, there is a specific -- and I think it's in the appendix -- a specific section on RAD that refers to some of those regulations. So the RAD program is a HUD program that agencies across the country participate in. But that is one of the requirements is that the units have to be -- remain affordable. So they're still CHA units, they're still units in our portfolio; they're just Project-Based Voucher units rather than public housing units.
18	Desmond Bowers	I guess my question then gets to what guarantee is there that these very desirable areas are not going to be converted to market rate and the -- the affordable is going to be pushed out to other areas?	JH: Well, the buildings themselves that are being converted are still CHA properties. So we don't have the option of doing that, any more than we would with our public housing units. They're still under CHA's -- we still operate them as part of our portfolio. So the rules of the program wouldn't allow us to do what -- what you're describing.
19	Desmond Bowers	Rules coming down from HUD.	JH: Yes. The HUD regulations regarding how RAD works wouldn't allow us to do that. They're still considered to be a part of CHA's portfolio, they're not private units that could be sold in that manner.
20	Yolanda Duplessis	My question is about connecting some clarity on the -- under occupied unit. That would be found Page 85. Because there a lot of -- the children are -- their children are going off to college, and their children may leave the -- the house. So that means that we need to move, because you have to down-size if you no longer have that amount of people occupying the unit. So I guess it's going to be	ERIC GARRETT: Good evening, everyone. So basically you're asking a question if you currently -- you were recently -- you currently in a three- bedroom unit. Your household has now down-sized to one person in a three-bedroom unit.

		a lot of movement for four-bedroom apartments, for the head of household once it has just one person in the unit.	
21	Lynette Solomon	So what are you saying -- so you -- for instance, you got three bedrooms. So now you want to down-size to one room; right? Is that correct?	EG: The management is responsible for, at your certification process, identifying that. And so what they will do is, once they identify that you currently are overhoused -- that's considered being overhoused -- they would have to right-size you. So basically they have -- if they have a unit available that meets your bedroom size -- which means it's a one-bedroom unit. So they have to identify a one-bedroom unit, making sure that your name is at the top; because it may be other folks who have your same situation where they finally just have recently down-sized as well.
22	Yoland Duplessis	No. You have three-bedroom because you have enough people staying in the house to occupy those three bedrooms: you, your daughter, your son. That's three bedrooms. Son moves out. That's one bedroom that's not being occupied. Daughter may in turn move out. And then it's just you in the three-bedroom unit. So do you stay there, or do you have to move because you may need to down-size your unit. When I was told under CHA, once you move, this is your home forever. You know what I'm saying? Until you decide if you want to move out. But you can stay.	EG: So we will definitely make sure that you are housed in a correct order and make sure that you're housed appropriately. Yes, you will be down-sized to a one-bedroom unit.
23	Yoland Duplessis	That's frightening, because you may have to leave your community.	EG: I understand. I do understand that. However, we are obligated to ensure that every family has the appropriate bedroom size, even if that means that we actually have to move you to a different unit location. May not be the same building, may not be on the same property. But we have to -- we have to have the unit that meets your requirements.
24	Monica Jones	Absolutely. That was my question. Total life adjustment. That's a major life adjustment.	Thank you for your comment.
25	Annette Osborne	The crime at Zelda Ormes is out of control. People walking in the building who do not live in the building. Lots of underage people are roaming in the building.	CHA Portfolio Management will work closely with Property Management to ensure security is following proper protocols with sign-in procedures. Complaints will be discussed with security management team.

26	Annette Osborne	I need a new window screen for my living room window. Also the paint job in the bathroom has failed.	Portfolio Management will request follow-up on this request, including research on most recent work orders. A walkthrough of the unit assessing the need will also be requested. Update: Solonge Robinson, Portfolio Manager, has been in communication w/ Ms. Osborne on behalf of Iwona Kowalska re: kitchen sink repair. Maintenance completed a follow-up visit on Thursday, October 3rd. A follow-up visit is scheduled on Tuesday, October 8th at which time maintenance will be asked to look into the screen and paint.
27	Betty A. Welch-Thompson	Re: CHA's Mobility Counseling Demonstration Program Work Requirement: Participants unable to meet CHA's work requirement, who are not exempt, can apply for Safe Harbor, which provides relief in 180-days or six month increments while engaging in activities to become compliant. As these new details are now being implemented, please explain the actual activity in regular people's words so people can understand what to do or not to do. The questions below are a real demonstration of a misunderstanding: (1) is the Safe Harbor time sensitive? (2) if yes, how many 180-days Safe Harbors can I apply for? (3) If no, how many 180-day Safe Harbors can I apply for? (4) what is the actual work requirement covered in this paragraph?	<p>In 2015, CHA designed a Mobility Counseling Demonstration Program to provide applicants on the Public Housing Wait List who had at least one school-aged child under the age of 13 with the opportunity to receive a Housing Choice Voucher and move to a CHA Opportunity or Gautreaux-designated General Area. As a requirement of the program, applicants had to agree to participate in mobility counseling services and two years of follow up services through CHA's FamilyWorks program. Through this MTW activity (2016-01), CHA ensured that the work requirement that has been in place for public housing residents since 2009 would be applicable to participants in the Mobility Counseling Demonstration Program, who were initially applicants on CHA's Public Housing Wait List but ultimately received subsidies through the HCV program, which does not have a work requirement. The terms of the work requirement for the Mobility Counseling Demonstration Program are consistent with CHA's Public Housing Work Requirement, which is a separate MTW activity (2009-02).</p> <p>CHA's Public Housing Work Requirement is applicable to adult members of PH households age 18 to 54 or age 17 and not attending school full time. Residents can meet the work requirement through authorized activities, including employment or other work experience opportunities, school/training participation or volunteer/community service opportunities. Residents who are unable to comply with the work requirement may be eligible for Safe Harbor under certain circumstances including but not limited to reasonable accommodation, temporary medical conditions, recent employment separation and other circumstances that present barriers to finding and maintaining employment. Residents can apply for Safe Harbor in increments of</p>

