AGENDA OF THE
GREEN BAY HOUSING AUTHORITY

THURSDAY, OCTOBER 17, 2019, 10:30 AM
CITY HALL, ROOM 604 - THE HARRY MAIER ROOM

A. Roll Call.

1. William VandeCastle - Chair, Terri Refsguard - Vice Chair, Sandra Popp, Mary Borowitz, and Stephen Srubas

B. Approval of the Agenda.

1. Approval of the agenda for the October 17, 2019, meeting of the Green Bay Housing Authority.

C. Approval of Minutes.

1. Approval of the minutes from the August 15, 2019, meeting of the Green Bay Housing Authority.

D. Regular Business.

1. Consideration with possible action to approve the reclassification of the Property Manager position to the Housing Administrator position.
2. Consideration with possible action to amend Chapter 3 - (Eligibility) of the Admission and Continued Occupancy Plan.
3. Consideration with possible action to amend Chapter 5 - (Occupancy Standards and Unit Offers) of the Admissions and Continued Occupancy Plan.
4. Consideration with possible action to amend Chapter 6 - (Income and rent Determinations) of the Admissions and Continued Occupancy Plan.
5. Consideration with possible action to amend Chapter 7 - (Verification) of the Admissions and Continued Occupancy Plan.
6. Consideration with possible action to amend Chapter 8 - (Leasing and Inspections) of the Admissions and Continued Occupancy Plan.

E. Informational.

1. GBHA Bills.
2. GBHA Financial Report.
3. Langan Report.
4. Director's Report.
5. Occupancy Report for the month of October.
6. Date of next meeting: November 21, 2019.

F. Adjournment.

1) THIS MEETING IS RECORDED: THE VIDEO OF THIS MEETING AND MINUTES ARE AVAILABLE ONLINE AT www.greenbaywi.gov
2) ACCESSIBILITY: Any person wishing to attend who requires special accommodation because of a disability, should contact the City Safety Manager at 920-448-3125 at least 48 hours before the scheduled meeting time so that arrangements can be made.
3) QUORUM: Please take notice that a majority or quorum of the Common Council will attend this Green Bay Housing Authority meeting and will constitute a meeting of the Common Council for purposes of discussion and information gathering relative to this agenda.
4) REPRESENTATION: The party requesting the communication, or their representative, should be present at this meeting.

MINUTES OF THE
GREEN BAY HOUSING AUTHORITY

THURSDAY, AUGUST 15, 2019, 10:30 AM
CITY HALL, ROOM 604 - THE HARRY MAIER ROOM

A. ROLL CALL.

1. William VandeCastle - Chair, Terri Refsguard - Vice Chair, Sandra Popp, Nathalie Lund and Stephen Srubas

Members present: Stephen Srubas, Terri Refsguard, Sandra Popp and Nathalie Lund, Excused: William VandeCastle, Absent: None

B. APPROVAL OF THE AGENDA.

1. Approval of the agenda for the August 15, 2019, meeting of the Green Bay Housing Authority.

Moved by Stephen Srubas seconded by Terri Refsguard to approve of the agenda for the August 15, 2019 meeting of the Green Bay Housing Authority. Motion carried.

Yes-Stephen Srubas, Sandra Popp, Terri Refsguard, Nathalie Lund, No-None, Abstain-None

C. APPROVAL OF MINUTES.

1. Approval of the minutes from the June 20, 2019, meeting of the Green Bay Housing Authority.

Moved by Stephen Srubas seconded by Nathalie Lund to approve of the minutes from the June 20, 2019 meeting of the Green Bay Housing Authority. Motion carried.

Yes- Stephen Srubas, Sandra Popp, Terri Refsguard, Nathalie Lund, No-None, Abstain-None

D. REGULAR BUSINESS.

1. Consideration with Possible Action to award the roofing and siding contracts to the lowest responsive and responsible bidder.

