

February 17, 2006

Ms. Stephanie Aveiro, Executive Director  
Housing and Community Development Corporation of Hawaii  
677 Queen Street, Suite 300  
Honolulu, Hawaii 96813

Re: PHA 5 Year and Annual Plan  
Recommendations

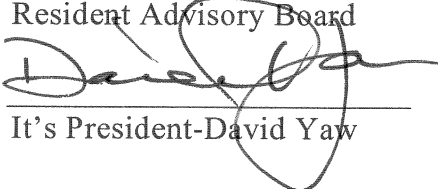
Dear Ms. Aveiro,

The Resident Advisory Board (RAB) would like to submit our recommendations/comments as we have completed our review of the HCDCH Draft PHA 5 Year and Annual Plan 2006 pursuant to 24 CFR Part 903.

Please contact the RAB coordinator to schedule a meeting to receive the agency's responses to our recommendations/comments.

We look forward to meeting with you soon. Thank you very much.

Sincerely,

Resident Advisory Board  
By:   
It's President-David Yaw

Five Year Plan

The RAB reviewed the Five-Year Plan and supports the proposed goals and objectives.

Annual Plan

1. Housing Needs

The RAB reviewed the Housing Needs and has no comment at this time to this section of HCDCH's 2006 annual plan.

2. Financial Resources

- a. The RAB recommends that HCDCH research all available funding from the Dept. of Homeland Security and other financial resources that, in the event of a natural disaster, may be used towards federal public housing. These funds should be allocated for evacuation plans from natural disasters but more importantly, used for preparations before and services after, a natural disaster or act of terrorism occurs, which is currently not being addressed by HCDCH.

3. Policies on Eligibility, Selection and Admissions

- a. The RAB recommends that HCDCH implement policies that will create a balance on the waitlist between the working poor and the homeless in transitional shelters. HCDCH should choose applicants (chronologically) by the month/date/year in the order that they applied to ensure fairness for everyone. HCDCH has given priority to the homeless over those who have been on the waitlist for many years which is not fair for the rest of the applicants on the waitlist.
- b. The RAB recommends that HCDCH consider a site based waitlist and selection process to eliminate delays and avoid applicants from declining a unit and being pushed back to the end of the waitlist.
- c. The RAB recommends that HCDCH allow applicants two choices instead of being limited to one choice. The applicant's choice to decline a unit may be attributed to concerns of personal safety and/or the community's history.

#### 4. Rent Determination Policies

- a. The RAB recommends that HCDCH improve communication with working families on options available should hardship occur in paying their rent. Such options include advance payment, partial payments and/or interim rent adjustment should presented as a solution to help the tenant's situation.

#### 5. Operations and Management Policies

- a. The RAB has recommended and continues to recommend to HCDCH that the billing system reflect two separate charges, one for rent and one for maintenance and repair. The current system takes maintenance fees out first and rent second, leaving residents with unwarranted rent payments. If the rent is deducted before the maintenance fee, this will allow the tenant the option to contest any maintenance charges that occur due to recycled parts, wear and tear, shoddy work and the abuse of labor cost.
- b. The RAB recommends that HCDCH revise the lease agreement into simple language and translated into different languages. HCDCH's response to this recommendation has been that translators are available, however, translators should be used when the resident first moves into public housing not only when the resident is in the process of being evicted. The RAB has repeatedly recommended this to HCDCH.
- c. The RAB recommends that HCDCH improve the monitoring of vacant unit turnaround to ensure that all vacant units are being turnaround in 25 days or less. The RAB also strongly recommends that HCDCH take appropriate actions as needed when this stipulation is not met. This recommendation should have been implemented during the HUD's MOA with HCDCH.

#### 6. Grievance Procedures

- a. The RAB recommends that HCDCH follow the due process as stated in Act 227 in cases being referred for eviction. HCDCH must follow their timelines or be held accountable.
- b. The RAB recommends that the grievance procedures be revised to allow the RAB and HCDCH to decide on the final list of hearings officers. HCDCH's previous response that the selection of hearings officers does not fall within the scope of responsibilities for the RAB is inaccurate. Under HUD's 24 CFR 964, the resident advisory board acts as the State of Hawaii's jurisdiction wide resident association which was voted and recognized by all resident associations in federal public housing.

## 7. Capital Improvement Needs

- a. HCDCH's reasons for cut backs in the renovation of communities due to lack of funding is alarming. Funding has already been allocated for the completion of a project with the contractor's promise to fulfill his obligation to the contract. There should be no shortcuts due to rise in construction costs, inflation or any other reason. Using Mayor Wright Homes as an example, the end result falls short of the original plan and should not look like it does when hundreds of thousands of dollars was already invested in the site. This concern should not reflect on the site manager but rather be reflective of the specific department/branch which hired the contractor.
- b. The RAB recommends that HCDCH keep residents informed on construction updates concerning their project. This will alleviate a lot of questions/anxiety from residents as to why a project was halted or why delays on the project are taking place.

