





### FY2021 MOVING TO WORK ANNUAL PLAN





### **Table of Contents**

	n I: Introduction	
	n II: General Operating Informationon IIA: Housing Stock Information	
i.	Planned New Public Housing Units in FY2021	9
ii.	Planned Public Housing Units to be Removed in FY2021	9
iii.	Planned New Project-Based Vouchers in FY2021	10
iv.	Planned Existing Project-Based Vouchers	11
V.	Planned Other Changes to the Housing Stock in FY2021	21
vi.	General Description of Planned Capital Expenditures in FY2021	27
Section	on II-B: Leasing Information	27
i.	Planned Number of MTW Households Served at the End of FY2021	27
ii.	Description of Anticipated Issues Related to Leasing in FY2021	28
Section	on II-C: Wait List Information	29
i.	Wait List Information Anticipated	29
ii.	Changes to CHA Wait Lists in FY2021	30
	n III: Proposed MTW Activities: HUD Approval Requested	
	on IV: Implemented Activitieson V: MTW Sources and Uses of Funds	
	on VI: Administrative	
	ription of Planned or Ongoing PHA-Directed Evaluations of the Demonstration	
Lobb	ying Disclosures	74
Board	d Resolution	75
Certin	fication of Compliance	77
Docu	mentation of Public Process	79
Appen	ndices	90
	l Asset Management Plan	
Affirn	matively Furthering Fair Housing	92
Renta	al Assistance Demonstration Program	95
Certif	fication for a Drug-Free Workplace	102

### Section One INTRODUCTION



### 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

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, to fulfill the obligations of CHA's MTW Agreement with HUD, and to respond to local housing preferences and market opportunities.

- Mixed-Income Redevelopment: CHA plans to continue with new on- and off-site phases in mixed-income developments which have replaced many former CHA properties and acquisition of properties in Opportunity Areas.
- **Property Rental Assistance (PRA) Program.** CHA plans to 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 plans 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.

During FY2021, CHA plans to deliver an additional 119 PBV and Public Housing units through the above-referenced initiatives.

PROJECTED FY2021 PH/PBV UNIT DELIVERY						
Туре	Program	Development Name	Projected Number of Units			
Public Housing	Mixed-Income	508 Pershing	20			
PBV	PRA	Humboldt Park Residence	8			
		Lawrence & Ravenswood Apartments	17			
PBV	RAD1	Ravenswood Senior Living	74			
Total			119			

Local, Non-Traditional Programs: CHA has implemented program-based assistance to help families access housing and remain stably housed, with social services are linked to the housing assistance to ensure that families achieve stability. Through CHA's funding assistance, 120 units of housing may be made available to families in need by providing funding to the City of Chicago's flexible housing pool and 380 units of housing may be made available through the Choose To Own Homeownership Program. In addition, CHA has committed 200 vouchers to help disabled households access housing and 450 vouchers for supportive housing for the Ending Veteran Homelessness Initiative.

### 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 5,000 units converted to PBV under the RAD program. In FY2021, CHA plans 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 FY2021

In FY2021, CHA is requesting HUD approval for three new MTW activities and significant changes to one previously approved MTW activity.

### Housing Choice Voucher Program

- Using Voucher Size to Determine Payment Standard (2021-1): This proposed activity would enable CHA to determine payment standard by voucher size irrespective of the size of the unit. This activity would benefit families who move into units smaller than their voucher size where the existing policy penalizes voucher holders who decide to move into a unit smaller than their voucher, resulting in additional rent burden. This policy mitigates the increased costs for these families and provides a subsidy solely based on their family composition.
- Conducting HQS Inspections for a Sample of Units in Buildings with Substantial Numbers of HCV
   Voucher Holders (2021-2): CHA is proposing an activity that would allow inspections of sample of
   units every year in buildings with a large number of HCV voucher holders, rather than having all of

them inspected every other year. This proposed activity would make CHA's inspection process more efficient and reduce costs.

• Providing a Flat Medical Deduction for all Elderly/Disabled Households (2021-3): CHA proposes a flat medical deduction of \$400 to all elderly/disabled households, which would ensure that a greater number of eligible households benefit from the deduction by removing the burden on participants to obtain and provide the appropriate documentation, as well as for staff to calculate the correct amount. Participants who have a medical deduction of more than \$400 will continue to receive their full amount and this activity will have no impact on them.

### Approved MTW Activities in FY2021

In FY2021, CHA continues 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. CHA will also 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 will continue to provide 25,000 housing
  units and 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.
- Choose to Own (CTO) Homeownership Program for Public Housing and HCV (2011-01): CHA has expanded the HCV Choose to Own Homeownership Program to eligible public housing residents.
- 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 Elderly/Disabled Participants and Fixed Income for HCV and Public Housing (2014-02): CHA has implemented triennial re-examinations for households with elderly/disabled participants on fixed-incomes and is proposing to expand the number of HCV households eligible for triennial examinations to include households with nearelderly participants (age 55-61).

- 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.
- 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.

### **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.
- Incentive Payments for Landlords in CHA Mobility Areas (2017- 02): CHA proposes limiting the
  Landlord Incentive Payment to 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.
- 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 (2018-02): CHA has implemented a hardship exemption
  for household members who are making required child support payments that hinder their ability
  to pay their monthly rent portion.

### 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-byproject 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 substantiallyrehabilitated 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 has implemented
program-based assistance to help families access housing and remain stably housed. Social
services are linked to the housing assistance to ensure that families achieve stability.

### **Activities On Hold**

Mobility Counseling Demonstration Program Work Requirement (2016-01): CHA has exhausted
the list of participants eligible to take part in this demonstration and will close this activity in the
FY2020 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.

 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 closed this activity in the FY2019 MTW Annual Report.



# Section Two GENERAL HOUSING AUTHORITY OPERATING INFORMATION



### 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 FY2021

Planned New Public Housing Units to be Added During FY2021											
	Bedroom Size			Total	Population	# of Uniform Federal Accessibility Standards (UFAS) Units					
Amp Name and Number	0	1	2	3	4	5	6+	Units	Туре	Fully Accessible	Adaptable
508 Pershing								20	Family	2	4
	Tatal Dublic Housing Units to be Added							A al al a al	20		

### Total Public Housing Units to be Added

### Overview of New Public Housing Units in FY2021

• 508 Pershing—Oakwood Shores/Former Madden Wells. In FY2020, CHA worked with the development team who commenced construction on the Oakwood Shores 508 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, 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.

### ii. Planned Public Housing Units to be Removed in FY2021

### **Dwelling Demolition**

PLANNED PUBLIC HOUSING UNITS TO BE REMOVED*							
AMP Name and Number	Number of Units to be Removed	Explanation for Removal					
Scattered Sites Region 1 IL002032000	9	Structural deficiencies: 1911 N. Sedgwick, 6 units 3358 N. Central Park, 1 unit 3607 W. Roscoe, 2 units					
Scattered Sites Region 2 IL002034000	2	Structural deficiencies: 2648 S. Homan					
Scattered Sites Region 4 IL002035000	1	Structural deficiencies: 7614 S. Coles					
Lathrop Homes IL002022000	18	Physical Obsolescence 2633-67 N. Hoyne					
Lathrop Homes IL002022000	43	Physical Obsolescence 2742-48 N. Hoyne					
Lathrop Homes IL002022000	18	Physical Obsolescence 2706-40 N. Hoyne					
Lathrop Homes IL002022000	43	Physical Obsolescence 2664-2704 N. Hoyne					

Lathrop Homes IL002022000	18	Physical Obsolescence 2628-62 N. Hoyne
Lathrop Homes IL002022000	43	Physical Obsolescence 2620-26 N. Hoyne

Total Number of Units to be Removed	195
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<sup>\*</sup>Other demolition activity previously proposed in annual plans may be carried out in FY2021.

### Non-Dwelling Demolition

CHA is not planning any non-dwelling demolitions in FY2021.

### iii. Planned New Project-Based Vouchers in FY2021

CHA has continued to expand the use of project-based vouchers (PBVs) to increase housing options for low-income families in the region. The following tables provide an overview of the 2,646 new PBVs planned to be under PRA/RAD1 AHAP or HAP in FY2021, including 2,453 conversions of PH units to RAD 1 PBVs and 193 new PBV units through PRA.

	PLANNED NEW PROJE	CT-BASED VOUCHER	S IN FY202	1
Property Name	Number of Vouchers To Be Project-Based	Planned Status at End of Plan Year	RAD?	Description of Project
RAD/PBV				
Albany Terrace* 3030 W 21st Pl	345	Leased	Yes	RAD1 in the South Lawndale community, for seniors 55+.
Ada S. Dennison McKinley Apartments* 661 E 69th St	124	Committed	Yes	RAD1 in the Woodlawn community, for seniors 62+.
Alfreda Barnett Duster* 150 S Campbell	126	Leased	Yes	RAD1 in the Near West community, for seniors 62+.
Castleman Apartments* 4945 N Sheridan	198	Leased	Yes	RAD1 in the Uptown community, for seniors 62+.
Elizabeth Wood Apartments* 1845 N Larrabee	82	Leased	Yes	RAD1 in the Lincoln Park community, for seniors 62+.
Irene McCoy Gaines* 3700 W Congress	149	Leased	Yes	RAD1 in the East Garfield Park community, for seniors 55+.
Mahalia Jackson Apts* 9141 S South Chicago	282	Committed	Yes	RAD1 in the South Chicago community, for seniors 62+.
Margaret Day Blake* 2140 N Clark	98	Leased	Yes	RAD1 in the Lincoln Park community, for seniors 62+
Maria Diaz Martinez Apts* 2111 N Halsted	133	Leased	Yes	RAD1 in the Lincoln Park community, for seniors 62+.
Mary Hartwell Catherwood* 3920-3940 N Clark	355	Leased	Yes	RAD1 in the Lakeview community, for seniors 62+.
Mary Jane Richardson* 4930 S Langley	170	Leased	Yes	RAD1 in the Grand Boulevard community, for seniors 55+.
Renaissance North 551 W North Ave	18	Leased	Yes	RAD1 in the Near North community, for families.
Wicker Park* 1414 N Damen/ 2020 W Schiller	220	Leased	Yes	RAD1 in the West Town community, for seniors 62+.
Total	2,300			
PRA/PBV				
Chicago Lighthouse Residence 1800 W Roosevelt	19	Committed	No	PRA/PBV in the Near West Side community, for families & individuals.

Encuentro Square 3745 W Cortland	18	Committed	No	PRA/PBV in the Logan Square community, for families.	
Englewood Family House 901 W 63rd Street	7	Committed	No	PRA/PBV in the Englewood community, for homeless families.	
Lawrence & Ravenswood Apts 1825 W Lawrence	17	Committed	No	PRA/PBV in the Uptown community, for families.	
Lawson House 30 W Chicago	100	Committed	No	PRA/PBV in the Near North community, for individuals experiencing homelessness.	
New City Apartments Schiller & Halsted	24	Committed	No	PRA/PBV in the Near North community, for families.	
Humboldt Park Residence (LUCHA) 1152 N Christiana	8	Leased	No	PRA/PBV in the Humboldt Park community, for families. Additional units added to existing HAP contract.	
Total	193				
TOTAL	2,493				

<sup>\*</sup>former PH units converted to RAD PBVs

### iv. Planned Existing Project-Based Vouchers

CHA plans to administer 11,916 PBVs, including 6,052 former PH units converted to RAD1 PBVs and RAD1 transfer of assistance units.

FY2021 Planned Existing Project-Based Vouchers						
Property Name	Number of Existing Vouchers To Be Project-Based	Planned Status at End of Plan Year	RAD?	Description of Project		
PRA/PBV	•	•	•	•		
1850 S Racine Apartments	9	Committed	No	PRA/PBV in the Lower West Side community, for families & individuals.		
3225 W 111th Street LLC (formerly Mt. Greenwood Estates)	1	Leased	No	PRA/PBV in the Mount Greenwood community, for disabled individuals.		
3714-16 W Wrightwood Apts	5	Leased	No	PRA/PBV in the Logan Square community, for families & individuals.		
5150 Northwest Highway	30	Leased	No	PRA/PBV in the Jefferson Park community, for families and individuals		
5751 S Michigan Inc (Harriet Tubman Apts)	11	Leased	No	PRA/PBV in the Washington Park community, for families.		
5801 S Michigan LLC (Sojourner Truth Apartments)	23	Leased	No	PRA/PBV in the Washington Park community, for families.		
5840 S Dr Martin Luther King Dr	4	Leased	No	PRA/PBV in the Washington Park community, for homeless families & individuals.		
600 S Wabash Apartments	71	Leased	No	PRA/PBV in the Loop community, for homeless individuals.		
65th Infantry Regiment Veterans Housing	11	Leased	No	PRA/PBV in the West Town community, for veterans.		
65th Infantry Regiment Veterans Housing	37	Leased	No	PRA/PBV in the West Town community, for VASH-eligible families.		
9000 S Justine LLC (formerly 90th Street Development)	4	Leased	No	PRA/PBV in the Washington Heights community for families & individuals.		
Access Housing Multiple Locations	38	Leased	No	PRA/PBV in the Hermosa, Humboldt Park, Logan Square and West Town communities, for disabled families & individuals.		

Anchor House 1230 W 76th St	108	Leased	No	PRA/PBV in the Auburn Gresham community, for families & individuals.
Archer Avenue Senior Residences 2928 S Archer	12	Leased	No	PRA/PBV in the Bridgeport community, for seniors 62+.
Bettendorf Place 8425 S Saginaw	18	Leased	No	PRA/PBV in the South Chicago community, for homeless individuals with HIV/AIDS.
Boulevard Apartments Multiple Locations	12	Leased	No	PRA/PBV in the Logan Square community, for families & individuals.
Boxelder Court 6205-6215 S Langley	6	Leased	No	PRA/PBV in the Woodlawn community, for families.
Brainerd Apartments 8920 S Loomis	9	Leased	No	PRA/PBV in the Washington Heights community, for families & individuals.
Branch of Hope 5628-5630 S Halsted	58	Leased	No	PRA/PBV in the Englewood community, for families & individuals.
Bryn Mawr Apartments 5550 N Kenmore	10	Leased	No	PRA/PBV in the Edgewater community, for families & individuals.
Buffett Place 3208 N Sheffield	51	Leased	No	PRA/PBV in the Lakeview community, for disabled individuals.
Butler Lindon Apartments 6146 S Kenwood	6	Leased	No	PRA/PBV in the Woodlawn community, for homeless persons
Carling LLC 1512 N LaSalle	39	Leased	No	PRA/PBV in the Near North community, for individuals.
Casa Veracruz Multiple Locations	60	Leased	No	PRA/PBV in the Lower West Side community, for families.
Clark Estes Apartments 7070 N Clark	15	Leased	No	PRA/PBV in the Rogers Park community, for families
Crestwood Apartments 525 N Austin Blvd.	57	Leased	No	PRA/PBV located in the community area, Austin, for seniors 55+.
Crowder Place Apartments 3801 N Pine Grove	16	Leased	No	PRA/PBV in the Lakeview community, for seniors 62+.
Deborah's Place II 1530 N Sedgwick	39	Leased	No	PRA/PBV in the Near North Side community, for homeless female individuals.
Devon Place 1950 W Devon	16	Leased	No	PRA/PBV in the West Ridge community, for families & individuals.
Diversey Manor 3213-3223 W Diversey/ 2749-2761 N Sawyer	50	Leased	No	PRA/PBV in the Logan Square community, for families & individuals.
Drex 8031 LLC 8031-8035 S Drexel	12	Leased	No	PRA/PBV in the Logan Square community, for families & individuals.
East Park Apartments 3300 W Maypole	150	Leased	No	PRA/PBV in the East Garfield Park community, for individuals.
Eleven40 Apartments 1140 S Wabash	10	Committed	No	PRA/PBV in the Near South community, for individuals.
Englewood Permanent Supportive Housing 901 W 63rd St	50	Leased	No	PRA/PBV in the Englewood community, for homeless individuals.
Evergreen Towers 1343 N Cleveland	10	Leased	No	PRA/PBV in the Near North community, for seniors 62+.
Focus Apartments 165 N Central	10	Leased	No	PRA/PBV in the Austin community, for justice-involved men.
G&A Senior Residences at Eastgate Village 300 E 26th St	35	Leased	No	PRA/PBV in the Near South Side community, for seniors 62+.
G&A Senior Residences at Ravenswood 1818 W Peterson	37	Leased	No	PRA/PBV in the West Ridge community, for seniors 62+.