Moved by Stephen Srubas seconded by Sandra Popp to approve of awarding the roofing and siding contracts to the lowest responsive and responsible bidder. Motion carried.

Yes-Stephen Srubas, Sandra Popp, Terri Refsguard, Nathalie Lund, No-None, Abstain-None

2. Consideration with Possible Action to award the lightning rod protection contract for Mason Manor to Eland Electric.

Moved by Terri Refsguard seconded by Stephen Srubas to approve of awarding the lightning rod protection contract for Mason Manor to Eland Electric. Motion carried.

Yes-Stephen Srubas, Sandra Popp, Terri Refsguard, Nathalie Lund, No-None, Abstain- None

3. Consideration with possible action to amend Chapter 00 - (Introduction) of the Admissions and Continued Occupancy Plan.

Moved by Sandra Popp seconded by Nathalie Lund to approve of amending Chapter 00- (Introduction) of the Admissions and Continued Occupancy Plan. Motion carried.

Yes-Stephen Srubas, Sandra Popp, Terri Refsguard, Nathalie Lund, No-None, Abstain- None

4. Consideration with possible action to amend Chapter 2 - (Fair Housing and Equal Opportunity) of the Admissions and Continued Occupancy Plan.

Moved by Stephen Srubas seconded by Terri Refsguard to approve of amending Chapter 2 - (Fair Housing and Equal Opportunity) of the Admissions and Continued Occupancy Plan. Motion carried.

Yes-Nathalie Lund, Stephen Srubas, Terri Refsguard, Sandra Popp, No-None, Abstain-None

5. Consideration with Possible Action to amend Chapter 4 - Applications, Waiting List and Tenant Selection of the Admissions and Continued Occupancy Plan.

Moved by Sandra Popp seconded by Terri Refsguard to approve of amending Chapter 4- Applications, Waiting List and Tenant Selection of the Admissions and Continued Occupancy Plan. Motion carried.

Yes-Stephen Srubas, Sandra Popp, Nathalie Lund, Terri Refsguard, No-None, Abstain-Non

6. Consideration with possible action to amend the House Rules Addendum within the Green Bay Housing Authority's lease packet.

Moved by Stephen Srubas seconded by Sandra Popp to approve of amending the House Rules Addendum within the Green Bay Housing Authority's lease packet. Motion carried.

Yes-Stephen Srubas, Sandra Popp, Terri Refsguard, Nathalie Lund, No- None, Abstain- None

E. INFORMATIONAL.

1. GBHA Bills.

Stephanie Schmutzer presented the GBHA Bills. No action needed,

2. GBHA Financial Report.

Stephanie Schmutzer presented the GBHA Financial Report. No action needed.

3. Langan Report.

Cheryl Renier-Wigg presented the Langan Report. No action needed.

4. Director's Report.

Cheryl Renier-Wigg presented the Director's Report. No action needed.

5. Occupancy Report for the months of July and August 2019.

Jayme Valentine presented the Occupancy Report for the months of July and August 2019. No action needed.

6. Date of next meeting: September 19, 2019.

F. ADJOURNMENT.

Moved by Stephen Srubas seconded by Sandra Popp to adjourn the Green Bay Housing Authority meeting. Motion carried.

Yes- Nathalie Lund, Terri Refsguard, Sandra Popp, Stephen Srubas, No-None, Abstain-None

Report to the
Housing Authority of the City of Green Bay

MEETING DATE	PREPARED BY
October 17, 2019	Cheryl Renier-Wigg, Staff

AGENDA ITEM # D.1.

Consideration with possible action to approve the reclassification of the Property Manager position to the Housing Administrator position.

BACKGROUND

In September, 2018, the Housing Administrator position became vacant. The Housing Administrator duties were absorbed by the Assistant Development Director and the Property Manager on a trial basis while the department evaluated whether the Housing Administrator position should be filled. The Housing Administrator had oversight of the Green Bay Housing Authority and the Brown County Housing Authority. In January, 2019 Brown County took oversight of the Brown County Housing Authority.

