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Housing Authority of the City of Arlington

Five Year Plan for 2016 – 2020

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Annual Plan

Fiscal Year Beginning 10/1/16

Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

Goal: Expand the supply of assisted housing

Objectives:

- Apply for additional rental vouchers
- Leverage private or other public funds to create additional housing opportunities

Goal: Improve the quality of assisted housing

Objectives:

- Improve voucher management: (SEMAP score)
- Increase customer satisfaction

Goal: Increase assisted housing choices

Objectives:

- Provide voucher mobility counseling
- Conduct outreach efforts to potential voucher landlords

5.2

Goal: Provide an improved living environment

Objectives:

- Other – foster livable neighborhoods and celebrate diversity. Use the Housing Choice Voucher Program to expand housing opportunities beyond areas of traditional low-income and minority concentration; distribute maps at each briefing session for Housing Choice Voucher applicants which delineate areas of the City of Arlington with lesser concentrations of poverty.

Goal: Promote self-sufficiency and asset development of assisted households

Objectives:

- Increase the number and percentage of employed persons in assisted families
- Provide or attract supportive services to improve assisted recipients' employability
- Provide or attract supportive services to increase independence for the elderly or families with disabilities

Goal: Ensure equal opportunity and affirmatively further fair housing

Objectives:

- Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability
- Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability
- Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required

PHA Plan Update

(a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission:

