

RENTAL ASSISTANCE PROGRAM STATISTICS

ACTIVITY	12/2010	1/2011	2/2011	3/2011
Applications	51	39	39	51
Walk-in/Appointments	176	157	164	187

WAIT LIST	11/2010	12/2010	1/2011	2/2011	3/2011
Section 8 Vouchers (498)*	1,038/929	1,078/963	1,070/955	1,033/936	1,092/987
Parkview Knoll (28)	82	85	87	88	87
Blue Mountain Estates (28)	50	50	52	50	50
Scattered Sites (24)	85	79	80	78	75
Schoolhouse Manor (32)	35	38	37	38	42
Monterey House (24)	13	14	15	15	15
Francis Murphy Apartments (120)	72	68	66	60	63
Springfield Manor (36)	75	76	78	79	82

* Where two numbers are shown, the first is total applications and the second is persons free of debts or criminal records that would bar them from participation.

Vouchers	12/2010	1/2011	2/2011	3/2011	4/2011	YTD Proj
Available	498	482	482	482	482	1,928
Utilized	495	492	491	486	484	1,953
Occupancy	99.40%	102.07%	101.87%	100.83%	100.41%	101.30%

PUBLIC HOUSING	1/2011	2/2011	3/2011	Vacancy	Occupancy	Move in	Move Out
PVK	28	28	28	0	100%	0	0
BME	28	28	26	2	93%	0	2
Scattered	22*	22*	22	2	91%	0	3

* On 10/1/2010 one unit was taken off-line for capital program repairs.

RENTAL PARTNERSHIP	1/2011	2/2011	3/2011	Vacancy	Occupancy	Move In	Move Out
SHM	32	32	32	0	100%	0	0
Monterey	24	24	24	0	100%	0	0
Francis Murphy	119	119	120	0	100%	1	0
Springfield Manor	36	36	36	0	100%	0	0

I. Reports

- A. Conversion - Everything has been approved, we understand, subject to the review by the Baltimore Fair Housing and Equal Opportunity staff. Staff are beginning the planning process on this end and we have engaged our software vendor in the discussion.
- B. Funding - Mr. O'Brien placed comments regarding the income reductions we expect resulting from the recently approved federal budget for the current federal fiscal year (October 1, 2010 to September 30, 2011). A reduction of \$47,000 in an annual budget that was \$344,000. Another way to look at it is to term it two-months of income. This overall reduction of 14% in total income is a 21% cut in the dollars we pay in salaries - typically the only place an organization can make significant cuts - this is not a cut in the monies we are given to pay landlords - it is strictly administrative. The Balance Sheet Mr. O'Brien has prepared shows that our cash reserves in Section 8 total \$63,000. If further cuts are made in the 2011 federal budget, we will have to think long and hard about how we do the rental assistance business.
- C. Sink hole - Speaking of places that absorb money, a third sink hole has developed in the storm water management area at Francis Murphy. Over 30 years of concrete were used to plug the first two. We will be employing a geotechnical company to do subsurface electronic mapping before the third repair is begun in order to address weaknesses that have not yet emerged.
- D. Rent-to-Own - We rented an RTO house this week! To date, now 4 houses are rented and 2 are finished with the rehab stage and are available for rent with HAWC signs in the yard or window. The two vacant units are being listed weekly on Craig's List. Mrs. Schnebly will start addressing the Homeownership counseling sessions at the Hagerstown Home Store in the near future to promote the RTO concept.
- E. Welcome packets - The welcome packet design approved at the last Marketing Committee meeting will, we hope, be ready for distribution and a first review at the upcoming board meeting.
- F. Board vacancy - On March 7, 2011, we obtained the County's most current list of individuals interested in serving on HAWC's Board of Commissioners. On March 17, we mailed our screening questionnaire to the four individuals. By the April 1 deadline, we received two completed questionnaires. (The individual that emailed several of our commissioners did not submit questionnaire answers.) One of the two showed a particular interest in issues affecting the Hagerstown City. By phone, the candidate confirmed that her interest was in serving on the Hagerstown Housing Authority board, so, with that person's permission, her application was forwarded to Mr. Shankle.

The one remaining questionnaire returned has been posted on the staff only portion of our new web site for your review along with this candidate's BOCC Volunteer Form results.

