



ANNUAL PUBLIC HOUSING AGENCY PLAN

FY 2018-2019

HOUSING AUTHORITY OF MARICOPA COUNTY

Madison Heights (photo left) – 2017
Brian Mickelsen Housing Hero
Award, Exemplary Urban Multifamily
Project

This Plan includes basic PHA policies,
rules, and requirements concerning
HAMC's operations, programs, and
services; and, informs HUD, families
served, and members of the public of
our mission, goals, and strategic
priorities for serving the needs of
low-income, very low-income, and
extremely low-income families.

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Annual PHA Plan (Standard PHAs and Troubled PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing DRAFT	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	PHA Name: <u>Housing Authority of Maricopa County</u> PHA Code: <u>AZ009</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2018</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>126</u> Number of Housing Choice Vouchers (HCVs) <u>1592</u> Total Combined Units/Vouchers <u>1718</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission Availability of Information. HAMC Website www.maricopahousing.org HAMC Administrative Office, 8910 N. 78 th Avenue, Peoria 85345 Peoria Public Housing Office, 10950 N. 87 th Avenue, Peoria 85345 Rose Terrace Office, 525 E. Harrison Drive, Avondale 85323 Surprise Public Housing Office, 12976 W. Cottonwood, Surprise 85378 Mesa Public Housing Office, 710 W. 8 th Avenue, Mesa 85210 <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete 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	<p>Revision of PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s): Refer to Appendix B.1.</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review. Refer to Appendix B.1.</p>
B.2	<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 checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input checked="" type="checkbox"/> <input 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 checked="" type="checkbox"/> <input 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. Refer to Appendix B.2.</p>
B.3	<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. Refer to Appendix B.3.</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 <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p>A Material Weakness was identified regarding Balance Sheet Reconciliations and the balance sheet accounts are not reconciled timely and/or on a periodic basis. Most significantly, bank reconciliations were not completed timely throughout the year. Also, the bank reconciliation process includes significant recording activities. Two Significant Deficiencies were identified regarding financial data reported to HUD through the Voucher Management System was not reported in accordance with program requirements, and that financial information relating primarily to HCV portability accounts and interprogram balances and transactions were not recorded appropriately and/or reconciled in a timely basis.</p> <p>Refer to Appendix B.4.</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>Refer to Appendix B.5.</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 <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(c) 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> <p>Refer to Appendix B.6.</p>
<p>B.7</p>	<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> <p>Refer to Appendix B.7.</p>
<p>B.8</p>	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C. 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>	
<p>C.1</p>	<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.</p> <p>The most recent HUD-approved 5-year Action Plan was approved April 13, 2016. Refer to Appendix C.1 for approved 5-Year Action Plan.</p>

Appendix B. 1 Plan Elements Revised

B.1 Statement of Housing Needs and Strategy for Addressing Housing Needs

1. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families

According to the Maricopa Urban County 2015-2020 Five Year Consolidated Plan, many Maricopa County residents pay more than 50% of their income on housing and utilities.

Of the 23,471 extremely low- income renting households...	It is estimated that a total of 42,395 households (6% of all households within the Urban County) are households earning less than 30% of the median income. 92% of HAMC public housing applicants and 82% of the HCV applicants are at or below this income level. The table below describes the type of households facing housing issues at 30% of the median income.
15% are elderly 38% are small households 15% are large households 32% are one-person households	

Of the 24,679 very low-income renting households...	It is estimated that a total of 46,510 households or 6.5% of all households in HAMC’s jurisdiction are comprised of households earning between 31 to 50% of the median income with housing problems of some sort. 6% of HAMC public housing applicants and 12% of the HCV applicants are at or below 50% of the median area income level. The table below describes the type of households that were facing housing issues at 50% of the median income.
23% are elderly 34% are small households 11% are large households 32% are one-person households	

Of the 29,546 low-income renting households...	It is estimated that a total of 64,280 households or 9% of households in HAMC’s jurisdiction are comprised of households earning 51% to 80% of the median income with housing problems of some sort. This group makes up only 1% of HAMC’s public housing applicants and 6% of HCV applicants on HAMC’s current waitlist. The table below describes the type of households that were facing housing issues at 80% of the median income.
15% are elderly 39% are small households 9% are large households 37%are one-person households	

HAMC’s mission is to improve the quality of life of families and strengthen communities by developing and sustaining affordable housing programs, and an important strategic priority for the Agency is to increase housing options in underserved communities and to maintain the affordability and subsidy for each HAMC property. HAMC will accomplish all of this by:

- Serving in the County’s efforts to end chronic homelessness
- Exploring options for mixed income communities throughout Maricopa County jurisdiction
- Investigating the availability of VASH voucher funding or the viability of establishing a veterans housing program
- Repositioning and repurposing existing portfolio for supportive or affordable housing options
- Exploring the creation of a home ownership program
- Creating and implementing redevelopment strategies for the entire HAMC portfolio
- Applying for all opportunities to grow rental assistance programming
- Diversifying affordable housing options in high opportunity neighborhoods
- Applying for Moving to Work (MTW) designation
- Applying for grants that would provide additional supportive services to HAMC program participants
- Applying for grants that would provide additional housing opportunities to Maricopa County residents

2. Brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction **serviced by the PHA**

	Families with incomes below 30 percent of area median income (extremely low-income)	Elderly families and families with disabilities
Affordability	<p>Partnerships with local nonprofit agencies and the Maricopa County Human Services Department (MCHSD) have increased the resources available to residents and HCV voucher holders. Family Self Sufficiency and Resident Self Sufficiency programming has created linkages for HAMC customers to MCHSD programming to be able to improve their credit scores, obtain GED certificates, attend college, earn workforce / technology certificates, increase wage based incomes and reduce reliance on welfare assistance.</p> <p>Norton Circle in Avondale and Watson Homes in Buckeye are under review for feasible affordable housing options.</p>	Partnerships with local nonprofit agencies and the Maricopa County Human Services Department have increased linkages to programming such as SAIL case management, and personal care and home health aid.
Supply	<p>All HAMC properties, through HUD’s RAD program, are converting to Section 8 rental assistance and will undergo rehabilitation and/or redevelopment as outlined in <u>Conversion of Public Housing to Project-Based Assistance under RAD</u> section of this document. If feasible, HAMC will increase density at a property or AMP and therefore increase affordable housing supply.</p> <p>HAMC administers on behalf of Maricopa County a Tenant Based Rental Program focused on the Justice-Involved.</p> <p>The redevelopment of Coffelt and Madison through the RAD program afforded HAMC the opportunity to influence the establishment of a 10 % set aside of housing units designated for homeless individuals and families.</p> <p>Madison Heights has a designated 30 units reserved for Homeless families. In CY 2017, a total of five (5) families with a “Homeless” Designation moved into Madison Heights. As of 12/27/2017, 27 of the 30 units are occupied with families that received a Homeless preference.</p>	<p>HAMC administers 100 Bridge to Permanency subsidies on behalf of Mercy Maricopa which expands the supply of Permanent Supportive Housing in Maricopa County for individuals with serious mental illness enrolled in the public behavioral health system.</p> <p>HAMC will pursue issuance of VASH vouchers for the Veteran community in the jurisdiction should HUD indicate the vouchers are available.</p> <p>HAMC administers on behalf of Maricopa County a Tenant Based Rental Program focused on the Justice-Involved.</p> <p>HAMC and Department of Economic Security/Division of Developmental Disabilities (DES/DDD) established a partnership in the Coffelt-Lamoreaux community whereby twenty-seven (27) units will be made available at the property for occupancy by qualified DDD member referrals from DES/DDD.</p>
Quality	All HAMC properties, through HUD’s RAD program, are converting to Section 8 rental assistance and will undergo rehabilitation and/or redevelopment as outlined in <u>Conversion of Public Housing to Project-Based Assistance under RAD</u> section of this document. Each HAMC site is	All HAMC properties, through HUD’s RAD program, are converting to Section 8 rental assistance and will undergo rehabilitation and/or redevelopment as outlined in <u>Conversion of Public Housing to Project-Based Assistance under RAD</u> section of this document.

	Families with incomes below 30 percent of area median income (extremely low-income)	Elderly families and families with disabilities
	being evaluated through a Physical Needs Assessment. Upon completion, a long term improvement plan will be developed for each HAMC housing site.	
Accessibility	HAMC upgraded the website for limited English speakers and has also contracted with Language Line Solutions to provide language access to our programs by professionally trained interpreters fluent in more than 240 languages.	<p>HAMC is not required to increase the number of accessible units by a Section 504 Voluntary Compliance Agreement.</p> <p>HAMC has renovated and modernized public housing units as funding became available. HAMC has reviewed recommendations received in the Physical Needs Assessment as part of the RAD conversions and developed an improvement plan for each site to address any accessibility concerns.</p> <p>HAMC administers Section 8 project based vouchers at Apache ASL Trails, an accessibility-rich apartment housing development in Tempe, AZ, for low income residents who are deaf and hard of hearing and other persons with disabilities.</p> <p>HAMC's website complies with WCAG 2.0 AA published by the W3C, Web Accessibility Initiative (WAI). The accessible web design changes include improving the overall website (posts, links, images) as well as pdf web forms and online forms; namely the online waitlist application form shall be easy to complete with any smart phone. Website translation shall be available in English, Spanish, other languages and other assistive technology.</p>
Size of Units	As part of the RAD conversions, if a property will be receiving major renovations, HAMC may re-configure some of the larger unit sizes into smaller bedroom sized units to meet the demands for these unit sizes.	As part of the RAD conversions, if a property will be receiving major renovations, HAMC may re-configure some of the larger unit sizes into smaller bedroom sized units to meet the demands for these unit sizes.
Location	<p>The HAMC jurisdiction includes incorporated cities and towns and unincorporated areas across the Valley from Wickenburg to Queen Creek.</p> <p>HAMC submitted a Low-Income Housing Tax Credit application to the Arizona Department of Housing for the development of a Mesa, Arizona 60-unit new construction project known as "The Residences at Temple Groves" as co-developers with Gorman and Company.</p>	<p>The HAMC jurisdiction includes incorporated cities and towns and unincorporated areas across the Valley from Wickenburg to Queen Creek.</p> <p>HAMC will administer Project Based Rental Assistance at Village at Eastline in Tempe AZ.</p>

3. Provide a description of the PHA's strategy for addressing the housing needs of families **in the jurisdiction and on the waiting list in the upcoming year.** ([24 CFR §903.7\(a\)\(2\)\(ii\)](#))

When it comes to strong, safe, and healthy communities, lower cost rental housing is particularly scarce. A recent survey conducted in the Maricopa HOME Consortium shows significant waiting lists in effect for federal rental assistance programs. Many in the community await assistance from HAMC. Currently there are 6730 applicant households on HAMC Housing waitlists and 5728 families on Housing Choice Voucher waitlists.

The HAMC-MMIC BRIDGE Program grew from 50 to 100 subsidies within the first year. Though the program is not yet leased up to capacity, all of the slots are active and participants are in search mode. HAMC anticipates increasing the number of subsidies it administers on behalf of MMIC this year to 200.

HCV implemented an Attrition Program to assist in the County's efforts to end homelessness. Due to program irregularities found, HAMC put a hold on the program. HAMC met with local McKinney Vento reps to figure out the connection with homeless families within HAMC jurisdiction. Tenant Based Rental Assistance program focused on the justice-involved has been developed and executed in partnership with County Corrections and Human Services department. Staff attended Shared Housing Training and a homeless youth event. HAMC hopes to incorporate shared housing and design programming focused on serving homeless youth in the upcoming year.

Public Housing Program experienced modest improvement in CY 2017 in housing our homeless population. Fourteen (14) families, with a "verifiable" Homeless preference were pulled from the CY 2017 Public Housing Wait List and housed within our communities.

Madison Heights has a designated 30 units reserved for Homeless families. In CY 2017, a total of five (5) families with a "Homeless" Designation moved into Madison Heights. As of 12/27/2017, 27 of the 30 units are occupied with families that received a Homeless preference.

HAMC and Department of Economic Security/Division of Developmental Disabilities (DES/DDD) established a partnership in the Coffelt-Lamoreaux community whereby twenty-seven (27) units will be made available at the property for occupancy by qualified DDD member referrals from DES/DDD.

It is anticipated that the HAMC will expand their involvement in housing the homeless through: -Future Property Acquisitions in both Surprise and Tempe -Increase communication with the Bridge Program to inform of unit vacancies -Continued monitoring of Income Targeting Requirements for PBRA Wait List, which should include homeless populations.

B.1 Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions

Deconcentration Policy

The PHA will monitor its admissions to ensure that at least 40 percent (40%) of families admitted to public housing in each fiscal year shall have incomes that do not exceed thirty percent (30%) of area median income of the PHA's jurisdiction. Hereafter, families whose incomes do not exceed 30% of area median income will be referred to as "extremely low income families".

The PHA shall have the discretion, at least annually, to exercise the "fungibility" provision of the QHWRA by admitting less than 40 percent of "extremely low income families" to public housing in a fiscal year, to the extent that admissions of extremely low income families to the PHA's voucher program during a PHA fiscal year exceeds the 75 percent minimum targeting requirement for the PHA's Section 8 Voucher Program. This fungibility provision discretion by the PHA is also reflected in the PHA's Administrative Plan.

The fungibility credits will be used to drop the annual requirement below 40 percent of admissions to public housing for extremely low income families by the lowest of the following amounts:

1. The number of units equal to 10 percent (10%) of the number of newly available vouchers in the fiscal year; or
2. The number of public housing units that 1) are in public housing projects located in census tracts having a poverty rate of 30% or more, and 2) are made available for occupancy by and actually occupied in that year by, families other than extremely low-income families.

The Fungibility Floor

Regardless of the above two amounts, in a fiscal year, at least 30% of the PHA's admissions to public housing will be to extremely low-income families. The fungibility floor is the number of units that cause the PHA's overall requirement for housing extremely low-income families to drop to 30% of its newly available units.

Fungibility shall only be utilized if the PHA is anticipated to fall short of its 40% goal for new admissions to public housing.

Low Income Family Admissions

Once the PHA has met the 40% targeted income requirement for new admissions of extremely low-income families, the PHA will fill the remainder of its new admission units with families whose incomes do not exceed 80% of the HUD approved area median income.

The PBRA Program will adopt the Tenant Selection Plan (TSP), EIV Use and Security Policy and relevant housing policies to govern eligibility, selection and admission of all new participants. All in-place residents, as of December 1, 2017 will not be re-screened to determine eligibility or program admission but must adhere to TSP guidance, EIV Use and Security Policy on continued eligibility and relevant housing policies.

Eligibility, Selection and Admissions

The Public Housing program adopted the Notice of Occupancy Rights under the Violence Against Women Act (form HUD-5380). The Notice informs applicants and tenants of the protections for victims of domestic violence, dating violence, sexual assault, or stalking.

References to criminal arrests was removed from screening criteria for admission into the Public Housing Program.

Public Housing Admissions and Continued Occupancy Policy implemented the following policy changes due to regulatory updates

Mixed Family Rents

HUD regulations prohibit assistance to ineligible family members. A *mixed family* is one that includes at least one U.S. citizen or eligible immigrant and any number of ineligible family members. HAMC must prorate the assistance provided to a mixed family. To do this, HAMC must:

- (1) Determine the Total tenant payment in accordance with 24 CFR 5.628. Annual income includes income of all family members, including any family member who has not established eligible immigration status.
- (2) Family maximum rent is equal to the applicable flat rent for the unit size to be occupied by the family.
- (3) Divide the family maximum subsidy by the number of persons in the family (all household members) to determine the maximum subsidy per each family member who has citizenship or eligible immigration status (eligible household member). The subsidy per eligible family member is “member maximum subsidy.”
- (4) Divide the family maximum subsidy by the number of persons in the family (all household members) to determine the maximum subsidy per household member who has citizenship or eligible immigration status (“eligible household member”). The subsidy per eligible family member is the “member maximum subsidy”.
- (5) Multiply the member maximum subsidy by the number of family members who have citizenship or eligible immigration status (eligible household members). The product of this calculation is the “eligible subsidy”.
- (6) The mixed family TTP is the maximum rent minus the amount of the eligible subsidy.
- (7) Subtract any applicable utility allowance from the mixed family TTP. The result of this calculation is the mixed family tenant rent.

When the mixed family’s TTP is greater than the maximum rent, HAMC must use the TTP as the mixed family TTP.

Revised public housing prorated rents will be applied to a family’s rent calculation at the first annual re-certification after the revision is adopted.

Earned Income Disallowance

The EID has a two year (24-month) lifetime maximum. The two year eligibility period begins at the same time that the initial exclusion period begins and ends 24 months later. The one-time eligibility for the EID applies even if the eligible individual begins to receive assistance from another housing agency, if the individual moves between public housing and Section 8 assistance, or if there are breaks in assistance.

During the 24-month eligibility period, HAMC will conduct an interim re-certification each time there is a change in the family member’s annual income that affects or is affected by the EID (e.g., when the family member’s income falls to a level at or below his/her pre-qualifying income, when one of the exclusion periods ends, and at the end of the lifetime maximum eligibility period).

Even if the full 24 months of disallowance (12 months of full disallowance plus 12 months of 50% disallowance) have not been used, the EID will terminate 24 months from the date when the resident first qualified for the EID.

Arrest Records in Determining Eligibility

The fact that an applicant or tenant was arrested for a disqualifying offense shall not be treated or regarded as proof that the applicant or tenant engaged in a disqualifying criminal activity. The arrest may, however, trigger an investigation to determine whether the applicant or tenant actually engaged in the disqualifying criminal activity. As part of its investigation, HAMC may

obtain the police report associated with the arrest and consider the reported circumstances of the arrest. HAMC may also consider any statements made by witnesses or the applicant or tenant not included in the police report; whether criminal charges were filed; whether, if filed, criminal charges were abandoned, dismissed, not prosecuted, or ultimately resulted in an acquittal; and any other evidence relevant to determining whether or not the applicant or tenant engaged in disqualifying activity.

Extension for submission of Social Security Numbers

An applicant family with a child under the age of 6 years may become a participant family, even if the SSN for the child has not been verified at the time of admission. If the SSN has still not been verified at the end of the initial 90-day period, then the HAMC must determine whether a 90-day extension is merited. If it is not merited, then the HAMC must follow the provisions of 24 CFR 5.218. If a 90-day extension is merited, then HAMC must either verify the SSN for the child by the end of the 90-day extension period or follow the provisions of 24 CFR 5.218 regarding termination of assistance/tenancy.

Updated Definition of Extremely Low Income

Extremely low-income family. A family whose annual income does not exceed the higher of 30 percent of the area median income or the federal poverty level for the area, adjusted for family size.

Flat Rent Requirements

PHAs have the option to extend a previously approved exception request for an additional two years after the initial approval, barring any substantive market condition changes.

In the event that a PHA has conflicting LIHTC maximum rents and HUD minimum flat rents, the PHA should set flat rents so as not to exceed the LIHTC maximum rent.

HUD has set a deadline for the submission of new flat rent exception requests and extension requests, which in a typical year would be December 31, 2017. However, for the fiscal year 2018 submissions the deadline is February 16, 2018.

HUD staff will provide up to two new submission reviews with written requests for additional information, if needed. If the PHA cannot provide sufficient information to justify the exception after two requests for additional information, HUD will deny the flat rent exception request.

Market analyses accompanying new submissions must value PHA units according to local market conditions. The PHA may not request an exception flat rent that is lower than the demonstrated market value of the unit.

To improve transparency and accuracy of reporting, PHAs administering ceiling rents must use line 10b (flat rent) on the HUD Form-50058 to report the applicable maximum rental amount.

In the event that HUD receives a request to reevaluate a metropolitan area's FMRs, the 90-day flat rent exception request deadline will be calculated based on the effective date of the reevaluated FMRs.

B.1 Financial Resources

Sources	Planned \$	Planned Uses
1. Federal Grants		
a. Public Housing Operating Fund	1,445,101	Property operations (estimated based on submission of 52722/52753)
b. Public Housing Capital Fund:		Modernization of public housing units, operations and management.
AZ20P009501-17	104,891	
AZ20P009501-18	250,000	
c. Annual Contributions for Housing Choice Voucher – Based Assistance – Subsidy	13,067,136	Housing and Utility Voucher payments for the HCV Program for Port-Outs and S8 Project based vouchers.
d. Annual Contributions for Housing Choice Voucher – Based Assistance - Administration	915,785	Operating/Administrative Expenses
e. FSS Family Self Sufficiency	69,000	Grant Awarded for combined Public Housing and Housing Choice Voucher FSS program
f. (ROSS) Resident Opportunity & Self Sufficiency	85,997	Resident Self Sufficiency
2. Other Income Non Federal Sources		
a. Tenant Rents	3,408,600	Rental to fund operations and maintenance for Public Housing properties
b. Public Housing Reserves	1,000,000	RAD conversions
c. Maricopa County-HOME Funds	\$450,000	Father Fidelis Kuban Homes rehabilitation
d. Affordable Housing Program	\$1,500,000	Funds will be used for development of Coffelt Lameroux
e. Piper Trust	\$531,028	Funds will be used for development of Coffelt Lameroux
f. Resident Support Services-Madison	\$61,800	Funds on site Resident Support Services
g. Resident Support Services-Coffelt	\$158,448	Funds on site Resident Support Services
h. Bridge	\$2,279,323	Housing Assistance Payment and Supportive Services for Special Populations
i. TBRA Home	\$330,000	Housing Assistance Payment and Supportive Services for Special Populations
j. TBRA Youth Homelessness	\$330,000	Housing Assistance Payment and Supportive Services for Special Populations
k. Resident Services Capacity Building	\$50,000	Capacity Building
l. Nina Mason Pullium Fund	\$30,000	Kids Club Cooperative
Total Resources	\$26,067,109	

B.1 Rent Determination

HCV Administrative Policy Chapter 10.5 Payment Standards for the Voucher Program

The Payment Standard is used to calculate the housing assistance payment for a family and is based on Fair Market Rents (FMR) published by HUD on an annual basis. Maricopa County is included in the Phoenix Metropolitan Statistical Area (SMA) Fair Market Rents.

