

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

**Definitions.**

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

A. PHA Information.						
A.1	<b>PHA Name:</b> The Housing Authority of the County of DeKalb <b>PHA Code:</b> IL089 <b>PHA Type:</b> <input type="checkbox"/> Small <input checked="" type="checkbox"/> High Performer <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): 04/2020 <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) <b>Number of Public Housing (PH) Units:</b> 280 <b>Number of Housing Choice Vouchers (HCVs):</b> 611 <b>Total Combined:</b> 891 <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission					
<p><b>Availability of Information.</b> In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p>						
<input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)						
<b>Participating PHAs</b>		<b>PHA Code</b>	<b>Program(s) in the Consortia</b>	<b>Program(s) not in the Consortia</b>	<b>No. of Units in Each Program</b>	
					<b>PH</b>	<b>HCV</b>
Lead PHA:						

<b>B.</b>	<b>Annual Plan Elements</b>
<b>B.1</b>	<p><b>Revision of PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last <b>Annual PHA Plan</b> submission?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input type="checkbox"/> <input checked="" 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 type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership 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 type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) The PHA must submit its Deconcentration Policy for Field Office Review.</p> <p>➤ <i>See Attachment A, Chapter 4 of the ACOP</i></p> <p>(c) If the PHA answered yes for any element, describe the revisions for each element below:</p> <p>➤ <i>No revisions to policies have been made. However, HACD is in progress of drafting policies changes to adhere to HUD mandates. Revisions for the Administrative Plan and Admissions Policy are in progress.</i></p> <p>➤ <i>Per PIH2017-24 PHA's are required to include third-party agreements that generate non-rental income in their PHA Plan as a discussion of financial resources and planned uses of those resources. HACD will be renewing cellular tower leases, as necessary, that only reside on the IL0890001 Development. All rental income stays with the AMP and is used for operational support.</i></p>
<b>B.2</b>	<p><b>New Activities.</b></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 checked="" type="checkbox"/> <input 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"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> <p>➤ <i>2017 HUD approved 20 Project-Based Vouchers to coincide with our deconcentration efforts which are consistent with our 2014 strategic plan which includes meeting the needs of our community as demonstrated by supporting a supportive living facility program, and deconcentration of the North-West Corridor in the City of DeKalb. As of 2018, HACD has only Project Based six (6) vouchers with 14 of the 20 remaining. HACD will be evaluating new projects. This would include evaluating an additional supportive living facility and possibly work force housing.</i></p> <p>➤ <i>Units with Approved Vacancies for Modernization are for Asbestos Abatement during unit Turnaround/Rehab.</i></p> <p>➤ <i>HACD will be investigating developing units on vacant Public Housing/PHA owned land.</i></p>
<b>B.3</b>	<p><b>Progress Report.</b></p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p> <p>➤ <i>The Authority has continued to manage its programs at a high level and High Performer Status. HACD continues to expand its pool of qualified HCV Landlords. The Authority continues to evaluate available data that addresses housing needs and continues to participate in the DeKalb Area Rental Association as leaders in providing quality housing and rental management. HACD continues to work closely with social service agencies along with educational institutions to help increase self-sufficiency and promote asset development to the assisted households served. The Authority continues to seek additional non-federal funding such as local contributors, diversification in revenue streams and monies from the U of I Energy Efficiency grant. The Authority partners with many local agencies and the community college to provide resources for tenants. The Authority has also partnered with the DeKalb County Community Action Department to conduct a "Social Living Group" for Public Housing Residents and provide service counseling for HCV Briefing participants. The Authority has also partnered with AID in providing many counseling and case management resources for improved quality of living. HACD has been awarded more than \$20K in non-federal funds to assist with tenant security deposits.</i></p>

<b>B.4.</b>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<b>Other Document and/or Certification Requirements.</b>	
<b>C.1</b>	<p><b>Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan</b></p> <p><u>Form 50077-ST-HCV-HP</u>, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.  ➤ <i>See Attachment B.8</i></p>
<b>C.2</b>	<p><b>Civil Rights Certification.</b></p> <p><u>Form 50077-ST-HCV-HP</u>, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<b>C.3</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></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>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.  ➤ <i>See Attachment B.6</i></p>
<b>C.4</b>	<p><b>Certification by State or Local Officials.</b></p> <p><u>Form HUD 50077-SL</u>, <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.  ➤ <i>See Attachment B.7</i></p>
<b>D Statement of Capital Improvements.</b> Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).	
<b>D.1</b>	<p><b>Capital Improvements.</b> 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.  ➤ <i>See HUD Form 50075.2 approved by HUD on 09/24/2019.</i></p>

## Chapter 4

### APPLICATIONS, WAITING LIST AND TENANT SELECTION

#### INTRODUCTION

When a family wishes to reside in public housing, the family must submit an application that provides the PHA with the information needed to determine the family's eligibility. HUD requires the PHA to place all eligible families that apply for public housing on a waiting list. When a unit becomes available, the PHA must select families from the waiting list in accordance with HUD requirements and PHA policies as stated in its Admissions and Continued Occupancy Policy (ACOP) and its annual plan.

The PHA is required to adopt a clear approach to accepting applications, placing families on the waiting list, and selecting families from the waiting list, and must follow this approach consistently. The actual order in which families are selected from the waiting list can be affected if a family has certain characteristics designated by HUD or the PHA to receive preferential treatment.

HUD regulations require that the PHA comply with all equal opportunity requirements and it must affirmatively further fair housing goals in the administration of the program [24 CFR 960.103, PH Occ GB p. 13]. Adherence to the selection policies described in this chapter ensures that the PHA will be in compliance with all relevant fair housing requirements, as described in Chapter 2.

This chapter describes HUD and PHA policies for accepting applications, managing the waiting list and selecting families from the waiting list. The PHA's policies for assigning unit size and making unit offers are contained in Chapter 5. Together, Chapters 4 and 5 of the ACOP comprise the PHA's Tenant Selection and Assignment Plan (TSAP).

The policies outlined in this chapter are organized into three sections, as follows:

Part I: The Application Process. This part provides an overview of the application process, and discusses how applicants can obtain and submit applications. It also specifies how the PHA will handle the applications it receives.

Part II: Managing the Waiting List. This part presents the policies that govern how the PHA's waiting list is structured, when it is opened and closed, and how the public is notified of the opportunity to apply for public housing. It also discusses the process the PHA will use to keep the waiting list current.

Part III: Tenant Selection. This part describes the policies that guide the PHA in selecting families from the waiting list as units become available. It also specifies how in-person interviews will be used to ensure that the PHA has the information needed to make a final eligibility determination.

