Streamlined Annual PHA Plan *(High Performer PHAs)*	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016

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

Applicability. Form HUD-50075-HP is to be completed annually by High Performing PHAs. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

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

A. PHA Information.

A.1

PHA Name: Grand Rapids Housing Commission (GRHC), PHA Code: mi073
PHA Type: ☐ Small ☒ High Performer
PHA Plan for Fiscal Year Beginning: July 1, 2022
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
Number of Public Housing (PH) Units: 203 **Number of Housing Choice Vouchers (HCVs): 3,723**
Total Combined: 3,926
PHA Plan Submission Type: ☒ High Performer ☐ Revised Annual Submission

Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

Locations where the public may view and/or obtain copies of the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan:
1. GRHC Administrative Office, 1420 Fuller Ave. SE, Grand Rapids, MI
2. GRHC web site: www.grhousing.org
3. GRHC asset management project offices:
   Adams Park Apartments, 1440 Fuller Ave. SE, Grand Rapids, MI
   Antoine Court Apartments, 901 South Division Ave., Grand Rapids, MI
   Campau Commons Apartments, 821 South Division Ave., Grand Rapids, MI
   Creston Plaza Apartments, 1080 Creston Plaza Dr. NE, Grand Rapids, MI
   Hope Community, 1024 Ionia SW, Grand Rapids, MI
   Leonard Terrace Apartments, 1315 Leonard St. NE, Grand Rapids, MI
   Mount Mercy Apartments, 1425 Bridge St. NW, Grand Rapids, MI
   Ransom Tower Apartments, 50 Ransom Ave. NE, Grand Rapids, MI
   Sheldon Apartments, 1010 Sheldon SE, Grand Rapids, MI

☐ **PHA Consortia:** (Check box if submitting a Joint PHA Plan and complete the table below)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B. Annual Plan Elements

B.1

Revision of PHA Plan elements.

(a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission:

B.1 (cont.)

Y	N	
☐	☒	Statement of Housing Needs and Strategy for Addressing Housing Needs.
☒	☐	Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions.
☒	☐	Financial Resources.
☒	☐	Rent Determination.
☐	☒	Homeownership Programs.
☒	☐	Safety and Crime Prevention.
☐	☒	Pet Policy.
☐	☒	Substantial Deviation.
☐	☒	Significant Amendment/Modification

(b) The PHA must submit its Deconcentration Policy for Field Office Review.

The GRHC's Deconcentration Policy is provided as Attachment A.

Revisions to Policies that Govern Eligibility, Selection and Admissions

The GRHC is in the process of revising the Admissions and Continued Occupancy Policies for each of our housing sites. Upon completion the policies will be approved by the Board and submitted to HUD for review as applicable. Anticipated completion date is early fall 2022.

On March 16, 2021, the Housing Commission approved a resolution to update the Agency's HCV Administrative Plan, Chapter 5, Part II: Subsidy Standards and Voucher Issuance, 5-II-B. Determining Family Unit (Voucher) Size, to allow Head of Household families (single and married) to have a separate bedroom from a child five years of age or younger. The relevant excerpt from Chapter 5 is included as Attachment B.

During May 2021 the GRHC received notice that the agency was awarded 42 Emergency Housing Vouchers authorized under the American Rescue Plan Act. On 6/16/2021, the Housing Commission approved a resolution to add a Temporary Policy Supplement for Emergency Housing Vouchers to the agency's Housing Choice Voucher (HCV) Administrative Plan; the supplement is included as Attachment C.

During August 2021 the GRHC updated its Housing Choice Voucher Program Administrative Plan, Chapter 17, Project-Based Vouchers, in support of agency efforts to promote expanded availability of affordable housing by providing Project-Based Vouchers to qualified housing developers. Relevant chapter excerpts and description of changes:

Chapter 17, Project-Based Vouchers, Part 1 General Requirements, 17-I.A. OVERVIEW [24 CFR 983.5; FR Notice 1/18/17; Notice PIH 2017-21], Additional Project-Based Units [FR Notice 1/18/17; Notice PIH 2017-21]:
The PHA may project-base an additional 10 percent of its units above the 20 percent program limit. The units may be distributed among one, all, or a combination of the categories as long as the total number of units does not exceed the 10 percent cap. Units qualify under this exception if the units:

- Are specifically made available to house individuals and families that meet the definition of homeless under section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302) and contained in the Continuum of Care Interim Rule at 24 CFR 578.3.
- Are specifically made available to house families that are comprised of or include a veteran.
  - Veteran means an individual who has served in the United States Armed Forces.
- Provide supportive housing to persons with disabilities or elderly persons as defined in 24 CFR 5.403.
- Are located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year Estimates.

Only units that that are under a HAP contract that was first executed on or after April 18, 2017, are covered by the 10 percent exception.

Revise from:
GRHC Policy: GRHC will not set aside units above the 20 percent program limit.
Revise to:
GRHC Policy: The GRHC may project-base up to an additional 10 percent of its authorized units, up to 30 percent, in accordance with HUD regulations and requirements.

Chapter 17, Project-Based Vouchers, Part 1 General Requirements, 17-I.A. OVERVIEW [24 CFR 983.5; FR Notice 1/18/17; Notice PIH 2017-21], Units Not Subject to the PBV Program Limitation [FR Notice 1/18/17]:
PBV units under the RAD program and HUD-VASH PBV set-aside vouchers do not count toward the 20 percent limitation when PBV assistance is attached to them.

In addition, units that were previously subject to certain federal rent restrictions or were receiving another type of long-term housing subsidy provided by HUD are not subject to the cap. The unit must be covered under a PBV HAP contract that first became effective on or after April 18, 2017.

Revise from:
GRHC Policy: GRHC will not project-base any units not subject to the 20 percent cap.
Revise to:
The GRHC may project-base units not subject to the 20 percent cap in accordance with HUD regulations and requirements.

During 2021 50 Project-Based Vouchers were awarded non-competitively to the GRHC's Antoine Court Apartments development.

On 8/17/2021, the Housing Commission approved the commitment of 36 Project-Based Vouchers to four qualified affordable housing development projects.

B.1 (cont.)

On 9/21/2021, the Housing Commission approved a revision to our agency's Housing Choice Voucher Program Administrative Plan, Chapter 15, Special Housing Types, to include manufactured homes as an affordable housing option available to assisted families as a special housing type. Chapter 15, Part VI, Manufactured Homes, is included as Attachment D.

In late 2021 the GRHC opened Antoine.Court Apartments, a 50-unit development that serves veterans, seniors and people with disabilities; the Housing Commission approved the Admissions & Continued Occupancy Policy (ACOP) for the new development on 9/21/2021. The ACOP is included as Attachment E.

Financial Resources

During 2021 the GRHC sold five properties from our Scattered Sites (MI073000004) inventory through de minimis reduction. A portion of the $658,445 in proceeds from the sale of these units was used to fund construction of Antoine Court, a 50-unit development that opened in October 2021. The remaining funds will be used for future development projects or to address the capital/rehabilitation needs of existing developments.

Current allocations of Capital Funds allotted to GRHC are outlined in the Capital Fund Program Five-Year Action Plan approved on January 28, 2022 (available in the HUD Energy and Performance Information Center (EPIC) Secure System and included here as Attachment L). The GRHC is in the process of planning and implementing an asset repositioning strategy for our Low-Income Public Housing (LIPH) units. Depending on the repositioning option selected by GRHC, future Operating Funds and Capital Funds may be impacted. For example, a RAD Section 18 Blend would still provide Operating and Capital Funds under Asset Repositioning Fees and Disposition/Demolition Transitional Funding for a limited period. If Streamlined Voluntary Conversion is the repositioning option determined most viable, Section 9 funds (Operating and Capital) would no longer be available for use by the agency.

We anticipate any reduction in Capital Fund grants will be offset by funds received through the Section 8 Project-Based program and gained through private investment in the affected developments. By providing the financial stability that will help us to attract private funding, these activities support a 2020-2024 Five-Year PHA Plan maintenance goal to "Maintain the Housing Commission real estate in good condition" as well as a specific community planning goal to "Address a community need cited in the Kent County, City of Grand Rapids and City of Wyoming Regional Consolidated Housing and Community Development Plan by making affordable housing opportunities more available to low-income and very low-income families."

For more information about the GRHC's financial resources, please reference the Revised Operating Budget for the fiscal year ending 6/30/22 included as Attachment F.

Revisions to Policies that Govern Rent Determination

The GRHC will adopt, effective May 1, 2022, payment standards that are 120 percent of the HUD-established Fair Market Rent (FMR) for Federal Fiscal Year 2022. The GRHC updated the utility allowances used in the Section 8 Housing Choice Voucher and Low-Income Public Housing programs in compliance with 24 CFR part 982.517. Current FMR and utility allowance schedules and HUD approval of the increased payment standards are included in Attachment G.

Safety and Crime Prevention

During fall 2021 the GRHC received a HUD Emergency Safety and Security Grant in the amount of $249,984; we are currently developing a plan to implement enhanced security measures at eligible developments.

B.2 **New Activities.**

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

Y	N	
☐	☒	Hope VI or Choice Neighborhoods.
☒	☐	Mixed Finance Modernization or Development.
☒	☐	Demolition and/or Disposition.
☒	☐	Conversion of Public Housing to Tenant-Based Assistance.
☒	☐	Conversion of Public Housing to Project-Based Assistance under RAD.
☒	☐	Project-Based Vouchers.
☐	☒	Units with Approved Vacancies for Modernization.
☒	☐	Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

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

Scattered Sites (MI073000004), 15 units:

The GRHC currently has 14 three-bedroom and one 4-bedroom single-family Scattered Sites units that are included in an existing home ownership program. The GRHC is considering disposition of these units through a Section 18-Scattered Sites Asset Repositioning initiative, however, we may alternatively explore home ownership program opportunities that may be developed as part of HUD's "Build Back Better" initiative in the year ahead.

The units slated for disposition are:

All homes have three bedrooms with the exception of 716 Thomas St. SE, which has four bedrooms. Unit size of the homes will remain the same after conversion.

442 Adams St. SE	650 Henry Ave. SE	1127 Kalamazoo Ave. SE	21 Shelby St. SE
831 Bates St. SE	1128 Fisk St. SE	448 Oakdale St. SE	716 Thomas St. SE
424 Griggs St. SE	2125 Francis Ave. SE	461 Oakdale St. SE	808 Woolsey Ave. SW
500 Crawford St. SE	2144 Horton Ave. SE	465 Oakdale St. SE	

The units will be offered for sale as follows:

1. Sale to the existing tenant(s) (first right of refusal) under the current homeownerhsip program.
2. Sale to residents who are participants in the GRHC's Family Self-Sufficiency program at fair market value.
3. Sale to other eligible low-income households (income at or below 80% of Area Median Income) at fair market value.

Under the potential disposition strategies noted above, the current tenant may be eligible to receive a Tenant Protection Voucher (TPV) or relocation assistance under the Uniform Relocation Assistance & Real Property Acquisition Act. A tenant or participant may consider conversion of the TPV to PBV to make it possible to meet mortgage eligibility requirements to use the PBV amount toward mortgage payments. Where relocation is necessary, GRHC will ensure assistance under the Uniform Relocation Act to help the tenant move to a comparable safe, sanitary and affordable dwelling unit.

The conversion of these Scattered Sites units support the following specific goals in our 2020-2024 Five-Year PHA Plan:

Maintenance: "Maintain the Housing Commission real estate in good condition."

Community Planning: "Address a community need cited in the Kent County, City of Grand Rapids and City of Wyoming Regional Consolidated Housing and Community Development Plan by making affordable housing opportunities more available to low-income and very low-income families."

Adams Park Apartments (MI073000001), 188 units:

A 2021 architectural inspection of Adams Park Apartments revealed that our plan to renovate the 50-year-old development using HUD grants and funds leveraged through federal Low-Income Housing Tax Credits is not feasible due to the age and condition of plumbing and electrical systems that were built beneath the structure; these would not be replaceable in the event of failure.

During the year ahead the GRHC will forge a plan for the total redevelopment of the 188-unit development; we anticipate that redevelopment financing will include HUD grants as well as LIHTC. We anticipate that the redevelopment process will take several years and will explore whether Streamlined Voluntary Conversion, a RAD/Section 18 Blend strategy or similar conversion option would be optimal for this development.

Located at 1440 Fuller Ave. SE in Grand Rapids, Adams Park serves disabled adults and seniors ages 62 or older; Adams Park will continue to serve these populations after redevelopment. Unit size and distribution will be determined during the planning process.

It is anticipated that conversion will require tenant relocation. Tenants will receive all applicable assistance available through the Uniform Relocation Act.

B.2 (cont.)	Hope Community Rapid Re-Housing Program, 24 units: The GRHC continues to seek public and private funding and in-kind donations to support the renovation of our Hope Community Rapid Re-Housing program facilities. The GRHC may elect to seek funding through the LIHTC program. Hope Community includes 24 units located at 1024 Ionia Avenue SW (12 units), 34/38 Albany St. SW (2 units), 35/37 Shelby St. SW (2 units), 43/47 Canton St. SW (2 units), 106/108 Putnam St. SW (2 units), 1043/1045 Ionia Ave. SW (2 units), and 1106/1108 Ionia Ave. SW (2 units). Hope Community serves women and their minor children who are experiencing homelessness; we will continue to serve this population after renovation. Bedroom distribution at Hope Community is (and will remain): • 12 modular units that can be configured for one to three bedrooms. • Two-bedroom duplex units (6 units). • Three-bedroom duplex units (6 units). It is anticipated that renovation will not require tenant relocation. If relocation becomes necessary, Tenants will receive all applicable assistance available through the Uniform Relocation Act. The redevelopment of Adams Park and renovation of Hope Community support the following 2020-2024 Five-Year Plan goals: Community Planning: "Address a community need cited in the Kent County, City of Grand Rapids and City of Wyoming Regional Consolidated Housing and Community Development Plan by making affordable housing opportunities more available to low-income and very low-income families." Maintenance: "Maintain the Housing Commission real estate in good condition." Emergency Safety and Security Grant: During fall 2021 the GRHC received a HUD Emergency Safety and Security Grant in the amount of $249,984; we are currently developing a plan to implement enhanced security measures at eligible developments.
B.3	**Progress Report.** Provide a description of the PHA's progress in meeting its Mission and Goals in the PHA 5-Year Plan. The Grand Rapids Housing Commission continues to make significant progress toward accomplishing its stated mission of providing housing assistance and affordable housing opportunities to lower income families, people with disabilities and senior citizens in a manner that is fiscally sound and in ways that support families, neighborhoods and economic self-sufficiency. Some of the most significant accomplishments of the past year follow; these support Five-Year Plan community planning, maintenance, equal opportunity and resident services goals. • Committed 36 Section 8 Project-Based Vouchers in support of partner agencies that are developing affordable housing. • Completed construction of Antoine Court Apartments, a 50-unit, $13.5 million development dedicated to serving the housing and supportive needs of veterans, people eligible for Permanent Supportive Housing, and seniors ages 62 and older. Antoine Court opened in November 2021 and was fully leased by 12/31/21. • Began the planning process for a total redevelopment of Adams Park Apartments and a major renovation at Hope Community Rapid Re-Housing program facilities. Adams Park serves adults with disabilities and seniors ages 62 and older. Hope Community serves families experiencing homelessness. • Continued a partnership with the Grand Valley State University Kirkhof College of Nursing that provides an on-site health clinic, including behavioral health services, at Mount Mercy Apartments; Mount Mercy is a retirement community that serves ages 55 and older. • Continued a partnership with Meals On Wheels Western Michigan to host on-site Dining Centers at four GRHC developments that serve seniors. During the time the Dining Centers have been closed due to the COVID-19 pandemic, worked with Meals On Wheels to provide individual meal delivery services to eligible residents. • Continued a partnership with the USDA "Meet Up & Eat Up" children's summer meal program administered locally through Grand Rapids Public Schools, offering grab-and-go meals at Campau Commons Apartments and Creston Plaza Apartments during summer 2021. • Administered a Family Self-Sufficiency program that served more than 300 households during 2021, including 17 program graduates who received a total of $178,095 in escrowed funds. • Offered virtual orientation meetings to encourage resident participation in the GRHC Housing Choice Voucher Homeownership Program and celebrated four home purchases during 2021. • Administered 42 Emergency Housing Vouchers in support of families experiencing homelessness, at risk of housing instability or fleeing domestic violence. • Issued 10 vouchers through the GRHC's new Foster Youth to Independence (FYI) program, which provides a rental subsidy and optional supportive services to youth who are aging out of the foster care system. • Partnered with local businesses and faith-based partners to meet resident needs for financial and food assistance during the COVID-19 pandemic.

B.4	**Most Recent Fiscal Year Audit.** (a) Were there any findings in the most recent FY Audit? Y N ☐ ☒ Fiscal Year ended 6/30/21 (b) If yes, please describe:
	Other Document and/or Certification Requirements.
C.1	**Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan** Form 50077-ST-HCV-HP, *Certification of Compliance with PHA Plans and Related Regulations*, must be submitted by the PHA as an electronic attachment to the PHA Plan. See Attachment H.
C.2	**Civil Rights Certification.** Form 50077-ST-HCV-HP, *Certification of Compliance with PHA Plans and Related Regulations*, must be submitted by the PHA as an electronic attachment to the PHA Plan. See Attachment I.
C.3	**Resident Advisory Board (RAB) Comments.** (a) Did the RAB(s) provide comments to the PHA Plan? Y N ☐ ☐ A Resident Advisory Board meeting will be scheduled prior to the March public hear; minutes will be provided as Attachment J.
C.4	**Certification by State or Local Officials.** Included as Attachment K.
D	**Statement of Capital Improvements.** Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).
D.1	**Capital Improvements.** Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD. Anticipated capital expenditures for fiscal year 2022 are included in the Capital Fund Program Five-Year Action Plan approved on January 28, 2022 (available in the HUD Energy and Performance Information Center (EPIC) Secure System and included here as Attachment L).

ATTACHMENT A

GRAND RAPIDS HOUSING COMMISSION
LOW-INCOME PUBLIC HOUSING
DECONCENTRATION POLICY

In accordance with 24 CFR, Part 903, Subpart A, the Grand Rapids Housing Commission has **no** general occupancy (family) public housing developments covered by the deconcentration rule.

Development	# LIPH Units	Developments Not Subject to Deconcentration and Income Mixing Requirements
Adams Park	188	Houses only elderly persons, or persons with disabilities, or both - 24 CFR, 903.2(b)(2)(ii)
Scattered Sites	15	Housing development with fewer than 100 public housing units – 24 CFR, 903.2(b)(2)(i) Only general occupancy, family public housing development operated by PHA – 24 CFR, 903.2(b)(2)(iii)

ATTACHMENT A

GRAND RAPIDS HOUSING COMMISSION
HOUSING CHOICE VOUCHER
DECONCENTRATION POLICY

Purpose

The purpose of the Grand Rapids Housing Commission's Deconcentration Policy is to establish a framework for staff to follow in order to ensure compliance with the requirements to expand housing opportunities as detailed in 24 CFR 982.54, 24 CFR 982.301, and the Housing Commission's Housing Choice Voucher Administrative Plan.

Overview

Public Housing Authorities (PHAs) are responsible for ensuring that very-low income households have access to all types and ranges of affordable housing in the PHA's jurisdiction, particularly housing outside areas of poverty or minority concentration. A critical element in fulfilling this responsibility is for the PHA to enlist a sufficient number of landlords, representing all types and ranges of affordable housing in the PHA's jurisdiction, to participate in the Housing Choice Voucher program and provide information to program participants about this initiative.

Implementation – Landlords

The Grand Housing Commission (GRHC) will conduct regular landlord outreach events to encourage property owners outside of areas of poverty and/or minority concentration to lease units to Housing Choice Voucher (HCV) participants. Educational information will be provided to familiarize owners with the program and how they benefit from participation.
These outreach strategies will include:

- Distributing printed materials about the program to property owners and managers,
- Contacting property owners and managers by phone or in person,
- Holding owner recruitment/information meetings at least once a year,
- Participating in community-based organizations comprised of private property and apartment owners and managers, and
- Developing working relationships with property owners and apartment managers.

Implementation – Participants

The GRHC will affirmatively inform participants of our jurisdiction coverage area at all orientations and/or interviews. HCV participants will not be steered towards specific landlords or areas. Participants will receive information regarding the entire jurisdiction coverage area of the GRHC, be advised of the HUD deconcentration initiatives, provided information which reflects areas of deconcentration, and encouraged to make informed housing decisions.

PART II: SUBSIDY STANDARDS AND VOUCHER ISSUANCE

5-II.A. OVERVIEW

The PHA must establish subsidy standards that determine the number of bedrooms needed for families of different sizes and compositions. This part presents the policies that will be used to determine the family unit size (also known as the voucher size) a particular family should receive, and the policies that govern making exceptions to those standards. The PHA must also establish policies related to the issuance of the voucher, to the voucher term, and to any extensions of the voucher term.

5-II.B. DETERMINING FAMILY UNIT (VOUCHER) SIZE [24 CFR 982.402]

For each family, the PHA determines the appropriate number of bedrooms under the PHA subsidy standards and enters the family unit size on the voucher that is issued to the family. The family unit size does not dictate the size of unit the family must actually lease, nor does it determine who within a household will share a bedroom/sleeping room.

The following requirements apply when the PHA determines family unit size:

- The subsidy standards must provide for the smallest number of bedrooms needed to house a family without overcrowding.
- The subsidy standards must be consistent with space requirements under the housing quality standards.
- The subsidy standards must be applied consistently for all families of like size and composition.
- A child who is temporarily away from the home because of placement in foster care is considered a member of the family in determining the family unit size.
- A family that consists of a pregnant woman (with no other persons) must be treated as a two-person family.
- Any live-in aide (approved by the PHA to reside in the unit to care for a family member who is disabled or is at least 50 years of age) must be counted in determining the family unit size;
- Unless a live-in-aide resides with a family, the family unit size for any family consisting of a single person must be either a zero- or one-bedroom unit, as determined under the PHA subsidy standards.

<u>GRHC Policy</u>

The GRHC will assign one bedroom for each two persons within the household, except in the following circumstances:

Persons of the opposite sex (other than spouses) will be allocated separate bedrooms.

Parent(s) will be allocated a separate bedroom from their children

Live-in aides will be allocated a separate bedroom.

Single person families will be allocated one bedroom.

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The PHA will reference the following chart in determining the appropriate voucher size for a family:

Voucher Size	**Persons in Household** **(Minimum – Maximum)**
1 Bedroom	1-2
2 Bedrooms	2-4
3 Bedrooms	3-6
4 Bedrooms	4-8
5 Bedrooms	6-10

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ATTACHMENT C

Temporary Policy Supplement

EMERGENCY HOUSING VOUCHERS (EHVs)

INTRODUCTION

On March 11, 2021, President Biden signed the American Rescue Plan Act of 2021 (ARP) (P.L. 117-2). Section 3202 of the ARP appropriated $5 billion for the creation, administration, and renewal of new incremental emergency housing vouchers (EHVs) and other eligible expenses related to COVID-19.