HAMC will maintain the payment standards at a minimum of 90% and a maximum of 110% of the published FMR. HAMC will review and analyze the payment standards on an annual basis but will not revise the payment standards each year when the new FMR's are published if the current payment standards remain at a minimum of 90% and a maximum of 100% of the newly published FMR's.

When reviewing the payment standard on an annual basis, HAMC will consider the available budget authority and determine if a reduction in payment standards is needed including an amount below 90% of the published FMR, to assist a maximum number of households up to HAMC's baseline allocation. If it is determined that payment standards below 90% of FMR is needed, a waiver will be secured from HUD with corresponding justification.

Case by case reviews of a higher payment standard will be considered as a reasonable accommodation for a family that includes a person with disabilities. If appropriate, HAMC will approve a payment standard up to 120% of the FMR.

Fair Market Rents and Payment Standards

Bedroom Size	FMR 2016	FMR 2017	Payment Standard
0	\$596	\$624	\$640
1	\$735	\$757	\$809
2	\$914	\$944	\$999
3	\$1,332	\$1,374	\$1,374
4	\$1,558	\$1,594	\$1,594
5	\$1,792	\$1,833	\$1,833
6	\$2,025	\$2,072	\$2,072

Above Payment Standards are effective 1/1/2017

B.1 Operations and Management

The goal for each HAMC managed property is to:

- Maintain the property in excellent condition
- Keep expenses within the operating budget
- Explore opportunities for revenue growth or expense reduction
- Assess and address capital needs proactively
- Comply with all Federal, State, and local laws and regulations
- Provide excellent customer service to all residents

Maintenance:

HAMC emphasizes the importance of maintaining control of the maintenance work by performing scheduled routine and preventive work. By doing so, the Authority will decrease on-demand work and maintain the property in a manner that will keep and attract good tenants.

The work order priority system ensures that the most important maintenance work is done at a time it can be performed most cost-effectively. Minimizing vacancy loss is part of the cost-effectiveness calculation. The maintenance priorities of HAMC are the following:

- Emergency Repairs
- Resident Requests
- Unit Turnover
- Inspections
- Miscellaneous

Emergency repairs are repair needs which threaten the life, health, or safety of a resident and need to be responded to within 24 hours.

Resident requests are very important to HAMC as residents can be the eyes and ears for the staff, informing them of smaller problems before they become larger problems. Providing excellent customer service will improve the living quality for the residents.

The maintenance procedure for reoccupying vacant units relies on the prompt notification by management of the vacancy, fast and accurate inspection of the unit, ready availability of workers and materials, and good communication with those responsible for leasing the unit. The Housing Manager has the authority to create special teams for vacancy turnaround or to hire contractors when it is necessary to meet the Authority goals to increase occupancy.

1. Smoke Free Housing:

All HAMC owned and managed housing developments are designated "Smoke Free" housing communities. Effective January 1, 2017, HAMC prohibited smoking and the use of tobacco products at its Administrative Office Building.

2. **Waiting Lists:** The existing Public Housing wait lists were reviewed and modified due to the forthcoming RAD conversion to Project Based Rental Assistance. The current wait lists are as follows:

Mesa Area- Office located at 710 W. 8th Ave, Mesa.

Clare Feldstadt (Site 1) 710 W. 8th Ave, Mesa consisting of all 2 bedrooms (Remain PH)

Clare Feldstadt (Site 2) 8146 E. University consisting of 1 and 3 bedroom units (Remain PH)

Guadalupe – Office located at 710 W. 8th Ave, Mesa.

Father Fidelis Kuban at Guadalupe Rd & Calle Tomi consists of 1, 2, 3, & 4 bedroom units

Surprise Area – Office located at 12976 W Cottonwood, Surprise

Casa Bonita – 12976 W. Cottonwood consists of 2, 3, and 4 bedroom apartments

Paradise Homes - Paradise Ln & Fulcher Drive has 1 and 2 bedroom units
West Valley Single Family Homes – 2, 3 & 4 bedroom homes located throughout the west valley (Remain PH)

El Mirage Area - Office located at 12976 W Cottonwood, Surprise
Flora Statler – First Ave. & Ventura St. 1, 2, 3 and 4 bedroom apartments
Villa Monterosa – Fifth Ave. & Ventura has 1, 2, 3 and 4 bedroom units

Peoria – Office located at 10950 N. 87th Drive, Peoria
John Hammond Homes at 85th & Washington consists of 2, 3 and four bedroom units
Varney Homes on 82nd Drive consist of 2 and 3 bedroom units
Peoria scattered site houses consist of 25 – 3 and 4 bedroom single family homes (Remain PH)

Parkview Estates – Office and apartments located at 10950 N. 87th Ave, Peoria, consists of one bedroom apartments for the elderly, handicapped or disabled

Tolleson Area – Office located at 10950 N. 87th Drive, Peoria
John Hollar/Baden Homes at 92nd Ave and Baden St. has 1, 2, 3 and 4 bedroom units

Avondale Area – Properties are located in the Southwest Valley and are affordable housing communities.
Norton Circle in Avondale has 1, 2, 3 and 4 bedroom units. Norton circle unit expansion from a 46-unit property to a 70-unit property.
Watson Homes, Buckeye has 1, 2, 3 & 4 bedroom units. Dispose of Watson Homes 20-unit property.

Maricopa Revitalization, Rose Terrace Apartment, and Heritage at Surprise waiting lists are managed under the Housing Choice Voucher PBV program. The Village at Eastline will be PBRA.

3. VAWA Provisions: The Admissions and Continued Occupancy Policy regarding resident transfers was modified to treat victims of domestic violence, dating violence, sexual assault or stalking as an “emergency transfer” upon request. The policy change follows HUD’s “Model Emergency Transfer Plan” related to VAWA and HAMC incorporated the use of HUD-5383 form for requesting the transfer. All applicants and tenants are being required to sign the Notice of Occupancy Rights under the violence Against Women Act.

HAMC also incorporated these policies at the HAMC managed sites, Maricopa Revitalization and Rose Terrace Apartments I and II.

B.1 Asset Management

HAMC continues to convert its entire Public Housing portfolio under HUD's Rental Assistance Demonstration (RAD). Using this affordable housing model, HAMC can preserve its housing inventory, provide project improvements and maintain resident services to address the housing needs of low-income families. Both the RAD-PBV and RAD-PBRA programs allow HAMC to convert assistance under the public housing program to long-term, project-based Section 8 assistance. The conversion has experienced considerable progress and continues to pursue strategic site development and facilitate potential housing for under-housed families within its jurisdiction.

- Effective October 1, 2017, the RAD conversion of 40 units of public housing at Rose Terrace Apartments and 13 units at Maricopa Revitalization to Project Based Vouchers (PBV).
- Effective December 1, 2017, the RAD conversion of 282 units of public housing at ten (10) separate sites to Project Based Rental Assistance (PBRA).
- The balance of the public housing portfolio is in various stages with the balance of the portfolio transitioning to Project Based Rental Assistance (PBRA).
- The RAD conversion of Madison Heights (143 units) has been completed. The conversion included the relocation of the households at Norton Circle and Watson Homes to the new site. HAMC has obtained the release of the Declarations of Trust for the two properties from HUD. With this release, HAMC is able to provide the communities with additional affordable rental housing options.
- The RAD conversion of Coffelt is completed. The opening is scheduled for April 2018.

Housing Opportunity through Modernization Act (HOTMA)

In October 2016, HUD published initial implementation guidance for HOTMA, and a few of the HOTMA provisions became effective.

- Reasonable accommodation payment standards. HOTMA allows PHAs to establish a payment standard of up to 120 percent of fair market rent (FMR) without HUD approval as a reasonable accommodation for a person with a disability. Because the streamlining rule previously provided PHAs with this flexibility, no action is required to implement this provision.
- Establishment of FMR. This provision changes how HUD publishes FMRs and the procedures for comment and requests for reevaluation. Additionally, HOTMA provides that in the housing choice voucher ([HCV](#)) program, no PHA is required as a result of a reduction in the FMR to reduce the payment standard of a family continuing to reside in a unit under HAP contract at the time the FMR was reduced. Should PHAs choose to use the higher payment standard for the family's subsidy calculation, this must be specified in the administrative plan. HUD's FMRs for 2017 already reflect the new procedures, and HUD will issue additional guidance with regards to payment standards in the future.
- Family Unification Program ([FUP](#)) for children aging out of foster care. HOTMA revises the length of the term that an FUP-eligible youth may receive FUP assistance from 18 to 36 months, in addition to revising the eligibility requirements for FUP-eligible youth. Changes to the FUP program were effective upon implementation of HOTMA and PHAs were made aware of the new provision by means of a letter to FUP PHA executive directors on August 29, 2016. Further details can be found in today's guidance.
- Preference for United States citizens or nationals. This section applies to Guam only. The provisions were effective upon enactment of HOTMA and the details can be found within today's guidance.
- Exception to PHA resident board member requirement. Certain jurisdictions, as specified in the guidance, are exempted from the resident board member requirement. While effective upon implementation of HOTMA, this exception has already been effective for a number of years through various appropriations acts.

The guidance also identified provisions not effective until HUD subsequently issues an implementation notice or regulation.

- Changes regarding initial inspections in HCV units
- Changes on the enforcement of housing quality standards ([HQS](#)) in HCV units
- Changes regarding the frequency of income reviews
- Changes on income reviews in project-based housing, in addition to changes on project-based assistance in general
- Limitations on public housing tenancy for over-income families
- Limitations on eligibility for assistance based on assets
- Changes regarding PHA-owned units
- Revisions to requirements regarding the public housing capital and operating funds
- Changes regarding the use of vouchers for manufactured housing

B.1 Significant Amendment/Modification

The Housing Authority of Maricopa County after submitting its Annual Plan to HUD, may modify, amend or change any policy, rule, regulation or other aspect of its plan. If any modifications, amendments or changes in any policy, rule, regulation or other aspect of the plan are not consistent with the HAMC Mission Statement, its Goals and Objectives, or HUD regulations, then these shall not be deemed significant amendments or modifications to the Annual and 5-Year Plan. If new program activities are required or adopted to reflect changes in HUD regulations or as a result of national or local emergencies, these activities are exempted actions and will not be considered as Substantial Deviation from the 5-Year Plan.

The definition of Substantial Deviation/Modification of the PHA Plan was amended to exclude the following items:

1. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;
2. Changes to the Capital Fund Budget produced as a result of each approved RAD conversion, regardless of whether the conversion will include use of additional Capital Funds;
3. Changes to the construction and rehabilitation plan for each approved RAD conversions; and
4. Changes to the financing structure for each approved RAD conversion.

Appendix B. 2 New Activities

B.2 Housing Choice Voucher – Administrative Plan Changes & New Activities

Chap.	Summary of Changes	Current	Effective Date of Change
TBD	Aging Youth TBRA Policy	HAMC is exploring the possibility of partnering with outside organization to provide housing assistance to youth aging out of the system.	TBD and upon Board approval
16.2	Program Fraud	Section 16.2 of the HCV Administrative Plan will again be revised to outline the difference between program fraud and debt owed. The 30 day repayment agreement and 2 nd offender policy will also be revisited based on the new definitions.	TBD and upon Board approval
	Additional Policies to Be revisited	HAMC intends to research and revisit policies within its Administrative Plan as it pertains to Portability Briefings, defining a separate family, occupancy as it relates to Liv-In-Aides, adding members to a household, restricting moves and portability with zero income. Current policies are vague. References to criminal arrests removed from screening criteria for admission into the HCV program.	TBD and upon Board approval
22	Bridge Policy	Administrative Plan to be amended to further explain the transition from BRIDGE to HCV subsidy.	TBD and upon Board approval

Housing Choice Voucher Homeless Program

HCV developed a preference to use the HCV Program to house homeless families and individuals through the use of a portion of its attrition. HAMC intends to revisit the portion of this policy as we refine the program and its procedures including but not limited to a refined referral program.

Veteran Affairs Supportive Housing (VASH)

Previously there were no vouchers available. With Congress passing the new addition and HAMC being rated a High Performing agency, HAMC hopes to get on HUD's radar.

Move to Work Demonstration (MTW)

HUD is working to operationalize the 2016 Omnibus Appropriations bill signed by the President in December 2015 to expand the MTW demonstration by an additional 100 public housing authorities (PHA) over seven years. HAMC anticipates submitting application to the MTW demonstration once HUD requests proposals.

Other Housing Programs

HAMC will continue to look for other ways to offer housing assistance by partnering with outside agencies. HAMC is dedicated to offering housing outside the traditional subsidized housing, hoping to assist some of our most vulnerable populations.

Housing Opportunity through Modernization Act (HOTMA)

In October 2016, HUD published initial implementation guidance for HOTMA, and a few of the HOTMA provisions became effective.

- Reasonable accommodation payment standards. HOTMA allows PHAs to establish a payment standard of up to 120 percent of fair market rent (FMR) without HUD approval as a reasonable accommodation for a person with a disability. Because the streamlining rule previously provided PHAs with this flexibility, no action is required to implement this provision.
- Establishment of FMR. This provision changes how HUD publishes FMRs and the procedures for comment and requests for reevaluation. Additionally, HOTMA provides that in the housing choice voucher ([HCV](#)) program, no PHA is required as a result of a reduction in the FMR to reduce the payment standard of a family continuing to reside in a unit under HAP contract at the time the FMR was reduced. Should PHAs choose to use the higher payment standard for the family's subsidy calculation, this must be specified in the administrative plan. HUD's FMRs for 2017 already reflect the new procedures, and HUD will issue additional guidance with regards to payment standards in the future.
- Family Unification Program ([FUP](#)) for children aging out of foster care. HOTMA revises the length of the term that an FUP-eligible youth may receive FUP assistance from 18 to 36 months, in addition to revising the eligibility requirements for FUP-eligible youth. Changes to the FUP program were effective upon implementation of HOTMA and PHAs were made aware of the new provision by means of a letter to FUP PHA executive directors on August 29, 2016. Further details can be found in today's guidance.
- Preference for United States citizens or nationals. This section applies to Guam only. The provisions were effective upon enactment of HOTMA and the details can be found within today's guidance.
- Exception to PHA resident board member requirement. Certain jurisdictions, as specified in the guidance, are exempted from the resident board member requirement. While effective upon implementation of HOTMA, this exception has already been effective for a number of years through various appropriations acts.

The guidance also identified provisions not effective until HUD subsequently issues an implementation notice or regulation.

- Changes regarding initial inspections in HCV units
- Changes on the enforcement of housing quality standards ([HQS](#)) in HCV units
- Changes regarding the frequency of income reviews
- Changes on income reviews in project-based housing, in addition to changes on project-based assistance in general
- Limitations on public housing tenancy for over-income families
- Limitations on eligibility for assistance based on assets
- Changes regarding PHA-owned units
- Revisions to requirements regarding the public housing capital and operating funds
- Changes regarding the use of vouchers for manufactured housing

B.2 Conversion of Public Housing to Project Based Assistance under RAD (Portfolio Conversion Summary)

HAMC's Board of Commissioners approved application to HUD to convert its public housing and portfolio under the RAD program to project-based assistance on December 11, 2013. HAMC's application to convert 461 public housing units -- the balance of its portfolio -- was accepted and issued Commitments to Enter into Housing Assistance Payment Contracts on March 27, 2015.

HAMC is converting its Public Housing to Project Based Vouchers (PBV) and Project Based Rental Assistance (PRBA) under the guidelines of PIH Notice 2012-32, REV-2, REV-3, and any successor Notices.

Upon conversion to PBV and PBRA, HAMC will adopt the resident rights, participation, waiting list, and grievance procedures listed in Section 1.6C and 1.6 D of PIH Notice 2012-32, REV-2 as it pertains to PBV, and Section 1.7B and 1.7C of PIH Notice 2012-32, REV-2. HAMC's Tenant Selection Plan and EIV Use and Security Policy drafts are included in this section.

HAMC is compliant with all fair housing and civil rights requirements. HAMC is not presently subject to a Voluntary Compliance Agreement, consent order, consent decree, final judicial ruling or administrative ruling that has any relation to or impact on the planned RAD conversion.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing HAMC with access to private sources of capital to repair and preserve its affordable housing assets. Upon conversion, HAMC's Capital Fund budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and HAMC may also borrow funds to address capital needs. HAMC will also be contributing Operating Reserves in the estimated amount of \$3,300,000 and Capital Funds in the estimated amount of \$1,000,000 towards the conversion. Current and future Capital Fund Program Grants Budgets will be reduced because of RAD conversions. Full conversion of the HAMC portfolio to PBV or PBRA will eliminate the Capital Fund Program. RAD Physical Needs Assessments (PNAs) have been completed by a third consulting party, each one of these assessments outlines capital needs and 20-year replacement schedule.

Following is specific information related to the Public Housing Developments selected for RAD:

Development # 1	CLARE FELDSTAT (Transfer of Assistance to The River at Eastline Village)		
Name of PH Development: Clare Feldstadt Homes AMP 2	Conversion Type: PBRA	EPC: The EPC plan was exited in May 2017	Transfer of Assistance (if yes, put the location if known and # units transferring): Yes 56 units
Total Units: 56	Pre-RAD Unit Type (Family, Senior, etc.): Family Units	Post-RAD Unit Type if different (i.e. Family, Senior, etc.) Family Units	Capital Fund allocation of Development (annual Cap Fund grant, divided by total number of public housing units in PHA, multiplied by total number of units in project): Based on 2015 Capital fund allocation \$ 106,389.48
Bedroom Type	Number of Units Pre- Conversion	Number of Units Post- Conversion	Change in Number of Units and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.):
Studio/Efficiency	n/a	n/a	n/a
1 Bedroom	12	12	0
2 Bedroom	20	20	0
3 Bedroom	24	24	0
4 Bedroom	n/a	n/a	n/a
5 Bedroom	n/a	n/a	n/a
6 Bedroom	n/a	n/a	n/a
If performing a Transfer of Assistance, explain how transferring waiting list	Existing Mesa wait list will be transferred.		
Identification and obligation status of public housing funds	RAD CHAP received on February 6 th , 2017 The plan is to used public housing reserves and capital funds for pre-development cost.		
Evidence of consultation with residents	Meeting November, 2013- Two Resident Meetings held, update meeting occurred on Feb 6 th , 2017.		
Description of PHA's proposed future use of the development	All 56 units will be transferred to a newly developed site in the east valley. HAMC will assess the best use once HUD releases the Declaration of Trust (DOT) from the units. The financing is anticipated to be low income housing tax credits. See details of the new project below		
Relocation Plan	A relocation plan will be developed		
Description of New Development	The subsidy for Clare Feldstat 1 and 2 will be transferred to "The River at Eastline Village" a newly constructed, 56 unit, energy efficient 4 story apartment building with on-site parking in Tempe Arizona. The building will be located on approx. 2 acres at the Northwest corner of River Road and Apache Boulevard, walking distance from a Metro light rail station. The new development will feature community spaces, services and management offices, and a small retail component. Financing will be LIHTC with HOME, CDBG and conventional mortgage financing.		

Development # 2	MARICOPA HOUSING AUTHORITY SCATTERED SITES (MHA)		
Name of PH Development: Scattered Sites AMP 7 – 45 units AMP 15 – 25 units	Conversion Type: PBRA	EPC: No	Transfer of Assistance (if yes, put the location if known and # units transferring): Yes, 70 units
Total Units: 70 Single Family Homes	Pre-RAD Unit Type (Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e. Family, Senior, etc.) Family	Capital Fund allocation of Development (annual Cap Fund grant, divided by total number of public housing units in PHA, multiplied by total number of units in project): \$ 132,986.85
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.):
Studio/Efficiency	n/a	n/a	n/a
1 Bedroom	n/a	n/a	n/a
2 Bedroom	1	1	0
3 Bedroom	57	57	0
4 Bedroom	12	12	0
5 Bedroom	n/a	n/a	n/a
6 Bedroom	n/a	n/a	n/a
If performing a Transfer of Assistance, explain how transferring waiting list	Wait list will be transferred with the project		
Identification and obligation status of public housing funds	RAD CHAP received February 23th, 2017. Public housing and capital funds will be used for pre-development and gap financing		
Evidence of consultation with residents	Resident Meetings in November & December 2013. Third meeting took place on September 2016.		
Description of PHA's proposed future use of the development	HAMC will assess the best use once HUD releases the Declaration of Trust (DOT) from the units. The assessment will include consideration of a homeownership program in partnership with local non-profits or disposition as a portfolio.		
Relocation Plan	A relocation plan will be developed		
Description of New Development	The subsidy for the 70 Scattered Site homes will be transferred to "Heritage at Surprise" a newly constructed, 100 unit, energy efficient 3 story garden apartment community in Surprise, Arizona. The buildings will be located on approx. 2.7 acres in the Original Town Site neighborhood of Surprise, within the Hollyhock Mixed Use Development. The 100 units will include a HAP for the 70 scattered site units and a separate HAP for PBV's for 30 units set aside for formerly homeless funded by the National Housing Trust Fund. The new development will feature community spaces, services and management offices. Financing will be 4% LIHTC's and Bond Financing with HOME, CDBG, NTHF and conventional mortgage financing.		