## **PART I: THE APPLICATION PROCESS**

### **4-I.A. OVERVIEW**

This part describes the policies that guide the PHA's efforts to distribute and accept applications, and to make preliminary determinations of applicant family eligibility that affect placement of the family on the waiting list. This part also describes the PHA's obligation to ensure the accessibility of the application process.

### **4-I.B. APPLYING FOR ASSISTANCE**

Any family that wishes to reside in public housing must apply for admission to the program [24 CFR 1.4(b)(2)(ii), 24 CFR 960.202(a)(2)(iv), and PH Occ GB, p. 68]. HUD permits the PHA to determine the format and content of its applications, as well how such applications will be made available to interested families and how applications will be accepted by the PHA. However, the PHA must include Form HUD-92006, Supplement to Application for Federally Assisted Housing, as part of the PHA's application [Notice PIH 2009-36].

#### **HACD Policy**

Depending upon the length of time between the date of application and the availability of housing, the PHA may use a one- or two-step application process.

A one-step process will be used when it is expected that a family will be selected from the waiting list within 60 days of the date of application. At application, the family must provide all of the information necessary to establish family eligibility and the amount of rent the family will pay.

A two-step process will be used when it is expected that a family will not be selected from the waiting list for at least 60 days from the date of application. Under the two-step application process, the PHA initially will require families to provide only the information needed to make an initial assessment of the family's eligibility, and to determine the family's placement on the waiting list. The family will be required to provide all of the information necessary to establish family eligibility and the amount of rent the family will pay when selected from the waiting list.

Families may obtain application forms from the PHA's website. By reasonable accommodation families may also request – by telephone or by mail – that an application form be sent to the family via first class mail.

Completed online applications must be submitted to the PHA through its online application system. Applications must be complete in order to be accepted by the PHA for processing. Reasonable accommodation applications must be filled out completely and submitted to the PHA in person or via first class mail. If an application is incomplete, the PHA will notify the family of the additional information required.

#### **4-I.C. ACCESSIBILITY OF THE APPLICATION PROCESS**

The PHA must take a variety of steps to ensure that the application process is accessible to those people who might have difficulty complying with the standard PHA application process.

##### **Disabled Populations [24 CFR 8; PH Occ GB, p. 68]**

The PHA must provide reasonable accommodation as needed for persons with disabilities to make the application process fully accessible. The facility where applications are accepted and the application process must be fully accessible or the PHA must provide an alternate approach that provides equal access to the program. Chapter 2 provides a full discussion of the PHA's policies related to providing reasonable accommodations for people with disabilities.

##### **Limited English Proficiency**

PHAs are required to take reasonable steps to ensure meaningful access to their programs and activities by persons with limited English proficiency [24 CFR 1]. Chapter 2 provides a full discussion on the PHA's policies related to ensuring access to people with limited English proficiency (LEP).

#### **4-I.D. PLACEMENT ON THE WAITING LIST**

The PHA must review each completed application received and make a preliminary assessment of the family's eligibility. Applicants for whom the waiting list is open must be placed on the waiting list unless the PHA determines the family to be ineligible. Where the family is determined to be ineligible, the PHA must notify the family in writing [24 CFR 960.208(a); PH Occ GB, p. 41].

No applicant has a right or entitlement to be listed on the waiting list, or to any particular position on the waiting list.

#### **Ineligible for Placement on the Waiting List**

##### **HACD Policy**

If the PHA determines from the information provided that a family is ineligible, the family will not be placed on the waiting list. When a family is determined to be ineligible, the PHA will send written notification of the ineligibility determination within a reasonable amount of time of receipt of the completed application. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal hearing and explain the process for doing so (see Chapter 14).

#### **Eligible for Placement on the Waiting List**

##### **HACD Policy**

The PHA will send written notification of the preliminary eligibility determination within a reasonable amount of time of receiving a completed application. If applicable, the notice will also indicate the waiting list preference(s) for which the family appears to qualify.

Applicants will be placed on the waiting list according to PHA preference(s) and the date and time their complete application is received by the PHA.

The PHA will assign families on the waiting list according to the bedroom size for which a family qualifies as established in its occupancy standards (see Chapter 5). Families may request to be placed on the waiting list for a unit size smaller than designated by the occupancy guidelines (as long as the unit is not overcrowded according to PHA standards and local codes). However, in these cases, the family must agree not to request a transfer for two years after admission, unless they have a change in family size or composition.

Placement on the waiting list does not indicate that the family is, in fact, eligible for admission. When the family is selected from the waiting list, the PHA will verify any preference(s) claimed and determine eligibility and suitability for admission to the program.

## **PART II: MANAGING THE WAITING LIST**

### **4-II.A. OVERVIEW**

The PHA must have policies regarding the type of waiting list it will utilize as well as how the waiting list will be organized and managed. This includes policies on notifying the public on the opening and closing of the waiting list to new applicants, updating family information, purging the list of families that are no longer interested in or eligible for public housing, and conducting outreach to ensure a sufficient number of applicants.

In addition, HUD imposes requirements on how the PHA may structure its waiting list and how families must be treated if they apply for public housing at a PHA that administers more than one assisted housing program.

### **4-II.B. ORGANIZATION OF THE WAITING LIST**

The PHA's public housing waiting list must be organized in such a manner to allow the PHA to accurately identify and select families in the proper order, according to the admissions policies described in this ACOP.

#### **HACD Policy**

The waiting list will contain the following information for each applicant listed:

- Name and social security number of head of household
- Unit size required (number of family members)
- Amount and source of annual income
- Accessibility requirement, if any
- Date and time of application or application number
- Household type (family, elderly, disabled)
- Admission preference, if any
- Race and ethnicity of the head of household
- The specific site(s) selected (only if PHA offers site-based waiting lists)



The PHA may adopt one community-wide waiting list or site-based waiting lists. The PHA must obtain approval from HUD through submission of its Annual Plan before it may offer site-based waiting lists. Site-based waiting lists allow families to select the development where they wish to reside and must be consistent with all applicable civil rights and fair housing laws and regulations [24 CFR 903.7(b)(2)].

**HACD Policy**

The PHA will maintain one single community-wide waiting list for its developments. Within the list, the PHA will designate subparts to easily identify who should be offered the next available unit (i.e. mixed populations, general occupancy, unit size, and accessible units).

The PHA may adopt site-based waiting lists.

HUD requires that public housing applicants must be offered the opportunity to be placed on the waiting list for any tenant-based or project-based voucher or moderate rehabilitation program that the PHA operates if 1) the other programs' waiting lists are open, and 2) the family is qualified for the other programs [24 CFR 982.205(a)(2)(i)].

