

Annual PHA Plan (Standard PHAs and Troubled PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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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-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, 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	<p>PHA Name: <u> Fall River Housing Authority </u> PHA Code: <u> MA006 </u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u> 04/01/2018 </u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u> 2,040 </u> Number of Housing Choice Vouchers (HCVs) <u> 2,431 </u> Total Combined Units/Vouchers <u> 4,471 </u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>The Agency Plan is available at each AMP, Main offices at 85 Morgan Street and the FRHA website www.fallriverha.org. Also, the Fall River Joint Tenant Council and Fall River Community Development Agency have copies for inspection by residents and general public..</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	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:																	
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B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA?

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources.
- Rent Determination.
- Operation and Management.
- Grievance Procedures.
- Homeownership Programs.
- Community Service and Self-Sufficiency Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Asset Management.
- Substantial Deviation.
- Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s): **SEE Attachment A and Summary Of RAB Meetings**

(c) The PHA must submit its Deconcentration Policy for Field Office review.

<p>B.2</p>	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Project-Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(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.</p>
<p>B.3</p>	<p>Civil Rights Certification.</p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>B.4</p>	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, please describe:</p>
<p>B.5</p>	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p style="text-align: center;">See Attachment B</p>
<p>B.6</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>

B.7	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
B.8	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C.	<p>Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
C.1	<p>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. See HUD Form 50075.2 approved by HUD via EPIC in September 2017.</p>

Attachment A

B.1 (b) Description of revisions for each revised element.

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions

Section 8 Administrative Plan

1. Page 24 & 25—Income Limits need to be updated to those effective 4/14/17.
2. Page 126—Change the Payment Standards to new ones adopted by the Board of Commissioners on 9/17/17.
3. Page 12 CORI Policy add the wording “manslaughter” to lifetime ban.
4. Page 4 K—Jurisdiction—change to all of Massachusetts.
5. Project-based Voucher Program—possible changes to wording in Appendix

3 of the Section 8 Administrative Plan

6. Page 33—"Unit Size Selected" utility allowance used will be based on the the Voucher size.
7. Page 77—Under initial inspections, take out wording "landlord may drop off keys".
8. Page 83—Rent Reasonableness—remove paragraph 2 and add the wording to paragraph 5 this is regarding the database we are using.
9. Informal appeal hearings only for all terminations—no grievance panel hearings.
10. Former residents of Watuppa Heights who have moved into other Housing Authority Developments throughout the City of Fall River will have first preference under "special admissions" to receive a Project-Based Voucher.

Deconcentration Policy and Flat Rent Policy Changes

As of October 1, 2017, the average family income at all Federal family sites was \$14,507.00, which is within the acceptable range of \$12,331.00 and \$16,683.00 (85% to 115%). Pleasant View is the only site below the average family income (\$11,669.00), which is most likely due to that site being federalized not that long ago.. The FRHA will keep an eye on them and, if necessary, will make adjustments when selecting applicants in the future.

ADMISSIONS AND CONTINUED OCCUPANCY POLICY

Changes to the Tenant Selection and Assignment Plan section, Hierarchy of Income Verification Methods, and Transfers were made as follow;

Chapter 5

--One-Unit Offer Method—Under the One-Unit Offer Method, an applicant is offered one (1) unit, and unless the applicant has good cause for refusing the offer, the applicant should accept the unit or be dropped to the bottom of the waiting list. Not only does this approach create an incentive to accept a unit offer, it also limits the time spent offering units to each applicant to the amount of time it takes to make one offer. Additionally, the Authority's record-keeping is limited to the offer made, whether it is accepted or refused, and whether the applicant has good cause for refusal (and is entitled to another offer).

Studio Units—Studio units (which are only available in the mixed population program/Cardinal Medeiros Towers) shall only be offered to single-occupant households. This notwithstanding, there is no special distinction between studio apartments and one-bedroom units

under the mixed populations program. The available unit that has been vacant the longest will be offered to the next applicant on the mixed populations waiting list, regardless of whether it is a studio or a one (1) bedroom unit.

Unit Acceptance and Refusal (New Admissions)—All waiting list applicants awaiting admission to federal public housing units shall be made only one (1) housing offer to a unit of appropriate size and type. Only substantiated reasons which satisfy the definition of “good cause” (as defined in section 5.7.B.) for unit refusal will be accepted and result in subsequent, alternative unit offers.

Refusal of a Unit WITHOUT Good Cause—

1) **Revision to Applicant Status**—In all cases of new admissions, refusal of any unit offer without good cause shall result in the following:

--Any and all applicant preference and/or priority points shall be forfeited; AND

--Date/time of application status shall be revised to reflect the date/time of unit refusal;

AND

--Applicants will be not eligible to apply for any waiting list preference categories for a period of 12 months from the date of unit refusal.