DEVELOPMENT # 3		CASAS BONITAS 282 UNIT PORTFOLIO									
Name of PH Development: Casas Bonitas 282 Unit Portfolio	Conversion Type: PBRA	EPC: Plan was exited in November 2017	Transfer of Assistance (if yes, put the location if known and # units transferring): NO								
Total Units: 282	Pre-RAD Unit Type (Family, Senior, etc.): Family, Senior	Post-RAD Unit Type if different (i.e. Family, Senior, etc.) Family, Senior	Capital Fund allocation of Development (annual Cap Fund grant, divided by total number of public housing units in PHA, multiplied by total number of units in project								
Bedroom Type	Number of Units Pre- Conversion	Number of Units Post- Conversion	Change in Number of Units and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.):								
Studio/Efficiency	n/a	n/a	n/a								
1 Bedroom	87	87	0								
2 Bedroom	101	101	0								
3 Bedroom	69	69	0								
4 Bedroom	25	25	0								
5 Bedroom	n/a	n/a	n/a								
6 Bedroom	n/a	n/a	n/a								
If performing a Transfer of Assistance, explain how transferring waiting list	n/a										
Identification and obligation status of public housing funds.	RAD PBRA HAP Executed March 28, 2017. Public housing reserves and cap funds, along with a 1 st mortgage and HOME funds from the County will be used for pre-development and Rehab costs, as well as reserves.										
Funding Details	<table> <tr> <td>New First Mortgage Loan</td> <td>\$3,880,840.86</td> </tr> <tr> <td>Public Housing Operating Reserves</td> <td>\$2,580,705.81</td> </tr> <tr> <td>Prior Year Public Housing Capital Funds</td> <td>\$1,029,655.32</td> </tr> <tr> <td>HOME</td> <td>\$450,000.00</td> </tr> </table>			New First Mortgage Loan	\$3,880,840.86	Public Housing Operating Reserves	\$2,580,705.81	Prior Year Public Housing Capital Funds	\$1,029,655.32	HOME	\$450,000.00
New First Mortgage Loan	\$3,880,840.86										
Public Housing Operating Reserves	\$2,580,705.81										
Prior Year Public Housing Capital Funds	\$1,029,655.32										
HOME	\$450,000.00										
Evidence of consultation with residents	Meetings took place in November 2013- two resident meetings held in November. A third meeting took place in September 2016.										
Description of PHA's proposed future use of the development	Plan is to rehab the 10 project sites based on the third party needs assessment. Exterior and interior paint, replace water heaters, entry doors, patio doors, flooring, interior lighting and fans, new appliances and repair/replace tub surrounds.										
Relocation Plan	N/A										
CASA BONITAS PORTFOLIO DETAIL		UNITS	CITY								
1	Park View Estates	45	Peoria								
2	Father Fidelis Kuban Homes	48	Guadalupe								
3	Varney Homes	12	Peoria								
4	John Hollar Gardens	25	Tolleson								
5	Villa Monte Rosa	18	El Mirage								
6	Flora M. Staler Homes	30	El Mirage								
7	John Hammond Homes	30	Peoria								
8	Baden Homes	20	Tolleson								
9	Casa Bonitas Homes	30	Surprise								
10	Paradise Homes	24	Surprise								
TOTAL UNITS		282									

Development # 4			
Name of PH Development: Rose Terrace Apts. AMP 13	Conversion Type: PBV	EPC: NO	Transfer of Assistance (if yes, put the location if known and # units transferring): NO
Total Units: 40	Pre-RAD Unit Type (Family, Senior, etc.): 20 Senior, 20 Family	Post-RAD Unit Type if different (i.e. Family, Senior, etc.) 20 Senior, 20 Family	Capital Fund allocation of Development (annual Cap Fund grant, divided by total number of public housing units in PHA, multiplied by total number of units in project): \$ 75,992.48
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.):
Studio/Efficiency	n/a	n/a	n/a
1 Bedroom	20	20	0
2 Bedroom	7	7	0
3 Bedroom	9	9	0
4 Bedroom	3	3	0
5 Bedroom	1	1	0
6 Bedroom	n/a	n/a	n/a
If performing a Transfer of Assistance, explain how transferring waiting list	n/a		
Identification and obligation status of public housing funds	RAD CHAP received March 27, 2015. Public housing reserves and capital funds will be used to rehab the project to specifications identified in the needs assessment.		
Evidence of consultation with residents	Two meetings held in November 2013, and again on January 29, 2016		
Description of PHA's proposed future use of the development	Existing PH units are being converted to Project Based Vouchers. The third party needs assessment identified rehab scope to include repairing parking lot/driveways, exterior painting, roof repairs, replacing water heaters, exterior/exterior lighting, bathroom fixtures, vanities and tub surrounds.		
Relocation Plan	No residents will need to be relocated with this conversion.		

Development # 5	MARICOPA REVITALIZATION PARTNERSHIP		
Name of PH Development: Maricopa Revitalization Partnership, LLC AMP 14	Conversion Type: PBV	EPC: NO	Transfer of Assistance (if yes, put the location if known and # units transferring): NO
Total Units: 13	Pre-RAD Unit Type (Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e. Family, Senior, etc.) Family	Capital Fund allocation of Development (annual Cap Fund grant, divided by total number of public housing units in PHA, multiplied by total number of units in project): \$ 24,697.56
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.):
Studio/Efficiency	n/a	n/a	n/a
1 Bedroom	n/a	n/a	n/a
2 Bedroom	5	5	0
3 Bedroom	8	8	0
4 Bedroom	n/a	n/a	n/a
5 Bedroom	n/a	n/a	n/a
6 Bedroom	n/a	n/a	n/a
If performing a Transfer of Assistance, explain how transferring waiting list	n/a		
Identification and obligation status of public housing funds	RAD CHAP received March 27, 2015. Public housing reserves and capital funds will be used to rehab the project to specifications identified in the needs assessment.		
Evidence of consultation with residents	Two meetings held in November 2013, and again on January 28, 2016		
Description of PHA's proposed future use of the development	Existing PH units are being converted to Project Based Vouchers. The third party needs assessment identified a rehab scope to include repairing driveways, duct and insulation sealing, HVAC replacements, kitchen countertops, refrigerators, light fixtures and fire extinguishers.		
Relocation Plan	No residents will need to be relocated with this conversion.		

Development 6, Norton Circle, Avondale, AZ and

Development 7, Watson Homes, Buckeye, AZ

The Norton Circle and H.M. Watson Homes apartments are older public housing project formerly owned and operated as public housing. HAMC converted the projects under HUD's Rental Assistance Demonstration (RAD) program. The HUD Declarations of Trust (DOT) were removed to allow HAMC to either rent as affordable housing with a HUD use agreement, sell the property or redevelop it.

The Norton Circle and HM Watson Homes projects was consolidated into the newly built Madison Heights project in Avondale. The rent subsidies were transferred to Madison Heights. The residents were relocated to the new Madison Heights project once it was built and ready for occupancy.

At Norton Circle, the current unit mix is 18 one bedroom, 11 two bedrooms, 13 three bedrooms and 4 four bedrooms for a total of 46 units. The project was built in 1973 and the land size is approximately 4.88 acres.

At H.M. Watson Homes; the current unit mix is 1 one-bedroom unit, 7 two-bedroom units, 10 three-bedroom units and 2 four-bedroom units for a total of 20 units. The project was built in 1958 and the land size is approximately 3 acres.

Once HUD released the DOT, units were turned and prepared for lease up. The leasing has been slow, marketing will continue to keep units occupied as we work through development plans for the properties.

The projects have no on-site amenities, no office nor any community space.

Proposal for Norton Circle Development

HAMC is proposing to redevelop the project, increasing the density from 46 units to 70 units by building a new energy efficient project with amenities competitive in the rental market. 40 of these units will be Project Based Vouchers (PBVs).

The redevelopment of Norton Circle would be financed using Tax Exempt Private Activity Bonds issued by the Industrial Development Authority of Maricopa County (IDA), 4% Low Income Housing Tax Credits and National Housing Trust Funds from the Arizona Department of Housing (ADOH).

The project would be developed in partnership with Gorman and Company who has been working with HAMC on the RAD Conversions and implementing the development strategy with HAMC.

The new development would consist of 30 one bedrooms, 20 two bedrooms and 20 three bedrooms for a total of 70 units. The project would have 40 units of rental assistance through Project Based Vouchers.

Proposal for H.M. Watson homes

H.M. Watson Homes has been in service since 1958 and has 20 units; 1 one-bedroom unit, 7 two-bedroom units, 10 three-bedroom units and 2 four-bedroom units. HAMC is in the process of evaluating the best re-use of the property given the changing dynamic of the Buckeye community and their housing needs. The Agency is exploring the possibility of using a combination of PBV's and/or the HUD Section 811 Project Rental Assistance (PRA) Program to providing integrated supportive housing for people with disabilities.



8910 N. 78th Ave. Peoria, AZ 85345

Tenant Selection Plan

Housing Authority of Maricopa County

Project Based Rental Assistance (PBRA)

Effective: December 1, 2017

HAMC is a Multi-Family Project-Based Rental Assistance property that is administered by the U. S. Department of HUD, and is designated to attract applicants for occupancy from all potentially eligible groups of people in the housing area regardless of race, color, religion, sex, national origin, disability, familial status, marital Status, source of income, age, ancestry, medical condition, sexual orientation or any other arbitrary basis. HAMC has unit sizes ranging from one (1) to four (4) bedrooms available for rent. To be eligible for occupancy at this property, there must be a match between the applicant's family size and the unit size available at HAMC. The goal of this Tenant Selection Plan is to establish a guideline for the selection of residents in accordance with HUD regulations, which will enhance the quality of life for our residents and improve the financial viability of HAMC.

Availability of Plan

This Tenant Selection Plan is available to the public upon request. It will be posted in a common area of the rental office. It may also be reviewed at 8910 N. 78th Ave., Peoria, AZ 85345 during normal office hours.

Modification of Plan

HAMC will review this Tenant Selection Plan at least once annually or when there is a change in HUD regulations to ensure that it reflects current operating practices, program priorities, and HUD requirements. If HAMC and/or HUD's Contract Administrator feel the plan needs to be modified in any way, a notice of such modification will be provided by mail to applicants on the waiting list. For this reason, the current Tenant Selection Plan in place at HAMC will always be dated.

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I. Fair Housing and Equal Opportunity Requirements

Non-Discrimination

It is the policy of HAMC to comply fully with Title VI of the Civil Rights Act of 1964, Title VIII and Section 3 of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974), Executive Order 11063, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and any legislation protecting the individual rights of residents, applicants or staff which may subsequently be enacted.

HAMC will not discriminate on the basis of race, color, sex, religion, age, disability, national origin, marital status, sexual orientation, ancestry, source of income, medical condition, or any other arbitrary basis in the leasing, rental, or other disposition of housing or related facilities, or in the use or occupancy thereof. In addition, HAMC will not:

- Deny to any applicant the opportunity to apply for housing, nor deny to any eligible applicant the opportunity to lease housing suitable to his/her needs;
- Provide housing which is different from that provided others;
- Subject a person to segregation or disparate treatment;
- Restrict a person's access to any benefit enjoyed by others in connection with the housing program;
- Treat a person differently in determining eligibility or other requirements for admission;
- Deny a person access to the same level of services; or
- Deny a person the opportunity to participate in a planning or advisory group that is an integral part of the housing program.

HAMC shall not automatically deny admission to a particular group or category of otherwise eligible applicants. Each applicant in a particular group or category will be treated on an individual basis in the normal processing routine.

Section 504 of the Rehabilitation Act of 1973

It is the policy of HAMC to assure that qualified individuals with handicaps or disabilities are not discriminated against on the basis of their handicap or disability. HAMC also assures that these individuals will have equal opportunity to receive and enjoy the benefits of living at HAMC.

Reasonable Modifications

HAMC will allow reasonable modifications to individual units or common areas when requested by applicants and residents with disabilities. If considered reasonable by HAMC, these modifications will be made at the property's expense. If deemed to be unreasonable, an active dialogue will be opened between HAMC and the disabled applicant or resident to find a mutually agreeable solution.

Reasonable Accommodations

HAMC will seek to identify and eliminate situations or procedures that create a barrier to equal housing opportunity for all. In accordance with Section 504 of the Rehabilitation Act of 1973, HAMC will make reasonable accommodation for individuals with handicaps or disabilities (applicants or residents). HAMC will make reasonable adjustments to rules, policies, and services in order to enable an applicant or resident with a

disability to have an equal opportunity to use and enjoy the unit and the common area of dwelling, or to participate in or have access to other activities conducted or sponsored by HAMC.

In reaching a reasonable accommodation with, or performing structural modifications for otherwise qualified individuals with disabilities, HAMC is not required to:

- Make structural alterations that require the removal or altering of a load-bearing structural member;
- Provide support services that are not already part of its housing programs;
- Take any action that would result in a fundamental alteration in the nature of the program or service;
- Take any action that would result in an undue financial and administrative burden on HAMC, including structural impracticality as defined in the Uniform Federal Accessibility Standards (UFAS).

Information Regarding Disabilities

HAMC ensures that any questions related to disability information on the application for housing have to do with program eligibility and allowable medical or disability deductions for housing applicants who wish to take advantage of those deductions. It is not required that any information regarding a possible handicap be revealed other than for program eligibility requirements.

Auxiliary Aids to Ensure Effective Communication

HAMC will seek to effectively communicate with applicants, residents, and members of the public who are individuals with disabilities. The use of auxiliary aides will be implemented when necessary. HAMC asks for 7 day notice in order to make any service, meeting, interview, appointment, or any business accessible. Requests for auxiliary aids may include visual alarms, tactile signs, visual doorbells, readers, interpreters, large print or Braille applications, leases, and other information/communications, recordings of such information, and a community room television that provides closed-captioning service.

Assistance Animals

HAMC will allow assistive animals which are defined as animals that work, provide assistance, perform tasks for the benefit of a person with a disability, or provide emotional support to alleviate identified symptoms or effects of a person's disability. These animals, often referred to as assistive, service, support, or therapy animals perform many disability-related services, including but not limited to guiding individuals who are blind, alerting individuals who are deaf, providing minimal protection or rescue assistance, pulling a wheelchair, fetching items, alerting persons to impending seizures, or providing emotional support to persons with disabilities who have a disability-related need for such support. No pet deposit is required for assistive animals. Appropriate rules of conduct will be provided for assistive animals. If an accommodation for assistive animals causes a financial and/or administrative burden on HAMC, or becomes a danger to the safety of the other residents or staff, the assistive animal will be denied.

Accessible Route

For mobility-impaired persons, HAMC is an accessible facility on an accessible route.

Equal Access

HAMC will provide assistance in a confidential manner and setting to insure equal access to a resident's documents. An individual with disabilities is responsible for providing her/his own transportation to and from the location where all documents are kept. Documents that the resident would like to review may be examined during regular business hours. Please contact the management office to make arrangements to examine any documents.

Mitigating Circumstances

Section 504 and Fair Housing regulations state that consideration for mitigating circumstances shall be given to all persons applying for occupancy. If an applicant feels there is a mitigating circumstance or reasonable

accommodation to be considered for determining occupancy, they should contact HAMC immediately to schedule a meeting.

II. Privacy Policy

Personal Information

It is the policy of HAMC to guard the privacy of individuals conferred by the Federal Privacy Act of 1974, and to ensure the protection of such individuals' records maintained by HAMC. Unless required by Federal or state law, neither HAMC nor its agents shall disclose any personal information contained in its records to any person or agency unless the individual about whom information is requested shall give written consent to such disclosure.

Determining Eligibility for Assistance

This privacy policy in no way limits HAMC's ability to collect such information as it may need to determine eligibility and income, compute rent, or determine an applicant's suitability for tenancy.

Information on Handicaps/Disabilities

Consistent with the intent of Section 504 of the Rehabilitation Act of 1973, any information obtained on handicap or disability will be treated in a confidential manner.

Investigations into Fraud/Criminal Activities

This privacy policy is not intended to preclude the cooperation of HAMC with local, state, or Federal investigations into fraud or criminal activity. With proper identification, HAMC is permitted to advise the investigating officer of the following:

- Whether or not an individual is a resident;
- How long an individual has been a resident; and
- Any other appropriate answers to questions related to the investigation.

HAMC will not make files, forms, or documents available to the investigating officer unless a court order for such action is provided.

III. Qualifying for Admission Under HUD's Program Eligibility Requirements

Defining Program Eligibility

Program Eligibility determines whether applicants are eligible for federal rental assistance. HAMC will not admit ineligible applicants. In order to be eligible a family must meet **all** of the following tests:

1. Income limits, 2. Social Security Numbers, 3. Citizenship Status, 4. Student Status

Income Limits

HUD establishes income limits and revises them annually to ensure that federal rental assistance is provided only to low-income families. Income limits are based on family size and the annual income the family receives. These limits are available for review at the site or management office. HAMC will determine income eligibility prior to approving any applicant for tenancy. Once the applicant moves into HAMC, this income eligibility test will not be done again unless the resident has gone to market rent and wants once again to be eligible for subsidy.

Applicants must have an income that is not greater than the maximum income limits established by HUD, and as published annually in the Federal Register. In addition, 40% of the new move-ins per year must be at or below 30% of the area median income, as required by HUD, and explained in the "Income-Targeting" paragraph below.

Method for Income-Targeting

HUD requires that Section 8 ASSISTED UNITS must lease not less than 40% of the dwelling units that become available for occupancy in any project fiscal year to extremely low-income families, which is defined as families whose incomes are below 30% of the area median income. The methodology HAMC has chosen to fulfill this obligation is to alternate between the first six (6) extremely low-income families on the waiting list and the first four (4) otherwise eligible families. It is possible that applicants of a higher income that are also higher on the waiting list will be skipped over to achieve income-targeting. When this occurs, HAMC will make a notation on the waiting list to indicate that an applicant was skipped over to achieve the 40% income-targeting rule.

Social Security Numbers

Applicants must disclose Social Security numbers for all family members and provide proof of the numbers reported. The Social Security number requirement does not apply to persons not claiming eligible immigration status. In place residents (existing residents housed within the development prior to conversion) do no need to be reverified.

Lack of Social Security Documentation

Applicants who have not disclosed and/or provided verification of SSNs for all non-exempt household members, HAMC will continue to process the application, and the applicant will have 90 days from the date they are first offered an available unit to disclose and /or verify the SSNs. During this 90-day period, the applicant may, at its discretion, retain its place on the waiting list. After 90 days, if the applicant is unable to disclose and/or verify the SSNs of all non-exempt household members, the applicant will be determined ineligible and removed from the waiting list.

Authorization for Release of Information

All adult members 18 years of age and older, in each applicant family must sign an Authorization for Release of Information (HUD form 9887/9887-A) prior to receiving assistance, and annually thereafter. Refusing to sign the Authorization for Release of Information by any adult family member will cause the family to be ineligible for assistance.

Citizenship Status

HUD requires each family member to declare whether the individual is a citizen, a national, or an eligible non-citizen, except those members who elect not to contend that they have eligible immigration status. Those who elect not to contend their status are considered to be ineligible noncitizens. For citizens, nationals and eligible noncitizens the declaration must be signed personally by the head, spouse, co-head, and any other family member 18 or older, and by a parent or guardian for minors. The family must identify in writing any family members who elect not to contend their immigration status (see Ineligible Non-citizens below). No declaration is required for live-in aides, foster children, or foster adults. In place residents (existing residents housed within the development prior to conversion) do not need to be reverified.

Student Status

Any household members who is declared a full-time or part-time student must provide acceptable documentation from an acceptable source confirming their current student status. Failure to provide documentation of any household members' student status will cause the family to be ineligible for assistance.

EIV (Enterprising Income Verification) Existing Tenant Search

HUD's EIV database will be utilized to run the Existing Tenant Search when processing an application to determine if any applicant household member may be currently residing and/or receiving assistance through another Multifamily Housing or Public and Indian Housing (PIH) location.

EXISTING TENANT SEARCH REPORT

All applicants MUST disclose if they are currently receiving HUD housing assistance. The Housing Authority of Maricopa County (HAMC) will not knowingly assist applicants who will maintain a residence in addition to the HUD-assisted unit.

HUD provides HAMC with information about an applicant's current status as a HUD housing assistance recipient. HAMC will use the Existing Tenant Search Report, during the final eligibility review, to determine if the applicant or any member of the applicant household may be currently receiving HUD assistance. An individual report must be ran for ALL HOUSEHOLD MEMBER INCLUDING CHILDREN.

Since the applicant is required to provide current landlord information on the application, HAMC should be aware of the housing assistance. Nothing prohibits a HUD housing assistance recipient from applying to this property. However, the applicant must move out of the current property and/or forfeit any HUD voucher before HUD assistance on this property will begin. Special consideration applies to minor children where both parents share 50% custody.

The report gives HAMC the ability to coordinate move-out and move-in dates with the other PHA or HAMC owned/managed property. HAMC will follow-up with the respective PHA or other HAMC owned or managed property to confirm the individual's program participation status before admission. Notations pertaining to the status of applicants currently receiving subsidy at another property must be documented on the "Section 8 Existing Tenant MO Certification" form, and the notations must include: Name of the person contacted at current applicant residence, date/time of contact, information provided including anticipated move-out date for the applicant(s) and other relevant information

If the applicant or any member of the applicant household fails to fully and accurately disclose rental history on the application, the applicant may be denied based on "misrepresentation" of information. If HAMC discovers a discrepancy, the applicant will be notified and will have 5 business days to respond to the inquiry. (Please see the "Tenant Selection Plan" for additional information pertaining to denial of applicants). HAMC will send the applicant a notice to request a meeting to discuss the information that was provided on the Existing Tenant Search report.

Failure to respond to HAMC request for additional information and/or providing false or incomplete information will result in denial and removal from the waiting list in accordance with the property's current Tenant Selection Plan.

Record Keeping-Existing Tenant Search Report

The Existing Tenant Search Report - must be maintained in the Applicant or Tenant file.

If the information on the report results in an applicant not being accepted for housing assistance based on the applicant providing false or incomplete information, the report will be maintained in the applicant's file, along with associated correspondence sent to the applicant to inform him/her of management's decision to deny him/her as an applicant.

If the information on the report results in information confirming that the applicant still resides at another property where he/she receives rental assistance, the report will be maintained in the applicant file along with the associated correspondence sent to the applicant to inform him/her of management's decision to deny him/her as an applicant, based on the fact that he/she has not moved out of another property where he/she is receiving rental assistance.