HUD permits, but does not require, that PHAs maintain a single merged waiting list for their public housing, Section 8, and other subsidized housing programs [24 CFR 982.205(a)(1)].

**HACD Policy**

The PHA will not merge the public housing waiting list with the waiting list for any other program the PHA operates.

## **4-II.C. OPENING AND CLOSING THE WAITING LIST**

### **Closing the Waiting List**

The PHA is permitted to close the waiting list, in whole or in part, if it has an adequate pool of families to fully lease units in all of its developments. The PHA may close the waiting list completely, or restrict intake by preference, type of project, or by size and type of dwelling unit. [PH Occ GB, p. 31].

#### **HACD Policy**

The PHA will close the waiting list when the estimated waiting period for housing applicants on the list reaches 24 months for the most current applicants. Where the PHA has particular preferences or other criteria that require a specific category of family, the PHA may elect to continue to accept applications from these applicants while closing the waiting list to others.

### **Reopening the Waiting List**

If the waiting list has been closed, it may be reopened at any time. The PHA should publish a notice announcing the opening of the waiting list in local newspapers of general circulation, minority media, and other suitable media outlets. Such notice must comply with HUD fair housing requirements. The PHA should specify who may apply, and where and when applications will be received.

#### **HACD Policy**

The PHA will announce the reopening of the waiting list at least 10 business days prior to the date applications will first be accepted. If the list is only being reopened for certain categories of families, this information will be contained in the notice. The notice will specify where, when, and how applications are to be received.

The PHA will give public notice by publishing the relevant information in suitable media outlets including, but not limited to:

*Housing Authority Website*

*The Daily Chronicle*

*The Midweek*

*Social Media (i.e. Facebook)*

#### **4-II.D. FAMILY OUTREACH [24 CFR 903.2(d); 24 CFR 903.7(a) and (b)]**

The PHA should conduct outreach as necessary to ensure that the PHA has a sufficient number of applicants on the waiting list to fill anticipated vacancies and to assure that the PHA is affirmatively furthering fair housing and complying with the Fair Housing Act.

Because HUD requires the PHA to admit a specified percentage of extremely low income families, the PHA may need to conduct special outreach to ensure that an adequate number of such families apply for public housing.

PHA outreach efforts must comply with fair housing requirements. This includes:

- Analyzing the housing market area and the populations currently being served to identify underserved populations
- Ensuring that outreach efforts are targeted to media outlets that reach eligible populations that are underrepresented in the program
- Avoiding outreach efforts that prefer or exclude people who are members of a protected class

PHA outreach efforts must be designed to inform qualified families about the availability of units under the program. These efforts may include, as needed, any of the following activities:

- Submitting press releases to local newspapers, including minority newspapers
- Developing informational materials and flyers to distribute to other agencies
- Providing application forms to other public and private agencies that serve the low income population
- Developing partnerships with other organizations that serve similar populations, including agencies that provide services for persons with disabilities

##### **HACD Policy**

The PHA will monitor the characteristics of the population being served and the characteristics of the population as a whole in the PHA's jurisdiction. Targeted outreach efforts will be undertaken if a comparison suggests that certain populations are being underserved.

#### **4-II.E. REPORTING CHANGES IN FAMILY CIRCUMSTANCES**

##### **HACD Policy**

While the family is on the waiting list, the family must inform the PHA, within 10 business days, of changes in family size or composition, preference status, or contact information, including current residence, mailing address, email address, and phone number. The changes must be submitted in writing.

Changes in an applicant's circumstances while on the waiting list may affect the family's qualification for a particular bedroom size or entitlement to a preference. When an applicant reports a change that affects their placement on the waiting list, the waiting list will be updated accordingly.

#### **4-II.F. UPDATING THE WAITING LIST**

HUD requires the PHA to establish policies that describe the circumstances under which applicants will be removed from the waiting list [24 CFR 960.202(a)(2)(iv)].

##### **Purging the Waiting List**

The decision to remove an applicant family that includes a person with disabilities from the waiting list is subject to reasonable accommodation. If the applicant did not respond to the PHA's request for information or updates because of the family member's disability, the PHA must, upon the family's request, reinstate the applicant family to their former position on the waiting list as a reasonable accommodation [24 CFR 8.4(a), 24 CFR 100.204(a), and PH Occ GB, p. 39 and 40]. See Chapter 2 for further information regarding reasonable accommodations.

##### **HACD Policy**

The waiting list will be updated as needed to ensure that all applicant information is current and timely.

To update the waiting list, the PHA will send a written update request to families on the waiting list to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the current address that the PHA has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list.

The family's response must be in writing and may be delivered in person, by mail, by email or fax. Responses should be postmarked or received by the PHA not later than 15 business days from the date of the PHA letter.

If the family fails to respond within 15 business days, the family will be removed from the waiting list without further notice. HACD does not accept responsibility for mail delays.

If the notice is returned by the post office, the applicant will be removed from the waiting list without further notice.

Notification of a change in address to the US Post Office or sources other than HACD is not considered compliance with the requirement to notify HACD.

If a family is removed from the waiting list during the update process for failure to respond, no informal hearing will be offered. Such failures to act on the part of the applicant prevent the PHA from making an eligibility determination; therefore no informal hearing is required.

If a family is removed from the waiting list for failure to respond, the PHA may reinstate the family if the lack of response was due to PHA error, or to circumstances beyond the family's control.

## **Removal from the Waiting List**

### **HACD Policy**

The PHA will remove an applicant from the waiting list upon request by the applicant family. In such cases no informal hearing is required.

If the PHA determines that the family is not eligible for admission (see Chapter 3) at any time while the family is on the waiting list the family will be removed from the waiting list.

If a family is removed from the waiting list because the PHA has determined the family is not eligible for admission, a notice will be sent to the family's address of record as well as to any alternate address provided on the initial application. The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal hearing regarding the PHA's decision (see Chapter 14) [24 CFR 960.208(a)].

## **PART III: TENANT SELECTION**

### **4-III.A. OVERVIEW**

The PHA must establish tenant selection policies for families being admitted to public housing [24 CFR 960.201(a)]. The PHA must not require any specific income or racial quotas for any developments [24 CFR 903.2(d)]. The PHA must not assign persons to a particular section of a community or to a development or building based on race, color, religion, sex, disability, familial status or national origin for purposes of segregating populations [24 CFR 1.4(b)(1)(iii) and 24 CFR 903.2(d)(1)].

The order in which families will be selected from the waiting list depends on the selection method chosen by the PHA and is impacted in part by any selection preferences that the family qualifies for. The availability of units also may affect the order in which families are selected from the waiting list.