On May 5, 2021, HUD issued Notice PIH 2021-15, which described HUD's process for allocating approximately 70,000 EHVs to eligible PHAs and set forth the operating requirements for PHAs who administer them. Based on criteria outlined in the notice, HUD notified eligible PHAs of the number of EHVs allocated to their agency, and PHAs were able to accept or decline the invitation to participate in the program.

PHAs may not project-base EHVs; EHVs are exclusively tenant-based assistance.

All applicable nondiscrimination and equal opportunity requirements apply to the EHV program, including requirements that the PHA grant reasonable accommodations to persons with disabilities, effectively communicate with persons with disabilities, and ensure meaningful access for persons with limited English proficiency (LEP).

This chapter describes HUD regulations and PHA policies for administering EHVs. The policies outlined in this chapter are organized into six sections, as follows:

Part I: Funding

Part II: Partnering Agencies

Part III: Waiting List Management

Part IV: Family Eligibility

Part V: Housing Search and Leasing

Part VI: Use of Funds, Reporting, and Financial Records

Except as addressed by this chapter and as required under federal statute and HUD requirements, the general requirements of the HCV program apply to EHVs.

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PART I: FUNDING

TPS-I.A. FUNDING OVERVIEW

The American Rescue Plan Act of 2021 (ARP) provides administrative fees and funding for the costs of administering emergency housing vouchers (EHVs) and other eligible expenses defined in Notice PIH 2021-15. These fees may only be used for EHV administration and other eligible expenses and must not be used for or applied to other PHA programs or vouchers. The PHA must maintain separate financial records from its regular HCV funding for all EHV funding.

Housing Assistance Payments (HAP) Funding

ARP funding obligated to the PHA as housing assistance payments (HAP) funding may only be used for eligible EHV HAP expenses (i.e., rental assistance payments). EHV HAP funding may not be used for EHV administrative expenses or for the eligible uses under the EHV services fee.

The initial funding term will expire December 31, 2022. HUD will provide renewal funding to the PHA for the EHVs on a calendar year (CY) basis commencing with CY 2023. The renewal funding allocation will be based on the PHA's actual EHV HAP costs in leasing, similar to the renewal process for the regular HCV program. EHV renewal funding is not part of the annual HCV renewal funding formula; EHVs are renewed separately from the regular HCV program. All renewal funding for the duration of the EHV program has been appropriated as part of the ARP funding.

Administrative Fee and Funding

The following four types of fees and funding are allocated as part of the EHV program:

- **Preliminary fees** support immediate start-up costs that the PHA will incur in implementing alternative requirements under EHV, such as outreach and coordination with partnering agencies:
  - $400 per EHV allocated to the PHA, once the consolidated annual contributions contract (CACC) is amended.
  - This fee may be used for any eligible administrative expenses related to EHVs.
  - The fee may also be used to pay for any eligible activities under EHV service fees (TPS-I.B).

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- **Placement fees/expedited issuance reporting fees** will support initial lease-up costs and the added cost and effort required to expedite leasing of EHVs:
  - $100 for each EHV initially leased, if the PHA reports the voucher issuance date in Public Housing Information Center–Next Generation (PIC–NG) system within 14 days of voucher issuance or the date the system becomes available for reporting.
  - Placement fees:
    - $500 for each EHV family placed under a HAP contract effective within four months of the effective date of the ACC funding increment; or
    - $250 for each EHV family placed under a HAP contract effective after four months but less than six months after the effective date of the ACC funding increment.
    - HUD will determine placement fees in the event of multiple EHV allocations and funding increment effective dates.
  - Placement/expedited issuance fees only apply to the initial leasing of the voucher; they are not paid for family moves or to turnover vouchers.
- **Ongoing administrative fees,** which are calculated in the same way as the standard HCV program:
  - PHAs are allocated administrative fees using the full column A administrative fee amount for each EHV under contract as of the first day of each month.
  - Ongoing EHV administrative fees may be subject to proration in future years, based on available EHV funding.
- **Services fees,** which are a one-time fee to support PHAs' efforts to implement and operate an effective EHV services program in its jurisdiction (TPS-I.B):
  - The fee is allocated once the PHA's CACC is amended to reflect EHV funding.
  - The amount allocated is $3,500 for each EHV allocated.

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TPS-I.B. SERVICE FEES

Services fee funding must be initially used for defined eligible uses and not for other administrative expenses of operating the EHV program. Service fees fall into four categories:

- Housing search assistance
- Security deposit/utility deposit/rental application/holding fee uses
- Owner-related uses
- Other eligible uses such as moving expenses or tenant-readiness services

The PHA must establish the eligible uses and the parameters and requirements for service fees in the PHA's administrative plan.

Grand Rapids Housing Commission Policy (GRHC)

The eligible uses for service fees include:

Housing search assistance, which may include activities such as, but not limited to, helping a family identify and visit potentially available units during their housing search, helping to find a unit that meets the household's disability-related needs, providing transportation and directions, assisting with the completion of rental applications and PHA forms, and helping to expedite the EHV leasing process for the family.

Application fees/non-refundable administrative or processing fees/refundable application deposit assistance. The GRHC may choose to assist the family with some or all these expenses.

Holding fees are fees an owner requests that are rolled into the security deposit after an application is accepted but before a lease is signed. The GRHC may cover part or all of the holding fee for units where the fee is required by the owner after a tenant's application has been accepted but before the lease signing. The GRHC and owner must agree how the holding fee gets rolled into the deposit, and under what conditions the fee will be returned. In general, owners need to accept responsibility for making needed repairs to a unit required by the initial housing quality standards (HQS) inspections and can only keep the holding fee if the client is at fault for not entering into a lease.

Security deposit assistance. The amount of the security deposit assistance may not exceed the lesser of two months' rent to owner, the maximum security deposit allowed under applicable state and/or local law, or the actual security deposit required by the owner. The GRHC may pay the security deposit assistance directly to the owner or may pay the assistance to the family. If paid to the family, the GRHC will require documentation that the family paid the security deposit.

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Utility deposit assistance/utility arrears. The GRHC may provide utility deposit assistance for some or all of the family's utility deposit expenses. Assistance can be provided for deposits (including connection fees) required for the utilities to be supplied by the tenant under the lease. The GRHC may pay the utility deposit assistance directly to the utility company or may pay the assistance to the family. If paid to the family, the GRHC will require documentation the family paid the utility deposit. The GRHC will require the utility supplier or family to return the utility deposit assistance to the GRHC at such time the deposit is returned by the utility supplier (less any amounts retained by the utility supplier). In addition, some families may have large balances with gas, electric, water, sewer, or trash companies that will make it difficult if not impossible to establish services for tenant-supplied utilities. The GRHC may also provide the family with assistance to help address these utility arrears to facilitate leasing. Utility deposit assistance returned to the GRHC will be used for either services fee eligible uses or other EHV administrative costs, as required by HUD.

Owner recruitment and outreach for EHVs. The GRHC may use the service fee funding to conduct owner recruitment and outreach specifically for EHVs. In addition to traditional owner recruitment and outreach, activities may include conducting pre-inspections or otherwise expediting the inspection process, providing enhanced customer service, and offering owner incentive and/or retention payments.

Owner incentive and/or retention payments. The GRHC may make incentive or retention payments to owners that agree to initially lease their unit to an EHV family and/or renew the lease of an EHV family.

Payments will be made as a single payment at the beginning of the assisted lease term (or lease renewal if a retention payment). Owner incentive and retentions payments are not housing assistance payments, are not part of the rent to owner, and are not taken into consideration when determining whether the rent for the unit is reasonable.

Moving expenses (including move-in fees and deposits). The GRHC may provide assistance for some or all of the family's reasonable moving expenses when they initially lease a unit with the EHV. The GRHC will not provide moving expenses assistance for subsequent moves unless the family is required to move for reasons other than something the family did or failed to do (e.g., the GRHC is terminating the HAP contract because the owner did not fulfill the owner responsibilities under the HAP contract or the owner is refusing to offer the family the opportunity to enter a new lease after the initial lease term, as opposed to the family choosing to terminate the tenancy in order to move to another unit), or a family has to move due to domestic violence, dating violence, sexual assault, or stalking.

Tenant-readiness services. The GRHC may use fees to help create a customized plan to address or mitigate barriers that individual families may face in renting a unit with an EHV, such as negative credit, lack of credit, negative rental or utility history, or to connect the family to other community resources (including COVID-related resources) that can assist with rental arrears.

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Essential household items. The GRHC may use services fee funding to assist the family with some or all of the costs of acquiring essential household items such as tableware, cooking equipment, beds or bedding, and essential sanitary products such as soap and toiletries.

Renter's insurance if required by the lease. The GRHC may choose to assist the family with some or all this cost.

Any services fee assistance that is returned to the Grand Rapids Housing Commission after its initial or subsequent use may only be applied to the eligible services fee uses defined in Notice PIH 2021-15 (or subsequent notice) or other EHV administrative costs. Any amounts not expended for these eligible uses when the PHA's EHV program ends must be remitted to HUD.

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PART II: PARTNERING AGENCIES

TPS-II.A. CONTINUUM OF CARE (CoC)

PHAs that accept an allocation of EHVs are required to enter into a Memorandum of Understanding (MOU) with the Continuum of Care (CoC) to establish a partnership for the administration of EHVs.

Grand Rapids Housing Commission Policy

The GRHC has entered into an MOU with Kent County (Grand Rapids/Wyoming) Continuum of Care (CoC).

TPS-II.B. OTHER PARTNERING ORGANIZATIONS

The PHA may, but is not required to, partner with other organizations trusted by persons experiencing homelessness, such as victim services providers (VSPs) and other community partners. If the PHA chooses to partner with such agencies, the PHA must either enter into an MOU with the partnering agency or the partnering agency may be added to the MOU between the PHA and CoC.

Grand Rapids Housing Commission Policy

The GRHC has added VSP's and other trusted organizations to the MOU between the Grand Rapids Housing Commission and CoC.

TPS-II.C. REFERRALS

CoC and Partnering Agency Referrals

The primary responsibility of the CoC under the MOU with the PHA is to make direct referrals of qualifying individuals and families to the PHA. The PHA must generally refer a family that is seeking EHV assistance directly from the PHA to the CoC or other referring agency for initial intake, assessment, and possible referral for EHV assistance. Partner CoCs are responsible for determining whether the family qualifies under one of the four eligibility categories for EHVs. The CoC or other direct referral partner must provide supporting documentation to the PHA of the referring agency's verification that the family meets one of the four eligible categories for EHV assistance.

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Grand Rapids Housing Commissions Policy

The CoC and/or partnering agency must establish and implement a system to identify EHV-eligible individuals and families within the agency's caseload and make referrals to the GRHC. The CoC or other partnering agency must certify that the EHV applicants they refer to the GRHC meet at least one of the four EHV eligibility criteria. The GRHC will maintain a copy of the referral or certification from the CoC or other partnering agency in the participant's file along with other eligibility paperwork. Homeless service providers may, but are not required to, use the certification form found in Exhibit TPS-2 of this chapter. Victim services providers may, but are not required to, use the certification form found in Exhibit TPS-3 of this chapter when identifying eligible families who qualify as victims of human trafficking.

As part of the MOU, the GRHC and CoC or other partnering agency will identify staff positions to serve as lead EHV liaisons. These positions will be responsible for transmission and acceptance of referrals. The CoC or partnering agency must commit sufficient staff and resources to ensure eligible individuals and families are identified and determined eligible in a timely manner.

The GRHC's liaison responsible for acceptance of referrals will contact the CoC or partnering agency liaison via email indicating the number of vouchers available and requesting an appropriate number of referrals. No more than five business days from the date the CoC or partnering agency receives this notification, the CoC or partnering agency liaison will provide the GRHC with a list of eligible referrals including the name, address, and contact phone number for each adult individual who is being referred; a completed release form for each adult family member; and a written certification for each referral indicating they are EHV-eligible.

Offers of Assistance with CoC Referral

The PHA may make an EHV available without a referral from the CoC or other partnering organization in order to facilitate an emergency transfer under VAWA in accordance with the PHA's Emergency Transfer Plan (ETP) in Chapter 16.

The GRHC must also take direct referrals from outside the CoC if:

- The CoC does not have a sufficient number of eligible families to refer to the GRHC; or
- The CoC does not identify families that may be eligible for EHV assistance because they are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking.

If at any time the GRHC is not receiving enough referrals or is not receiving referrals in a timely manner from the CoC or other partner referral agencies (or the GRHC and CoC cannot identify any such alternative referral partner agencies), HUD may permit the GRHC on a temporary or permanent basis to take EHV applications directly from applicants and admit eligible families to the EHV program in lieu of or in addition to direct referrals in those circumstances.

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PART III: WAITING LIST MANAGEMENT

TPS-III. A. HCV WAITING LIST

The regulation that requires the PHA to admit applicants as waiting list admissions or special admissions in accordance with admission policies in Chapter 4 does not apply to PHAs operating the EHV program. Direct referrals are not added to the PHA's HCV waiting list.

The PHA must inform families on the HCV waiting list of the availability of EHVs by, at a minimum, either by posting the information to their website or providing public notice in their respective communities in accordance with the requirements listed in Notice PIH 2021-15.

Grand Rapids Housing Commission Policy

The PHA will post information about the EHV program for families on the GRHC's HCV waiting list on their website. The notice will:

Describe the eligible populations to which EHVs are limited

Clearly state that the availability of these EHVs is managed through a direct referral process

Advise the family to contact the CoC (or any other GRHC referral partner, if applicable) if the family believes they may be eligible for EHV assistance

The GRHC will ensure effective communication with persons with disabilities, including those with vision, hearing, and other communication-related disabilities in accordance with Chapter 2. The GRHC will also take reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP) in accordance with Chapter 2.

TPS-III.B. EHV WAITING LIST

The HCV regulations requiring the PHA to operate a single waiting list for admission to the HCV program do not apply to PHAs operating the EHV program. Instead, when the number of applicants referred by the CoC or partnering agency exceeds the EHVs available, the PHA must maintain a separate waiting list for EHV referrals, both at initial leasing and for any turnover vouchers that may be issued prior to September 30, 2023.

Further, the EHV waiting list is not subject to PHA policies in Chapter 4 regarding opening and closing the HCV waiting list. The PHA will work directly with its CoC and other referral agency partners to manage the number of referrals and the size of the EHV waiting list.

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TPS-III.C. PREFERENCES

HCV Waiting List Preferences

If local preferences are established by the PHA for HCV, they do not apply to EHVs. However, if the PHA has a homeless preference or a VAWA preference for the HCV waiting list, the PHA must adopt additional policies related to EHVs in accordance with Notice PIH 2021-15.

Grand Rapids Housing Commission Policy

The GRHC does not offer either a homeless or a VAWA preference for the HCV waiting list.

EHV Waiting List Preferences

With the exception of a residency preference, the PHA may choose, in coordination with the CoC and other referral partners, to establish separate local preferences for EHVs. The PHA may, however, choose to not establish any local preferences for the EHV waiting list.

Grand Rapids Housing Commission Policy

No local preferences have been established for the EHV waiting list.

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PART IV: FAMILY ELIGIBLTY

TPS-IV.A. OVERVIEW

The CoC or referring agency determines whether the individual or family meets any one of the four eligibility criteria described in Notice PIH 2021-15 and then refers the family to the PHA. The PHA determines that the family meets other eligibility criteria for the HCV program, as modified for the EHV program and outlined below.

TPS-IV.B. REFERRING AGENCY DETERMINATION OF ELIGIBLITY

In order to be eligible for an EHV, an individual or family must meet one of four eligibility criteria:

- Homeless as defined in 24 CFR 578.3;
- At risk of homelessness as defined in 24 CFR 578.3;
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking (as defined in Notice PIH 2021-15), or human trafficking (as defined in the 22 U.S.C. Section 7102); or
- Recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability as determined by the CoC or its designee in accordance with the definition in Notice PIH 2021-15.

As applicable, the CoC or referring agency must provide documentation to the PHA of the referring agency's verification that the family meets one of the four eligible categories for EHV assistance. The PHA must retain this documentation as part of the family's file.

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TPS-IV.C. PHA SCREENING

Overview

HUD waived 24 CFR 982.552 and 982.553 in part for the EHV applicants and established alternative requirement for mandatory and permissive prohibitions of admissions. Except where applicable, PHA policies regarding denials in Chapter 3 of this policy do not apply to screening individuals and families for eligibility for an EHV. Instead, the EHV alternative requirement listed in this section will apply to all EHV applicants.

The mandatory and permissive prohibitions listed in Notice PIH 2021-15 and in this chapter, however, apply only when screening the individual or family for eligibility for an EHV. When adding a family member after the family has been placed under a HAP contract with EHV assistance, the regulations at 24 CFR 982.551(h)(2) apply. Other than the birth, adoption, or court-awarded custody of a child, the PHA must approve additional family members and may apply its regular HCV screening criteria in Chapter 3 in doing so.

Mandatory Denials

Under alternative requirements for the EHV program, mandatory denials for EHV applicants include:

- 24 CFR 982.553(a)(1)(ii)(C), which prohibits admission if any household member has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing.
- 24 CFR 982.553(a)(2)(i), which prohibits admission to the program if any member of the household is subject to a lifetime registration requirement under a state sex offender registration program.

The PHA must deny admission to the program if any member of the family fails to sign and submit consent forms for obtaining information as required by 24 CFR 982.552(b)(3) but should notify the family of the limited EHV grounds for denial of admission first.

> <u>Grand Rapids Housing Commission Policy</u>
>
> While the GRHC will deny admission to the program if any adult member (or head of household or spouse, regardless of age) fails to sign and submit consent forms, the GRHC will first notify the family of the limited EHV grounds for denial of admission as part of the notice of denial that will be mailed to the family.

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Permissive Denial

Notice PIH 2021-15 lists permissive prohibitions for which the PHA may, but is not required to, deny admission to EHV families. The notice also lists prohibitions that, while allowable under the HCV program, may not be used to deny assistance for EHV families.

If the PHA intends to establish permissive prohibition policies for EHV applicants, the PHA must first consult with its CoC partner to understand the impact that the proposed prohibitions may have on referrals and must take the CoC's recommendations into consideration.

Grand Rapids Housing Commission Policy

In consultation with the CoC, the GRHC will apply permissive prohibition to the screening of EHV applicants. Determinations using permissive prohibitions will be made based on an individualized assessment of relevant mitigating information in accordance with policies in Section 3-III.E.

The GRHC will establish the following permissive prohibitions:

If the GRHC determines that any household member is currently engaged in, or has engaged in within the previous 12 months:

Violent criminal activity

Other criminal activity that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity

If any member of the family has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program within the previous 12 months.

If the family engaged in or threatened abusive or violent behavior toward GRHC personnel within the previous 12 months.

The Grand Rapids Housing Commission will also deny assistance to household members already receiving assistance from another program in accordance with Section 9.h. of Notice PIH 2021-15.

Prohibitions based on criminal activity for the eligible EHV populations regarding drug possession will be considered apart from criminal activity against persons (i.e., violent criminal activity).

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In compliance with PIH 2021-15, the GRHC **will not** deny an EHV applicant admission regardless of whether:

Any member of the family has been evicted from federally assisted housing in the last five years;

A PHA has ever terminated assistance under the program for any member of the family;

The family currently owes rent or other amounts to the GRHC or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act;

The family has not reimbursed any PHA for amounts paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease;

The family breached an agreement with the GRHC and/or any other PHA to pay amounts owed to the GRHC and/or any other PHA, or amounts paid to an owner by the GRHC or any/PHA;

The family would otherwise be prohibited admission under alcohol abuse standards established by the GRHC in accordance with 24 CFR 982.553(a)(3);

The GRHC determines that any household member is currently engaged in or has engaged in during a reasonable time before the admission, drug-related criminal activity.

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TPS-IV.D. INCOME VERIFICATION AT ADMISSION

Self-Certification at Admission

The requirement to obtain third-party verification of income in accordance with Notice PIH 2018-18 does not apply to the EHV program applicants at admission, and alternatively, PHAs may consider self-certification the highest form of income verification at admission. As such, PHA policies related to the verification of income in Section 7-I.B. do not apply to EHV families at admission. Instead, applicants must submit an affidavit attesting to their reported income, assets, expenses, and other factors that would affect an income eligibility determination.

Additionally, applicants may provide third-party documentation that represents the applicant's income within the 60-day period prior to admission or voucher issuance but is not dated within 60 days of the PHA's request.

Grand Rapids Housing Commission Policy

Any documents used for verification must be the original (not photocopies) and dated within the 60-day period prior to admission. The documents must not be damaged, altered, or in any way illegible.

Printouts from webpages are considered original documents.

Any family self-certifications must be made in a format acceptable to the GRHC and must be signed by the family member whose information or status is being verified.

The GRHC will incorporate additional procedures to remind families of the obligation to provide true and complete information in accordance with Chapter 14. The GRHC will address any material discrepancies (i.e., unreported income or a substantial difference in reported income) that may arise later. The GRHC may, but is not required to, offer the family a repayment agreement in accordance with Chapter 16. If the family fails to repay the excess subsidy, the GRHC will terminate the family's assistance in accordance with the policies in Chapter 12.

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Recently Conducted Income Determinations

PHAs may accept income calculations and verifications from third-party providers or from an examination that the PHA conducted on behalf of the family for another subsidized housing program in lieu of conducting an initial examination of income as long as:

- The income was calculated in accordance with rules outlined at 24 CFR Part 5 and within the last six months; and
- The family certifies there has been no change in income or family composition in the interim.

Grand Rapids Housing Commission Policy

The GRHC will accept income calculations and verifications from third-party providers provided they meet the criteria outlined above.

The family certification must be made in a format acceptable to the GRHC and must be signed by all adult family members whose information or status is being verified.

At the time of the family's annual reexamination the GRHC must conduct the annual reexamination of income as outlined at 24 CFR 982.516 and PHA policies in Chapter 11.

EIV Income Validation

Once HUD makes the EIV data available to PHAs under this waiver and alternative requirement, the PHA must:

- Review the EIV Income and Income Validation Tool (IVT) reports to confirm and validate family-reported income within 90 days of the PIC submission date;
- Print and maintain copies of the EIV Income and IVT Reports in the tenant file; and
- Resolve any income discrepancy with the family within 60 days of the EIV Income or IVT Report dates.

Prior to admission, PHAs must continue to use HUD's EIV system to search for all household members using the Existing Tenant Search in accordance with PHA policies in Chapter 3.

If a PHA later determines that an ineligible family received assistance, the PHA must take steps to terminate that family from the program in accordance with Chapter 12.