If the information provided by a current landlord, as indicated on the "Section 8- Existing MO Confirmation" form confirms that the applicant is currently being evicted an associated correspondence sent to the applicant family must be maintained in the applicants file.

A copy of the Existing Tenant Search report will be filed in each tenant file and a report must be included for each household member, including household minor and dependents. If the Existing Tenant Search report shows that any member of the applicant family is receiving rental assistance at another property, documentation must be included and noted on the Section 8 Existing Tenant MO Confirmation" form confirming the move out date as provided by the landlord. Follow up action may or may not be needed based on information provided by the landlord at the property where the applicant is currently receiving rental assistance and in accordance with the Property's Tenant Selection Plan.

MULTIPLE SUBSIDY REPORT

The **Multiple Subsidy Report** will be reviewed quarterly. The Report allows HAMC to search TRACS database to identify individuals who may be receiving multiple rental subsidies. If the report shows that a resident is being assisted at another location, HAMC must contact the household and offer them the opportunity to dispute or explain the situation, If the results of the searches (both MF and within PIH) (see search option) below shows that a tenant is being assisted at another location, HAMC must discuss these results with the household. The notice requires that the household meet with HAMC within five days of the date of the notice.

HAMC must also contact the representative PHA or owner/agent of the other property showing on any multiple subsidy report and document all information obtained regarding receipt of multiple subsidy for any household member. Information will be documented on the property's discrepancy log with notations on all follow-up completed by owner agent.

If any household member received or attempted to receive assistance in another HUD assisted unit while receiving assistance on this property, the household member will be required to reimburse HUD for assistance paid in error. This is considered a material non-compliance lease violation and may result in penalties up to and including evictions and pursuit of fraud charges.

Search Options- Multiple Subsidy Report

When running **the Multiple Subsidy Report**, HAMC will perform both of the search options as shown below to determine if possible multiple subsidies exist:

Search within MF

Search within PIH

Recordkeeping-Multiple Subsidy Report

Print out and maintain a copy of the **Multiple Subsidy Report** in the EIV discrepancy log file, and include notations as to the outcome of contacts with the residents and/or PHA or owner/agent of other property. In addition, a copy of the **Multiple Subsidy Report** for the resident plus any documentation supporting any contacts made or information obtained to determine if a household and/or household member is receiving multiple subsidies as well as documentation to support any action taken if a household and/or household member is receiving subsidies must be retained in the tenant file.

The tenant file must only contain information for that particular household. Reports may need to be manually separated so that only information for the household is included in the tenant file.

Refer to HUD Handbook 4350.3, Rev 1 as well to determine if households receiving multiple subsidies should be terminated in accordance with the HUD Model Lease and charged market rent for unpaid subsidy at the property as a result of multiple subsidies.

No Income Report

The **No Income Report** will be reviewed quarterly. The report provides HAMC with the list of tenant whose identities were verified by the SSA, but do not have or never have received SSA/SSI benefits or wages. Information obtained in the **No Income Report** must be compared to information provided by the applicant/tenant and any/all discrepancies with the information should be researched. Applicants/Tenants declaring to have no household income should be listed on the **No Income Report** and if not listed on this report additional steps must be taken by the HAMC to determine why the household is listed.

Discrepancies between information provided by the applicant/tenant and the information obtained in the **No Income Report** should be handled in the same manner as discrepancies obtained in the **Income Discrepancy Report** and all discrepancies must be documented, discussed with the applicant/tenant, and resolved within (30) days of the date of the report.

Correction must be made for unreported or under-reported household income by processing the appropriate 50059 and processing repayment agreements (as warned) based on the timeframes and amount of subsidy owed by the household, if any. In addition, households reflected on the **No Income Report** that have not reported to HAMC - that household is currently receiving income should be contacted to review the information obtained and compared to information provided to the household. Sources of income not included on the **No Income Report** must be accounted for, verified according to the HUD Handbook 4350.3 guidelines and included on the household's 50059, such as child support income, recurring gifts, benefits not included in the EIV System, etc.

All household reporting zero income must complete a Section 8 - Zero Income Questionnaire in accordance with the "Section 8 - Standard Operating and Procedures Manual" on a quarterly basis as well. The questionnaire is intended to confirm households are meeting daily needs and to ascertain if there is unreported household income that should be included as part of the household's annual income.

Recordkeeping - No Income Reports

HAMC will maintain the **No Income Reports** with the EIV Discrepancy log file and include any documentation and correspondence with the household(s) to discuss discrepancies between the individual household reported income and the **No Income Report**. In addition, the owner/agent will maintain individual **No Income Report** in the tenant file along

with any/all documentation and correspondence with the household relative to the household’s reported income amounts and the **No Income Report**.

The owner/agent will “purge” EIV printouts at the end of tenancy plus 3 years. HAMC will document the resident’s file when information is destroyed. When documenting this action, provide information about when and how the information was destroyed.

Reporting at Annual Certification, Interim Certification and Unit Transfer

Aside from the reports previously mentioned, the EIV Income Reports will be reviewed during annual and interim re-certification. The Income report will be printed and reviewed within 90 days after transmission of the move-in certification through iMAX and any income discrepancies will be resolved within 30 days of the income report date. Reports will be produced and reviewed based on the following schedule:

Annual Certification Month	Discrepancy and Income Report Viewed for Annual Certification
January	November 1-10
February	December 1-10
March	January 1-10
April	February 1-10
May	March 1-10
June	April 1-10
July	May 1-10
August	June 1-10
September	July 1-10
October	August 1-10
November	September 1-10
December	October 1-10

Only Residence

Applicants must agree that their rental unit will be their only residence. When applicants are undergoing income limit tests, they are required to reveal all assets they own including real estate. They are allowed to own real estate, whether they are retaining it for investment purposes as with any other asset, or have their property listed for sale. However, they may never use this real estate as a residence while they live in HUD-assisted housing.

Rent Formula for Section 8

Applicants must agree to pay the rent required by the Section 8 subsidy formula used at HAMC, which is defined in HUD’s Occupancy Handbook, HUD Handbook 4350.3 REV-1, CHG-2 as follows:

The applicant/resident will pay the greater of:

- 30% of the monthly-adjusted income
- 10% of the monthly gross income
- Welfare Rent

or

- Minimum Rent of \$25

Hardship Exceptions

HAMC will waive the minimum monthly rent requirement to any family unable to pay due to a long-term financial hardship. The financial hardship exemption constitutes the only statutory exemption, and includes the hardship

situations listed below. **NOTE:** A family who is eligible for and receives a hardship exemption must be recertified every 90 days.

- The family has lost federal, state, or local government assistance or is waiting for eligibility determination (including legal immigrants);
- The family would be evicted if the minimum rent requirement was imposed;
- The family income has decreased due to a change in circumstances, including but not limited to, loss of employment;
- A death in the family has occurred;
- Other applicable situations, as determined by HUD, have occurred.

Annual Recertification Policy

HAMC will conduct a recertification of family income and composition annually. All family members must supply the information requested by management, owner, and HUD. Tenants must sign the required consent forms and HAMC will obtain third party verification of the required documentation, including annual income, the value of assets, authorized deductions from annual income and other factors that affect the determination of adjusted income. HAMC will then recompute the rent and assistance payments, if applicable, based upon the information gathered. Failure, by the resident, to comply with the recertification process will result in termination of rental assistance.

HAMC will not conduct annual recertification for those residents paying full contract or market rent, unless the resident request certification to determine their eligibility to received assistance.

Interim Recertification Policy

Further, to ensure that assisted families pay rents based on their ability to pay, applicants must understand and agree to HUD's requirement that they are required to supply interim information to HAMC when the following occurs between annually scheduled re-certifications: A family member moves in/out of the unit;

- An adult member of the family who was reported as unemployed on the most recent certification obtains employment; or
- The family's income cumulatively increases by \$200 or more per month.

Notification Policy

HAMC will inform residents, through required written notices, about their responsibility annually to provide information about the family's income, which is necessary to properly complete a recertification.

Eligibility under the Noncitizen Rule

According to Section 214 of the Housing and Community Development Act of 1980 (commonly known as the Noncitizen Rule), federal rental assistance is restricted to the following:

- a. U.S. citizens or nationals; and
- b. Noncitizens who have eligible immigration status as determined by HUD.

These requirements apply to applicants, families on the waiting list and tenants. HAMC will determine citizenship status for each applicant at the initial eligibility determination, prior to move in. Some families will qualify as mixed families, – i.e., a family with one or more ineligible members and one or more eligible members. Mixed families received prorated assistance based upon the number of eligible and ineligible family members. For family members who move in after eligibility, the required forms and evidence of citizenship must be submitted at the first interim or regular recertification after the person moves to the unit. As part of the annual or interim recertification process, HAMC will also determine the citizenship/immigration status of tenants from whom they have not previously collected the proper documentation or whose documentation suggested that their status was likely to change. If the status of a family member in a mixed family changes, the family may request an intern certification. HAMC will notify families in writing if they are found to be ineligible based upon citizenship/immigration status.

Declarations and Verifications of Citizenship

All family members, regardless of age, must declare their citizenship or immigration status via a specific Declaration or Verification Form, the exact type of which depends on the applicant's status. All applicants for assistance will be given notice of the requirement to submit evidence of citizenship or eligible immigration status at the time of application. A separate form must be signed by each member of the family. For family members under the age of 18, the form must be signed by an adult member of the household. The following documents are required:

For U.S. citizens: A Declaration of Citizenship Form. In addition, HAMC requires a copy of the applicant's birth certificate.

For Noncitizens under the age of 62: (1) A Verification Consent Form; (2) Declaration of Eligible Immigration Status; (3) One of the documents approved by the Department of Homeland Security as acceptable evidence of immigration status.

Noncitizens age 62 and over: Noncitizens who are age 62 and older are not required to be further verified regarding their immigration status other than signing a Declaration of Eligible Immigration Status, and providing a proof of age document.

For noncitizens who are in this country on a visa, and are not immigrants: There is an appropriate place on the Verification Consent Form for them to sign stating that they do not claim to have eligible immigrations status and are not therefore eligible for assistance.

Verification Delay: HAMC will not delay or terminate the family's assistance if the family submitted its immigration information in a timely manner but the Department of Homeland Security verification or appeals process has not been completed. In addition, if at least one family member has submitted the required documentation to HAMC in a timely manner, and the family comes to the top of the waiting list, HAMC will offer the unit and provide prorated assistance based upon those family members who submitted their documentation on time. Prorated assistance will continue until the remaining family members submit the required documentation. Once HAMC completes the verification process, it will do one of the following:

1. Provide full assistance if all of the family members establish citizenship or eligible immigration status.
2. Continue to provide prorated assistance if any of the family members are ineligible based upon citizenship or immigration status OR
3. **Temporary Deferral of Termination of Assistance.** If the family does not accept an offer of prorated assistance, then HAMC will offer a temporary deferral of termination of assistance in order to provide the family with time to find alternative housing. The initial deferral period is six (6) months and may be extended for a maximum of two additional six (6) month periods. At least sixty (60) days before the termination of each deferral period, HAMC will notify the family if they qualify for another deferral."

Eligibility under the Student Rule

On November 30, 2005, Congress enacted Public Law 109-115, which included in Title III, Section 327, appropriations for HUD regarding eligibility of students for assisted housing under Section 8. Owners are required to determine a student's eligibility for Section 8 assistance at move-in, annual recertification, initial certification (when an in-place tenant begins receiving Section 8), and at the time of an interim recertification if one of the family composition changes reported is that a household member is enrolled as a student. HAMC will use the following HUD guidelines as indicated in Chapter 3 of HUD's occupancy handbook, HUD Handbook 4350.3 REV-1.

Students Who are NOT Eligible for Section 8 Assistance

According to Section 327(a) of the law, Section 8 assistance shall not be provided to any individual who:

- Is enrolled as either a part-time or full-time student at an institution of higher education for the purpose of obtaining a degree, certificate, or other program leading to a recognized educational credential; and
- Is under the age of 24; and
- Is not married; and
- Is not a veteran of the United States Military; and
- Does not have a dependent child; and
- Is not a person with disabilities, as such term is defined in 3(b)(3)(E) of the United States Housing Act of 1937 (42 U.S.C. 1437a(b)(3)(E)) and was not receiving section 8 assistance as of November 30, 2005); and
- Is not living with his or her parents who are receiving Section 8 assistance; and
- Is not individually eligible to receive Section 8 assistance **and** has parents (the parents individually or jointly) who are not income eligible to receive Section 8 assistance.

NOTE: Unless the student can demonstrate his or her independence from parents, the student must be eligible to receive Section 8 assistance and the parents (individually or jointly) must be eligible to receive Section 8 assistance in order for the tenant to receive Section 8 assistance.

Defining Independent Student

If an individual can prove independence from his/her parents, therefore meeting the handbook definition of “independent student,” and does not meet any of the criteria in Section 327(a) above, but is otherwise eligible for assistance, the student would be eligible to move into a HAMC property and receive assistance. Non-tuition financial assistance would be counted as income unless the student is over 23 with a dependent child.

For a student to be eligible independent of his/her parents (where the income of the parents is not relevant), the student must demonstrate the absence of, or his/her independence from his/her parents. The student must meet, at a minimum, **all** of the following criteria to be eligible for Section 8 assistance. The student must:

- Be of legal contract age under state law;
- Have established a household separate from parents or legal guardians for at least one year prior to application for occupancy, **or** Meet the U.S. Department of Education’s definition of an independent student, as indicated in the handbook Glossary);
- Not be claimed as a dependent by parents or legal guardians pursuant to IRS regulations; and
- Obtain a certification of the amount of financial assistance that will be provided by parents, signed by the individual providing the support. This certification is required even if no assistance will be provided.

Defining Student Financial Assistance Income

Any financial assistance a student receives (1) under the Higher Education Act of 1965, (2) from private sources, or (3) from an institution of higher education that is in excess of amounts received for tuition is included in annual income, except if the student is over the age of 23 with dependent children or if the student is living with his or her parents who are receiving Section 8 assistance. (See the Glossary of HUD Handbook 4350.3 REV-1 for an expanded definition of Student Financial Assistance.)

Protection from Eviction

HAMC will not evict or require an ineligible student to move from a unit as long as the student is paying market rent and is in compliance with the terms of the lease.

Verifying Information

The applicant must agree to furnish any information required to verify eligibility for rental assistance including all sources of income, assets, and certain expenses. Applicants are hereby informed that, by law, the penalties for false information may include eviction, loss of assistance, fines up to \$10,000, and imprisonment up to five years. The applicant must understand that a final decision of eligibility cannot be made until all verifications are complete. In addition, the applicant must understand that HUD has the right to compare any of the information supplied in the verifications with information that federal, state, or local agencies have on the family's income and household composition.

HAMC must explain all program requirements to applicants, including the following verification procedures:

Individual Verification Consent Forms

In addition to the Authorization for Release of Information and the appropriate Consent Forms indicated earlier, applicants must sign Individual Verification Forms that have been designed by HAMC for obtaining documentation from third parties, to verify an applicant's income and deductions for determining the rent.

Verification Documentation

Documentation used as part of the verification process may include checklists completed and signed by the applicant, verification forms completed and signed by third parties, dated notes of interviews with third parties whether by phone or in person, documents provided by family members, or affidavits/certifications supplied by the applicant.

HAMC will make the final determination of the credibility of any verification submitted by an applicant.

Preferred Forms of Verification

Verifications must be attempted in the order indicated below. Each file will be documented to show that HAMC attempted to obtain third party written documentation before relying on some less acceptable form of information.

- Third party written;
- Third party oral with a record kept in the file;
- Review of documents provided by the family, or
- Affidavits from the family.

Verifying Zero Income

If an applicant reports zero income on an application, HAMC will advise her/him that if they are still at zero income when they come to the top of the Waiting List, they will be asked to fill out a questionnaire prepared by HAMC stating their source of necessary living items that are not covered by Food Stamps or other federal assistance sources. After 90 days at zero income, and for every 90-day period thereafter, the resident may be re-certified to determine if they have begun to receive any type of income. If a resident goes through four 90-day periods at zero income, HAMC may make a visit to the dwelling unit to determine the likelihood of the resident's report. If the resident is found to have a car, a telephone, cable television, cigarettes, disposable diapers, or other evidence of some form of income, the applicant may be asked to explain the source of income supporting cash expenditures when zero income has been reported. A Family Budget or Statement of Financial Responsibility may be required from the applicant. Investigations may include ordering a credit report on the resident after proper notice is given.

Attempted Fraud

Any information provided by the applicant that is later proven to be untrue by verification may be used to disqualify the applicant for admission on the basis of attempted fraud. Fraud is defined in Par 8-13 A of the HUD handbook 4350.3 Rev. 1 as an applicant/resident knowingly providing inaccurate or incomplete information. Unwitting errors that do not secure an advantage with regard to program eligibility, preferences, or rent will not be used as a basis to exclude applicants. HAMC considers false information about the following items to be grounds for rejecting an applicant:

- Income, assets, family composition, Social Security numbers, allowances; and
- Previous resident or criminal history

IV. Qualifying for Admission Under HUD's Project Eligibility Requirements

Defining Project Eligibility

Project Eligibility establishes whether applicants are eligible to reside in the specific property to which they are applying. The Occupancy Standards listed below take into consideration not only type, but also household size and what unit sizes are available at HAMC. It is possible that a household might be eligible for subsidy under HUD's requirements, but would not be eligible under the unit size requirements of this particular property.

Occupancy Standards

Occupancy Standards is the minimum and maximum number of occupants residing in a unit. When applying to HAMC, the appropriately sized unit must be in the unit configuration within the development. Units are assigned according to household size and composition. If the appropriate unit size is not available at the time of application, the applicant will be put on a waiting list. To avoid overcrowding, and in order to be consistent, we have adopted the following occupancy standards:

Bedroom	Minimum	Maximum
1	1	3
2	2	5
3	3	7
4	4	9

Defining Persons with Disabilities

- (1) Any adult having a physical, mental, or emotional impairment that is expected to be of long-continued and indefinite duration, substantially impedes his or her ability to live independently, and is of a nature that such ability could be improved by more suitable housing conditions.
- (2) A person with a developmental disability, as defined in Section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 6001(8)), i.e., a person with a severe chronic disability that:
 - (i) Is attributable to a mental or physical impairment or combination of mental and physical impairments;
 - (ii) Is manifested before the person attains age 22;
 - (iii) Is likely to continue indefinitely;
 - (iv) Results in substantial functional limitation in three or more of the following areas of major life activity:
 - (A) Self-care,
 - (B) Receptive and expressive language,
 - (C) Learning,
 - (D) Mobility,
 - (E) Self-direction,
 - (F) Capacity for independent living, and
 - (G) Economic self-sufficiency; and
 - (H) Reflects the person's need for a combination and sequence of special, interdisciplinary, or generic care, treatment, or other services that are of lifelong or extended duration and are individually planned and coordinated.
- (3) A person with a chronic mental illness, i.e., a person who has a severe and persistent mental or emotional impairment that seriously limits his or her ability to live independently, and whose impairment could be improved by more suitable housing conditions.
- (4) Persons infected with the human acquired immunodeficiency virus (HIV) who are disabled as a result of infection with the HIV are eligible for occupancy in the Section 202 projects designed for the physically disabled, developmentally disabled, or chronically mentally ill depending upon the nature of the person's disability. (24 CFR 891.505)

Note: A person whose sole impairment is alcoholism or drug addiction (i.e., who does not have a developmental disability, chronic mental illness, or physical disability that is the disabling condition required for eligibility in a particular project) will not be considered to be disabled for the purposes of the Section 202 program.

- (5) A person infected with the human acquired immunodeficiency virus (HIV) and a person who suffers with alcoholism or drug addition, provided they meet the definition of “person with disabilities” in Section 811 (42 U.S.C) 8013(k)(2). A person whose sole impairment is a diagnosis of HIV positive or alcoholism or drug addiction (i.e., does not meet the qualifying criteria in Section 811 will not be eligible for occupancy in a section 811 project. (24 CFR 891.305)

Assigning Units for Persons with Physical Disabilities

HAMC will always give a family that has indicated a need for certain unit accommodations because of a disability, the opportunity to benefit from the HUD program in place. HAMC asks the family to decide for itself, in compliance with Section 504 of the Rehabilitation Act, whether a unit meets the needs of the family. HAMC will notify the household whenever any unit becomes available, without regard to unit accessibility. HAMC will never prohibit an eligible family with a member who has a disability from accepting a suitable non-accessible unit if no accessible unit is available when the family reaches the top of the waiting list. If the applicant decides to accept a standard unit, s/he may request some modification to the unit as a reasonable accommodation.

Assigning Accessible Units

If a unit becomes available that has either been made accessible under Section 504, or was originally designed for disabled households when HAMC was approved for funding, HAMC will first offer the unit to an individual with disabilities who is currently residing in a non-accessible unit who requires the features of the unit. If there is no such current resident, HAMC will offer the unit to the next qualified applicant on the waiting list who needs the features of the accessible unit.

When neither a current resident nor a qualified applicant require the features of an available accessible unit, HAMC will offer the unit to another resident or applicant, and will incorporate as an addendum to the lease an agreement that the resident will move to a non-accessible unit within HAMC when one becomes available. This addendum will also cover whether the resident or HAMC will pay for the cost of such a move.

Reasonable Accommodation

HAMC will consider requests for reasonable accommodations from applicants/residents with disabilities, in order that they may benefit from the use and enjoyment of the dwelling units. The applicant/resident must be able to show that the requested accommodation is necessary, and that there is a strong, identifiable relationship between the requested accommodation and the individual’s disability.

If a household requests an accessible feature, policy modification, or other reasonable accommodation, HAMC will provide the requested accommodation unless doing so would result in a fundamental alteration in the nature of the program, or an undue financial and administrative burden. A fundamental alteration is a modification that is so significant that it alters the essential nature of the operations of the HAMC property.