The PHA must maintain a clear record of all information required to verify that the family is selected from the waiting list according to the PHA's selection policies [24 CFR 960.206(e)(2)]. The PHA's policies must be posted any place where the PHA receives applications. The PHA must provide a copy of its tenant selection policies upon request to any applicant or tenant. The PHA may charge the family for providing a copy of its tenant selection policies [24 CFR 960.202(c)(2)].

#### **HACD Policy**

When an applicant or resident family requests a copy of the PHA's tenant selection policies, the PHA will provide copies to them free of charge.

#### **4-III.B. SELECTION METHOD**

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the PHA will use.

##### **Local Preferences [24 CFR 960.206]**

PHAs are permitted to establish local preferences and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources [24 CFR 960.206(a)].

##### **HACD Policy**

To accomplish the mission of the Housing Authority of the County of DeKalb, HACD will strive to provide housing to all persons in DeKalb County who require housing assistance as of the date of their application. Acknowledging that the resources available to provide housing are limited, the HACD Board of Commissioners has established preferences for admission to HACD housing programs. All preferences will be given with consideration to the resources available to HACD and as long as the preferences do not jeopardize the financial stability of HACD programs.

The Housing Authority of the County of DeKalb will adhere to all program admission guidelines established by the funding source where those admission guidelines, by contract, supersede local guidelines.

The Housing Authority of the County of DeKalb will use the local preferences as noted in exhibit 4-1.

##### **Income Targeting Requirement [24 CFR 960.202(b)]**

HUD requires that extremely low-income (ELI) families make up at least 40 percent of the families admitted to public housing during the PHA's fiscal year. ELI families are those with annual incomes at or below the federal poverty level or 30 percent of the area median income, whichever number is higher [*Federal Register* notice 6/25/14]. To ensure this requirement is met, the PHA may skip non-ELI families on the waiting list in order to select an ELI family.

If a PHA also operates a housing choice voucher (HCV) program, admissions of extremely low-income families to the PHA's HCV program during a PHA fiscal year that exceed the 75 percent minimum target requirement for the voucher program, shall be credited against the PHA's basic targeting requirement in the public housing program for the same fiscal year. However, under these circumstances the fiscal year credit to the public housing program must not exceed the lower of: (1) ten percent of public housing waiting list admissions during the PHA fiscal year; (2) ten percent of waiting list admissions to the PHA's housing choice voucher program during the PHA fiscal year; or (3) the number of qualifying low-income families who commence occupancy during the fiscal year of PHA public housing units located in census tracts with a poverty rate of 30 percent or more. For this purpose, qualifying low-income family means a low-income family other than an extremely low-income family.



**HACD Policy**

The PHA will monitor progress in meeting the ELI requirement throughout the fiscal year. ELI families will be selected ahead of other eligible families on an as-needed basis to ensure that the income targeting requirement is met.

### **Mixed Population Developments [24 CFR 960.407]**

A mixed population development is a public housing development or portion of a development that was reserved for elderly families and disabled families at its inception (and has retained that character) or the PHA at some point after its inception obtained HUD approval to give preference in tenant selection for all units in the development (or portion of a development) to elderly and disabled families [24 CFR 960.102]. Elderly family means a family whose head, spouse, cohead, or sole member is a person who is at least 62 years of age. Disabled family means a family whose head, spouse, cohead, or sole member is a person with disabilities [24 CFR 5.403]. The PHA must give elderly and disabled families equal preference in selecting these families for admission to mixed population developments. The PHA may not establish a limit on the number of elderly or disabled families that may occupy a mixed population development. In selecting elderly and disabled families to fill these units, the PHA must first offer the units that have accessibility features for families that include a person with a disability and require the accessibility features of such units. The PHA may not discriminate against elderly or disabled families that include children (Fair Housing Amendments Act of 1988).

### **Units Designated for Elderly or Disabled Families [24 CFR 945]**

The PHA may designate projects or portions of a public housing project specifically for elderly or disabled families. The PHA must have a HUD-approved allocation plan before the designation may take place.

Among the designated developments, the PHA must also apply any preferences that it has established. If there are not enough elderly families to occupy the units in a designated elderly development, the PHA may allow near-elderly families to occupy the units [24 CFR 945.303(c)(1)]. Near-elderly family means a family whose head, spouse, or cohead is at least 50 years old, but is less than 62 [24 CFR 5.403].

If there are an insufficient number of elderly families and near-elderly families for the units in a development designated for elderly families, the PHA must make available to all other families any unit that is ready for re-rental and has been vacant for more than 60 consecutive days [24 CFR 945.303(c)(2)].

The decision of any disabled family or elderly family not to occupy or accept occupancy in designated housing shall not have an adverse affect on their admission or continued occupancy in public housing or their position on or placement on the waiting list. However, this protection does not apply to any family who refuses to occupy or accept occupancy in designated housing because of the race, color, religion, sex, disability, familial status, or national origin of the occupants of the designated housing or the surrounding area [24 CFR 945.303(d)(1) and (2)].

This protection does apply to an elderly family or disabled family that declines to accept occupancy, respectively, in a designated project for elderly families or for disabled families, and requests occupancy in a general occupancy project or in a mixed population project [24 CFR 945.303(d)(3)].

### **HACD Policy**

The PHA does not have designated elderly or designated disabled housing at this time.

## **Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2]**

The PHA's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of the PHA's deconcentration policies must be included in its annual plan [24 CFR 903.7(b)].

The PHA's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

### ***Steps for Implementation [24 CFR 903.2(c)(1)]***

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, the PHA must comply with the following steps:

Step 1. The PHA must determine the average income of all families residing in all the PHA's covered developments. The PHA may use the median income, instead of average income, provided that the PHA includes a written explanation in its annual plan justifying the use of median income.

#### **HACD Policy**

The PHA will determine the average income of all families in all covered developments on an annual basis.

Step 2. The PHA must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, the PHA has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

#### **HACD Policy**

The PHA will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

Step 3. The PHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low income family (federal poverty level or 30percent of median income, whichever number is higher).

Step 4. The PHA with covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.

Step 5. Where the income profile for a covered development is not explained or justified in the annual plan submission, the PHA must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances the PHA's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration
- Providing other strategies permitted by statute and determined by the PHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and PHA strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under the PHA's deconcentration policy. The PHA must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the PHA's deconcentration policy [24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, the PHA will be considered to be in compliance with the deconcentration requirement and no further action is required.

### **HACD Policy**

For developments outside the EIR the PHA will take the following actions to provide for deconcentration of poverty and income mixing:

The PHA will strive to create mixed-income communities and lessen the concentration of very-low income families within the Housing Authority's public housing developments through admissions policies designed to bring higher income tenants into lower income developments and lower income tenants into higher income developments. This policy shall not be construed to impose or require any specific income or racial quotas for any public housing development owned by the PHA.