G&A Senior Residences at West Ridge 6142 N California	19	Leased	No	PRA/PBV in the West Ridge community, for seniors 62+.
Greenwood Courts 4433-4437 S Greenwood	9	Leased	No	PRA/PBV in the Kenwood community, for families.
Hancock House 12045 S Emerald	18	Leased	No	PRA/PBV in the West Pullman community, for seniors 62+.
Harvest Commons Apartments 1519 W Warren Blvd	89	Leased	No	PRA/PBV in the Near West Side community, for homeless individuals.
Heartland Garden View 1235 S Sawyer	16	Leased	No	PRA/PBV in the Lawndale community, for families living with HIV/AIDS.
Heartland Phoenix House 1251 W Sawyer	32	Leased	No	PRA/PBV in the Lawndale community, for families living with HIV/AIDS.
Hilliard Homes I & II 2111 S Clark	80	Leased	No	PRA/PBV in the Near South Side community, for seniors 62+.
Hilliard Homes II 30 W. Cerrmak	80	Leased	No	PRA/PBV in the Near South Side community, for seniors 62+.
Hollywood House 5700 N Sheridan	51	Leased	No	PRA/PBV in the Edgewater community, for seniors 62+.
HOME (Nathalie Salmon/Blackhawk Manor) 4955 W. Medill Ave/2317 N. Lavergne/7320 N. Sheridan	8	Leased	No	PRA/PBV in the Belmont Cragin and Rogers Park communities, for seniors 62+.
Hope Manor Apartments I 3053 W Franklin	30	Leased	No	PRA/PBV in the Humboldt Park community, for male veterans.
Hope Manor Apartments II 815-823 W 60th St/6000- 6030 S Green/6002 S Halsted	73	Leased	No	PRA/PBV in the Englewood community, for veterans–families & individuals.
Howard Apartments 1567-1569 N Hoyne	12	Leased	No	PRA/PBV in the West Town community, for individuals.
Humboldt House 1819 N Humboldt	31	Leased	No	PRA/PBV in the Logan Square community, for families & individuals with a diagnosed mental illness.
Humboldt Park Residence 1152 N Christiana	28	Leased	No	PRA/PBV in the Humboldt Park community, for individuals.
Illinois Accessible Housing Initiative Multiple Locations	46	Leased	No	PRA/PBV in the Lakeview, Bridgeport, Edgewater, Hyde Park, Near South and New City communities, for disabled families & individuals.
Independence Apartments (West Side Village Phase V) 924 S Lawndale/ 925-35 S Independence	9	Leased	No	PRA/PBV in the North Lawndale community, for families & individuals.
Ironwood Courts 6019-29 S Indiana	14	Leased	No	PRA/PBV in the Washington Park community, for families.
Ivy Park Homes Dan Ryan Expwy & W 91st St	3	Leased	No	PRA/PBV in the Roseland community, for families & individuals.
Jade Garden Apartments 330-338 W Cermak Rd/2156-2162 S Tan Ct	31	Leased	No	PRA/PBV in the Armour Square community, for families.
Jarvis Apartments 2049-2051 W Jarvis	4	Leased	No	PRA/PBV in the Rogers Park community, for families.
Karibuni Place 8200 S Ellis	11	Leased	No	PRA/PBV in the Chatham community, for homeless individuals.
Kenmore Plaza Apartments 5225 N Kenmore	105	Leased	No	PRA/PBV in the Edgewater community, for seniors 62+.
King Legacy LLP 3800-3814 W 16th St/1550- 1556 S Hamlin Ave/1549- 1555 S Avers Ave	10	Leased	No	PRA/PBV in the North Lawndale community, for families.

Lake Street Studios 727 W Lake	61	Leased	No	PRA/PBV in the Near West community, for individuals.
Lake Village East 4700 S Lake Park/1350- 1360 E 47th Pl	65	Leased	No	PRA/PBV in the Kenwood community, for families & individuals.
Leigh Johnson Courts 1034-1112 E 73rd St/ 7227-7239 S Dobson	18	Leased	No	PRA/PBV in the Greater Grand Crossing community, for families.
Leland Apartments (VASH) 1207 W Leland	14	Leased	No	PRA/PBV in the Uptown community, for families & individuals.
Leontyne Apartments E 43rd St & S Vincennes Ave	14	Leased	No	PRA/PBV in the Grand Boulevard community, for families & individuals.
Levy House 1221 W Sherwin	36	Leased	No	PRA/PBV in the Rogers Park community, for seniors 62+.
Liberty Square S Central Park Blvd & W Harrison St	16	Leased	No	PRA/PBV in the East Garfield Park community, for families & individuals.
Lincoln Park Community Shelter (PSH) 1521 N Sedgwick	20	Leased	No	PRA/PBV in the Near North community, for homeless individuals.
Los Vecinos Apartments 4250 W North Ave.	11	Leased	No	PRA/PBV in the Humboldt Park community, for homeless individuals.
Luxe Properties Multiple Properties	6	Leased	No	PRA/PBV in the East Garfield Park community, for families.
Lyndale Place 2569-2575 W Lyndale/ 2207-2221 N Rockwell	32	Leased	No	PRA/PBV in the Logan Square community, for families & individuals.
Major Jenkins 5016 N Winthrop	76	Leased	No	PRA/PBV in the Humboldt Park community, for homeless individuals.
Maple Pointe Apartments 150 W Maple	116	Leased	Yes	PRA/PBV in the Near North community, for families & individuals.
Mark Twain Apartments 111 W Division	148	Leased	No	PRA/PBV in the Near North community area, for individuals.
Marshall 1232 LLC 1216 N LaSalle	90	Leased	No	PRA/PBV in the Near North Side community, for individuals.
Midwest Apartments LP 6 N Hamlin	32	Leased	No	PRA/PBV in the West Garfield Park community, for individuals.
Milwaukee Avenue Apts 3064 N Milwaukee	11	Leased	No	PRA/PBV in the Avondale community, for disabled families.
Montclare Senior Residences of Avalon Park Phase I 1210 E 78th St	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 416 W Barry	15	Leased	No	PRA/PBV in the Lakeview community, for seniors 62+.
Near North Apartments (aka Schiff Residence) 1244 Clybourn Ave	46	Leased	No	PRA/PBV in the Near North Side community, for individuals.
New Mom's Transformation Project 5317 W Chicago	40	Leased	No	PRA/PBV in the Austin community, for single mothers (age 18-24) with children.
North & Talman III 1605-1619 N Washtenaw	8	Leased	No	PRA/PBV located in the West Town community, for families & individuals.
North Park Village Apartments 5801 N Pulaski	81	Committed	No	PRA/PBV in the North Park community, for seniors age 62+
Park Apartments 202-224 E Garfield Blvd/5447 S. Indiana/5446- 50 S Prairie/5732 S Calumet	30	Leased	No	PRA/PBV in the Washington Park community, for families & individuals.

Paseo Boricua Arts Building 2709-15 W Division	6	Committed	No	PRA/PBV in the West Town community, for families and individuals.
Phoenix House LLC Heartland Housing 1251 S Sawyer	21	Leased	No	PRA/PBV in the North Lawndale community, for homeless individuals.
Pierce House (La Casa Norte) 3527 W North Ave	25	Leased	No	PRA/PBV in the Logan Square community, supportive housing for homeless aged 18-24.
Pullman Artspace 11143 S Langley	6	Leased	No	PRA/PBV in the Pullman community, for families
Reba Place Fellowship 1528 W Pratt/1545 W Pratt	7	Leased	No	PRA/PBV in the Rogers Park community, for families & individuals.
Renaissance West Apartments 2517 W Fullerton	98	Leased	No	PRA/PBV in the Logan Square community, for individuals.
Roosevelt Road Veterans 2900 W Roosevelt	75	Committed	No	PRA/PBV in the North Lawndale community, for VASH-eligible individuals.
Roosevelt Towers 3440 W Roosevelt	126	Leased	No	PRA/PBV in the North Lawndale community, for seniors 62+.
Rosa Parks Apartments N Central Park & W Chicago	26	Leased	No	PRA/PBV in the Humboldt Park community, for families.
Rosenwald Courts Apartments 4642 S Michigan	60	Leased	No	PRA/PBV in the Grand Boulevard community, for seniors 62+.
San Miguel 907 W Argyle	14	Leased	No	PRA/PBV in the Uptown community, for families & individuals.
Sankofa House 4041 W Roosevelt	36	Leased	No	PRA/PBV in the North Lawndale community, for families & individuals
Sarah's on Sheridan 4838 N Sheridan	29	Committed	No	PRA/PBV in the Uptown community, for homeless individuals & families
Senior Suites at Auburn Gresham 1050 W 79th St	17	Leased	No	PRA/PBV in the Auburn Gresham community, for seniors 62+.
Sheffield Development 2700 N Sheffield	50	Committed	No	PRA/PBV in the Lincoln Park community, for families.
South Park Plaza S Dr Martin Luther King Jr Dr & E 26th St	34	Leased	No	PRA/PBV in the Douglas community, for families & individuals.
St Andrews Court Apartments 50 N Hoyne	30	Leased	No	PRA/PBV in the Logan Square community, for justice-involved individuals.
St Edmunds Courts 5921-5937 S Wabash	10	Leased	No	PRA/PBV in the Washington Park community, for families.
St Leo Residence 7750 S Emerald	50	Leased	No	PRA/PBV in the Auburn Gresham community, for homeless, disabled veterans.
St Leo Residence (VASH) 7750 S Emerald	40	Leased	No	PRA/PBV in the Auburn Gresham community, for homeless, disabled veterans.
Sunnyside Kenmore Apartments 4130 N Kenmore/ 847-849 W Sunnyside	10	Leased	No	PRA/PBV in the Uptown community, for families.
The Douglass (aka Eastwood Garden) 6531 S Lowe	47	Leased	No	PRA/PBV in the Englewood community, for families & individuals
The Resurrection Home 1920 S Albany/ 2124 W 19th St	5	Leased	No	PRA/PBV in the Lower West Side community area, for families.
The Suites of Autumn Green at Wright Campus 4255 N Oak Park Ave	8	Leased	No	PRA/PBV in the Dunning community, for seniors 55+.

Thresholds at Casa De Troy 6355-6357 S Troy/ 3116-3120 W 64th St	16	Leased	No	PRA/PBV in the Chicago Lawn community, for families & individuals with a diagnosed mental illness.
Thresholds at Edgewater Shores 5326 N Winthrop	8	Leased	No	PRA/PBV located in the Edgewater community, for individuals with a diagnosed mental illness.
Thresholds RAD LLC (Austin Apartments) 334 N Menard	5	Leased	No	PRA/PBV in the Austin community, for homeless, disabled individuals
Threholds RAD LLC (Grais Apartments) 6808 N Wayne	4	Leased	No	PRA/PBV in the Rogers Park community, for individuals with mental illness
Threholds RAD LLC (Rowan Tree Apartments) 500 W Englewood	6	Leased	No	PRA/PBV in the Englewood community, for individuals with mental illness
Tierra Linda Apartments (LUCHA) Multiple Properties	14	Leased	No	PRA/PBV in the Logan Square community, for families & individuals.
Town Hall Apartments 3600 N Halsted	79	Leased	No	PRA/PBV in the Lakeview community, for seniors 55+ / LGBT-Friendly.
Trumbull Apartments 1310-1314 S Spaulding/ 1428 S Trumbull	13	Leased	No	PRA/PBV in the North Lawndale community, for homeless families.
Veterans New Beginnings 8140 S Racine	48	Leased	No	PRA/PBV in the Auburn Gresham community, for homeless veterans.
Victory Centre of South Chicago 9233 S Burley	18	Leased	No	PRA/PBV in the South Chicago community, for seniors 62+.
Wabash Apartments 23-31 E 61st St/ 6100-6108 S Wabash	24	Leased	No	PRA/PBV in the Washington Park community, for homeless families.
Warren Apartments 3-11 N Ashland	21	Leased	No	PRA/PBV in the Near West community, for families and individuals.
Washington Park Apartments 5000 S Indiana	32	Leased	No	PRA/PBV in the Grand Boulevard community, for homeless individuals.
West Humboldt Place 3543 W Chicago	4	Leased	No	PRA/PBV in the Humboldt Park community, for families with a child with HIV/AIDS.
Wilson Yard Family Apartments 1026 W Montrose	16	Leased	No	PRA/PBV in the Uptown community, for families & individuals.
Wilson Yard Senior Apartments	20	Leased	No	PRA/PBV in the Uptown community, for seniors 62+.
1032 W Montrose Winterberry Place 321-325 E 48th St/ 4802-4806 S Calumet	6	Leased	No	PRA/PBV in the Grand Boulevard community, for families & individuals.
Wrightwood Apartments 3821 W Wrightwood	4	Leased	No	PRA/PBV in the Logan Square community, for families.
Wrightwood Senior Apartments 2815 W 79th St	17	Leased	No	PRA/PBV in the Ashburn community, for seniors 62+.
Xavier Apartments 625 W Division	24	Leased	No	PRA/PBV in the Near North Side community, for families & individuals.
Zapata Apartments 3734 W Cortland/3503 W Armitage/1955 N St. Louis/3230 W Armitage	18	Leased	No	PRA/PBV in the Logan Square community, for families.
	4,234			
RAD1/PBV	1	I	l	•
Aurea Martinez Apartments 5525 W Diversey	45	Leased	Yes	RAD1 in the Belmont Cragin community, for families & individuals.