2. **Notice to Applicant**—Upon determination that an applicant’s reason for unit refusal does NOT constitute “good cause” as defined in this policy, the FRHA shall:

--Document the reason provided by the applicant for unit refusal on the applicant record; AND

--Revise the applicant record according to requirements in Sections 5.7 C.1 and C.2 of this policy; AND

--Notify the applicant in writing of: a) their revised waiting list status per FRHA policy; b) FRHA definition of good cause for unit refusal; c) their right to request an informal review if they believe their refusal reason DOES constitute good cause.

Chapter 6

The FRHA uses the Enterprise Income Verification (EIV) as its UIV (Upfront Income Verification) source. The EIV system is a web-based application, which provides PHA’s with employment, wage, unemployment compensation and social security benefit information of tenants who participate in the public housing and various Section 8 programs under the jurisdiction of the Office of Public and Indian Housing (PIH).

Information in EIV is derived from computer matching programs initiated by HUD with the Social Security Administration (SSA) and the U.S. Department of Health and Human Services (HHS), for all program participants with valid personal identifying information (name, date of birth (DOB) and social security number (SSN) reported on HUD form 50058.

Chapter 12

Unit Transfers

Category #1: Administrative Transfers (Mandatory)

The FRHA is occasionally required to initiate transfers that have not been requested by a resident. These transfers are required in order to free a unit(s) for an important operational or policy reason. These transfers will be assigned before any other transfer type and new admissions.

Category #2: Emergency Transfers (Medical, Health & Safety)

Emergency transfers are transfers necessary to the health and/or safety of one or more household members. Residents will be required to document any special needs such as floor location, bedroom size or neighborhood during the transfer application process or before a unit is offered. These transfers shall be offered the every other 4th available unit by development and unit size. Approved emergency transfers will receive one housing offer.

Category #3: Regular Transfers (Occupancy Standards)

Regular transfers are not mandatory for continued occupancy unless they exceed the two-person per bedroom/living room threshold. They include: Under-housed; Over-housed and Incentives.

The Tenant Selection Coordinator and/or her designee shall process all mandatory and resident-initiated transfer requests; assign approved transfers to the appropriate category; determine unit assignments in accordance with the guidelines and offer available units.

Grievance Procedures

The grievance hearing panel is changing from a five (5) member board to a three (3) member board. Policy language changes are;

1) QUORUM

Reasonable efforts shall be made to have a **three-member** panel hear and decide each grievance. If a panel member without adequate notice to the FRHA fails to appear on a scheduled hearing date, or, if a panel member and his or her alternate are both not available at any time reasonably convenient for the other panel members, two members shall constitute a quorum and may render a decision. If a panel member removes themselves, or is removed after a grievance hearing has been held on a grievance, the **remaining two member**s may render a decision on the grievance.

ADDENDUM I FEDERALLY-ASSISTED PUBLIC HOUSING PROGRAMS

1. PROVISIONS FOR FEDERAL PUBLIC HOUSING PROGRAM

- A. The FRHA Grievance Procedure shall be applicable to all Tenants¹ residing in FRHA's federally-assisted public housing program.
- B. Any grievance concerning a termination of tenancy or eviction from the federally-assisted public housing program shall be excluded from the FRHA Grievance Procedure when it involves:
 - 1. Any criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises of other residents or employees of the FRHA [24 CFR § 966.51 (a)(2)(i)];
 - 2. Violent or drug-related criminal activity [42 USC 1437d(1)] on or off such premises [24 CFR § 966.51 (a)(2)(i)];
 - 3. Abuse of alcohol in such a way that interferes with the safety, health, safety or right to peaceful enjoyment of the premises by other residents or Authority personnel;
 - 4. A Tenant or household member confirmed as being subject to the lifetime state sex offender registration requirement;
 - 5. Any criminal activity that resulted in felony conviction of a household member [24 CFR § 966.51 (a)(2)(i)];
 - 6. Conviction of a Tenant or any household member for the manufacturing or producing methamphetamine on the premises of federally-assisted housing; or
 - 7. Or any judicial eviction procedures for which HUD has issued a due process determination and whereby FRHA is not required to provide the opportunity for a hearing under the PHA's administrative grievance procedure [(24 CFR § 966.51 (a)]
- C. In accordance with 24 CFR § 966.51 (b), the FRHA Grievance Procedure shall not be applicable to disputes between tenants not involving the FRHA or to class grievances. The grievance procedure is not intended as a forum for initiating or negotiating policy changes between a group or groups of tenants and the FRHA Board of Commissioners.

2. APPEALS TO FRHA BOARD OF COMMISSIONERS

For all cases pertaining to FHRA federally-funded public housing programs, either party may appeal the decision of the Grievance Panel to the FHRA Board of Commissioners if they believe that the decision is contrary to HUD regulations or is not supported by the facts presented in the case.