**Order of Selection [24 CFR 960.206(e)]**

The PHA system of preferences may select families either according to the date and time of application or by a random selection process.

**HACD Policy**

Families will be selected from the waiting list based on preference. Among applicants with the same preference, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the PHA.

When selecting applicants from the waiting list, the PHA will match the characteristics of the available unit (unit size, accessibility features, unit type) to the applicants on the waiting lists. The PHA will offer the unit to the highest ranking applicant who qualifies for that unit size or type, or that requires the accessibility features.

By matching unit and family characteristics, it is possible that families who are lower on the waiting list may receive an offer of housing ahead of families with an earlier date and time of application or higher preference status.

Factors such as deconcentration or income mixing and income targeting will also be considered in accordance with HUD requirements and PHA policy.

#### **4-III.C. NOTIFICATION OF SELECTION**

When the family has been selected from the waiting list, the PHA must notify the family [24 CFR 960.208].

##### **HACD Policy**

The PHA will notify the family in writing when it is selected from the waiting list.

The notice will inform the family of the following:

- Date, time, and location of the scheduled application interview, including any procedures for rescheduling the interview

- Who is required to attend the interview

- Documents that must be provided at the interview to document the legal identity of household members, including information about what constitutes acceptable documentation

- Documents that must be provided at the interview to document eligibility for a preference, if applicable

- Other documents and information that should be brought to the interview

If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list without further notice. Such failure to act on the part of the applicant prevents the PHA from making an eligibility determination; therefore no informal hearing will be offered.

#### **4-III.D. THE APPLICATION INTERVIEW**

HUD recommends that the PHA obtain the information and documentation needed to make an eligibility determination through a private interview. Being invited to attend an interview does not constitute admission to the program.

Assistance cannot be provided to the family until all SSN documentation requirements are met. However, if the PHA determines that an applicant family is otherwise eligible to participate in the program, the family may retain its place on the waiting list for a period of time determined by the PHA [Notice PIH 2018-24].

Reasonable accommodation must be made for persons with disabilities who are unable to attend an interview due to their disability [24 CFR 8.4(a) and 24 CFR 100.204(a)].

##### **HACD Policy**

Families selected from the waiting list are required to participate in an eligibility interview.

The head of household and the spouse/cohead will be strongly encouraged to attend the interview together. However, either the head of household or the spouse/cohead may attend the interview on behalf of the family. Verification of information pertaining to adult members of the household not present at the interview will not begin until signed release forms are returned to the PHA.

The interview will be conducted only if the head of household or spouse/cohead provides appropriate documentation of legal identity (Chapter 7 provides a discussion of proper documentation of legal identity). If the family representative does not provide the required documentation, the appointment may be rescheduled when the proper documents have been obtained.

Pending disclosure and documentation of social security numbers, the PHA will allow the family to retain its place on the waiting list for 10 days after eligibility interview. If not all household members have disclosed their SSNs at the next time a unit becomes available, the PHA will offer a unit to the next eligible applicant family on the waiting list.

If the family is claiming a waiting list preference, the family must provide documentation to verify their eligibility for a preference (see Chapter 7). If the family is verified as eligible for the preference, the PHA will proceed with the interview. If the PHA determines the family is not eligible for the preference, the interview will not proceed and the family will be placed back on the waiting list according to the date and time of their application.

The family must provide the information necessary to establish the family's eligibility, including suitability, and to determine the appropriate amount of rent the family will pay. The family must also complete required forms, provide required signatures, and submit required documentation. If any materials are missing, the PHA will provide the family with a written list of items that must be submitted.

Any required documents or information that the family is unable to provide at the interview must be provided within 10 business days of the interview (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of Social Security numbers and eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (see Chapter 3).

An advocate, interpreter, or other assistant may assist the family with the application and the interview process.

Interviews will be conducted in English. For limited English proficient (LEP) applicants, the PHA will provide translation services in accordance with the PHA's LEP plan.

If the family is unable to attend a scheduled interview, the family should contact the PHA in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend a scheduled interview, the PHA will send another notification letter with a new interview appointment time. Applicants who fail to attend two scheduled interviews without PHA approval will have their applications made inactive based on the family's failure to supply information needed to determine eligibility. The second appointment letter will state that failure to appear for the appointment without a request to reschedule will be interpreted to mean that the family is no longer interested and their application will be made inactive. Such failure to act on the part of the applicant prevents the PHA from making an eligibility determination, therefore the PHA will not offer an informal hearing.



#### **4-III.E. FINAL ELIGIBILITY DETERMINATION [24 CFR 960.208]**

The PHA must verify all information provided by the family (see Chapter 7). Based on verified information related to the eligibility requirements, including PHA suitability standards, the PHA must make a final determination of eligibility (see Chapter 3).

When a determination is made that a family is eligible and satisfies all requirements for admission, including tenant selection criteria, the applicant must be notified of the approximate date of occupancy insofar as that date can be reasonably determined [24 CFR 960.208(b)].

##### **HACD Policy**

The PHA will notify a family in writing of their eligibility within 10 business days of the determination and will provide the approximate date of occupancy insofar as that date can be reasonably determined.

The PHA must promptly notify any family determined to be ineligible for admission of the basis for such determination, and must provide the applicant upon request, within a reasonable time after the determination is made, with an opportunity for an informal hearing on such determination [24 CFR 960.208(a)].

##### **HACD Policy**

If the PHA determines that the family is ineligible, the PHA will send written notification of the ineligibility determination within 10 business days of the determination. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal hearing (see Chapter 14).

If the PHA uses a criminal record or sex offender registration information obtained under 24 CFR 5, Subpart J, as the basis of a denial, a copy of the record must precede the notice to deny, with an opportunity for the applicant to dispute the accuracy and relevance of the information before the PHA can move to deny the application. See Section 3-III.G for the PHA's policy regarding such circumstances.

Upon making an eligibility determination, the PHA must provide the family a notice of VAWA rights as well as the HUD VAWA self-certification form (form HUD-5382) in accordance with the Violence against Women Act of 2013, and as outlined in 16-VII.C. The notice and self-certification form must accompany the written notification of eligibility determination. This notice must be provided in both of the following instances: (1) when a family is notified of its eligibility; or (2) when a family is notified of its ineligibility.