Caroline Hedger* 6400 N Sheridan	450	Leased	Yes	RAD1 in the Rogers Park community, for seniors 62+.
Concord at Sheridan 6438 N Sheridan	65	Leased	Yes	RAD1 in the Rogers Park community, for families & individuals.
Daniel H Burnham* 1930 W Loyola	178	Leased	Yes	RAD1 in community area, West Ridge, for seniors 62+.
Edith Spurlock Sampson* 2640 & 2730 N Sheffield	386	Committed	Yes	RAD1 in the Near North community, for seniors 62+.
Elizabeth Davis Apartments* 440 N Drake	148	Leased	Yes	RAD1 in the Humboldt Park community, for seniors 62+.
Ella Flagg Young Apts* 4645 N Sheridan	235	Committed	Yes	RAD1 in the Uptown community, for seniors 62+.
Emmett Street TOD Project 2602-2638 N Emmett	50	Committed	Yes	RAD1 in the Logan Square community, for families
Fannie Emanuel* 3916 W Washington Blvd	180	Leased	Yes	RAD1 in the West Garfield Park community, for seniors 62+.
Hattie Callner Apartments* 855 W Aldine	144	Leased	Yes	RAD1 in the Lakeview community, for seniors 62+.
Ickes Phase 1A 2420 S State	34	Committed	Yes	RAD1 in the Near South community, for families.
Ickes Phase 1B 2420 S State	34	Committed	Yes	RAD1 in the Near South community area, for families.
Independence Apartments 4022 N Elston	30	Leased	Yes	RAD1 in the Irving Park community, for seniors 62+.
John Pennycuff Memorial Apts 2037 N Milwaukee	47	Leased	Yes	RAD1 in the Logan Square community, for families & individuals.
Judge Fisher Apartments* 5821 N Broadway	197	Leased	Yes	RAD1 in the Edgewater community, for seniors 62+.
Judge Green* 4030 S Lake Park Ave	150	Leased	Yes	RAD1 in the Oakland community, for seniors 62+.
Judge Slater* 4218 S Cottage Grove/ 740 E 43rd St	402	Leased	Yes	RAD1 in the Grand Boulevard community, for seniors 62+.
Kenneth Campbell Apartments* 6360 S Minerva	163	Leased	Yes	RAD1 in the Woodlawn community, for seniors 62+.
Las Americas Apartments* 1611 S Racine	209	Leased	Yes	RAD1 in the Lower West Side community, for seniors 62+.
Lathrop 1A Clybourn & Diversey	151	Leased	Yes	RAD1 in the Lincoln Park community, for families & individuals
Levy House 1221 W Sherwin	20	Committed	Yes	RAD1 in the Rogers Park community, for seniors 62+.
Lincoln Perry Apartments* 243 E 32nd St/ 3245 S Prairie	442	Leased	Yes	RAD1 in the Douglas community, for seniors 62+.
Long Life Apartments* 344 W 28th Place	113	Leased	Yes	RAD1 in the Armour Square community, for seniors 62+.
Lorraine Hansberry* 5670 W Lake	166	Leased	Yes	RAD1 in the Austin community, for seniors 62+.
Major Robert Lawrence Apartments* 655 W 65th St.	191	Leased	Yes	RAD1 in the Englewood community, for seniors 62+.
Maudelle Brown Bousfield Apartments* 4949 S Cottage Grove	91	Committed	Yes	RAD1 in the Kenwood community, for seniors 62+.
Minnie Riperton* 4250 S Princeton	336	Leased	Yes	RAD1 in the Fuller Park community, for seniors 62+.
Northtown Apartments 2410 W Pratt	30	Leased	Yes	RAD1 in the West Ridge community, for seniors.

Oso Apartments 3435 W Montrose	32	Leased	Yes	RAD1 in the Albany Park community, for families.
Parkside 4 Phase 2 1029 N Cleveland	54	Committed	Yes	RAD1 in the Near North community, for families.
Patrick Sullivan* 1633 W Madison	478	Leased	Yes	RAD1 in the Near West Side community, for seniors 62+.
Ravenswood Senior Living Apartments 4501 N Winchester	74	Committed	Yes	RAD1 in the Lincoln Square community, for seniors.
Schneider Apartments* 1750 W Peterson	174	Leased	Yes	RAD1 in the Edgewater community, for seniors 62+.
Villages of Westhaven* Damen & Madison	95	Leased	Yes	RAD1 in the Near West Side community, for families & individuals.
Vivian Carter Apartments* 6401 S Yale	221	Leased	Yes	RAD1 in the Englewood community, for seniors 62+.
Vivian Gordon Harsh* 4227 S Oakenwald	123	Leased	Yes	RAD1 in the Oakland community, for seniors 62+.
William Jones Apartments* 1447 S Ashland	114	Leased	Yes	RAD1 in the Near West Side community, for seniors 62+.
	6,052			
RAD2/PBV	<u> </u>		•	
Butler Lindon Apartments 6146 S Kenwood	5	Leased	Yes	RAD2 in the Woodlawn community, for homeless individuals.
Deborah's Place III 2822 W Jackson	90	Leased	Yes	RAD2 in the East Garfield Park community, for homeless female individuals.
Eddie Mae & Alex Johnson Apartments 6230 S Dorchester	29	Leased	Yes	RAD2 in the Woodlawn community, for homeless individuals.
Thresholds RAD LLC (Austin Apartments) 334 N Menard	52	Leased	Yes	RAD2 in community area, Austin, for homeless, disabled individuals.
Thresholds RAD LLC (Grais Apartments) 6808 N Wayne	41	Leased	Yes	RAD2 in the Rogers Park community area community area for individuals with mental illness
Thresholds RAD LLC (Rowan Trees Apartments) 500 W Englewood Ave	40	Leased	Yes	RAD2 in the Englewood community area for individuals with mental illness.
	257			
City-State/PBRA	<u> </u>		•	
Harrison Courts 2910-2950 W Harrison	122	Leased	No	City-State existing family housing units in the East Garfield Park community
Lathrop Elderly 2717 N Leavitt	91	Leased	No	City-State existing family housing in the Lincoln Park community
Loomis Courts 1314-1342 W 15th St	124	Leased	No	City-State existing family housing in the Near West Side community
	337			
Mod-Rehab/PBV				
16 N Lorel	23	Leased	No	Mod Rehab located in the Austin community, for families & individuals
4240-4248 S Michigan	42	Leased	No	Mod Rehab located in the Washington Park community, for families & individuals
4441-47 S Greenwood	32	Leased	No	Mod Rehab located in the community area, Kenwood, for families & individuals

Austin Village 431-439 N Central Ave.	29	Leased	No	Mod Rehab located in the community area, Austin, for families & individuals
Belray Apartments 3150 N Racine	70	Leased	No	SRO located in the community area, Lake View, for homeless individuals
Carlton/Magnolia Apartments 4626 N Magnolia	70	Leased	No	SRO located in the community area, Uptown, for homeless individuals
Dickens Apartments 3621-3629 W Dickens	34	Leased	No	Mod Rehab located in the community area, Kenwood, for families & individuals
Holland House 240 W 107th Pl	70	Leased	No	SRO located in the community area, Roseland, for homeless individuals
Karibuni Place 8200 S Ellis	60	Leased	No	SRO in community area, Chatham, for homeless individuals.
Los Vecinos Apartments 4250 W North	50	Leased	No	SRO in community area, Humboldt Park, for homeless individuals.
Mae Suites Apartments 148 N Mayfield	39	Leased	No	SRO located in the community area, Austin, for homeless individuals
Major Jenkins 5012 N Winthrop	80	Leased	No	SRO in community area, Humboldt Park, for homeless individuals.
Pine Central 743-755 N Central	35	Leased	No	Mod Rehab in the Austin community, for families & individuals.
Rebecca Walker 126 S Central	22	Leased	No	SRO located in the community area, Austin, for homeless individuals
Renaissance Partners 3757 S Wabash	100	Leased	No	SRO located in the community area, Douglas, for homeless individuals
Washington Park Apartments 5000 S Indiana	31	Leased	No	SRO in community area, Grand Boulevard, for homeless individuals.
	787			
RHI/PBV				
HOW Evanston 2215 Dempster, Evanston	12	Leased	No	PRA/PBV-RHI in Evanston, for female individuals & families.
Casa Maravilla 2021 S Morgan	15	Leased	No	PRA/PBV-RHI in the Lower West Side community, for seniors 62+.
Casa Morelos 2015 S Morgan	9	Leased	No	PRA/PBV-RHI in the Lower West Side community, for families & individuals.
Colonial Park Apartments Various Locations	60	Leased	No	PRA/PBV-RHI in Park City, for families
Congress Parkway Apt Homes 385-416 Ambassador Dr, Crystal Lake	6	Leased	No	PRA/PBV-RHI in Crystal Lake, for families & individuals
G&A Residences at Spaulding Apts 1750 N Spaulding	9	Leased	No	PRA/PBV-RHI in the Humboldt Park community, for families.
Hope Manor Joliet Veterans Apartments 1331-1361 Eagle St/1330- 1360 Copperfield Ave, Joliet	42	Leased	No	PRA/PBV-RHI in Joliet for veterans-families & individuals
Leland Apartments 1207 W Leland	14	Leased	No	PRA/PBV-RHI in the Uptown community, for families & individuals.
New Mom's Oak Park 206-212 Chicago Ave, Oak Park	14	Leased	No	PRA/PBV-RHI in Oak Park, for female individuals & families
North Avenue Apartments 2654 W North Ave	16	Leased	No	PRA/PBV-RHI in the West Town community, for families & individuals.
Nuestro Hogar 1314-1318 N Karlov/4101- 4103 W Kammerling/3653- 3657 W Wabansia	12	Leased	No	PRA/PBV-RHI in the Humboldt Park community, for families.

Pearl Street 3512 Pearl St, McHenry	12	Leased	No	PRA/PBV-RHI in McHenry, for veterans and disabled individuals	
Wentworth Commons 11045 S Wentworth	10	Leased	No	PRA/PBV-RHI in the Roseland community, for families.	
Woodstock Commons 1400-1475 Commons Dr, Woodstock	18	Leased	No	PRA/PBV-RHI in Woodstock, for families & individuals.	
	249				
TOTAL	11,916				

### Overview of Planned and Existing Project-Based Vouchers in FY2021

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 HUD's RAD program to preserve and create new housing opportunities in the city of Chicago. By the end of FY2021, it is anticipated that a total of 14,409 PBVs will be under AHAP or HAP including 2,493 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 (RAD1)

By the end of FY2021, CHA projects that 8,350 units will be converted to RAD PBVs utilizing Component 1 of HUD's RAD Program. Of that number, 6,052 are existing RAD1 PBVs and 2,300 are new RAD1 PBVs scheduled for delivery in FY2021.

### PRA PBVs

By the end of FY2021, through the PRA Program, CHA plans to subsidize 4,427 housing units through partnerships with developers/owners and service providers. This includes 2,853 high quality affordable housing units to families, seniors and individuals; and 1,574 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 PBRAs

CHA continues to administer 337 project-based rental assistance 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-based 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]

<sup>[1]</sup> For more information on RHI, see MPC's website at www.metroplanning.org.

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 FY2021, CHA plans to 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 FY2021, a total of 249 CHA PBV units are expected to be under HAP contracts in the region through RHI. Of these, 164 units are located outside of the boundaries of Chicago and 85 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 plans to process applications to CHA's PRA/PBV portfolio either through RAD conversions or the standard PRA/PBV selection process. During FY2021, Mod Rehab is projected to assist 887 units.

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

By the end of FY2021, CHA expects to have a total of 5,053 PBV units counted towards unit delivery, including 4,374 PRA PBVs and 679 new construction RAD1 PBVs not previously counted toward unit delivery.

### v. Planned Other Changes to the Housing Stock in FY2021

The following section describes other planned changes to CHA's housing stock during FY2021 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 FY2021

### Planned Disposition Activity

CHA plans to dispose of five parcels in Scattered Site Regions 1, 2 and 4, three parcels in Washington Park, and Blocks 11, 12 and 13 in Altgeld Gardens,

### Long-Term Plan for Offline Units Status

As of Q2 2020, CHA has 1,026 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.

### Additional Planned Capital Maintenance Activity

CHA plans to continue or begin ten capital maintenance projects in FY2021

### Additional Planned Redevelopment Activity

CHA is planning redevelopment activity at multiple sites and anticipates several financial transaction closings in FY2021.

### Planned Disposition Activity for FY2021

PLANNED FY2021 DISPOSITIONS*					
IL Number	Development/ Site	Location	Type of Disposition	Description of Activity	
IL002032000	Scattered Sites, Region 1	1911 N. Sedgwick (6 units)	Fee Simple	Dispose of vacant land for market value	

IL002032000	Scattered Sites, Region 1		3358 N. Cent	tral Park (1 unit)	Fee Simple	Dispose of vacant land for market value	
IL002032000	Scattered Sites, Region 1		3607 W. Ro	oscoe (2 units)		Fee Simple	Dispose of vacant land for market value
IL002034000	Scattered Sites, Region 2		2648 S. Ho	oman (2 units)		Fee Simple	Dispose of vacant land for market value
IL002035000	Scattered Sites, Region 4		7614 S. C	Coles (1 unit)		Fee Simple	Dispose of vacant land for market value
IL002034000	Washington Park		3909-17	<sup>7</sup> S. Indiana		Fee Simple	Dispose of vacant land for market value
IL002054000	Washington Park		659 E. Bowen				Dispose of vacant land for market value.
IL002054000	Washington Park		538 E. Bowen				Dispose of vacant land for market value.
N/A	Altgeld Gardens		Blocks 11, 12 and 13				Possible disposition for all or part of the area for a proposed transit stop for CTA el service and transit-stop related development.
		Northern Boundary	Southern Boundary	Eastern Boundary	Western Boundary		
IL002017000, IL02033	Former Ida B. Wells Homes, Darrow Homes, Well Extension and/or Madden Park Homes	37 <sup>th</sup> Street	39th Street	Langley Avenue	South Rhodes Street	Ground Lease or Fee Simple	CHA plans to ground lease or convey land for the Oakwood shores Phase 3-1 development
IL002001000	ABLA	14 <sup>th</sup> Place	15 <sup>th</sup> Street	Laflin Avenue	Ashland Avenue	Ground Lease or Fee Simple	CHA plans to ground lease or convey land for non-residential use.

<sup>\*</sup>Other disposition activity previously included and approved in annual plans may also be carried out in FY2021.

### Long-Term Plan for Offline Units Status

As of Q2 2020, CHA has 1,026 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. The following is a summary and status of CHA's long-term strategies to address offline units by category as of Q2 2020.

### Units pending redevelopment/planning

As of Q2 2020, 720 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. In FY2020, in consultation with the Near North Working Group, CHA issued a request for qualifications/proposals for the redevelopment of the 438 Frances Cabrini Rowhouses. That solicitation specifically called out the possible historic nature of the property and the need for consultation with the City of Chicago's Assets, Information and Services Department 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.

Additionally, CHA may submit a HUD RAD Public Housing application for the Rowhouses in FY2021 or later depending on the scope of redevelopment activities anticipated for the property or work towards other repositioning of the site. That decision will be made with the selected developer.

• Lathrop Homes – 282 offline units (IL002022000): CHA remains committed to deliver 401 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 were completely rehabilitated in FY2018, including 91 for CHA residents. The remaining units, including 60 for CHA residents, were completed in FY2019. CHA continues to create off-site units in accordance with the Lathrop Homes Agreed Court Order and is working on the next phase of Lathrop on-site, which is expected to start construction in FY2021.

### 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 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 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-rehabbed units. As of Q2 2020, 157 units are offline for capital maintenance.

In FY2021, ten major capital projects are projected to continue or begin. The following is a summary of major capital projects for FY2021.

FY2021 Major Capital Projects						
IL Number	Project/Site	Construction Start	Units Back Online/Available for Leasing	Project Description		
IL002079000	Lorraine Hansberry Apartments (5670 W Lake) RAD Property	August 2020	August 2021	Building Envelope and Façade repairs. Including selective roof repairs, site improvements and interior accessibility upgrades to the ground level/common floor.		

