

RAB Comments and HPHA Response Updated 3/9/10

Changes and New Objectives Contained in the 2010 PHA Annual Plan (FY 2011)

1. PMMSB will be restructured to better deal with Asset Management requirements. The positions and assigned duties can be adjusted to better accomplish the goals of Asset Management.
RAB Position:
The RAB's position is "Neither Disagree or Support" HPHA.
2. HPHA will use Asset Management conversion as an opportunity to assess the viability of individual housing project sites. Are there some that cannot adequately function under the Asset Management model? Should sites be combined or shuffled to different AMPs?
RAB Position:
The RAB's position is "Neither Disagree or Support" HPHA.
3. HPHA will identify public housing project sites which are appropriate for mixed-finance/mixed income redevelopment (HPHA Board Vision)
RAB Position:
The RAB supports the HPHA Boards vision.
4. HPHA is contracting with 2 architectural firms to do renovation design for 50 Type C units.
RAB Position:
The RAB's position is "Neither Disagree or Support" HPHA.
5. HPHA is including ADA renovation to the scope of work on contracts.
RAB Position:
The RAB supports ADA renovations on future work contracts
6. The Ameresco report was accepted by HPHA Board; an Energy Services Agreement will be signed and will proceed during the PHA Plan period.
RAB Position:
Due to insufficient information provided, The RAB position is "Neither Disagree or Support" HPHA.
HPHA Response: HPHA will continue to discuss item with RAB.
7. KPT redevelopment contracts are proceeding and will move forward during the PHA Plan period.
RAB Position:
The RAB was not involved in the redevelopment of KPT and therefore cannot respond.
8. Wait List/Tenant Selection changes:
 - a) Prospective new tenants will undergo pre-placement suitability assessment in the form of credit checks and home visits
RAB Position:
The RAB suggests 2-3 References be required, 2 landlord if less than one year at current residence and a Personal reference. The RAB feels "Home Visits" violates the privacy of the future tenant
HPHA Response: Repair costs and repair orders due to tenant-caused damage are substantial and HPHA must address the problem so that labor and funding can be applied to improving the properties rather than

on damages that should not have occurred. Screening prospective tenants to determine whether they are likely to care for their units is an important part of this effort, and is supported by HUD and federal regulations. (24 CFR 960.203) HPHA will continue to discuss implementation with RAB.

b) HPHA will convert from Geographical to Site-based waiting lists

RAB Position:

The RAB does not support site-based waiting list due to insufficient information provided as to how this would be implemented.

HPHA Response: HPHA will continue to discuss the implementation of this policy with RAB. This approach is supported by HUD. Geographical waiting lists do not support an Asset Management-centered approach with responsibility on the AMP. Site-based waiting lists are a way to fill units more quickly, since each person on a site-based list has indicated they will accept housing at that site when available. Currently, turn-downs from those at the top of the list cause delays in filling vacancies.

c) A new wait list preference will be created for non-elderly disabled who live in an elderly-designated building and are willing to move to another project site

RAB Position:

The RAB supports the wait list preference for non-elderly disabled, who live in an elderly-designated building and are willing to move to another project site.

d) The Homeless preference will be restricted to those who are currently in a shelter and following a service plan

RAB Position:

The RAB does not agree the “Homeless Preference” should be restricted to those currently in a shelter and following a service plan. The RAB feels as long as a homeless family is following a service plan, they should not also be penalized for not living in a shelter as defined by the agency.

HPHA Response: HPHA will continue to discuss item with RAB at the February meeting. This is necessary to reduce rent delinquencies and property damage. Experience with this preference has shown that people who are currently in a shelter are better prepared by the services offered in the shelter to be responsible renters. In addition, people have been able to “work the waitlist” by becoming homeless for a short period in order to obtain the preference and jump ahead of others who have been waiting.

9. HPHA will implement standards requiring repair within 270 days for any new long-term vacant units

RAB Position:

The RAB feels 270 days is too long. Future Type C units should be completed within 90 days.

HPHA Response: 90 days is not sufficient time to do planning, procurement, design and construction for units with significant damage.

10. HPHA will review policies and procedures to ensure compliance with the Violence Against Women Act (VAWA)

RAB Position:

The RAB’s position is “Neither Disagree or Support” HPHA.

11. HPHA will review our compliance with the HUD Community Service and Self-Sufficiency requirements and adjust policies as needed

RAB Position:

Due to insufficient information provided, The RAB's position is "Neither Disagree or Support" HPHA.

12. HPHA will assess its Resident Services program to assure ability to:

- link residents to community services,
- increase community involvement
- support self-sufficiency efforts (HPHA Board Vision)
- encourage formation of more Resident Associations
- expand Resident Patrols

RAB Position:

The RAB Highly Recommends this be implemented back into the Resident Services Program

13. Establish a safety and security program (HPHA Board Vision)

RAB Position:

The RAB supports the HPHA Board's Vision to establish a safety and security program.

14. Move forward with Resident Monitors, and amend the ACOP (Admissions and Continued Occupancy Policy) to allow for free rent for federal public housing Resident Monitor households by exempting for rent calculation purposes all the income for each member of the Resident Monitor's household.

RAB Position:

The RAB agrees this program be implemented as a regular program.

15. Improve the timeliness of evictions: current standard is start within 90 days of delinquency of one full month's rent; the standard will become 60 days for FY 2010; then 30 for FY 2011.

RAB Position:

The RAB does not support the 30 days for the timeline of evictions because of the fact, as an example, it takes 2 months for rent recalculations to be completed when an interim is requested, therefore, residents awaiting rent adjustments are unfairly referred for eviction while awaiting their rent adjustment. The administrative process needs to be more efficient and timely in completing interim rent adjustments.

The RAB supports the 90, and 60 days

HPHA Response: HPHA will modify the draft to say that the eviction process must commence within 60 days, and will exclude tenants in compliance with a payment plan. The 30 day standard will be removed from the proposed plan.

16. Abate 100% of emergency work orders w/in 24 hours; tenant requested work within 25 days

RAB Position:

The RAB supports 100% abatement of emergency work orders w/in 24 hours and 14 days for tenant requested work.

HPHA Response: In some cases 14 days is not enough time to obtain contractors and materials for repairs. The repairs are made as soon as possible when labor and materials are available. The 25 days is the maximum; AMPs are required to make repairs as soon as possible, but no more than 25 days after the request.

17. Review and standardize House Rules for all sites

RAB Position:

The RAB's position is "Neither Disagree or Support" at this time until further review of the 'Proposed Standardize Rules" for all sites.

HPHA Response: HPHA will continue to discuss standardized house rules with RAB.

18. Seek additional Housing Choice Vouchers as available from HUD

RAB Position:

The RAB agrees with seeking additional Housing Choice Vouchers as available from HUD.