

HCDCH Responses to Resident Advisory Board (RAB) Recommendations
And Public Hearing (March 23, 2006) Comments
On The HCDCH FY 2006 Five-Year and Annual Plan

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.

Response: HCDCH wholeheartedly agrees and HUD updates HCDCH regularly on all types of available funding sources. In addition, HCDCH will also seek out other funding sources that may be used in the event of a natural disaster.

HCDCH is working on an agency-wide plan in the event of a natural disaster.

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.

Response: HCDCH agrees with the RAB that a balance of eligibility, selection, and admissions should exist between the working poor and the homeless families in transitional shelters. While achieving a proper balance between accepting the homeless families and the working poor, HUD has directed all PHAs to comply with the Income Targeting requirements which includes not less than 40 percent of families admitted to a PHA's public housing and section 8 program during the PHA fiscal year from the PHA waiting list shall be extremely low income families. Upon improvement of the current affordable housing crises, HCDCH will look to revise the existing procedures to include a percentage of working poor be admitted into public housing.

- 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.

Response: HCDCH is exploring the possibility of a site based wait list in respect to the change in HUD's Project Based Accounting. HCDCH agrees that a project based site wait list may diminish the waiting period for an applicant once on the wait list. In addition, in light of Project Based Accounting, project management shall be responsible and accountable for attaining 100% occupancy and ensure that fair housing and deconcentration policies are not violated. Moreover, HCDCH shall strive to address the housing needs of the most needy.

- 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.

Response: HCDCH disagrees that applicants should have more than one offer to a choice of the applicant's selection. HCDCH feels that allowing the applicant more than one offer would only increase the wait period for all other applicants. HCDCH feels that the purpose of assisted housing is to allow a family to reside in a community of their choice. With the move to Project Based Accounting, the applicant shall be able to directly apply with the community of their choice. Should a family believe that a particular community poses a threat to personal safety, the applicant should not indicate a willingness to reside there.

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 be presented as a solution to help the tenant's situation.

Response: HCDCH agrees that communication with working families regarding rent is important. HCDCH shall utilize several methods of communication such as the monthly HCDCH newsletter and rent bill to inform residents of the options available should hardship occur in paying their rent. It is important to note that it is the tenant's responsibility to inform their housing management staff of any hardship 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.

Response: HCDCH agrees with this recommendation and is working to purchase new computer software which will allow for two separate billings statements.

- 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.

Response: The lease agreement is a legal document which is very technical and, therefore, it is not practical to have it translated into various languages. Posters, translated in various languages, are posted informing applicants that translation services are available upon request. HCDCH will be sure to make it clear to residents when they first move into housing that translators will be provided at that time, if needed. Also, the application's staff will note in the tenant file when interpreters are needed.

- 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.

Response: HCDCH agrees that vacant units need to be turned around on a timely basis. HCDCH has identified the units that are in major disrepair and is committing additional maintenance staff to prepare these units for occupancy. PMMSB has instituted a weekly tracking of the vacant unit work to assist in monitoring how long it takes between tenant move-out and unit lease-up. HUD has indicated to HCDCH that there has been significant progress under the MOA and , therefore,

has ended the MOA. HCDCH is now working with HUD on an Improvement Plan to address the timely turnaround of vacant units.

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.

Response: HCDCH does follow the due process in Act 227 and pursuant to federal regulations. According to the federal regulations, HCDCH may evict the tenant from the unit by bringing an administrative action of law, after a due process administrative hearing, but must first afford the tenant the opportunity for a hearing under the grievance procedure. The federal regulations define the elements of due process as 1) Adequate notice to the tenant of the grounds for terminating the tenancy and for eviction; 2) Right of the tenant to be represented by counsel; 3) Opportunity for the tenant to refute the evidence presented by the PHA including the right to confront and cross-examine witnesses and to present any affirmative legal or equitable defense which the tenant may have; 4) A decision on the merits. All of which is provided to the tenant. A backlog of cases occurred during the implementation period of the new rules and HCDCH continuously works with management staff to follow the requisite timelines.

- 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.

Response: 24 CFR 966.55 (a) provides in relevant part that the PHA shall consult the resident organizations before PHA appointment of each hearing officer or panel member. Any comments or recommendations submitted by the tenant organizations shall be considered by the PHA before the appointment. There is nothing in the federal regulations that allow the RAB to appoint.

Furthermore, 24 CFR 964.13 states that the role of the Resident Advisory Board is to assist and make recommendations regarding the development of the PHA Plan, and any significant amendment or modification to the PHA plan. HCDCH does not recognize a jurisdiction wide resident council but has developed a working partnership with the resident councils whose role is to improve the quality of life and resident satisfaction to create a positive living environment for families living in 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.