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IL002044000	Patrick Sullivan Apartments (1633 W Madison)	September 2020	September 2021	Building Envelope and Façade repairs. Selective upgrades or repairs to the mechanical, electrical and plumbing systems. Including site improvements, ground floor renovation and accessibility upgrades.
	William Castleman Apartments (4945 N. Sheridan)	October 2020	October 2021	Building Envelope and Façade Repairs. Selective upgrades or repairs to the mechanical, electrical and plumbing systems. Including accessibility upgrades to corridors, trash and laundry rooms.
	Harry Schneider Apartments Phase II	October 2020	October 2021	Reconfiguration, reprogramming and renovation of the buildings ground floor and common spaces. Including accessibility upgrades to corridors, trash and laundry rooms.
IL002072000	Maria Diaz Martinez Apartments (2111 N.Halsted)	November 2020	November 2021	Building Envelope and Façade Repairs. Including site improvements, accessibility upgrades the ground floor and selective repairs, or upgrades to the mechanical, electrical and plumbing systems.
	Kenneth Campbell Apartments (6360 S. Minerva)	November 2020	November 2021	Building Envelope and Façade Repairs. Site improvements and selective upgrades or repairs to the mechanical, electrical and plumbing systems. Interior ground floor renovation including accessibility upgrades.
IL002082000	Zelda Ormes Apartments (116 W Elm)	December 2020	January 2022	Reconfiguration, reprogramming and renovation of the buildings ground floor and common spaces. Including accessibility upgrades to corridors, trash and laundry rooms. Upgrades or repairs to the mechanical, electrical and plumbing systems. Roof Replacement, site improvements and selective envelope and HVAC repairs.
IL002041000	Mahalia Jackson Apartments (9141 & 9177 S. South Chicago)	March 2021	April 2022	Reconfiguration, reprogramming and renovation of the buildings ground floor and common spaces. Including accessibility upgrades to corridors, trash and laundry rooms. Upgrades or repairs to the mechanical, electrical and plumbing systems. Roof Replacement, site improvements and selective envelope and HVAC repairs.
IL002060000	Ella Flagg Young Apartments (4645 N. Sheridan)	June 2021	August 2022	Reconfiguration, reprogramming and renovation of the buildings ground floor and common spaces. Including accessibility upgrades to corridors, trash and laundry rooms. Upgrades or repairs to the

				mechanical, electrical and plumbing systems. Roof Replacement, site improvements and selective envelope/façade and HVAC repairs.
Various	General Renovation of Scattered Sites and Various other Public Housing 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

### Units pending demolition/disposition

Units in this category are pending demolition or disposition and will not come back online. As of Q2 FY2020, there are 5 units offline pending demolition or disposition activity.

### Units used for non-dwelling purposes

As of Q2 FY2020, CHA currently uses 144 units for non-dwelling purposes. CHA continues to evaluate non-dwelling use of units across its portfolio.

### Additional Planned Redevelopment Activity in FY2021

- <u>Cabrini Green</u>: In FY2017, CHA awarded development teams for two sites under the Cabrini Green Development Zone Plan (DZP). CHA and its selected developer plan to obtain the necessary approvals—including low-income housing tax credit allocations—to initiate construction on at least one of these parcels in FY2021.
- <u>Harold Ickes Homes (IL002016000)</u>: 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 FY2021, these phases will deliver approximately 206 total new rental apartments consisting of 68 CHA (RAD transfer of assistance PBV), 26 other affordable and 112 market rate units. Of the 68 CHA units, 4 will be fully accessible and 10 will be adaptable.
- <u>Lakefront Properties Phase II For Sale Development</u>: Lakefront's developer still 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.)
- <u>Lathrop Homes Phase IB</u>: Lathrop's developer plans to close and start construction in FY2021 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.
- <u>Lawndale Complex/Ogden Courts</u>: In FY2019, the development team closed and commenced construction on a new commercial building which is expected to open in early 2021. In FY2021, CHA expects the development team to start the first residential phase which will provide approximately 93 new housing units, including 39 CHA, 49 affordable and 10 market rate units.
- <u>LeClaire Courts:</u> In FY2019, CHA awarded a development team the opportunity to redevelop the LeClaire Courts site. CHA contemplates multiple closings in FY2021 FY2024.

- <u>Emmett Street Project (IL# to be assigned upon closing):</u> In FY2020, CHA worked 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 (RAD transfer of assistance PBV) units projected for delivery in FY2022, 3 will be fully accessible and 7 will be adaptable.
- <u>Oakwood Shores/Former Madden Wells Phase IC For Sale</u>: In FY2020, CHA made 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.
- <u>Park Boulevard/Former Stateway Gardens</u>: 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 a new rental phase in FY2021.
- Parkside of Old Town 4 Phase 2 (also referred to as Phase III)/Former Cabrini (IL# to be assigned upon closing): In early FY2020, 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, 31 affordable 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.
- <u>Ravenswood Senior Living Apartments (formerly The Winchester)</u>: 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.
- <u>Robert Taylor Homes</u>: In FY2021-22, CHA plans to dispose of land formerly part of the Robert Taylor Homes for a new development that may include mixed-used, 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 3B (IL to be assigned): CHA's developer plans to commence construction on the
  next Roosevelt Square rental development in FY2021. The developer successfully applied to the City
  of Chicago for low-income housing tax credits. This development is expected to provide approximately
  225 total new rental units, including 81 for CHA.
- Westhaven Phase IID Rental—Former Henry Horner (IL to be assigned): CHA's developer plans to commence construction on the next Westhaven rental development in FY2021. The developer successfully applied to the City of Chicago for low income housing tax credits. This development plans to provide approximately 96 total new rental apartments including at least 35 for CHA 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 FY2021, CHA may submit application(s) for grant funding for redevelopment and/or planning activities.

### Additional Planned Capital Maintenance Activity in FY2021

- Reprogramming and renovation of the buildings ground floor and common spaces. Including
  accessibility upgrades to corridors, trash and laundry rooms. Roof Replacement and selective
  envelope and HVAC repairs at Las Americas Apartments Continuation.
- Continuation of Elevator Modernization Program throughout portfolio.
  - FY2020 FY2021 Construction Activities to set to start in FY2020 and continue into FY2021 in approximately 32 Senior Housing Buildings and two Non-Dwelling Properties
  - FY 2021 FY2021 Construction Activities set to start in approximately nine Senior Housing Buildings and three Non-Dwelling Properties.
  - Elevator Modernization at Dearborn Homes set to start at the of FY2021.

### vi. General Description of Planned Capital Expenditures in FY2021

### General Description of Planned Capital Expenditures During FY2021

CHA's anticipates a total of \$143.1M in planned capital expenditures for FY2021:

- \$30.0M in planned elevator modernization\* activities and upgrades at various CHA senior locations.
- \$15.0M in planned Major Capital Maintenance & Systems upgrades\* at various CHA locations.
- \$3.6M in planned construction activities and upgrades at various for CHA scattered sites locations
- \$75.0M in construction or planning/pre-development activities for mixed-income/mixed-finance properties, Westhaven IID, Lathrop Phase 1B\*, LeClaire, Emmett Street (FKA Logan Square), Southbridge (FKA Ickes) Phase 1A & 1B\*, Oakwood Shores 508, Roosevelt Square 3B-3C, Ravenswood Senior Living\*, Park Boulevard Phase 3A/3B, Sheffield\*, Sherwin (FKA Levy House), Irene McCoy Gaines, Albany Terrace, Grace Manor Apartments, and other master planning activities.
  - \*\$49.9 million in bond proceeds is anticipated to be used for the projects noted above with asterisks as well as the following additional projects: 4400 Grove Phase 1, Parkside 4 Phase 2.
- \$19.5M in planned construction activities, upgrades and repairs for senior buildings that have transitioned to the Rental Assistance Demonstration (RAD) program.

### Section II-B: Leasing Information

### i. Planned Number of MTW Households Served at the End of FY2021

By the end of FY2021, CHA anticipates serving a total of 54,008 MTW households across HCV, PH and Local Non-Traditional 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	130,224	10,852				
MTW Housing Choice Voucher (HCV) Utilized	511,872	42,656				
Local, Non-Traditional: Tenant-Based***	1,440	120				
Local, Non-Traditional: Property-Based***	0	0				
Local, Non-Traditional: Homeownership***	4,560	380				

### Planned Total Households Served

54,008

- \*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	Funding for City of Chicago Housing Assistance Programs (2017-04)	1,440	120
Property-Based	N/A	N/A	N/A
Homeownership	Choose to Own (CTO) Homeownership Program for Public Housing and HCV (2011-01)	4,560	380
Total Local Non- Traditional Households		6,000	500

### Planned Number of Non-MTW HCV Households Served at the End of FY2021

By the end of FY2021, CHA anticipates serving a total of 9,714 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	15,696	1,308
Mod Rehab	11,052	921
Mainstream 5-Year	1,992	166
RAD	87,828	7,319
Total Non-MTW Households	116,544	9,714

### ii. Description of Anticipated Issues Related to Leasing in FY2021

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers or Local, Non-Traditional Units and Solutions in FY2021			
Housing Program Description of Leasing Issues and Solutions			
	CHA will continue to prioritize the issue of offline units in FY2021 and make additional units available for occupancy as expeditiously as possible.		
MTW Public Housing Program	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 FY2021, 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.
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### Section II-C: Wait List Information

### Overview of Wait Lists

### **Public Housing Wait Lists**

- <u>Family Housing (Site-Based) Wait List:</u> 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 FY2021.
- <u>Scattered Site (Community Area) Wait Lists:</u> 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 FY2021, Scattered Sites (Community Area) Wait Lists will remain open.
- <u>Senior Site-Based Wait Lists</u>: 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 FY2021, all Senior Site-Based Wait Lists will be open and accept applications.

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

<u>HCV Wait List</u>: In FY2021, 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 FY2021.

### i. Wait List Information Anticipated

Wait List Information Projected for the Beginning of FY2021				
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 FY2021
Federal MTW Public Housing Units	Site-Based Family Housing	33,126	Open	Open
Federal MTW Public Housing Units	Program Specific Scattered Site/ Community Area	30,642	Open	Open
Federal MTW Public Housing Units	Site-Based Senior	8,171	Open	Open
Federal MTW Project- Based Voucher Program	Program Specific Project-Based Vouchers	11,480 (RAD only)	Open	Open
Federal MTW Housing Choice Voucher Program	Program Specific Tenant-Based Vouchers	38,000	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 FY2021. 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 FY2021, 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 FY2021

Planned Changes to Wait Lists in FY2021			
Wait List Name Description of Planned Changes to Wait List			
N/A			



## Section Three PROPOSED MTW ACTIVITIES



### Section III: Proposed MTW Activities: HUD Approval Requested

For FY2021, CHA is requesting approval for three new MTW activities:

### Using Voucher Size to Determine Payment Standard (2021-1)

- <u>Description</u>: CHA is proposing to implement an activity that determines payment standard by voucher size irrespective of the size of the unit. For example, a one-bedroom voucher holder who moves into a studio would receive a one-bedroom payment standard as opposed to a studio. This policy would benefit families who move into units smaller than their voucher size "Shopping Down." Existing policy penalizes voucher holders who decide to move into a unit smaller than their voucher and results in additional rent burden. This policy mitigates the increased costs for these families and provides a subsidy solely based on their family composition.
- Implementation Year: FY2021
- Impact Analysis: As of December 31, 2019, there are 1,460 participants who reside in units smaller than their voucher size (i.e. "Shopping Down"). Although only 274 have a gross rent that exceeds the payment standard and would benefit from this policy, these participants have disproportionately high rent burden compared to the overall HCV population. The average monthly increase in HAP for each one of these participants would be approximately \$125 for a total annual increase of approximately \$410,000. In addition to alleviating the rent burdens of those "Shopping Down," this policy would assist voucher holders who were prevented from moving into their preferred unit due to affordability. In 2019, 14 participants attempted to "Shop Down," but the property owner declined the rent offer, due to the participant's affordability, even though the market supported the asking amount.
- Hardship Policy: N/A
- Implementation Plan: CHA plans on implementing this activity in 2021.
- Statutory Objective: MTW Statutory Objective I: Increase housing choices for low-income families.

### Standard Metrics

Standard Metric	Unit of Measurement	Baseline	FY2021 Benchmark
SS-2 Increase in	Total number of participants	In FY2019, 0 participants	274 residents will receive
Household Savings	who reside in a unit smaller than their voucher size where this activity would decrease their rent portion.	payment standard that	standard that results in a

- <u>Data Collection:</u> CHA will collect data on an ongoing basis on the number families who reside in units smaller than their voucher size.
- <u>Authorization:</u> Attachment C, Section D (2)(a) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of 24 C.F.R. 982.503.

### Conducting HQS Inspections for a Sample of Units in Buildings with Substantial Numbers of HCV Voucher Holders (2021-2)

<u>Description</u>: CHA is proposing to implement an activity that requires inspections of a sample of
units every year in buildings with a large number of HCV voucher holders, rather than having all of
them inspected every other year. In determining which owners/buildings would qualify, CHA would

require that they have a history of positive inspection results. This policy would not alter the requirement to conduct initial inspections prior to a voucher holder moving into the unit, or the ability of a tenant to request a complaint inspection. CHA would ensure that units would go no more than four years without a regular inspection. The implementation plan will be phased-in and initially would include the most-qualified candidates to ensure that appropriate procedures are established and to determine the feasibility of moving forward on a larger scale. Moreover, if the majority of units in the building fail HQS then the building will revert back to the normal inspection schedule.

- <u>Implementation Year</u>: FY2021
- Impact Analysis: CHA has identified approximately 75 buildings that fit the general criteria of having a large number of HCV participants with positive inspection results. Implementing this policy would decrease the amount spent on inspections per year. In 2019, the aggregate pass rate of biennial inspections on the first attempt at these buildings was approximately 75%, which is significantly higher than those conducted for the overall HCV population. Therefore, CHA projects that the vast majority of units that don't have an inspection would pass on the first attempt.
- <u>Hardship Policy:</u> There is no need for a hardship policy, as current policy allows a participant to request a complaint inspection at any time.
- Implementation Plan: CHA plans on implementing this activity in 2021.
- <u>Statutory Objective</u>: Statutory Objective III: Reduce Cost and Achieve Greater Cost Effectiveness in federal expenditures.

### Standard Metrics:

Standard Metric	Unit of Measurement	Baseline	FY2021 Benchmark
CE-1 Agency Cost Savings	The decrease in cost associated with the decrease in the number of inspections conducted in the buildings where the policy has been implemented.	In FY2019, CHA spent \$1,950,581 on inspections. decrease inspection costs of \$70,000 (730 inspections X \$96)	CHA will decrease inspections costs by \$70,000 (730 inspections x \$96).
CE-2: Staff Time Savings	The decrease in staff time associated with the decrease in inspections at the buildings where the policy has been implemented.	In FY2019, CHA spent 22,000 staff hours on inspections.	CHA will save 672 staff hours on inspections (730 inspections x .92 hours).

- <u>Data Collection:</u> CHA will collect data on the decrease of the number of inspections required in the buildings where this policy is implemented, and the associated costs.
- <u>Authorization:</u> Attachment C, Section D (5) of the MTW Agreement, which waives certain provisions of Section 8(o) (8) of the 1937 Act and 24 CFR 982 Subpart I.