The Property Manager has taken on the following duties that were previously performed by the Housing Administrator:
- Directs overall administration of the Housing Authority's programs and projects. Ensures that all programs are operated in compliance with all applicable regulations and within the agency's budget.
- Assist the Executive Director in the development and implementation of goals, objectives, policies, plans and procedures.
- Responsible for all contractual agreements including projects that subjected to Federal Davis Bacon requirements.
- Coordinates the Housing Authority's property acquisition and relocation.
- Assist and strategize with the Executive Director on the implementation of affordable housing initiatives.
- Responds to the public, investors, tenants, and prospective tenants, governing boards, elected officials and the media on all programs, regulations, promotions, and problems.

The Property Manager has also taken on the following new duties:
Assist the Executive Director with repositioning of the public housing units.

The Assistant Director has taken on the higher level duties regarding the repositioning of the public housing units, working to end homelessness, affordable housing development and partnering with other housing related community agencies.

The Housing Administrator position was reviewed by the Human Resources Department with a recommendation that the Property Manager position be changed to the Housing Administrator position and be moved from a Grade J up to a Grade K.

There is no grade change for the Assistant Director position but the percentage of time billed to the GBHA will increase from 10 percent to 20 percent. The elimination of one position will be an overall net savings to the GBHA.

RECOMMENDATION

To approve the reclassification of the Property Manager position to the Housing Administrator position.

FISCAL IMPACT

ATTACHMENTS

1. Housing Administrator 2019

JOB DESCRIPTION
City of Green Bay

Position Title	Housing Administrator
Department	Community & Economic Development
Reports To	Assistant Director/Executive Director of Housing Authority
Position Status	Exempt
Salary Range	Grade K
Job Summary	Under general supervision of the Green Bay Housing Authority (GBHA) Executive Director, performs work of considerate difficulty in administration of program and policies of the GBHA which include management of Mason Manor and scattered site public housing.
Essential Functions	1) Assists Executive Director in development of policy, plans, and direction of GBHA. 2) Supervises Mason Manor and Scattered Sites staff. Oversees work schedules, authorizes overtime requests and approves time cards. Evaluates work performance and other personnel matters, including discipline. 3) Manages GBHA rental units at Mason Manor and Scattered Sites, including building safety and security measures, leases and re-certifications, evictions and fraud recovery actions which may include court appearances and repayment agreements. Coordinates vacant unit turn-around, including but not limited to scheduling maintenance needs and contractor work, managing Mason Manor and scattered sites waiting lists, conducting required criminal and suitability checks. 4) Directs and manages GBHA contracts. Works cooperatively with the Executive Director, Purchasing and Public Works Department to coordinate purchases, capital improvement projects and property management contracts which include budgeting, scheduling, approvals and follow-up. 5) Coordinates and oversees Mason Manor cell tower leases to include maintenance work and upgrades. 6) Works with Executive Director and Accountant in the creation of budgets and capital improvement plans. 7) Administers all Federal, GBHA and City policies and procedures for public housing properties and maintains and submits reports to HUD or other authorities as required by program guidelines. 8) Submits, tracks and processes automatic electronic payments through local contracted financial institution. Prepares and conducts bank deposits and generates monthly financial reports. Performs accounts payable functions. 9) Responds to the public, GBHA tenants, governing boards, elected officials and the media on GBHA-related information 10) Performs other duties as assigned.
Knowledge, Skills And Abilities	▪ Considerable knowledge of U.S. Department of Housing and Urban Development public housing regulations and procedures as well as rental/housing practices in accordance with Wisconsin State Statutes. Considerable knowledge of the principles and practices of effective supervision and office management to include organizing, assigning and supervising others. Good knowledge of generally accepted accounting principles. ▪ Ability to exercise independent judgment and to handle confidential information with