Policy for Unit Transfers

Requests from Residents

Once an applicant has become a resident, a transfer of units may be warranted. If a resident has an increase in family size, or has a medical/health condition that warrants a larger unit or a unit that has special design features for a person with disabilities, a transfer may be requested. On occasion there may be other requests for transfers that HAMC will consider on a case-by-case basis. All transfer requests must be made in writing, and must state the reason for the request. The request will then be forwarded to HAMC manager/owner for final approval.

Requirement by Owner

On occasion an owner may require a resident to transfer to a smaller unit size. This may occur when the family composition decreases and the family no longer qualifies for the unit size in which they are dwelling. If a unit of appropriate size is not available, HAMC will not evict the family and will not increase the family's rent to the market rent. However, if an appropriately sized unit is available and the family refuses to move, the family may stay in their current unit and pay the HUD-approved market rent. HAMC may evict the family if the family fails to pay the market rent in accordance with the lease.

Acceptable Reasons for Transfers

Current residents may qualify for a unit transfer for one of the following conditions:

- Medical/health conditions, including inability to use stairs, or the need for a live-in attendant;
- Family size increases or decreases, or composition changes;
- There is a need for a unit with special design features for a person with disabilities; or
- Other potential conditions not related to health, which will be reviewed on a case-by-case basis by Management.

Placement on Transfer Waiting List

If the HAMC manager approves a request for a transfer to a different unit, and there is no current unit available, the resident will be placed on the HAMC transfer waiting list. In-house residents that must be transferred due to overcrowding will be transferred first. Residents needing transfers due to medical reasons must have a written statement from a health care provider.

Procedures for Filling Vacancies

If a request for a transfer to a different unit is approved, the resident agrees to pay all transfer costs prior to the move. Costs may include damages that are beyond normal wear and tear. However, if a resident is transferred as an accommodation to a household member's disability, then HAMC may be obligated to pay the costs associated with the transfer as discussed under Section 504 of the Rehabilitation Act of 1973 of Chapter 2 of HUD Handbook 4350.3 REV-1.

Priority for Filling Vacancies

HAMC will fill its vacant units with current residents awaiting transfers before applicants from HAMC waiting list. Unit transfers that are required by management will take priority over resident requested transfers.

Preferences

Elderly Election

HAMC has not made an election to give preference for the elderly as allowed under Title VI, Subtitle D of the Housing and Community Development Act of 1992, and as explained in HUD Handbook 4350.3 REV-1, Par 3-18.

V. Qualifying for Admission Under HAMC' Standards

Property Standards for Bedroom Size

Being eligible for federal rental housing is not an entitlement. Every applicant must meet the resident selection criteria set in place at HAMC. These standards are used to demonstrate the applicant's suitability as a resident. They are determined by verifying information on past behavior to document the applicant's ability, either alone or with assistance, to comply with essential lease provisions and any other rules governing tenancy.

Two Persons Plus One per Bedroom

HAMC has adopted a bedroom size standard of two plus one person per bedroom (please see chart on page 18). This standard serves to prevent the over-utilization or under-utilization of units that could result in an inefficient use of housing assistance. This standard also ensures that residents are treated fairly and

consistently in order to receive adequate housing space. HAMC will not make social judgments on a family's sleeping arrangement.

Families with Children

The Fair Housing Act prohibits properties receiving Federal assistance from discriminating on the basis of familial status, making it illegal to discriminate against families because of the presence of persons under the age of 18. HAMC will neither exclude families with children, nor will they develop policies or procedures that have the purpose or effect of prohibiting children. HAMC will not exclude eligible elderly families because of the presence of children, or because of the anticipated presence of children.

Counting Family Members

In order to determine the size of unit that would be appropriate for a particular family, HAMC will count all full-time members of the family including live-in aides and foster persons who will reside in the unit. In addition, HAMC will count all anticipated persons including the following:

- Children expected to be born to a pregnant woman;
- Children in the process of being adopted by an adult family member;
- Children whose custody is being obtained by an adult family member;
- Children who are temporarily in a foster home who will return to the family;
- Children in joint custody arrangements who are present in the household 50% or more of the time;
- Children who are away at school and who live at home during recesses;
- Children that are temporarily in a correctional facility/detention center who will return to the family.

Property Standards for Behavior

The applicant family will be judged on past habits and practices related to tenancy and not on any attribute or behavior which may be imputed to a particular group or category of persons of which an applicant may be a member.

VI. Screening to Determine Applicant Eligibility

Applicant Screening Policy

All applicants for assisted housing will be screened according to the criteria set forth in HUD's Occupancy Handbook, HUD Handbook 4350.3 REV-1. Certain key questions relating to the applicant's eligibility and resident history will be asked, including Social Security numbers, and the names, addresses and telephone numbers of current and former landlords. Failure to provide this information will result in cessation of application processing. Property staff will assist applicants, as needed, in understanding the application process and completing forms. Applicants will be instructed on what aspects of their background will be checked. An applicant has the right to voluntarily withdraw from the application process at any time.

Live in Aids will be subject to the same general screening criteria as family members, except that Live-in Aids will not be screened for their ability to pay rent.

Things HAMC Will Check

- Past performance in meeting financial obligations, especially rent;
- A record of disturbance of neighbors, destruction of property, or housekeeping habits at prior residences which may adversely affect the health, safety or welfare of other residents, or cause damage to the unit or development;
- Involvement in criminal activity on the part of any applicant family member which would adversely affect the health, safety or welfare of other residents;
- A record of eviction from housing, or termination from residential programs;
- An applicant's ability and willingness to comply with the terms of HAMC' lease;

- An applicant's misrepresentation of any information related to eligibility, allowances, family composition or rent.

Things HAMC Will Not Check

- HAMC is not allowed to require physical examinations or medical testing as a condition of admission;
- HAMC will uniformly require all applicants to furnish evidence of ability to meet the obligations of tenancy, but will not impose greater burdens on persons with disabilities. Persons with disabilities may meet the requirements of the lease with the assistance of others such as attendant care providers;
- HAMC will not require a donation, contribution or membership fee as a condition of admission;

Procedures to Determine an Applicant's History

Past Performance

- Past performance for meeting financial obligations will be checked by contacting the current landlord and at least one prior landlord and utility supplier (if applicable).
- If verified records of timely rental payments (and utility payments, if applicable) are received from a landlord and/or utility supplier, no further documentation of past performance in meeting financial obligations, especially rent, will be collected.
- An applicant who applies owing a balance consisting of uncollected rent and/or miscellaneous charges may not be placed on the Waiting List until that balance is paid.
- HAMC will run a credit check and obtain a credit report on the applicant. In addition, HAMC will check court records for evidence of evictions or judgments against the applicant. The purpose of these checks is to obtain information on the applicant's past history of meeting financial obligations, future ability to make timely rent payments and to describe whether the applicant has ever been evicted from a rental unit.

If it is determined by the property manager that the applicant is not credit worthy, the applicant will be rejected.

- Also, HAMC will contact the current housing provider to determine the applicant's current lease compliance and ability to pay the rent in a timely manner.

Record of Disturbance

- HAMC will check with the current landlord and at least one former landlord for potential problems regarding documented disturbance of neighbors, destruction of property, or housekeeping habits that would pose a threat to the health and safety of other residents and/or property.
- In addition, HAMC may make a Home Visit to all eligible applicants that live within 20 miles of HAMC. For further information, see Page 24 of this Tenant Selection Plan.
- If the applicant is not currently living under a lease with a landlord, the current housing provider may be asked to verify the applicant's ability to comply with lease terms. Any area for which the applicant has upkeep responsibility will be inspected.
- Documentation of current use of illegal drugs on the part of any applicant family member will be sufficient grounds to reject the applicant family.

An applicant's behavior toward property staff will be considered in relation to future behavior toward neighbors. Physical or verbal abuse or threats by an applicant toward staff will be noted in the file and may be grounds for denial of residency.

Involvement in Criminal Activity

- Involvement in criminal activity by any member of an applicant family that would adversely affect the health, safety or welfare of other residents will be verified. In addition, the current or former landlord will be asked to indicate problems in this area during the applicant's tenancy.

Record of Eviction

- Staff will check property records, landlord records and other court records to determine whether the applicant has been evicted from any other property in the past.
- Record of termination from residential programs will be checked with police, service agencies and with any housing providers referred by the applicant.
- An applicant will in no way be held accountable by HAMC for the rental delinquency or other problems of a former household of which the applicant was a member, but not the head or spouse.
- Staff will consider the date and circumstances of any past eviction or termination of tenancy in determining its relevance to property tenancy.

Complying with the Lease

- If an applicant is able to document through landlord references that s/he is complying with lease terms in current residences, and has so in former residences, this criterion will be considered to have been satisfied. Ability to comply with HAMC lease terms will be checked only in the absence of satisfactory landlord's documentation.

Misrepresentation of Information

- If, during the course of processing an application, it becomes evident that an applicant has falsified or otherwise misrepresented any facts about his/her current situation, history, or behavior in a manner that would affect eligibility, applicant selection criteria qualification, allowances or rent, the application shall be rejected.

Review of Information

If HAMC's review of information about the applicant indicates that the applicant will not be a suitable resident, HAMC may reject the application for tenancy.

Screening for Credit History

HAMC will screen all applicants for their credit activity for the past 3 years. HAMC will reject an applicant for a credit history reflecting delinquencies on:

- Any utility bills and/or;
- Any previous monies owed from prior rental obligations

HAMC will not reject an applicant for a lack of a credit history.

Screening for Rental History

The applicant's rental history must be acceptable to HAMC's standards, which are as follows:

- Applicants should have at least one year of rental history to contact;
- The rental history of both the current landlord, and one previous landlord may be reviewed;
- If the applicant's current living arrangements are with a family member, then two previous landlords may be contacted;
- If an applicant's preceding housing was "owner occupied" this criterion is waived;
- Applicants must not have a history of more than four (4) late rental or mortgage payments;
- Applicants must show a willingness to maintain premises in a sanitary condition with no evidence of undesirable noise, odor, or disruptions to the quiet and peaceful enjoyment of other residents.

Screening for Housekeeping Habits

- All landlords contacted for rental history will also be questioned regarding the applicant's housekeeping habits, to determine the maintenance of the present home in regards to sanitary conditions, and fire and safety standards.

HAMC will deny admission if:

- Any household containing member(s) who was evicted in the last three (3) years from federally assisted housing for drug-related criminal activity. HAMC may, at its option, approve such an application, if the evicted household member has successfully completed an approved, supervised drug rehabilitation program; or the circumstances leading to the eviction no longer exist (e.g., the household member no longer resides with the applicant household)
- Any household member is currently engaging in illegal drug use;
- Any household member if there is reasonable cause to believe that member's behavior, from abuse or pattern of abuse of alcohol, may interfere with the health, safety, and right to peaceful enjoyment by other residents. The screening standards will be based upon behavior not the condition of alcoholism or alcohol abuse;
- Any household member has engaged in violent criminal activity;
- Any household member with a derogatory criminal (felony, misdemeanor, etc.) record less than three (3) years old that HAMC believes constitutes a threat to the health, safety, and rights to peaceful enjoyment of the property by residents, owners, employees, contractors, subcontractors, or agents of the owner."
- Non-violent felony (forgery, fraud, etc.) that is less than five (5) years from the date of the disposition.

Screening for Other Criminal Activity

HAMC will deny admission to any member of the household that is subject to a lifetime registration requirement under a state sex offender registration program. In accordance with Federal law, HAMC is establishing this standard to prohibit admission to this federally-assisted property to sex offenders subject to a lifetime registration requirement under a state sex offender registration program. During the admission screening process, HAMC will perform the necessary criminal history background checks in the state where the housing is located and in other states where the household members are known to have resided.

Violence Against Women Act (VAWA)

"Under The Violence Against Women Act ("VAWA"), criminal activity directly relating to domestic violence, dating violence, or stalking, engaged in by a member of a tenant's household or any guest or other person under the tenant's control, shall not be cause for denial of admission to HAMC if the tenant or an immediate member of the tenant's family is the victim or threatened victim of that abuse. However, nothing in the VAWA limits the authority of HAMC to deny admission to, or evict from, or terminate the assistance of, any applicant, tenant or lawful occupant if the HAMC can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property.

In addition, Sections 606 and 607 of VAWA allow HAMC to request in writing that an individual complete, sign and submit, within 14 business days of the request, a HUD-approved certification form. On the form, the individual certifies that he/she is a victim of domestic violence, dating violence, or stalking, and that the incident or incidences in question are bona fide incidences of such actual or threatened abuse. On the certification form, the individual shall provide the name of the perpetrator.

In lieu of a certification form, or in addition to the certification form, a tenant may provide to PHAs, managers or owners, (1) a Federal, State, tribal, territorial, or local police record or court record; (2) documentation signed and attested to by an employee, agent or volunteer of a victim service provider, an attorney or a medical professional, from whom the victim has sought assistance in addressing domestic violence, dating violence or stalking, or the effects of abuse, in which the professional attests under penalty of perjury (28 U.S.C. 1746) to the professional's belief that the incident or incidents in question are bona fide incidents of

abuse, and the victim of domestic violence, or stalking has signed or attested to the documentation. If the individual does not provide the form HUD - 50066 or the information that may be provided in lieu of the certification by the 14th business day or any extension of that date, none of the protections afforded to the victim of domestic violence, dating violence or stalking by sections 606 or 607 will apply. The PHA, owner or manager would therefore be free to evict, or to terminate assistance, in the circumstances authorized by otherwise applicable law and lease provisions, without regard to the amendments made by Sections 606 and 607.

HAMC, at its discretion, may provide assistance to an individual based solely upon the individual's statement or other corroborating evidence.

The Home Visit

- Applicants will be notified at least two days in advance of the scheduled home visit.
- Applicants who are sharing housing either with family members or friends must be advised that HAMC will inspect the common areas such as the living room, kitchen and bathroom of the unit, not just the applicant's room(s). A family that is willing to live in unsanitary or infested conditions created by others may have standards that are too low for admission.
- It is necessary to do a home visit to an institution, because the applicant may be responsible for some aspect of the condition of HAMC, and staff must make a determination whether the applicant would need services that, if provided by property staff, would constitute an alteration in the fundamental nature of HAMC' program.
- The purpose of the home visit is to determine whether the applicant is capable of caring for a unit in a way that will not create health or safety hazards or contribute to infestation, whether the applicant is likely to damage a unit, and whether the applicant is currently engaged in behavior or practices that would violate HAMC' lease.
- Resident-caused health or safety hazards, housekeeping that contributes to infestation or damage to the applicant's current unit would be grounds for rejection.
- Permitting unauthorized occupants to share the unit, engaging in criminal activity or presenting some other situation that was inconsistent with the information presented on the application, could be grounds for rejection. HAMC must be able to document any cases where the home visit results in a rejection.

OTHER STANDARDS

1. **Cars:** A maximum of two operational cars per unit (exceptions on 3-4 bedroom units). All motor vehicles must have current tags, inspection stickers and be registered with the office. All other vehicles are subject to tow.
2. **Pets:** If pets are allowed, an \$300.00 refundable deposit is required. No exotic pets are allowed. Dog breed restrictions: Rottweiler, Doberman pinscher, Pit Bull, Chow, and German shepherd. Refer to the community's "Rules for Pets". Approved assistance or service animals do not require additional deposits.
3. **Market Units:** Market units will need to earn an income of one and a half (1 ½) times the market rental amount.

VII. Marketing

Fair Housing Requirements

HAMC enforces a marketing effort that attracts a broad cross-section of the eligible population without regard to race, color, religion, sex, disability, familial status, national origin, marital status, sexual orientation, age, ancestry, source of income, medical condition, or any other arbitrary basis.

Filling Available Units

Whenever additional applicants are needed to fill available units, advertising will be carried out in accordance with the HUD-approved AFHMP for each site, and as indicated below.

Affirmative Fair Housing Marketing Plan (AFHMP)

HAMC complies with the requirements of the HUD-approved AFHMP established for HAMC, which is designed to promote equal housing choice for all prospective residents regardless of race, color, religion, sex, disability, familial status, national origin, marital status, sexual orientation, age, ancestry, source of income, medical condition, or any other arbitrary basis. The purpose of the plan is to ensure that eligible families of similar income levels will have a similar range of housing opportunities. The plan outlines marketing strategies HAMC will use. Special efforts will be made to attract persons who are least likely to apply due to such factors as the racial or ethnic composition of the neighborhood. Marketing will also seek to reach potential applicants outside the immediate neighborhood if marketing only within the neighborhood would create a disparate impact against certain classes, such as the case of an entire neighborhood that includes no minorities.

Special Marketing Requirements for Section 8 Units

HAMC will target its marketing and outreach activities for any Section 8 units to attract applicants with incomes below the very low-income limit. In addition, for income-targeting requirements, HAMC will target marketing and outreach to attract applicants with incomes at or below the extremely low-income limit to achieve the income-targeting requirements established on Page 9 of this plan.

Monitoring and Documenting Marketing Activities

HAMC will monitor marketing efforts and document the results in writing. The documentation will be made available, upon request, for all marketing activities to show consistency with affirmative fair housing marketing requirements and the approved plan for HAMC. This documentation will include copies of media and marketing materials, records of marketing activities conducted, and documentation of any special marketing activities conducted in accordance with the HAMC approved AFHMP.

Five-year Review of Plan

HAMC will review the AFHMP every five years and update it as needed to ensure compliance with HUD regulations. If the demographics of the area have changed, HAMC will determine whether advertising efforts should be targeted to different groups. The AFHMP will be revised whenever a substantial change takes place, or the local Consolidated Plan is updated, and be submitted to HUD for approval.

Advertising

Targeted Population

When available units cannot be filled from applicants on a waiting list, HAMC will target advertising to groups other than the typical population of the neighborhood, and will reach out to applicants who are least likely to apply because they are not the predominant racial or ethnic group in the neighborhood.

Form of Advertisement

All advertising for this property includes the HUD-approved Equal Housing Opportunity logo, the Equal Housing Opportunity slogan, or an equal housing statement. All advertising using human models will depict members of all eligible protected classes including individuals from both majority and minority groups.

Fair Housing Poster

HAMC has posted the required Equal Housing Opportunity poster in the Leasing Office, so that it is readily apparent to all persons seeking housing.

VIII. Application Intake and Processing

Application Intake

Online applications will be accepted at www.maricopahousing.org only when the waiting list is open. All communications with applicants will be by first class mail or by telephone. Failure to respond to letters or phone messages may result in withdrawal of an application from further processing. HAMC will make exceptions to these procedures to take into account circumstances beyond the applicant's control, such as medical emergencies or extreme weather conditions.

1. Application. Anyone who wishes to be admitted to an assisted property or placed on a property's waiting list must complete an application. In addition to providing applicants the opportunity to complete applications at the project site, owners may also send out and receive applications by mail. Owners shall accommodate persons with disabilities who, as a result of their disabilities, cannot utilize the owner's preferred application process by providing alternative methods of taking applications.
2. Applicant certification. The application must include a signature from the applicant certifying the accuracy and completeness of information provided.
3. *Supplemental Information to Application for Assistance. The application must include as an attachment, form HUD-92006, Supplement to Application for Federally Assisted Housing.
4. The applicant provides self-certification of their race and ethnicity for data collection by using form HUD-27061-H. Completing this form is optional and there is no penalty for not completing it. Owners should not complete the form on behalf of the tenant. When the applicant chooses not to self certify race or ethnicity, a notation that the applicant chose not to

Contents of Application

Full written applications will be required as applicants who applied online are pulled from the wait list. Every application must be completed and signed by the applicant. The information requested on the application form includes:

- Household characteristics such as name, sex, age, disability status (only where necessary to establish eligibility), need for an accessible unit, and race/ethnicity;
- General household contact information such as address, phone number, etc.;
- Sources and estimates of the household's anticipated annual income and assets;
- Social Security number(s);
- Citizenship declaration and consent form(s);
- Higher education student status (only if a member of the household is a student in higher education);
- Identification of preferences for which the household qualifies
- Screening information, which may include prior landlord, credit, and drug/criminal history;
- Marketing information regarding how the applicant heard about HAMC; and
- Certification from the applicant stating the accuracy and completeness of information provided, and an acknowledgement that the applicant has read the Privacy Act and understands the disclosure requirements received including Tenant Selection Plan (TSP), EIV and You Brochure.
- Authorization by the applicant that allows HAMC to verify all information provided on the rental application.
- Inquiry of State Lifetime Sex Offender Registration in any state.
- Listing of states where applicant has resided.
- Dated and signed HUD Form 92006 Certification-Supplement to Application for Federally Assisted Housing

Staff will be prepared to assist any applicants who might have trouble completing the application form. This assistance might take the form of answering questions about the application, helping applicants who might have

literacy, vision or language problems and, in general, making it possible for interested parties to apply for assisted housing.

Determining an Applicant's Eligibility

Preliminary Determination

Before putting any applicant on a waiting list, HAMC will make a preliminary eligibility determination to ensure that there are no obvious factors that would make an applicant ineligible.

Placement on a Waiting List

If a preliminary screening indicates that a family is eligible for tenancy, but units of appropriate size are not vacant, HAMC will place the family on a Waiting List according to the date and time the application was received in the rental office if requested by the family. The family will be notified when a suitable unit becomes available.

Placement on More than One List

Families may request and be placed on more than one waiting list, as long as they are eligible for the appropriate bedroom size. For instance, a family of 3 that includes a parent and a son and daughter is eligible for both a 2-bedroom unit and a 3-bedroom unit. (where applicable).

For more information on Waiting List Management, see Page 29 of this Tenant Selection Plan

Updating Information

Applicants have the opportunity, at any time, to supplement the information they already provided with their application.