			180 days during which time the resident must work with a service provider to create and implement an action and engagement plan.
28	Betty A. Welch-Thompson	CHA has exhausted the list of residents who could take part in the demonstration, therefore CHA will not be enrolling any residents: (1) What is the program demonstration talked about in this paragraph; (2) is it the Mobility Counseling Demonstration Program of 2015; (3) If yes, will these participants be the residents in the CHA's MTW Statutory Objective 1: program initiatives; (4) If no, will these families become part of the CHA's MTW Statutory Objective (1)? (5) Why should the CHA exit from this program at a time when family housing need the three and four bedroom units that are not being built.	The program referenced in this description is the Mobility Counseling Demonstration Program, which was implemented in 2015. All of the participants in the demonstration program are CHA residents. CHA designed the Mobility Counseling Demonstration Program as a demonstration program to provide residents on CHA's Public Housing Wait List with Housing Choice Vouchers to move to Opportunity or Gautreaux-designated General Areas while receiving mobility counseling and other services. Because CHA has enrolled the designated number of participants, CHA will no longer enroll new participants. This will not impact CHA's current development and unit delivery activities.
29	Housing Choice Partners, Andrea Juracek	Incentive Payments for Landlords in CHA Mobility Areas (pgs. 34-35) HCP does not support CHA's proposed changes to the current landlord incentive payment program that provides a one-time payment in the amount of the contract rent to landlords entering into a new lease with an HCV participant for a unit located in a Mobility Area. As this incentive program currently stands, it has effectively provided the incentive many landlords required to take part in the HCV program, as illustrated by the anticipated FY2019 spending amount of \$2,300,000. This large spending amount indicates the success of the program in incentivizing landlords in Mobility Areas – often tight rental markets where units can be rented in a matter of days – to hold a unit open during the lengthy HCV leasing process. CHA proposes cutting the incentive fund by over 80% of its current anticipated spending, to \$450,000 per year, by limiting the incentive to only new landlords to the HCV program in Mobility Areas. After informally polling landlords currently engaged in HCP's Mobility Counseling Program, and based off HCP's over twenty years of experience recruiting landlords into the HCV program in the Chicago region, HCP anticipates that this limited	Thank you for your comment. CHA needs to balance the need for responsible fiscal stewardship with the need to support access to better housing opportunities. After looking at the Landlord Incentive Payment Program, we have concluded that limiting these payments only to new property owners will considerably decrease the cost to CHA, while still offering the benefits the program is intended to provide. A principle goal of the Program was to encourage greater participation in the HCV program by more landlords. This renewed focus on new landlords will help further expand the number of units in Mobility Areas, thereby offering greater housing opportunities to HCV participants. Due to the expansion of the Mobility Area map in 2018, and therefore a significant increase in units that are eligible for a Landlord Incentive Payment, CHA concluded that continuing to issue payments to all new lease-ups places a substantial budgetary burden on the Authority. CHA will closely monitor the impact of this change and will consider making adjustments if necessary.

		incentive eligibility will severely impact landlords currently engaged in the program and will disincentivize new landlords from leasing up to any more than one HCV participant in Mobility Areas.	
30	Housing Choice Partners, Andrea Juracek	CHA states on page 34 of the Draft FY2020 MTW Plan that the HCV leasing process takes, on average, “51 days from the time an RTA is submitted until execution of the final HAP contract.” Without significant decreases to this average timeframe and no financial incentive to cover the cost of holding a unit off the market for this extended period of time, landlords currently engaged in the HCV program in Mobility Areas will have little-to-no incentive to continue their involvement if an HCV participant leaves their unit. This will significantly impact HCP’s ability to assist Mobility Program clients in finding housing in Mobility Areas, as many landlords currently engaged in the program are large housing providers that own upwards of 1,000 units or more throughout the City of Chicago.	Thank you for your comment. CHA needs to balance the need for responsible fiscal stewardship with the need to support access to better housing opportunities. After looking at the Landlord Incentive Payment Program, we have concluded that limiting these payments only to new property owners will considerably decrease the cost to CHA, while still offering the benefits the program is intended to provide. A principle goal of the Program was to encourage greater participation in the HCV program by more landlords. This renewed focus on new landlords will help further expand the number of units in Mobility Areas, thereby offering greater housing opportunities to HCV participants. Due to the expansion of the Mobility Area map in 2018, and therefore a significant increase in units that are eligible for a Landlord Incentive Payment, CHA concluded that continuing to issue payments to all new lease-ups places a substantial budgetary burden on the Authority. CHA will closely monitor the impact of this change and will consider making adjustments if necessary.
31	Housing Choice Partners, Andrea Juracek	Limiting the incentive program to only the first unit rented with an HCV by a new program landlord will inadvertently limit the housing options of HCV households and potentially push HCV households to high-poverty neighborhoods with slower housing markets, where landlords are more willing to hold a unit open during the long HCV leasing process. This will counter the CHA’s efforts to deconcentrate voucher holders and provide more housing choice through its Mobility Program. With the recently expanded Mobility Area Maps and increased FMRs it is reasonable to expect increased moves to mobility areas, yet the CHA anticipates this change to Incentive Payments for Landlords in CHA Mobility Areas will directly counter that expectation. For example, page 35 of the Draft FY2020 MTW Plan states that “in FY2015, CHA had a total of 586 move into Opportunity Areas” but anticipates the proposed change	Thank you for your comment. CHA needs to balance the need for responsible fiscal stewardship with the need to support access to better housing opportunities. After looking at the Landlord Incentive Payment Program, we have concluded that limiting these payments only to new property owners will considerably decrease the cost to CHA, while still offering the benefits the program is intended to provide. A principle goal of the Program was to encourage greater participation in the HCV program by more landlords. This renewed focus on new landlords will help further expand the number of units in Mobility Areas, thereby offering greater housing opportunities to HCV participants. Due to the expansion of the Mobility Area map in 2018, and therefore a significant increase in units that are eligible for a Landlord Incentive Payment, CHA concluded that continuing to issue payments to all new lease-ups places a substantial budgetary burden on the Authority. CHA will closely monitor the impact of this change and will consider making adjustments if necessary.