G. Managing the Section 8 Program - In previous discussions we have reviewed the various rules which make it tough to run a Section 8 program within the funding allotted by Congress. We have currently reduced our "target" leasing figure by 16 units because the funding we get will not cover our full 498 unit capacity at today's rental assistance cost. However it is worth spending some additional discussion time with the steps outlined in the new chapter of the Administrative Plan being adopted at this meeting. Chapter 29 is short and sweet. The possible action steps read as follows:

1. The Housing Choice Voucher Payment Standards may be reviewed in light of the funding situation. If payment standards are reduced, the lower payment standard shall go into effect immediately for new admissions, participants moving from one unit to another, and people staying in place who require a new HAP contract because they are signing a new lease. In extraordinary circumstances, the Housing Authority of Washington County Housing Authority may be forced to ask HUD for a waiver so that even those participants staying in place without a new lease shall have their payment standard decreased immediately instead of the normal second regular reexamination after the lowering of the payment standard.
2. Since Housing Authorities do not have to wait until the HAP contract anniversary date to review owner rents and reduce them if warranted, the Housing Authority of Washington County Housing Authority will ensure that owner rents do not exceed amounts charged for unassisted units in the same building or complex. The initial rent and all rent increases must comply with any State or local rent control limits. Further, any owner leasing promotions for unassisted tenants (e.g., the initial two months of occupancy are "rent free") must be taken into consideration in determining rent reasonableness.

In accordance with the HAP contract, the Housing Authority of Washington County Housing Authority will provide written notice to owners before reducing unreasonable rents. Rents may be reduced as early as the first of the following month. If the rent to owner is not reasonable as most recently determined by the Housing Authority of Washington County Housing Authority, the owner must reduce the rent to the reasonable amount or the HAP contract must be terminated. In such cases, the family will be issued a HCV to find a new unit. (Movers, like new participants, are subject to the Housing Authority of Washington County Housing Authority's current payment and occupancy standards.)

3. Housing Choice Voucher Payment Standards must be established according to HUD regulation so that no more than 40% of the participants are paying more than 30% of their monthly adjusted income for rent. If circumstances dictate it, the Housing Authority of Washington County Housing Authority may be forced to ask for a waiver of this prohibition in order to sufficiently lower its payment standard.
4. The utility allowance schedule may be reviewed to determine if the utility allowances are too high. If they are too high that means that the participants are being subsidized in an excess manner. The new utility allowance schedule may be placed into effect after a thirty day notice or at a participant's next reexamination depending on the financial circumstances the Housing Authority of Washington County Housing Authority finds itself in.
5. An initial PHA may request that a receiving PHA absorb portable families for which the initial PHA is being billed. This may include the receiving PHA retroactively absorbing families for which the initial PHA was already billed and made payments. In these cases, the receiving PHA reimburses the initial PHA for payments made back to the effective date of the absorption. Both the receiving PHA and initial PHAs must agree to this arrangement. This provision provides an exception to section 10 of Notice PIH 2008-43 on HCV Portability and Corrective Actions. (Section 10 provides that the receiving PHA may not retroactively absorb families for which the receiving PHA was previously billing for any time period that commences before 10 working days from the time the receiving PHA notifies the initial PHA of the absorption.) The Housing Authority of Washington County Housing Authority will attempt to get receiving PHAs to absorb whenever possible.
6. As stated in Section 11.6, utility allowances are supposed to be adjusted annually or sooner if there is a utility rate increase of 10% or more. If circumstances warrant, the Housing Authority of Washington County Housing Authority reserves the right to seek a HUD waiver of this regulatory requirement.
7. If financial circumstances dictate, the Housing Authority of Washington County Housing Authority may deny discretionary portability moves to a higher cost area inside or outside its jurisdiction for its Housing Choice Voucher participants and/or shoppers if the Housing Authority of Washington County Housing Authority has insufficient funds to pay the higher subsidy amounts and the receiving housing authority declines to absorb the family. While the Board of Commissioners must establish this policy after an examination of the fiscal affairs of the organization, individual denials of portability shall only occur after the Housing Authority of Washington County Housing Authority has determined that the

receiving housing authority will not absorb the family. The denial of absorption shall be documented in that person's file.

This can only occur if the portability action would cause the Housing Authority of Washington County Housing Authority to be unable to avoid terminating the vouchers of current voucher participants during the affected calendar year. If a family is denied its portability request, no subsequent families will be admitted to the program until the Housing Authority of Washington County Housing Authority has determined that sufficient funding exists to approve the move and has notified the family that the family may now exercise its move to the higher cost area.