### Providing a Flat Medical Deduction for all Elderly/Disabled Households

<u>Description</u>: CHA proposes to implement an activity that provides a flat medical deduction of \$400 to all elderly/disabled households. Many families may have medical expenses, but do not receive the deduction because they do not submit the proper documentation. Currently only about 14% of

elderly/disabled households receive a medical deduction. This will remove the burden on participants to obtain and provide the documentation, as well as for staff to calculate the correct amount. Participants that have a medical deduction of more than \$400 will continue to receive their full amount and this activity will have no impact on them.

- <u>Implementation Year</u>: FY2021
- Impact Analysis: Providing a \$400 deduction to all elderly/disabled households will benefit approximately 12,600 voucher holders, which is approximately 29% of the HCV population. It will provide an average reduction in rent portion of \$10 every month and cost CHA approximately \$1.4 million annually.
- <u>Hardship Policy:</u> Participants that have a medical deduction of more than \$400 will continue to receive their full amount and this activity will have no impact on them.
- Implementation Plan: CHA plans on implementing this activity in FY2021.
- Statutory Objective: MTW Statutory Objective I: Increase housing choices for low-income families.

### Standard Metrics

Standard Metric	Unit of Measurement	Baseline	FY2021 Benchmark
SS-2 Increase in	Total number of participants	In 2019, 1,900	12,600 HCV residents will
Household Savings	who receive a flat medical deduction.	participants will receive a medical deduction.	receive a medical deduction from this activity.

• <u>Data Collection:</u> CHA will track the number of participants who receive a medical deduction from this activity.

<u>Authorization:</u> Attachment C, Section D (2)(a) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of 24 C.F.R. 982.503 and Attachment C, Section 11 of the MTW Agreement which waives certain provisions of Section 3(a)(2), 3(a)(3)(A) and Section 6(I) of the 1937 Act and 24 C.F.R 960.255.



# Section Four APPROVED MTW ACTIVITIES



#### 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.
- <u>Description</u>: CHA remains committed to replacing 25,000 housing units as part of the original Plan for Transformation and MTW Agreement obligations. Each year CHA has made 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.
- <u>Update:</u> CHA continues to pursue a variety of unit delivery strategies to achieve the 25,000 unit goal. In FY2021, CHA plans to deliver an additional 119 PH and PBV units to achieve the 25,000unit goal.

Planned Non-Significant Changes: N/A

Planned Significant Changes: N/A

• <u>Planned Changes to Metrics/Data Collection</u>: CHA has updated the FY2021 benchmarks.

Standard Metric	FY2021 Benchmark
HC-1: Additional Units of Housing Made Available	111 units of housing will be made available as a result of this activity
HC-2: Units of Housing Preserved	8 units of housing will be preserved as a result of this activity.

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

- <u>Plan Year Approved, Implemented, Amended:</u> Approved FY2010, Implemented FY2010, Amended FY2014.
- 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 mixedincome 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.

- <u>Update:</u> In FY2021, CHA plans to use the alternate cost formula to deliver four units and to begin construction on two developments with approximately 115 units to be delivered in FY2022. CHA may not use the alternate cost formula for rehabilitation of any units in FY2021.
- Planned Non-Significant Changes: N/A
- <u>Planned Significant Changes</u>: N/A

<u>Planned Changes to Metrics/Data Collection</u>: CHA has updated the FY2021 benchmark.

Standard Metric	FY2021 Benchmark
HC-1: Additional Units of Housing Made Available	4 housing units will be delivered through the use of the alternate TDC formula.
HC-2: Units of Housing Preserved	O 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	O 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 \$1.292,000 and place 1 additional unit under construction at a cost of approximately \$286,316.

Units Planned for FY2021 Delivery that will use MTW TDC	PH Units without MTW TDC	Additional PH Units with MTW TDC	Total PH Units
508 Pershing	16	4	20
Total Units	16	4	20

Developments Planned to Close and be Under Construction in FY2021 using MTW TDC	PH Units without MTW TDC	Additional PH Units with MTW TDC	Total PH Units
Westhaven 2D	37	1	38
Roosevelt Square 3B	81	0	81
Total Units	118	1	119

#### Expedited Public Housing Unit Acquisition Process (2015-01)

- Plan Year Approved, Implemented, Amended: Approved FY2015
- <u>Description</u>: 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.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A

<u>Planned Changes to Metrics/Data Collection:</u> CHA has updated the FY2021 benchmark.

Standard Metric	FY2021 Benchmark
HC-1: Additional Units of Housing Made Available	O 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	O 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
- <u>Description</u>: 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 2020, the minimum rent population (those paying \$75 per month) includes 8,774 households (approximately 18%) of the total HCV population. There are 956 additional

- HCV households (approximately 2% of the total HCV population) in the hardship population, meaning they are paying less than \$75 per month.
- Public Housing: As of March 2020, the minimum rent population (those paying \$75 per month) includes 1,335 (10%) PH households. There are 313 (2%) additional PH households in the hardship population, meaning they are paying less than \$75 per month.
- Planned Non-Significant Changes: N/A

Planned Significant Changes: N/A

Planned Changes to Metrics/Data Collection: CHA has updated the FY2021 benchmark.

Standard Metric	FY2021 Benchmark
CE-5: Increase in Agency Rental Revenue	HCV: 8,950 residents will pay \$75 minimum rent for a total annual contribution of \$8,055,000.
	Public Housing 12,50 households will pay \$75 minimum rent for a total annual contribution of \$1,125,000.

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

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

- <u>Plan Year Approved, Implemented, Amended</u>: Approved FY2011 (expansion to Public Housing), Implemented FY2011, Amended FY2014 (new income eligibility requirement)
- <u>Description</u>: 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. In FY2020, CHA further modified the CTO activity to waive the calculation of equity assets to increase administrative efficiency.
- <u>Update</u>: Now in the 18<sup>th</sup> year of the program, 642 participants have purchased their own home and 281 have assumed their own mortgage.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A.

<u>Planned Changes to Metrics/Data Collection</u>: CHA has updated the benchmarks for FY2021.

Standard Metric	Unit of Measurement	Baseline	FY2021 Benchmark
SS-5: Households Assisted by Services that Increase Self- Sufficiency	Number of households receiving services aimed to increase self-sufficiency (increase).	O families enrolled under new income requirements.	35 families will enroll under new income requirements.
SS-8: Households Transitioned to Self-Sufficiency*	Number of households transitioned to self-sufficiency (increase).	O families purchased homes before this activity was approved.	35 families (33 HCV and 2 PH) will purchase homes.
HC-6: Increase in Homeownership Opportunities	Number of households that purchased a home as a result of the activity (increase).	O families purchased homes before this activity was approved.	35 families (33 HCV and 2 PH) will purchase homes

<sup>\*</sup>For the SS-8 standard metric tracking, CHA is establishing the purchase of a home through CTO as a definition of self-sufficiency.

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

- Plan Year Approved, Implemented, Amended: FY2014, FY2017, FY2018 and FY2019 updates
- <u>Description</u>: Over the past few years, CHA has modified the Family Self-Sufficiency (FSS) program. These include (from oldest to most recent):
  - o 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.
  - o 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.
- <u>Update</u>: Since the new escrow model went into effect in early FY2018, 99% of participants have completed the amendment to their COP and 564 new participants have enrolled under the new model. In total, there are now 1,076 participants benefitting from the program, or 86% of program slots available.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A
- <u>Planned Changes to Metrics/Data Collection:</u> CHA has updated the benchmarks for FY2021.

Standard Metric	FY2021 Benchmark
SS-1: Increase in Household Income	The average income from wages among FSS participants will remain stable at \$20,000.
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 be redcued to 50.
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	Public Housing The average subsidy per PH household will be \$9,014.64 (based on 13,886 units).
	HCV The average subsidy per HCV household will be \$10,504.92 (based on 48,385 eligible vouchers).
SS-7: Increase in Agency Rental Revenue	Public Housing: The total contribution of PH FSS participants will remain stable at \$1,500,000 (230 households).  HCV The total contribution of HCV FSS participants will remain stable at \$3,000,000 (700 households).
SS-8: Households Transitioned to Self- Sufficiency	60 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
- <u>Description</u>: CHA has implemented a streamlined triennial re-examination schedule for PH and HCV fixed income households consisting of only elder, 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.
- Planned Non-Significant Changes: N/A
- <u>Planned Significant Changes:</u> For HCV participants, CHA proposes to modify this activity to expand those on a triennial re-examination schedule to include households with only near elderly participants (age 55-61) in addition to elderly and disabled participants.
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmarks for FY2021.

Standard Metric	FY2021 Benchmark
CE-1: Agency Cost Savings	HCV: CHA will spend \$870,000 (6,000 reexams x \$145) to administer reexams for fixed-income near elderly/elderly/disabled households who are due for reexams based on the triennial schedule.
	Public Housing: CHA will spend \$79,750 (550 exams x \$145) to administer reexams for fixed income elderly/disabled households who are due for reexams based on the triennial schedule.
CE-2: Staff Time Savings	HCV: CHA will spend 39,000 CHA staff hours (6,000 reexams x 6.5 hours) to administer reexams for fixed income near elderly/elderly/disabled households who are due for reexams based on the triennial schedule.
	Public Housing: CHA will spend 3,575 staff hours (550 reexams x 6.5 hours) to administer reexams for fixed income elderly/ disabled households who are due for reexams based on the triennial schedule.
CE-5: Increase in Agency Rental Revenue	HCV: Fixed income near elder/elderly/disabled households eligible for the triennial re-exam schedule are expected to contribute a year-end total of \$63,741,550 (18,100 households).
	Public Housing: Fixed income elderly/ disabled households eligible for the triennial reexam schedule are expected to contribute a yearend total of \$13,214,550 toward rent and utilities (3,850 households).

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

- <u>Plan Year Approved, Implemented, Amended</u>: Approved FY2014 (Public Housing), Implemented FY2016 (Public Housing), Implemented FY2006 (HCV)
- <u>Description</u>: 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. <sup>1</sup> 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

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<sup>&</sup>lt;sup>1</sup> 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.

#### • Planned Significant Changes: N/A

	a Collection: CHA has updated the benchmarks for FY2021.
Standard Metric	FY2021 Benchmark
CE-1: Agency Cost Savings	HCV: CHA will spend \$2,175,000 (15,000 reexams x \$145) to administer reexams to households who are due for reexams based on the biennial schedule.
	Public Housing: CHA will spend \$253,750 (1,750 reexams x \$145) to administer reexams to households who are due for reexams based on the biennial schedule.
CE-2: Staff Time Savings	HCV: CHA will spend 97,500 staff hours (15,00 reexams x 6.5 hours) on reexams for households due for reexams based on the biennial schedule.
	Public Housing: CHA will spend 11,375 staff hours (1,750 reexams x 6.5 hours) on reexams for households due for reexams based on the biennial schedule.
CE-5: Increase in Agency Rental Revenue	HCV: HCV households who are eligible for biennial reexams will contribute a year-end total of \$145,612,000 (32,350 households).
	Public Housing PH households who are eligible for biennial reexams will contribute a year-end total of \$19,436,800 (3,300 households).
SS-1: Increase in Household Income	HCV: The average income from wages for HCV households eligible for biennial reexams is expected to be \$10,200 at year-end (32,350 households).
	Public Housing: The average income from wages for PH households eligible for biennial reexams is expected to be \$18,050 at year-end (3,300 households).
SS-3: Increase in Positive Outcomes in Employment Status*	HCV: 11,050 work-able HCV heads of household eligible for biennial reexams are expected to have income from wages.
	50% of work-able HCV heads of household eligible for biennial reexams are expected to have income from wages.
	Public Housing: 1,800 work-able PH heads of household eligible for biennial reexams are expected to have income from wages.
	79% of work-able PH heads of household eligible for biennial reexams are expected to have income from wages.

SS-4: Households	HCV:
Removed from Temporary	The number of HCV households eligible for biennial reexams
Assistance for Needy	who receive TANF will remain stable at 1,100.
Families (TANF)	
	Public Housing:
	200 PH households (out of 3,300 eligible for biennial
	reexams) will receive TANF.
SS-8: Households	HCV:
Transitioned to Self-	2,550 HCV households (of 32,350 households eligible for
Sufficiency**	biennial reexams) will move up at least one AMI category.
	Public Housing:
	400 PH households (out of 3,300 eligible for biennial
	reexams) will move up at least one AMI category.

<sup>\*</sup>For SS-3 tracking, CHA defines "work-able households" as those with at least one member age 18 to 54 who is either employed or 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.

#### CHA Re-Entry Pilot Program (2014-04)

- Plan Year Approved, Implemented, Amended: Approved FY2014, Implemented FY2015
- <u>Description</u>: 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).
- <u>Update</u>: As of Q1 2020, there have been 50 participants in the program. CHA utilized all slots as of Q1 2020, with one pending voucher reassignment. Outside of voucher reassignment due to attrition, CHA is no longer enrolling new participants.
- <u>Planned Non-Significant Changes:</u> Now nearing capacity, this program will move into a phase of only reissuing attrition vouchers for the program, while continuing to provide the services outlined in the activity description. Accordingly, we are removing annual metrics that no longer apply.
- Planned Significant Changes: N/A

• Planned Changes to Metrics/Data Collection: CHA has updated the benchmarks for FY2021.

Standard Metric	2021 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.

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

SS-5: Households Assisted by Services that Increase Self-Sufficiency	10 participants will receive services.
SS-6: Reducing Per Unit Subsidy Costs for Participating Households	Public Housing The average subsidy per PH household will be \$9,014.64 (based on 13,886 units).
	HCV The average subsidy per HCV household will be \$10,504.92 (based on 48,385 eligible vouchers).
SS-7: Increase in Agency Rental Revenue	Public Housing: The total contribution of PH families with program participants will be consistent with CHA's average in FY2021.
	HCV: The total contribution of HCV families with program participants will be consistent with CHA's average in FY2021.
SS-8: Households Transitioned to Self- Sufficiency**	O 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.

#### 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)

- <u>Plan Year Approved, Implemented, Amended</u>: Approved FY2009, Implemented FY2009, Amended FY2016
- <u>Description</u>: 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:
  - o 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-reltaed 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. <sup>2</sup>

#### o RAD1 PBVs

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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

<sup>&</sup>lt;sup>2</sup> 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).

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:
  - 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 providerengagement 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 reexamined 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
- <u>Planned Changes to Metrics/Data Collection:</u> CHA has updated the benchmarks for FY2021.

Standard Metric	FY2021 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 \$16,400 (6,250 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.
	65% 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 350.
SS-5: Households Assisted by Services that Increase Self Sufficiency	3,800 PH households with a work-able adult subject to the work requirement are expected to engage with service providers through FamilyWorks.
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 \$33,293,300 (6,250 households.)
SS-8: Households Transitioned to Self- Sufficiency**	57% (3,536 of 6,250) of households subject to the work requirement in a work-able household will have all adults in compliance. Compliance is achieved by either meeting the work requirement or obtaining the exemption from the work requirement.
HC-3: Decrease in Wait List Time	63,768 applicants on PH Family Wait Lists will have an average wait time of 36 months.

<sup>\*</sup>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.