		will produce a reduction in these types of moves, down to only 261.	
32	Housing Choice Partners, Andrea Juracek	HCP recommends that CHA continue the landlord incentive payments as the program currently stands and make every effort to significantly shorten its overall leasing process to help both landlords and HCV participants fill a unit as quickly as possible throughout the entire city. Until the leasing process is shortened, the incentive should not be limited. HCP also recommends that CHA study any potential unrealized cost savings borne from the current Incentive Payments for Landlords in CHA Mobility Areas; such as the time savings CHA will incur when leasing with landlords who understand the program because they already participate in it, and determining if landlords who received the incentive payment have longer average lengths of tenancy or requests for emergency inspections. Incentive Payments may have many unrealized returns which deserve consideration prior to making any changes to the incentive program.	Thank you for your comment. CHA needs to balance the need for responsible fiscal stewardship with the need to support access to better housing opportunities. After looking at the Landlord Incentive Payment Program, we have concluded that limiting these payments only to new property owners will considerably decrease the cost to CHA, while still offering the benefits the program is intended to provide. A principle goal of the Program was to encourage greater participation in the HCV program by more landlords. This renewed focus on new landlords will help further expand the number of units in Mobility Areas, thereby offering greater housing opportunities to HCV participants. Due to the expansion of the Mobility Area map in 2018, and therefore a significant increase in units that are eligible for a Landlord Incentive Payment, CHA concluded that continuing to issue payments to all new lease-ups places a substantial budgetary burden on the Authority. CHA will closely monitor the impact of this change and will consider making adjustments if necessary.
33	Legal Aid Chicago, Michelle Gilbert	We applaud the many efforts CHA has undertaken in the past few years to increase voucher mobility – lengthening search time, increasing areas open for higher rent payment, and increasing payments for accessible housing. However, we oppose the plan to eliminate landlord incentive payments for owners who have already received an owner incentive payment. From landlord focus groups, meetings with the real estate industry, and individual cases, we know that the delay in the inspection and lease-up process is a reason why landlords refuse to participate in the voucher program. Unfortunately, human rights enforcement efforts can accomplish little when landlords raise lost rental income from empty units as a legitimate business defense for non-participation.	Thank you for your comment. CHA needs to balance the need for responsible fiscal stewardship with the need to support access to better housing opportunities. After looking at the Landlord Incentive Payment Program, we have concluded that limiting these payments only to new property owners will considerably decrease the cost to CHA, while still offering the benefits the program is intended to provide. A principle goal of the Program was to encourage greater participation in the HCV program by more landlords. This renewed focus on new landlords will help further expand the number of units in Mobility Areas, thereby offering greater housing opportunities to HCV participants. Due to the expansion of the Mobility Area map in 2018, and therefore a significant increase in units that are eligible for a Landlord Incentive Payment, CHA concluded that continuing to issue payments to all new lease-ups places a substantial budgetary burden on the Authority. CHA will closely monitor the impact of this change and will consider making adjustments if necessary.

34	Legal Aid Chicago, Michelle Gilbert	In fact, the success of the landlord incentive program itself is proof that landlords are more likely to participate if they are compensated for lost rent while awaiting inspection. Based on the methodology included in the MTW plan (\$2,300,000 spent on an average of \$1300 per payment), over 1700 voucher households qualified for the landlord incentive payment by moving to mobility areas. This is a significant increase over the number of voucher tenants moving to mobility areas in the past – and many more than predicted if the incentive payment is modified.	Thank you for your comment. CHA needs to balance the need for responsible fiscal stewardship with the need to support access to better housing opportunities. After looking at the Landlord Incentive Payment Program, we have concluded that limiting these payments only to new property owners will considerably decrease the cost to CHA, while still offering the benefits the program is intended to provide. A principle goal of the Program was to encourage greater participation in the HCV program by more landlords. This renewed focus on new landlords will help further expand the number of units in Mobility Areas, thereby offering greater housing opportunities to HCV participants. Due to the expansion of the Mobility Area map in 2018, and therefore a significant increase in units that are eligible for a Landlord Incentive Payment, CHA concluded that continuing to issue payments to all new lease-ups places a substantial budgetary burden on the Authority. CHA will closely monitor the impact of this change and will consider making adjustments if necessary.
35	Legal Aid Chicago, Michelle Gilbert	Limiting the incentive payment to owners who have not yet received the payment restricts tenant access to mobility neighborhoods too much because large, corporate landlords control too many units. For example, the real estate market in Hyde Park, a community area that recently opened up to higher payment standards, is largely controlled by a few landlords. The promise of moving to opportunity areas dries up if CHA phases out the incentive payment so quickly. Tenants who may have considered attempting to move to a mobility area, but waited while gaining money to move or improving their credit score, will have diminished opportunities to move.	Thank you for your comment. CHA needs to balance the need for responsible fiscal stewardship with the need to support access to better housing opportunities. After looking at the Landlord Incentive Payment Program, we have concluded that limiting these payments only to new property owners will considerably decrease the cost to CHA, while still offering the benefits the program is intended to provide. A principle goal of the Program was to encourage greater participation in the HCV program by more landlords. This renewed focus on new landlords will help further expand the number of units in Mobility Areas, thereby offering greater housing opportunities to HCV participants. Due to the expansion of the Mobility Area map in 2018, and therefore a significant increase in units that are eligible for a Landlord Incentive Payment, CHA concluded that continuing to issue payments to all new lease-ups places a substantial budgetary burden on the Authority. CHA will closely monitor the impact of this change and will consider making adjustments if necessary.

36	Legal Aid Chicago, Michelle Gilbert	As recognized in the MTW plan, the real problem is that the lengthy inspection and lease-up waiting times, which the landlord incentive payment partially addresses, have not improved over the last two years. Thus, we urge CHA to keep the landlord incentive payments in place as originally designed for a few more years, during which CHA can work to address the inspection and lease-up delays, rather than severely limiting it at a time when the delay still approaches two months. We are very interested in working with CHA and its contractors to address the lease-up delays, including the plan to implement the conditional approval for non-life-threatening HQS fails and improved technology.	Thank you for your comment.
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APPENDICES



CHICAGO HOUSING
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Appendices

Local Asset Management Plan

CHA's Amended and Restated MTW Agreement authorizes the Authority to design and implement a local asset management program for its Public Housing Program. As identified in the amended MTW agreement, the term "Public Housing Program" means the operation of properties owned or subsidized by the Authority that are required by the U.S. Housing Act of 1937 to be subject to a public housing declaration of trust in favor of HUD.

CHA has developed this program to ensure that accounting and financial reporting methods comply with OMB Circular A-87 regarding cost allocations, OMB Circular A-133 regarding audit requirements, and generally accepted accounting practices (GAAP), as codified in 2 CFR. 200.400 et. seq. and 2 C.F.R. 200.500 et. seq., respectively

The local asset management program incorporates the following key components:

- Implementation of project-based management – CHA has decentralized property operations to each property by contracting with professional private management companies. These private management companies manage the day-to-day operations in accordance with HUD public housing requirements and are overseen by CHA's Asset Management staff.
- Budgeting and accounting – Public housing operating budgets at the property level are completed annually and the related accounting activities are maintained at that level as well. This model allows the Authority to operate and monitor its asset portfolio as Asset Management Projects (AMPS).
- Financial management – Financial analysis is performed on a monthly basis, at the property level, to ensure operating budgets are properly managed. Financial reporting requirements are in accordance with the amended Moving to Work Agreement as well as 2 CFR. 200.400.