8. If financial circumstances dictate, the Housing Authority of Washington County Housing Authority may deny the right of a participant to move within the jurisdiction of the Housing Authority of Washington County Housing Authority to a portion of the jurisdiction that has a higher payment standard than the portion of the jurisdiction the participant currently lives in if the Housing Authority of Washington County Housing Authority has insufficient funds to pay the higher subsidy amounts. *{The determination of insufficient funds includes the Section 8 reserves. In other words, the Authority has to be flat broke before a participant's right to move would be revoked.}*
9. Housing Choice Vouchers issued to families on the waiting list that have not resulted in HAP contracts may be cancelled.
10. The Housing Authority of Washington County Housing Authority may be forced to not reissue vouchers surrendered by current participants immediately upon their return to the Housing Authority. Instead, the vouchers may be held in the Authority's inventory in order to avoid dire financial consequences. The amount of time they will be held shall be determined based upon the financial situation of the Housing Authority.
11. The subsidy standards set forth in Section 6.0 may be reexamined. The size of the unit the Housing Choice Voucher is issued for may need to be reduced. For example, HAWC may use the zero bedroom payment standard for households with only one person.
12. A program wide study may be conducted to ensure that families are utilizing the proper size Housing Choice Voucher for their current family size.
13. If the minimum rent is increased under Section 11.5 (B), it can be made the first of the month following the month families are notified of the increase (provided there has been at least a 30-day notice) instead of at the next reexamination.

14. The requirement of when families have to report changes of their income as set forth in Section 14.2 may be modified due to the financial pressure facing the Housing Authority of Washington County Housing Authority. Also, the new rent payment may become effective at the start of the next month provided there has been a thirty day notice.
15. Owners participating in the Housing Choice Voucher Program may be asked to voluntarily reduce the rents they are charging participants in order to assist in the financial solvency of the program. This must be a truly voluntary program.
16. The absolutely last step the Housing Authority of Washington County Housing Authority will take to resolve its Housing Choice Voucher financial problems will be to terminate the vouchers of families already receiving assistance after notifying the HUD Field Office and its Financial Analyst at the Financial Management Center. If this becomes necessary, HAWC shall use a random lottery to determine which individual Housing Choice Vouchers are terminated first.
17. If it becomes necessary for the Housing Authority of Washington County Housing Authority to terminate Housing Choice Vouchers, the families terminated shall be reinstated onto the program as soon as fiscally and practically feasible. The readmission sequence shall be the same order in which families were originally dropped.

H. Positive Communication - Please add your own suggestions for positive words so we can continue to update our table at the meeting.

PC (POSITIVE COMMUNICATION)	LANGUAGE TO AVOID (FORMERLY THE NO-NO WORDS AND PHRASES)
Community	Development
Community	Project
Homes	Houses
Homes	Housing
Seniors	Elderly
Families	Households
Homes within reach of working families	Affordable housing
? Opportunity target ?	Income limits/guidelines

PC (POSITIVE COMMUNICATION)	LANGUAGE TO AVOID (FORMERLY THE NO-NO WORDS AND PHRASES)
Persons with disabilities	Disabled persons
Mr./Mrs./Ms. Last name or Mam/Sir	"Hon" or "Honey" or "Dear"
(when someone is reporting that something needs to be repaired..) Did you call Mrs. Shipley?	Did you call Maintenance?
Fully Accessible	Handicap

II. Action items

- A. Section 8 Administrative Plan - As part of the process of revising our electronic filing system, updating our policy documents and double checking the files we will post to the staff and commissioner private area of our web site, we found two chapters missing from our Administrative Plan. The "Admin Plan," as we term it, is the policy document for administration of the Section 8 rental assistance program. Staff recommend adoption of Resolution 2011-7 as follows:

***WHEREAS** the Housing Authority presently uses an update service for its Public Housing Admissions and Occupancy Policy and its Section 8 Administrative plan that is produced by the Schiff Group, formerly a subcontractor of the National Association of Housing and Redevelopment Organizations (NAHRO); and*

***WHEREAS** the Schiff Group has provided the Authority with suggested policy language;*

***NOW THEREFORE BE IT RESOLVED** that the Administrative Plan be updated by staff as recommended by the Schiff Group Agency Plan Updating Service to incorporate the additions of Section 28.0, "Housing Conversion Actions", and Section 29.0, "Cost Saving Possibilities".*

The conversion actions covered in the new chapter 28 deal with our steps when a private landlord that has project-based Section 8 units chooses to "opt" out of their agreement, giving up the assisted units usually because they have determined that they can pay off the HUD portion of their mortgage if they make all of their rentals "private market." This type of action has not impacted properties in our market. Youngstoun opted out of their contract over 10 years ago. The assisted units get added to our HUD contract.