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TPS-IV.E. SOCIAL SECURITY NUMBER AND CITIZENSHIP STATUS VERIFICATION

For the EHV program, the PHA is not required to obtain and verify SSN documentation and documentation evidencing eligible noncitizen status before admitting the family to the EHV program. Instead, PHAs may adopt policies to admit EHV applicants who are unable to provide the required SSN or citizenship documentation during the initial eligibility determination. As an alternative requirement, such individuals must provide the required documentation within 180 days of admission to be eligible for continued assistance, pending verification, unless the PHA provides an extension based on evidence from the family or confirmation from the CoC or other partnering agency that the family has made a good-faith effort to obtain the documentation.

If a PHA determines that an ineligible family received assistance, the PHA must take steps to terminate that family from the program.

Grand Rapids Housing Commission Policy

The GRHC will admit EHV applicants who are unable to provide the required SSN or citizenship documentation during the initial eligibility determination. These individuals must provide the required documentation in accordance with policies in Chapter 7 within 180 days of admission. The GRHC may provide an additional 60-day extension based on evidence from the family or confirmation from the CoC or other partnering agency that the family has made a good-faith effort to obtain the documentation.

If the GRHC determines that an ineligible family received assistance, the GRHC will take steps to terminate that family from the program in accordance with policies in Chapter 12.

TPS-IV.F. AGE AND DISABILITY VERIFICATION

PHAs may accept self-certification of date of birth and disability status if a higher level of verification is not immediately available. If self-certification is used, the PHA must obtain a higher level of verification within 90 days of admission or verify the information in EIV.

If a PHA determines that an ineligible family received assistance, the PHA must take steps to terminate that family from the program.

Grand Rapids Housing Commission Policy

The GRHC will accept self-certification of date of birth and disability status if a higher form of verification is not immediately available. The certification must be made in a format acceptable to the GRHC and must be signed by the family member whose information or status is being verified. If self-certification is accepted, within 90 days of admission, the GRHC will verify the information in EIV or through other third-party verification if the information is not available in EIV. The GRHC will note the family's file that self-certification was used as initial verification and include an EIV printout or other third-party verification confirming the applicant's date of birth and/or disability status.

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If the GRHC determines that an ineligible family received assistance, the GRHC will take steps to terminate that family from the program in accordance with policies in Chapter 12.

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TPS-IV.G. INCOME TARGETING

The PHA must determine income eligibility for EHV families in accordance with 24 CFR 982.201 and PHA policy in Chapter 3; however, income targeting requirements do not apply for EHV families. The PHA may still choose to include the admission of extremely low-income EHV families in its income targeting numbers for the fiscal year in which these families are admitted.

Grand Rapids Housing Commission Policy

The GRHC will not include the admission of extremely low-income EHV families in its income targeting numbers for the fiscal year in which these families are admitted.

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PART V: HOUSING SEARCH AND LEASING

TPS-V.A. INITIAL VOUCHER TERM

Unlike the standard HCV program, which requires an initial voucher term of at least 60 days, EHV vouchers must have an initial search term of at least 120 days. PHA policies on extensions as outlined in Section 5-II.E. will apply.

> Grand Rapids Housing Commission Policy
>
> All EHVs will have an initial term of 120 calendar days.
>
> The family must submit a Request for Tenancy Approval and proposed lease within the 120-day period unless the PHA grants an extension.

TPS-V.B. HOUSING SEARCH ASSISTANCE

The PHA must ensure housing search assistance is made available to EHV families during their initial housing search. The housing search assistance may be provided directly by the PHA or through the CoC or another partnering agency or entity.

At a minimum, housing search assistance must:

- Help individual families identify potentially available units during their housing search, including physically accessible units with features for family members with disabilities, as well as units in low-poverty neighborhoods;
- Provide transportation assistance and directions to potential units;
- Conduct owner outreach;
- Assist with the completion of rental applications and PHA forms; and
- Help expedite the EHV leasing process for the family

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Grand Rapids Housing Commission Policy

As identified in the MOU between the GRHC and CoC, the following housing search assistance will be provided to each EHV family:

The GRHC will:

Conduct owner outreach in accordance with policies in Chapter 13

Provide directions to potential units as part of the EHV briefing packet

Expedite the EHV leasing process for the family to the extent practicable and in accordance with policies in this chapter

At least every 15 to 20 days, conduct proactive check-ins via email and telephone with families who are searching with an EHV and remind them of their voucher expiration date

Assign a dedicated landlord liaison for EHV voucher families

The GRHC will seek services of partnering agencies and victim service providers (VSP's) to:

Help families identify potentially available units during their housing search, including physically accessible units with features for family members with disabilities, as well as units in low-poverty neighborhoods

Provide transportation assistance to potential units

Assist the family with the completion of rental applications and required forms

TPS-V.C. HQS PRE-INSPECTIONS

To expedite the leasing process, PHAs may pre-inspect available units that EHV families may be interested in leasing in order to maintain a pool of eligible units.

Grand Rapids Housing Commission Policy

To expedite the leasing process, the GRHC may pre-inspect available units that EHV families may be interested in leasing to maintain a pool of eligible units. If an EHV family selects a unit that passed a HQS pre-inspection (without intervening occupancy) within 45 days of the date of the Request for Tenancy Approval, the unit may be approved provided that it meets all other conditions under 24 CFR 982.305.

The family will be free to select his or her unit.

When a pre-inspected unit is not selected, the GRHC will make every effort to fast-track the inspection process, including adjusting the normal inspection schedule for any required reinspections.

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TPS-V.D. INITIAL LEASE TERM

Unlike in the standard the HCV program, EHV voucher holders may enter into an initial lease that is for less than 12 months, regardless of the PHA policy in Section 9-I.E., Term of Assisted Tenancy.

TPS-V.E. PORTABILITY

The normal HCV portability procedures and requirements outlined in Chapter 10 generally apply to EHVs. Exceptions are addressed below.

Nonresident Applicants

Under EHV, applicant families may move under portability even if the family did not have legal residency in the jurisdiction of the initial PHA when they applied, regardless of PHA policy in Section 10-II.B.

Billing and Absorption

A receiving PHA cannot refuse to assist an incoming EHV family, regardless of whether the PHA administers EHVs under its own ACC.

- If the EHV family moves under portability to another PHA that administers EHVs under its own ACC:
  - The receiving PHA may only absorb the incoming EHV family with an EHV (assuming it has an EHV voucher available to do so).
  - If the PHA does not have an EHV available to absorb the family, it must bill the initial PHA. The receiving PHA must allow the family to lease the unit with EHV assistance and may not absorb the family with a regular HCV when the family leases the unit.
  - Regardless of whether the receiving PHA absorbs or bills the initial PHA for the family's EHV assistance, the EHV administration of the voucher is in accordance with the receiving PHA's EHV policies.
- If the EHV family moves under portability to another PHA that does not administer EHV under its own ACC, the receiving PHA may absorb the family into its regular HCV program or may bill the initial PHA.

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Family Briefing

In addition to the applicable family briefing requirements at 24 CFR 982.301(a)(2) as to how portability works and how portability may affect the family's assistance, the initial PHA must inform the family how portability may impact the special EHV services and assistance that may be available to the family.

The initial PHA is required to help facilitate the family's portability move to the receiving PHA and inform the family of this requirement in writing, taking reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP).

Grand Rapids Housing Commission Policy

In addition to following GRHC policy on briefings in Chapter 5, as part of the briefing packet for EHV families, the GRHC will include a written notice that the GRHC will assist the family with moves under portability.

For limited English proficient (LEP) applicants, the GRHC will provide interpretation services in accordance with the GRHC's LEP plan (See Chapter 2).

Coordination of Services

If the portability move is in connection with the EHV family's initial lease-up, the receiving PHA and the initial PHA must consult and coordinate on the EHV services and assistance that will be made available to the family.

Grand Rapids Housing Commission Policy

For EHV families who are exercising portability, when the PHA contacts the receiving PHA in accordance with Section 10-II.B. Preapproval Contact with Receiving PHA, the PHA will consult and coordinate with the receiving PHA to ensure there is no duplication of EHV services and assistance, and ensure the receiving PHA is aware of the maximum amount of services fee funding that the initial PHA may provide to the receiving PHA on behalf of the family.

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Services Fee

Standard portability billing arrangements apply for HAP and ongoing administrative fees for EHV families.

For service fees funding, the amount of the service fee provided by the initial PHA may not exceed the lesser of the actual cost of the services and assistance provided to the family by the receiving PHA or $1,750, unless the initial PHA and receiving PHA mutually agree to change the $1,750 cap. Service fees are paid as follows:

- If the receiving PHA, in consultation and coordination with the initial PHA, will provide eligible services or assistance to the incoming EHV family, the receiving PHA may be compensated for those costs by the initial PHA, regardless of whether the receiving PHA bills or absorbs.
- If the receiving PHA administers EHVs, the receiving PHA may use its own services fee and may be reimbursed by the initial PHA, or the initial PHA may provide the services funding upfront to the receiving PHA for those fees and assistance.
- If the receiving PHA does not administer EHVs, the initial PHA must provide the services funding upfront to the receiving PHA. Any amounts provided to the receiving PHA that are not used for services or assistance on behalf of the EHV family must promptly be returned by the receiving PHA to the initial PHA.

Placement Fee/Issuance Reporting Fee

If the portability lease-up qualifies for the placement fee/issuance reporting fee, the receiving PHA receives the full amount of the placement component of the placement fee/issuing reporting fee. The receiving PHA is eligible for the placement fee regardless of whether the receiving PHA bills the initial PHA or absorbs the family into its own program at initial lease-up. The initial PHA qualifies for the issuance reporting component of the placement fee/issuance reporting fee, as applicable.

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TPS-V.F. PAYMENT STANDARDS

Payment Standard Schedule

For the EHV program, HUD has waived the regulation requiring a single payment standard for each unit size. Instead, the PHA may, but is not required to, establish separate higher payment standards for EHVs. Lower EHV payment standards are not permitted. If the PHA is increasing the regular HCV payment standard, the PHA must also increase the EHV payment standard if it would be otherwise lower than the new regular HCV payment standard. The separate EHV payment standard must comply with all other HCV requirements with the exception of the alternative requirements discussed below.

Further, if the PHA chooses to establish higher payments standards for EHVs, HUD has provided other regulatory waivers:

- Defining the "basic range" for payment standards as between 90 and 120 percent of the published Fair Market Rent (FMR) for the unit size (rather than 90 to 110 percent).
- Allowing a PHA that is not in a designated Small Area FMR (SAFMR) area or has not opted to voluntarily implement SAFMRs to establish exception payment standards for a ZIP code area above the basic range for the metropolitan FMR based on the HUD published SAFMRs. The PHA may establish an exception payment standard up to 120 percent (as opposed to 110 percent) of the HUD published Small Area FMR for that ZIP code area. The exception payment standard must apply to the entire ZIP code area.
  - The PHA must notify HUD if it establishes an EHV exception payment standard based on the SAFMR.

    <u>Grand Rapids Housing Commission Policy</u>

    The GRHC will establish a higher payment standard amount for EHVs.

Rent Reasonableness

All rent reasonableness requirements apply to EHV units, regardless of whether the PHA has established an alternative or exception EHV payment standard.

Increases in Payment Standards

The requirement that the PHA apply increased payment standards at the family's first regular recertification on or after the effective date of the increase does not apply to EHV. The PHA may, but is not required to, establish an alternative policy on when to apply the increased payment standard, provided the increased payment standard is used to calculate the HAP no later than the effective date of the family's first regular reexamination following the change.

<u>Grand Rapids Housing Commission Policy</u>

The GRHC will establish an alternative policy for increases in the payment standard.

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TPS-V.G. TERMINATION OF VOUCHERS

After September 30, 2023, a PHA may not reissue EHVs when assistance for an EHV-assisted family ends. This means that when an EHV participant (a family that is receiving rental assistance under a HAP contract) leaves the program for any reason, the PHA may not reissue that EHV to another family unless it does so no later than September 30, 2023.

If an applicant family that was issued the EHV is unsuccessful in finding a unit and the EHV expires after September 30, 2023, the EHV may not be reissued to another family.

All EHVs under lease on or after October 1, 2023, may not under any circumstances be reissued to another family when the participant leaves the program for any reason.

An EHV that has never been issued to a family may be initially issued and leased after September 30, 2023, since this prohibition only applies to EHVs that are being reissued upon turnover after assistance to a family has ended. However, HUD may direct PHAs administering EHVs to cease leasing any unleased EHVs if such action is determined necessary by HUD to ensure there will be sufficient funding available to continue to cover the HAP needs of currently assisted EHV families.

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PART VI: USE OF FUNDS, REPORTING, AND FINANCIAL RECORDS

EHV funds allocated to the PHA for HAP (both funding for the initial allocation and HAP renewal funding) may only be used for eligible EHV HAP purposes. EHV HAP funding obligated to the PHA may not be used for EHV administrative expenses or the other EHV eligible expenses under this notice. Likewise, EHV administrative fees and funding obligated to the PHA are to be used for those purposes and must not be used for HAP.

The appropriated funds for EHVs are separate from the regular HCV program and may not be used for the regular HCV program but may only be expended for EHV eligible purposes. EHV HAP funds may not roll into the regular HCV restricted net position (RNP) and must be tracked and accounted for separately as EHV RNP. EHV administrative fees and funding for other eligible expenses permitted by Notice PIH 2021-15 may only be used in support of the EHVs and cannot be used for regular HCVs. EHV funding may not be used for the repayment of debts or any amounts owed to HUD by HUD program participants including, but not limited to, those resulting from Office of Inspector General (OIG), Quality Assurance Division (QAD), or other monitoring review findings.

The PHA must comply with EHV reporting requirements in the Voucher Management System (VMS) and Financial Data Schedule (FDS) as outlined in Notice PIH 2021-15.

The PHA must maintain complete and accurate accounts and other records for the program and provide HUD and the Comptroller General of the United States full and free access to all accounts and records that are pertinent the administration of the EHVs in accordance with the HCV program requirements at 24 CFR 982.158.

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ATTACHMENT D

PART VI: MANUFACTURED HOMES

[24 CFR 982.620 through 982.624; FR Notice 1/18/17]

15-VI.A. OVERVIEW

A manufactured home is a manufactured structure, transportable in one or more parts, that is built on a permanent chassis, and designed for use as a principal place of residence. HCV-assisted families may occupy manufactured homes in two different ways.

(1) A family can choose to rent a manufactured home already installed on a space and the PHA must permit it. In this instance program rules are the same as when a family rents any other residential housing, except that there are special HQS requirements as provided in 15-VI.D below.

(2) HUD also permits an otherwise eligible family that owns a manufactured home to rent a space for the manufactured home and receive HCV assistance with the rent for the space as well as certain other housing expenses. PHAs may, but are not required to, provide assistance for such families.

15-VI.B. SPECIAL POLICIES FOR MANUFACTURED HOME OWNERS WHO LEASE A SPACE

Family Income

In determining the annual income of families leasing manufactured home spaces, the value of the family's equity in the manufactured home in which the family resides is not counted as a family asset.

Lease and HAP Contract

There is a separate Tenancy Addendum (Form 52642-a) and separate HAP Contract (Form 52642) for this special housing type.

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15-VI.C. PAYMENT STANDARD, UTILITY ALLOWANCE AND HAP CALCULATION

Payment Standards

The PHA payment standard for manufactured homes is determined in accordance with 24 CFR 982.505 and is the payment standard used for the PHA's HCV program. It is based on the applicable FMR for the area in which the manufactured home space is located.

The payment standard for the family is the lower of the family unit size (voucher size) or the payment standard for the number of bedroom in the manufactured home.

Utility Allowance

The PHA must establish utility allowances for manufactured home space rental. For the first 12 months of the initial lease term only, the allowance must include an amount for a utility hook-up charge if the family actually incurred a hook-up charge because of a move. This allowance will not be given to a family that leases in place. Utility allowances for manufactured home space must not include the costs of digging a well or installing a septic system.

If the amount of the monthly assistance payment for a family exceeds the monthly rent for the manufactured home space (including the owner's monthly management and maintenance charges), the PHA may pay the remainder to the family, lender, or utility company.

Space Rent

The rent for the manufactured home space (including other eligible housing expenses) is the total of:

- The rent charged for the manufactured home space;
- Owner maintenance and management charges for the space;
- The monthly payments made by the family to amortize the cost of purchasing the manufactured home, including any required insurance and property taxes; and
- The applicable allowance for tenant-paid utilities.

Amortization Costs

The monthly payment made by the family to amortize the cost of purchasing the manufactured home is the debt service established at the time of application to a lender for financing the purchase of the manufactured home if monthly payments are still being made. Any increase in debt service due to refinancing after purchase of the home may not be included in the amortization cost. Debt service for set-up charges incurred by a family may be included in the monthly amortization payments made by the family. In addition, set-up charges incurred before the family became an assisted family may be included in the amortization cost if monthly payments are still being made to amortize the charges.

Housing Assistance Payment

The HAP for a manufactured home space under the housing choice voucher program is the lower of the payment standard minus the TTP or the manufactured home space rent (including other eligible housing expenses) minus the TTP.

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Rent Reasonableness

Initially, and annually thereafter the PHA must determine that the rent for the manufactured home space is reasonable based on rents for comparable manufactured home spaces. The PHA must consider the location and size of the space, and any services and maintenance to be provided by the owner. By accepting the monthly HAP check, the owner certifies that the rent does not exceed rents charged by the owner for comparable unassisted spaces in the manufactured home park or elsewhere.

15-VI.D. HOUSING QUALITY STANDARDS

Under either type of occupancy described in 15-VI.A above, the manufactured home must meet all HQS performance requirements and acceptability criteria discussed in Chapter 8 of this plan. In addition, the following requirement applies:

Manufactured Home Tie-Down

A manufactured home must be placed on the site in a stable manner, and must be free from hazards such as sliding or wind damage. The home must be securely anchored by a tie-down device that distributes and transfers the loads imposed by the unit to appropriate ground anchors to resist overturning and sliding.

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(ATTACHMENT E)

ADMISSIONS AND CONTINUED OCCUPANCY POLICY
ANTOINE COURT APARTMENTS
PERMANENT SUPPORTIVE HOUSING PROGRAM

This Admissions and Continued Occupancy Policy defines the Grand Rapids Housing Commission's policies for the operation of the Antoine Court Apartments incorporating Federal, State, and local law. If there is any conflict between this policy and laws or regulations, the laws and regulations will prevail.

1.0 FAIR HOUSING

It is the policy of the Grand Rapids Housing Commission to fully comply with all Federal, State, and local nondiscrimination laws; the Americans with Disabilities Act; and the U.S. Department of Housing and Urban Development regulations governing Air Housing and Equal Opportunity.

No person shall, on the grounds of race, color, sex, religion, national or ethnic origin, familial status, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under the Grand Rapids Housing Commission's programs.

To further its commitment to full compliance with applicable Civil Rights laws, the Grand Rapids Housing Commission will provide Federal/State/local information to referrals, applicants, and tenants of its housing programs regarding discrimination and any recourse available to them if they believe they may be victims of discrimination. Such information will be made available with the application, and all applicable Fair Housing Information and Discrimination Complaint Forms will be made available at the Grand Rapids Housing Commission office. In addition, all written information and advertisements will contain the appropriate Equal Opportunity language and logo.

The Grand Rapids Housing Commission will assist any family that believes they have suffered illegal discrimination by providing them copies of the appropriate housing discrimination forms. The Grand Rapids Housing Commission will also assist them in completing the forms, if requested, and will provide them with the address of the nearest HUD office of Fair Housing and Equal Opportunity.

2.0 REASONABLE ACCOMMODATION

Sometimes people with disabilities may need a reasonable accommodation in order to take full advantage of the Grand Rapids Housing Commission’s housing programs and related services. When such accommodations are granted, they do not confer special treatment or advantage for the person with a disability; rather, they make the program

accessible to them in a way that would otherwise not be possible due to their disability. This policy clarifies how people can request accommodations and the guidelines the Grand Rapids Housing Commission will follow in determining whether it is reasonable to provide a requested accommodation. Because disabilities are not always apparent, the Grand Rapids Housing Commission will ensure that all referrals, applicants, and tenants are aware of the opportunity to request reasonable accommodations.

2.1 COMMUNICATION

Anyone requesting an application will also receive a Request for Reasonable Accommodation form.

Notifications of re-examination, inspection, appointment, or eviction will include information about requesting a reasonable accommodation. Any notification requesting action by the tenant will include information about requesting a reasonable accommodation.

All decisions granting or denying requests for reasonable accommodations will be in writing.

2.2 QUESTIONS TO ASK IN GRANTING THE ACCOMMODATION

A. Is the requestor a person with disabilities? For this purpose, the definition of person with disabilities is different than the definition used for admission. The Fair Housing definition used for this purpose is:

> A person with a physical or mental impairment that substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having such an impairment (the disability may not be apparent to others, i.e., a heart condition).

If the disability is apparent or already documented, the answer to this question is yes. It is possible that the disability for which the accommodation is being requested is a disability other than the apparent disability? If the disability is not apparent or documented, the Grand Rapids Housing Commission will obtain verification that the person is a person with a disability.

B. Is the requested accommodation related to the disability? If it is apparent that the request is related to the apparent or documented disability, the answer to this question is yes. If it is not apparent, the Grand Rapids Housing Commission will obtain documentation that the requested accommodation is needed due to the disability. The Grand Rapids Housing Commission will not inquire as to the nature of the disability.

C. Is the requested accommodation reasonable? In order to be determined

reasonable, the accommodation must meet two criteria:

1. Would the accommodation constitute a fundamental alteration? The Grand Rapids Housing Commission's business is housing. If the request would alter the fundamental business that the Grand Rapids Housing Commission conducts, that would not be reasonable. For instance, the Grand Rapids Housing Commission would deny a request to have the Grand Rapids Housing Commission do grocery shopping for a person with disabilities.

2. Would the requested accommodation create an undue financial hardship or administrative burden? Frequently, the requested accommodation costs little or nothing. If the cost would be an undue burden, the Grand Rapids Housing Commission may request a meeting with the individual to investigate and consider equally effective alternatives.

D. Generally, the individual knows best what it is they need; however, the Grand Rapids Housing Commission retains the right to be shown how the requested accommodation enables the individual to access or use the Grand Rapids Housing Commission's programs or services.

If more than one accommodation is equally effective in providing access to the Grand Rapids Housing Commission's programs and services, the Grand Rapids Housing Commission retains the right to select the most efficient or economic choice.

The cost necessary to carry out approved requests, including requests for physical modifications, will be borne by the Grand Rapids Housing Commission if there is no one else willing to pay for the modifications. If another party pays for the modification, the Grand Rapids Housing Commission will seek to have the same entity pay for any restoration costs.

If the tenant requests, as a reasonable accommodation, that they may be permitted to make physical modifications at their own expense, the Grand Rapids Housing Commission will generally approve such request if it does not violate codes or affect the structural integrity of the unit.