Response: HCDCH agrees that the rapidly rising construction costs are alarming, as HUD funding and HUD's spending limitations has not increased. Funding that has been budgeted for the design and construction cannot be increased to meet the rising construction costs, and will result in less work to be accomplished with the same amount of money. When a contractor signs a contract, no changes in the design of the project are anticipated, and no cut-backs will be made.

In the case of phased construction, the design of the project is dependent on the level of funding for the current design phase and the costs of construction at that time, and the HUD limitations for spending. The design of the current phase will be adjusted to allow the work to proceed within the constraints of funding, cost, and HUD spending limitations.

Supplemental funding has been requested from the State's CIP to keep as much of the original design as possible.

Mayor Wright Homes has not had a renovation done since the early 1980's and the last major work was the repair of the solar panels and roofs in 1999. There was no "original" plan for modernization at the site, although there was a "HOPE VI" program application made in 2001 for the site that was not approved by HUD

- 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.

Response: HCDCH is providing and shall continue to provide updates and information on construction projects in the HCDCH monthly newsletter.

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.

Response: The Fair Housing Act prohibits discrimination on the basis of disability in all types of housing transactions. The Act defines persons with a disability to mean those individuals with mental or physical impairments that substantially limit one or more major life activities. The act also protects persons who have a record of such impairment, or are regarded as having such impairment. To that end, HCDCH does not ask any questions about the nature or extent of any disability or requires that residents seek assistance.

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.

Response: HCDCH agrees that it is important to continue to fund crime and drug prevention programs and will continue to allocate funds, as available. Currently, HCDCH is focusing on the maintenance and repair of the physical units in order to provide homes for families.

HCDCH shall continue to partner with other organizations to provide drug prevention programs, collaborate with the U.S. Department of Justice's Weed & Seed communities, and participate in the Attorney General's Community Action Seminar.

- 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.

Response: HCDCH agrees and will continue to work with the resident associations on obtaining community input.

- 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.

Response: HCDCH prepares an annual report on a yearly basis on the agency's financial activity. Information on crime and safety from the annual report can be provided to the RAB.

- 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.

Response: HCDCH has consulted with the State Sheriff's Department about the possibility of patrolling HCDCH properties. The Sheriff's Department responded that they do not have the manpower to take on this added duty.

HCDCH is concerned about resident safety and will continue to work with police and other law enforcement agencies, as well as with residents, to reduce crime and violence at public housing sites. HCDCH shall continue to provide support in the form of training for residents who participate in a voluntary resident patrol.

HCDCH alone cannot prevent and/or reduce crime without the assistance and active involvement from the community and the residents. HCDCH, to the fullest extent possibly, is providing and will continue to provide safe communities for public housing residents.

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.

Response: HCDCH will consider this revision to the pet policy.

- b. The RAB recommends that HCDCH enforce the pet policy consistently with ALL residents. HCDCH staff living in public housing is not complying with the size requirements for pets as stated in the policy.

Response: HCDCH agrees that the pet policy should be enforced consistently. Housing managers are instructed to review the pet policy with all of their staff to be sure that those living in

public housing are in compliance. HCDCH makes no distinction between live-in staff and residents. Housing managers are encouraged to work closely or create a Pet Committee.

- 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.

Response: HCDCH believes that pet owners be held financially responsible if their pets cause harm.

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.

Response: HCDCH agrees and is moving towards involving residents in all aspects of management operations. HCDCH has assisted in the establishment of resident councils, involved residents to participate on the Evictions Board and become a Grievance Hearings Officer, and works with various Pet Committees. HCDCH considers the involvement of involving residents in all aspects of management operations as a process that takes time to develop.

- 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.

Response: HCDCH is aware that any substantial deviation from the PHA plan must be discussed with the RAB. A Substantial Change is defined as the following: Substantial Change in a goal(s) identified in the Five-Year Plan. For example, checking or unchecking a PHA goal box.

A Significant Amendment/Modification is defined as the following: Significant modifications to major strategies to address housing needs and to major policies (e.g., policies governing eligibility, selection or admissions and rent determination) or programs (e.g., demolition or disposition, designation, homeownership programs or conversion activities).

The HCDCH's Grievance Procedures were discussed with the RAB during the development of the 2005 PHA Plan. In addition, a public hearing was held just for the Administrative Rules change. There are no changes to the procedures in the 2006 PHA plan. The Grievance Procedures were approved by the Governor on July 25, 2005 after the approval by HUD of the 2005 PHA Plan. Any change to the Grievance Procedures does not fit the Substantial Deviation or Significant Amendment/Modification definitions.