## Exhibit 4-1: Local Preferences

Acknowledging that the resources to provide housing are limited, the Housing Authority of the County of DeKalb has established local preferences for admission to its programs. The Housing Authority of the County of DeKalb will select families based on the following local preference system, within each bedroom size category for Low-Income Public Housing, and generally for the Housing Choice Voucher/Section 8 Program. **Families and individuals will be selected from the waiting list according to total preference points and the date and time their application is received by the PHA.**

**PREFERENCE 1: DeKalb County Residency (2 points):** The residency preference will be applied when the applicant household can demonstrate that their primary physical residence is in DeKalb County, Illinois. Physical residence shall be defined as a domicile with a mailing address, other than a post office box, OR the applicant family has the head, or spouse or sole member working or the head, spouse or sole member has been hired to work within DeKalb County, Illinois.

**Verification:** Residency will be verified when the applicant can produce three or more of the following: current lease, utility bills showing the current physical address, medical bills, DHS benefits verified within DeKalb County, Illinois, child/children's enrollment in DeKalb County school, signed statement from employer indicating dates of employment, or 3 items of mail such as car insurance bill, cell phone bill, credit card statement, etc. The mail items presented for proof of residency must be post marked within the last 30 days, and original pieces of mail must be provided. Handwritten or typed address on an envelope will not be accepted.

**PREFERENCE 2: Family Preference (1 Point):** An applicant household is considered eligible for this preference if either head or spouse has legal custody of a minor child or children. This preference is also extended to applicant households whose head of household, spouse or sole-member are ELDERLY (age 62 or older) or DISABLED (have a verified disability).

**Verification:** Verification of the family preference is verified via confirmation of birth records, foster parent certifications through legal certifications, legal adoption records, etc. This preference is also extended to all households whose head, spouse or sole member is 62 or older or receiving income based on their disability. Verification of disability is accomplished through a current Social Security Disability Benefit letter or via Disability Verification from a licensed care provider i.e. physician, counselor, case manager, psychiatrist, psychologist, psychoanalyst, psychotherapist ..., etc.

**PREFERENCE 3: Working Preference (1 point):** An applicant household is considered eligible for this preference if either head, spouse or sole member is employed and working. This preference is also extended to the applicant households whose head of household, spouse or sole-member is ELDERLY (age 62 or older) or DISABLED (have a verified disability).

**Verification:** Employment will be verified by at least 4 current, consecutive paycheck stubs, signed statement from employer indicating dates of employment, number of hours working, hourly wages, and anticipation of continuous employment or verification through theworknumber.com. This preference is also extended to all elderly families and all families whose head, spouse or sole member is receiving income based on their disability. Verification of disability is accomplished through a current Social Security Disability Benefit letter or via Disability Verification from a licensed care provider i.e. physician, counselor, case manager, psychiatrist, psychologist, psychoanalyst, psychotherapist, etc.

**PREFERENCE 4: Rent Burden (1 point):** In order to qualify for this preference, the applicant household must be paying more than 50% of total household income for rent and utilities. An applicant household does not qualify for a rent burden preference if either of the following is applicable:

- a. The applicant household has been paying more than 50% of total household income for rent and utilities for less than 90 days.
- b. The applicant household is paying more than 50% of total household income to rent a unit because the applicant's housing assistance for occupancy of the unit under any of the following programs has been terminated as a result of the applicant's refusal to comply with applicable program policies and procedures on the occupancy of under occupied and overcrowded units:
  1. Section 8 programs or Public or Indian Housing Programs under the United States Housing Act of 1965; or
  2. The rent supplement program under section 101 of the Housing and Urban Development Act of 1965; or
  3. Rental assistance payments under section 236(f)(2) of the National Housing Act.

"Family income" is monthly income as defined in 24 CFR 5.609.

"Rent" is defined as the actual amount due under a lease or occupancy agreement calculated on a monthly basis plus the utility allowance for family-purchased utilities and services that is used in the PHA tenant-based program, or if the family chooses, the average monthly payment that the family actually purchased directly from utility providers for the most recent six-month period.

If an applicant owns a mobile home, but rents the space upon which it is located, then "rent" will include the monthly payments made to amortize the purchase price of the home.

Members of a cooperative are "renters" for the purposes of qualifying for the preference. In this case, "rent" would mean the charges under the occupancy agreement.

**Verification (Income, Rent, Utilities):** Income will be verified in accordance with existing procedures used to verify income to determine eligibility. Amounts due under a lease or occupancy agreement will be verified by requiring the family to furnish copies of an executed rental agreement, canceled checks or rent receipts for the most recent six-month period, a copy of current purchase agreement, or by contacting the lien holder or landlord direct. Utility payments will be verified by presenting copies of canceled checks, utility bills or receipts for the most recent six-month period.

**PREFERENCE 5: DeKalb County Continuum of Care Preference (1 point):** The DeKalb County Continuum of Care Preference is given to Applicant families, otherwise eligible, who are currently residing in Emergency Shelter, Transitional Shelter, Permanent Supportive housing OR participating at/in/through a participating DeKalb County Continuum of Care agency (at the time of verification) and have received a written letter of recommendation not less than 30 days old from a participating DeKalb County Continuum of Care agency.

**Verification:** A written letter of recommendation from a participating DeKalb County CoC agency, not less than 30 days old, confirming the eligible applicant's current successful program participation, services received, and demonstrates that the family or individual is housing ready and can maintain successful lease compliance (low risk of homeless recidivism).

**Certifications of Compliance with  
PHA Plans and Related Regulations  
(Standard, Troubled, HCV-Only, and  
High Performer PHAs)**

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 02/29/2016  
Resolution 20-17

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

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the X 5-Year and/or X Annual PHA Plan for the PHA fiscal year beginning 4/1/2020, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:*

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
  - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

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

**The Housing Authority of the County of DeKalb**

PHA Name

**IL089**

PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2020

5-Year PHA Plan for Fiscal Years 2020 - 2025

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 <i>AGAPITA Smith</i>	Title <i>Vice-Chair Person</i>
Signature <i>Agapita P. Smith</i>	Date <i>12/17/19</i>

**ALL PROPERTIES  
2020 RESIDENT PREFERENCE SURVEY RESULTS**

Questions	Response				Total
	Very Satisfied	Satisfied	Dissatisfied	Blank	
1. How Satisfied are you with the apartment/ building	36%	49%	12%	4%	100%
2. Over the last year how many times have you called for Maintenance or repairs.	Never	1-2 Times	3 or More	Blank	100%
3. How satisfied are you with the Maintenance Staff?	Very Satisfied	Satisfied	Dissatisfied	Blank	100%
4. How satisfied are you with the Property Manager	Very Satisfied	Satisfied	Dissatisfied	Blank	100%
5. How satisfied are you with the Case Manager?	Very Satisfied	Satisfied	Dissatisfied	Blank	100%
6. Do you think management is responsive to your questions and concerns?	Very Satisfied	Satisfied	Dissatisfied	Blank	100%
7. Do you think management is courteous and professional with you?	Very Satisfied	Satisfied	Dissatisfied	Blank	100%
8. How safe do you feel from crime	Very Safe	Safe	Unsafe	Blank	100%
9. How long have lived in your housing property?	Less than 6 months	6-Months	2 Yrs or More	Blank	100%

TSP - 64/150 = 43%  
Civic - 35/74 = 46%  
Lewis - 2/14 = 14%

Mason - 7/26 = 27%  
Garden - 2/16 = 13%  
Total - 110/280 Responses for 39%

**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

B.1

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

I, Bill Nicklas, the City Manager for the City of DeKalb  
*Official's Name* *Official's Title*

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

**The Housing Authority of the County of DeKalb**

*PHA Name*

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

**City of DeKalb**

*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 PHA Plan is consistent with the City of DeKalb's Consolidated Plan. HACD and COD work  
together on affordable housing needs using the PHA as a resource for HUD related housing  
programs. HACD and the COD are also participants in the Continuum of Care.