	discretion. Ability to work independently without specific instruction. Ability to communicate effectively both orally and in writing. Ability to establish and maintain effective working relationships with staff and the public. Ability to work effectively with a varied population and their families and support service agencies. Ability to proficiently utilize a computer and the required software. Ability to work the required hours of the position.
Minimum Education And Experience	▪ Bachelor's Degree in Business Administration, Human Services, Public Administration or related field. ▪ Five years related work experience. ▪ Previous supervisory experience desirable. ▪ A combination of equivalent experience and/or education may be considered.
Physical Requirements	Ability to perform the following activities: ▪ Lifting up to 10-20 pounds. ▪ Carrying up to 10-20 pounds. ▪ Frequent standing and sitting. ▪ Ability to focus for long period of time on projects. ▪ Ability to reach, stoop and lift.

The above is not to be construed as an exhaustive statement of duties, responsibilities or requirements. I have read the above position description and understand the duties and responsibilities of the position.

______________________________ _________________________

Employee Name (please print) Date

____

Employee Signature

Report to the
Housing Authority
of the City of Green Bay

MEETING DATE	PREPARED BY
October 17, 2019	Jayme Valentine, Staff

AGENDA ITEM # D.2.

Consideration with possible action to amend Chapter 3 - (Eligibility) of the Admission and Continued Occupancy Plan.

BACKGROUND

New updates were announced by the Department of Housing and Urban Development which the Green Bay Housing Authority is requesting to adopt.

Part 1: Definitions of Family and Household Members:
Key changes include updates to the web addresses and Public and Indian and Housing Notice numbers, guidance for how to proceed for a family that breaks up while on the waiting list, and definition updates.

Part 2: Basic Eligibility Criteria:
Key changes include updates to web addresses and references to other chapters within the ACOP and disclosure of social security numbers.

Part 3 Denial of Admission:
Key changes include updates to criminal records, the timeframe an applicant is denied for anything drug or violent related (three years for a misdemeanor or five years for a felony), and how the GBHA processes an application that has a debt to a previous landlord.

RECOMMENDATION

Staff is recommending approval to amend Chapter 3 - (Eligibility) of the Admission and Continued Occupancy Plan.

FISCAL IMPACT

ATTACHMENTS

1. Chapter 3- Eligibility - draft revisions (Autosaved)

Chapter 3
ELIGIBILITY

INTRODUCTION

The GBHA is responsible for ensuring that every individual and family admitted to the public housing program meets all program eligibility requirements. This includes any individual approved to join the family after the family has been admitted to the program. The family must provide any information needed by the GBHA to confirm eligibility and determine the level of the family's assistance.

To be eligible for the public housing program:

- The applicant/family must:
  - Qualify as a family as defined by HUD and the GBHA
  - Have income at or below HUD-specified income limits
  - Qualify on the basis of citizenship or the eligible immigrant status of family members
  - Provide social security number information for household members as required
  - Consent to the GBHA's collection and use of family information as provided for in GBHA-provided consent forms
- The GBHA must determine that the current or past behavior of household members does not include activities that are prohibited by HUD or the GBHA.

This chapter contains three parts:

> Part I: Definitions of Family and Household Members. This part contains HUD and GBHA definitions of family and household members and explains initial and ongoing eligibility issues related to these members.
> Part II: Basic Eligibility Criteria. This part discusses income eligibility, and rules regarding citizenship, social security numbers, and family consent.
> Part III: Denial of Admission. This part covers factors related to an applicant's past or current conduct that can cause the GBHA to deny admission.

PART I: DEFINITIONS OF FAMILY AND HOUSEHOLD MEMEBRS

3-1.A. OVERVIEW

Some eligibility criteria and program rules vary depending upon the composition of the family requesting assistance. In addition, some requirements apply to the family as a whole and others apply to individual persons who will live in the public housing unit. This part provides information that is needed to correctly identify family and household members, and explains HUD's eligibility rules.