Program Principles

CHA's Public Housing Program's local asset management plan applies the following principles related to program costs:

- Costs incurred are deemed reasonable and consistent with the amended Moving to Work Agreement.
- Costs shall be accorded consistent treatment.
- Costs shall be determined in accordance with GAAP.
- Costs are adequately documented.
- CHA will report results according to HUD MTW guidelines.

Cost Allocation Approach

CHA's Amended and Restated Moving to Work Agreement identifies either a "fee-for-service" option or an "indirect cost" option to be utilized to distribute direct and indirect costs under local asset management plan under Circular A-87. CHA utilizes an indirect cost allocation. CHA is in keeping with 24 CFR 990 and uses property level management, accounting, and budgeting and has established a Central Office Cost Center (COCC). As stated in 2 CFR 200.412, there is no universal rule for classifying costs as either direct or indirect. A cost may be direct with respect to some specific service or function, but indirect with respect to the final cost objective. Direct costs associated with project activities are allocated to the specific properties receiving the benefit of the expenditure. Direct and indirect costs associated with the COCC are allocated on a reasonable basis and, if allocated to public housing properties, are substantially done using a project unit distribution basis.

The following Central Office Cost Center business units are in place at CHA:

- Executive Office
- Legal Services
- Finance
- Administration
- Property Division
- Housing Choice Voucher
- Resident Services
- Capital Construction
- Development Management
- Human Resources
- Inspector General
- Procurement
- Investments
- Internal Audit

CHA Cost Objectives under MTW

As a Moving to Work Demonstration program agency, the CHA utilizes single fund flexibility which allows the combination of the Public Housing Operating Fund, Public Housing Capital Fund, and Section 8 Housing Choice Voucher Program funding sources. Cost objectives for each program are taken into consideration as program level budgets are developed, accounting activities implemented, and financial reporting designed. Direct and indirect costs associated with the COCC are allocated on a reasonable basis and use a cost benefit approach. The following tables include, but are not limited to, the direct and indirect costs associated with CHA's Moving to Work Demonstration program:

Program Direct Costs	
Operating costs	Operating costs directly attributable to properties
Asset Management Department costs	Housing assistance payments
Capital improvement costs for properties	Property development costs
Resident Services Department costs	Legal costs
Insurance Costs	Housing Assistance Payments
Housing Choice Voucher department costs	Portability fees and expenses
Homeownership program costs	Any other cost readily identifiable to a property

Program COCC Indirect Costs	
Executive management costs	Procurement-related costs
Personnel administration costs	Information technology services
General finance and accounting costs	Grant management costs
Shared services costs	Any other administrative or indirect cost

Financial Reporting

CHA utilizes a project-level accounting system to track costs at the asset management property level and submits information to HUD through the following reporting systems:

- PIH Information Center (PIC);
- Voucher Management System (VMS);
- HUD Financial Data Schedule (FDS) on an annual basis; and
- The Annual Audit, with necessary supplemental schedules (Comprehensive Annual Financial Report)

Affirmatively Furthering Fair Housing

Physical Housing Stock—Public Housing

The CHA incorporates Uniform Federal Accessibility Standards (UFAS) into new construction and rehabilitation, ensuring that housing is provided for people with disabilities currently residing in CHA housing as well as those on its waiting lists. Whereas most housing authorities provide 5.0% and 2.0% of its units to people with mobility and sensory impairments, CHA provides 5.3% and 2.1% respectively. To ensure compliance with the exacting UFAS standards, the CHA contracts with a third-party architecture firm to certify all UFAS units. To date, the CHA has 1,568 UFAS-504 Mobility units, 386 UFAS-504 Sensory units and has certified 103 common areas as UFAS accessible.

CHA also works extensively with the City of Chicago to comply with the City of Chicago's Building Code - specifically Chapter 18-11 that addresses issues of accessibility. In CHA's newly redeveloped properties, four stories or more and containing 10 or more dwelling units, 20% of the units are mandated to be made adaptable for people with disabilities and the CHA works with its developers to build the required units.

Non-Housing Programs

Public Housing

CHA has expanded its capacity to affirmatively further fair housing and comply with all disability laws and regulations with the addition of two Accessibility Specialists in the Capital Construction Department (CCD). The Accessibility Specialists oversee the review and implementation of all Requests for Reasonable Accommodation in CHA's Public Housing Program. This process includes the review of all paperwork from residents, as well as their knowledgeable professionals, to ensure that it conforms to the regulations set forth by HUD as well as CHA policies regarding reasonable accommodations. Some examples of reasonable accommodations are: transfers, the addition of a live-in aide to the lease, companion and service animals, and extra bedrooms due to medical equipment.

CCD also conducts assessments when there is a reasonable accommodation request for a structural modification. Some examples of these requests include grab bar installation, installation of a walk-in or roll-in shower, or a ramp. When a structural modification is requested, an Accessibility Specialist conducts an in-person interview with the tenant as well as takes pictures of the unit's current condition. The specialist then writes a report detailing the findings and makes recommendations for accommodating the resident's disability-related needs.

The third-party certifier is working with the Accessibility Specialists in CCD to conduct a review of the Transition Plan for Section 504 compliance. The third-party certifier has contracted with a local attorney to review all documentation (paper and electronic) that is available to Public Housing residents, HCV participants, and applicants, to insure compliance with all disability laws and regulations. Also, as part of the review LCM's consultant will interview staff members from various departments about accessibility and reasonable accommodations.

Housing Choice Voucher (HCV)

The Fair Housing Department is responsible for compliance with all applicable fair housing and disability-related laws and regulations. With the addition of an Assistant Director and Housing Locator, the Fair Housing Department now has four staff to better serve HCV participants who need fair housing and disability-related assistance. The Housing Locator position was created to assist disabled housing

choice voucher participants locate accessible housing that meets their disability related needs. The Housing Locator is building a database of accessible units and conducting outreach to landlords who have expressed interest in retrofitting their units. Fair Housing monitors and addresses fair housing discrimination as well as issues decisions on reasonable accommodations for HCV participants. In first and second quarters of 2019, the Fair Housing Department delivered 809 decisions for reasonable accommodation requests submitted by HCV participants.