Verification Interview

As applicants approach the top of the waiting list they will be contacted to schedule an interview to verify all information given on the application. The interview will be conducted in accordance with HUD's Occupancy Handbook, HUD Handbook 4350.3 REV-1. HAMC will confirm and update all information provided on the application, and will explain program requirements, verification procedures, and penalties for false information, which include eviction, loss of assistance, fines up to \$10,000, and imprisonment up to five years. The applicant will be asked to sign the release of information consent portion of the Authorization for Release of Information (Forms HUD 9887 and 9887-A) and any other necessary verification requests.

Ineligible Applicants

At the completion of the verification process, applicants will be ineligible to move into HAMC for any one of the following reasons:

- The applicant's gross annual income changes by the time they reach the top of the waiting list, and exceeds the income limit for HAMC;
- Household members have failed to meet disclosure requirements for Social Security numbers;
- Household members have failed to declare citizenship/non-citizenship status;
- Household members have failed to sign the release of information forms; and,
- Landlord reference checks reveal that the applicant has a history of nonpayment of rent, eviction for nonpayment of rent, history of disruptive behavior, or history of damaging site property.

IX. Waiting List Management

Anyone who wishes to be admitted to HAMC or to be placed on HAMC Waiting List must complete an application. The application must include a signature certifying the accuracy and completeness of information provided. If the

applicant is placed on HAMC' Waiting List, the list will note the name of the applicant, the date and time of application, the type of income, the size of unit desired, and any other pertinent information.

Selecting Names from the Waiting List

HAMC will select names from the waiting list in chronological order to fill vacancies, unless an extremely low-income applicant is needed to achieve targeting requirements, and the next applicant on the waiting list has income above the extremely low-income limit. In such a case, a notation will be made on the waiting list to indicate why this applicant was skipped for an extremely low-income applicant. Please note the paragraph on Income-Targeting on Page 9 of this Tenant Selection Plan.

Applicant's Refusal to Accept a Unit

When appropriately sized units are offered to applicants, and an applicant rejects a unit offer two consecutive times, the applicant will be placed at the bottom of the Waiting List.

Maintaining the Waiting List

In order to maintain a balanced application pool, HAMC may, at its discretion, restrict application taking, suspend application taking, and close waiting lists in whole or in part. Decisions about closing the waiting list will be based on the number of applications available, and the ability of HAMC to house an applicant within a reasonable period of time. Closing the waiting lists, restricting intake, or opening the waiting lists will be publicly announced on the Agency's Website (www.maricopahousing.org) and in The Republic (local newspaper).

Policy for Closing the List

The waiting list will be closed when the average wait is one year or more. Potential tenants whose names appear on the waiting list will be notified via mail of the closure of the waiting list. The waiting list closure will also be published in the newspaper(s) listed above, and will state that additional applications will not be accepted until the waiting list is no longer excessive. During the period when the waiting list is closed, HAMC will not maintain a list of individuals who wish to be notified when the waiting list is reopened.

Reopening the List

If there is a need to reopen the waiting list, HAMC will advertise in the newspapers listed above, HAMC's website and the applicable agency identified in the applicable AFHMP, explaining the rules for applying, when and where to apply, and the order in which applications will be processed.

Updating the Waiting List

The Waiting List will be updated annually. Applicants must respond to the annual update to remain on the Waiting List. HAMC will update the waiting list by removing the names of those who are no longer interested in, or who are no longer qualified for, assisted housing. The applicant is responsible to update the application with any changes that may occur to remain active on the current waiting list.

Removal of Applications from the Waiting List

HAMC will not remove an applicant's name from the waiting list unless:

- The applicant requests that the name be removed.
- The applicant was clearly advised of the requirement to tell HAMC of his/her continued interest in housing by a particular time and failed to do so. Those applicants failing to respond within the required time frame will be removed from the list.
- They may reapply during open enrollment, but will not assume their old position on the list.
- HAMC made a reasonable effort to contact the applicant to determine if there is continued interest in housing, but has been unsuccessful.
- HAMC have notified the applicant of its intention to remove their name because they no longer qualify for assisted housing.

When an application is rejected by management, the applicant will be provided a brief description of the reason(s) for the determination in writing. The applicant will have 124 days to respond in writing or request a

meeting to discuss the rejection. The meeting will be held by management with a reasonable time and is to be held by a member of management that was not a party or the decision to reject. After the meeting, the applicant must be notified in writing within five (5) calendar days whether the original decision has been changed.

X. Verification Requirements

Required Consent Forms

Adult members of assisted families must authorize owners to request independent verification of data required for program participation. To provide owners with this authorization, adult family members must sign two HUD-required consent forms, plus HAMC' specialized verification forms.

Form HUD-9887, Notice and Consent to the Release of Information to HUD.

Each member of the family who is 18 years of age and older must sign this form regardless of whether s/he has income. The consent allows HUD to verify information with the IRS, the Social Security Administration, and with state agencies that maintain wage and unemployment claim information.

Form HUD 9887-A, Applicant's/Tenant's Consent to Release of Information – Verification by Owners of Information Supplied by Individuals Who Apply for Housing Assistance.

Owners and all family members 18 years of age and older, regardless of whether they have income, must sign this form. The consent allows owners to request and receive information from third-party sources about the applicant/resident.

Required Information

All information relative to the following items must be verified:

- Income, assets, family composition, and Social Security numbers;
- Deductions for such things as age, disability, disability expenses, and medical costs;
- Documented ability and willingness to abide by lease requirements, previous history of tenancy, rent paying, caring for a home, and criminal activity of any family member.

All of the above information must be documented, and appropriate verification forms or letters placed in the applicant or resident file. No decision to accept or reject an application will be made until all verifications have been collected.

Verification Documentation

Documentation used as part of the verification process may include:

- Checklists completed as part of the interview process and signed by the applicant;
- Verification forms completed and signed by third parties;
- Reports/letters of interviews; and
- Notes of telephone conversations with reliable sources.

At a minimum, such reports will indicate the date of the conversation, source of the information, name and job title of the individual contacted, and a written summary of the information received. Management staff will be the final judge of the credibility of any verification submitted by an applicant. If a staff member considers documentation to be doubtful, HAMC manager/owner will review it before making a ruling about its acceptability. Staff will continue to pursue credible documentation until it is obtained or the applicant is rejected for failing to produce it.

Preferred Forms of Verification

Verifications shall be attempted in the following order:

- Third party written;
- Third party oral with a record kept in the file;
- Review of documents provided by the family, or affidavits from the family.

Each file will be documented to show that HAMC staff attempted to obtain third party written documentation before relying on some less acceptable form of information.

Source of Information

Sources of information to be checked may include, but are not limited to:

- Present and former landlords, or housing providers;
- Present and former employers;
- Credit checks and landlord record services;
- Family social workers, parole officers, court records, drug treatment centers, clinics, physicians, clergy; &
- Police departments.

Verifications and Rent Computations

Annual Income, which is used to determine eligibility, and Adjusted Income, which is the income upon which the rent is based, will be computed in accordance with the definitions and procedures established in Federal Law and set forth in the applicable HUD regulations, as found in HUD Handbook 4350.3 REV-1.

Verifying Annual Income

Projections of Annual Income will include estimates for each income recipient, and will be based on the best available information, considering the past year's gross income, and for employed families, the current income rate, and any potential rate increase, bonus, or possibility of overtime. The income of irregular workers will be estimated on the basis of the best information available, considering earning ability and work history. Overtime income will be computed in accordance with verification obtained from the employer, in the absence of more reliable or accurate information.

Methods of Verifying Income

Income is the most important factor in determining a family's eligibility and rent. HAMC has established methods of verifying income which include:

- Written third party verification (with an appropriate release) through an employer or public agency. Property staff may update this verification by phone provided a memorandum to the file is prepared.
- Property review of documentation provided by the family such as benefit checks, income tax returns, and W-2 forms.

In the absence of any of the above, affidavits from the family describing the amount and type of income is acceptable documentation.

Verifying Zero Income

If an applicant reports zero income, HAMC will advise her/him that if they are still at zero income when they become a resident, they will be asked to complete a questionnaire prepared by HAMC stating their source of necessary living items that are not covered by Food Stamps or other federal assistance sources. After 90 days at zero income, and for every 90-day period thereafter, the resident will be re-certified to determine if they have begun to receive any type of income. If a resident goes through four 90-day periods at zero income, HAMC will then make a visit to their dwelling unit to determine the likelihood of the resident's report. If the resident is found to have a car, a telephone, cable television, cigarettes, disposable diapers, or other evidence of some form of income, the applicant will be asked to explain the source of income supporting cash expenditures when zero income is present. A Family Budget or Statement of Financial Responsibility may be required from the applicant. Investigations may include ordering a credit report on the resident after proper notice is given.

Attempted Fraud

Any information provided by the applicant that verification proves to be untrue may be used to disqualify the applicant for admission on the basis of attempted fraud. HAMC considers false information about the following items to be grounds for rejecting an applicant:

- Income, assets, family composition; Social Security numbers; allowances; and
- Previous resident or criminal history

Unwitting errors that do not secure an advantage with regard to program eligibility, preferences, or rent will not be used as a basis to exclude applicants.

XI. Making an Occupancy Determination

Non-Discrimination

The following list of factors will not be considered in making a decision to admit or reject an application:

- Race
- Color
- Religion
- Ancestry
- National origin
- Age
- Sex
- Marital status
- Familial status
- Sexual orientation
- Medical condition
- Source of income
- Handicap or disability, including mental or psychological illness

Applicants with Disabilities

It is illegal to reject an applicant because s/he has a disability, or for reasons that could be overcome by HAMC's reasonable accommodation of the applicant's disability. If, even with a reasonable accommodation, applicants with disabilities cannot meet essential program requirements, it is permissible to reject them. Such insurmountable problems might arise because of behavior or performance in past housing, inability to comply with the terms of HAMC's lease, or needed services from property staff that represent an alteration in the fundamental nature of HAMC program or is economically unreasonable.

Determining Program Eligibility

An applicant who happens to have a disability but who is able to demonstrate a history of meeting financial obligations, caring for a rental unit, avoiding disturbing neighbors and destroying property, eschewing criminal behavior, and if necessary, ability to comply with HAMC's lease, would be recommended for admission with no further reference to or consideration of any disability or handicap.

Recommendations for Admission or Rejection

If at any point in the screening process (including landlord references, home visit, criminal background check, or verification of ability to comply with lease terms), it becomes clear to HAMC that an applicant will not meet the screening criteria, the file will be sent to the appropriate Supervisor for review. The first step in this review is a determination of the file's completeness. If any information is missing or the case for rejection or acceptance is not compelling, the file will be returned to the staff for further work.

Authorizing Admission

If an applicant is clearly eligible and passes the screening criteria, admission will be authorized.

Authorizing Rejection

Likewise, if the applicant is ineligible, rejection will be authorized. See Page 35 of this plan for further requirements regarding rejection.

XII. Rejection of Ineligible Applicants

Applicants who do not pass the eligibility requirements will immediately be sent a letter of rejection. This written rejection notice will specifically state one of the reasons listed below for the rejection, and will inform the applicant of her/his right to respond to HAMC in writing, or to request a meeting within 14 days to dispute the rejection.

Reasons for Rejection

HAMC will reject an applicant if s/he:

- Is ineligible for occupancy based on HUD's guidelines as indicated in HUD Handbook 4350.3 REV-1;
- Is unable to disclose and document a SSN, or does not execute a certification stating that no SSN has been assigned;
- Does not sign and submit verification consent forms or the Authorization for Release of Information (Forms HUD-9887 and HUD-9887-A);
- Has household characteristics that are not appropriate for the unit sizes that are available;
- Has not declared citizenship or non-citizenship status, or signed a statement electing not to contend noncitizen status; or
- Does not meet HAMC' resident screening criteria as set forth in this Tenant Selection Plan. If this item is the cause for rejection, the letter of rejection will specifically state in which area the applicant did not pass the screening criteria, as indicated below.

Failing the Screening Criteria

Reasons for failing HAMC' resident screening criteria may include but not limited to:

- A family member was, or is, engaged in criminal activity that involves crimes or physical violence to persons or property, or that disturbs the peaceful enjoyment of the premises;
- There is evidence of acts of violence or any other conduct that constitutes a danger or disruption to the peaceful enjoyment of the premises;
- There is confirmed drug addiction or alcohol abuse, such as a conviction for possession, trafficking or use of narcotics or controlled substances, a record of conviction for activity relating to the misuse of alcohol, or written reports from a probation officer, a social agency, or the family itself to the effect that the individual is addicted to, or is misusing drugs or alcohol;
- A family member was evicted in the past three (3) years from federally-assisted housing for drug and criminal activity;
- A family member has been evicted from a residence within 5 years, evictions after five years: member must establish positive rental history (no other eviction and no late rental payments made) and paid prior eviction in full;
- A family member has a conviction for the offense of rape, prostitution, indecent exposure, sodomy, carnal abuse, impairing the morals of a minor or similar crimes indicating sexual deviation;
- Any outstanding utility bills
- There is evidence of grossly unsanitary or hazardous housekeeping habits, which includes the creation of health or safety hazards through acts of neglect, or causing, or permitting to cause any damage to or misuse of the premises. This includes causing or permitting infestation, foul odors or other problems injurious to other persons' health, welfare or enjoyment of the premises; depositing garbage improperly; failing to use in a reasonable and proper manner all utilities, facilities, services, appliances and equipment within the dwelling unit, or failing to maintain them in good and clean condition; or any other conduct or neglect which could result in health or safety problems or in damage to the premises.

Report from Qualified Agency

In cases where a qualified agency, such as Protective Services, reports that a family shows potential for improvement in the area of housekeeping, an eligibility decision will be reached after receiving such a referral or recommendation from such an agency.

Appeal Process

All denied applicants have 14 days to respond in writing or to request a meeting to discuss their rejection. Appeal letters should be sent to the address on the cover page of this Tenant Selection Plan. A member of HAMC staff who was not involved in the initial decision to deny admission will conduct a meeting with the applicant. A written response will be sent to the applicant within 5 days following the review meeting with the final decision.

XIII. Acceptance of Eligible Applicants

Offering a Unit

When a unit becomes available for occupancy, it will be offered either to the first Extremely Low-income applicant on the Waiting List, or, if the income-targeting percentage has already been met, to the first applicant at the top of the Waiting List. If the applicant cannot be contacted within five (5) working days, the offer will be canceled and the unit will be offered to the next applicant on the Waiting List. In that event, the first applicant will be sent a letter requesting confirmation of their interest in remaining on the Waiting List. If the applicant replies affirmatively, their application will retain its position on the Waiting List. The applicant will be advised at that time that if another unit becomes available and they cannot be reached within five (5) working days, their name will be moved to the bottom of the waiting list. If the applicant's reply is negative, or if no reply is received within five (5) working days, the application will be withdrawn and removed from the wait list.

Preparing to Move In

- The applicant and site manager or his/her designee will inspect the unit, and will both sign the Move-In Inspection Form;
- All applicants will sign the lease and related documents;
- The applicant will pay the security deposit by bank check, cashier's check or money order;
- The applicant will pay the pet deposit (if applicable) by bank check, cashier's check or money order; (no deposit will be required for the assistive or service animal of a disabled applicant or resident)
- The applicant will pay the rent for the first month or partial month of occupancy by personal check, bank check, cashier's check or money order;
- The applicant will be given a copy of the lease, the HUD-50059 Form used to certify the rent, the Initial Notice for next year's Annual Recertification, the Move-In Inspection Form, House Rules, Pet Rules (if applicable), a *Resident Rights and Responsibilities* brochure, the Lead-Based Paint Disclosure Form, a HUD Fact Sheet describing the program and how HAMC determined the rent, and the receipt for the security deposit and first month's rent.

Move-In Inspection

Before executing the lease the HAMC representative and the resident will jointly inspect the unit. The move-in inspection form will be used to indicate the condition of the unit. The condition of the unit must be decent, safe, sanitary, and in good repair. If cleaning or repair is required, HAMC will specify on the form the date by which the work will be completed, which will be no later than 30 days after the effective date of the lease. After the move-in inspection, the resident has five (5) days to report any additional deficiencies in the unit to management. The complete move-in inspection will be attached to the lease. The inspection form must be signed and dated by both HAMC and the resident.

Initial and Renewal Leases

Applicants will be required to sign a lease for the program under which they are being admitted, in accordance with Figure 6-2 of HUD's occupancy handbook, HUD Handbook 4350.3 REV-1. The initial lease term and any renewal lease terms will be determined in accordance with Figure 6-4 of the handbook.

Determination of Security Deposit

Security deposit amounts will be determined in accordance with Figure 6-7 of HUD's occupancy handbook, HUD Handbook 4350.3 REV-1, which is equal to the greater of \$50 or the household's total tenant payment at move-in.

Pet Deposit (if applicable)

Pet deposit amounts will be determined in accordance with Figure 6-8 of HUD's occupancy handbook, HUD Handbook 4350.3 REV-1. The pet deposit is \$300. No deposit will be required for the assistive animal of a disabled applicant.

Rent Calculation

Monthly rent will be determined in accordance with the resident rent formulas indicated in Exhibit 5-8 of HUD's occupancy handbook, HUD Handbook 4350.3 REV-1.

Failure to Move In on Time

If an applicant fails to move in on the agreed date, the applicant will be contacted to determine if extenuating circumstances exist. If HAMC determines that extenuating circumstances do exist, and the applicant cannot immediately move into HAMC, the application will be returned to its current spot on the waiting list, and the unit will be offered to the next household on the Waiting List. If HAMC does not find that there are extenuating circumstances, the application will be withdrawn.

Charges for Facilities and Services**Checks Returned for Insufficient Funds**

HAMC will impose a fee on the second time, and each additional time, a check is not honored for payment. In addition, the resident will be billed for the amount the bank charges for processing the returned check.

Damages

Whenever damage is caused by carelessness, misuse, or neglect on the part of the resident, household member, or visitor, the resident is obligated to reimburse HAMC for the damages within 30 days after the resident receives a bill from HAMC. HAMC will deduct accrued, unpaid damage charges from the resident's security deposit at the time of move-out, as allowed by the laws of this state.

Special Management Services

HAMC will charge for special services such as responding to lockout calls and providing extra keys. At the time of move-out HAMC will charge the resident for each key not returned.

Court Filing, Attorney, and Sheriff Fees

HAMC will accept fees from residents who wish to avoid or settle an eviction suit as permitted by state and local laws.

Annual Unit inspections After Move-In

In addition to the unit inspection at move-in, there will also be annual inspections for repairs and monitoring of housekeeping habits. If a resident is written up for poor housekeeping habits, s/he must clean their unit within ten (10) days for a re-inspection. If a resident has three (3) unsatisfactory inspections, s/he will be required to move out of the property in accordance and upon notification of Termination of Tenancy.

House Rules

HAMC has House Rules that are attached to the Lease. These rules are reviewed annually and may be modified. Residents will be notified of any modifications to the House Rules 30 days before they become effective. All residents will be given the opportunity to accept the changes in writing. If a resident chooses to reject any House Rule changes, s/he will be required to move out of HAMC within 60 days.

XIV. Resident Responsibilities After Move-In

Annual Recertification Requirements

Once a resident has moved into assisted housing and has gone through the process of having his/her income, assets, and allowances verified, HUD requires HAMC to go through that same process of certification on an annual basis to ensure residents are paying rent based on their ability to pay. This system of annually re-verifying income is called Annual Recertification.

Per the HUD Handbook 4350.3 REV.1, owners/management agents are allowed to conduct criminal background checks as part of the recertification process. HAMC will be administering criminal background checks during annual recertification. If any criminal activities have been found (see page 21 and 22) HAMC will require the household to move out within 30 days or elect to not renew their lease due to unfavorable criminal activity.

HAMC will initiate the annual recertification process by first notifying the resident at the signing of each lease of their obligation to recertify next year. One hundred and twenty (120) days before the new recertification effective date, HAMC will send a reminder notification of their need to report for an Annual Recertification. The resident is then obligated to respond to these notices by reporting to HAMC at the requested time, to complete the recertification process. If the resident does not respond or has not started the recertification process within 60 days prior to his/her recertification date, the resident has waived his/her right to a thirty day notice of rent increase and HAMC may terminate tenancy due to noncompliance.

Interim Recertification Requirements

If circumstances occur in a resident's life that affect his/her ability to pay their rent, a recertification of income, assets, allowances, or household composition should take place before the next scheduled annual recertification is due. This action is called an Interim Recertification. Owners and residents both have certain responsibilities under HUD regulations to initiate interim re-certifications to ensure that an assisted resident continues to pay rent according to his/her ability to pay.

Owner Responsibility

HAMC will process interim re-certifications when the resident reports circumstances which would decrease the rent, as indicated in Chapter 7 of HUD's occupancy handbook, HUD Handbook 4350.3 REV-1.

Resident Responsibility

If an assisted resident experiences certain changes in their income or household composition at a time other than their scheduled annual recertification, HUD requires them to immediately report these changes to HAMC, so that an interim recertification can be processed, as listed in Paragraph 16 of the Model Lease.

Unit Transfer Policy

When a resident reports a change in the number of household members, or a change in the household composition, HAMC will determine if the current unit is still appropriate for the new household. To make this determination HAMC will rely on the occupancy standards implemented for HAMC on Page 18 of this Tenant Selection Plan.

HAMC will determine if there is an appropriately sized unit in HAMC, and if there is a market for the size of unit the resident would be vacating. For more information on Unit Transfers, go to Page 19 of this Tenant Selection Plan.

Implementation of House Rules

The house rules in effect at this property are in place to ensure the safety, care, and cleanliness of the building, and the safety and comfort of the residents. They are in compliance with HUD, state and local requirements, and

do not discriminate against individuals based upon membership in a protected class. HAMC will give residents a written 30-day notice prior to implementing any new house rules.