3-1.B. FAMILY AND HOUSEHOLD [24 CFR 5.105(a)(2), 24 CFR 5.403, FR Notice 02/03/12, and Notice PIH 2014-20]~~[24 CFR 5.403 and HUD-50058 IB, p. 13]~~

The term *family* and *household* have different meanings in the public housing program.

Family

To be eligible for admission, an applicant must qualify as a family. *Family*, as defined by HUD, includes but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status, a single person, who may be an elderly person, disabled person, near-elderly person, or any other single person; or a group of persons residing together. Such group includes, but is not limited to a family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family), an elderly family, a near-elderly family, a disabled family, a displaced family, or the remaining member of a tenant family. The GBHA has the discretion to determine if any other group of persons qualifies as a family.

Gender Identity means actual or perceived gender characteristics.

Sexual orientation means homosexuality, heterosexuality, or bisexuality.

> GBHA Policy
> A family also includes two or more individuals who are not related by blood, marriage, adoption, or other operation of law, but who either can demonstrate that they have lived together previously or certify that each individual's income and other resources will be available to meet the needs of the family.
>
> Each family must identify the individuals to be included in the family at the time of application, and must update this information if the family's composition changes.
>
> A determination of eligibility for housing that is assisted by HUD or subject to a mortgage insured by the Federal Housing Administration shall continue to be made in accordance with eligibility requirements provided for such program by HUD, and such housing shall be made available without regard to actual or perceived sexual orientation, gender identity, or marital status, and
>
> No owner or administrator of HUD-assisted or HUD-insured housing may inquire about the sexual orientation or gender identity of an applicant for, or occupant of, HUD-assisted or HUD-insured housing for purposes of determining eligibility or otherwise making such housing available.

Household
Household is a broader term that includes additional people who, with the GBHA's permission, live in a public housing unit, such as live-in aides, foster children, and foster adults.

3-1.C. FAMILY BREAK-UP AND REMAINING MEMBER OF TENANT FAMILY

Family Break-Up

Except under the following conditions, the PHA has discretion to determine which members of an assisted family continue to receive assistance if the family breaks up:

- If the family breakup results from an occurrence of domestic violence, dating violence, sexual assault, or stalking, the PHA must ensure that the victim retains assistance. (For documentation requirements and policies related to domestic violence, dating violence, sexual assault, and stalking, see section 16-VII.D of this plan.)
- If a court determines the disposition of property between members of the assisted family, ~~in a divorce or separation decree,~~ the PHA is bound by the court's determination of which family members continue to receive assistance.

GBHA Policy
When a family on the waiting list breaks up into two otherwise eligible families, only one of the new families may retain the original application date. Other former family members may submit a new application with a new application date if the waiting list is open.

If a family breaks up into two otherwise eligible families while living in public housing, only one of the new families will retain occupancy of the unit.

If a court determines the disposition of property between members of an applicant or resident family~~ as part of a divorce or separation decree~~, the GBHA will abide by the court's determination.

In the absence of a judicial decision or an agreement among the original family members, the GBHA will determine which family will retain their placement on the waiting list or continue in occupancy. In making its determination, the GBHA will take into consideration the following factors: (1) the interest of any minor children, including custody arrangements; (2) the interest of any ill, elderly, or disabled family members; (3) the interest of any family member who is or has been the victim of domestic violence, dating violence, sexual assault or stalking, including a family member who was forced to leave a public housing unit as a result of such actual or threatened abuse, and provides documentation in accordance with section 16-VII.D of this ACP; (4) any possible risks to family members as a result of domestic violence or criminal activity; and (5) the recommendations of social service professionals.

Remaining Member of a Tenant Family [24 CFR 5.403]
The HUD definition of family includes the *remaining member* of a *tenant family*, which is a member of a resident family who remains in the unit when other members of the family have left the unit. Household members such as live-in aides, foster children, and foster adults do not qualify as remaining members of a family.

If dependents are the only "remaining members of a tenant family" and there is no family member able to assume the responsibilities of the head of household, see Chapter 6, Section 6-I.B. for the policy on "Caretakers for a Child".

