

**Public Comments to the Proposed Amendments to the FY2009 MTW Annual Plan, to the Amended And Restated MTW Agreement, and to the FY2007 Admissions And Continued Occupancy Policy**  
**Public Comment Period December 15 to January 13, 2009**

INDIVIDUAL OR ORGANIZATION	COMMENT	CHA RESPONSE
Robert Whitfield, on behalf of the Central Advisory Council	The CAC has no specific comment on, or objection to, the CHA implementing a local asset management public housing program. However, the CAC has no knowledge of how this program will operate, and or whether this "local" asset management program could result in standards that lead to more adverse reporting and evaluation of public housing sites than would have occurred under the HUD mandated asset management policies utilized by all other PHAs. This is important to the CAC because of potential consequences, such as the mandatory HUD conversion of properties with certain negative occupancy rates.	The Amendment gives the CHA certain fungibility and ability to deviate from HUD's asset management requirements. Local asset management provides that the CHA "will retain full authority to move MTW Funds and project cash flows among projects, without limitation under its local asset management program."
Robert Whitfield, on behalf of the Central Advisory Council	If the local asset management program developed by CHA staff puts more CHA properties at risk than would otherwise be the case under the HUD asset management process, will the CHA be able to quickly determine that fact, and conclude that its "local" asset management program should be adjusted or revised?	The MTW local asset management program gives the CHA the flexibility to mitigate risk. If deemed necessary, the CHA will make adjustments to its local asset management program.
Robert Whitfield, on behalf of the Central Advisory Council	The CAC is requesting that appropriate CHA staff meet with the CAC as soon as possible to further discuss the "local" asset management program.	The CHA will set-up a meeting with the CAC to speak about these issues and resolve any concerns.
Robert Whitfield, on behalf of the Central Advisory Council	The CAC is mainly concerned with the proposed revisions to Attachment D because the revision would delete the words "former public housing" from the second sentence in the first paragraph of Attachment D. This is significant because the current language only applies to an extremely small universe of the rental properties owned or controlled by the CHA. However, the proposed language means that many of the privately owned rental properties (where CHA has frequently provided project based Section 8 for some of the units), can now be counted towards the 25,000 units mandated by the Plan.	This provision applies to new or rehabilitated affordable housing units, where the developer has been awarded CHA administered project-based vouchers, since the beginning of the Plan for Transformation.
Robert Whitfield, on behalf of the Central Advisory Council	It is unclear whether this policy would apply going forward, or would also apply to privately owned units that were previously provided with CHA project based Section 8 for some of the rental units. For example, would this new language apply to Prairie Courts on South King Drive? Archer Courts?	This provision applies to new or rehabilitated affordable housing units, where the developer has been awarded CHA administered project-based vouchers, since the beginning of the Plan for Transformation. Therefore, the new language would apply to Prairie Courts, now known as South Park Plaza, but would not apply to Archer Courts because the project pre-dates the Plan and the Housing Assistance Payment (HAP) contract is administered by U.S. Department of Housing and Urban Development (HUD) directly, not the CHA.

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Robert Whitfield, on behalf of the Central Advisory Council	The CAC is concerned that the proposed policy to count project based Section 8 units towards the mandated 25,000 units may delay or eliminate the rights of some tenants. The CHA Relocation Rights Contract (RRC) has provisions that require CHA to provide relocatees with a new or rehabilitated public housing units. The CAC's position is that all lease holders covered by the RRC must be given a new or completely rehabilitated public housing unit; and that CHA may not require any CHA lease holder to accept a privately owned unit assisted by project based Section 8 as a unit under the RRC that satisfies the tenant's right to return.	The proposed policy will not delay or eliminate the rights of tenants under the RRC.  Residents who were lease compliant on 10/1/99 and have not satisfied their right of return will continue to have the option of a new or rehabilitated public housing unit or a Housing Choice Voucher. Residents may have an opportunity to elect a project-based voucher unit, but refusal of a project-based voucher unit will not affect their rights as tenants or their two offers guaranteed under the RRC.
Robert Whitfield, on behalf of the Central Advisory Council	The CAC takes the position that if a tenant covered by the RRC is subsequently offered a privately owned unit assisted by project based Section 8, the tenant's refusal does not count against the two offers guaranteed under the RRC.	The proposed policy will not delay or eliminate the rights of tenants under the RRC.  Residents who were lease compliant on 10/1/99 and have not satisfied their right of return will continue to have the option of a new or rehabilitated public housing unit or a Housing Choice Voucher. Residents may have an opportunity to elect a project-based voucher unit, but refusal of a project-based voucher unit will not affect their rights as tenants or their two offers guaranteed under the RRC.
Robert Whitfield, on behalf of the Central Advisory Council	The CAC is supportive of CHA's proposed Property Investment Initiative. The concept of purchasing large foreclosed homes to accommodate large CHA public housing families should be pursued.  The CHA should also consider the projected utility needs of the larger properties, and whether these large homes will require some special assistance to families to address the utility needs.	The CHA updates its utility allowance schedule on an annual basis to reflect changes to its housing portfolio and the cost of utilities. The CHA will consider your comment in determining utility allowances for these properties.
Robert Whitfield, on behalf of the Central Advisory Council	The CAC is concerned about the proposed changes to the Work Requirement policy. The current FY2007 ACOP in Section XIII lists seven exemptions from the CHA Work Requirement. The proposed amendment eliminates the exemption regarding a primary caretaker of a child(ren) under the age of 13 in a household where there are two or more adults and at least one adult is working. The CAC believes this exemption is needed by low-income families with school age children, given that these families may be less able to pay for child care. It is unclear why the CHA is eliminating this exemption. The CHA should retain this exemption.	The overarching goal of the CHA Work Requirement is to promote self-sufficiency. As a result, the CHA requires all adults between the ages of 18 - 61 to comply with the CHA Work Requirement.  In response to the concern regarding child care, a resident will be eligible to apply for Safe Harbor if he/she attempted but failed to find adequate child care to allow the residents and/or adult authorized member to work.