#### Additional Metrics:

Additional Metric	FY2021 Benchmark
	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%:  56.5% compliance 14.8% exempt 22.8% Safe Harbor 4.3% non-compliant 1.6% under legal

<u>Compliant:</u> 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.

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

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

<u>Safe Harbor</u>: 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.

<u>Under Legal</u>: 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.

#### Office of the Ombudsman (2008-01)

- Plan Year Approved, Implemented, Amended: Approved FY2008, Implemented FY2008
- <u>Description</u>: 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, answered, 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.

- <u>Update</u>: 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.
- <u>Planned Non-Significant Changes</u>: N/A
- Planned Significant Changes: N/A

Planned Changes to Metrics/Data Collection: CHA has updated the benchmarks for FY2021.

Standard Metric	FY2021 Benchmark
SS-5: Households Assisted by Services that Increase Self-Sufficiency	600 residents will engage through the Office of the Ombudsman.

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

#### Additional Metrics:

Additional Metric	FY2021 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)

- <u>Plan Year Approved, Implemented, Amended</u>: Approved FY2010, Implemented FY2010, Amended FY2018, Amended FY2019
- <u>Description</u>: 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 impact 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 FY2021.

Standard Metric	FY2021 Benchmark
HC-5: Increase in Resident Mobility	6,145 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. Previously, units participating in the Inspection Excellence Program (IEP) were eligible to receive vacancy payments. In the HCV program's marketing and communications, CHA is no 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.

- <u>Update</u>: As of June 2020, there were 3 vacancy payments at a total cost of \$5,634. 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: N/A
- Planned Significant Changes: N/A
- Planned Changes to Metrics/Data Collection: CHA has updated the benchmarks for FY2021.

Standard Metric	FY2021 Benchmark
HC-2: Units of Housing Preserved	6 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
- <u>Description</u>: 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.

- <u>Update</u>: 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 FY2021.

Standard Metric	FY2021 Benchmark
CE-1 Agency Cost Savings	CHA will spend \$12,180 on calculating assets (812 exams x \$15).
CE-2: Staff Time Savings	CHA will spend 276 staff hours on asset calculations for all re-
	examination types (812 exams x .34 hours).

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

- Plan Year Approved, Implemented, Amended: Approved FY2017, Implemented FY2017
- <u>Description</u>: 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.

In FY2020, CHA began limiting 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 with this modification.

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.

- <u>Update</u>: In FY2020, CHA began limiting the LIP to only those new owners who lease new units in Mobility Areas, which will result in a reduction in costs. CHA anticipates spending approximately \$450,000 annually on this activity.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A

• Planned Changes to Metrics/Data Collection: The benchmark has been updated for FY2021.

Standard Metric	Unit of Measurement	Baseline	FY2021 Benchmark
HC-5: Increase in	Number of households	In FY2015, CHA had a	CHA anticipates that 269
Resident Mobility	able to move to a	total of 586 move into	households will move into
	neighborhood of	Opportunity Areas.	Mobility Areas as a result of this
	opportunity as a result		activity.
	of this activity.		

#### 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.
- <u>Update:</u> 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 FY2021.

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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)

- <u>Plan Year Approved, Implemented, Amended</u>: Approved FY2018, Implemented FY2018, Amended FY2019
- <u>Description</u>: 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.

- <u>Update</u>: 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
- <u>Planned Significant Changes</u>: 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
- <u>Description</u>: 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.
- <u>Update</u>: CHA will continue to identify opportunities to increase the number of PBV units in family properties with new contracts and existing contract renewals in FY2021.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A

Planned Changes to Metrics/Data Collection: CHA has updated the benchmarks for FY2021.

Standard Metric	FY2021 Benchmark
HC-1: Additional Units of Housing Made Available	20 additional PBV units will be made available by exceeding 25% in family PBV properties.
HC-2: Units of Housing Preserved	O 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)

- <u>Plan Year Approved, Implemented, Amended</u>: Approved FY2011, Implemented FY2011, Amended FY2018
- <u>Description</u>: 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.

• <u>Update</u>: 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 FY2021.

Standard Metric	FY2021 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

#### Acceptance of City Certificates of Occupancy for Initial PRA Inspections (2011-06)

- Plan Year Approved, Implemented, Amended: Approved FY2011, Implemented FY2011
- <u>Description</u>: 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.
- <u>Update</u>: 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 2021.

Standard Metric	FY2021 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	O hours of staff time will be dedicated to initial PRA inspections for new construction and substantial rehab units. (O 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
- <u>Description</u>: 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.

- <u>Update</u>: 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
- <u>Planned Significant Changes</u>: N/A

Planned Changes to Metrics/Data Collection: CHA has updated the benchmark for FY2021.

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Standard Metric	FY2021 Benchmark	
HC-1: Additional Units of Housing Made Available	20 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:
- <u>Description</u>: 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.

- <u>Update:</u> In FY2021, 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
- <u>Planned Significant Changes:</u> N/A

Planned Changes to Metrics/Data Collection: CHA has updated the benchmark for FY2021.

Standard Metric	FY2021 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
- <u>Description</u>: 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.
- <u>Update</u>: CHA implemented this activity in FY2017 and implementation will be ongoing through FY2021.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A

Planned Changes to Metrics/Data Collection: CHA updated the benchmarks for FY2021.

Standard Metric	FY2021 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.	

<sup>\*</sup>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.

## 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

<sup>\*\*</sup>RAD conversions are currently take place at primarily senior properties.

- <u>Description</u>: 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.
- <u>Update</u>: CHA implemented this activity in FY2017 and implementation will be ongoing through FY2021.

<u>Planned Non-Significant Changes</u>: N/A

• Planned Significant Changes: N/A

• Planned Changes to Metrics/Data Collection: CHA has updated the benchmark for FY2021.

Standard Metric	FY2021 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
- <u>Description</u>: 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.

- <u>Update</u>: CHA implemented this activity in FY2017 and implementation is ongoing throughout FY2020.
- Planned Non-Significant Changes: N/A
- Planned Significant Changes: N/A

<u>Planned Changes to Metrics/Data Collection:</u> CHA has updated the benchmark for FY2021.

Standard Metric	FY2021 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.

#### 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
- <u>Description</u>: 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.

- <u>Update</u>: The Center for Health and Housing, as the 3<sup>rd</sup> party administrator for the program, has received more than 300 referrals and has housed 102 participants as of May 2020. 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 FY2021.

Standard Metric	FY2021 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	120 households will receive services.		
SS-8: Households Transitioned to Self Sufficiency	120 participants will transition to self-sufficiency by becoming housed.		
HC-1: Increasing housing choice	120 units of housing will be made available through CHA funding assistance for this program.		
HC-7: Households Assisted by Services that Increase Housing Choice	120 participants will receive social services that increase housing choice.		

	A	pproved and Implemented MTW Activitie	s 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 Gautreax-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
	<u>'</u>	HCV	l	l
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

Mobility Counseling Demonstration Program Work Requirement (2016-01)

- Plan Year Approved, Implemented, Amended: Approved FY2016, Implemented FY2016
- <u>Description</u>: 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.

• <u>Update</u>: 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 close this activity in the FY2020 MTW Annual Report.

- <u>Planned Non-Significant Changes:</u> CHA has exhausted the list of participants who could take part
  in the demonstration and is not be enrolling any new participants. CHA will close this activity in
  the FY2020 MTW Annual Report.
- Planned Significant Changes: N/A

• <u>Planned Changes to Metrics/Data Collection:</u> 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.	

<sup>\*</sup>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.

#### Section IVD. Closed Out Activities

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

• <u>Description</u>: 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

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

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 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
- <u>Statutory Objective</u>: 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 selfsufficient.
- 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;
  - o Employment/unemployment/or under-employment issues;
  - o Past performance of participant and adherence to Demonstration program requirements;
  - o Previous participation in CHA-sponsored or referred services and/or programs; and
  - o 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.

 <u>Update:</u> 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.

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

 <u>Description</u>: 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.

• <u>Implementation Year</u>: FY2012

- Statutory Objective:
- <u>Update</u>: Due to the administrative challenge of establishing a mechanism to identify units eligible and ensure compliance CHA proposes to close this activity.



# Section Five MTW SOURCES AND USES OF FUNDS



#### Section V: MTW Sources and Uses of Funds

This section contains information on CHA's anticipated sources and uses of funding in FY2021.

#### Section VA: Sources and Uses of MTW Funds

#### Estimated Sources of MTW Funding for FY2021

Sources				
FDS Line Item	FDS Line Item Name	Dollar Amount		
70500 (70300+70400)	Total Tenant Revenue	\$61,002,831		
70600	HUD PHA Operating Grants	\$882,583,116		
70610	Capital Grants	\$88,758,701		
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$1,438,991		
71100+72000	Interest Income	\$3,250,000		
71600	Gain or Loss on Sale of Capital Assets	\$0		
71200+71300+71310+71400+71500	Other Income	\$2,615,406		
70000	Total Revenue	\$1,039,649,045		

#### **Explanations of CHA FY2021 MTW Sources:**

• FY2021 estimates for operating subsidies are based on units in PIC at projected per unit rates and HCV Program sources are based on projected FY2021 voucher counts. CHA continues to finalize MTW HCV leasing projections for FY2021.

Estimated Uses of MTW Funding for FY2021

Uses				
FDS Line Item	FDS Line Item Name	Dollar Amount		
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$76,165,337		
91300+91310+92000	Management Fee Expense	\$0		
91810	Allocated Overhead	\$37,097,107		
92500 (92100+92200+92300+92400)	Total Tenant Services	\$36,777,226		
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$18,539,222		
93500+93700	Labor	\$0		
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$122,496,135		
95000 (95100+95200+95300+95500)	Total Protective Services	\$47,122,209		

96100 (96110+96120+96130+96140)	Total insurance Premiums	\$6,538,000
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$28,595,090
96700 (96710+96720+96730)*	Total Interest Expense and Amortization Cost	\$23,626,459
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	Housing Assistance Payments + HAP Portability-In	\$556,273,274
97400	Depreciation Expense	\$91,572,161
97500+97600+97700+97800	All Other Expenses	\$610,000
90000	Total Expenses	\$1,045,412,220

<sup>\*</sup>This includes estimated interest expense on general obligation bonds issued by CHA in FY2018.

#### Explanations of CHA FY2021 MTW Uses

- The estimated Housing Assistance Payments expense is based on 90% voucher utilization in FY2021. CHA continues to finalize MTW HCV leasing projections for FY2021.
- 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.
- CHA plans to fill the projected gap between Estimated Total Revenue and Estimated Total Expenses by using third-party financing.
- In FY2018, CHA issued general obligation bonds in the amount of \$325 million. Of the \$325 million, \$35 million was set aside for 1<sup>st</sup> year debt service and cost of issuance, leaving a balance of \$290 million. At the end of FY2020, CHA estimates it will have spent \$148.3 million of the bond proceeds and will have a remaining balance of \$141.7 million.
  - o In FY2021, CHA anticipates spending \$49.9 million of the remaining balance to fund the following categories of capital projects:
    - Public Housing modernization (\$16 million): elevator modernization, major capital maintenance & system upgrades at Lake Parc Place, Scattered Sites, Alfreda Barnett Duster, Flannery, Armour Square, Ella Flagg Young, Albany Terrace, Irene McCoy Gaines, Mary Jane Richardson Jones, Ada S. Dennison-McKinley and Horner Westhaven.
    - New construction mixed-income/mixed-finance development (\$33.9 million): 4400
       Grove Phase 1, Lathrop Phase 1B, Southbridge (FKA Ickes) Phase 1A & 1B, Parkside 4 Phase 2, Ravenswood Senior Living and Sheffield.
  - 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.
  - 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 Reserves

CHA maintains a \$25 million operating reserve which is within HUD-recommended guidelines. No reserve fund use is budgeted for FY2021.

#### Reconciliation to CHA's 2021 Budget

Total Expenses	\$1,045,412,220
Add back: Depreciation	(\$91,572,161)
Deduct: Capital Expenditures	\$141,102,986
Principal	\$14,100,000
Total Expenses	\$1,109,043,045
Use of Third-Party Financing	\$55,937,000

#### Activities that Use Only 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 FY2021, 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 FY2021.

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 FY2021 ANNUAL PLAN

	FY202	21 Single Fund
CENTRAL OFFICE	\$	94,803,877
<u>OPERATIONS</u>		
<b>Housing Choice Voucher</b>		565,875,810
Property and Asset Management		180,109,450
Resident Services		33,075,112
TOTAL OPERATIONS	\$	779,060,372
CAPITAL		
Capital Repairs and Improvements <b>DEBT SERVICE</b>		70,466,000 -
TOTAL CAPITAL		70,466,000
TOTAL USES	\$	944,330,249

#### <u>Current Support to Families in the Process of Being Relocated</u>

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 FY2021 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 family coaching and workforce development services, as well as select services to other HCV residents. CHA also has a resident service coordinator program in all of its senior-designated properties. 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 2021 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 FY2021 Outcomes:

- 40 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 FY2021 Outcomes:

- o 1,000 residents will be connected with new and better jobs.
- o At least 1,750 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 FY2021 Outcomes:

- More than 500 residents will attend the City Colleges of Chicago.
- At least 250 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 FY2021 Outcomes:

- 6,000 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 1.5%.
- 25% of seniors will receive an assessment from a resident services coordinator.

#### CHA Reserves

CHA does not have any excess reserves above HUD recommendations and no reserve fund use is budgeted for FY2021.

#### 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 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. Has the PHA provided a LAMP in the appendix? Yes

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:

- 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.

CHA makes every effort to ensure that program costs are reasonable and consistently applied in accordance 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.

## <u>Section VC: Rental Assistance Demonstration (RAD) Participation</u> 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





### 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

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

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

## Certification of Payments to Influence Federal Transactions

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

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.  I hereby certify that all the information stated herein, as well as any inf Warning: HUD will prosecute false claims and statements. Conviction 1012; 31 U.S.C. 3729, 3802)	(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.
Name of Authorized Official	Title
Tracey Scott	Chief Executive Officer
Signature	Date (mm/dd/yyyy)

Previous edition is obsolete

#### **Board Resolution**



#### September 15, 2020

Item No. 1

#### **Proposed FY2021 MTW Annual Plan**

Presenter: Jennifer Hoyle, Director, Strategic Management and Partnerships

#### Recommendation

The Chief Executive Officer recommends that the Board of Commissioners of the Chicago Housing Authority approve the FY2021 Moving to Work (MTW) Annual Plan and authorize CHA to submit the FY2021 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 August 14 – September 14, 2020. CHA held three public comment hearings via Livestream during the public comment period: August 20<sup>th</sup>, August 24<sup>th</sup> and August 28<sup>th</sup>. Announcements for the public comment process appeared on CHA's website and in Sun Times (August 14<sup>th</sup>-20<sup>th</sup>), Reader and Fin De Semana (August 21<sup>st</sup> and 22<sup>nd</sup>). 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 written comments regarding the proposed FY2021 MTW Annual Plan. Prior to finalizing the proposed FY2021 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:

Tracey Scott, Chief Executive Officer

#### **RESOLUTION NO. 2020-CHA-52**

WHEREAS,

The Board of Commissioners has reviewed the Board Letter dated September 15, 2020 requesting approval of the Proposed FY2021 MTW Annual Plan and authorization to submit the Proposed FY2021 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 FY2021 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 FY2021 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 FY2021 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.