XV. Termination

Termination of Assistance

HAMC will terminate a resident's assistance if:

- The resident fails to provide required information at the time of recertification, including changes in family composition, or changes in income or Social Security numbers for new family members;
- The resident fails to sign/submit required consent and verification forms (HUD-9887 and HUD-9887a);
- An annual or interim recertification determines that the resident has an increased ability to pay the full contract rent;
- The resident fails to move to a different-sized unit within 30 days after HAMC notifies him/her that a transfer is required, and that the unit of the required size is available;
- The resident has begun receiving assistance, HAMC is unable to establish citizenship or eligible immigration status for any family members from the information provided by the resident, and determines that the resident does not meet the citizenship requirement;
- Actions to terminate assistance will be based only on a change in the resident's eligibility for assistance or a resident's failure to fulfill specific responsibilities under program requirements.
- A student enrolled at an institution of higher education does not meet the eligibility requirements for Section 8 assistance
- The resident does not sign the required HUD-50059 or HUD-50059a form.

Termination of Tenancy by Owner

Grounds for Termination of Tenancy

Owners are expected to enforce program requirements under the terms of the lease. Similarly, HUD expects tenants to comply with the program requirements as established in the lease. HAMC will enforce the lease and house rules, and if lease obligations are not fulfilled, HAMC will initiate termination proceedings to guarantee the other residents' health, safety, and peaceful enjoyment of the property. Termination of tenancy is the first step in the eviction process and is often used interchangeable with the term eviction. When terminating tenancy, the owner gives the resident notice to vacate the unit because of a lease violation(s). A resident who fails to vacate the unit after receiving notice from the owner may face judicial action initiated by the owner to evict the resident. The owner may only terminate tenancy for Material Non-compliance, Criminal Activity, Failure to Carry Out Obligations under Arizona Landlord Tenant Law and Other Good Cause.

Material Non-Compliance

Owners may terminate tenancy when a resident is in material non-compliance with the lease. Material Non-Compliance includes:

- Failure of the resident to submit, in time, all required information on household income and composition (example: evidence of citizenship, or eligible immigration status; disclosing and verifying social security numbers; or signing and submitting consent forms allowing verification of information regarding the resident's income and eligibility)
- The Resident knowingly providing incomplete or inaccurate information
- Extended absence or abandonment of the unit as defined in the house rules for the property, or in state or local law
- Fraud, which is when a resident knowingly provides inaccurate or incomplete information, either at the time or move in or after the residency has been established
- Repeated minor violations that: Disrupt the livability of the property; adversely affect the health or safety of any person, or the right of any resident to the peaceful enjoyment of the property; Interfere with the management of the property, or have an adverse financial effect on the property
- Nonpayment of rent due under the lease, or repayment agreement, including any portion thereof.

Criminal Activity

Owners may terminate residency and evict residents for criminal activity by a covered person (a resident, household member, guest, or other person un the resident's control) if they determine that the covered person has engaged in the criminal activity, regardless of whether the covered person has been arrested or convicted for such activity and without satisfying a criminal conviction standard or proof of the activity. HAMC may terminate tenancy for any of the following types of criminal activity by a covered person:

- Any criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents (including property management staff resident on the premises; or
- Illegal drug use. HAMC may evict a family if it is determined that a household member is illegally using a drug or when owners determine that a pattern of illegal use of a drug interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents.
- Alcohol abuse. HAMC may terminate tenancy if it is determined that a household member's abuse or pattern of abuse of alcohol threatens the health, safety, or right to peaceful enjoyment of the premises by other residents.
- Fleeing to avoid prosecution, or custody or confinement after conviction for a crime, or attempting to commit a crime that is a felony under the laws of the place from which the individual flees, or that, in the case of the State of New Jersey, is a high misdemeanor; or
- Violating a condition of probation or parole imposed under federal or state law

Failure to Carry Out Obligations Under Arizona Landlord Tenant Law

HAMC may terminate tenancy if the resident fails to comply with State and Local laws regulating the tenancy.

Other Good Cause

Other Good Cause includes: Resident refusal to accept an approved modification of the lease

Termination Notice

When an owner terminates tenancy, written notice must be provided to the resident. The notice must reflect the following:

- State the reason for the action with enough detail to enable the resident to prepare a defense;
- Advise the resident that remaining in the unit on the termination date specified in the notice may result in the owner seeking to enforce the termination in court, at which time the resident may present a defense;
- Advise the resident that s/he has 10 days within which to discuss termination of tenancy with the Owner
- When the terminating tenancy for material noncompliance, criminal activity, and failure to comply with state and local landlord tenant laws, the length of the notice period is determined by Arizona Law, which provides for a minimum of three (3) days notice. Notices based upon Other Good Cause must be a minimum of thirty (30) days.

Termination of Tenancy by Resident

In order to terminate tenancy, the resident must provide HAMC with a written 30-day notice to vacate the unit, as required in the lease.

XVII. Income Limits

FY 2017 INCOME LIMITS MARICOPA COUNTY

Very Low (50%) Income Limits (\$)

1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
\$23,200	\$26,500	\$29,800	\$33,100	\$35,750	\$38,400	\$41,050	\$43,700

Extremely Low (30%) Income Limits (\$)

1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
\$13,900	\$16,240	\$20,420	\$24,600	\$28,780	\$32,960	\$37,140	\$41,320

Low (80%) Income Limits (\$)

1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
\$37,100	\$42,400	\$47,700	\$52,950	\$57,200	\$61,450	\$65,700	\$69,900

EIV Use and Security Policy

Purpose:

The purpose of this policy is to provide instruction and information to staff, auditors, consultants, contractors and tenants on the acceptable use, disposition and storage of data obtained through EIV (Enterprise Income Verification System).

The purpose of EIV is to assist the HUD, Contract Administrators, owners and their agents in streamlining the income verification process and to help in minimizing the need for 3rd party verification. EIV allows the user to identify:

- Applicants currently receiving HUD assistance
- Income not previously reported
- New employment
- Historical patterns of earnings and received income
- Multi-subsidy for household members included in both PIC and TRACS databases
- Deceased household member(s)

In addition, information in EIV can be used to provide more comprehensive oversight to compliance policies and their implementation. The data provided via EIV system will be protected to ensure that it is only used for official purposes and not disclosed in any way that would violate the privacy of the individuals represented in the system data. Privacy of data and data security for computer systems are covered by a variety of federal laws and regulations, government bulletins, and other guiding documents.

Safeguarding EIV Data

The information processed by any EIV system can include wage and income data about private individuals, as well as identifying information such as Social Security Number, Address, and Employment information. This policy describes methods to comply with HUD's required EIV safeguards.

Technical safeguards

1. Reduce the risk of a security violation related to the EIV system's software, network, or applications.
2. Identify and authenticate all users seeking to use the EIV system data.
3. Deter and detect attempts to access the system without authorization.
4. Monitor the user activity on the EIV system.

Administrative safeguards

1. Ensure that access rights, roles, and responsibilities are appropriately and adequately assigned.
2. Protect copies of sensitive data and destroy system-related records to prevent reconstruction of the contents.
3. Ensure authorized release of tenant information consent forms are included in all family files, before accessing and using data.
4. Maintain, communicate, and enforce standard operating procedures related to securing EIV data.

EIV Use and Security Policy

5. Train staff on security measures and awareness, preventing the unauthorized accessibility and use of data.

Physical safeguards

1. Establish barriers between unauthorized persons and documents or computer media containing private data.
2. Clearly identify restricted areas by use of prominently posted signs or other indicators.
3. Develop a list of authorized users who can access restricted areas-e.g., contractors, maintenance, and janitorial/cleaning staff.
4. Prevent undetected entry into protected areas and/or documents.
5. Notify Coordinators/Security Administrators of system breaches and penetration by unauthorized users.

Designated staff will have the responsibility of ensuring compliance with the security policies and procedures outlined in this document. These responsibilities include:

- Maintaining and enforcing the security procedures
- Keeping records and monitoring security issues
- Communicating security information and requirements to appropriate personnel including coordinating and conducting security awareness training sessions
- Conducting review of all User ID's issued to determine if the users still have a valid need to access EIV data and taking necessary steps to ensure that access rights are revoked or modified as appropriate
- Reporting any evidence of unauthorized access or known security breaches to designated staff and taking immediate action to address the impact of the breach including but not limited to prompt notification to designated staff. Designated staff will escalate the incident by reporting to appropriate parties including the Contract Administrator or HUD.

Limiting Access to EIV Data

User accounts for the EIV system will be provided on a need-to-know basis, with appropriate approval and authorization.

Security Awareness Training

Security awareness training is a crucial aspect of ensuring the security of the EIV System and data. Users and potential users will be made aware of the importance of respecting the privacy of data, following established procedures to maintain privacy and security, and notifying management in the event of a security or privacy violation. Before granting access to the EIV information, each person must be trained in EIV Security policies and procedures. Additionally, all employees having access to EIV Data will be briefed at least annually on the security policy and procedures that require their awareness and compliance. Information about user access and training will be maintained in the property EIV file. See Appendix B.

EIV System Coordinators

Before accessing EIV, the Secure Systems Coordinators will obtain a letter from each property owner indicating that the owner gives permission for the Secure Systems Coordinator to act as

EIV Use and Security Policy

the EIV coordinator. Once that permission is obtained, the Coordinator will review the EIV training material provided by HUD and complete the appropriate Security Awareness Training Questionnaire and review the EIV Security Policy and the EIV User Policy. Upon completion of these three tasks, the EIV Coordinator will submit, to HUD, the appropriate Coordinator Access Authorization Forms. Upon receipt of HUD approval, the EIV Coordinator will complete the EIV Coordinator setup process.

EIV Users

Before requesting EIV User access, appropriate staff will review the EIV training material provided by HUD and complete the appropriate Security Awareness Training Questionnaire and review the EIV Security Policy and the EIV User Policy. Upon completion of these three tasks, the EIV User will submit, to the EIV Coordinator, the appropriate User Access Authorization Form. Upon receipt the EIV Coordinator will review the completed Security Awareness Training Questionnaire for accuracy and recommend further training if necessary. If the EIV Coordinator feels that the EIV User candidate does not understand the security requirements, the EIV Coordinator will not continue with the EIV setup for that user.

Note: Under no circumstances will the EIV Coordinator process the User Access Authorization Form unless the executed Security Awareness Training Questionnaire, the signed EIV Security Policy and the signed EIV User Policy are attached.

Once the user request information is satisfactorily completed, the EIV Coordinator will complete the appropriate steps to provide EIV access to the user. In accordance with HUD requirements, the user's need for access will be reviewed on a quarterly basis.

At least once a year, staff with EIV access will be required to:

- Participate in training that includes a review of the EIV security policy and
- Complete the EIV Security Awareness Training Questionnaire

The owner/agent will restrict access to EIV data only to persons whose duties or responsibilities require access. EIV Coordinators will be required to request re-certification on an annual basis. EIV Coordinators are authorized to provide access only to those individuals directly involved in the resident certification process and/or compliance monitoring. EIV Coordinators will carefully review initial and quarterly requests for access and certify only those users who will need access within the next 90 days.

The owner/agent will maintain a record of users who have approved access to EIV data. Further, **the owner/agent** will revoke (Expire) the access rights of those users who no longer require such access or modify the access rights if a change in the user's duties or responsibilities indicates a change in the current level of privilege.

The owner/agent will assure that a copy of Form-9887 and Form 9887-A has been signed by each member of the household age 18 years or older. The 9887 will be presented at move-in and/or initial certification. If a household member turns 18 in the middle of a certification cycle, that household member should sign Form 9887 and Form 9887-A **within 7 days of turning 18**. (See HUD 9887 Fact Sheet for exceptions due to extenuating circumstances) All HUD-9887's will be placed in a resident file and will be updated on an annual basis for each adult household member.

EIV Use and Security Policy

The HUD 9887 Fact Sheet will be provided to all adult household members required to sign the form. By signing this HUD Form 9887 and HUD Form 9887-A, the applicant/resident authorizes HUD and/or the owner/agent to obtain and verify income and unemployment compensation information from various sources including, but not limited to the IRS, the Department of Health and Human Services and the Social Security Administration, current and former employers and state agencies.

User Names, Passwords and Password Changes

Many systems require frequent changes in passwords. Secure Systems/ EIV passwords will be changed in accordance with HUD Secure Systems requirements. Users will not share user names or passwords with any other employee or with anyone outside the organization. EIV access granted to an employee or authorized user will be revoked when access is no longer required or prior to termination of that employee or user to ensure data safety. Termination of EIV Access and un-assigning property access through "Property Assignment Maintenance" is required.

The EIV file will be documented to indicate when user access was terminated by the EIV Coordinator. Documentation of termination will be maintained in the property EIV file and in the employee's personnel file.

Computer System Security Requirements

All computer systems and computers will have password restricted access. The owner/agent will also use Antivirus software to limit data destruction or unintended transmission via virus, worms, Trojan horses or other malicious means. Remote access by other computers other than those specifically authorized is prohibited.

Authorized users of EIV data are directed to avoid leaving EIV data displayed on their computer screens where unauthorized users may view it. A computer will not be left unattended while the user is "logged in" to Secure Systems. If an authorized user is viewing EIV data and an unauthorized user approaches the work area, the authorized user will lessen the chance of inadvertent disclosure of EIV data by minimizing or closing out the screen on which the EIV data is being displayed.

Physical Security Requirements

The owner/agent may use a combination of methods to provide physical security for resident file records. The EIV data may be maintained **in a locked metal file cabinet within a locked file room.**

Restricted Areas: **The owner/agent** will have the areas clearly identified by the use of prominently posted signs or other indicators. For example "Employees Only". This sign will be posted on the door to the locked file room. The restricted areas will be separated from non-restricted areas by physical barriers that control access and/or will have limited points of entry.

Since the EIV data in resident files is maintained in the locked file room, **designated staff** will establish and maintain a key control log to track the inventory of keys available, the number of keys issued and to whom the keys are issued. All employees and contractors who have been issued keys to the file room will complete a form acknowledging the receipt of the key. See Appendix A.

EIV Use and Security Policy

Users will retrieve computer printouts as soon as they are generated so that EIV data is not left unattended in printers or fax machines where unauthorized users may access them. EIV data will be handled in such a manner that it does not become misplaced or available to unauthorized personnel.

Use and Handling of EIV Data

EIV Data serves two purposes:

1. Verification of specific income information provided by the resident
2. Monitoring resident and staff compliance

Use of the data is described in the EIV User Policies. This policy is designed to describe the security protocol used to protect EIV data.

EIV Printouts

Reports available through EIV will not be printed to a shared printer unless the EIV user plans to immediately retrieve the data. It is preferred that all EIV printouts are sent to the user's personal printer. EIV printouts will be stored in the resident file in a separate manila envelope. The Documentation of EIV Data will be included in the resident file. This entire file will be made available to authorized people including appropriate staff or contractors (i.e. Service Bureaus, contractors performing file reviews, etc.) for the owner/agent, HUD staff, Contract Administration staff and the Office of the Inspector General.

If other people are tasked with reviewing the file, such as financial auditors complying with the Consolidated Audit Guide (Handbook IG 2000.04), the EIV printout in the manila folder including the EIV printout will be removed from the file and the Documentation of EIV Data will remain in the file to provide appropriate information required by the file audit.

Note regarding properties with Tax Credit or 515 "layering": Neither the EIV Printout nor the Documentation of EIV Data will be provided to any Tax Credit or 515 Auditor since EIV may not be used to verify information for residents participating in those programs. Alternative verification documents must be used to verify income for Tax Credits or 515 programs. For Social Security and Medicare information, the resident file must include an SSA Benefit/Award letter. For employment income and unemployment income, the resident file should contain verification documents as provided in HUD Handbook 4350.3 Revision 1, Appendix 3.

If a resident requests a copy of their own EIV printout, a copy will be produced. The staff person providing the copy will note that the printout is a copy provided to the resident upon request. This note will include the following:

- This is not an original, this is a copy provided to: _____
- On _____, 20__
- By _____ (name will be printed)
- Initials _____

EIV Use and Security Policy

The appropriate staff will make a note in the file any time a copy of the EIV data is obtained by authorized persons and taken off site. This includes copies provided to the applicant/resident, other internal staff, HUD, CA or OIG staff. Under no circumstances will the EIV information be provided to anyone other than those noted in this paragraph.

Other Language

Since site staff may not have access to the EIV database, designated staff is responsible for providing income verification and discrepancy information to the site. Information must be sent in such a way as to ensure the security of the data. Preferably, information will be sent electronically via email or via electronic fax. The email will be opened by the appropriate staff person, the information will be printed and the email will be immediately deleted from the recipient's email box.

If necessary, printouts will be produced by designated staff and sent express mail. In this case the recipient will be required to sign for the package to ensure that the information is delivered and there is no risk of disclosure to unauthorized persons.

Immediately upon receipt, the printouts will be filed and secured as appropriate.

Electronic Information from EIV

Under no circumstances should anyone save or scan EIV information to retain an electronic copy. In order to ensure compliance with HUD's security requirements, EIV information should only be produced in hard copy and maintained in accordance with the recordkeeping requirements outlined by HUD.

Alternative

In some cases, there may be a need to send or store EIV information electronically. If there is need to store the information on a hard drive, a specific folder will be created. The folder will be password protected to prevent unauthorized access. Information in the folder will be purged periodically to comply with HUD's EIV file retention policies.

If EIV information is copied to portable media (CD, DVD, tape, etc.) that portable media will be destroyed appropriately upon completion of the intended use.

Reporting Improper Disclosures

Recognition, reporting, and disciplinary action in response to security violations are crucial to successfully maintaining the security and privacy of the EIV system. These security violations may include the disclosure of private data as well as attempts to access unauthorized data and sharing of User ID's and passwords. Upon the discovery of a possible improper disclosure of EIV information or other security violation by an employee or any other person, the individual making the observation or receiving the information will contact the EIV Coordinator and **designated staff** who will document all improper disclosures in writing providing details including who was involved, what was disclosed, how the disclosure occurred, and where and when it occurred. The EIV Coordinator will immediately review the report of improper disclosure and, if appropriate, the EIV Coordinator will remove EIV access.

EIV Use and Security Policy

Improper disclosure of any information is grounds for immediate termination. All employees should carefully review the EIV Access Authorization Form to understand the penalties for improper disclosure of EIV data.

Disposal of EIV Information

EIV data will be destroyed in a timely manner based on the information provided in HUD's published EIV training materials, HUD notices or as prescribed by the owner/agent's policy and procedures. The owner/agent's policy and procedures will not allow data retention that is longer than the time allowed in the published HUD materials.

As necessary, **all EIV originals will be shredded.** Information about use of EIV information and how printouts were destroyed will be maintained in the resident file.

EIV Use and Security Policy

Appendix A

Mandatory EIV Reporting Schedule (RAD-PBRA Only)

EIV Reports will be pulled according to the schedule below by each property manager to cover the assigned areas of RAD-PBRA Project(s):

Report	Frequency
1. Existing Tenant Search	Before MI/After 9887&9887A has been signed
2. Failed Pre-screening/Failed Verification Report	Monthly
3. Deceased Tenant's report	Quarterly
4. New Hires Report	Quarterly
5. Multiple Subsidy Report	Quarterly
6. Income Report	90 days after MI
7. Income Report/Income Discrepancy Report	At Annual and Interim Certification
8. No Income Report	Quarterly

B.2 Occupancy by Over-Income Families

Subject to certain restrictions, HUD authorizes, through 24 CFR 960.261, HAMC to evict or terminate the tenancies of families because they are over income. Unless required to do so by local law, HAMC may not evict or terminate the tenancy of a family solely because the family is over income if: (1) the family has a valid contract of participation in the Family Self-Sufficiency (FSS) program, or (2) the family is currently receiving the earned income disallowance (EID). This rule does not require HAMC to evict over-income residents, but rather gives HAMC the discretion to do so thereby making units available for applicants who are income-eligible.

HAMC will not renew a public housing household lease if family has continually exceeded the Area Median Income for a period of five (5) consecutive years and are not participating in the Family Self Sufficiency Program or receiving the Earned Income Disallowance.

In the event of hardship, the family may request an extension if a known household change will be occurring, known decreases in future earnings or other qualifying events that may reduce the household income.

Implementation of the above restriction became effective March 2016. Existing households that may be over income or have been over income, will be given the five (5) year timeline at their next annual recertification following implementation.

Northwest Area	Southwest Area	Peoria Area	East Valley Area
Over-Income Families 4	Over-Income Families 0	Over-Income Families 3	Over-Income Families 1
FSS Over-Income Families 0	FSS Over-Income Families 0	FSS Over-Income Families 1	FSS Over-Income Families 0
EID Over-Income Families 0	EID Over-Income Families 0	EID Over-Income Families 0	EID Over-Income Families 0
Total Over-Income Families: 4	Total Over-Income Families: 0	Total Over-Income Families: 2	Total Over-Income Families: 1

B.2 Project Based Vouchers

HAMC submitted a Low-Income Housing Tax Credit application to the Arizona Department of Housing for the development of a Mesa, Arizona 60-unit new construction project known as “The Residences at Temple Groves” as co-developers with Gorman and Company. This site would make an ideal location for a LIHTC-financed development with HAMC Project Based Vouchers (PBV). HAMC would seek 80% of the units (48) be PBV.

HAMC may work with non-profit partners to administer Project Based Vouchers.

Appendix B. 3 Board Resolution & Compliance Certification

RESOLUTION 18-005

SUBMISSION OF THE FISCAL YEAR 2018-2019 PUBLIC HOUSING AGENCY PLAN TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT AS REQUIRED BY THE QUALITY HOUSING AND WORK RESPONSIBILITY ACT OF 1998

WHEREAS, the Quality Housing and Work Responsibility Act was passed by the U.S. Congress and signed into law by the President in October of 1998 requiring local housing authorities to annually prepare and submit to the U.S. Department of Housing and Urban Development (HUD) an Annual Plan; and

WHEREAS, the Housing Authority of Maricopa County (HAMC) Annual Plan is a comprehensive guide to HAMC's public housing agency (PHA) policies, programs, operations, and strategies for meeting local housing needs and goals in the upcoming fiscal year and CFP Five-Year Action Plan and;

WHEREAS, the Board of Commissioners of the Housing Authority of Maricopa County are required by the U.S. Department of Housing and Urban Development to certify, by resolution, that the Board approves the submission of the Housing Authority of Maricopa County Fiscal Year 2018-2019 PHA Annual Plan; and

WHEREAS, the Annual Plan must be submitted to the U.S. Department of Housing and Urban Development by April 13, 2018.