3-I.D. HEAD OF HOUSEHOLD [24 CFR 5.504(b)]
Head of household means the adult member of the family who is considered the head for purposes of determining income eligibility and rent. The head of household is responsible for ensuring that the family fulfills all of its responsibilities under the program, alone or in conjunction with a co-head or spouse

GBHA Policy
The family may designate any qualified adult family member as the head of household.

The head of household must have the legal capacity to enter into a lease under state and local law. A minor who is emancipated under state law may be designated as head of household.

3-I.E. SPOUSE, CO-HEAD, AND OTHER ADULT

A family may have a spouse or co-head, but not both [HUD-50058 IB, p.13]

Spouse means the marriage partner of the head of household.

GBHA Policy
The term "spouse" includes the partner in a "common law" marriage as defined in state law. The term "spouse" does not apply to friends, roommates, or significant others who are not marriage partners. A minor who is emancipated under state law may be designated as a spouse.

A *co-head* is an individual in the household who is equally responsible with the head of household for ensuring that the family fulfills all of its responsibilities under the program, but who is not a spouse. A family can have only one co-head.

GBHA Policy
Minors who are emancipated under state law may be designated as a co-head.

Other adult means a family member, other than the head, spouse, or co-head, who is 18 years of age or older. Foster adults and live-in aides are not considered other adults [HUD-50058 IB, p.14].

3-I.F. DEPENDENT [24 CFR 5.603]
A *dependent* is a family member who is under 18 years of age or a person of any age who is a person with a disability or a full-time student, except that the following persons can never be dependents: the head of household, spouse, co-head, foster children/adults, and live-in aides. Identifying each dependent in the family is important because each dependent qualifies the family for a deduction from annual income, as described in Chapter 6.

Joint Custody of Dependents

GBHA Policy
Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or resident family 50 percent or more of the time.

When more than one applicant or assisted family (regardless of program) are claiming the same dependents as family members, the family with primary custody at the time of the initial examination or re-examination will be able to claim the dependents. If there is a dispute about which family should claim them, the GBHA will make the determination based on available documents such as court orders, school records, or other credible documentation.

3-I.G. FULL-TIME STUDENT [24 CFR 5.603]
A *full-time student* (FTS) is a person who is attending school or vocational training on a full-time basis. The time commitment or subject load that is needed to determine if attendance is full-time is defined by the educational institution.

Identifying each ~~full-time student~~FTS is important because (1) each family member that is an FTS ~~full-time student~~, other than the head, spouse, or co-head, qualifies the family for a dependent deduction, and (2) the income of such an FTS~~full-time students~~ is treated differently from the income of other family members.

3-1.H. ELDERLY AND NEAR-ELDERLY PERSONS, AND ELDERLY FAMILY

[24 CFR 5.100, 5.403, 945.105, and FR Notice 02/03/12]

Elderly Persons
An *elderly person* is a person who is at least 62 years of age ~~[24 CFR 5.100]~~.

Near-Elderly Persons
A *near-elderly person* is a person who is at least 50 years of age but below the age of 62 ~~[24 CFR 945.105]~~.

Elderly Family
An *elderly family* is one in which the head, spouse, cohead, or sole member is an elderly person. ~~An elderly family can consist of a family whose head, spouse, or sole member is at least 62 years of age; two or more persons who are at least 62 years of age living together; or one or more persons who are at least 62 years of age living with one or more live-in aides.~~

Identifying elderly families is important because these families qualify for the elderly family allowance and the medical allowance as described in Chapter 6 and may qualify for a particular type of development as noted in Chapter 4.

3-I.I. PERSONS WITH DISABILITIES AND DISABLED FAMILY [24 CFR 5.403, FR Notice 02/03/12]

Persons with Disabilities
Under the public housing program, special rules apply to persons with disabilities and to any family whose head, spouse, or co-head is a person with disabilities. The technical definitions of individual handicaps and persons with disabilities are provided in Exhibit 3-1 at the end of this chapter. These definitions are used for a number of purposes, including ensuring that persons with disabilities are not discriminated against based on disability.