Angela Hurlock Chairperson

**Chicago Housing Authority** 

#### Certification of Compliance

#### CERTIFICATIONS OF COMPLIANCE

### U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING

Certifications of Compliance with Regulations:
Board Resolution to Accompany the Annual Moving to Work Plan

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 1/1/2021, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- (1) The 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.
- (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	IL002
MTW PHA NAME	MTW PHA NUMBER/HA CODE
herewith, is true and accurate. Warning: HUD will pros criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 10	
Angela Hurlock	Chairperson, Board of Commissioners
NAME OF AUTHORIZED OFFICIAL	TITLE
Inla Aloch	10/16/20
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 FY2021 MTW Annual Plan for CHA Board approval, a 30-day public comment period was conducted from August 14<sup>th</sup>—September 14<sup>th</sup>. CHA held three public hearings via livestream during the comment period: (1) Thursday, August 20<sup>th</sup> at 1:00 p.m.; (2) Monday, August 24<sup>th</sup> at 10:00 a.m.; and (3) Friday, August 28<sup>th</sup> at 10:00 a.m. A total of nineteen people participated in the livesteam hearings. The comments received during the comment period and CHA's responses are listed in the table below.

liste	d in the table	Proposed FY2021 MTW Annual Plan Pu	ıblic Comment Grid
Comment	Individual/ Organization	Comment	CHA Response
1	Ziyadah B.	I am a CHA resident and I wanted to comment on the opportunity areas that are located on the Southside of Chicago. There have been several places that I have looked at that are in the Bronzeville area but, they are not considered opportunity areas. The opportunity areas don't begin until east of Cottage Grove, when ultimately there areas that are west of Cottage Grove that are definitely opportunity areas. My opinion is that the opportunity areas should be expanded.	Thank you for your comment. CHA uses Mobility Areas to determine eligibility for Exception Payment Standards and Landlord Incentive Payments for tenant-based vouchers. A Mobility Area is defined as a Chicago community area with 20% or fewer of its families with income below the poverty level and a below median reported violent crime count. Community areas with improving poverty and violent crime rates along with significant job clusters are also designated as Mobility Areas. CHA updates this map with new data periodically. In addition, CHA uses Opportunity Areas when reviewing applications for Project Based Vouchers. An Opportunity Area is defined as a census tract with less than 20% poverty and less than 5% subsidized housing saturation or improving areas with moderate neighborhood indicators.
2	Carla J	Cha staff do not return calls Camille Yangtze is one, been calling for months and still have not received a call yet.	CHA staff contacted this resident directly to address her comment.
3	petriaking	I think it's a great idea also are we able to move during the Pandemic	Thank you for your comment.
4	Aniya D	Hi i was wondering how do i go about moving. I want to move to a different location	CHA staff contacted this resident directly to address her comment. Although residents can't request a move until a year is up, they can apply for the PBV and Public Housing site-based waitlists.
5	Belinda C	I just have questions about the homeownership, are you guys still allowing people to buy into home?	Thank you for your comment. CHA still manages the Choose to Own (CTO) Homeownership Program.  Please email CTOprogram@thecha.org for more information on this program.
6	Belinda C	How do I go about the rent to own program?	Thank you for your comment. Please email CTOprogram@thecha.org
7	Felicia G	Good afternoon. I am asking the CHA to rush my moving papers asap. I have a lot of killings on my block. Please can I move. I don't want to be the next victim on the news. Thank you.	CHA staff contacted this resident directly to address her comment.

8	Porscha C	How can I receive my moving papers?	CHA staff contacted this resident directly to address her comment.
9	Nora T	I plan to attend one of the planned public comment hearings soon. For I am interested in the new plans. I submitted a hearing date around November 22, 2019 because my rent went from \$xxx.00 to a heaping \$xxx.00 during a recertification and I have not heard from anyone. The adjustment has been very hard to pay this large amount of rent. If possible, can I have a representative to review my account and contact me at the number listed below.	CHA staff contacted this resident directly to address her comment.
10	R A Freeman	Hi I just went through the proposed FY2021 Annual Plan, and I wanted to know when you expand the CTO program will you include Townhouses and Condos under choose to own? I would really like to see that happen, and also some Mobile and Manufactured homes. I think this would be a good transition for many individuals because this is becoming a very popular trend. Many of the Mobile and Manufactured home have been improved and are more modernized for the 21st century.	The Choose to Own (CTO) Homeownership Program has no planned changes proposed in the 2021 Moving to Work Annual Plan. Currently, the CTO program 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 payment for homes of all types identified within the comment. The home types that can be purchased include single family, cooperatives, townhouses, condominiums, mobile homes and manufactured homes.
11	R A Freeman	I also wanted to know if there is any new information on CTO going into 2021. I am interested in the CTO program and would like more information about it.	The Choose to Own (CTO) Homeownership Program has no planned changes proposed in the 2021 Moving to Work Annual Plan. All program information is available on the Chicago Housing Authority's website at the following link: https://www.thecha.org/residents/services/chooseto-own-homeownership-program
12	R A Freeman	Can you further explain what you mean by CHA is proposing the following modifications to FSS program, to allow household members other than the head of household to enroll in the CTO program, under Modified Family Self-Sufficiency (FSS) Program for HCV and Public Housing (2014-01)?	The Family Self Sufficiency (FSS) Program has no planned changes proposed in the 2021 Moving to Work Annual Plan. In 2019, the FSS program received approval to allow adult non-heads of household to enroll in the program. By expanding program participation beyond head of household, FSS allows for the family more broadly to work towards the goal of self-sufficiency. CHA recognizes that adult household members are working towards asset building goals and can benefit from resources that can help them obtain goals and become self-sufficient.

13	R A Freeman	How does the \$400 flat medical deduction to all elderly/disabled households benefit us, was not sure I fully understood that clause on page 5, second paragraph?	This proposed activity would provide all elderly/disabled households an automatic \$400 medical deduction without the requirement of providing any documentation. Currently elderly/disabled households are eligible to receive medical deductions for any medical expenses they have. However, they are required to submit the necessary documentation. In addition, if an elderly/disabled household has medical expenses in excess of \$400 per year, they can still receive a deduction amount more than \$400 as long as they submit the appropriate documentation.
14	R A Freeman	Please explain what is meant by, "CHA has committed 200 vouchers to help disabled households access housing and 450 vouchers for supportive housing for the ending veteran homelessness initiative?	CHA provides set aside vouchers for various special programs/initiatives. This includes 200 vouchers specifically for disabled households and 450 for supportive housing for Ending Veteran Homeless Initiative.
15	Anonymous	I would like to comment on three things one will there ever be a way if you are afraid to live where you stay to pick and area you are comfortable with and willing to let the tenant wait until available.	Family Public Housing Resident Transfers: Transfers requested heads of household living in a family property (traditional, mixed-income, scattered site) who have been in their current units for at least one year.  a. The CHA will allow a resident living in a family property to select a family public housing site-based waitlist which he/she can request to transfer.  b. The CHA will process Family Public Housing Resident Transfers on an ongoing basis in conjunction with new admissions from the waitlist.  c. Resident lease compliance will be reviewed before the Family Public Housing Resident Transfer will take place. Failure to maintain lease compliance will result in the Family Public Housing Resident Transfers request being denied.
16	Anonymous	Also when is CHA going to upgrade they security team and cameras in CHA areas due to the violence that has been going on in Altgeld Gardens Tenants are afraid and living In fear with the shootings and gang related violence Also when will Altgeld gardens and other CHA properties that are wanting a grocery store and other stored be brought to their area It is sad that many people have spoken up about how CHA decided to build a library and CRUELLY Left the residents without a store. Here is a Letter written from a CHA Resident of ALTGELD who has lived here for years she asked me to say this for her because she and others live in fear.	CHA's Safety & Security team continues to work to address violence at Altgeld. Working with the Chicago Police Department's (CPD) 005th district, CHA has seen a reduction in violence on the property. The cameras on the property are fully functioning, and both CPD and security utilize the cameras to assist in keeping residents safe.  CHA agrees that a grocery store would be beneficial at the site and will continue to work with the City of Chicago to identify opportunities to bring a grocery store to this community.

17	Anonymous	There are a lot of residents of CHA who complained about a many of things one people have a good amount of yes i believe so that when they report anything it is given out to others and then into the public which they believe is unprofessional of staff. A lot of	Property Management staff are expected to treat all resident matters with the highest level of confidentiality. At no point should a resident's case be discussed with other parties without prior consent from the resident.
		people have complained about again no grocery stores and the current concern of violence once CHA workers go home and gang activity yet no police cars but one or two. No better cameras to show the people doing bad in the community to the point neighbors new neighbors and seniors are afraid to SPEAK UP. I'm speaking up I am tired of living in Fear. I	CHA's Safety & Security team continues to work to address violence at Altgeld. Working with the Chicago Police Department's (CPD) 005th district, CHA has seen a reduction in violence on the property. The cameras on the property are fully functioning, and both CPD and security utilize the cameras to assist in keeping residents safe.
		am tired of believing those who are supposed to support us and help us are not, and I am here to say CHA it is time for us all to WAKE UP. Not telling people business nor as I heard someone spoke to tell and it got out in the Gardens. I DO not live by the Office so you can see if it get to as far as block 13 it is bad.	CHA agrees that a grocery store would be beneficial at the site and continues to work with the City of Chicago to identify opportunities to bring a grocery store to this community.
18	Anonymous	A Change needs to happen. I think it is quite sad we are engaging in paying rent and we have NO STORE NO SAFETY and live In fear yet most of us pay because we need to have a place to lay our heads but do we have to every day and weekend lay in Fear. These are the things I hope is brought up in this meeting and Upcoming meetings because WE NEED A CHANGE scared residents of CHA I speak for us all I am sure I left things out but this is what was on my mind.	CHA's Safety & Security team continues to work to address the violence at Altgeld. Working with the Chicago Police Department's (CPD) 005th district, CHA has seen a reduction in violence on the property. The cameras on the property are fully functioning, and both CPD and security utilize the cameras to assist in keeping residents safe.
19	Ms Barnes	How do I apply for housing?	Please go to https://applyonline.thecha.org to review housing opportunities and submit an application. CHA's Housing Choice Voucher waitlist is closed, but CHA's Public Housing and Project-Based Voucher waitlists are currently open.
20	Lisa T	I received an email from Zachariah to attend meeting by phone on Friday August 21. When the lady called everyone's name mine wasn't called. I kept talking but somehow no one heard me. I haven't received an email about my moving papers yet. Can someone please call me back?	CHA staff contacted this resident directly to address her comment.
21	Catherine A	How do I apply for housing?	Please go to https://applyonline.thecha.org to review housing opportunities and submit an application. CHA's Housing Choice Voucher waitlist is closed, but CHA's Public Housing and Project-Based Voucher waitlists are currently open.

22	Ms. Robinson	Ms. Robinson has been on the one-bedroom waitlist for quite some time and has been promised a one-bedroom unit from each management team. Zelda Ormes has had several management teams, and her fear is that she'll have to start the process all over again and get lost in the shuffle. This has happened three or four times.	CHA staff contacted this resident directly to address her comment.
23	Hollis B	WHERE ARE YOU NOW? As of August 27th, 2020, most of the housing project apartments have existed for over 35-40 years. The interiors are made of hard concrete and the aesthetics, both interiorly and exteriorly, are reminiscent of a prison complex. The outdoor space isn't used because spaces are not user friendly.	The CHA is evaluating the physical conditions of its senior buildings and evaluating how to comprehensively address critical repairs to preserve buildings long-term. The standard procedure under the Rental Assistance Demonstration (RAD) program is to establish an architectural and design plan that seeks improve buildings' exteriors (to keep buildings dry and free from water and air infiltration) and mechanical, electrical and plumbing systems (MEP systems) as priority measures to preserve buildings for a minimum of 20 years. To the extent architectural designs include interior renovations impact resident living and common area spaces, allowances for resident engagement and input will be made.
24	Hollis B	These spaces are outdated the initial builder's intentions appear to devalue its residents. The money-saving materials that have been used are of poor quality. Constant poison used to exterminate do not address the fact that when people are compacted together infestation problems will continue to arise. Those poisons are harmful to your health extended use. The apartments storage, and useable interior space are cramped and there is no space for kitchen prep. Bath tubes and balconies are not available to able bodied residents.	All of the EPA approved products that Platinum uses were selected based on their combination of safety and efficacy. They can use the same products, or combination of products, to safely service apartments, hallways, garbage chutes, garbage rooms or any other area within a building. The proximity of these areas will not cause any excessive exposure to these products. All of the products that Platinum uses have been approved by the Environmental Protection Agency.
25	Hollis B	Because the floors are concrete, they place additional pressure on the bones and spine. There is always a shortage of maintenance, laundry facilities, and in an emergency, there will be multiple casualties after attempting to exit these buildings that are over 5 stories high.	Residents requesting a Reasonable Accommodation must complete a Reasonable Accommodation request identifying specific needs and submit it to the property management company.
26	Hollis B	Extra expenses are needed to have access to urgent care, day care, fresh produce and creative activities.  Seniors are parents, grandparents, aunts, uncles, cousins, friends, as well as, retired professionals and participants involved with community politics. There has been no way to link and provide forums, or library access to them. Their family members have no way to sit with them in the time of crisis nor entertainment in their units because the inside is too small. The ventilation, heating and air conditioning are not maintained efficiently throughout the buildings.	Thank you for your comment regarding access to resources for CHA residents and participants. Please contact your contracted service provider, FamilyWorks at family properties and Catholic Charities at senior-designated properties, to access existing Resident Services offerings.  Unit concerns are reviewed and addressed via CHA's Property Office. Your comment regarding unit and building ventilation will be forwarded to CHA's Property Office.

27	Hollis B	WHERE YOU WANT TO GO: Many states have replaced these eye sore dinosaur buildings and reconstructed them. We realized that CHA has also completed some areas of reconstruction. However, the poor neighborhoods and senior buildings are not having their needs met. (The Los Angeles" Star project) is a good example of valuing the city as well as all of its residents with low income housing reconstruction. Accessible entrances and less height are compatible designs for many with disabilities.	Thank you for sharing these examples. As CHA continues to re-evaluate our buildings, we welcome new ideas regarding how to design better with the needs of all of our residents in mind.
28	Hollis B	Having on-site ambulatory care, exercise, entertainment and gardens will provide education and assist with the health of all residents like at (The Waterway Park). Bridging the gap between the poor and the more affluent citizens is good practice. While adding supportive services like mental health, easy reporting of tenant abuse, health and nutrition education.	Thank you for your comment. CHA residents are able to access a range of services via their Resident Service Coordinator who provides services on-site, offering health education and training, social opportunities and coordinates other specialized care.
29	Hollis B	HOW WILL YOU DO IT? Make the decision to do the "right thing," Where and how would you want to live, or your mother and father, or your children. Get the vision, ask questions from educated and even people you know who have values, professional retirees. Ask the people who must live there to give their opinion on a design. Start reaching out to businesses and service industries to link on-site services. Shipping services, a gym, clinics library, entertainment. Start designing the plan	CHA is evaluating the physical conditions of its senior buildings and evaluating how to comprehensively address critical repairs to preserve buildings long-term. The standard procedure under the Rental Assistance Demonstration (RAD) program is to establish an architectural and design plan that seeks improve buildings' exteriors (to keep buildings dry and free from water and air infiltration) and mechanical, electrical and plumbing systems (MEP systems) as priority measures to preserve buildings for a minimum of 20 years. To the extent architectural designs include interior renovations impact resident living and common area spaces, allowances for resident engagement and input will be made.
30	Hollis B	According to your CHA DELIVERY STRATEGY UNDER (OTHER INITIATIVES) However, until YOU COMPLETE THAT PLAN, would you please solve the problems that exist. Make a lot of much needed repairs in the existing buildings and protect the tenants from predatory activities. Start hiring enough people who can meet the needs of the diverse populations of CHA tenants. Increase services that will make these buildings decent so we all will thrive.	CHA is evaluating the physical conditions of its senior buildings and evaluating how to comprehensively address critical repairs to preserve buildings long-term. This includes emerging but also long-standing issues within buildings. Resident Services will continue to connect residents with services and programs that will seek to improve the quality of life of CHA residents.
31	Donna J	Ms. Jones is a voucher holder and requires assistance with looking for a place to live, and possibly moving.	CHA contacted this resident directly to address her comment.
32	Ms. Muhammad	Ms. Muhammad has been a resident at Hilliard for 14 years. She said she has requested several times to have her apartment painted. Additionally, there is water damage from the roof, and when it rains, she has leakage.	CHA staff contacted this resident directly to address her comment.