Any request for an accommodation that would enable a tenant to materially violate essential lease terms will not be approved, i.e. allowing nonpayment of rent, destruction of property, disturbing the peaceful enjoyment of others, etc.

3.0 SERVICES FOR NON-ENGLISH SPEAKING APPLICANTS AND RESIDENTS

The Grand Rapids Housing Commission will endeavor to have bilingual staff or access to

people who speak languages other than English in order to assist non-English speaking families. The following languages shall be covered: Spanish

4.0 FAMILY OUTREACH

4.1 PERMANENT SUPPORTIVE HOUSING

Antoine Court has 18 units of Permanent Supportive Housing (PSH) which operates within the local Continuum of Care. As such, program applicants, who are facing chronic homelessness, are referred to Antoine Court Apartments by the local Housing Assessment and Resource Agency (HARA), the Salvation Army, for housing and supportive services in Grand Rapids. Any outreach activities and chosen media is made by the centralized intake and/or Continuum of Care.

5.0 RIGHT TO PRIVACY

All family members, 18 years and older of referral, applicant, and tenant households are required to sign HUD Form-9886, Authorization for Release of Information and Privacy Act Notice. The Authorization for Release of Information and Privacy Act Notice states how family information will be released and includes the Federal Privacy Act Statement.

Any request for referral, applicant, or tenant information will not be released unless there is a signed release of information request from the referral, applicant, or tenant.

6.0 REQUIRED POSTINGS

In each of its offices, the Grand Rapids Housing Commission will post, in a conspicuous place and at a height easily read by all persons including persons with mobility disabilities, the following information:

A. Statement of Policies and Procedures governing Admission and Continued Occupancy (ACOP).

B. Notice of the status of the waiting list (opened or closed).

C. A listing of all the developments by name, address, number of units, units designed with special accommodations, address of all project offices, office hours, telephone numbers, TDD numbers, and Resident Facilities and operation hours.

D. Income Limits for Admission.

E. Excess Utility Charges.

F. Utility Allowance Schedule.

G. Current Schedule of Routine Maintenance Charges.

H. Dwelling Lease.

I. Grievance Procedure.

J. Fair Housing Poster.

K. Equal Opportunity in Employment Poster.

L. Any current Grand Rapids Housing Commission Notices.

7.0 TAKING REFERRALS AND APPLICATIONS

7.1 PSH REFERRALS

Prospective residents of the Antoine Court PSH program are families experiencing homelessness and are referred by the HARA (the Salvation Army) for housing and supportive services.

Families receiving a referral to the Antoine Court PSH program will meet with the on-site Social Worker to complete an intake interview and pre-application. The pre-application requires the family to provide limited basic information establishing homelessness, eligibility, and any preferences to which they may be entitled.

Completed pre-applications will be dated, time stamped, and accepted for all referrals.

Persons with disabilities who require a reasonable accommodation in completing a pre-application may call the Antoine Court Apartments at 235-2865 to make special arrangements. A telecommunication Device for the Deaf (TDD) is available for the deaf. The TDD telephone number is 1-800-649-3777.

The referred family may, at any time, report changes in their pre-application including changes in family composition, income, or preference factors. The Housing Commission will annotate the applicant's file with any updated information.

8.0 ELIGIBILITY FOR ADMISSION

8.1 INTRODUCTION

There are five (5) eligibility requirements for admission to the Antoine Court Apartments: qualifies as a family, has an income within the income limits, meets citizenship/eligible immigrant criteria, provides documentation of Social Security numbers, and signs consent authorization documents. In addition to the eligibility criteria, families must also meet the federally mandated screening criteria Grand Rapids

Housing Commission's screening criteria in order to be admitted.

8.2 ELIGIBILITY CRITERIA

A. Family Status.

1. Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, the following: A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or,

2. A group of persons residing together, and such group includes, but is not limited to:
   a. A **family with or without children** (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
   b. An **elderly family**, which is:
      i. A family whose head, spouse, or sole member is a person who is at least 62 years of age;
      ii. Two (2) or more persons who are at least 62 years of age living together; or
      iii. One (1) or more persons who are at least 62 years of age living with one or more live-in aides
   c. A Near-elderly family;
   d. A disabled family;
      i. A family whose head, spouse, or sole member is a person with disabilities;
      ii. Two (2) or more persons with disabilities living together; or
      iii. One (1) or more persons with disabilities living with one or more live-in aides.
   e. A **displaced fam**ily; which is a family in which each member, or whose sole member, has been displaced by governmental action, or whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal disaster relief laws.
   f. A **remaining member of a tenant family**, which is a person who is considered a member of the family on the most recent certification.
   g. A single person who is not an elderly or displaced person, a person with disabilities, or the remaining member of a tenant family.

B. Income Eligibility.

1. To be eligible for admission to the Antoine Court Apartments PSH

program, the family's annual income must meet the income targeting schedule as defined by HUD. This means the family income for PSH families cannot exceed 30% of the median income for the area.

2. Income limits apply only at admission and are not applicable for continued occupancy.

3. A family may not be admitted to the Antoine Court Apartments from another assisted housing program without meeting the income requirements of the Sheldon Apartments' PSH program.

C. Citizenship Eligibility Status.

1. To be eligible each member of the family must be a citizen, national, or a noncitizen who has eligible immigration status under one of the categories set forth in Section 214 of the Housing and Community Development Act of 1980 (see 42 U.S.C. 1436a(a)).

2. Family Eligibility for Assistance.

   a. A family shall not be eligible for assistance unless every member of the family residing in the unit is determined to have eligible status, with the exception noted below in Paragraph 2b.
   b. Despite the ineligibility of one or more family members, a mixed family may be eligible for one of three types of assistance. (See Section 13.6 for calculating rents under the noncitizen rule).
   c. A family without any eligible members and receiving assistance on June 19, 1995 may be eligible for temporary deferral of termination of assistance.

D. Social Security Number Documentation.

To be eligible, all household members of the applicant family must disclose and verify their assigned Social Security number. The Grand Rapids Housing Commission will deny the eligibility of the applicant family for failure to meet this criteria. However, if the family is otherwise eligible to participate in the program, the family may maintain their position on the waiting list for a 90-day period to comply with the Social Security number disclosure and verification requirements. If all household members have not disclosed and verified their Social Security number at the time a unit becomes available, the Grand Rapids Housing Commission must offer the available unit to the next eligible applicant family on the waiting list. If the family is still unable to meet the Social Security number disclosure and verification requirements at the expiration of the 90-day period, the Housing Commission will default the application.

In accordance with 24 CFR 5.215, applicants are required to disclose their assigned Social Security number with the exception of the following individuals:

1. Those individuals who do not contend to have eligible immigration status (individuals who may be unlawfully present in the United States). These individuals in most instances would not be eligible for a Social Security number.

    a. A family that consists of a single household member (including a pregnant individual) who does not have eligible immigration status is **not eligible** for housing assistance and cannot be housed.

    b. A family that consists of two (2) or more household members and at least one household member that has eligible immigration status, is classified as a mixed family, and is eligible for prorated assistance in accordance with 24 CFR 5.520. The Grand Rapids Housing Commission will not deny assistance to mixed families due to nondisclosure of a Social Security number by an individual who does not contend to have eligible immigration status.

Acceptable means of documentation to verify the Social Security number is the original Social Security card. If the card is not available, the Grand Rapids Housing Commission will accept an original Social Security Administration issued document, which contains the name and Social Security number of the individual or an original document issued by a federal, state, or local government agency, which contains the name and Social Security number of the individual.

The Grand Rapids Housing Commission may reject documentation of the Social Security number provided by the applicant for only the following reasons:

1. The document is not an original document; or
2. The original document has been altered, mutilated, or not legible; or
3. The document appears to be a forged document (i.e. does not appear to be authentic).

Should the documentation be found to be unacceptable, Housing Commission staff will advise the applicant the reason(s) the document is not acceptable and request the individual to obtain acceptable documentation of the Social Security number and submit it to the Grand Rapids Housing Commission within 90 days. Should the applicant be unable to provide the acceptable documentation within the 90-day period, the application will be defaulted.

E. Signing Consent Forms.

1. In order to be eligible, each member of the family who is at least 18 years of age, and each family head and spouse regardless of age, shall sign one or more consent forms.

2. The consent form must contain, at a minimum, the following:

   a. A provision authorizing HUD or the Grand Rapids Housing Commission to obtain from the National Directory of New Hires (NDNH) any information or materials necessary to complete or verify the application for participation or for eligibility for continued occupancy;

   b. A provision authorizing HUD or the Grand Rapids Housing Commission to verify with previous or current employers' income information pertinent to the family's eligibility for or level of assistance;

   c. A provision authorizing HUD or the Grand Rapids Housing Commission to request income information from the IRS and the SSA for the sole purpose of verifying income information pertinent to the family's eligibility or level of benefits; and

   d. A statement that the authorization to release the information requested by the consent form expires 15 months after the date the consent form is signed.

8.3 SUITABILITY

The Grand Rapids Housing Commission is incorporating a Housing First Model for Permanent Supportive Housing referrals. Therefore, the typical Suitability Screening performed by Housing Commission staff will not be conducted for Permanent Supportive Housing referrals.

8.4 GROUNDS FOR DENIAL

The Grand Rapids Housing Commission is not required or obligated to assist referrals/applicants who:

A. Do not meet one or more of the eligibility criteria.

B. Do not supply information or documentation required by the application process;

C. Have failed to respond to a written request for information on a request to declare their continued interest in the program;

D. Have a recent history of criminal activity by any household member involving crimes of physical violence against persons or property;

E. Currently owes rent, other amounts, or adverse action to any housing

authority in connection with federally assisted housing programs;

F. Were evicted from assisted housing within five (5) years of the projected date of admission because of drug-related criminal activity involving the illegal manufacture, sale, distribution, or possession with the intent to manufacture, sell, distribute a controlled substance as defined in Section 102 of the Controlled Substances Act, 21 U.S.C. 802;

G. Have engaged in or threatened abusive or violent behavior towards any Grand Rapids Housing Commission staff or residents;

H. **Denied for Life**: If a household member has been convicted of manufacturing or producing methamphetamine (speed) in a public housing development or in a Section 8 assisted property;

I. **Denied for Lif**e: Has a lifetime registration under a State sex offender registration program.

8.5 INFORMAL REVIEW

A. If the Grand Rapids Housing Commission determines that a referral/applicant does not meet the criteria for receiving housing assistance, the Grand Rapids Housing Commission will promptly provide the referral/applicant with written notice of the determination. The notice must contain a brief statement of the reason(s) for the decision and state that the referral/applicant may request an informal review of the decision within ten (10) calendar days of the denial. The Grand Rapids Housing Commission will describe how to obtain the informal review.

The informal review may be conducted by any person designated by the Grand Rapids Housing Commission, other than the person who made or approved the decision under review or any subordinate of this person. The referral/applicant must be given the opportunity to present written or oral objections regarding the Grand Rapids Housing Commission's decision. The Grand Rapids Housing Commission must notify the applicant of the final decision within fourteen (14) calendar days after the informal review, including a brief statement of the reasons for the final decision.

B. The participant family may request that the Grand Rapids Housing Commission provide for an Informal Hearing after the family has notification of an INS decision on their citizenship status on appeal, or in lieu of request of appeal to the INS. This request must be made by the participant family within 30 days of receipt of the Notice of Denial or Termination of Assistance, or within 30 days of receipt of the INS appeal decision.

For the participant families, the Informal Hearing Process above will be utilized

with the exception that the participant family will have up to 30 days of receipt of the Notice of Denial or Termination of Assistance, or of the INS appeal decision.

9.6 MISSED APPOINTMENTS

9.6.1 REFERRAL AND APPLICANT FAMILIES

All applicants who fail to keep a scheduled appointment with the Grand Rapids Housing Commission will be sent a notice of termination of the process for eligibility.

The Grand Rapids Housing Commission will allow the family to reschedule without good cause. Generally, no more than one opportunity will be given to reschedule without good cause, and no more than two opportunities will be given for good cause. When good cause exists for missing an appointment, the Grand Rapids Housing Commission will work closely with the family to find a more suitable time. Applicants will be offered the right to an informal review before being removed from the waiting list.

9.6.2 APPLICANT FAMILIES

All applicants who fail to keep a scheduled appointment with the Grand Rapids Housing Commission will be sent a notice of termination of the process for eligibility.

The Grand Rapids Housing Commission will allow the family to reschedule without good cause. Generally, no more than one opportunity will be given to reschedule without good cause, and no more than two opportunities will be given for good cause. When good cause exists for missing an appointment, the Grand Rapids Housing Commission will work closely with the family to find a more suitable time. Applicants will be offered the right to an informal review before being removed from the waiting list.

9.7 NOTIFICATION OF NEGATIVE ACTIONS

Any applicant whose name is being removed from the waiting list will be notified by the Grand Rapids Housing Commission, in writing, that they have ten (10) calendar days from the date of the written correspondence to present mitigating circumstances or request an informal review. The letter will also indicate that their name will be removed from the waiting list if they fail to respond within the timeframe specified. The Grand Rapids Housing Commission system of removing applicant names from the waiting list will not violate the rights of persons with disabilities. If an applicant claims that their failure to respond to a request for information or updates was caused by a disability, the Grand Rapids Housing Commission will verify that there is in fact a disability and the disability caused the failure to respond, and provide a reasonable accommodation. An example of a reasonable accommodation would be to reinstate the applicant on the waiting list based on the date and time of the original application.

10.0 TENANT SELECTION AND ASSIGNMENT PLAN

10.1 PREFERENCES

The Grand Rapids Housing Commission will select families based on the following preferences in the order noted below (i.e., Preference A will be selected before Preference B; Preference B will be selected before Preference C, and so forth).

A. Displaced person(s): Individuals or families displaced by government action or whose dwelling has been extensively damaged or destroyed as a result of circumstance such as fire or lead paint or a disaster declared or otherwise formally recognized pursuant to Federal Disaster Relief Laws.

B. Families who live in the City limits of Grand Rapids whom are Veterans or surviving spouses of veterans.

C. All other families who live in the City limits of Grand Rapids.

D. Families who do not live within the City limits of Grand Rapids whom are Veterans or surviving spouses of Veterans.

E. All other families that do not live in the City limits of Grand Rapids.

The date and time of the referral will be noted and utilized to determine the sequence within the above-prescribed preferences.

Notwithstanding the above, families who are elderly, disabled, or displaced will be offered housing before other single persons.

Units Designated for Permanent Supportive Housing: Preference will be given to families referred to the Antoine Court PSH program. If there are no PSH referred families, the units will be filled with an otherwise eligible family. The next available unit will then be designated for a PSH referral in order to maintain 18 PSH units. All such families will be selected from the waiting list using the preferences as outlined above.

Accessible Units: Accessible units will be first offered to families who may benefit from the accessible features. Referrals/Applicants for these units will be selected utilizing the same preference system as outlined above. If there are no referrals/applicants who would benefit from the accessible features, the units will be offered to other referrals/applicants in the order that their names come to the top of the waiting list. Such referrals/applicants, however, must sign a release form stating they will accept a transfer (at their own expense) if, at a future time, a family requiring an accessible feature applies. Any family required to transfer will be given 30 days' notice.

10.2 ASSIGNMENT OF BEDROOM SIZES

The following guidelines will determine each family's unit size without overcrowding or over-housing:

Number of Bedrooms	Number of Persons	
	Minimum	Maximum
1	1	2

These standards are based on the assumption that each bedroom will accommodate no more than two (2) persons. Two adults will share a bedroom unless related by blood.

10.3 OFFER OFA UNIT

When the Grand Rapids Housing Commission determines that a unit will become available, it will contact the HARA (the Salvation Army) for an appropriate referral.

The family will be contacted in writing of a unit opening by the Antoine Court staff and an intake interview will be scheduled and conducted. Once the referral is given final approval by the Asset Manager, the referred family will be contacted and offered a unit.

The family will be offered the opportunity to view the unit. After the opportunity to view the unit, the family will have two (2) business days to accept or reject the unit. This verbal offer and the family's decision must be documented in the referred family's file. If the family rejects the offer of the unit, the Grand Rapids Housing Commission will send the family a letter documenting the offer and the rejection.

10.4 REJECTION OF A UNIT

If the family rejects any unit offered with good cause, they will not forfeit their referral date and time. The family will keep their preferences and be offered the next available PSH unit. The HARA (the Salvation Army) will be advised of the status of the referral.

If the family rejects any unit offered without good cause, the referral will be returned to the HARA (the Salvation Army) with the disposition of the referral noted. If, at a later date, the family desires to be considered for housing at the Antoine Court PSH program, they must return to the HARA (the Salvation Army) for another referral.

10.5 ACCEPTANCE OFA UNIT

The referred family will be required to sign a lease that will become effective no later than three (3) business days after the date of acceptance or the business day after the

day the unit becomes available, whichever is later and prior to occupancy.

When the referred family is initially accepted for occupancy and prior to signing the lease, the head of household and all other adult family members will be required to attend the Lease and Occupancy Orientation.

The family will be provided a copy of the Lease, the Grievance Procedure, the current schedule of routine maintenance charges, and a Request for Reasonable Accommodation Form. These documents will be explained in detail. The family will sign a certification that they have received these documents and that they have reviewed them with Housing Commission personnel. The certification will be filed in the tenant's file.

The signing of the Lease and the review of financial information are to be privately handled. The head of household and all adult family members will be required to execute the lease prior to admission. One executed copy of the lease will be furnished to the head of household and the Grand Rapids Housing Commission will retain the original executed lease in the tenant's file. A copy of the Grievance Procedure will be attached to the tenant's copy of the lease.

The family will pay a Security Deposit at the time of lease signing. The Security Deposit will be equal to the Total Tenant Payment or that amount which is limited by Michigan Rent Security Deposit Law.

In exceptional situations, the Grand Rapids Housing Commission reserves the right to allow a new tenant to pay their Security Deposit in up to three (3) payments. One third shall be paid in advance, one third with their second rent payment, and one third with their third rent payment. The former shall be at the sole discretion of the Housing Commission.

11.0 INCOME, EXCLUSIONS FROM INCOME, AND DEDUCTIONS FROM INCOME

To determine annual income, the Grand Rapids Housing Commission counts the income of all family members, excluding the types and sources of income that are specifically excluded. Once the annual income is determined, the Grand Rapids Housing Commission subtracts all allowable deductions (allowances) to determine the Total Tenant Payment.

11.1 ANNUAL INCOME

Annual income means all amounts, monetary or not, that:

A. Go to (or on behalf of) the family head of household or spouse (even if temporarily absent) or to any other family member; or

B. Are anticipated to be received from a source outside the family during the 12-month period following admission or annual re-examination effective date; and

C. Are not specifically excluded from annual income.

Annual income includes, but is not limited to:

A. The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services.

B. The net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness are not used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight-line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession is included in income, except to the extent the withdrawal is a reimbursement of cash or assets invested in the operation by the family.

C. Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness are not used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight-line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from an investment is included in income, except to the extent the withdrawal is reimbursement of cash or assets invested by the family. Where the family has net family assets in excess of $5,000, annual income includes the greater of the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate, as determined by HUD.

D. The full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts, including a lump-sum amount or prospective monthly amounts for the delayed start of a periodic amount. (However, deferred periodic amounts from supplemental security income and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts are excluded.)

E. Payments in lieu of earnings, such as unemployment and disability compensation, Worker's Compensation, severance pay, TANF and general welfare assistance. (However, lump sum additions such as insurance payments from Worker's Compensation are excluded.)

F. Welfare assistance.

1. If the welfare assistance payment includes an amount specifically designated for shelter and utilities that is subject to adjustment by the welfare assistance agency in accordance with the actual cost of shelter and utilities, the amount of welfare assistance income to be included as income consists of:

    a. The amount of the allowance or grant exclusive of the amount specifically designated for shelter or utilities; plus

    b. The maximum amount that the welfare assistance agency could in fact allow the family for shelter and utilities. If the family's welfare assistance is ratably reduced from the standard of need by applying a percentage, the amount calculated under this requirement is the amount resulting from one application of the percentage.

2. If the amount of welfare is reduced due to an act of fraud by a family member or because of any family member's failure to comply with requirements to participate in an economic self-sufficiency program or work activity, the amount of rent required to be paid by the family will not be decreased. In such cases, the amount of income attributable to the family will include what the family would have received had they complied with the welfare requirements and/or had not committed an act of fraud.

3. If the amount of welfare assistance is reduced as a result of a lifetime time limit, the reduced amount is the amount that shall be counted as income.

G. Periodic and determinable allowances, such as alimony, child support payments, and regular contributions or gifts received from organizations or from persons not residing in the dwelling.

H. All regular pay, special pay, and allowances of a member of the Armed Forces. (Special pay to a member exposed to hostile fire is excluded.)

11.2 EXCLUSIONS FROM INCOME

Annual income does not include the following:

A. Income from employment of children (including foster children) under the age of 18 years;

B. Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the tenant family, who are unable to live alone);

C. Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains, and settlement for personal or property losses;

D. Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member;

E. Income of a live-in aide;

F. The full amount of student financial assistance paid directly to the student or to the educational institution;

G. The special pay to a family member serving in the Armed Forces who is exposed to hostile fire;

H. The amounts received from the following programs:

1. Amounts received under training programs funded by HUD;

2. Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS);

3. Amounts received by a participant in other publicly assisted programs that are specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, child care, etc.) and that are made solely to allow participation in a specific program;

4. Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed $200 per month) received by a resident for performing a service for the Housing Commission or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, and resident initiatives coordination. No resident may receive more than one such stipend during the same period of time;

5. Incremental earnings and benefits resulting to any family member from participation in qualifying State or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the employment training program;

6. Temporary, nonrecurring or sporadic income (including gifts);

7. Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;

8. Earnings in excess of $480 for each full-time student 18 years old or older (excluding the head of household and spouse);

9. Adoption assistance payments in excess of $480 per adopted child;

10. For family members who enrolled in certain training programs prior to 10/1/99, the earnings and benefits resulting from the participation if the program provides employment training and supportive services in accordance with the Family Support Act of 1988, Section 22 of the 1937 Act (42 U.S.C. 1437t), or any comparable Federal, State, or local law during the exclusion period. For purposes of this exclusion the following definitions apply:

    a. Comparable Federal, State or local law means a program providing employment training and supportive services that:

        i. Is authorized by a Federal, State or local law;
        ii. Is funded by the Federal, State or local government;
        iii. Is operated or administered by a public agency; and
        iv. Has as its objective to assist participants in acquiring employment skills.

    b. Exclusion period means the period during which the family member participates in a program described in this section, plus 18 months from the date the family member begins the first job acquired by the family member after completion of such program that is not funded by public housing assistance under the 1937 Act. If the family member is terminated from employment with good cause, the exclusion period shall end.

    c. Earnings and benefits mean the incremental earnings and benefits resulting from a qualifying employment training program or subsequent job.