3. HOUSING CHOICE VOUCHER (HCV) PROGRAM

D. APPLICABILITY

The FRHA Grievance Procedure does *not* apply to participants of FRHA's federally-assisted Housing Choice Voucher (HCV) Program.

In lieu of the Grievance Procedure and in accordance with 24 CFR § 982.555 (Informal hearing for participant), FRHA must give an HCV participant family the opportunity for an *Informal Hearing* to consider whether the certain decisions relating to the individual circumstances of a participant family are in accordance with the law, HUD regulations and PHA policies.

The FRHA Housing Choice Voucher Administrative Plan details all applicable procedures for conducting informal hearings and outlines the circumstances for when a hearing is required and when it is not required.

¹ Under this section, "Tenant" shall mean the adult person (or persons) other than a live-in aide who (a) resides in the unit, and who executed the lease with the PHA as lessee of the dwelling unit, or, if no such person now resides in the unit, (b) who resides in the unit, and who is the remaining head of household of the tenant family residing in the dwelling unit.

Attachment B

Progress in Meeting Goals and Objectives for Current 5 Year Plan

1) Continue Efforts to Improve public housing management - (PHAS score) –

In 2012 our PHAS score decreased to 63 and we were designated as substandard in Management and Physical. We submitted a workout plan that was approved by HUD and progress has been achieved. Our 2013 score was 82 and the 2015 score was 84. In 2016 we continued our standard performer designation with a score of 73. In 2017 our overall unaudited score increased to 76 but due to a reporting error in units occupied we were classified as substandard management. Once REAC reviews our audited submission it is expected the overall score will increase to 78 and the classification of substandard management will be removed.

2) Continue Efforts to Improve voucher management - (SEMAP score)

Our scores have hovered around High Performer. The goal has been reached.

SEMAP Scores are as follows

2013	100 (per PIC website but we were not notified by HUD)
2014	96
2015	96
2016	100
2017	96

3) Increase customer satisfaction via Asset Management Initiatives.

The Director of Management continues making policies affecting applicants and residents easy to read and understand. A pre-application procedure for public housing admission has been initiated and has been very well received by those applying for housing.

Many documents are now available in Spanish.

4) Continue with refinement of our Asset Based Management (ABM).

With continued annual funding cuts by HUD we are constantly tweaking the assigned staffing to ensure our mission is accomplished in the most efficient manner.

5) Renovate or modernize public housing units.

Work continues on several fronts including mold remediation and bathroom replacement at Sunset Hill. Windows are being replaced in the Barresi mixed population high rise. The Diaferio Village is receiving many updates. An elevator modernization program will begin to enhance elevator operations at all of the Authority's high rises.

6) Conduct outreach efforts to potential voucher landlords.

Our Section 8 Administrator is a member of the Fall River Landlord's Association. The administrator attends their meetings and makes a presentation explaining the Housing Choice Voucher Program is and how it works. She speaks to potentially new landlords on a daily basis and meets with all new landlords to how the program works (see attachment). There are also several brochures that are provided to them regarding the HQS inspection. Landlords are encouraged to refer other landlords to us for inclusion in the program. The FRHA continues soliciting landlords to participate in the Project Basing initiative helping to increase landlords' interest in the Sec 8 HCVP program. The City of Fall River Community Development Agency has been of great assistance in this effort.

FRHA continues to provide voucher mobility counseling. Our Section 8 Staff provides clients with the procedure on moving from their current unit. They are provided with a document that explains what they need to do to move to another apartment within Fall River or any town of Massachusetts. We explain to a client who wants to move out of Fall River but within Massachusetts that the FRHA would have to find out if the rent is reasonable for that city/town depending on the payment standard. We explain to them that all the research is done by the FRHA and that it could take up to a month for the move to take place after the inspection is complete. If they want to move out of Massachusetts we explain that the paperwork will be forwarded to that particular HA once the apartment is found and that they will be dealing with that HA from that point.

7) Implement voucher homeownership program

We have amended our Section 8 Administrative Plan to include a Home Ownership Component.

8) Implement public housing or other homeownership programs at a state site.

The Massachusetts Department of Community Housing and Development (DHCD) is assessing and reviewing the situation with the Watuppa Heights vacant site. The approved Housing Improvement Plan (HIP), which governs the rebuilding on this site, calls for the building of 11 single family homes that could be available for the Homeownership program.

9) Continue implementation of public housing security improvements.

A Public Housing ESS security grant of \$250,000 was received in 2017 for equipment modifications, upgrades and replacement. This work is in the initial planning stage. The Fall River Police Department is under contract to provide additional services above baseline services covered by PILOT.