- B. Section 8 Hearings - Staff recommend addition of language to the Section 8 Administrative Plan to clarify the complaint process. Resolution 2011-8 reads as follows:

***WHEREAS** the Housing Authority intends that all disputes be handled at the lowest practical level within the organization; and*

WHEREAS the policy language describing hearings in the Section 8 Administrative Plan does not clearly present this important strategy;

NOW THEREFORE BE IT RESOLVED that the Administrative Plan chapter be amended to include the following language:

It is the policy of the Housing Authority of Washington County to avoid disagreements, and where disagreements do arise, to settle them with as little formality as possible. ...

The Housing Authority of Washington County will investigate and respond to complaints by participant families, owners, and the general public. The Housing Authority of Washington County requires that complaints other than those involving HQS violations be put in writing. Anonymous complaints are investigated only when corroborating information is readily available. Other arrangements for submission of complaints or requests for hearings, such as personal interviews or tape recording, will be made available for the visually impaired or those with motor impairments.

It is easier to resolve a complaint when it is received promptly. Complaints should be brought to the attention of HAWC staff within ten (10) calendar days of the Authority's action or failure to act. The person responsible for the decision or action will contact the person making the complaint to arrange a mutually convenient time to seek an informal resolution of the complaint.

HAWC staff will provide a written summary of the issues raised at the informal meeting as well as the proposed disposition of the complaint and the specific reasons for the Authority position, as appropriate. The summary will provide the procedures for requesting a formal hearing as described below if the complainant is not satisfied. The informal summary will be mailed to the complainant by certified mail and appropriately filed.

- C. Medical Marijuana - In the immediate past session of the Maryland Legislature, a medically prescribed use of marijuana is now recognized as a defense against charges of marijuana possession. This action creates a conflict with federal law that housing authorities must deal with. Because HUD has ruled that federal law preempts state law on this issue we are left with a situation where new admissions of medical marijuana users is prohibited, but the Authority may exempt marijuana use by "existing" tenants or participants from the ban on illegal drug use. Because making policy consistent with local values is a HAWC guiding principle, staff considered how our local delegation voted on this matter in considering how best to recommend policy on this issue. We found that half of the Washington County delegation voted for the measure and half voted against it. House Bill 291 passed 106-28 and the companion bill, Senate Bill 308, passed 41-6. Accordingly staff believe the appropriate policy choice is to follow federal guidance by not admitting persons who use medical marijuana (absent an arrest record, this is not something we would know), and to follow state law on the matter of whether to terminate assistance for a marijuana-related drug arrest, providing that the court voids the arrest. As an aside, because the rental assistance is federally

funded and the federal government does not recognize marijuana as a legal medication, participants will not be able to claim marijuana-related expenses as medical deductions in their rent calculations. Staff recommend adoption of resolution 2011-9 as follows:

WHEREAS with the passage of House Bill 291 and Senate Bill 308 the State of Maryland has legalized the use of marijuana when medically prescribed; and

WHEREAS the Schiff Group has provided policy language for the consideration of states that allow medical marijuana use;

NOW THEREFORE BE IT RESOLVED that the Administrative Plan and the Admissions and Occupancy Policy documents be amended to remove medical marijuana from the ban on illegal drug use as provided in the March, 4, 2011 Schiff Group update when and if this legislation is signed into law by Maryland's Governor.

- D. Portability - In accordance with HUD Notices 2011-3, issued January 19, 2011, HUD is clarifying a number of provisions surrounding the portability aspect of the Section 8 Voucher program. Most notably in these days of reduced funding, HUD is clarifying the importance of portability as a tool to affirmatively further fair housing. Portability removes geographic barriers to following a job or to escape from a racially or economically segregated neighborhood. In practical terms, portability means that a housing agency must have used every penny of its reserves before it can deny a family's request to "port." (In this instance the changes being recommended by the Schiff Group for our Administrative Plan are more of a handbook and reference guide for staff than a policy expression.) Accordingly staff recommend adoption of resolution 2011-10 as follows:

WHEREAS the Housing Authority presently uses an update service for its Public Housing Admissions and Occupancy Policy and its Section 8 Administrative plan that is produced by the Schiff Group, formerly a subcontractor of the National Association of Housing and Redevelopment Organizations (NAHRO); and

WHEREAS the Schiff Group has provided the Authority with suggested policy language;

NOW THEREFORE BE IT RESOLVED that the Administrative Plan and the Admissions and Occupancy policies be changed by staff as recommended by the Schiff Group Agency Plan Updating Service to incorporate new HUD regulations published in Public and Indian Housing Notice 2011-3 relating to "Housing Choice Voucher Family Moves with Continued Assistance".