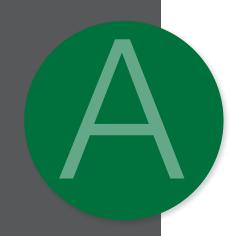
33	Tameka L.	I was hoping that someone would provide clarification on the plans under, Changes to Housing Stock, Capital Construction and Development Updates, particularly the language that CHA has proposed the disposition of parcels.	Housing stock must be removed from CHA inventory as part of a plan to demolish and replace with new buildings, as is planned for Lathrop. The scattered site housing listed in the plan have been identified for possible disposition. Other buildings and land may be "disposed" of as part of a plan for a redevelopment, including housing for CHA residents, or as a sale.
34	Sclena K.	Ms. Kidd said that she needs repair work in her unit, and since COVID-19, the engineers are not doing their jobs. She said when she goes to the office the door is always closed, the phone is not answered, and the voicemail never kicks in.	CHA staff contacted this resident directly to address her comment. Due to the COVID-19 pandemic, maintenance was only handling Emergency Work Orders for several months and they recently resumed working on routine work orders.
35	Jaclyn Zarack Koriath Legal Aid Chicago	I: Including the Lathrop Homes units in "Dwelling Demolition" (page 9)  CHA has included in its plan the demolition of 183 public housing units at Lathrop Homes. Lathrop should not be demolished for many reasons. Preserving the public housing at Lathrop Homes meets the MTW's Statutory Objectives of "increasing housing choices for low-income families" and "reducing costs and achieving greater cost effectiveness in federal expenditures." It is also consistent with CHA's statutory obligation to affirmatively further fair housing. Although CHA provides that it is "working to create off-site units in accordance with the Lathrop Homes Agreed Court Order," it does not explain the details of how it plans to create these units while demolishing a significant number of units on the Lathrop site.	The plan for the redevelopment of Lathrop Homes calls for new, accessible buildings on the site where the units will be demolished. Housing stock must be removed from CHA inventory as part of a plan to demolish and replace with new buildings, as is planned for Lathrop. Like the building constructed as part of Phase 1A, new buildings will provide a variety of unit types for residents. Other buildings on the site will be rehabilitated.
36	Jaclyn Zarack Koriath Legal Aid Chicago	The Near North Side is a high-income, racially diverse neighborhood without the high concentration of public housing that exists in other Chicago neighborhoods. Lathrop Homes is in a racially and economically diverse area with access to transportation, grocery stores, and job opportunities. The area around Lathrop is also without high concentrations of public housing, currently and historically.	Thank you for your comment

37	Jaclyn Zarack Koriath Legal Aid Chicago	Although the Plan makes several references to the Project-Based Voucher (PBV) program, it is not the solution to the problem of lost units in areas of opportunity. CHA's planned PBV units are largely located in non-opportunity areas on the West and South side, in racially-segregated areas. Similarly, the CHA's Housing Choice Voucher (HCV) Program will do little to keep families in racially and economically diverse areas of opportunity like the neighborhoods where the units at Lathrop are located. According to CHA's own reports, voucher-holders are moving not to the North Side but to segregated areas of concentrated poverty on the South and West Sides. Accordingly, CHA should remove this proposal at this time, especially in light of the fact that CHA may file an Amended MTW Plan if plans for the public housing units at Lathrop are finalized in 2021.	CHA works to create and preserve housing opportunities across the City of Chicago and utilizes a variety of tools to create housing stability for Chicago's low-income community. Further, CHA has implemented MTW activities with the specific goal of increasing housing opportunities for HCV and PBV residents, including Exception Payment Standards and the Landlord Incentive Program.
39	Jaclyn Zarack Koriath Legal Aid Chicago	II. Counting Project Based Vouchers toward unit delivery under the Plan (pages 3-4, 33)  As we have stated in previous comments, PBV units should only count toward the 25,000 units only if they will be available to families with a Right of Return (i.e. 10/1/99 families), rather than only to people on the project-based voucher waiting list and other special populations, such as formerly homeless people or people who need additional supportive services.	Thank you for your comment.
40	Jaclyn Zarack Koriath Legal Aid Chicago	Additionally, we are troubled by CHA's proposal to count Mod Rehab conversion to PBV toward the 25,000 unit delivery. Mod Rehab units existed at the time the Plan for Transformation was approved and implemented and were not included in its purview. While we are glad that CHA is preserving Mod Rehab units through conversion to PBV, it really results in a net loss of low-income housing stock in Chicago if those units are counted toward the 25,000. Additionally, these units will likely draw from a PBV or special populations waitlist and not be fully accessible to 10/1/99 families. Finally, many if not most or all Mod Rehab units are studio or one-bedroom units. Families with a Right of Return and families from CHA's waitlists need larger bedroom sizes.	Thank you for your comment.
41	Jaclyn Zarack Koriath Legal Aid Chicago	With such a great need for affordable housing in this City, CHA should be expanding housing opportunities beyond the 25,000 replacement units and PBVs that are unavailable to families with a Right of Return therefore should not be included in the 25,000 replacement unit count.	Thank you for your comment.

43	Jaclyn Zarack Koriath Legal Aid Chicago Jaclyn Zarack Koriath Legal Aid Chicago	III.: Using Voucher Size to Determine Payment Standard (2021-1) (page 30)  We support this proposal, especially because it may encourage families to move in to well-maintained assisted units in opportunity areas, where housing is more expensive.  IV.: Conducting HQS Inspections for a Sample of Units in Buildings with Substantial Numbers of HCV Voucher Holders (page 31)	Thank you for your comment.  Thank you for your comment.
		We support this proposal, especially if it will make more inspectors available to conduct complaint inspections on an expedited basis.	
44	Jaclyn Zarack Koriath Legal Aid Chicago	V.: Providing a Flat Medical Deduction for all Elderly/Disabled Households (page 32)  The federal regulations governing the public housing program provide that PHAs must deduct from each household's annual income (1) the unreimbursed medical expenses of any elderly family or disabled family; and (2) unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed. 24 C.F.R. § 5.611(a)(3)(i) and (ii). CHA's proposal to provide a flat medical deduction of \$400 to all elderly/disabled households has a surface appeal, as it relieves tenants of the burden of documenting the unreimbursed expenses, and it relieves CHA of the burden of calculating the amount of the deduction. The problem, of course, is that some households are currently entitled to a deduction that exceeds \$400 (perhaps significantly). CHA's proposal deprives such households of income by not giving them the full deduction to which they are entitled. We suggest, therefore, that CHA modify its proposal by stating that every elderly/disabled household will receive a medical deduction of at least \$400, but that the deduction will exceed that amount if the household provides documentation establishing that it is entitled to a higher deduction.	Currently, elderly/disabled households are eligible to receive medical deductions for any medical expenses they have, but they are required to submit the necessary documentation. The proposed activity would provide all elderly/disabled households an automatic \$400 medical deduction without the requirement of providing any documentation.  As the proposed activity specifies, elderly/disabled households with medical expenses in excess of \$400 per year would still be eligible to receive a deduction if they submit the required documentation.

45	Rhonda L.	Good evening: After reading the 85 - page, CHA Annual Plan, I must say that I am very pleased. My overall objective for being a HCV-Section 8 program participant is to acquire the knowledge and information that I need to become more self-sufficient. I need to be able to show my 2 daughters (ages 14 and 16 years old) the process I am going through to ensure a positive outcome. Once I completed the reading of this Annual Plan, I have learned a lot. I have learned all of what is involved in the rehabilitation, redevelopment, and the acquisition of various properties.	Thank you for your comment. We are pleased that you are taking advantage of the numerous programs offered by CHA.  HCV Program participants are also able to takes classes and earn an Associate Degree at any City Colleges of Chicago free of charge after applying for financial aid.
46	Rhonda L.	I am very interested in attending and participating in workshops and seminars in order to further learn the importance of all I 'Signed-up-For', as being a HCV recipient. I appreciate and am very grateful to have housing provided to me through your program. I agree with the 8-year time period of having this opportunity as well. I believe that 8 years is a sufficient period of time to get adjusted, maintain and budget my bills, and set goals for future endeavors. Presently, I am getting acclimated to this program, whereby I have not yet decided if I desire to be a homeowner! The 1st-Time Home Ownership Program is very interesting to me. However, that is on the backburner for now; as I continue to get adjusted to my present voucher recipient.	Thank you for your comment. We are pleased that you are taking advantage of the numerous programs offered by CHA. Please email CTOprogram@thecha.org for more information on the Choose to Own Homeownership Program.
47	Rhonda L.	The objectives that have been stated within this annual plan, are very realistic. I can appreciate the 'Cost Formula' piece, which helps me understand all that is involved for your organization to provide these opportunities. Not only have you provided affordable housing for the average tenant; you have also made provisions for the elderly and the disabled participants as well. With today's cost of living expenses, I'm sure I am not alone in appreciating this program. Even when I am financially equipped to venture out into your home ownership program, I'm sure I will have everything I need to realistically take that step! A major goal that I have is to be productive in this program, thereby producing positive results!	Thank you for your comment. We are pleased that you are taking advantage of the numerous programs offered by CHA.
48	Rhonda L.	To comment on your 'Wait-list revisions, I can appreciate that as well. With the homeless population being so high, this program will allow many others to have the opportunity for housing as well. It was mentioned that the revised minimum rent payment would be \$75.00 is also reasonable as well (except for special circumstances such as unemployment, etc.)	Thank you for your comment.

49	Rhonda L.	I feel that it is not necessary for me to quote every detail of this Annual Plan, except for to ensure to you that I read the entire 85 pages. However, I assure you that I did so pardon me if I omitted any important details.	Thank you for your comment.
		In closing, I'd like to reiterate my appreciation and gratitude for allowing me to know what's going on with the CHA organization, and to express my sincere thankfulness in being a HCV participant.	
		I look forward to learning even more, and being more involved in the various educational workshops, seminars, etc. to further my knowledge, as well as to benefit and become eligible for future self-sustaining housing-related programs and endeavors.	



# **APPENDICES**



#### **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 1,536 UFAS-504 Mobility units and 437 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 an accessibility specialist who works in the public housing Property Office. The Accessibility Specialist oversees 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.

The Capitol Construction Department (CCD) 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 ensure 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. The Fair Housing Department has four staff to serve HCV participants who need fair housing and disability-related assistance. The Housing Locator position assists disabled housing choice voucher participants locate accessible housing that meets their disability related needs. The Housing Locator has built a database of accessible units and conducts 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 2020, the Fair Housing Department delivered over 600 decisions for reasonable accommodation requests submitted by HCV applicants and participants.

The Fair Housing Department organizes and facilitates trainings on fair housing and disability. In 2020, the Fair Housing Department developed an interactive video on reasonable accommodations for all CHA staff. The department also provided a training for HCV landlords on the modification fund and the pilot program developed to provide landlords with accessibility guidance in partnership with an architecture firm that specializes in accessibility design. Fair Housing also provides trainings for outside organizations such as non-profit community groups and real estate associations. Fair Housing moderated a panel at CHA's 2020 annual HCV Owners Symposium discussing fair housing and tenant screening. The CHA plans to offer virtual Fair Housing and Disabilities trainings throughout 2020.

CHA's reasonable accommodation procedure will be updated to process and track reasonable accommodations through an on-line portal in the 4th quarter of 2020. 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 completed its first year of fair housing testing in 2020. 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.

96				Unit Mix		Transfer of	
NAME AND STATUS	PIC AMP	RAD	Total Units	(Pre-Conversion / Post-Conversion)	Property Type	Assistance Proposed	Capital Fund Allocation
NAIVIE AIND STATUS	PIC AIVIP	Туре	Ullics	Post-Conversion)	туре	Proposeu	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	0BR - 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	0BR - 82 1BR - 186 2BR - 1	Traditional Senior	No	\$8,408,400
Kenneth Campbell – converted 2018	IL002082000	PBV	165	0BR - 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	0BR - 303 1BR - 145 2BR - 2	Traditional Senior	No	\$1,200,000
Minnie Riperton – converted 2016	IL002078000	PBV	339	0BR - 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	0BR - 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	0BR - 32 1BR - 118 2BR - 1	Traditional Senior	No	TBD
Alfreda Barnett Duster	IL002042000	PBV	129	0BR - 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	0BR - 46 1BR - 346 2BR - 2	Traditional Senior	No	TBD
Flannery	IL002044000	PBV	252	0BR - 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	0BR - 87 1BR - 177 2BR - 2	Traditional Senior	No	TBD
Vivian Gordon Harsh (incl. Judge Green) – converted 2019	IL002083000	PBV	278	0BR - 21 1BR - 255 2BR - 2	Traditional Senior	No	\$7,577,300 and \$13,127,700
Judge Fisher – converted 2017	IL002057000	PBV	199	0BR - 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	0BR - 240 1BR - 240 2BR - 2	Traditional Senior	No	\$10,980,000
Armour Square	IL002046000	PBV	392	0BR - 43 1BR - 345 2BR - 4	Traditional Senior	No	TBD
Lincoln Perry – converted 2016	IL002052100	PBV	450	0BR - 8 1BR 440 2BR - 2	Traditional Senior	No	\$7,650,000
Judge Slater – converted 2016	IL002084000	PBV	407	0BR - 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	0BR - 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 reexamination 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
Public Housing/Housing Choice Voucher

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  ${\bf f}$ .

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.)
	See attached list.

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	Title					
Patricia Rios	Chief Administrative Officer					
Signature D. A.D.	Date					
x fat \$1. Kios	10/13/20					

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



#### **CHA Sites for Work Performance:**

 Chicago Housing Authority Central Office 60 E. Van Buren Street Chicago, IL 60605

#### 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. 35<sup>th</sup> Street Chicago, IL 60616

# LORI LIGHTFOOT MAYOR, CITY OF CHICAGO

TRACEY SCOTT
CEO, CHICAGO HOUSING AUTHORITY

ANGELA HURLOCK
CHAIRPERSON

CRAIG CHICO
VICE-CHAIRMAN

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