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

Bill Nicklas

Title

City Manager

Signature



Date

10/30/19



<b>5-Year PHA Plan (for All PHAs)</b>	<b>U.S. Department of Housing and Urban Development Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226 Expires: 02/29/2016</b>
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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-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

<b>A.</b>	<b>PHA Information.</b>																																				
<b>A.1</b>	<p> <b>PHA Name:</b> <u>The Housing Authority of the County of DeKalb</u> <span style="float: right;"><b>PHA Code:</b> <u>IL089</u></span> </p> <p> <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>04/2020</u>  <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission </p> <p> <b>Availability of Information.</b> In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p style="color: red;"> <i>All PHA Plan items and elements can be found on our website at <a href="http://dekcohousing.com/resources/policies/">http://dekcohousing.com/resources/policies/</a>. Full copies of plans and policies governing programs are detailed here and available to the public. Additionally, we provide two computers available to the public in our waiting room for access to all PHA items.</i> </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" data-bbox="204 1276 1463 1908"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>					Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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<b>B.</b>	<b>5-Year Plan.</b> Required for <u>all</u> PHAs completing this form.
<b>B.1</b>	<p><b>Mission.</b> State the PHA’s mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA’s jurisdiction for the next five years.</p> <p><i>Positively impact lower income people by providing affordable housing</i></p>
<b>B.2</b>	<p><b>Goals and Objectives.</b> Identify the PHA’s quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years.</p> <p><i>See B.2 Attachment</i></p>
<b>B.3</b>	<p><b>Progress Report.</b> Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.</p> <p><i>See B.3 Attachment</i></p>
<b>B.4</b>	<p><b>Violence Against Women Act (VAWA) Goals.</b> Provide a statement of the PHA’s goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.</p> <p><i>See B.4 Attachment</i></p>
<b>B.5</b>	<p><b>Significant Amendment or Modification.</b> Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.</p> <p><i>See B.5 Attachment</i></p>
<b>B.6</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) provide comments to the 5-Year PHA Plan?</p> <p>Y    N  <input checked="" type="checkbox"/>   <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p><i>See B.6 Attachment</i></p>
<b>B.7</b>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <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>

# The Housing Authority of the County of DeKalb

## General Goals

2020 – 2024

B. 2

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**Goal One: High quality maintenance of properties**

- Proactively use HUD or non-HUD funds for modernization, energy efficiency and preventative maintenance.
- Revise and implement annual high-quality preventative maintenance plan.
- Perform annual UPCS 100% inspections.
- Achieve and Maintain High Performer PHAS status.
- Continue to seek alternative funding sources to use for capital improvements.

**Goal Two: Safety of tenants**

- Continue to work with residents, various agencies, and law enforcement to investigate and implement measures to improve public security through community involvement including adoption of an Emergency Response Handbook
- Maintain high quality surveillance systems.
- Maintain secure buildings with quality lighting and entry access systems.
- Continue to vigorously screen applicants and support crime free housing without violation of civil rights.
- Continue to vigorously enforce lease compliance to maintain a high-quality living environment.

**Goal Three: Responsiveness to tenants and voucher clients**

- Continue to promote fair housing and the opportunity for low income families of all cultural backgrounds to experience freedom of housing choice.
- Continue to improve and simplify procedures and systems for interfacing with tenants.
- Provide engaging and informative briefings to all new Section 8 Voucher holders that will provide a foundation for housing success.
- Provide engaging and informative public housing orientation and leasing information for all new tenants that will provide a foundation for housing success.
- Continue to provide open lines of communication through resident meetings, tenant meetings, website information and responsiveness from staff.
- Continue to survey tenants, landlords, staff and community stakeholders to ensure needs are being met.

**Goal Four: High perceived value and acceptance in the community**

- Continue to create positive public awareness and expand the level of tenant, owner, and community support in accomplishing the housing authority's mission.
- Promote housing programs which maintain quality service and integrity while providing an incentive to private property owners to rent to very low-income families.
- Continue to positively promote affordable housing by working with supportive service agencies, local government agencies, landlords, rental associations and more.
- Continue to build and improve our digital media (website, email blasts) to inform and assist both tenants and community members.
- Continue to promote housing authority resources throughout the community by networking and presenting our services and mission.

# The Housing Authority of the County of DeKalb

## General Goals

2020 – 2024

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- Continue to provide housing excellence through well maintained properties and high-quality staff with excellent customer service skills.
- Affirmatively furthering fair housing.

**Goal Five: Highly qualified, highly committed staff and board**

- Maintain a high level of standards and professionalism in our day-to-day management of all program components by fostering a “housing excellence” culture based upon the core values of:
  - Integrity
  - Commitment
  - Respect
  - Accountability
- Administer an efficient and high performing agency through continuous improvement of the housing authority's support systems, commitment to employees and their development.
- Recruit and train staff and board members who are committed to the housing authority’s mission.
- Provide the necessary tools, technology, training, and leadership necessary to maintain highly qualified and committed staff and board members.
- Engage in succession planning for the future staffing needs.
- Formalize and strengthen relationship with 501c3 (DCRDC) to assist in expanding housing opportunities.

**Goal Six: Data-driven operations**

- Increase the efficiency of the management functions for both Public Housing and Housing Choice Voucher Program through the use of tools for statistical measurements and monitoring work functions to ensure high quality and quantity of work.
- Effectively transition to the new housing management system (MRI) and maximize its efficiencies for tenants and staff.
- Increase staff communication and refine processes to increase efficiencies and to resolve problems quickly.

**Mission Statement**

Positively impact lower income people by providing affordable housing.

**Vision Statement**

HACD will be a national model of a progressive, efficient and caring public housing agency.