HCDCH's response to the selection of grievance hearings officers is again, stated in Grievance Procedures section 6.b. (see above).

Comments from the Public Hearings (March 23, 2006)

Five Year Plan

1. The Five Year Plan indicates that HCDCH intends to "Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status and disability. One such affirmative measure that HCDCH should take is to amend the Admissions Policy to include protection against sexual orientation discrimination. In updating the Admissions Policy, HCDCH will be making the rights of applicants to equal access in housing and the obligations of HCDCH officers of providing such access explicit and clear to applicants and agency officers alike.

Response: The policy on eligibility, selection and admission is not based on any protected basis covered by any civil rights law. Therefore, inclusion of persons identified as homosexual is not necessary since the policy does not deny their eligibility, selection or admission to any public housing program.

Annual Plan

1. Housing Needs

- a. For the charts listed in this section, HCDCH lists only statewide figures. HCDCH should also include a breakdown of figures by each island.

Response: HCDCH is a State entity and its jurisdiction covers the State of Hawaii. HCDCH's intent is to provide services to the community of the State of Hawaii as a whole rather to a specific county. Therefore, information regarding county information would not been seen in the PHA Plan.

2. Financial Resources

HCDCH should apply for Hope VI funding.

Response: The Department of Housing and Urban Development terminated any funding for the HOPE VI Revitalization grant program.

3. Polices on Eligibility, Selection and Admissions

The admissions policy should be amended to include sexual orientation because nearly 34% of homosexuals nationwide have been denied housing due to sexual orientation according to a 2001 nationwide survey commissioned by the Kaiser Family Foundation. Including sexual orientation will further the overall policy goal of creating a "living environment free of discrimination."

Response: The policy on eligibility, selection and admission is not based on any protected basis covered by any civil rights law. Therefore, inclusion of persons identified as homosexual is not necessary since the policy does not deny their eligibility, selection or admission to any public housing program.

- b. HCDCH should create a separate wait list for disabled persons directed towards accessible units and make public an inventory of all accessible of units at each project.

Response: A separate wait list is not necessary since families eligible for accessible units are coded and easily identified when accessible units become available for placements. An inventory of accessible units at each project can be compiled and posted and readily available should a request be made.

- c. HCDCH should allow applicants who meet two or more admissions preference categories should have priority over an applicant with meets just one admissions preference.

Response: A needy family is a needy family regardless of the amount of preferences that the family declares. By allowing a grouping of preferences, HCDCH has maximized and utilized the wait list to fulfill its goals.

- d. Although the Section 8 waitlist, which is currently closed, will be reopened, HCDCH may be giving new applicants “false hopes” since length of time between applying and placement is 72 months.

Response: The PHA Plan does not refer to a wait list being closed for 72 months. The PHA Plan is referencing that if the wait list opens, it will open for a brief period of time. That period of time will be determined by the amount of person applying for this program. It should also be noted that the list will open again, for a brief period of time, if insufficient applicants are placed on the wait list.

- e. The plan states that the Section 8 tenant-based waitlist will be opened in FY 2006 for a brief period of time to obtain more eligible applicants. I would like to suggest that the plan include parameters for when the waitlist will be opened, or for how long or to how many people.

Response: The PHA Plan is referencing that if the wait list opens, it will open for a brief period of time. That period of time will be determined by the amount of person applying for this program. It should also be noted that the list will open again, for a brief period of time, if insufficient applicants are placed on the wait list.

- f. The plan states that the Section 8 tenant-based waitlist will be opened in FY 2006 for a brief/ period of time to obtain more eligible applicants. The plan contains a proposal to continue notifying eligible applicants through published notices, State Department, City and County programs and the U.S. Small Business Administration. I think traditional means of notifying the public may not be adequate.

Response: HCDCH will seek all available media to expose the opening of the waitlist.

4. Rent Determination Policies

No public hearing comments were received on the Rent Determination Policies.

5. Operations and Management Policies

No public hearing comments were received on the Operations and Management Policies.

6. Grievance Procedures

No public hearing comments were received on the Grievance Procedures.

7. Capital Improvement Needs

- a. In regards to the maintenance of the units, HCDCH should allocate funding for fumigation to control rodents or termites for the residents of Makani Kai Hale.

Response: HCDCH is aware of the termite and rodent problems and is addressing the problem now. State Vector Control has been contacted for the rodent control. Rodents are living in burrows in the ground, attracted by food and other litter. State Vector control has instructed the HCDCH to have the residents clean the grounds of food scattered on the grounds and other litter thrown around, and to instruct the residents to keep the area clean. Termite infestation will be addressed by spot treatment within the next year.