The Fair Housing Department organizes and facilitates trainings on fair housing and disability. In June 2019, the Fair Housing Department conducted seven trainings for all HCV contractors and HCV internal staff on Reasonable Accommodations and VAWA. Fair Housing also provides trainings for outside organizations such as non-profit community groups and real estate associations. Fair Housing moderated panels at CHA's 2018 annual HCV Owners Symposium discussing fair housing rights in affordable housing development. The CHA plans to offer Fair Housing and Disabilities trainings throughout 2019. Trainings will be a combination of on-site presentations and webinars

CHA's reasonable accommodation procedure will be updated to process and track reasonable accommodations through an on-line portal in the 4th quarter of 2019. This automated process will allow HCV participants and Public Housing residents to submit their reasonable accommodation requests online. This system will streamline requests by allowing CHA to transmit forms directly to knowledgeable professionals on-line through both email and fax and will notify CHA staff when forms have not been returned in a timely manner. The system will also be used to communicate directly with both property management staff and HCV housing specialists to ensure requests that involve multiple departments are completed in a reasonable timeframe.

In the HCV Program, CHA created the first of its kind Modification Fund, which consists of a pool of money set aside for the construction and installation of accessibility features for HCV participants. CHA first entered into an Intergovernmental Agreement (IGA) with the Mayor's Office for People with Disabilities (MOPD) in April 2016 to provide customized accessibility modifications that meet the needs of people with disabilities. CHA and MOPD entered into a new IGA in 2019 which will allow for a continued partnership. The IGA has value for both CHA and MOPD because it expands the number of accessible housing units in the city while giving HCV participants the features they need to remain in their homes. CHA pays only the hard costs for the modifications without an added administration fee. CHA refers participants to MOPD for an assessment and after it is determined that the modifications can be completed, the work is performed. Modifications can include: ramps, porch and stair lifts, roll-in showers, widened doorways, accessible sinks and cabinets. All services will be performed in accordance with federal, state and municipal accessibility legal requirements.

As part of an MTW demonstration program, CHA issues tenant-based vouchers to expand affordable housing choices within housing Mobility Areas in the city of Chicago. In order to access housing in these areas, the CHA may approve special EPS on a unit-by-unit basis up to 150% of the HUD published FMRs for the City of Chicago. This program gives HCV participants access to amenities in designated economic Mobility Areas, such as better education and healthier food, and encourages integration throughout the city. In addition, CHA has been approved for an MTW activity that allows disabled individuals to request a reasonable accommodation for an EPS on a unit-by-unit basis up to 250% of the FMR. Participants with disabilities must verify the accessibility features of the unit and the disability-related need for the features as well as provide documentation that they were unable to locate a less expensive unit with similar features.

CHA will conduct Fair Housing Testing in the 2nd and 3rd quarters of 2019. CHA has contracted with an outside fair housing agency with extensive knowledge of local, state and federal fair housing laws. The fair housing testing will primarily examine source of income by conducting matched paired tests

of housing choice voucher holders and non-voucher holders. Testing will also include race based and steering tests. The testing results will be used to analyze fair housing issues and shape CHA's fair housing goals as part of its duty to affirmatively further fair housing.

CHA also participates in a Fair Housing Task force that is organized by CAFHA that specifically addresses fair housing issues related to CHA HCV participants. CHA participates on the accessibility and policy committees and provides training and information on CHA programs so that outside agencies better understand the voucher program and the obstacles participants face when searching for housing in the private market. The subcommittees are currently working on projects that address the lack of housing search tools for disabled renters and considering ways to shorten lease-up times, which are often a barrier to voucher holders who are applying for units in the private market.

CHA is meeting its requirements to affirmatively further fair housing by participating in an Assessment of Fair Housing with the City of Chicago, Cook County, Cook County Housing Authority and several other public housing authorities and jurisdictions throughout Cook County. Enterprise Community Partners is managing the Regional Assessment of Fair Housing project with completion anticipated in 2020. CHA is one of four jurisdictions on the steering committee and will be providing community outreach, data and analysis in order to address impediments to fair housing.

CHA is currently working with several partners to address fair housing impediments, including Access Living, The Chicago Lawyers' Committee for Civil Rights Under Law, the John Marshall Fair Housing Clinic, CAFHA and the Chicago Commission on Human Relations (CCHR). CHA works closely with CCHR regarding cases that involve source of income discrimination and provides training and information to CCHR regarding public housing authority policies and procedures as well as CHA's specific MTW activities that may not apply to other agencies within their jurisdiction.

CHA is currently working with the City of Chicago, the Housing Authority of Cook County and Cook County to determine how to proceed with the Assessment of Fair Housing. Enterprise Community Partners is overseeing the collaboration between the participating agencies and jurisdictions.

Rental Assistance Demonstration Program

The CHA amended the FY2016 and FY2017 Moving to Work Annual Plan to reflect adjustments to the public housing developments anticipated for the RAD Program. CHA previously amended the FY2014 and FY2015 MTW Annual Plans with required RAD elements.

Through RAD, CHA is converting select properties to PBV under the guidelines of PIH Notice 2012-32 (HA), H-2017-03, REV-4 and any successor notices. Upon conversion to PBV, CHA will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6.C & 1.6.D of PIH Notice 2012-32 (HA), H-2017-03 REV-4 as amended by applicable HUD permissions and CHA's MTW authority. These resident rights, participation, waiting list and grievance procedures are appended to this Amendment. Additionally, CHA is currently and will remain compliant under RAD with all fair housing and civil rights requirements, Gautreaux and other court orders, if applicable.

RAD was designed by HUD to assist in preserving affordable housing assets and addressing capital needs of public housing by providing CHA with access to private sources of capital. Upon conversion, CHA's Capital Fund Budget will be reduced by the pro rata share of public housing units converted to PBV as part of the Demonstration, and CHA may also borrow funds to address capital needs in the future. CHA has and will continue to conduct physical capital needs assessments to determine the need for appropriate contributions to replacement reserves and to determine the immediate capital needs to address during the conversion of properties. Regardless of any funding changes that may occur as a result of conversion under RAD, CHA will maintain its continued service level as calculated using HUD's MTW Baseline methodology.

Specific information related to the additional public housing developments anticipated for RAD follows.