11. The entire amount of earned income that is greater than the family's former income is excluded for the first 12 months following the point when the employment begins, and 50-percent of the increased amount is excluded for the second 12 months after the beginning of employment. The maximum term for the combined full and 50 per cent exclusion of 48 months begins the month following the time of the first employment-related exclusion. This exclusion (paragraph 11) will not apply for any family who concurrently is eligible for exclusion #10. Additionally, this exclusion is only available to the following families:

    a. Families whose income increases as a result of employment of a family member who was previously unemployed for one (1) or more years. A person is considered to have been unemployed if

they have earned less money in the previous twelve (12) months than would have been earned working ten (10) hours per week for fifty (50) weeks at the established minimum wage.

b. Families whose income increases during the participation of a family member in any family self-sufficiency program.

c. Families who are or were, within 6 months, assisted under a State TANF program.

12. Deferred periodic amounts from supplemental security income and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts;

13. Amounts received by the family in the form of refunds or rebates under State or local law for property taxes paid on the dwelling unit;

14. Amounts paid by a State agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home; or

15. Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility or benefits. These exclusions include:

a. The value of the allotment of food stamps.

b. Payments to volunteers under the Domestic Volunteer Services Act of 1973.

c. Payments received under the Alaska Native Claims Settlement Act.

d. Income from submarginal land of the U.S. that is held in trust for certain Indian tribes.

e. Payments made under Health and Human Services' Low-Income Energy Assistance Program.

f. Payments received under the Job Training Partnership Act.

g. Income from the disposition of funds of the Grand River Band of Ottawa Indians.

h. The first $2000 per capita received from judgment funds awarded for certain Indian claims.

i. Amount of scholarships awarded under Title IV including Work Study.

j. Payments received under the Older Americans Act of 1965.

k. Payments from Agent Orange Settlement.

l. Payments received under the Maine Indian Claims Act.

m. The value of child care under the Child Care and Development Block Grant Act of 1990.

n. Earned income tax credit refund payments.

o. Payments for living expenses under the Americorps Program.

p. Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation.

q. Any allowance paid under the provisions of 38 U.S.C. 1805 to a child suffering from spina bifida who is the child of a Vietnam veteran.

r. Any amount of crime victim compensation under the Victims of Crime Act.

s. Allowances, earnings and payments to individuals participating in programs under the Workforce Investment Act of 1998.

The Grand Rapids Housing Commission will not provide exclusions from income in addition to those already provided for by HUD.

11.3 DEDUCTIONS FROM ANNUAL INCOME

The following deductions will be made from annual income:

A. $480 for each dependent.

B. $400 for any elderly family or disabled family.

C. For any family that is not an elderly or disabled family but has a member (other than the head or spouse) who is a person with a disability, disability assistance expenses in excess of 3% of annual income. This allowance may not exceed the employment income received by family members who are 18 years of age or older as a result of the assistance to the person with disabilities.

D. For any elderly or disabled family:

1. That has no disability assistance expenses, an allowance for medical expenses equal to the amount by which the medical expenses exceed 3% of annual income.
2. That has disability expenses greater than or equal to 3% of annual income, an allowance for disability assistance expenses computed in accordance with paragraph C, plus an allowance for medical expenses that equal the family's medical expenses.

3. That has disability assistance expenses that are less than 3% of annual income, an allowance for combined disability assistance expenses and medical expenses that are equal to the total of these expenses less 3% of annual income.

E. Child care expenses that enable a family member to be gainfully employed or to further his/her education.

12.0 VERIFICATION

The Grand Rapids Housing Commission will verify information related to waiting list preferences, eligibility, admission, and level of benefits prior to admission. Periodically during occupancy, items related to eligibility and rent determination shall also be reviewed and verified. Income, assets, and expenses will be verified, as well as disability status, need for a live-in aide and other reasonable accommodations; full time student status of family members 18 years of age and older; Social Security numbers; and citizenship/eligible non-citizen status. Age and relationship will only be verified in those instances where needed to make a determination of level of assistance.

12.1 ACCEPTABLE METHODS OF VERIFICATION

Age, relationship, U.S. citizenship, and Social Security numbers will generally be verified with documentation provided by the family. For citizenship, the family's declaration will be accepted. Verification of the family’s declaration may be required.

Documents that can be used as proof include a U.S. passport, U.S. birth certificate, a temporary resident card, or a document referenced by Department of Homeland Security.

Other information will be verified by third-party verification. This type of verification includes written documentation with forms sent or faxed directly to and received directly by a source, not passed through the hands of the family. This verification may also be direct contact with the source, in person or by telephone. It may also be a report generated by a request from the Grand Rapids Housing Commission or automatically by another government agency, i.e. the Social Security Administration. Verification forms and reports received will be contained in the applicant/tenant file. Oral third-party documentation will include the same information as if the documentation had been written, i.e. name, date of contact, amount received, etc.

When third-party verification cannot be obtained, the Grand Rapids Housing Commission will accept documentation received from the applicant/tenant. Hand-carried documentation will be accepted if the Grand Rapids Housing Commission has been unable to obtain third-party verification in a 4-week period of time. Photocopies of the documents provided by the family will be maintained in the file.

When neither third-party verification nor hand-carried verification can be obtained, the Grand Rapids Housing Commission will accept a notarized statement signed by the head, spouse or co-head. Such documents will be maintained in the file.

12.2 TYPES OF VERIFICATION

The chart below outlines the factors that may be verified and gives common examples of the verification that will be sought. To obtain written third-party verification, the Grand Rapids Housing Commission will send a request form to the source along with a release form signed by the applicant/tenant via first class mail.

Verification Requirements for Individual Items

Item to Be Verified	3rd Party Verification	Hand-Carried Verification
General Eligibility Items		
Social Security Number		Social Security card. Original SSA document with name and SSN, original document issued by federal, state, or local government agency with name and SSN of the individual.
Citizenship	N/A	Signed declaration, U.S. passport, U.S. birth certificate, a temporary resident card, or a document referenced by the Department of Homeland Security.
Eligible Immigration Status	INS SAVE confirmation #	INS card
Disability	Letter from medical professional, SSI, etc.	Proof of SSI or Social Security disability payments
Full time student status (if >18)	Letter from school	For high school students, any document evidencing enrollment
Need for a live-in aide	Letter from doctor or other professional knowledgeable of condition	N/A

Verification Requirements for Individual Items		
Item to Be Verified	**3rd Party Verification**	**Hand-Carried Verification**
Child care costs	Letter from care provider	Bills and receipts
Disability assistance expenses	Letters from suppliers, care givers, etc.	Bills and records of payment
Medical expenses	Letters from providers, prescription record from pharmacy, medical professional's letter stating assistance or a companion animal is needed	Bills, receipts, records of payment, dates of trips, mileage log, receipts for fares and tolls
Value of and Income from Assets		
Savings, checking accounts	Letter from institution	Passbook, most current statements
CDs, bonds, etc.	Letter from institution	Tax return, information brochure from institution, the CD, the bond
Stocks	Letter from broker or holding company	Stock or most current statement, price in newspaper or through Internet
Real Property	Letter from tax office, assessment, etc.	Property tax statement (for current value), assessment, records or income and expenses, tax return
Personal property	Assessment, bluebook, etc	Receipt for purchase, other evidence of worth
Cash value of life insurance policies	Letter from insurance company	Current statement
Assets disposed of for less than fair market value	N/A	Original receipt and receipt at disposition, other evidence of worth
Income		
Earned income	EIV print out, letter from employer	Multiple pay stubs
Self-employed	N/A	Tax return from prior year, books of accounts
Regular gifts and contributions	Letter from source, letter from organization receiving gift (i.e., if grandmother pays day care provider, the day care provider could so state)	Bank deposits, other similar evidence

Verification Requirements for Individual Items		
Item to Be Verified	**3rd Party Verification**	**Hand-Carried Verification**
Alimony/child support	Court order, letter from source, letter from Human Services	Record of deposits, divorce decree
Periodic payments (i.e., social security, welfare, pensions, worker's compensation, unemployment)	EIV print out, letter or electronic reports from the source	Award letter, letter announcing change in amount of future payments
Training program participation	Letter from program provider indicating • whether enrolled or completed • whether training is HUD-funded • whether Federal, State, local govt., or local program • whether it is employment training • whether it has clearly defined goals and objectives • whether program has supportive services • whether payments are for out-of-pocket expenses incurred in order to participate in a program • date of first job after program completion	N/A Evidence of job start

12.3 VERIFICATION OF CITIZENSHIP OR ELIGIBLE NON-CITIZEN STATUS

The citizenship/eligible non-citizen status of each family member regardless of age must be determined.

Prior to being admitted, or at the first re-examination, all citizens and nationals will be required to sign a citizen declaration under penalty of perjury. They will be required to show proof of their status by such means as a Social Security card, birth certificate, military ID, or military DD 214 Form.

Prior to being admitted or at the first re-examination, all eligible non-citizens who are 62 years of age or older will be required to sign a citizen declaration under penalty of

perjury. They will also be required to show proof of age.

Prior to being admitted or at the first re-examination, all eligible non-citizens must sign a citizen declaration of their status and a verification consent form and provide their original INS documentation. The Grand Rapids Housing Commission will make a copy of the individual's INS documentation and place the copy in the file. The Grand Rapids Housing Commission will also verify their status through the INS SAVE system. If the INS SAVE system cannot confirm eligibility, the Grand Rapids Housing Commission will mail information to the INS in order that a manual check can be made of INS records.

Family members who do not claim to be citizens, nationals, or eligible non-citizens must be listed on a statement of non-eligible members and the list must be signed by the head of the household.

Non-citizen students on student visas, though in the country legally, are not eligible to be admitted to public housing.

Any family member who does not choose to declare their status must be listed on the statement of non-eligible members.

If no family member is determined to be eligible under this section, the family's eligibility will be denied.

The family's assistance will not be denied, delayed, reduced, or terminated because of a delay in the process of determining eligible status under this section, except to the extent that the delay is caused by the family.

If the Grand Rapids Housing Commission determines that a family member has knowingly permitted an ineligible non-citizen (other than any ineligible non-citizens listed on the lease) to permanently reside in their unit, the family will be evicted. Such family will not be eligible to be readmitted for a period of 24 months from the date of eviction or termination.

12.4 VERIFICATION OF SOCIAL SECURITY NUMBERS

Prior to admission, each family member is required to disclose and provide verification of their assigned Social Security number. New family members must provide this verification prior to being added to the lease.

When a participant requests to add a new household member who is under the age of six (6) and does not have an assigned Social Security number, the participant must disclose the assigned Social Security number and provide the Grand Rapids Housing Commission with the documentation within 90 calendar days of the child being added to the household.

If the family is unable to disclose and provide evidence of the Social Security number within 90 calendar days, the Grand Rapids Housing Commission will grant the family an additional 90-day period to comply with the Social Security number disclosure and documentation requirement, if the Grand Rapids Housing Commission determines that the family was unable to comply with the requirements due to circumstances that could not have reasonably been foreseen and were outside the control of the family (i.e., delayed processing of the Social Security number application by the Social Security Administration, natural disaster, fire, death in family, etc.).

The child will be included as part of the assisted household and entitled to all the benefits of being a household member during the allotted time for the family to comply with the Social Security number disclosure and documentation requirements. Upon expiration of the provided time period, if the family has not complied with the Social Security number disclosure and documentation requirements, the Grand Rapids Housing Commission will terminate the family's tenancy.

Acceptable means of documentation to verify the Social Security number is the original Social Security card. If the card is not available, the Grand Rapids Housing Commission will accept an original Social Security Administration-issued document, which contains the name and Social Security number of the individual or an original document issued by a federal, state, or local government agency, which contains the name and Social Security number of the individual.

Should it come to the attention of the Grand Rapids Housing Commission that the Social Security number provided by the tenant be incorrect and the family is otherwise eligible for continued tenancy in the program, the Grand Rapids Housing Commission will advise the family in writing and request that the correctly assigned Social Security number and documentation be forwarded. This notice shall also provide the family with 90 days in which to comply with the Social Security number disclosure and documentation requirement. This 90-day period will be granted to the tenant to comply with the Social Security number disclosure and documentation requirements, if the Housing Commission determines:

1. The failure to meet the Social Security number disclosure and documentation requirements was due to circumstances that could not have been foreseen and were outside the control of the family; and
2. There is a reasonable likelihood that the family will be able to disclose the Social Security number and provide such documentation of the Social Security number by the deadline.

If the tenant is unable to comply with the requirements by the deadline, the Grand Rapids Housing Commission must terminate the tenancy of the entire family.

12.5 TIMING OF VERIFICATION

Verification information must be dated within ninety (90) days of certification or re-examination. If the verification is older than this, the source will be contacted and asked to provide information regarding any changes.

When an interim re-examination is conducted, the Housing Commission will only verify and update those elements reported to have changed.

12.6 FREQUENCY OF OBTAINING VERIFICATION

For each family member, citizenship/eligible non-citizen status will be verified only once. This verification will be obtained prior to admission. If the status of any family member was not determined prior to admission, verification of their status will be obtained at the next regular re-examination. Prior to a new member joining the family, their citizenship/eligible non-citizen status will be verified.

For each family member, verification of Social Security number will be obtained only once. This verification will be accomplished prior to admission.

13.0 DETERMINATION OF TOTAL TENANT PAYMENT AND RENT

13.1 FORMULA RENT

The Total Tenant Payment is equal to the highest of:

A. 10% of monthly income; or

B. 30% of adjusted monthly income.

The family will pay the greater of the Total Tenant Payment or the minimum rent of $50.00, but never more than the MSHDA LIHTC rent.

13.2 MINIMUM RENT

The Grand Rapids Housing Commission has set the minimum rent at $50.00. However, if the family requests a hardship exemption, the Grand Rapids Housing Commission will immediately suspend the minimum rent for the family until the Housing Commission can determine whether the hardship exists and whether the hardship is of a temporary or long-term nature.

A. <u>A hardship exists in the following circumstances</u>:

1. When the family has lost eligibility for or is waiting an eligibility determination for a Federal, State, or local assistance program;

2. When the family would be evicted as a result of the imposition of the minimum rent requirement;

3. When the income of the family has decreased because of changed circumstances, including loss of employment;

4. When the family has an increase in expenses because of changed circumstances, for medical costs, childcare, transportation, education, or similar items;

5. When a death has occurred in the family.

B. No hardship. If the Housing Commission determines there is no qualifying hardship, the minimum rent will be reinstated, including requiring back payment of minimum rent for the time of suspension.

C. Temporary hardship. If the Housing Commission reasonably determines that there is a qualifying hardship but that it is of a temporary nature, the minimum rent will be not be imposed for a period of 90 days from the date of the family's request. At the end of the 90-day period, the minimum rent will be imposed retroactively to the time of suspension. The Housing Commission will offer a repayment agreement in accordance with the Section 19 of this policy for any rent not paid during the period of suspension. During the suspension period the Housing Commission will not evict the family for nonpayment of the amount of tenant rent owed for the suspension period.

D. Long-term hardship. If the Housing Commission determines there is a long-term hardship, the family will be exempt from the minimum rent requirement until the hardship no longer exists.

E. Appeals. The family may use the grievance procedure to appeal the Housing Commission's determination regarding the hardship. No escrow deposit will be required in order to access the grievance procedure.

13.3 RENT FOR FAMILIES UNDER THE NON-CITIZEN RULE

A mixed family will receive full continuation of assistance if all of the following conditions are met:

A. The family was receiving assistance on June 19, 1995;

B. The family was granted continuation of assistance before November 29, 1996;

C. The family's head of household or spouse has eligible immigration status; and

D. The family does not include any person who does not have eligible status other than the head of household, the spouse of the head of household, any parent of the head of household or spouse, or any child (under the age of 18) of the head of household or spouse.

If a mixed family qualifies for prorated assistance but decides not to accept it, or if the family has no eligible members, the family may be eligible for temporary deferral of termination of assistance to permit the family additional time for the orderly transition of some or all of its members to locate other affordable housing. Under this provision, the family receives full assistance. If assistance is granted under this provision prior to November 29, 1996, it may last no longer than three (3) years. If granted after that date, the maximum period of time for assistance under the provision is eighteen (18) months. The Grand Rapids Housing Commission will grant each family a period of six (6) months to find suitable affordable housing. If the family cannot find suitable affordable housing, the Grand Rapids Housing Commission will provide additional search periods up to the maximum time allowable.

Suitable housing means housing that is not substandard and is of appropriate size for the family. Affordable housing means that it can be rented for an amount not exceeding the amount the family pays for rent, plus utilities, plus 25%.

The family's assistance is prorated in the following manner:

A. Determine the 95th percentile of gross rents (tenant rent plus utility allowance) for the Grand Rapids Housing Commission. The 95th percentile is called the maximum rent.

B. Subtract the family's Total Tenant Payment from the maximum rent. The resulting number is called the maximum subsidy.

C. Divide the maximum subsidy by the number of family members and multiply the result times the number of eligible family members. This yields the prorated subsidy.

D. Subtract the prorated subsidy from the maximum rent to find the prorated Total Tenant Payment. From this amount subtract the full utility allowance to obtain the prorated tenant rent.

13.4 UTILITY ALLOWANCE

For the Antoine Court Apartments, all utilities are included in the rent. There are no utility surcharges for excess consumption.

13.5 PAYING RENT

Rent and other charges are due and payable on the first day of the month. All rents should be paid at the management office at each site. Reasonable accommodations for this requirement will be made for persons with disabilities. As a convenience to residents, cash payments of up to $15.00 may be received by the management office. Amounts exceeding $15.00 must be made by check or money order.

If the rent is not paid by the fifth of the month, a Notice to Terminate will be issued to the tenant. In addition, a $25.00 late charge will be assessed to the tenant. If rent is paid by a

personal check and the check is returned for insufficient funds, this shall be considered a non-payment of rent and will incur the late charge plus an additional charge as assessed to Grand Rapids Housing Commission by the bank for NSF charges.

14.0 OTHER PAYMENTS UNDER THE LEASE

A. Security Deposit shall be required of all tenants and shall be equal to one month's Total Tenant Payment or that amount which is limited by Michigan Rent Security Deposit Law. This amount shall be due and payable upon signing of the initial lease or in payments as discussed in 10.3.

B. Court and processing costs incurred for purposes of eviction shall be passed on to the tenant.

C. Charges for maintenance costs beyond normal wear and tear shall be charged according to the Housing Commission approved repair schedule.

15.0 RECERTIFICATIONS

At least annually, the Grand Rapids Housing Commission will conduct a recertification of family income and circumstances for formula-based rents. The results of the recertification determines: 1) the rent the family will pay, and 2) whether the family is housed in the correct unit size.

15.1 GENERAL

The Grand Rapids Housing Commission will send a notification letter to the family letting them know that it is time for their annual recertification and scheduling an appointment for the recertification interview. The letter also includes forms for the family to complete in preparation for the interview. The letter includes instructions permitting the family to reschedule the interview, if necessary. The letter tells families who may need to make alternate arrangements due to a disability that they may contact staff to request an accommodation of their needs.

15.2 MISSED APPOINTMENTS

If the family fails to respond to the letter and fails to attend the interview, a second letter will be mailed. The second letter will advise of a new time and date for the interview, allowing for the same considerations for rescheduling and accommodation as above. The letter will also advise that failure by the family to attend the second scheduled interview will result in the Grand Rapids Housing Commission taking eviction actions against the family.

15.3 THE FORMULA METHOD

During the recertification interview, the family will provide all information regarding income, assets, expenses, and other information necessary to determine the family's share of rent. The family will sign the HUD consent form and other consent forms that later

will be mailed to the sources that will verify the family circumstances.

Upon receipt of verification, the Grand Rapids Housing Commission will determine the family's annual income and will calculate their rent as follows:

The total tenant payment is equal to the highest of:

A. 10% of monthly income; or

B. 30% of adjusted monthly income.

The family will pay the greater of the total tenant payment or the minimum rent of $50.00, but never more than the MSHDA LIHTC rent.

15.4 EFFECTIVE DATE OF RENT CHARNGES FOR ANNUAL RECERTIFICATIONS

The new rent will generally be effective upon the anniversary date of the original lease date with thirty (30) days written notice of any rent increase to the family.

If the rent determination is delayed due to a reason beyond the control of the family, then any rent increase will be effective the first of the month after the month in which the family receives a 30-day notice of the new rent amount. If the new rent is a reduction and the delay is beyond the control of the family, the reduction will be effective as scheduled on the anniversary of the original lease date.

If the family caused the delay in rent determination, then any increase will be effective on the anniversary date of the original lease date. Any reduction will be effective the first of the month after the rent amount is determined.

15.5 INTERIM RECERTIFICATIONS

During an Interim Recertification, only the information affected by the changes being reported will be reviewed and verified.

Families are required to report the following changes to the Grand Rapids Housing Commission between Annual Recertifications. These changes will trigger an Interim Recertification. The family shall report these changes within ten (10) days of their occurrence:

A. A member has been added to the family through birth, adoption, or court-awarded custody.

B. A household member is leaving or has left the family unit.

C. Any increase in income or decreases in allowable expenses.

In order to add a household member other than through birth or adoption (including a live-in aide), the family must request that the new member be added to the lease. Before

adding the new member to the lease, the individual must complete an application form stating their income, assets, and all other information required of an applicant. The individual must provide their Social Security number, if they have one, and must verify their citizenship/eligible immigrant status. (Their housing will not be delayed due to delays in verifying eligible immigrant status other than delays caused by the family.) The new family member will go through the screening process similar to the process for applicants. The Grand Rapids Housing Commission will determine the eligibility of the individual before adding them to the lease. If the individual is found to be ineligible or does not pass the screening criteria, they will be advised in writing and given the opportunity for an informal review. If they are found to be eligible and do pass the screening criteria, their name will be added to the lease. At the same time, the family's annual income will be recalculated taking into account the circumstances of the new family member. The effective date of the new rent will be in accordance with paragraph 15.7.

Families are not required to, but may at any time, request an interim recertification based on a decrease in income, an increase in allowable expenses, or other changes in family circumstances. Upon such request, the Grand Rapids Housing Commission will take timely action to process the interim recertification and recalculate the tenant's rent.

15.6 SPECIAL RERECERTIFICATIONS

If a family's income is too unstable to project for twelve (12) months, including families that temporarily have no income (zero renters) or have a temporary decrease in income, the Grand Rapids Housing Commission may schedule special recertifications every ninety (90) days until the income stabilizes and an annual income can be determined.

15.7 EFFECTIVE DATE OF RENT CHANGES DUE TO INTERIM OR SPECIAL RECERTIFICATIONS

Unless there is a delay in recertification processing caused by the family, any rent increase will be effective the first of the second month after the month in which the family receives notice of the new rent amount. If the family causes a delay, then the rent increase will be effective on the date it would have been effective had the process not been delayed (even if this involves a retroactive increase).

If the new rent is a reduction and any delay is beyond the control of the family, the reduction will be effective the first of the month after the interim recertification should have been completed.