- E. Rent to Owners - Just like the prohibition on individuals receiving two rental subsidies, no rental community should receive a double subsidy either. HUD's notice 2011-1 issued on January 12, 2011, made this principle specific for "236" projects, those funded by sections 221(d)(3), 201 or 811 and Rural Development 515 communities. Monterey House has 515 funding and one unit that is non-subsidized. If a tenant with Section 8 assistance someday applies for this one Monterey unit, we may not charge more than the base rent we have set for other residents. This

understanding was placed into policy language for us by the Schiff Group, and accordingly staff recommend adoption of resolution 2011-11 as follows:

WHEREAS the Housing Authority presently uses an update service for its Public Housing Admissions and Occupancy Policy and its Section 8 Administrative plan that is produced by the Schiff Group, formerly a subcontractor of the National Association of Housing and Redevelopment Organizations (NAHRO); and

WHEREAS the Schiff Group has provided the Authority with suggested policy language;

NOW THEREFORE BE IT RESOLVED that the Administrative Plan and the Admissions and Occupancy policies be changed by staff as recommended by the Schiff Group Agency Plan Updating Service to incorporate new HUD regulations published in Public and Indian Housing Notice 2011-1 relating to "Rent to Owners in Subsidized Projects Under the Housing Choice Voucher Program".

- F. Annual Plan for 2011 - Preparation of the documents to support year two of the 5-Year plan adopted last year have taken 3 hours of staff time (as a footnote to "Why we are seeking Conversion!"). Staff recommend adoption of resolution 2011-12 as follows:

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year and Annual PHA Plan for the PHA fiscal year beginning 7/1/2010, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- 1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.*
- 2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.*
- 3. The PHA certifies that there has been no change, significant or otherwise, to the Capital Fund Program (and Capital Fund Program/Replacement Housing Factor) Annual Statement(s), since submission of its last approved Annual Plan. The Capital Fund Program Annual Statement/Annual Statement/Performance and Evaluation Report must be submitted annually even if there is no change.*
- 4. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA,*

consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.

5. *The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.*

6. *The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.*

7. *The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.*

8. *For PHA Plan that includes a policy for site based waiting lists:*

- *The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2006-24);*

- *The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;*

- *Adoption of site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;*

- *The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing;*

- *The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).*

9. *The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.*

10. *The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.*

11. *The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.*

12. *The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.*
13. *The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).*
14. *The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.*
15. *With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.*
16. *The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.*
17. *The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.*
18. *The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).*
19. *The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.*
20. *All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.*
21. *The PHA provides assurance as part of this certification that:*
 - (i) *The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;*
 - (ii) *The changes were duly approved by the PHA Board of Directors (or similar governing body); and*
 - (iii) *The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.*
22. *The PHA certifies that it is in compliance with all applicable Federal statutory and regulatory requirements.*

G. Flat Rents for Senior Units - In May of 2009 the Authority adopted a schedule of market rents for our scattered site family units that was based on rents in the private market determined by a local property appraisal firm. These comparable rents were provided to us in terms of per square footage factors that we could apply to other properties we might acquire. We placed our scattered properties in a matrix, applied the factors and annually updated the figures with the percentage change in the HUD-determined fair market rents in our market area. The market rents for one-bedroom units were not covered in the appraisal.

In the current market, the Section 8 division has provided us with an analysis of 12 comparable rental units built after 1975, whose average gross rent per square foot is \$1.0103. "Flat rent" is the term used to describe a ceiling or market rent in low-rent public housing units, and the these communities would be used to establish the upper rent limit for a non-subsidized rent. Accordingly staff recommend adoption of resolution 2011-13 as follows:

WHEREAS the rents for one-bedroom apartments in Washington County that were built after 1975 average \$1.0103 per square foot as determined by a survey of unassisted units conducted by the Authority's Section 8 staff; and

WHEREAS the Authority wishes to establish an appropriate market rent level for any unassisted units that are not otherwise regulated by state or federal funding sources;

NOW THEREFORE BE IT RESOLVED that the flat or market rental rates for senior communities be established as set forth in the following table:

Location	Built	BR	SF	Flat Rent
Blue Mountain Estates	1982	1	590	\$595
Parkview Knoll	1984	1	609	\$615
Monterey	2001	1	600	\$605
Francis Murphy - 1	2005	1	606	\$610
Francis Murphy - 2	2005	2	817	\$825
Schoolhouse Manor	2002	1	640	\$645
Springfield Manor	2005	1	700	\$705