94 NAME AND STATUS	PIC AMP	RAD Type	Total Units	Unit Mix (Pre-Conversion / Post-Conversion)	Property Type	Transfer of Assistance Proposed	Capital Fund Allocation
Fannie Emanuel (Parkview) – converted 2016	IL002065000	PBV	181	1BR - 181	Senior	No	\$24,000,000
Daniel Burnham Apts – converted 2016	IL002075000	PBV	181	1BR - 181	Traditional Senior	No	\$7,400,000
Schneider – converted 2017	IL002059000	PBV	174	1BR – 174	Traditional Senior	No	\$5,222,933
Las Americas – converted 2017	IL002063000	PBV	212	1BR – 211 2BR – 1	Traditional Senior	No	\$7,110,040
Lorraine Hansberry – converted 2017	IL002064000	PBV	169	1 BR – 169	Traditional Senior	No	\$8,900,000
Mary Hartwell Catherwood	IL002055000	PBV	357	OBR – 11 1BR – 343 2BR – 3	Traditional Senior	No	TBD
Margaret Day Blake (incl. Maria Diaz Martinez and Elizabeth Woods)	IL002072000	PBV	317	1BR – 313 2BR – 4	Traditional Senior	No	TBD
Zelda Ormes	IL002049000	PBV	269	OBR – 82 1BR – 186 2BR – 1	Traditional Senior	No	\$8,408,400
Kenneth Campbell – converted 2018	IL002082000	PBV	165	OBR – 24 1BR – 140 2BR – 1	Traditional Senior	No	\$5,100,000
Mahalia Jackson	IL002041000	PBV	282	1BR – 280 2BR – 2	Traditional Senior	No	TBD
Hilliard 1 Senior	IL002135000	PBV	94	1BR – 94	Mixed- Income	No	\$900,000
Hilliard 1 Family	IL002099000	PBV	59	1BR – 12 2BR – 27 3BR – 10 4BR – 10	Mixed- Income	No	\$900,000
Caroline Hedger – converted 2016	IL002076000	PBV	450	OBR – 303 1BR – 145 2BR – 2	Traditional Senior	No	\$1,200,000
Minnie Riperton – converted 2016	IL002078000	PBV	339	OBR - 13 1BR - 325 2BR - 1	Traditional Senior	No	\$4,500,000
Robert Lawrence – converted 2017	IL002086000	PBV	193	1BR – 192 2BR – 1	Traditional Senior	No	\$8,996,010
Ada S. Dennison McKinley	IL002081000	PBV	125	1BR – 124 2 BR – 1	Traditional Senior	No	TBD
Ella Flagg Young (incl. Castleman)	IL002060000	PBV	436	OBR – 40 1BR – 396	Traditional Senior	No	TBD
William Jones – converted 2018	IL002070000	PBV	116	1BR – 115 2BR – 1	Traditional Senior	No	\$8,080,000
Irene McCoy Gaines	IL002062000	PBV	151	OBR – 32 1BR – 118 2BR – 1	Traditional Senior	No	TBD
Alfreda Barnett Duster	IL002042000	PBV	129	OBR – 26 1BR – 102 2BR – 1	Traditional Senior	No	TBD
Elizabeth Davis – converted 2018	IL002050000	PBV	149	1BR – 148 2BR – 1	Traditional Senior	No	\$5,675,000
Albany Terrace	IL002061000	PBV	350	1BR – 350	Traditional Senior	No	TBD

Edith Spurlock Sampson	IL002074000	PBV	394	OBR - 46 1BR - 346 2BR - 2	Traditional Senior	No	TBD
Flannery	IL002044000	PBV	252	OBR - 54 1BR - 196 2BR - 2	Traditional Senior	No	TBD
Wicker Park	IL002068000	PBV	225	1BR - 223 2BR - 2	Traditional Senior	No	TBD
Long Life - converted 2018	IL002066000	PBV	116	1BR - 115 2BR - 1	Traditional Senior	No	\$6,200,000
Mary Jane Richardson (incl. Maudelle Brown Bousfield)	IL002079000	PBV	266	OBR - 87 1BR - 177 2BR - 2	Traditional Senior	No	TBD
Vivian Gordon Harsh (incl. Judge Green) - converted 2019	IL002083000	PBV	278	OBR - 21 1BR - 255 2BR - 2	Traditional Senior	No	\$7,577,300 and \$13,127,700
Judge Fisher - converted 2017	IL002057000	PBV	199	OBR - 40 1BR - 159	Traditional Senior	No	\$11,008,000
Lidia Pucinska	IL002043000	PBV	378	1BR - 376 2BR - 2	Traditional Senior	No	TBD
Patrick Sullivan - converted 2019	IL002067000	PBV	482	OBR - 240 1BR - 240 2BR - 2	Traditional Senior	No	\$10,980,000
Armour Square	IL002046000	PBV	392	OBR - 43 1BR - 345 2BR - 4	Traditional Senior	No	TBD
Lincoln Perry - converted 2016	IL002052100	PBV	450	OBR - 8 1BR 440 2BR - 2	Traditional Senior	No	\$7,650,000
Judge Slater - converted 2016	IL002084000	PBV	407	OBR - 13 1BR - 393 2BR - 1	Traditional Senior	No	\$7,250,000
Vivian Carter - converted 2018	IL002080000	PBV	224	1BR - 223 2BR - 1	Traditional Senior	No	\$6,800,000
Hattie Callner - converted 2018	IL002048000	PBV	147	OBR - 30 1BR - 116 2BR - 1	Traditional Senior	No	\$7,700,000
Horner Westhaven (Superblock)* - converted 2016	IL002156000	PBV	95	1BR-30/1BR-38 2BR-54/2BR-31 3BR-99/3BR-21 4BR-10/4BR-4 5BR-8/5BR-1	Mixed-income	No	TBD
Lathrop Homes* Phase 1A converted 2017	IL002022000	PBV	400	1BR-454/1BR-TBD 2BR-401/2BR-TBD 3BR-63/3BR-TBD 4BR - TBD	Mixed-Income	Yes - multiple locations TBD	TBD
6438 N. Sheridan (The Concord)	IL002022000 MP1	PBV	65	1BR - 47 2BR - 18	Family	Yes - Proposed Transfer from Lathrop Homes	\$20,000,000
4501 N. Winchester	IL002022000 MP2	PBV	74	1BR - 74	Senior	Yes - Proposed Transfer from Lathrop Homes	TBD
2031 - 37 N. Milwaukee	IL002022000 MP4	PBV	47	1BR - 35 2BR - 12	Family	Yes - Proposed Transfer from Lathrop Homes	TBD