If the new rent is a reduction and the family caused the delay or did not report the change in a timely manner, the change will be effective the first of the month after the rent amount is determined.

16.0 UNIT TRANSFERS

16.1 OBJECTIVES OF THE TRANSFER POLICY

The objectives of the Transfer Policy include the following:

A. To address emergency situations.

B. To fully utilize available housing resources while avoiding overcrowding by insuring that each family occupies the appropriate size unit.

C. To facilitate relocation when required for modernization or other management purposes.

D. To facilitate relocation of families with inadequate housing accommodations caused by changes in family composition family size, or other medical reasons certified by a doctor.

E. To provide an incentive for families to assist in meeting the Grand Rapids Housing Commission's deconcentration goal.

F. To eliminate vacancy loss and other expense due to unnecessary transfers.

16.2 CATEGORIES OF TRANSFERS

Category 1: Emergency Transfers. These transfers are necessary when conditions pose an immediate threat to the life, health, or safety of a family or one of its members. Such situations may involve defects of the unit or the building in which it is located, the health condition of a family member, a hate crime, the safety of witnesses to a crime, or a law enforcement matter particular to the neighborhood.
Category 2: Immediate Administrative Transfers. These transfers are necessary in order to permit a family needing accessible features to move to a unit with such a feature or to enable modernization work to proceed.

Category 3: Regular Administrative Transfers. These transfers are made to offer incentives to families willing to help meet certain Grand Rapids Housing Commission occupancy goals, to correct occupancy standards where the unit size is inappropriate for the size and composition of the family, to allow for non-emergency, but medically advisable transfers, and other transfers approved by the Grand Rapids Housing Commission when a transfer is the only or best way of solving a serious problem.

16.3 DOCUMENTATION

When the transfer is at the request of the family, the family may be required to provide third-party verification of the need for the transfer.

16.4 PROCESSING TRANSFERS

Transfers on the waiting list will be sorted by the categories as found in Section 16.2 and within each category by date and time.

Transfers in *Category 1* and *2* will be housed ahead of any other families, including those on the applicant waiting list. Transfers in *Category 1* will be housed ahead of transfers in C*ategory 2*.

Transfers in *Category 3* will be housed along with applicants for admission at a ratio of one (1) transfer for every seven (7) admissions.

Upon offer and acceptance of a unit, the family will execute all lease up documents and pay any rent and/or security deposit within two (2) days of being informed the unit is ready to rent. The family will be allowed seven (7) days to complete a transfer. The family will be responsible for paying rent at the old unit as well as the new unit for any period of time they have possession of both. The prorated rent and other charges must be paid at the time of lease execution.

The following is the policy for the rejection of an offer to transfer:

A. If the family rejects with good cause any unit offered, they will not lose their place on the transfer waiting list.

B. If the transfer is being made at the request of the Grand Rapids Housing Commission and the family rejects two offers without good cause, the Grand Rapids Housing Commission will take action to terminate their tenancy. If the reason for the transfer is that the current unit is too small to meet the Grand Rapids Housing Commission's optimum occupancy standards, the family may request in writing to stay in the unit without being transferred so long as their occupancy will not exceed two (2) people per living/sleeping room.

C. If the transfer is being made at the family's request, the family may, without good cause and without penalty, turn down one offer. After turning down a second such offer without good cause, the family's name will be removed from the transfer list.

16.5 COST OF THE FAMILY'S MOVE

The cost of the transfer generally will be borne by the family in the following circumstances:

A. When the transfer is made at the request of the family or by others on behalf of the family (i.e. by the police);

B. When the transfer is necessitated because a family with disabilities needs the accessible unit into which the transferring family moved (The family without disabilities signed a statement to this effect prior to accepting the accessible unit); or

C. When the transfer is needed because action or inaction by the family caused the unit to be unsafe or uninhabitable.

The cost of the transfer will be borne by the Grand Rapids Housing Commission in the following circumstances:

A. When the transfer is needed in order to carry out rehabilitation activities; or

B. When action or inaction by the Grand Rapids Housing Commission has caused the unit to be unsafe or uninhabitable.

The responsibility for moving costs in other circumstances will be determined on a case by case basis.

16.6 TENANTS IN GOOD STANDING

When the transfer is at the request of the family, it will not be approved unless the family is in good standing with the Grand Rapids Housing Commission. This means the family must be in compliance with their lease, current in all payments to the Housing Commission, **must pass a housekeeping inspection, and be free of pest and/or vermin for at least 90 days and is reasonably expected to remain pest free.**

16.7 TRANSFER REQUESTS

A tenant may request a transfer at any time by completing a Transfer Request Form. In considering the request, the Grand Rapids Housing Commission may request a meeting with the tenant to better understand the need for transfer and to explore possible alternatives. The Grand Rapids Housing Commission will review the request in a timely manner and if a meeting is desired, it shall contact the tenant within ten (10) business days of receipt of the request to schedule a meeting.

The Grand Rapids Housing Commission will grant or deny the transfer request in writing within ten (10) business days of receiving the request or holding the meeting, whichever is the later.

If the transfer is approved, the family's name will be added to the transfer waiting list.

If the transfer is denied, a denial letter will be sent and advise the family of their right to utilize the Grievance Procedure.

16.8 RIGHT OF THE GRAND RAPIDS HOUSING COMMISSION IN ADMINISTRATION OF TRANSFER POLICY

The provisions listed above are to be used as a guide to insure fair and impartial means of assigning units for transfers. It is not intended that this policy will create a property right or any other type of right for a tenant to transfer or refuse to transfer.

17.0 INSPECTIONS

An authorized representative of the Grand Rapids Housing Commission and an adult family member will inspect the premises prior to commencement of occupancy. A written Statement of Condition of the premises will be made and all appliances to be provided. The Statement will be signed by both parties with a copy retained in the Grand Rapids Housing Commission file and a copy given to the family member. An authorized Grand Rapids Housing Commission representative will inspect the premises at the time the resident vacates and will furnish a Statement of any charges to be made provided the resident turns in the proper notice under State law. The resident's security deposit can be used to offset against any tenant damages to the unit.

17.1 MOVE-IN INSPECTIONS

The Grand Rapids Housing Commission and an adult member of the family will inspect the unit prior to signing the lease. Both parties will sign a written statement of the condition of the unit. A copy of the signed inspection will be given to the family and the original will be placed in the tenant file.

17.2 ANNUAL INSPECTIONS

The Grand Rapids Housing Commission will inspect each housing unit annually to ensure that each unit meets the Grand Rapids Housing Commission's housing standards. Work orders will be submitted and completed to correct any deficiencies.

17.3 PREVENTATIVE MAINTENANCE INSPECTIONS

This is generally conducted along with the annual inspection. This inspection is intended to keep items in good repair. It checks weatherization; checks the condition of the smoke detectors, stoves, refrigerators, water heaters, furnaces, automatic thermostats and water temperatures; checks for plumbing leaks; provides an opportunity to change furnace filters and other minor servicing that extends the life of the unit and its appliances and fixtures.

17.4 SPECIAL INSPECTIONS

Special inspections may be scheduled to enable HUD or others, such as a local authority, to inspect a sample of the housing stock maintained by the Grand Rapids Housing Commission.

17.5 HOUSEKEEPING INSPECTIONS

Generally, at the time of the Annual Inspection, or at other times as necessary, the Grand Rapids Housing Commission will conduct a Housekeeping Inspection to ensure the family is maintaining the unit in a safe and sanitary condition.

17.6 NOTICE OF INSPECTION

For inspections defined as Annual Inspections, Preventative Maintenance Inspections, Special Inspections, and Housekeeping Inspections, the Grand Rapids Housing Commission will give the tenant at least two (2) days written notice.

17.7 EMERGENCY INSPECTIONS

If any employee and/or agent of the Grand Rapids Housing Commission has reason to believe that an emergency exists within the housing unit, the unit can be entered without notice. The person(s) that enters the unit will leave a written notice to the resident that indicates the date and time the unit was entered and the reason why it was necessary to enter the unit.

17.8 PRE-MOVE-OUT INSPECTIONS

When a tenant gives notice that they intend to move, the Grand Rapids Housing Commission will offer to schedule a Pre-move-out Inspection with the family. The inspection allows the Grand Rapids Housing Commission to help the family identify any problems which, if left uncorrected, could lead to vacate/damage charges. This inspection is a courtesy to the family and has been found to be helpful both in reducing costs to the family and in enabling the Grand Rapids Housing Commission to ready units more quickly for the future occupants.

17.9 MOVE-OUT INSPECTIONS

The Grand Rapids Housing Commission conducts the Move-out Inspection after the tenant vacates to assess the condition of the unit and determine responsibility for any needed repairs/damages. When possible, the tenant is notified of the inspection and is encouraged to be present. This inspection becomes the basis for any claims that may be assessed against the security deposit.

18.0 PET POLICY

18.1 EXCLUSIONS

This policy does not apply to animals that are used to assist persons with disabilities. Assistance animals are allowed in all housing facilities with no restrictions other than those imposed on all tenants to maintain their units and associated facilities in a decent, safe, and sanitary manner and to refrain from disturbing their neighbors.

18.2 APPROVAL

Residents must have the prior approval of the Grand Rapids Housing Commission before moving a pet into their unit. Residents must request approval on the Authorization for Pet Ownership Form that must be fully completed before the Housing Commission will approve the request. Residents must comply with the established Pet Policy of the Grand Rapids Housing Commission.

18.3 TYPES AND NUMBER OF PETS

The Grand Rapids Housing Commission will allow only domesticated dogs, cats, birds, and fish in aquariums in units. All dogs and cats must be spayed or neutered.

Only one (1) pet per unit is allowed.

Any animal deemed to be potentially harmful to the health or safety of others, including attack or fight trained dogs, will not be allowed.

No animal may exceed 20 pounds in weight.

18.4 INNOCULATIONS

In order to be registered, pets must be appropriately inoculated against rabies and other conditions prescribed by local ordinances. Proof will be required annually at the time of annual recertification.

18.5 PET DEPOSIT

A pet deposit of up to $300.00 or that amount which is limited by the Michigan Rent Security Deposit Law is required at the time of registering a pet. The deposit is refundable when the pet or the family vacates the unit, less any amounts owed due to damage beyond normal wear and tear.

18.6 FINANCIAL OBLIGATIONS OF RESIDENTS

Any resident who owns or keeps a pet in their dwelling unit will be required to pay for any damages caused by the pet. Also, any pet-related insect infestation in the pet owner's unit will be the financial responsibility of the pet owner and the Grand Rapids Housing Commission reserves the right to exterminate and charge the resident.

18.7 NUISANCE OR THREAT TO HEALTH OR SAFETY

The pet and its living quarters must be maintained in a manner to prevent odors and any other unsanitary conditions in the owner's unit and surrounding areas.

Repeated substantiated complaints by neighbors or Grand Rapids Housing Commission personnel regarding pets disturbing the peace of neighbors through noise, odor, animal waste, or other nuisances will result in the owner having to remove the pet or move him/herself.

18.8 DESIGNATION OF PET AREAS

Pets must be kept in the owner's apartment or on a leash at all times when outside (no outdoor cages may be constructed). Pets will be allowed only in designated areas on the grounds of the project. Pet owners must clean up after their pets and are responsible for

disposing of pet waste. Pet owners must comply with the terms and conditions of a separate posted Pet Policy of the Grand Rapids Housing Commission.

18.9 REMOVAL OF PETS

The Grand Rapids Housing Commission, or an appropriate community authority, shall require the removal of any pet from a project if the pet's conduct or condition is determined to be a nuisance or threat to the health or safety of other occupants of the project or of other persons in the community where the project is located.

19.0 REPAYMENT AGREEMENTS

When a resident owes the Grand Rapids Housing Commission back charges and is unable to pay the balance by the due date, the resident may request that the Grand Rapids Housing Commission allow them to enter into a Repayment Agreement. The Grand Rapids Housing Commission has the sole discretion of whether to accept such an agreement. All Repayment Agreements must be in writing and signed by both parties. Failure to comply with the Repayment Agreement terms may subject the resident to eviction procedures.

20.0 TERMINATION

20.1 TERMINATION OF TENANCY BY THE TENANT

The tenant may terminate the lease at any time upon submitting a 30-day written notice. If the tenant vacates prior to the end of the thirty (30) days, they will be responsible for rent through the end of the notice period or until the unit is re-rented, whichever occurs first.

20.2 TERMINATION OF TENANCY BY THE HOUSING COMMISSION

The Grand Rapids Housing Commission will terminate the lease for serious or repeated violations of material lease terms. Such violations include, but are not limited to the following:

A. Nonpayment of rent or other charges.

B. A history of late rental payments.

C. Failure to provide timely and accurate information regarding family composition, income circumstances, or other information related to eligibility or rent.

D. Failure to allow inspection of the unit.

E. Failure to maintain the unit in a safe and sanitary manner.

F. Assignment or subletting of the premises.

G. Use of the premises for purposes other than as a dwelling unit (other than for Housing Commission approved resident businesses).

H. Destruction of property.

I. Acts of destruction, defacement, or removal of any part of the premises or failure to cause guests to refrain from such acts.

J. Any criminal activity on or near the property or drug-related criminal activity on or off the premises. This includes, but is not limited to, the manufacture of methamphetamine on the premises of the Grand Rapids Housing Commission.

K. Non-compliance with Non-Citizen Rule requirements.

L. Permitting persons not on the lease to reside in the unit more than fourteen (14) days each year without the prior written approval of the Housing Commission.

M. If a tenant is a fugitive, felon or parole violator.

N. If a tenant's abuse of alcohol or other legal substances threatens the health, safety, or right to peaceful enjoyment of the premises by other residents.

O. Harassment, intimidation, or acts of physical violence against other residents, resident's guests, Housing Commission personnel or its representatives.

P. Other good cause.

The Grand Rapids Housing Commission will take immediate action to evict any household that includes an individual who is subject to a lifetime registration requirement under a State sex offender registration program.

20.3 EVICTION DIVERSION PLAN

Upon issuance of a Notice of Termination of Tenancy by the Grand Rapids Housing Commission, Resident Services staff will conduct an evaluation to determine if an Eviction Prevention Plan (EPP) is appropriate. If determined appropriate, an EPP will be drafted and executed between the Housing Commission and the tenant. The EPP is a proactive document that provides a range of strategies that may assist tenants avoid eviction and remain housed.

The Grand Rapids Housing Commission recognizes the roles that tenants must play in preventing eviction and will invite and encourage their participation in the eviction prevention process.

20.4 ABANDONMENT

The Grand Rapids Housing Commission will consider a unit to be abandoned when a resident has both fallen behind in rent **AND** has clearly indicated by words or actions an intention not to continue living in the unit.

When a unit has been abandoned, a Grand Rapids Housing Commission representative may enter the unit and remove any abandoned property. It will be stored in a reasonably secure place. A Notice of Abandonment will be mailed to the resident stating where the property is being stored and how long until disposal of said property. If the Grand Rapids Housing Commission does not have a new address for the resident, the Notice will be mailed to the abandoned unit address so it can be forwarded by the post office.

If the total value of the property is estimated at less than $500, the Grand Rapids Housing Commission will mail a Notice of the sale or disposition to the resident and then wait 30 days. Family pictures, keepsakes, and personal papers cannot be sold or disposed of until 30 days after the Grand Rapids Housing Commission mails the Notice of Abandonment.

If the estimated value of the property is more than $500, the Grand Rapids Housing Commission will mail a notice of the sale or disposition to the resident and then wait 30 days before sale or disposition. Personal papers, family pictures, and keepsakes can be sold or disposed of at the same time as other property.

Any proceeds raised by the sale of the property is retained by the Housing Commission to cover amounts owed by the family to the Grand Rapids Housing Commission such as back rent and the cost of storing and selling the property. If there are any proceeds left over and the family's forwarding address is known, the Grand Rapids Housing Commission will mail it to the family. If the family's address is not known, the Grand Rapids Housing Commission will hold it for the former resident for one (1) year. If it is not claimed within that time, funds will revert to the Grand Rapids Housing Commission.

When learning of an abandoned unit, the Grand Rapids Housing Commission will either return the deposit or provide a statement of why the deposit is being kept in accordance with State law.

20.5 RETURN OF SECURITY DEPOSIT

After a family moves out, the Grand Rapids Housing Commission will return the security deposit within the time frame established by State law or give the family a written statement of why all or part of the security deposit is being kept. The rental unit must be restored to the same condition as when the family moved in, except for normal wear and tear. Deposits will not be used to cover normal wear and tear or damage that existed when the family moved in.

If State law requires the payment of interest on security deposits, it shall be complied with.

The Grand Rapids Housing Commission will be considered in compliance with the above if the required payment, statement, or both, are deposited in the U.S. mail with first class postage paid within the time frame established by State law.

ATTACHMENT F

GRAND RAPIDS HOUSING COMMISSION - Proposed Budget - Fiscal Year Ending 6/30/22

	Adams	Hope	Hope Support	Leonard	Mt Mercy I	Ransom	Scattered LIPH	Scattered RAD	Scattered H.O.	Vouchers Admin	Vouchers HAP
Revenues:											
Management and Bookkeeping Fees	-	-	-	-	-	-	-			-	-
HUD Grants	516,322	-	159,663	-	-	960,000	94,702	-	-	-	23,921,330
Vacancies	(15,000)	(4,000)	-	(5,000)	(9,000)	(4,000)	(600)	-	-	-	-
Tenant Assistance Payment	-	170,000	-	840,000	572,000	-	-	80,000	-	-	-
Administrative Fee	-	-	-	-	-	-	-	-	-	2,033,522	-
Dwelling Rental	500,000	46,000	-	433,670	425,000	525,000	46,000	89,680	-	-	-
Excess Utilities	2,250	-	-	1,900	-	-	-	-	-	-	-
Investment income-Residual Rec	-	-	-	-	-	-	-	-	-	-	
Investment Income-Repl Reserve	-	-	-	-	-	-	-	-	-	-	
Fraud Recovery Funds	-	-	-	-	-	-	-	-	-	30,000	30,000
FSS Escrow Forfeitures	-	-	-	-	-	-	-	-	-	-	150,000
Other Income	20,000	10,000	-	4,000	3,500	3,500	1,700	1,500	70,000	-	-
Laundry Receipts	10,000	-	-	5,000	9,000	10,500	-	-	-	-	-
Vending Income	-	-	-	-	500	-	-	-	-	-	-
Interest on General Funds	-	-	-	-	-	25	-	-	1,500	-	-
Total Revenues	1,033,572	222,000	159,663	1,279,570	1,001,000	1,495,025	141,802	171,180	71,500	2,063,522	24,101,330
Expenses:											
Administrative:											
Salaries	116,962	11,491	-	72,704	72,635	109,393	15,880	7,264	-	763,747	-
Compensated Absences	-	-	-	-	-	-	-	-	-	-	-
Legal Fees	-	2,000	-	1,500	1,000	2,000	-	850	-	10,000	-
Training	1,500	1,000	-	900	800	2,500	100	200	-	10,000	-
Travel	500	600	-	1,000	500	1,000	250	500	-	10,000	-
Auditing Fees	1,500	1,000	-	1,300	1,000	18,000	175	500	-	35,000	-
Employee Benefits	54,879	5,367	-	31,002	32,240	52,536	7,124	2,742	-	341,643	-
Office Supplies	2,000	1,000	-	3,000	1,500	3,300	200	400	-	10,000	-
Telephone Charges	7,750	4,600	-	5,000	8,000	9,200	250	200	-	10,000	-
Advertising	-	-	-	-	-	100	-	-	-	-	-
Eviction/Collection Costs	22,000	9,000	-	4,000	2,500	2,000	3,400	2,000	-	-	-
Copy Machine	500	400	-	350	400	1,000	-	-	-	2,500	-
Portable Admin Fee	-	-	-	-	-	-	-	-	-	13,800	-
Rent Free Unit	-	-	-	-	-	11,000	-	-	-	-	-
Postage	1,500	300	-	1,100	1,000	1,500	150	200	-	20,000	-

GRAND RAPIDS HOUSING COMMISSION - Proposed Budget - Fiscal Year Ending 6/30/22

	Adams	Hope	Hope Support	Leonard	Mt Mercy I	Ransom	Scattered LIPH	Scattered RAD	Scattered H.O.	Vouchers Admin	Vouchers HAP
Other Sundry	11,000	7,000	-	13,000	9,000	15,000	2,500	2,000	500	20,000	-
Management Fee	118,000	-	-	64,500	51,750	76,104	9,675	13,213	-	488,124	-
Asset Management Fee	-	-	-	-	-	-	-	-	-	-	-
Bookkeeping Fee	16,500	-	-	-	-	-	1,350	-	-	305,078	-
Total Administrative	354,591	43,758	-	199,356	182,325	304,633	41,054	30,069	500	2,039,892	-
Tenant Services:											
Tenant Services - Salaries	49,073	-	95,370	48,282	44,649	49,073	-	-	-	-	-
Tenant Services- Benefits	25,522	-	50,126	25,399	19,476	25,522	-	-	-	-	-
Tenant Services-Other	2,500	150	13,967	1,500	1,500	2,000	-	300	-	-	-
Total Tenant Services	77,095	150	159,463	75,181	65,625	76,595	-	300	-	-	-
Utilities:											
Water	44,000	15,000		37,000	22,000	15,000	12,000	15,000	1,500	1,500	-
Electricity	106,000	23,000		75,000	87,000	110,000	15,000	1,000	750	-	-
Gas	43,000	13,000		44,800	60,000	85,000	1,600	500	1,000	1,500	-
Total Utilities	193,000	51,000	-	156,800	169,000	210,000	28,600	16,500	3,250	3,000	-
Maintenance:											
Maintenance Labor	111,040	15,762		72,407	73,766	96,888	10,344	10,344	10,344	-	-
Maintenance Materials	15,500	4,500		22,000	8,000	35,000	2,500	4,000	250	250	-
Cleaning Supplies	5,000	800		4,000	1,500	4,500	200	800	100	-	-
Painting Supplies	4,000	1,600		3,000	2,500	2,800	900	500	-	-	-
Appliances	4,000	2,000		6,900	2,500	10,000	750	1,000	-	-	-
Other Supplies	1,000	3,500		1,000	500	5,000	25	100	-	1,000	-
Exterminating	40,000	2,500		40,000	16,000	18,000	500	3,000	-	-	-
Heating Repairs	15,000	5,500		18,000	15,000	28,000	2,300	3,000	-	1,000	-
Elevator Maintenance	4,500	-		10,000	15,000	10,000	-	-	-	-	-
Lawn Care	6,000	3,100		10,000	12,000	9,000	-	-	200	700	-
Snow Plowing	3,500	1,200		6,000	6,000	10,000	-	-	-	1,000	-
Electrical Repairs	2,000	500		3,000	3,000	9,000	500	2,000	-	-	-
Carpet/Tile Replacement	10,000	13,000		15,000	15,000	50,000	2,000	3,000	-	-	-
Plumbing Repairs	10,000	3,000		25,000	3,000	14,000	500	2,500	500	-	-
Other Contract Costs	26,000	9,825	-	50,000	50,000	60,000	1,000	15,000	-	3,000	-
Janitorial contracts	-	-		-	-	1,000	-	-	-	5,000	-
Trash Removal	14,500	6,100		7,000	6,000	9,000	-	4,000	-	-	-