**B.3 Progress Report.** Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

The Authority has continued to manage its programs at a high level and High Performer Status. HACD continues to expand its pool of qualified HCV Landlords. The Authority continues to evaluate available data that addresses housing needs and continues to participate in the DeKalb Area Rental Association as leaders in providing quality housing and rental management. HACD continues to work closely with social service agencies along with educational institutions to help increase self-sufficiency and promote asset development to the assisted households served. The Authority continues to seek additional non-federal funding such as local contributors, diversification in revenue streams and monies from the U of I Energy Efficiency grant. The Authority partners with many local agencies and the community college to provide resources for tenants. The Authority has also partnered with the DeKalb County Community Action Department to conduct a “Social Living Group” for Public Housing Residents and provide service counseling for HCV Briefing participants. The Authority has also partnered with AID in providing many counseling and case management resources for improved quality of living. HACD has been awarded more than \$20K in non-federal funds to assist with tenant security deposits.

**Housing Authority of the County of DeKalb [HACD]  
Activities Under the Violence Against Women's Act [VAWA] of the.**

1. HACD strictly adheres to the protections provided to victims covered under the VAWA. Requirements and PHA Policies in three areas: notification, documentation and confidentiality. Specific VAWA requirements and PHA policies are detailed throughout the Housing Choice Voucher Administrative Plan and the Admissions and Continued Occupancy Policy, and specifically noted and defined in Section 16 – Program Administration.
2. Adhering to the Public Law 109-162, HACD's policies safeguard against denial of program assistance for an applicant or participant [that] is or has been a victim of domestic violence, dating violence, sexual assault or stalking, if the applicant otherwise qualifies for assistance or admission. This applies to all HACD housing programs.
3. HACD complies with all notification requirements by displaying VAWA materials at all administrative sites along with its website. All adverse action taken [denials or terminations] are compliant with VAWA notification requirements as stated in 24 CFR 5.20059(a).
4. The HACD Low-Income Public Housing program and the Section 8 Housing Choice Voucher program process enable HACD to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking by connecting families with local agencies and resources equipped with trained professionals able to assist with their needs. HACD exceeds this requirement by providing all applicants and program participants with the information of social service agencies specializing in abuse.
5. HACD provides notification of the VAWA in all Section 8 recertification and briefing materials and all Low-Income Public Housing admission and recertification materials.



## Housing Authority of the County of DeKalb

310 North Sixth Street • DeKalb, Illinois 60115

Phone 815.758.2692 • Fax 815.758.4190

www.dekcohousing.com

### HOUSING AUTHORITY SIGNIFICANT AMENDMENT SUBSTANTIAL DEVIATION/MODIFICATION

It is the intent of the Housing Authority to adhere to the mission, goals, and objectives outlined in the five-year plan. The plan, however, will be modified and re-submitted to HUD should a substantial deviation from program goals and objectives occur.

In accordance with 24 CFR 903.7 (r ) (2) which requires public housing Authorities to identify the basic criteria the agency will use to determine a substantial deviation from its 5-Year Plan and significant amendments or modification to the 5-Year Plan and Annual Plan, the following definitions are offered:

#### Significant Amendments/Substantial Deviation/Modifications

- An addition or deletion of a strategic goal(s) identified in the 5-Year Plan. For example, checking or unchecking a PHA goal box.
- Changes of a significant nature to the Admissions and Occupancy Policy or Section 8 Administrative Plan
- Any change regarding demolition or disposition, designation, homeownership programs or conversion activities.
- Additions of non-emergency work items (items not included in the current Annual Statement of Five-Year Action Plan)

#### A Substantial Deviation does not include:

- Any changes in HUD rules and regulations, which require or prohibit changes to activities listed herein.
- A need to respond immediately to Acts of God beyond the control of the Housing Authority, such as earthquakes, tornadoes, or other unforeseen significant events.



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### **2019-2020 Capital Fund PHA Annual Plan & PHA 5-Year Plan**

During the months of September and October 2019 HACD staff conducted resident meetings to discuss and solicit input on capital needs for all five HACD Public Housing Properties. Tenants provided input on desires for their respective buildings, reviewed the proposed projects and discussed overall operations of HACD. There were **NO CHALLENGED ELEMENTS** of the PHA Plan. HACD conducted a resident survey, a summation is on the following pages.

Resident Advisory Board Meetings were as follows:

- Taylor Street Plaza on August 28, 2019 from 11:00 A.M. to 1:00 P.M.
- Civic Apartments on September 11, 2019 from 11:00 A.M. to 1:00 P.M.
- Taylor Street Plaza on September 25, 2019 from 11:00 A.M. to 1:00 P.M.

The Public Hearing was held at our Central Office on December 4, 2019 at 2:00 P.M.



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**ALL PROPERTIES  
2020 RESIDENT PREFERENCE SURVEY RESULTS**

Questions	Response				Total
	Very Satisfied	Satisfied	Dissatisfied	Blank	
1. How Satisfied are you with the apartment/ building	36%	49%	12%	4%	100%
2. Over the last year how many times have you called for Maintenance or repairs.	Never	1-2 Times	3 or More	Blank	100%
3. How satisfied are you with the Maintenance Staff?	Very Satisfied	Satisfied	Dissatisfied	Blank	100%
4. How satisfied are you with the Property Manager	Very Satisfied	Satisfied	Dissatisfied	Blank	100%
5. How satisfied are you with the Case Manager?	Very Satisfied	Satisfied	Dissatisfied	Blank	100%
6. Do you think management is responsive to your questions and concerns?	Very Satisfied	Satisfied	Dissatisfied	Blank	100%
7. Do you think management is courteous and professional with you?	Very Satisfied	Satisfied	Dissatisfied	Blank	100%
8. How safe do you feel from crime	Very Safe	Safe	Unsafe	Blank	100%
9. How long have lived in your housing property?	Less than 6 months	6-Months 2 Yrs	2 Yrs or More	Blank	100%

TSP - 64/150 = 43%  
 Civic - 35/74 = 46%  
 Lewis - 2/14 = 14%

Mason - 7/26 = 27%  
 Garden - 2/16 = 13%  
 Total - 110/280 Responses for 39%

**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

B.1

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

I, Bill Nicklas, the City Manager for the City of DeKalb  
*Official's Name* *Official's Title*

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

**The Housing Authority of the County of DeKalb**

*PHA Name*

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

**City of DeKalb**

*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 PHA Plan is consistent with the City of DeKalb's Consolidated Plan. HACD and COD work  
together on affordable housing needs using the PHA as a resource for HUD related housing  
programs. HACD and the COD are also participants in the Continuum of Care.

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  
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Name of Authorized Official

Bill Nicklas

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Signature



Date

10/30/19