- **Reasonable Accommodation Policy: Live-In Aide** – Effective date 3/1/15; **1)** The definition of a live-in aide applies to a specific person (i.e.; the applicant or program participant must identify a specific person to serve as their live-in aide); in most cases, may not be a member of assisted family or has been assisting family within the past 12 months; is not entitled to the HCV as the remaining member of the tenant family. **2)** The AHA is responsible to authorize the addition of a family member. The AHA is also responsible to authorize the HCV participant-identified live in aide. Relatives **currently** serving as a live in aide or relatives **proposed** to serve as a live in aide will be considered and evaluated on a case by case basis. The AHA recognizes that with this policy change (in March 2015) numerous families have received prior year approval for a relative to serve as their live in aide. While the AHA intends not to present a hardship to the household, the AHA recognizes its fiduciary responsibilities and will take reasonable care in making a fair and reasonable determination regarding live in aides. At annual recertification and new admission, the AHA shall evaluate, to the best of its ability, cases involving HCV participants where a relative is serving as a live in aide or where a relative is identified to serve as their live in aide. The AHA shall determine if the person identified to serve as a live in aide is a “family member” or “live in aide”. The determination made by staff shall be reviewed by the Program Manager (PM). The PM and the Compliance Officer shall evaluate each case on its own merits. If the two parties concur in their determination the Housing Specialist shall carry out their determination. Cases where the senior staff does not agree shall be presented to the Executive Director for final determination. **3) Considerations for a live-in aide:** Is the live-in aide a relative? The relationships (mother, sibling, etc). The relationship through blood or marriage. Was the proposed live-in aide a previous member of the household (provide detailed history of the HCV participant/applicant and the identified live-in aide)? Does the HCV participant have options for a person other than a relative to serve as their live-in aide? **4)** PHA must approve a live-in aide if needed as a reasonable accommodation in accordance with 24 CFR Part 8 to make the program accessible to and usable by a family member with a disability; **5)** In accordance with PIH Notice 2010-51, PHAs may not approve an unidentified live-in aide, nor a larger unit than the family qualifies for under the PHAs subsidy standards for an unidentified live-in aide; **6)** Occasional, intermittent, multiple or rotating care givers typically do not reside in the unit and would not qualify as live-in aides. Therefore, the PHA may not approve a live-in aide under these circumstances; **7)** A family may always request a reasonable accommodation to permit program participation by individuals with disabilities. A family’s composition or circumstances may warrant the provision of an additional bedroom to permit disability-related overnight care and allow the family equal use and enjoyment of the unit. Such limited exceptions to the established subsidy standards are permitted under 24 CFR Section 982.402(b)(8). The PHA must consider requests for an exception to the established subsidy standards on a case-by-case basis and provide an exception, where necessary, as a reasonable accommodation. The PHA shall document the justification for all granted exceptions; **8)** A PHA may only approve one additional bedroom for a live-in aide. Although a live-in aide may have PHA-approved family member/s live with him/her in the assisted unit, no additional bedrooms will be provided for the family members of the live-in aide. The PHA must ensure that housing quality standards (HQS) will not be violated and that there will be no more than two people per bedroom or living/sleeping space in the unit in accordance with 24 CFR § 982.401(d)(2)(ii). If the approval of additional family members of a live- in aide would result in the violation of HQS, the additional family members of the live- in aide may not be approved.
- **Reasonable Accommodation Policy: Medical Equipment** – Effective 10/1/14; Although the AHA may approve an additional bedroom for medical equipment if the need is documented by a health care provider, the actual equipment in the extra bedroom should be verified by the AHA during the annual inspection of the unit. It is recommended that the AHA Housing Inspector, or other, take photographs to document the presence of the medical equipment claimed to present the need for an additional bedroom. The AHA shall use reasonable judgment to determine if the request for a reasonable accommodation of an extra bedroom for the storage and use of medical equipment is appropriate. If the AHA approves the request and authorizes the participant to receive an additional voucher bedroom size, it is the responsibility of the AHA to determine if the extra bedroom is being used for its intended purpose. If the extra bedroom is not being used for the intended purpose, the AHA must reduce the subsidy standard and corresponding payment standard at the family’s next annual recertification. However, the AHA may take further action, if it believes any family obligations under 24 CFR Section 982.551 were violated.
- **Reasonable Accommodation Policy: Renting from Relative** – Effective date 10/1/14; HUD regulations prohibits HCV participants from renting to relatives. In the case of a participant with disabilities, the AHA will consider a request for a reasonable accommodation.
- **Reasonable Accommodation Policy: Annual HQS Inspections** – Effective date 9/1/14; Revision that re-inspection of units must take place within 24 months of the previous HQS inspection. Changed from 12 months.
- **Opening / Closing of Application Taking** – On May 5, 2014, the AHA opened its waiting list and concluded accepting new applications on May 16, 2014.
- **Establishing Preferences and Maintaining the Waiting List: Waiting List** – Effective date 5/5/14; Waiting list contains date and time of application or random assignment of short term open enrollment and applicants are selected by one of these methods. During the open enrollment period from May 5, 2014, through May 16, 2014, the AHA utilized HAPPY Software's Waiting List Check open enrollment software. To ensure that applicants with Special Needs, physical disabilities, or technology challenges had a fair opportunity to secure a position on the waiting list as able body persons or IT savvy persons, the AHA abandoned its traditional first-come, first-served basis of assigning position to applicants on the waiting list and instead established a new procedure for the May 5, 2014, open enrollment called Random Assignment. To ensure open and fair accessibility, after the closing of the open enrollment period, HAPPY Software will randomly assign to each applicant that applied between May 5 and May 15, 2014, their position on the waiting list.
- **Establishing Preferences and Maintaining the Waiting List: Preferences** – Effective date 3/1/15; The AHA discontinued the local preference for Hurricane Katrina impacted families.
- **Establishing Preferences and Maintaining the Waiting List: Special Vouchers** – Effective date 11/19/14; at the request of Mental Health Mental Retardation of Tarrant County (MHMR-TC), the AHA Board of Commissioners adopted a policy that "set aside" 10 Housing Choice Vouchers as special purpose vouchers for participants in the MHMR-TC's "Healthy Homes" grant to provide housing vouchers for housing homeless veterans and their families.
- **Subsidy Standards: Unit Size Selected; Utility Allowance** – Effective date 7/1/14; The utility allowance used to calculate the gross rent is based on the **lower** of the actual size of the unit the family selects or the voucher bedroom size. This is reflective of a change in the HCV program regulations published by HUD effective July 1, 2014. The rule change stems from the 2014 Appropriations Act. Under the previous rule, the PHA used the utility allowance for the actual unit size, regardless of the size authorized on the family's Voucher. As part of an orderly transition, PHA staff are not expected or required to re-work HCV files already processed for payment under the old rules. However, staff will implement the new rule at the HCV participant's next regularly scheduled annual recertification.