GRAND RAPIDS HOUSING COMMISSION - Proposed Budget - Fiscal Year Ending 6/30/22

	Adams	Hope	Hope Support	Leonard	Mt Mercy I	Ransom	Scattered LIPH	Scattered RAD	Scattered H.O.	Vouchers Admin	Vouchers HAP
Maintenance Travel	400	200		700	400	600	350	500	150	-	-
Maintenance Benefits	53,061	4,249		36,310	35,273	48,170	5,187	5,187	5,187	-	-
Painting	17,000	6,000		20,000	12,000	20,000	3,000	8,000	-	-	-
Total Maintenance	342,501	83,336	-	350,317	277,439	440,958	30,056	62,931	16,731	11,950	-
General Expenses:											
Insurance	25,000	8,000		26,000	28,000	42,000	8,200	12,000	2,500	-	-
Mortgage Insurance	-	-		-	-	19,500	-	-	-	-	-
Workers Comp. Insurance	1,000	100	200	1,391	1,000	1,500	150	150	50	2,000	-
PILOT	30,925	(500)		27,877	25,600	-	1,740	7,318	-	-	-
Bad Debt-Tenants	8,000	3,000		3,000	1,000	4,000	500	3,000	-	-	-
Interest-Mortgage	-	-		45,612	70,537	156,045	-	-	-	-	-
Housing Assistance	-	-		-	-	-	-	-	-	-	22,940,413
Housing Assistance: HO	-	-		-	-	-	-	-	-	-	169,367
Housing Assistance: NED	-	-		-	-	-	-	-	-	-	705,696
Housing Assistance: Enhanced	-	-		-	-	-	-	-	-	-	105,854
FSS Escrow	1,000	-		-	-	-	-	3,000	-	-	180,000
Depreciation	183,000	36,856		113,700	225,000	52,000	52,000	22,000	9,500	2,800	-
Amortization	-	-		-	-	5,561	-	-	-	-	-
Total General Expenses	248,925	47,956	200	217,580	351,137	280,606	62,590	47,468	12,050	4,800	24,101,330
Total Expenses	**1,216,112**	**226,200**	**159,663**	**999,234**	**1,045,526**	**1,312,792**	**162,300**	**157,268**	**32,531**	**2,059,642**	**24,101,330**
Net Income (Loss)	**(182,540)**	**(4,200)**	**-**	**280,336**	**(44,526)**	**182,233**	**(20,498)**	**13,912**	**38,969**	**3,880**	**-**
Cash flow reconciliation:											
Add: Depreciation expense	183,000	36,856	-	113,700	225,000	57,561	52,000	22,000	9,500	2,800	-
Add: Paid from escrow or reserve							-				
Add: Interest payable to GRHC											
Add: Capital Fund operations	-										
Add: Principal pmts mortgage rec									2,400		
Less: Mortgage principal payments				(153,840)	(86,520)	(110,510)					
Less: Replacement reserve deposits						(55,586)		(20,000)			
Less: Voluntary reserve deposits		-		(9,996)	(9,996)						
Less: Capital items from operations		-									
Net estimated cash flow	**460**	**32,656**	**-**	**230,200**	**83,958**	**73,698**	**31,502**	**15,912**	**50,869**	**6,680**	**-**

GRAND RAPIDS HOU

	Mainstream	Mod Rehab I	Mod Rehab 4	ROSS FSS	Central Office	Elim.	Totals
Revenues:							
Management and Bookkeeping Fees		-	-	-	1,225,381	(1,225,381)	-
HUD Grants	1,722,000	126,720	471,624	360,000	-		28,332,361
Vacancies		-	-	-	-		(37,600)
Tenant Assistance Payment		-	-	-	-	(1,662,000)	-
Administrative Fee	188,210	11,495	61,786	-	-		2,295,012
Dwelling Rental		-	-	-	-		2,065,350
Excess Utilities		-	-	-	-		4,150
Investment income-Residual Rec		-	-	-	-		-
Investment Income-Repl Reserve		-	-	-	-		-
Fraud Recovery Funds		-	-	-	-		60,000
FSS Escrow Forfeitures		-	-	-	-		150,000
Other Income		-	-	-	1,300,000		1,414,200
Laundry Receipts		-	-	-	-		34,500
Vending Income		-	-	-	-		500
Interest on General Funds		-	-	-	-		1,525
Total Revenues	1,910,210	138,215	533,410	360,000	2,894,419	(2,887,381)	34,689,036
Expenses:							
Administrative:							
Salaries	28,899	3,042	16,506	-	1,186,092		2,404,615
Compensated Absences	-	-	-	-	(500)		(500)
Legal Fees	800	-	-	-	10,000		28,150
Training	300	150	250	-	15,000		32,700
Travel	150	80	300	-	1,500		16,380
Auditing Fees	1,000	200	800	-	7,500		67,975
Employee Benefits	13,443	1,457	7,846	-	441,019		991,298
Office Supplies	200	75	500	-	24,000		46,175
Telephone Charges	200	30	200	-	17,500		62,930
Advertising	-	-	-	-	10,000		10,100
Eviction/Collection Costs	-	-	-	-	-		44,900
Copy Machine	25	15	50	-	3,000		8,240
Portable Admin Fee		-	-	-	-		13,800
Rent Free Unit		-	-	-	-		11,000
Postage	800	120	800	-	14,000		41,470

GRAND RAPIDS HOU

		Mainstream	Mod Rehab I	Mod Rehab 4	ROSS FSS	Central Office	Elim.	Totals
	Other Sundry	100	200	1,000	-	50,000		131,300
	Management Fee	35,212	2,304	12,384	-	-	(871,266.16)	-
	Asset Management Fee		-	-	-	-	-	-
	Bookkeeping Fee	22,008	1,440	7,740	-	-	(354,115.20)	-
Total Administrative		103,137	9,113	48,376	-	1,779,111	(1,225,381)	3,910,533
Tenant Services:								
	Tenant Services - Salaries	-	-	-	252,000	36,533		574,980
	Tenant Services- Benefits	-	-	-	108,000	13,744		267,789
	Tenant Services-Other	-	-	-	-	-		21,917
Total Tenant Services		-	-	-	360,000	50,277	-	864,686
Utilities:								
	Water	-	-	-	-	-		163,000
	Electricity	-	-	-	-	-		417,750
	Gas	-	-	-	-	-		250,400
Total Utilities		-	-	-	-	-	-	831,150
Maintenance:								
	Maintenance Labor	-	-	-	-	-		400,895
	Maintenance Materials	-	-	-	-	250		92,250
	Cleaning Supplies	-	-	-	-	100		17,000
	Painting Supplies	-	-	-	-	-		15,300
	Appliances	-	-	-	-	-		27,150
	Other Supplies	80	10	-	-	250		12,465
	Exterminating	-	-	-	-	-		120,000
	Heating Repairs	25	-	-	-	-		87,825
	Elevator Maintenance	-	-	-	-	-		39,500
	Lawn Care	-	-	-	-	350		41,350
	Snow Plowing	20	-	-	-	-		27,720
	Electrical Repairs	-	-	-	-	-		20,000
	Carpet/Tile Replacement	-	-	-	-	-		108,000
	Plumbing Repairs	-	-	-	-	-		58,500
	Other Contract Costs	200	25	-	-	1,000		216,050
	Janitorial contracts	200	35	-	-	-		6,235
	Trash Removal	-	-	-	-	-		46,600

GRAND RAPIDS HOU

	Mainstream	Mod Rehab I	Mod Rehab 4	ROSS FSS	Central Office	Elim.	Totals
Maintenance Travel	-	-	-	-	-		3,300
Maintenance Benefits	-	-	-	-	-		192,624
Painting	-	-	-	-	200		86,200
Total Maintenance	525	70	-	-	2,150	-	1,618,964
General Expenses:							
Insurance	-	-	-	-	-		151,700
Mortgage Insurance	-	-	-	-	-		19,500
Workers Comp. Insurance	100	-	-	-	-		7,641
PILOT	-	-	-	-	-		92,960
Bad Debt-Tenants	-	-	-	-	-		22,500
Interest-Mortgage	-	-	-	-	-		272,194
Housing Assistance	1,722,000	126,720	471,624	-	-	(1,662,000)	23,598,757
Housing Assistance: HO	-	-	-	-	-		169,367
Housing Assistance: NED	-	-	-	-	-		705,696
Housing Assistance: Enhanced	-	-	-	-	-		105,854
FSS Escrow	-	-	-	-	-		184,000
Depreciation	-	12	65	-	11,000		707,933
Amortization		-	-	-	-		5,561
Total General Expenses	1,722,100	126,732	471,689	-	11,000	(1,662,000)	26,044,164
Total Expenses	**1,825,762**	**135,915**	**520,065**	**360,000**	**1,842,538**	**(2,887,381)**	**33,269,497**
Net Income (Loss)	**84,448**	**2,300**	**13,345**	**-**	**1,051,881**	**-**	**1,419,539**
Cash flow reconciliation:							
Add: Depreciation expense	-	12	65	-	11,000		707,933
Add: Paid from escrow or reserve							-
Add: Interest payable to GRHC					(369,038)		
Add: Capital Fund operations							
Add: Principal pmts mortgage rec							2,400
Less: Mortgage principal payments							(350,870)
Less: Replacement reserve deposits							(75,586)
Less: Voluntary reserve deposits							(19,992)
Less: Capital items from operations							-
Net estimated cash flow	**84,448**	**2,312**	**13,410**	**-**	**693,843**	**-**	**1,683,425**

ATTACHMENT G

Housing Choice Voucher Program
Rent Limit and Utility Allowance Chart
2022

All unit types	**0BR**	**1BR**	**2BR**	**3BR**	**4BR**	**5BR**	**6BR**
FMRs	**798**	**859**	**1041**	**1356**	**1538**	**1769**	**1999**

Voucher Payment Standard(VPS)

NEW	**878**	**945**	**1145**	**1492**	**1692**	**1946**	**2199**

Utility Allowance $

Family Name: (S8115)

FMRs: 01/10/2022
VPS (110% of FMRs): 01/10/2022
Utility Allowance: 01/01/2022

FMR/Utility Allowance 2022

Utility Allowance Schedule

See Public Reporting and Instructions on back.

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

OMB Approval
No. 25577-0169
exp.7/31/2022

The following allowances are used to determine the total cost of tenant-furnished utilities and appliances.

Date (01/01/2022):

Locality:
Grand Rapids Housing Commission, MI

Unit Type: **Multi-Family (Apartment/Low-Rise/High-Rise/Row House/Townhouse/Semi-Detached/Duplex)**

Utility or Service:	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
	Monthly Dollar Allowances						
Heating							
a. Natural Gas	$19.00	$23.00	$27.00	$31.00	$34.00	$38.00	$41.00
b. Bottle Gas/Propane							
c. Electric	$32.00	$38.00	$51.00	$64.00	$78.00	$91.00	$99.00
d. Electric Heat Pump	$28.00	$33.00	$39.00	$44.00	$49.00	$54.00	$58.00
e. Oil							
Cooking							
a. Natural Gas	$2.00	$2.00	$4.00	$4.00	$6.00	$7.00	$7.00
b. Bottle Gas/Propane							
c. Electric	$8.00	$9.00	$13.00	$17.00	$21.00	$25.00	$27.00
Other Electric & Cooling							
Other Electric (Lights & Appliances)	$28.00	$34.00	$47.00	$60.00	$73.00	$86.00	$93.00
Air Conditioning	$6.00	$7.00	$9.00	$12.00	$14.00	$17.00	$18.00
Water Heating							
a. Natural Gas	$5.00	$6.00	$9.00	$11.00	$14.00	$17.00	$19.00
b. Bottle Gas/Propane							
c. Electric	$20.00	$23.00	$30.00	$36.00	$43.00	$49.00	$53.00
d. Oil							
Water, Sewer, Trash Collection							
Water	$21.00	$21.00	$26.00	$30.00	$34.00	$38.00	$41.00
Sewer	$37.00	$37.00	$46.00	$54.00	$63.00	$71.00	$76.00
Trash Collection	$21.00	$21.00	$21.00	$21.00	$21.00	$21.00	$21.00
Tenant-supplied Appliances							
Range / Microwave Tenant-supplied	$11.00	$11.00	$11.00	$11.00	$11.00	$11.00	$11.00
Refrigerator Tenant-supplied	$12.00	$12.00	$12.00	$12.00	$12.00	$12.00	$12.00
Other--specify: Monthly Charges							
Electric Charge $9.22	$9.00	$9.00	$9.00	$9.00	$9.00	$9.00	$9.00
Natural Gas Charge $12.21	$12.00	$12.00	$12.00	$12.00	$12.00	$12.00	$12.00

Actual Family Allowances

To be used by the family to compute allowance. *Complete below for the actual unit rented.*

Name of Family

Address of Unit

Number of Bedrooms

Utility or Service	per month cost
Heating	$
Cooking	$
Other Electric	$
Air Conditioning	$
Water Heating	$
Water	$
Sewer	$
Trash Collection	$
Range / Microwave	$
Refrigerator	$
Other	$
Other	$
Total	$

Seal of Certified Compliance® 2021 ResidentLife Utility Allowances

adapted from form HUD-52667 (7/2019)

Utility Allowance Schedule

See Public Reporting and Instructions on back.

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

OMB Approval
No. 25577-0169
exp.7/31/2022

The following allowances are used to determine the total cost of tenant-furished utilities and appliances.

Date (01/01/2022):

Locality:
Grand Rapids Housing Commission, MI

Unit Type: **Single-Family (Detached House)**

Utility or Service:	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
	Monthly Dollar Allowances						
Heating							
a. Natural Gas	$28.00	$33.00	$38.00	$43.00	$49.00	$55.00	$59.00
b. Bottle Gas/Propane							
c. Electric	$75.00	$89.00	$104.00	$119.00	$134.00	$149.00	$161.00
d. Electric Heat Pump	$40.00	$47.00	$56.00	$63.00	$70.00	$77.00	$83.00
e. Oil							
Cooking							
a. Natural Gas	$2.00	$2.00	$4.00	$4.00	$6.00	$7.00	$7.00
b. Bottle Gas/Propane							
c. Electric	$8.00	$9.00	$13.00	$17.00	$21.00	$25.00	$27.00
Other Electric & Cooling							
Other Electric (Lights & Appliances)	$42.00	$49.00	$68.00	$88.00	$107.00	$126.00	$136.00
Air Conditioning	$4.00	$5.00	$11.00	$18.00	$24.00	$31.00	$33.00
Water Heating							
a. Natural Gas	$7.00	$7.00	$11.00	$14.00	$18.00	$21.00	$22.00
b. Bottle Gas/Propane							
c. Electric	$25.00	$29.00	$37.00	$45.00	$53.00	$62.00	$66.00
d. Oil							
Water, Sewer, Trash Collection							
Water	$21.00	$21.00	$26.00	$30.00	$34.00	$38.00	$41.00
Sewer	$37.00	$37.00	$46.00	$54.00	$63.00	$71.00	$76.00
Trash Collection	$21.00	$21.00	$21.00	$21.00	$21.00	$21.00	$21.00
Tenant-supplied Appliances							
Range / Microwave Tenant-supplied	$11.00	$11.00	$11.00	$11.00	$11.00	$11.00	$11.00
Refrigerator Tenant-supplied	$12.00	$12.00	$12.00	$12.00	$12.00	$12.00	$12.00
Other--specify: Monthly Charges							
Electric Charge $9.22	$9.00	$9.00	$9.00	$9.00	$9.00	$9.00	$9.00
Natural Gas Charge $12.21	$12.00	$12.00	$12.00	$12.00	$12.00	$12.00	$12.00

Actual Family Allowances

To be used by the family to compute allowance. *Complete below for the actual unit rented.*

Name of Family

Address of Unit

Number of Bedrooms

Utility or Service	per month cost
Heating	$
Cooking	$
Other Electric	$
Air Conditioning	$
Water Heating	$
Water	$
Sewer	$
Trash Collection	$
Range / Microwave	$
Refrigerator	$
Other	$
Other	$
Total	$

Seal of Certified Compliance® 2021 ResidentLife Utility Allowances

adapted from form HUD-52667
(7/2019)

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

March 3, 2022

Ms. Lindsey Reames
Executive Director
Grand Rapids Housing Commission
1420 Fuller Avenue SE
Grand Rapids, MI 49507

Dear Ms. Reames:

The Department of Housing and Urban Development (HUD) reviewed the Grand Rapids Housing Commission (GRHC) request submitted pursuant to **Notice PIH 2021-34, "Expedited Regulatory Waivers for the Public Housing and Housing Choice Voucher (including Mainstream and Mod Rehab) Programs."** The Notice provided instructions on the expedited processing of public housing authority (PHA) requests to continue to use specific regulatory waivers for the Public Housing and Housing Choice Voucher (HCV) (including Mainstream and Mod Rehab) programs impacted by the COVID-19 pandemic. The waivers you requested are marked "Yes" in column one on the table below.

Background:
The Coronavirus Aid, Relief, and Economic Security (CARES) Act (Public Law 116-136) provided HUD with authority, in the context of the public health emergency, to waive statutes and regulations (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment) for the HCV and Public Housing programs. Most CARES Act waivers and alternative requirements contained in notice PIH 2021-14 (published May 5, 2021) expire on December 31, 2021; specific previously exercised HCV waiver approvals may extend into 2022. Notice PIH 2021-34 provides instruction on expedited waiver processing that would allow for PHAs to continue to use specific CARES Act regulatory waivers for the Public Housing and Housing Choice Voucher (including Mainstream and Mod Rehab) programs. It also provides for an expedited approval process for one new waiver in the Housing Choice Voucher Program related to payment standards that will help facilitate leasing, which was not part of the CARES Act waivers. The regulatory waivers covered under Notice PIH 2021-34 are stated in the chart below.

GRHC's application was submitted by an authorized official and included GRHC's justifications for the waiver(s) to be granted. Notice PIH 2021-34 specifies that good cause justification must include: (a) why a PHA needs the waiver; (b) the impact on PHA operations or applicants if the waiver is not provided; and (c) the proposed waiver duration is limited to only the time necessary for a PHA to resume normal operations and not to exceed December 31, 2022.

Additionally, if requesting a waiver of Regulation 24 CFR § 982.503(b) Voucher Tenancy: New Payment Standard Amount, a PHA must certify that it meets one of the following good cause reasons (explained in further detail in Notice PIH 2021-34): (1) The PHA's jurisdiction is in a Fair Market Rent (FMR) area identified by HUD to have significant rental market fluctuations, where an increase in the PHA's payment standards up to 120 percent of the FMR may help the PHA more quickly respond to local circumstances (a list of these FMR areas is attached to Notice 2021-34); (2) Utilization Rate is lower than 98 percent for the current year-to-date or more than a 5 percent reduction between years 2019 and 2021; or (3) less than 85 percent of the PHA's vouchers issued in the last six months have leased. If your PHA adopts this waiver, please notify ***PIH_Expedited_Waivers@hud.gov*** if it elects to change its payment standards back to the basic range between 90 and 110 percent based on the FY 2022 FMR.

After reviewing the waiver request(s) and considering GRHC's stated justification(s) of good cause, HUD: (1) finds there is good cause to waive, and hereby waives, the regulations and/or requirements marked "APPROVED" in the "Waiver Status" column and/or (2) finds there is not good cause to waive, and therefore does not waive, the regulations and/or requirements marked "NOT APPROVED" in the "Waiver Status" column.

List of expedited regulatory waivers

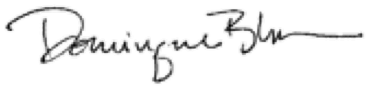
Waiver Requested	**Waiver Status/Term Expiration**	**Waiver Name**	**Regulation**	**Summary of relief from HUD Requirements**
Yes	APPROVED: Expiration 12/31/2022	Increase in Payment Standard During Housing Assistance Payment (HAP) Contract Term	24 CFR § 982.505(c)(4)	PHAs have the option to increase the payment standard for the family at any time after the effective date of the increase, rather than waiting for the next regular reexamination.
Yes	APPROVED: Expiration 6/30/2022	SEMAP Score	24 CFR § 985.105 24 CFR § 985.101	PHAs with a fiscal year end 3/31/22, 6/30/22, or 9/30/22, may request to waive the application of SEMAP in its entirety, only if the PHA has a SEMAP indicator affected directly or indirectly because of the disruption to PHA operations caused by its adoption of available CARES Act waivers.

Waiver Requested	Waiver Status/Term Expiration	Waiver Name	Regulation	Summary of relief from HUD Requirements
Yes	APPROVED: Expiration 12/31/2022	Term of Voucher: Extensions of Term	24 CFR § 982.303(b)(1)	Allows PHAs to grant a family one or more extensions of the initial voucher term regardless of the policy described in the Administrative Plan. PHAs should ensure consistency with these requests and remain in compliance with the PHA's informally adopted interim standard.
		Homeownership: Max. Term of Assistance	24 CFR § 982.634(a)	Allows a PHA to extend homeownership assistance for up to one additional year.
Yes	APPROVED: Expiration 12/31/2022	Voucher Tenancy: New Payment Standard Amount	24 CFR § 982.503(b)	PHAs may request an expedited waiver to allow for establishment of payment standards from 111 to 120 percent of the FMR.

All waiver approvals are set to expire at the end of the term requested or December 31, 2022, whichever is earliest, unless an alternative limit is provided by HUD. If any provision of these waivers or their application to any HUD requirement is made invalid by PHA omission or is no longer needed due to changing circumstances, HUD reserves the right to revoke all or a portion of these waivers at any time.

Should you have any questions, please contact the Waiver Processing Team at ***PIH_Expedited_Waivers@hud.gov.***

Sincerely,



Dominique Blom
General Deputy Assistant Secretary

Certifications of Compliance with PHA Plans and Related Regulations ***(Standard, Troubled, HCV-Only, and High Performer PHAs)***	**U.S. Department of Housing and Urban Development** Office of Public and Indian Housing **OMB No. 2577-0226** **Expires 02/29/2016**

PHA Certifications of Compliance with the PHA Plan and Related Regulations including Required Civil Rights Certifications

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the___ 5-Year and/or_X_ Annual PHA Plan for the PHA fiscal year beginning 7/1/2022 *, 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 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.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it 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.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
   - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
   - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
   - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
   - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
   - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
14. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act**,** the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Grand Rapids Housing Commission
PHA Name

MI073
PHA Number/HA Code

X Annual PHA Plan for Fiscal Year 2022

_____ 5-Year PHA Plan for Fiscal Years 20____ - 20____

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
Bobbie Butler	President
Signature	Date

Civil Rights Certification
(Qualified PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB Approval No. 2577-0226
Expires 02/29/2016

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official, I approve the submission of the 5-Year PHA Plan for the PHA of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the public housing program of the agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those program, addressing those impediments in a reasonable fashion in view of the resources available and working with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.