5525 W. Diversey	IL002022000 MP3	PBV	45	1BR - 45	Family	Yes - Proposed Transfer from Lathrop Homes	TBD
4022 N. Elston	IL002022000 MP5	PBV	30	1 BR - 30	Senior	Yes - Proposed Transfer from Lathrop Homes	TBD
6800 N. Western	IL002022000 MP6	PBV	30	1 BR - 30	Senior	Yes - Proposed Transfer from Lathrop Homes	TBD
3435 W. Montrose	IL002022000 MP7	PBV	32	1 BR - 19 2 BR - 13	Family	Yes - Proposed Transfer from Lathrop Homes	TBD
Altgeld Gardens*	IL002002000B	PBV	0	0BR - 2/0BR - 0 1BR - 12/1BR - 0 2BR - 104/2BR - 0 3BR - 102/3BR - 0 4BR - 24/4BR - 0	Family	Yes - multiple locations TBD	---
Ickes Phase 1A and 1B	--	PBV	68	TBD	Family	Yes - Proposed Transfer from Altgeld Gardens	TBD
Langston	IL002021000	PBV	29	1BR - 9 2BR - 11 3BR - 4 4BR - 5	Mixed- Income	No	TBD
Quincy	IL002020000	PBV	27	1BR - 5 2BR - 14 3BR - 7 4BR - 1	Mixed- Income	No	TBD
Other	---	PBV	510	TBD	TBD	TBD	TBD
*Represents proposed partial RAD conversions							

RAD Residents Rights, Participation, Waiting List and Grievance Procedures for PBV

Extracted from PIH Notice 2012-32, REV-2, Section 1.6 (C), adapted for CHA-specific policies

In FY2014, CHA updated the HCV Administrative Plan to reflect the below RAD-specific policies, as well as created a RAD lease/lease addendum and RAD grievance procedure. These RAD policies were released for public comment in November 2014 and approved by CHA's Board in January 2015.

- 1. No Re-screening of Tenants upon Conversion.** Pursuant to the RAD statute and regulations, at conversion, current households are not subject to rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. 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, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family.

2. **Right to Return.** Other than the Horner Superblock, CHA has not confirmed plans to substantially rehabilitate occupied RAD properties that would require off-site temporary displacement of any residents at the time of RAD conversion. If it is later determined that off-site relocation is required for select sites, CHA will comply with all RAD relocation and Right of Return provisions. For the Horner Superblock, CHA will follow the relocation process outlined in the November 2013 Horner Agreed Order and the Tenant Relocation Plan for Horner Phase I Superblock Development approved by HUD.
3. **Renewal of Lease.** Under RAD, CHA or the owner must renew all leases upon lease expiration, unless cause exists. This provision is incorporated into the CHA tenant lease and lease addendum, as appropriate. The lease renewal policy, along with other RAD policy updates, were incorporated into the HCV Administrative Plan that was released for public comment in November 2014 and approved by CHA's Board in January 2015.
4. **Phase-in of Tenant Rent Increases.** If a tenant's monthly rent increases by more than the greater of 10% or \$25 purely as a result of conversion, the rent increase will be phased in over 5 years. To implement this provision, HUD is waiving section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) only to the extent necessary to allow for the phase-in of tenant rent increases. As part of necessary updates to the HCV Administrative Plan, CHA created a policy setting the length of the phase-in period at five years. This policy will be in place at conversion and may not be modified after conversion.

Rent adjustments under the 5-year phase-in schedule are anticipated to occur at annual or interim re-examinations. After this phase-in period, impacted residents will transition to biennial re-examinations (every two years) or triennial re-examinations (every three years), as applicable per CHA's MTW authority, once the calculated income-based TTP is reached. CHA's updated ACOP and HCV Administrative Plan contain more information regarding requirements and qualifications for biennial and triennial re-examinations.

The below method explains the set percentage-based phase-in an owner must follow according to the phase-in period established. For purposes of this section "standard 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.

Five Year Phase-in:

- Year 1: Any re-examination (interim or annual) performed prior to the second annual re-examination after conversion – 20% of the difference between most recently paid TTP and the standard TTP
- Year 2: Year 2 annual re-examination and any interim re-examination prior to Year 3 annual re-examination – 40% of the difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 annual re-examination and any interim re-examination prior to Year 4 annual re-examination – 60% of the difference between most recently paid TTP and the standard TTP
- Year 4: Year 4 annual re-examination and any interim re-examination prior to Year 5 annual re-examination – 80% of the difference between most recently paid TTP and the standard TTP
- Year 5 annual re-examination and all subsequent re-examinations – Full standard TTP

Once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward. As previously stated, upon completion of the 5-year phase-in period, CHA tenants will be transitioned to biennial or triennial re-examination schedules as applicable.

5. **Public Housing Family Self Sufficiency (PH FSS).** Current Public Housing FSS participants will continue to be eligible for FSS once their housing is converted under RAD. CHA will be allowed to use any remaining PH FSS funds to serve those FSS participants who live in units converted by RAD. 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 FY15 Appropriations Act), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD. CHA will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984, 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. Escrowed funds for PH FSS participants will be transferred into the HCV escrow account.
6. **Resident Participation and Funding.** Resident organizations and representation in place at CHA properties prior to the RAD conversion will continue to be managed and recognized in accordance with current CHA policies and HUD regulations.
7. **Resident Procedural Rights.** The following items will be incorporated into both CHA's HCV Administrative Plan and the owner's lease (including the required lease or lease addendum), as applicable.
 - a. **Termination Notification.** CHA's termination procedure for RAD will provide adequate written notice of termination of the lease. As required, CHA developed a termination policy that was included in updates to the HCV Administrative Plan that were released for public comment in November 2014 and approved by CHA's Board in January 2015.
 - b. **Grievance Process.** For issues related to tenancy and termination of assistance, CHA will provide an opportunity for an informal hearing. As required, CHA developed a grievance procedure that incorporates essential components of the current public housing grievance process as well as required RAD provisions. CHA's RAD grievance procedure was released for public comment in November 2014 and approved by CHA's Board in January 2015.
8. **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 5-year phase-in, as described in Section 1.6.C.4 (item #4 herein); instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the HCV Program, the EID exclusion is limited to only 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 section 5.617(b) limiting EID to only disabled persons is waived. The waiver and resulting alternative requirement only applies to tenants receiving the EID at the time of conversion. No other tenant (e.g., 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; tenants that move into the property following conversion, etc.) is covered by this waiver.

- 9. Under-Occupied Units.** If a household is in an under-occupied unit under 24 CFR 983.259 at the time of conversion, the household may remain in the unit until an appropriate-sized unit becomes available in the RAD property. When an appropriate-sized unit becomes available in the RAD property, the household living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Contract Administrator. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the RAD property, HUD has waived 24 CFR 983.259.
- 10. Waiting List Administration.** CHA will continue to use the Community-Wide (family) Wait List and Site-Based Senior Housing Wait List (as applicable) for RAD properties. For RAD properties where transfer of assistance will be utilized, CHA will notify existing wait list applicants how they can apply for any new properties with site-based wait lists. All newly established site-based wait lists will be prepared in accordance with all applicable civil rights, fair housing laws and regulations, and applicable court orders.
- 11. Choice Mobility.** After completing a one-year residency requirement under the RAD program, households within RAD PBV units may request a tenant-based HCV. CHA will provide tenant-based vouchers to the households that have requested them to the extent that they are available. CHA reserves the right to provide no more than three-quarters of its turnover vouchers per year to eligible Choice-Mobility households.