6.0

<p>6.0, Pt 2</p>	<ul style="list-style-type: none"> • Housing Quality Standards and Inspections – Effective date 8/1/14; The AHA transitioned to biennial HQS inspections for the HCV program as allowed by the 2014 Appropriations Act. For any unit under a HAP contract where an HCV HQS inspection has been completed within the 12 months preceding July 1, 2014, the 2014 Act allows the PHA to shift immediately to a biennial re-inspection schedule. For any unit where the most recent HCV HQS inspection took place prior to July 1, 2013, the PHA is required to complete an annual HQS inspection. Once the unit has been inspected, the PHA will then have the option to re-inspect in two years, thereby transitioning to biennial inspections henceforth. PHAs may, at their discretion, continue to inspect more frequently. All other rental housing assistance programs administered by the AHA will remain as annual inspections. • Recertifications; Reporting Interim Changes – Effective date 1/12/15: Deleted statement that "family will not be charged retroactively" if the AHA makes a calculation error at admission to the program or at an annual re-examination. • Records Retention Policy – Effective date 7/9/14: PIC reports and Program Participant Files can be destroyed after Calendar Year + 3 years; decreased from Calendar Year + 5 years. <p>(b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions. The AHA 5-Year and Annual Plan are posted at the main administrative office of the PHA, public libraries, and PHA website.</p>
<p>7.0</p>	<p>Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. <i>Include statements related to these programs as applicable.</i> NOT APPLICABLE</p>
<p>8.0</p>	<p>Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable. NOT APPLICABLE</p>
<p>8.1</p>	<p>Capital Fund Program Annual Statement/Performance and Evaluation Report. As part of the PHA 5-Year and Annual Plan, annually complete and submit the <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i>, form HUD-50075.1, for each current and open CFP grant and CFFP financing. NOT APPLICABLE</p>
<p>8.2</p>	<p>Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the <i>Capital Fund Program Five-Year Action Plan</i>, form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan. NOT APPLICABLE</p>
<p>8.3</p>	<p>Capital Fund Financing Program (CFFP). <input type="checkbox"/> Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements. NOT APPLICABLE</p>
<p>9.0</p>	<p>Housing Needs. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. See Attached Housing Needs Section</p>

Strategy for Addressing Housing Needs. Provide a brief 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. **Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan.**

The AHA will continue to seek to expand affordable housing opportunities for eligible families and to expand community partnerships that promote economic self-sufficiency. The AHA's strategy for addressing the housing needs of the poorest in our community involves flexible partnering with nonprofits, property owners, lenders, advocacy groups, social service providers, faith based groups, and other federal agencies.

The AHA will continue to use all available funding to serve eligible households, AHA services, and community partners to foster stable and livable neighborhoods. The AHA will continue to seek opportunities for available funding to leverage to expand housing stock for low income families in our community.

Specific strategies to maximize the number of affordable units available to the PHA include:

- Maintain or increase Housing Choice Voucher lease up rates by establishing payment standards that will enable families to rent suitable housing located throughout the jurisdiction;
- Acquire, rehabilitate and resell HUD foreclosed homes to income eligible households;
- Undertake measures to ensure access to affordable housing among families assisted by the PHA regardless of unit size required;
- Maintain or increase Housing Choice Voucher program lease up by marketing the program to property owners, particularly those outside of areas of minority and poverty concentration;
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies.

Specific strategies to increase the number of affordable housing units include:

- Apply for additional Housing Choice Voucher units as they become available;
- Leverage affordable housing resources in the community;
- Pursue housing resources other than public housing or Housing Choice Voucher tenant-based assistance;
- Apply for additional vouchers for persons with special needs, apply for funding to support homeless/transitional housing opportunities, and apply for funding to provide housing for persons with other special needs.

Specific strategies to support families at or below 30% of area median income include:

- To ensure the HUD regulatory requirement of not less than 75% of all new admissions to the HCV program from the waiting list be extremely low-income families, the AHA Board of Commissioners approved a resolution revising the Administrative Plan to allow the Executive Director to temporarily suspend the working preference if the AHA falls 5% below the mandatory requirement.