Grand Rapids Housing Commission	MI073
PHA Name	PHA Number/HA Code

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

Name of Authorized Official	Title
Bobbie Butler	President
Signature	Date

ATTACHMENT J

Resident Advisory Board Meeting Minutes

Tuesday, March 8, 2022
5:00 pm @ Campau Commons

Members Present: Yesica Robinson (Campau); Martha Dove (Leonard); Michael Bernier (Resident Commissioner)

Members Absent: Barbara Jones (Ransom); Leonard Webster (Creston); Ellen Fitzgerald (Mt. Mercy

GRHC Staff Present: Lindsey Reames, Executive Director

Discussion Items

- ***Review of Annual PHA Plan Submission***—The Executive Director reviewed the requirements for submission of GRHC's Annual Agency Plan and highlighted the various sections of the FY 22 plan in the draft document. Each RAB member had received a copy of the draft plan prior to the meeting to review. RAB members provided the following comments:
    - Section B-3: Progress Report—"the FSS program is a great program"; wish more would take advantage of the benefits and hope GRHC doesn't ever eliminate the program. Staff are a great support and work hard for the residents.
    - Some clarifying questions were also asked regarding policy revisions and how the program was implemented.

  RAB members were encouraged to submit any additional written comments and/or attend the public hearing scheduled for Tuesday, March 15, 2022. They were also asked to share the opportunity to review and comment on the Annual Plan with the residents at the sites they represent.

- ***Re-opening of Community Space***—The Executive Director shared that the GRHC offices (main and sites) will be fully open and operational on April 1st. This includes service programs like Meals on Wheels and health clinics.
- ***Resident Participation Plans***—The Executive Director shared that GRHC has hired a new Resident Services Manager and one of the desired outcomes for this year is that a dedicated effort be made at each site around resident participation requirements. Interest in duly elected resident councils will be visited and efforts made to ensure representation from each site on the Resident Advisory Board. During the pandemic, RAB representatives have left the program or indicated they were no longer interested in serving.

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

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 2/29/2016

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

I, Mark Washington, the City Manager
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

Grand Rapids Housing Commission
PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of Impediments (AI) to Fair Housing Choice of the

City of Grand Rapids
Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State Consolidated Plan and the AI.

The Grand Rapids Housing Commission 2022 Annual Agency Plan supports the affordable housing needs detailed in the Kent County, City of Grand Rapids and City of Wyoming Regional Consolidated Housing and Community Development Plan.

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
Mark Washington	City Manager
Signature	Date

ATTACHMENT L

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
2577-0274

Capital Fund Program - Five-Year Action Plan

Status: Approved **Approval Date:** 01/28/2022 **Approved By:** GORDON, DOUG 02/28/2022

Part I: Summary

PHA Name : Grand Rapids Housing Commission

PHA Number: MI073

Locality (City/County & State)

☒ **Original 5-Year Plan** ☐ **Revised 5-Year Plan (Revision No:)**

A.	Development Number and Name	Work Statement for Year 1 2019	Work Statement for Year 2 2020	Work Statement for Year 3 2021	Work Statement for Year 4 2022	Work Statement for Year 5 2023
	GRAND RAPIDS SCATTERED (MI073000004)	$56,251.00	$17,500.00			
	ADAMS/CAMPAU PARK (MI073000001)	$186,035.00	$164,500.00	$319,519.00	$321,962.00	$369,920.00
	AUTHORITY-WIDE	$190,045.00	$279,884.00	$90,275.00	$149,301.00	$148,469.00

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 1 2019

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	GRAND RAPIDS SCATTERED (MI073000004)			$56,251.00
ID0004	RAD (1503)(RAD (1503))	Scattered Site I (20 Units)-RAD Conversion		$42,719.00
ID0005	RAD (1504)(RAD Investment Activity (1504))	Scattered Site I (20 Units)-RAD Conversion		$13,532.00
	ADAMS/CAMPAU PARK (MI073000001)			$186,035.00
ID0026	Operations(Operations (1406))	Operations funding for Adams Park (188 units)		$186,035.00
	AUTHORITY-WIDE (NAWASD)			$190,045.00
ID0027	Administration(Administration (1410)-Salaries)	Administrative cost associated with Adam Park (188 units)		$43,015.00

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 1 2019

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0028	Scattered Site RAD Conversion(RAD Funds Pre Closing (1480))	Funding for rehabilitation work associated with conversion of the 20 Scattered Site units from LIPH to RAD		$147,030.00
	Subtotal of Estimated Cost			$432,331.00

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 2 2020

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			$279,884.00
ID0011	Operations(Operations (1406))	Scattered Site - Homeownership		$100,000.00
ID0012	Administration(Administration (1410)-Other)	Management Fee		$46,188.00
ID0031	Non-Dwelling Structures, Central Office(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other,Non-Dwelling Exterior (1480)-Doors,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Exterior (1480)-Paint and Caulking,Non-Dwelling Exterior (1480)-Roofs,Non-Dwelling Exterior (1480)-Soffits)	Repairs and improvements at the 1420 Fuller Ave Building		$69,196.00
ID0033	Central Office IT(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)	IT and security equipment additions and upgrades		$64,500.00
	ADAMS/CAMPAU PARK (MI073000001)			$164,500.00
ID0029	Dwelling Structures(Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-	Adams Park unit repairs and upgrades		$146,500.00

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 2 2020

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Interior (1480)-Call-for-Aid Systems,Dwelling Unit-Interior (1480)-Commodes)			
ID0032	Non-Dwelling Equipment, 1500 Fuller Ave Building(Non-Dwelling Construction - Mechanical (1480)-Generator)	Add generator for backup power to 1500 Fuller-Maintenance Building		$18,000.00
	GRAND RAPIDS SCATTERED (MI073000004)			$17,500.00
ID0030	Dwelling Structure Repairs(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Interior & exterior repairs at the remaining 15 Scattered Site Homeownership units		$17,500.00
	Subtotal of Estimated Cost			$461,884.00

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 3 2021

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	ADAMS/CAMPAU PARK (MI073000001)			$319,519.00
ID0016	Operations-Adams Park(Operations (1406))	Funding for Adams Park Operations		$115,000.00
ID0035	Adams Park-Dwelling Structures(Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Call-for-Aid Systems,Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Dumpsters and Enclosures,Dwelling Unit-Site Work (1480)-Electric Distribution,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Pedestrian paving,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Signage,Dwelling Unit-Site Work (1480)-Storm Drainage,Dwelling Unit-Site Work (1480)-Striping,Dwelling Unit-Site Work (1480)-Water Lines/Mains)	Interior dwelling repairs, maintenance, and improvement. Exterior building envelope		$204,519.00
	AUTHORITY-WIDE (NAWASD)			$90,275.00
ID0017	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	Central Office administrative costs		$40,979.00

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 3 2021

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0034	Fees and Costs, Central Office(Contract Administration (1480)-Other,Contract Administration (1480)-Other Fees and Costs)	Eligible contract administration costs associated with Non-Dwelling work activities at the 1420 Fuller Ave building.		$11,000.00
ID0036	Non-Dwelling Structures, Central Office (Non-Dwelling Exterior (1480)-Doors,Non-Dwelling Exterior (1480)-Lighting,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Exterior (1480)-Windows,Non-Dwelling Interior (1480)-Doors,Non-Dwelling Interior (1480)-Mechanical,Non-Dwelling Interior (1480)-Other,Non-Dwelling Interior (1480)-Plumbing,Non-Dwelling Interior (1480)-Security,Non-Dwelling Interior (1480)-Storage Area,Non-Dwelling Site Work (1480)-Asphalt - Concrete - Paving,Non-Dwelling Site Work (1480)-Landscape,Non-Dwelling Site Work (1480)-Lighting,Non-Dwelling Site Work (1480)-Site Utilities)	Non-dwelling repairs, maintenance, and improvements.		$38,296.00
	Subtotal of Estimated Cost			$409,794.00

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 4 2022

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	ADAMS/CAMPAU PARK (MI073000001)			$321,962.00
ID0021	Operations(Operations (1406))	Eligible operational costs		$132,250.00
ID0038	Dwelling Structures(Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Signage,Dwelling Unit-Site Work (1480)-Storm Drainage,Dwelling Unit-Site Work (1480)-Striping,Dwelling Unit-Site Work (1480)-Water Lines/Mains,Housing Related Hazards (1480)-Inspections,Dwelling Unit - Conversion (1480),Dwelling Unit - Demolition (1480),Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Call-for-Aid Systems,Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Dumpsters and Enclosures,Dwelling Unit-Site Work (1480)-Electric Distribution,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Other,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Pedestrian paving,Housing Related Hazards (1480)-Evaluation/Risk Assessment-Asbestos,Housing Related Hazards (1480)-Evaluation/Risk Assessment-Lead-Based Paint,Housing Related Hazards (1480)-Evaluation/Risk Assessment-Radon,Dwelling Unit-Development (1480)-Other,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Tuck-Pointing)	Eligible work activities for Adams Park		$135,000.00
ID0039	Dwelling Equipment(Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Call-for-Aid Systems,Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-	Eligible activities at Adams Park under this BLI		$25,000.00

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 4 2022

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)			
ID0040	Non-Dwelling Structures, 1500 Fuller Building (Non-Dwelling Exterior (1480)-Doors,Non-Dwelling Exterior (1480)-Gutters - Downspouts,Non-Dwelling Exterior (1480)-Lighting,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Exterior (1480)-Paint and Caulking,Non-Dwelling Exterior (1480)-Roofs,Non-Dwelling Exterior (1480)-Siding,Non-Dwelling Exterior (1480)-Soffits,Non-Dwelling Exterior (1480)-Tuck Pointing,Non-Dwelling Exterior (1480)-Windows,Non-Dwelling Interior (1480)-Doors,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Mechanical,Non-Dwelling Interior (1480)-Other,Non-Dwelling Interior (1480)-Plumbing,Non-Dwelling Interior (1480)-Security,Non-Dwelling Interior (1480)-Shop,Non-Dwelling Interior (1480)-Storage Area,Non-Dwelling Site Work (1480)-Asphalt - Concrete - Paving,Non-Dwelling Site Work (1480)-Curb and Gutter,Non-Dwelling Site Work (1480)-Landscape,Non-Dwelling Site Work (1480)-Lighting,Non-Dwelling Site Work (1480)-Signage,Non-Dwelling Site Work (1480)-Site Utilities,Non-Dwelling Site Work (1480)-Storm Drainage)	Eligible activities to include, but not limited to: -Exterior repairs, maintenance, and improvements -Interior repairs, maintenance, and improvements -Site repairs, maintenance, and improvements		$23,962.00
ID0042	Non-Dwelling Equipment, 1500 Fuller Ave Building(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)	Eligible activities to include, but not limited to: -Computer equipment to include new and replacement systems -Maintenance equipment to include new and replacement systems -Site care equipment to include new and replacement systems		$5,750.00
	AUTHORITY-WIDE (NAWASD)			$149,301.00
ID0022	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	Eligible Central Office costs		$47,126.00
ID0037	Fees and Costs, Central Office(Contract Administration (1480)-Audit,Contract Administration (1480)-Contingency,Contract Administration (1480)-Other,Contract Administration (1480)-Other Fees and Costs)	Eligible contract administration costs for Non-Dwelling work items at the 1420 Fuller Ave building		$27,000.00

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 4 2022

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0041	Non-Dwelling Structures, Central Office(Non-Dwelling Exterior (1480)-Foundation,Non-Dwelling Exterior (1480)-Doors,Non-Dwelling Exterior (1480)-Gutters - Downspouts,Non-Dwelling Exterior (1480)-Lighting,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Exterior (1480)-Paint and Caulking,Non-Dwelling Exterior (1480)-Roofs,Non-Dwelling Exterior (1480)-Soffits,Non-Dwelling Exterior (1480)-Tuck Pointing,Non-Dwelling Exterior (1480)-Windows,Non-Dwelling Interior (1480)-Administrative Building,Non-Dwelling Interior (1480)-Doors,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Mechanical,Non-Dwelling Interior (1480)-Other,Non-Dwelling Interior (1480)-Plumbing,Non-Dwelling Interior (1480)-Security,Non-Dwelling Site Work (1480)-Asphalt - Concrete - Paving,Non-Dwelling Site Work (1480)-Curb and Gutter,Non-Dwelling Site Work (1480)-Fencing,Non-Dwelling Site Work (1480)-Landscape,Non-Dwelling Site Work (1480)-Lighting,Non-Dwelling Site Work (1480)-Signage,Non-Dwelling Site Work (1480)-Site Utilities,Non-Dwelling Site Work (1480)-Storm Drainage)	Eligible work activities at 1420 Fuller Ave SE to include, but not limited to: -Exterior repairs, maintenance, and improvements -Interior repairs, maintenance, and improvements -Site repairs, maintenance, and improvements		$25,095.00
ID0043	Central Office IT(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)	Computer equipment to include new and replacement systems at the 1420 Fuller Ave Building		$50,080.00
	Subtotal of Estimated Cost			$471,263.00

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 5 2023

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	ADAMS/CAMPAU PARK (MI073000001)			$369,920.00
ID0044	Operations(Operations (1406))	Transfer to Operations		$145,475.00
ID0046	Fees and Costs, Adams Park(Contract Administration (1480)-Contingency,Contract Administration (1480)-Other,Contract Administration (1480)-Other Fees and Costs,Dwelling Unit-Development (1480)-Other)	Eligible contract administration costs for Dwelling and Non-Dwelling work.		$15,690.00
ID0048	Dwelling Structures(Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Call-for-Aid Systems,Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Dumpsters and Enclosures,Dwelling Unit-Site Work (1480)-Electric Distribution,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Other,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Pedestrian paving,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Sewer Lines - Mains,Dwelling Unit-Site Work (1480)-Signage,Dwelling Unit-Site Work (1480)-Storm Drainage,Dwelling Unit-Site Work (1480)-Striping,Dwelling Unit-Site Work (1480)-Water Lines/Mains,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Housing Related Hazards (1480)-Clearance Examinations-Asbestos,Housing Related Hazards (1480)-Clearance Examinations-Lead-Based Paint,Housing Related Hazards (1480)-Clearance Examinations-Radon,Housing Related Hazards (1480)-Hazard Controls-Asbestos,Housing Related Hazards (1480)-Hazard Controls-Lead-Based Paint,Housing Related Hazards (1480)-Hazard Controls-Radon,Housing Related Hazards (1480)-Inspections-Lead-Based Paint,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior	Eligible work activities at Adams Park		$131,000.00

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 5 2023

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Landings and Railings)			
ID0051	Non-Dwelling Structures, 1500 Fuller Building (Non-Dwelling Exterior (1480)-Doors,Non-Dwelling Exterior (1480)-Gutters - Downspouts,Non-Dwelling Exterior (1480)-Lighting,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Exterior (1480)-Paint and Caulking,Non-Dwelling Exterior (1480)-Roofs,Non-Dwelling Exterior (1480)-Siding,Non-Dwelling Exterior (1480)-Soffits,Non-Dwelling Exterior (1480)-Tuck Pointing,Non-Dwelling Exterior (1480)-Windows,Non-Dwelling Interior (1480)-Doors,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Mechanical,Non-Dwelling Interior (1480)-Other,Non-Dwelling Interior (1480)-Plumbing,Non-Dwelling Interior (1480)-Security,Non-Dwelling Interior (1480)-Shop,Non-Dwelling Interior (1480)-Storage Area,Non-Dwelling Site Work (1480)-Asphalt - Concrete - Paving,Non-Dwelling Site Work (1480)-Curb and Gutter,Non-Dwelling Site Work (1480)-Landscape,Non-Dwelling Site Work (1480)-Lighting,Non-Dwelling Site Work (1480)-Signage,Non-Dwelling Site Work (1480)-Site Utilities,Non-Dwelling Site Work (1480)-Storm Drainage)	Eligible activities to include, but not limited to: -Exterior repairs, maintenance, and improvements -Interior repairs, maintenance, and improvements -Site repairs, maintenance, and improvements		$25,920.00
ID0054	Non-Dwelling Equipment, 1500 Fuller Ave Building(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)	Eligible activities to include, but not limited to: -Computer equipment to include new and replacement systems -Maintenance equipment to include new and replacement systems -Site care equipment to include new and replacement systems		$51,835.00
	AUTHORITY-WIDE (NAWASD)			$148,469.00
ID0045	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	Eligible activities to include, but not limited to: -Salaries -Employee benefits -Employee travel		$51,839.00
ID0047	Fees and Costs, Central Office(Contract Administration (1480)-Other Fees and Costs,Contract Administration (1480)-Other)	Eligible contract administration costs for repairs, maintenance, and improvements at the 1420 Fuller Ave SE Central Office Building		$3,500.00

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 5 2023

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0053	Copy of Non-Dwelling Structures, Central Office(Non-Dwelling Exterior (1480)-Foundation,Non-Dwelling Exterior (1480)-Doors,Non-Dwelling Exterior (1480)-Gutters - Downspouts,Non-Dwelling Exterior (1480)-Lighting,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Exterior (1480)-Paint and Caulking,Non-Dwelling Exterior (1480)-Roofs,Non-Dwelling Exterior (1480)-Soffits,Non-Dwelling Exterior (1480)-Tuck Pointing,Non-Dwelling Exterior (1480)-Windows,Non-Dwelling Interior (1480)-Administrative Building,Non-Dwelling Interior (1480)-Doors,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Mechanical,Non-Dwelling Interior (1480)-Other,Non-Dwelling Interior (1480)-Plumbing,Non-Dwelling Interior (1480)-Security,Non-Dwelling Site Work (1480)-Asphalt - Concrete - Paving,Non-Dwelling Site Work (1480)-Curb and Gutter,Non-Dwelling Site Work (1480)-Fencing,Non-Dwelling Site Work (1480)-Landscape,Non-Dwelling Site Work (1480)-Lighting,Non-Dwelling Site Work (1480)-Signage,Non-Dwelling Site Work (1480)-Site Utilities,Non-Dwelling Site Work (1480)-Storm Drainage)	Eligible work activities at 1420 Fuller Ave SE to include, but not limited to: -Exterior repairs, maintenance, and improvements -Interior repairs, maintenance, and improvements -Site repairs, maintenance, and improvements		$41,295.00
ID0055	Central Office IT(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)	Computer equipment to include new and replacement systems at the 1420 Fuller Ave Building		$51,835.00
	Subtotal of Estimated Cost			$518,389.00

Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
2577-0274
02/28/2022

Part III: Supporting Pages - Management Needs Work Statements (s)

Work Statement for Year 1 2019

Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Administration(Administration (1410)-Salaries)	$43,015.00
Scattered Site RAD Conversion(RAD Funds Pre Closing (1480))	$147,030.00
Subtotal of Estimated Cost	$190,045.00

Part III: Supporting Pages - Management Needs Work Statements (s)

Work Statement for Year 2 2020

Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Operations(Operations (1406))	$100,000.00
Administration(Administration (1410)-Other)	$46,188.00
Non-Dwelling Structures, Central Office(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other,Non-Dwelling Exterior (1480)-Doors,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Exterior (1480)-Paint and Caulking,Non-Dwelling Exterior (1480)-Roofs,Non-Dwelling Exterior (1480)-Soffits)	$69,196.00
Central Office IT(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)	$64,500.00
Subtotal of Estimated Cost	$279,884.00

Part III: Supporting Pages - Management Needs Work Statements (s)

Work Statement for Year 3 2021

Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	$40,979.00
Fees and Costs, Central Office(Contract Administration (1480)-Other,Contract Administration (1480)-Other Fees and Costs)	$11,000.00
Non-Dwelling Structures, Central Office (Non-Dwelling Exterior (1480)-Doors,Non-Dwelling Exterior (1480)-Lighting,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Exterior (1480)-Windows,Non-Dwelling Interior (1480)-Doors,Non-Dwelling Interior (1480)-Mechanical,Non-Dwelling Interior (1480)-Other,Non-Dwelling Interior (1480)-Plumbing,Non-Dwelling Interior (1480)-Security,Non-Dwelling Interior (1480)-Storage Area,Non-Dwelling Site Work (1480)-Asphalt - Concrete - Paving,Non-Dwelling Site Work (1480)-Landscape,Non-Dwelling Site Work (1480)-Lighting,Non-Dwelling Site Work (1480)-Site Utilities)	$38,296.00
Subtotal of Estimated Cost	$90,275.00

Part III: Supporting Pages - Management Needs Work Statements (s)

Work Statement for Year 4 2022

Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	$47,126.00
Fees and Costs, Central Office(Contract Administration (1480)-Audit,Contract Administration (1480)-Contingency,Contract Administration (1480)-Other,Contract Administration (1480)-Other Fees and Costs)	$27,000.00
Non-Dwelling Structures, Central Office(Non-Dwelling Exterior (1480)-Foundation,Non-Dwelling Exterior (1480)-Doors,Non-Dwelling Exterior (1480)-Gutters - Downspouts,Non-Dwelling Exterior (1480)-Lighting,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Exterior (1480)-Paint and Caulking,Non-Dwelling Exterior (1480)-Roofs,Non-Dwelling Exterior (1480)-Soffits,Non-Dwelling Exterior (1480)-Tuck Pointing,Non-Dwelling Exterior (1480)-Windows,Non-Dwelling Interior (1480)-Administrative Building,Non-Dwelling Interior (1480)-Doors,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Mechanical,Non-Dwelling	$25,095.00
Central Office IT(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)	$50,080.00
Subtotal of Estimated Cost	$149,301.00

Part III: Supporting Pages - Management Needs Work Statements (s)

Work Statement for Year 5 2023

Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	$51,839.00
Fees and Costs, Central Office(Contract Administration (1480)-Other Fees and Costs,Contract Administration (1480)-Other)	$3,500.00
Copy of Non-Dwelling Structures, Central Office(Non-Dwelling Exterior (1480)-Foundation,Non-Dwelling Exterior (1480)-Doors,Non-Dwelling Exterior (1480)-Gutters - Downspouts,Non-Dwelling Exterior (1480)-Lighting,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Exterior (1480)-Paint and Caulking,Non-Dwelling Exterior (1480)-Roofs,Non-Dwelling Exterior (1480)-Soffits,Non-Dwelling Exterior (1480)-Tuck Pointing,Non-Dwelling Exterior (1480)-Windows,Non-Dwelling Interior (1480)-Administrative Building,Non-Dwelling Interior (1480)-Doors,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Mechanical,Non-	$41,295.00
Central Office IT(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)	$51,835.00
Subtotal of Estimated Cost	$148,469.00