As discussed in Chapter 2, the GBHA must make all aspects of the public housing program accessible to persons with disabilities and consider requests for reasonable accommodations when a person's disability limits their full access to the unit, the program, or the GBHA's services.

Disabled Family
A *disabled family* is one in which the head, spouse, or co-head is a person with disabilities. Identifying disabled families is important because these families qualify for the disabled family allowance and the medical allowance as described in Chapter 6, and may qualify for a particular type of development as noted in Chapter 4.

Even though persons with drug or alcohol dependencies are considered persons with disabilities for the purpose of non-discrimination, this does not prevent the GBHA from denying admission or taking action under the lease for reasons related to alcohol and drug abuse in accordance with the policies found in Part III of this chapter and in Chapter 13.

3-I.J. GUESTS [24 CFR 5.100]
A *guest* is defined as a person temporarily staying in the unit with the consent of the tenant or other member of the household who has express or implied authority to so consent.

-The lease must provide that the tenant has the right to exclusive use and occupancy of the leased unit by the members of the household authorized to reside in the unit in accordance with the lease, including reasonable accommodation of their guests [24 CFR 966.4(d)].. The head of household is responsible for the conduct of visitors and guests, inside the unit as well as anywhere on or near GBHA premises[24 CFR 966.4(f)].

GBHA Policy

A resident family must notify the GBHA when overnight guests will be staying in the unit for more than 3 days. A guest can remain in the unit no longer than 14 consecutive days or a total of 30 cumulative calendar days during any 12-month period.

A family may request an exception to this policy for valid reasons (i.e. care of a relative recovering from a medical procedure expected to last 20 consecutive days). Exceptions will not be ~~authorized unless~~authorized unless GBHA gives prior approval and the family can identify and provide documentation of the residence to which the guests will return.

Children who are subject to a joint custody arrangement or for whom a family has visitation privileges, that are not included as a family member because they live outside of the public housing unit more than 50 percent of the time, are not subject to the time limitations of guests as described above.

Former residents who have been terminated or evicted are not permitted as overnight guests.

Guests who represent the public housing unit address as their residence address or address of record for receipt of benefits or any other purposes will be considered unauthorized occupants. In addition, guests who remain in the unit beyond the allowable time limit will be considered to be unauthorized occupants, and their presence constitutes violation of the lease.

3-I.K. FOSTER CHILDREN AND FOSTER ADULTS

Foster adults are usually persons with disabilities, unrelated to the tenant family, who are unable to live alone [24 CFR 5.609(c)(2)].

The term *foster child* is not specifically defined by the regulations.

Foster children and *foster adults* that are living with an applicant or resident family are considered household members but not family members. The income of foster children/adults is not counted in family annual income and foster children/adults do not qualify for a dependent deduction [24 CFR 5.603 and HUD-50058 IB, pp. 13-14].

GBHA Policy

A *foster child* is a child that is in the legal guardianship or custody of a state, county, or private adoption or foster care agency, yet is care for by foster parents in their own homes, under some kind of short-term or long-term foster care arrangement with the custodial agency.

Children that are temporarily absent from the home as a result of placement in foster care are discussed in Section 3-I.L.

3-I.L. ABSENT FAMILY MEMBERS

Individuals may be temporarily or permanently absent from the unit for a variety of reasons including educational activities, placement in foster care, employment, and illness.

Definitions of Temporarily and Permanently Absent

GBHA Policy
Generally, an individual who is absent or is expected to be- absent from the public housing unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family member. Generally, an individual who is or is expected to be absent from the public housing unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.

Absent Students

GBHA Policy
When someone who has been considered a family member attends school away from home, the person will continue to be considered a family member unless information becomes available to the GBHA indicating that the student has established a separate household or the family declares that the student has established a separate household.