Specific strategies to assist the elderly include:

- The AHA has a working preference for admission to the Housing Choice Voucher program that includes the elderly and disabled heads of households and their spouses.

Specific strategies to assist families with disabilities include:

- Apply for special purpose vouchers targeted to families with disabled household members, as available;
- Affirmatively market to local non-profit agencies that assist families with disabilities;
- Maintain a preference for working families which includes disabled heads of household and their spouses;
- Provide referrals to the Housing Rehabilitation Program's Architectural Barrier Removal services;

Specific strategies to assist races or ethnicities with disproportionate housing needs include:

- Affirmatively market to persons whose race and/or ethnicity is shown to have disproportionate housing needs.

Specific strategies to affirmatively further fair housing include:

- Counsel Housing Choice Voucher participants about the location and availability of units outside of areas of poverty or minority concentration and assist them to locate those units;
- Market the Housing Choice Voucher program to owners outside of the areas of concentrations of poverty and minority concentrations.

The reasons for selecting the strategies above include the following:

- Funding constraints
- Limited availability of sites for HCV assisted housing
- Extent to which particular housing needs are met by other organizations in the community
- Evidence of housing needs as demonstrated in the Consolidated Plan or other information available to the PHA
- Influence of the housing market on PHA programs
- Community priorities regarding housing assistance
- Results from consultation with local or state government
- Results from consultation with residents and the Resident Advisory Board
- Results from consultation with social service organizations and advocacy groups

9.1

Additional Information. Describe the following, as well as any additional information HUD has requested.

(a) Progress in Meeting Mission & Goals. Provide a brief statement of the PHA's progress in meeting the mission & goals described in the 5-Year Plan.

Goal: Expand the supply of assisted housing

Objectives:

- **Apply for additional rental vouchers:** In the past five years, the Arlington Housing Authority (AHA) has successfully increased its baseline from 3,718 to 3,754 vouchers. AHA received 108 vouchers from HUD to assist residents of the Dallas TX Southcrest Apts in July 2013.
- **Leverage private or other public funds to create additional housing opportunities:** The AHA has applied for and received annual funding for the following programs.

Program	Year
Shelter Plus Care	2010-2015
HOME Tenant Based Rental Assistance (TBRA)	2010-2015
Supportive Housing Program	2010-2015
Homeless Housing and Supportive Program	2010-2015
Homelessness Prevention and Rapid Re-Housing Program	2012
Emergency Solutions Grant	2012-2014

- The AHA applied for and received \$50,000 funding from the Arlington Tomorrow Foundation to ensure the provision of individualized case management and support services to participants in the Supportive Housing Program (SHP) in 2013 and 2014.

Goal: Improve the quality of assisted housing

Objectives:

- **Improve voucher management:** (SEMAP score) The AHA has maintained a High Performer status annually since 2002.
- **Increase accessibility and customer satisfaction:** The AHA continues to make operational improvements to increase accessibility to critical services and customer satisfaction.
 - In 2011, the AHA implemented 100% direct deposits for landlord participants, eliminating paper checks and paper check processing. This action benefitted landlords by ensuring landlords received access to their payments faster. With direct deposit (ACH) landlords have immediate availability to the funds paid, with improved security. The AHA received an Award of Excellence for Administrative Innovation from the National Association of Housing and Redevelopment Officials (NAHRO) recognizing this achievement.
 - In 2013, the AHA installed digital signage monitors in its lobby area to enable waiting customers to benefit from audio / visual information about the many programs and services administered by the AHA. The AHA received an Award of Merit for Administrative Innovation from the National Association of Housing and Redevelopment Officials (NAHRO) recognizing this achievement.
 - In 2014, the AHA installed new Assistance Check technology that provides benefits to applicants, tenants, landlords and staff. Applicants can apply on-line for HCV assistance, update their applications, and receive communications from the AHA via email. Tenants can notify the AHA about changes in their income and complete interim redeterminations and annual re-certifications on-line. Tenants can also submit verifications and supporting documentation, request a change to their annual inspection appointment, submit questions to their Housing Specialist, and receive email and other information from the AHA. Landlords can receive and sign Housing Assistance Payments contracts and return them to the AHA through AssistanceCheck, request a change in inspection appointment, request a rent increase, query their payment records history, and communicate with the AHA