Certification for a Drug-Free Workplace

Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

Applicant Name

Chicago Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving To Work Demonstration

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:

a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b. Establishing an on-going drug-free awareness program to inform employees ---

- (1) The dangers of drug abuse in the workplace;
- (2) The Applicant's policy of maintaining a drug-free workplace;
- (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
- (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;

d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---

- (1) Abide by the terms of the statement; and
- (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federalagency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

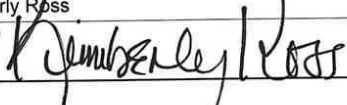
(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

2. **Sites for Work Performance.** The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)

Check here if there are workplaces on file that are not identified on the attached sheets.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.
Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties.
 (18 U.S.C. 1001, 1010, 1012, 31 U.S.C. 3729, 3802)

Name of Authorized Official Kimberly Ross	Title Chief Human Resources Officer
Signature X 	Date October 9, 2019

form HUD-50070 (3/98)
 ref. Handbooks 7417.1, 7475.13, 7485.1 & .3



CHA Sites for Work Performance:

- 1. Chicago Housing Authority**
60 E. Van Buren Street
Chicago, IL 60605

- 2. Charles Hayes Family Investment Center (FIC)**
4859 S. Wabash Avenue
Chicago, IL 60615

- 3. HCV Regional Office**
West Office
1852 S Albany
Chicago, IL 60623

- 4. HCV Regional Office**
South Office
10 W. 35th Street
Chicago, IL 60616



Excessive Absenteeism and/or Tardiness

Excessive absenteeism or tardiness and patterns of sick or unpaid time before or after holidays, weekends or authorized leaves are unacceptable and will result in disciplinary action up to and including termination of employment.

4.4 Smoking

To comply with the 2005 Chicago Clean Indoor Air Ordinance and in order to provide employees and residents with a healthy environment, smoking and the use of electronic cigarettes is prohibited in all CHA buildings and facilities. Smoking is permitted outdoors at least 15 feet away from the entrance or enclosed area of any building.

4.5 Drug Use and Alcohol Abuse

The CHA is committed to a community that is free of illegal drug use and alcohol abuse. The Authority strictly prohibits the unlawful possession, use or distribution of illicit drugs or alcohol at any of its properties. Any employee found to possess, use or distribute alcohol or controlled substances on CHA property, or at a CHA activity, in violation of law or CHA policy is subject to disciplinary action, including termination, as well as possible referral for criminal prosecution.

Employees who take prescribed drugs that affect their cognitive abilities should not report to work and should use appropriate leaves.

Employees are required to participate in drug and alcohol testing at a CHA designated testing facility in the following circumstances:

1. Upon the CHA's making a conditional offer of employment.
2. Upon re-employment or return from any period of continuous absence of thirty (30) calendar days or more.
3. In instances where the employee has been involved in an automobile accident during the course of employment, regardless of whether the automobile is a CHA vehicle or the employee's vehicle and regardless of whether the employee is injured, the employee must submit to a medical evaluation which includes drug and alcohol testing as immediately after the accident as practical under the particular circumstances, but in no event later than twenty-four (24) hours after the accident.
4. In instances where the employee has suffered an alleged accident, regardless of whether the employee is injured or not, the employee must submit to a medical evaluation which includes drug and alcohol testing immediately after the accident or as soon as practical under the particular circumstances, but in no event later than twenty-four (24) hours after the accident.
5. In instances where the employee's supervisor has a reasonable suspicion that the employee is at work under the influence of drugs and/or alcohol.

Employees who submit to drug and alcohol testing described above and whose test results show a positive result will be terminated. Employees who refuse to cooperate in the testing process will be terminated. Employees whose test results are positive may elect to have the sample re-tested at a different accredited laboratory at the employee's cost. Arrangements for re-testing must be made through Human Resources.

The CHA is committed to being a drug-free, healthy, and safe workplace. Employees are required to come to work in a mental and physical condition that will allow them to perform their job satisfactorily.

Under the Drug-Free Workplace Act, if you perform work for a government contract or grant, you must notify the CHA if you have a criminal conviction for drug-related activity that happened at work. You must make the report within five (5) days of the conviction.

If you have questions about this policy or issues related to drug or alcohol use at work, you can raise your concerns with your supervisor or the Human Resources Department without fear of reprisal.

4.6 Workplace Safety

In compliance with the Illinois Occupational Safety and Health Act (OSHA), the Authority strives to provide reasonable protection for the lives, health and safety of its employees and to furnish a workplace free of recognized hazards that would cause serious physical harm to its employees. Employees must immediately report all unsafe or unhealthy working conditions or practices and all alleged work-related accidents to their supervisor or department head. Employees seeking further information about safety practices or emergency procedures should contact the Risk Management Department.

4.7 Workplace Violence

CHA recognizes the unfortunate increase in workplace violence in our society and has a strong commitment to ensuring that our workplace remains safe. The possession or use of weapons is prohibited on CHA property or anywhere the CHA conducts business, unless authorized by the agency to do so.

To help employees understand and report behavior that could lead to violent incidents, we have included this list of prohibited conduct. This list of behaviors should not be considered all-inclusive, but merely a list of examples to be considered. These and other violent actions may result in disciplinary action, up to and including termination:

- Intentionally causing physical injury to another person
- Making verbal or written (including email) threats of violence/intimidation
- Aggressive or hostile behavior
- Intentionally damaging CHA property or property of another employee
- Possession of a weapon (prohibited weapons include any form of weapons or explosives restricted under local, state or federal regulation; this includes all firearms, knives, harmful chemicals or other weapons)
- Committing acts motivated by or related to, sexual harassment, discrimination or domestic violence
- Retaliatory actions against an individual who reported a workplace violence incident.

When deemed necessary by CHA officials, the Authority reserves the right to inspect and/or search all CHA property.

LORI LIGHTFOOT
MAYOR, CITY OF CHICAGO

JAMES L. BEBLEY
ACTING CEO, CHICAGO HOUSING AUTHORITY

ANGELA HURLOCK
CHAIRPERSON

CRAIG CHICO
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