## 8. Demolition and Disposition

The RAB reviewed the Demolition and Disposition and has no comment at this time to this section of HCDCH's 2006 annual plan.

## 9. Designation of Housing

- a. The RAB recommends that as a condition of accepting a unit in public housing, applicants who receive mental health services, shall provide the appropriate assessment certifying that they do not pose a safety risk to their community and are able to live with minimal assistance from outside services. Currently, residents who require substantial mental health services, has jeopardized the safety and security of others living in the project by displaying violent and intimidating behavior.

## 10. Conversion of Public Housing

The RAB reviewed the Conversion of Public Housing and has no comment at this time to this section of HCDCH's 2006 annual plan.

## 11. Homeownership

The RAB reviewed Homeownership and has no comment at this time to this section of HCDCH's 2006 annual plan.

12. Community Service Programs

The RAB reviewed the Community Services Programs and has no comment at this time to this section of HCDCH's 2006 annual plan.

13. Crime and Safety

- a. The RAB strongly recommends that HCDCH budget annually for crime and safety programs such as the community watch program and drug prevention programs since additional funding from HUD has been eliminated (Public Housing Drug Elimination Program). The RAB feels that HCDCH has not appropriated funds specifically for crime and safety activities.
- b. The RAB recommends that HCDCH obtain resident feedback from residents as to how funding should be allocated for crime and safety program services to their particular project since each community has unique needs.
- c. The RAB recommends that HCDCH provide an annual report to the RAB disclosing how crime and safety funds were spent for the previous fiscal year. The report should include how much funding was allocated, how the money was spent and which sites received monies.
- d. The RAB recommends that HCDCH partner with the State Sheriff's Dept. to patrol sites with high crime/violence incident rates. By using the state sheriffs' to patrol the housing sites will reduce crime and violence through enhanced law enforcement presence. Gang violence, racism and crime have increased in public housing with some incidents resulting in fatalities. This has caused residents, especially the elderly, to be intimidated and to live in fear. This recommendation has been made repeatedly with no improvements, and residents are unable to peacefully enjoy their community (per lease agreement and 24 CFR 964). This recommendation is being made to put HCDCH on notice that they can now be held financially liable for physical and emotional damages because of their failure to fulfill their responsibilities.

14. Pet Policy

- a. The RAB recommends that HCDCH revise the pet policy to allow residents living in non high-rises (for example, Kekaha Ha`aheo on Kauai) be allowed to sit outside their front door with their leashed pet. This will allow residents to take advantage of the open areas in their communities.
- b. The RAB recommends that HCDCH enforce the pet policy consistently with ALL residents. HCDCH staff living in public housing are not complying with the size requirements for pets as stated in the policy.

- c. The RAB recommends that HCDCH and the pet owner be held financially responsible for pets (authorized and unauthorized) if they cause harm to a resident. HCDCH is responsible for all their properties and the resident is responsible for the actions of their pet.

15. Civil Rights Certifications (included with PHA Plan Certifications)

The RAB reviewed the Civil Rights Certification and has no comment at this time to this section of HCDCH's 2006 annual plan.

16. Audit

The RAB reviewed the Audit and has no comment at this time to this section of HCDCH's 2006 annual plan.

17. Asset Management

The RAB reviewed the Asset Management and has no comment at this time to this section of HCDCH's 2006 annual plan.

18. Other Information

The RAB reviewed the Other Information and has no comment at this time to this section of HCDCH's 2006 annual plan.

19. Definition of "Substantial Deviation" and "Significant Amendment Or Modification"

The RAB reviewed the definition of substantial deviation and significant amendment or modification and has no comment at this time to this section of HCDCH's 2006 annual plan.

20. Additional Comments

- a. The RAB recommends that HCDCH honor 24 CFR 964, Tenant Opportunities and Participation in Public Housing, which states that all tenants be involved in all aspects of management operations be followed. 24 CFR 964 has not been implemented in its entirety and hasn't given tenants the opportunity to participate in all aspects of management operations, regardless of HCDCH sensitivity on the

subject. 24 CFR 964 must be implemented according to federal regulations handed down by the US Congress.

- b. The RAB recommends that any substantial deviation from the PHA Plan must be communicated to the RAB in a special meeting to discuss any proposed changes to be made by HCDCH or the Board of Directors. Recent changes to the Grievance procedures were made without the proper protocol being followed and without RAB involvement. HCDCH response to the RAB's past recommendation concerning the choosing of hearing officers is inaccurate.