10.0

Goal: Increase assisted housing choices

Objectives:

- **Provide voucher mobility counseling:** During Certification and Annual Re-exam meetings, staff advises clients of their options to transfer their voucher to another city or state. Participants are also provided with a list of local housing authorities to assist them with their decision should they opt to move.
- **Conduct outreach efforts to potential voucher landlords:** In 2014, the AHA created a marketing brochure for property owners, providing the benefits of being a participant in the HCV program. Staff also placed phone calls to potential landlords to personally invite their participation in the HCV program.
- **Implement voucher homeownership program:** The AHA continues to promote the voucher homeownership program.
 - An additional twenty-six (26) participants became homeowners during the reporting period.
 - The AHA has assisted 33 new homebuyers to leverage their funds by utilizing available HOME Investment Partnership Program funding and Neighborhood Stabilization Program funding during the reporting period, receiving down payment, closing cost assistance and housing rehabilitation assistance.
- **Other** – The AHA successfully increased funding from two to three FSS staff positions who work with AHA's homeownership program.

Goal: Provide an improved living environment

Objectives:

- **Other** –The AHA continues to provide maps to applicants at briefing sessions to enable them to make informed housing choices. The maps identify the areas within the City of Arlington which have lower concentrations of poverty.

Goal: Promote self-sufficiency and asset development of assisted households

Objectives:

- **Increase the number and percentage of employed persons in assisted families:** Within the Family Self Sufficiency program, the number of employed FSS participants increased from 63% to 85%.
- **Provide or attract supportive services to improve assistance recipients' employability:** Through the FSS program, participants are offered instruction and courses in Nutrition, Budgeting, Credit Repair, and Preparation for Homeownership, Resume Writing, Job Readiness, Interviewing Skills, Parenting, and Education Preparation Assistance for College. In addition, referrals are made to the following partners for additional services: Tarrant County Housing Partnership, Inc., Educational Opportunity Center, Catholic Charities, Community Action Partners, Ways to Work, Angel Food Ministries, MHMR, Early Childhood Intervention, Christian Women's Job Core, YWCA, Family Pathfinders, and Texas A&M Agrilife Extension.
- **Provide or attract supportive services to increase independence for the elderly or families with disabilities.** The AHA provides referrals for services to the following: Easter Seals, Angel Food Ministries, Area Agency on Aging, American Association of Retired Persons, Catholic Charities, Mission Arlington, John Peter Smith Hospital, MHMR of Tarrant County and Family Endeavors (VA specific). Services provided are for health care, financial resources, employment, food, and general assistance.

<p>10.0 Pt 2</p>	<p>Goal: Ensure equal opportunity and affirmatively further fair housing Objectives:</p> <ul style="list-style-type: none"> • Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability: The AHA has implemented digital sign-in equipment in the lobby which captures information about primary languages spoken by visiting guests, applicants and participants. The AHA contracts with and uses professional language translation services which also includes sign language interpretation services. • Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability: To ensure participants have up-to-date property listings, the AHA encourages landlords to advertise their properties on GoSesction8.com and directs participants to the website. The AHA provides this information to all households, regardless of race, color, religion, national origin, sex, familial status, and disability. To increase the number of participating properties, the AHA created a marketing brochure for property owners, providing the benefits of being a participant in the HCV program. AHA staff also placed phone calls and made site visits to landlords to personally invite new landlord participation in the HCV program • Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required: The AHA maintains a list of available accessible housing to provide to participants with household members who have a disability and who are searching for suitable rental housing. The AHA also has established a Reasonable Accommodations policy which is adhered to by all program staff. The AHA also refers renters and owners to the Housing Rehabilitation Program to make dwelling units more accessible for household members with disabilities. Assistance with accessibility improvements is provided in the form of a grant to renters or owners who qualify to participate in the Housing Rehabilitation program. • Other - The AHA continues to refer all cases of reported housing discrimination to the local HUD Fair Housing office for remediation. • Other - The AHA maintains the practice of distributing the HUD publication - Fair Housing: It's Your Right booklet to voucher program participants searching for suitable housing. <p>(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification". A significant amendment or substantial deviation/modification is defined as one which would prevent the AHA from achieving one of its stated goal or adding a goal or program outside of the established goals and objectives.</p>
<p>11.0</p>	<p>Required Submission for HUD Field Office Review. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. Note: Faxed copies of these documents will not be accepted by the Field Office.</p> <ul style="list-style-type: none"> (a) Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> (which includes all certifications relating to Civil Rights) (b) Form HUD-50070, <i>Certification for a Drug-Free Workplace</i> (PHAs receiving CFP grants only) (c) Form HUD-50071, <i>Certification of Payments to Influence Federal Transactions</i> (PHAs receiving CFP grants only) (d) Form SF-LLL, <i>Disclosure of Lobbying Activities</i> (PHAs receiving CFP grants only) (e) Form SF-LLL-A, <i>Disclosure of Lobbying Activities Continuation Sheet</i> (PHAs receiving CFP grants only) (f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations. (g) Challenged Elements (h) Form HUD-50075.1, <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> (PHAs receiving CFP grants only) (i) Form HUD-50075.2, <i>Capital Fund Program Five-Year Action Plan</i> (PHAs receiving CFP grants only)