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Robert Whitfield, on behalf of the Central Advisory Council	<p>In the initial Attachment D of the Amended and Restated MTW Agreement (MTW Agreement) sent by the U.S. Department of Housing and Urban Development (HUD) to the CHA and in the draft published for public comment, provision 11 of Attachment D stated "The CHA shall maintain and honor the lease amendment provisions negotiated with the Central Advisory Council related to relocation rights, rights to return and other resident rights applicable to residents subject to displacement due to activities associated with the Plan for Transformation." Provision 11 of Attachment D of the executed MTW Agreement is different from the original text and no longer includes the CAC's name. The CAC was not aware of the revisions to provision 11 until after it received the final document signed by the CHA in June 2008. The CAC is recognized by HUD and the CHA as a jurisdiction-wide resident council.</p> <p>Further, the CAC is signatory to the RRC, which is extended and remains in effect pursuant to specific provisions of the MTW Agreement. The CAC is not aware of any correspondence from HUD or any provision in the MTW Agreement that precludes or lessens the CAC's representation of families under the RRC during the Plan for Transformation. The elimination of the CAC's name is puzzling, and should not have been done without prior notice or explanation to the CAC. The CAC requests that the CHA amend provision 11 of Attachment D to include the CAC's name.</p>	<p>Provision 11 of Attachment D of the executed MTW Agreement states that: "The CHA shall maintain and honor provisions of the Relocation Rights Contract, as negotiated and modified from time to time with duly authorized representatives of CHA residents, related to relocation rights, rights to return, and other resident rights applicable to residents subject to displacement due to activities associated with the Plan for transformation." The term "duly authorized representatives" includes the Central Advisory Council, the Ombudsman, as well as any future authorized resident representation.</p>
Jessie Campbell	<p>I live in Bridgeport Homes and I wanted to know if I was able to transfer from here to a different housing in Ford County or Iroquois County. Please get back to me as soon as possible.</p>	<p>The CHA Asset Management Department directly followed up with Jessie Campbell. For further questions, please contact Kevin Collins, Asset Manager for Bridgeport Homes, at (312) 913-7172.</p>
Charlene Peden	<p>I put in a request to move to another building, but because I am disabled, and recently injured myself, I can not move when I had originally expected to move. I need to stay in my apartment longer.</p> <p>Also, during the time that I have lived in this building, the apartment was not regularly heated, nor were repairs done. My car was towed illegally and without notification.</p>	<p>The CHA HCV Department directly followed up with Ms. Peden and addressed her concerns. For further questions, please contact the HCV Call Center at (312) 935-2600.</p>
Ethel Bowen	<p>I've been on Section 8 for 18 years. What do I need to do? I feel like I need to do something. I haven't gotten a letter about going downtown. Is my rent going up?</p>	<p>The CHA HCV Department directly followed up with Ms. Bowen and addressed her concerns. For further questions, please contact the HCV Call Center at (312) 935-2600.</p>

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Craig Veite	I am a senior program analyst at the San Diego Housing Commission, and we are becoming a Moving to Work agency. I have a couple of questions about your HCV re-examination policy. Can someone please call me to discuss this?	Your contact information has been forwarded to the CHA HCV Department. Someone will contact you to discuss your questions.
Steve Bogira	Can I get a print copy of the most recent Plan for Transformation?	The CHA mailed a copy of the FY2009 MTW Annual Plan - Plan for Transformation Year 10 to Mr. Bogira. You can also print a copy from the CHA's website.
Kira Bell	I applied for a voucher in October 2007. My application was accepted, and I had an interview with an intake specialist. I was asked to bring in the required documents to be copied. After I submitted my information, CHAC sent me a letter of denial. I still have the receipt stating that I was accepted into the HCV Program. Can someone please tell me why I haven't received a voucher? Or, can you tell me how to obtain a voucher? I'd like information about the different types of subsidy I might qualify for. I am disabled.	Your contact information has been forwarded to the CHA HCV Department. Someone will contact you to discuss your concerns. Please feel free to contact the HCV Call Center at (312) 935-2600.

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