NOW THEREFORE:

BE IT RESOLVED, the Board of Commissioners of the Housing Authority of Maricopa County hereby adopts Resolution No. 18-005 and authorizes the submission of the Housing Authority of Maricopa County Fiscal Year 2018-2019 PHA Annual Plan to the U.S. Department of Housing and Urban Development.

BE IT ALSO RESOLVED, the Chairman of the Authority's Board of Commissioners is authorized to execute on behalf of the Housing Authority of Maricopa County all HUD required certifications relative to the Annual Plan including form HUD-50077 (Compliance with PHA Plans and Related Regulations).

Dated this _____ day of _____, 2018.

Housing Authority of Maricopa County

ATTEST:

Chairman, Board of Commissioners

Gloria Munoz, Clerk of the Board

Approved As To Form

Attorney for Housing Authority

**PHA Certifications of Compliance
with PHA Plans and Related
R e g u l a t i o n s**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 08/30/2011

**PHA Certifications of Compliance with the PHA Plans and Related Regulations:
Board Resolution to Accompany the PHA 5-Year and Annual PHA Plan**

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 2018-2019, 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 certifies that there has been no change, significant or otherwise, to the Capital Fund Program (and Capital Fund Program/Replacement Housing Factor) Annual Statement(s), since submission of its last approved Annual Plan. The Capital Fund Program Annual Statement/Annual Statement/Performance and Evaluation Report must be submitted annually even if there is no change.
4. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (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.
5. 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.
6. 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.
7. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address 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 maintain records reflecting these analyses and actions.
8. For PHA Plan 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 2006-24);
 - 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 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 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).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. 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.
11. 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.
12. 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.

13. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
14. 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.
15. 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.
16. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
17. 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.
18. 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).
19. 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.
20. 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.
21. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
22. The PHA certifies that it is in compliance with all applicable Federal statutory and regulatory requirements.

PHA Name

PHA Number/HA Code

5-Year PHA Plan for Fiscal Years 20 - 20

Annual PHA Plan for Fiscal Years 2018 - 2019

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
Signature	Date

Appendix B. 4 Fiscal Year Audit

B.4 Most Recent Fiscal Year Audit

The Housing Authority of Maricopa County respectfully submits the following Corrective Action Plan for the year ended 2017. The audit findings from the Schedule of Findings and Questions Costs for the year ended June 30, 2017 are discussed below. The finding is numbered consistently with the number assigned in the schedule provided by the independent accounting firm Maletta & Company, CPAs, 43 Enterprise Drive, Bristol, Connecticut 06010.

FINDINGS RELATED TO THE FINANCIAL STATEMENT AUDIT AS REQUIRED TO BE REPORTED IN ACCORDANCE WITH GENERALLY ACCEPTED GOVERNMENT AUDITING STANDARDS

MATERIAL WEAKNESS

2017-001 Balance Sheet Reconciliation

Condition: Balance sheet accounts are not reconciled timely and/or on a periodic basis. Most significantly, bank reconciliations were not completed timely throughout the year. In addition, the bank reconciliation process includes significant recording activities..

Criteria: Adequate internal controls require timely recording and reconciliation of general ledger activity to ensure accurate financial reporting and the safeguarding of funds.

Cause:

- Employee turnover
- Chronically behind on financial processes/reconciliations
- Complexity of accounting enterprise software including creation of new cost centers
- Increased training and monitoring requirements due to the above causes.

Effect or Potential Effect: Significant yearend reconciliations and adjustments were necessary to report accurate financial statements. Most significantly, bank reconciliations contained approximately \$90,000 in unreconciled differences and interfund balances and interprogram transfers required \$321,725 and \$493,920 in audit adjustments to correct.

Recommendation: We recommend that financial activity be reconciled on a periodic basis to ensure accurate and timely financial reporting. Further, we recommend the Authority discontinue the process of reported and recording inter-program and other month-end reconciliation entries through the bank reconciliation function. The bank reconciliation process should not be used to track and record entries within the accounting system. Unreconciled items should be corrected with approved journal entries in a timely basis.

Corrective Action/Actions Taken: HAMC will be updating the bank reconciliation process to include timely resolution for "unreconciled" or "need more research" items along with separate reconciliations for non-cash items. Additionally trainings and technical assistance has been obtained to accelerate and address the agency's learning curve for newer staff.

Target Completion Date: Corrective action has been taken with full implementation by December 2017, which includes review and reconciliation of all balance sheet accounts on a monthly basis.

SIGNIFICANT DEFICIENCY

2017-002 Reporting Housing Choice Voucher-CFDA # 14.871

Condition: Financial data reported to HUD through the Voucher Management System (VMS) was not reported in accordance with program requirements as data contained errors or was otherwise incomplete. Missing data included reporting monthly FSS escrow payments and FSS forfeitures. In addition, it is unclear if other activity such as ACH returns and landlord repayments are effectively considered in reported amounts

Criteria: Agencies are required to report leasing and other programmatic activity to VMS on a monthly basis in accordance the accrual method of accounting.

Cause: Employee oversight in reporting certain line items of VMS and lack of reconciliation and/or assessment of completeness of data reported.

Effect or Potential Effect: Authority reported program expenditures in excess of actual amounts resulting in inaccurate program funding totaling approximately \$100,000 due to error and potentially another \$73,663 due to differences in annualized amounts versus amounts reported in the financial statements..

Recommendation: We recommend the Authority update VMS to adjust for items identified during the audit to ensure that program funding is reconciled appropriately prior closeout of the calendar year funding period. In addition, reported amounts should be reconciled to bank activity and/or the Authority's general ledger for appropriateness, accuracy and completeness. Further, financial activity reported in VMS should include all areas required by program requirements such as reporting of FSS Escrow Deposits and FSS forfeitures in the appropriate reporting fields.

Corrective Action/Actions Taken: HAMC will be reconciling VMS data with bank activity as part of the bank reconciliation and month end process to include proper classification on financial statements, sub ledgers, and external reports along with timely resolution of unreconciled or outstanding balances.

Target Completion Date: Complete, corrective action has been taken with full implementation by December 2017, which includes audit adjustments to VMS reports and reconciliation and transfer of FSS balances.

Appendix B. 5 Progress Report

B.5 Progress Report

The Mission of the Housing Authority of Maricopa County is to improve the quality of life of families and strengthen communities by developing and sustaining affordable housing programs; and to become a leading housing authority by exemplifying best practices, offering innovative affordable housing programs, and expanding accessibility throughout Maricopa County. HAMC's progress in meeting its Mission and Goals:

Increase opportunities for our residents to move beyond their housing needs towards self-sufficiency.

HAMC has built partnerships with other local government and nonprofit agencies to increase services and resources available to HAMC residents and HCV voucher holders to move towards personal development, education, and employability. Of note, HAMC has maintained linkages to Maricopa County Human Services Department programming allowing HAMC residents and voucher holders to improve their credit scores, obtain GED certificates, attend college, earn workforce/technology certificates, increase wage based incomes, and reduce reliance on welfare assistance. Elderly and disabled families benefit from these partnerships through improved access to programming such as SAIL case management and personal care and home health assistance.

The relationship with Maricopa County Human Services has been expanded to include properties and participants in its RAD conversions. Coffelt and Madison Heights have access to resident services provided by many partners to include Maricopa County Human Services, A New Leaf, Valle de Sol, Avondale Elementary School District, Kid's Café with St Mary's Food Bank, City of Phoenix Parks and Recreational Department and Si Se Puede Robotics Program. The services include access to clinical services, recreational activities, STEM & after school programming with snacks, workforce connections, training/education, access to head start, referrals for assistance from Community Action Agencies and senior programming.

HAMC established a new partnership with Maricopa County Public Health in the rollout of a Community Health Worker Internship for HAMC residents. Secured one resident internship and implemented health service activities for El Mirage and Surprise. HAMC also established a partnership with A New Leaf FOC La Mesita Workforce whereby graduated 5 Mesa housing residents from the program.

HAMC's resident services goals include seeking future funding and creating a flagship program to continue supporting site based partner services coordination and resident self-sufficiency engagement activities. A 2018 Visioning Session will focus on securing pools for funding key resident self-sufficiency needs, service partner coordination activities and new service gaps identified through the ROSSSC effort. The resident service categories being explored for development under our HAMC Resident Services Flagship Program is anticipated to include: Resident Workforce / Work experience training, Financial Independence /Self Reliance , After School childcare/child watch, Nutrition /Food Security services, Community Health/Public Health Education , Mental Health /Parent and Senior Services.

Increase housing options in underserved communities.

The HAMC-Mercy Maricopa Integrated Care BRIDGE to Permanency Program grew from 50 to 100 subsidies within the first year. Though the program is not yet leased up to capacity, all of the slots are active and participants are in search mode. HAMC anticipates expansion of our partnership with MMIC in the Bridge program.

HAMC implemented a program whereby a portion of its Housing Choice Voucher attrition is dedicated to assist in the County's efforts to end homelessness. Additionally, a Justice-Involved Tenant Based Rental Assistance program in partnership with Maricopa County Correctional Health and the Human Services departments was developed and implemented.

HAMC's Housing Program experienced modest improvement in 2017 in housing the homeless population. Fourteen (14) families, with a "verifiable" Homeless preference were pulled from the CY 2017 Public Housing Wait List and housed within our communities.

Madison Heights has a designated 30 units for Homeless families. In CY 2017, a total of five (5) families with a "Homeless" Designation moved into Madison Heights. As of December 2017, 27 of the 30 units were occupied with families who received a Homeless preference.

All HAMC properties, through HUD's RAD program, will convert to Section 8 rental assistance and will undergo rehabilitation and/or redevelopment as outlined in Conversion of Public Housing to Project-Based Assistance under RAD section of this document. The redevelopment of two of HAMC's largest properties, Madison Heights and Coffelt, is complete. 335 more Public Housing Units have been converted into the RAD program capitalized over the next 20 years using private and public funds.

66 Units (Norton and Watson) were released from public housing restrictions and have been repositioned as "market affordable." They are currently operated as affordable market rentals, and being evaluated in various partnership capacities that may include more density in Norton and a potential disposition of units in Watson.

In late 2017, HUD published PIH 2017-17 "Registration of Interest for HUD-VASH Vouchers. The 2017 Appropriations Act provides \$40 million in VASH funding that will support approximately 5,500 new vouchers. The notice seeks to identify PHAs with interest in receiving new HUD-VASH awards. These vouchers will be administered in partnership with the VA and enable homeless veterans and their families to access affordable housing with an array of supportive services. The PHX VA provided a letter of support for HAMC to apply in this round for 20 project-based and 10 tenant-based vouchers in the Avondale, Surprise, Glendale, or Peoria area. HAMC was not successful in its application.

HAMC evaluated several options for pre-purchase counseling and down payment/closing cost assistance, and determined the Home in Five program is the best option for the 70-west valley single family homes. HAMC will order an appraisal of each home, prepare a pre-development budget and develop the homeownership plan.

Promote employee growth and build organizational capacity in support of the agency becoming a High Performer.

HAMC was again officially designated a High Performing agency. This is the third consecutive year HAMC has been High Performer and submitted a SEMAP certification with zero Corrective Actions identified.

The Board of Commissioners supported HAMC in the establishment of an affiliate non-profit for the purposes of aiding HAMC in its endeavor to increase housing options in Maricopa County. In August 2017, the Board approved Gem Housing Solutions Articles of Incorporation and Bylaws, and in November 2017 approved the appointments of Gloria Munoz, Mario Aniles, and Irma Hollamby to the Board of Directors. The nonprofit was incorporated in December 2017.

One strategy HAMC employed to promote organizational growth and build capacity is through the cultivation of partnerships with community agencies and other industry organizations as a resource for information and industry trends. To that end, the Executive Director is President of the Arizona Housing Directors Association and Arizona Housing Alliance, and a Board member of the Arizona Multihousing Association. The Director of Administration & Housing Services serves as Membership chair on the National Association of Housing and Redevelopment Officials, Arizona Chapter, and serves as a partner in Maricopa County's Hand In Hand Collaborative – a group of representatives from Maricopa County Correctional Health Services, (CHS), Justice Systems Planning & Information (JSPI), Human Services Department (HSD), Housing Authority of Maricopa County (HAMC), and Mercy Maricopa Integrated Care (MMIC), who have created a partnership to reduce recidivism, and connect people experiencing homelessness, and are justice engaged, to appropriate housing, and supportive services. All these organizations provide industry updates on the local, state and federal level, and this information is shared with staff.

The ROSSSC Program established new on-site service partnerships to coordinate health/ health education services through MC Public Health, MC Access Point Workforce Development services, New Leaf family resources partnership, Touchstone Behavioral Health Substance Abuse prevention and Teen Services, St Mary's Food Bank/USDA, Kids Café and Back Pack

Programs and expansion of CPLC Family Resource Center services. Housing communities free afterschool child watch service through ROSSSC sponsored now provides afterschool resident operated child watch services at Rose Terrace, El Mirage, and Madison Heights. Eighty families are enrolled in this effort with expansion to be considered for 2018.

HAMC is piloting HUD's new inspection protocol called UPCS-V. This new protocol will enhance the consistency and objectivity of the inspection process, and will provide more information about the condition of individual housing units. Through this initiative, HUD aims to clarify and streamline inspection processes for housing authorities and inspectors while increasing owners' and tenants' access to detailed information about their homes in a national database. The HCV Inspections Department is on track to work side by side with HUD on their pilot program for UPCS-V where they will receive hands on training from HUD staff.

Emphasize organizational performance and results by being responsive to our customers.

FY2017 Audit resulted in an "Unmodified" audit opinion (the best audit opinion that can be obtained). The agency continues to show it can respond to increased financial complexity as we continue to evolve by ensuring investment in our infrastructure and human capital is maintained and areas of improvement addressed. Feedback from our audits, consultants, partners, and other stakeholders continues to be a major factor in prioritizing our resources and an ongoing source of validation that external expectations are being met. Our Mixed Finance sites were also provided "Unmodified" opinions allowing us to remain compliant with our lenders and partners. We strive to maintain a high level of integrity, accuracy, and prudence in our financial stewardship, as evidenced by our financial performance, and remain leaders in our industry due to the mission focus and forward thinking of our Director and dedication and capacity of our staff.

Appendix B. 6 Resident Comments

B.6 Resident Advisory Board Comments

2018 Annual Agency Plan Resident Meetings

HAMC facilitated local area meetings to address the required US Department of Housing and Urban Development mandate that the PHA coordinate an annual process, providing opportunity for Public Housing Residents to review and give their input to the PHA (HAMC) concerning the agency plan.

HAMC facilitated the Annual Plan process which included:

- ◆ Formal meetings with staff and residents to discuss community accomplishments, current issues, and to solicit ideas and solutions for their local communities as part of the Annual Plan Input process.
- ◆ Discuss HAMC services and improvements completed within the past year.
- ◆ Discuss and solicit input on progress made toward the accomplishment of previous year recommendations and actions requested by the residents.
- ◆ An update on the RAD conversions since the last resident meetings held in September 2016.
- ◆ Solicit input on new perspectives and suggestions from resident participants on future actions and improvements desired for their community.

Meeting Notices and Community Meeting Schedules were distributed and posted at the local public housing properties. Although agenda content was common for all meetings, dialogue and feedback from residents was specific and distinct for each community and individualized local input was able to be gathered and assessed. Staff who attended the meeting provided responses and information to questions from residents. The local Property Manager served as the meeting facilitator and recorder.

Northwest Area	Southwest Area	Peoria Area	East Valley Area
January 2, 2018	January 29, 2018	January 11,16,18, 23, 25, 2018	December 19, 2017
8 Residents Participated	12 Residents Participated	9 Residents Participated	10 Residents Participated
General Topics:	General Topics:	General Topics:	General Topics:
RAD conversion updates	RAD Conversions Q & A	RAD Conversions Q & A	RAD Conversions Q & A:
Resident Requests: Rock landscaping, pavers and carports Trees trimmed properly New exterior paint Pictures of improvements to the property	Resident Requests: Ceiling fans Improved landscaping Exterior Paint	Resident Requests: Additional or improved Lighting	Resident Requests: Community Room Picnic/Grill Area Trash Bins secured with locks

RAB recommendations/requests are being considered or implemented in the site rehabilitation associated with the RAD-PBRA or RAD-PBV Conversions. Although some recommendations are more aligned with general property management and operations, these requests will be considered on an on-going basis as budgetary restraints allow.

Appendix B. 7 Certification of PHA Plan Consistency with Consolidated Plan

**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, BRUCE LIGGETT, the DIRECTOR, MARICOPA CTY HUMAN SERVICES
Official's Name *Official's Title*

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

HOUSING AUTHORITY OF MARICOPA COUNTY
PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of

Impediments (AI) to Fair Housing Choice of the

MARICOPA COUNTY
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.

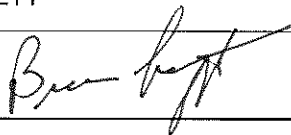
The Housing Authority of Maricopa County's PHA Plan and the Maricopa County Consolidated Plan both outline priorities to provide affordable housing opportunities to low income residents and opportunities to assist residents in achieving self sufficiency. Both the Housing Authority and Maricopa County seek to reduce impediments to fair housing choice by aligning its fair housing efforts with the regional AI.

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

BRUCE LIGGETT

Signature



Title

DIRECTOR, MARICOPA COUNTY
HUMAN SERVICES DEPARTMENT

Date

3/14/18

Appendix C.1 5-Year Capital Action Plan

Capital Fund Program—Five-Year Action Plan

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Part I: Summary						
PHA Name/Number Housing Authority of Maricopa County AZ20P00950116		Locality (City/County & State) Phoenix, Maricopa, Arizona			<input checked="" type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No: 1	
A.	Development Number and Name	Work Statement for Year 1 FFY __2016__	Work Statement for Year 2 FFY __2017__	Work Statement for Year 3 FFY __2018__	Work Statement for Year 4 FFY __2019__	Work Statement for Year 5 FFY __2020__
B.	Physical Improvements Subtotal	Annual Statement	253,926	205,404	279,090	62,646
C.	Management Improvements		2,000	2,000	2,000	
D.	PHA-Wide Non-dwelling Structures and Equipment		2,000	2,000	2,000	
E.	Administration		56,846	52,566	52,566	15,294
F.	Other					
G.	Operations		53,692	113,692	60,006	25,000
H.	Demolition					
I.	Development		200,000	150,000	130,000	50,000
J.	Capital Fund Financing – Debt Service					
K.	Total CFP Funds		568,464	525,662	525,662	152,940
L.	Total Non-CFP Funds					
M.	Grand Total		568,464	525,662	525,662	152,940

Capital Fund Program—Five-Year Action Plan

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Part I: Summary (Continuation)						
PHA Name/Number Housing Authority of Maricopa County- AZ20P00950116		Locality (City/county & State) Phoenix/Maricopa/Arizona			<input checked="" type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No: 1	
A.	Development Number and Name	Work Statement for Year 1 FFY __2016__	Work Statement for Year 2 FFY __2017__	Work Statement for Year 3 FFY __2018__	Work Statement for Year 4 FFY __2019__	Work Statement for Year 5 FFY __2020__
		Annual Statement				
	PHA Wide Activities		62,826	60,904	97,590	6,646
	AMP 2 Clare Feldstadt/Father Fidelis		22,500	38,000	50,000	10,000
	AMP 5 Baden/Hollar		35,000	28,000	33,500	7,500
	Amp. 7 Scattered site homes-West Valley		35,500			
	Amp. 8 Casa Bonitas/Paradise/Villa Monte Rosa/Flora Statler		24,000	15,000	15,000	15,000
	Amp. 9 John Hammond/Varney		38,600	45,000	65,000	23,500
	AMP 15 Parkview		35,500	18,500	18,000	
	Subtotal		253,926	205,404	279,090	62,646

Part III: Supporting Pages – Management Needs Work Statement(s)				
Work Statement for Year 1 FFY __2016__	Work Statement for Year <u>2</u> FFY <u>2017</u>		Work Statement for Year: <u>3</u> FFY <u>2018</u>	
	Development Number/Name General Description of Major Work Categories	Estimated Cost	Development Number/Name General Description of Major Work Categories	Estimated Cost
See	PHA WIDE		PHA WIDE	
Annual Statement	Training, consulting	2,000	Training, consulting	2,000
	Administrative	56,846	Administrative	52,566
	Office equip, maint. Equip	2,000	Office equip, maint. Equip	2,000
	Operations	53,692	Operations	113,692
	Development	200,000	Development	150,000
	Subtotal of Estimated Cost	\$ 314,538	Subtotal of Estimated Cost	\$ 320,258

Part III: Supporting Pages – Management Needs Work Statement(s)				
Work Statement for Year 1 FFY ___2016___	Work Statement for Year _____4_____ FFY _____2019_____		Work Statement for Year: _____5_____ FFY _____2020_____	
	Development Number/Name General Description of Major Work Categories	Estimated Cost	Development Number/Name General Description of Major Work Categories	Estimated Cost
See Annual Statement	PHA Wide		PHA Wide	
	Training, consulting	2,000		
	Administrative 10%	52,566	Administrative 10%	15,294
	Office equip, maint. Equip	2,000		
	Operations	60,006	Operations	25,000
	Development	130,000	Development	50,000
	Subtotal of Estimated Cost	\$ 246,572	Subtotal of Estimated Cost	\$ 90,294