PLAN ELEMENTS

1. **ELIGIBILITY, SELECTION, AND ADMISSION POLICIES, INCLUDING DECONCENTRATION AND WAIT LIST PROCEDURES.**
 - a. Eligibility requirements are found in Chapter 2 “Eligibility for Admission” of the Administrative Plan of the Housing Authority of the City of Arlington (AHA). The AHA’s Administrative Plan is posted on the AHA’s web site and available at the AHA’s office for review.
 - b. Selection criteria are described in Chapter 3 “Applying for Admission” and Chapter 4 “Establishing Preferences and Maintaining the Waiting List” in the AHA’s Administrative Plan.
 - c. Deconcentration is addressed in Chapter 1 “Statement of Objectives and Policies” in the AHA’s Administrative Plan.
 - d. Waiting list procedures are also addressed in Chapter 4 “Establishing Preferences and Maintaining the Waiting List” in the AHA’s Administrative Plan.
2. **FINANCIAL RESOURCES** – AHA’s financial resources include HUD contribution and income from interest on reserves. The AHA’s operating budget is available for review upon request.
3. **RENT DETERMINATION** - Policies governing rents charged for housing choice voucher dwelling units is contained in the Administrative Plan. The Administrative Plan is posted on the AHA’s web site and is also available for review at the AHA office for review.
4. **OPERATION AND MANAGEMENT** - Not applicable.
5. **GRIEVANCE PROCEDURES** – Informal hearing and informal review procedures are contained in the Administrative Plan. The Administrative Plan is posted on the AHA’s web site and available at the AHA office for review.
6. **DESIGNATED HOUSING FOR ELDERLY AND DISABLED FAMILIES** – Not applicable.
7. **COMMUNITY SERVICES AND SELF-SUFFICIENCY** - The AHA operates a Family-Self-Sufficiency (FSS) Program. Program description and policies related to the FSS program are outlined in the Administrative Plan, Appendix 8 “FSS Action Plan, Operations and Escrow”. The Administrative Plan is posted on the AHA’s web site and available at the AHA office for review.
8. **SAFETY AND CRIME PREVENTION** – Not applicable.
9. **PETS** – Not applicable.
10. **CIVIL RIGHTS CERTIFICATION** - The AHA certifies that it examines its programs to identify any impediments to fair housing choice; addresses any impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction’s initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with the applicable Consolidated Plan for its jurisdiction.
11. **FISCAL YEAR AUDIT** – The AHA annual audit performed by an independent public auditor is available for review upon request.
12. **ASSET MANAGEMENT** – Not applicable.
13. **VIOLENCE AGAINST WOMEN ACT (VAWA)** - Specific information related to VAWA is contained in the Administrative Plan. The Administrative Plan is posted on the AHA web site and available at the AHA office for review.