10) Continue to designate developments or buildings for particular resident groups (elderly, persons with disabilities).

We have an approved Designated Housing Plan. The Authority currently provides two (2) mixed population developments, Cardinal Medeiros Towers and Barresi Heights, which allow for the admission of elderly, disabled, near-elderly, and single-occupant non-disabled (employed) families. The Authority also manages seven (7) elderly-designated sites, allowing for the admission of the elderly and near-elderly: Doolan Apartments, Bates and Tower, Oliveira Apartments, Cottell Heights, Mitchell Heights, Holmes Apartments, Oak Village, and O'Brien Apartments.

11) Increase the number and percentage of employed persons in assisted families.

The Authority has made application for a \$2.9 million Jobs Plus Initiative grant to increase the number of working families in our Sunset Hill development. A decision on award should be made in early Spring 2018. Our Selection Preferences include working families. Our Ceiling rents also encourage working families to stay in public housing. Our

percentage of residents at or below the extremely Low Income limits has decreased from over 90% five years ago, 77% the following two years and still lower to 71% and 70%, respectively, the past two years. This is a strong indication that more families are working.

12) Provide or attract supportive services to improve assistance recipients’ employability.

Continue to assure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability. We provide applications for our programs on our Website as well as participate in the Centralized Section 8 Application process. This widespread publicity for our programs assures that they are widely available to all applicants.

13) Continue measures providing suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, disability, lesbian, gay, bisexual and transgender.

We provide applications for our programs on our Website as well as participate in the Centralized Section 8 Application process. This widespread publicity for our programs assures they are widely available to all applicants. To assure a safe living environment for all residents we have contracted with the City of Fall river to provide police at our developments. This has resulted in a more secure livable environment in our sites.

14) Continue affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required.

FHRA makes every effort to insure equal access to public housing and its amenities, services and programs by adhering to its Reasonable Accommodation Policy, which was updated in 2015.

15) Federalization of State Assisted Units

This goal has been reached as FRHA submitted and received HUD approval to federalize these units. The buildings were transferred from our state-aided public housing program. Federalization of Pleasant View took place in May 2015. A total of 481 units have been accepted into the Federal Public Housing Program.

Federalized Developments	Number of Units
Pleasant View	119
Barresi Heights	149
Doolan Apartments	152
Bates Tower	61
Total	0

16) Reduce Public Housing Vacancies

Site	Units	12/10/2014	12/10/2015	12/10/2016	12/10/2017
SUNSET HILL	355	17	16	10	11
HERITAGE HEIGHTS	127	3	9	2	5
FATHER DIAFERIO	224	9	11	8	9
OAK VILLAGE	30	0	1	1	1
O'BRIEN APTS	100	5	6	2	1
HOLMES APTS	100	4	1	2	6
OLIVEIRA APARTMENTS	84	2	1	10	4
MEDEIROS TOWERS	208	11	12	30	35
COTTELL HEIGHTS	71	3	5	4	3
MITCHELL HEIGHTS	104	4	4	4	3
NO. ROCLIFFE APTS	35	0	0	4	1

FORDNEY APTS	36	1	0	1	1
BENNIE COSTA PLAZA	60	2	3	1	0
RILEY PLAZA	25	3	0	1	1
BARRESI HEIGHTS	149	0	8	14	8
DOOLAN APARTMENTS	152	2	5	5	7
BATES AND TOWER APARTMENTS	61	4	0	3	2
PLEASANT VIEW APARTMENTS	119	6	10	3	4
TOTAL	2040	76	92	105	102

The above shown chart details vacancies over a 4 year period. Vacancies have ranged from a low of 3.7% to a high of 5.2%. Causing the higher level of vacancies is the Cardinal Medeiros and Barresi Heights properties. These two elderly/disabled designated buildings combine for 43 vacancies - nearly half of the 102 vacant units. Adjusting for these two sites reduces the overall vacancy level in 2017 to 2.9%. It is noteworthy that the 2016 county rental housing vacancy rate was estimated at 5.6%.

17) Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required.

We have incorporated physical improvements to our buildings which make them accessible to a range of disabled residents. Our staff acts as a reasonable accommodation committee and we make all reasonable changes to our sites and the individual units.

18) Continue Implementation of Asset Based Management (ABM).

We have completed implementation of Asset Based Management. We now have our Finance, Management and maintenance structured to ABM. Our Accounting and Budgeting are based on the AMPs with subsidy and CFP assigned by these AMPS. Our maintenance staff has been mostly reassigned to central maintenance to allow us to react to maintenance issues. This was included in detail in our Workout plan approved by HUD. Our Organization Structure has been modified to create a Central Office, assign day to day responsibility for site Management to the AMP staff and to clearly designate the management structure. A little bit of fine tuning will continue over the next several years but ABM has been implemented.