- b. In regards to the physical condition of Makani Kai Hale, many units have holes in their ceilings where water leaks through. We are all concerned about the health and safety of our families.

Response: HCDCH is aware of the physical condition of the units at Makani Kai Hale. Preparations are being made to address the roofs and damaged units.

8. Demolition and Disposition

No public hearing comments were received on the Demolition and Disposition.

9. Designation of Housing

- a. HCDCH should apply for approval to designate projects for occupancy only by the elderly or only by person with disabilities.

Response: HCDCH agrees with the designated of project(s) or portions of project(s) as elderly but must first receive HUD approval on an allocation plan. The plan requires certain criteria to be met including but not limited to statistics and/or studies that must be compiled. HCDCH currently does not have the resources to take on a project of this magnitude but will give it serious consideration in the future. As for the designation of project(s) for persons with disabilities, HCDCH does not agree with this recommendation since it is in conflict with the State's efforts to integrate individuals with disabilities into the community based on the Supreme Court's decision in the Olmstead case. Individuals with disabilities are eligible for either family or elderly project as long as they meet the eligibility criteria.

10. Conversion of Public Housing

No public hearing comments were received on the Conversion of Public Housing section.

11. Homeownership

No public hearing comments were received on the Homeownership section.

12. Community Service Programs

- a. One of the ineligible activities to satisfy the Community Service requirement is "Part or fulltime employment." If someone is already employed, why require them to dedicate a minimum of eight weekly hours to participate in 'job-hunting' type activities? I recommend that "employment" be removed from the list of ineligible activities and that employed residents be exempt from this undue burden.

Response: HCDCH requires every adult resident of federal public housing complexes to perform 8 hours of community service, or participate in a self-sufficiency program for at least 8 hours every month or a combination of each activity for a total of 8 hours each month as a condition of tenancy. However, an exemption of this requirement is granted if a resident falls into an eligible

category. One such exemption is if a resident is engaged in work activities at least 30 hours per week as defined in section 407(d) of the Social Security Act (42 U.S.C. 607(d)).

13. Crime and Safety

No public hearing comments were received on the Crime and Safety section.

14. Pet Policy

- a. I would like to send support to the Resident Advisory Board's (RAB) recommendation that HCDCH revise the pet policy to allow residents living in non high-rises (like Kekaha Ha`aheo on Kauai) be allowed to sit outside their front door with their leashed pet. I agree that this is not asking very much and that the board take the request under consideration.

Response: HCDCH doesn't feel that the policy needs to be changed to allow this activity. The current Pet Policy allows areas on the project grounds to be designated for pet exercise. Pet owners must communicate their desires to their project's pet committee or project manager. Mutually agreed upon areas for exercise (or sitting w/their pet) can be designated for the pet owners, whether it be right outside their front door, back door or in an open space area.

- b. The current Pet Ownership Policy allows for "one four-legged furry, warm bodied pet per household. Animals need companionship no less than humans do, and a categorical prohibition on multiple cats or dogs relegates many pets to what amounts to solitary confinement for the vast majority of the time. There is nothing to suggest that increasing the maximum allowable number of four-legged furry pets would be either too burdensome to implement or too impossible to police. The Pet Ownership Policy should be given more flexibility so that those who want pets, and those who have pets already when they begin public housing residence, can enjoy these benefits to the fullest extent possible.

Response: The current pet policy allows tenants to have multiple pets, but not in the same category. Because the project managers have a difficult enough time enforcing the pet policy now, HCDCH does not agree to increase the maximum number of allowable pets in the same category.

- c. A major drawback of the Pet Ownership Policy is that "pets" are defined to be exclusively "cats, dogs, birds, and fish." While these may be the most popular pets in American society, there are many people who suffer from allergens, yet would still prefer something other than a fish or bird. Non-poisonous reptiles (turtles, for example) are complete excluded from consideration, without any apparent justification. If the HCDCH needs concrete limits, it should undertake further study to determine which types of animals should be categorically excluded, and which should be potentially permissible. As the Pet Ownership Policy stands, it is too rigid to adequately address the needs and desires of all residents.

Response: With over 13,000 residents in public housing throughout the state, it is not practical or possible to address everyone's needs and desires. As stated in the response in 14b, the project managers have a difficult time enforcing the pet policy now. HCDCH does not agree to allow other types of pets at this time.

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

No public hearing comments were received on the Civil Rights Certifications section.

16. Audit

No public hearing comments were received on the Audit section.

17. Asset Management

No public hearing comments were received on the Asset Management section.

18. Other Information

No public hearing comments were received on the Other Information section.