Absences Due to Placement in Foster Care [24 CFR 5.403]
Children temporarily absent from the home as a result of placement in foster care are considered members of the family.

GBHA Policy
If a child has been placed in foster care, the GBHA will verify with the appropriate agency whether and when the child is expected to ~~be~~ return~~ed~~ to the home. Unless the agency confirms that the child has been permanently removed from the home, the child will be counted a family member.

Absent Head, Spouse, or Co-Head

GBHA Policy
An employed head, spouse, or co-head absent from the unit for more than 180 consecutive days due to employment will continue to be considered a family member.

Individuals Confined for Medical Reasons

GBHA Policy
An individual confined to a nursing home or hospital on a permanent basis is not considered a family member.

If there is a question about the status of a family member, the GBHA will request verification from a responsible medical professional and will use this determination. If the responsible medical professional cannot provide a determination, the person generally will be considered temporarily absent. The family may present evidence that the family member is confined on a permanent basis and request that the person not be considered a family member.

Return of Permanently Absent Family Members

GBHA Policy

The family must request GBHA approval for the return of any adult family members that the GBHA has determined to be permanently absent. The individual is subject to the eligibility and screening requirements discussed in this chapter.

3-I.M. LIVE-IN AIDE

Live-in aide means a person who resides with one or more elderly person(s), or near-elderly persons, or persons with disabilities, and who: (1) is determined to be essential to the care and well-being of the person(s), (2) is not obligated for support of the person(s), and (3) would not be living in the unit except to provide necessary supportive services [24 CFR 5.403].

The GBHA must approve a live-in aide if needed as a reasonable accommodation for a person with disabilities in accordance with 24 CFR 8,

A *live-in aide* is considered a household member but not a family member. The income of the *live-in aide* is not counted in determining the annual income of the family [24 CFR 5.609(c)(5)]. Relatives may be approved as *live-in aides* if they meet all of the criteria defining a live-in aide. However, a relative who serves as a *live-in aide* is not considered a family member and would not be considered a remaining member of a tenant family.

GBHA Policy

A family's request for a *live-in aide* must be made in writing. From the request, the GBHA will verify the need for a *live-in aide* with a reliable, knowledgeable professional as provided by the family, such as a doctor, social worker, or case worker. For continued approval, the family must submit a new, written request, subject to GBHA verification, at each annual reexamination.

In addition, the family and *live-in aide* will be required to submit a certification stating that the *live-in aide* is (1) not obligated for the support of the person(s) needing the care, and (2) would not be living in the unit except to provide the necessary supportive services.

The GBHA will not approve a particular person as a *live-in aide*, and may withdraw such approval if [24 CFR 966.4(d)(3)(i)]:

The person commits fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;

The person has a history of drug-related criminal activity or violent criminal activity; or

The person currently owes rent or other amounts to the GBHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act.

Within 10 business days of receiving a request for a live-in aide, including all required documentation related to the request, the GBHA will notify the family of its decision in writing.

PARTII: BASIC ELIGIBILITY CRITERIA

3-II.A. INCOME ELIGIBILITY AND TARGETING

Income Limits
HUD is required by law to establish income limits that determine the income eligibility of applicants for HUD's assisted housing program, including the public housing program. The income limits are published annually and are based on HUD estimates of the median incomes for families of different sizes in a particular area or county.

Types of Low-Income Families [24 CFR 5.603(b)]
Low-Income Family. A family whose annual income does not exceed 80 percent of the median income for the area, adjusted for family size.

Very Low-Income Family. A family whose annual income does not exceed 50 percent of the median income for the area, adjusted for family size.

Extremely Low-Income Family. A family whose annual income does not exceed the federal poverty level or 30 percent of the median income for the area, whichever number is higher,adjusted for family size. (Used for income targeting only, not program eligibility.)

Area median income is determined by HUD, with adjustments for smaller and larger families.
HUD may establish income ceilings higher or lower than 30, 50, or 80 percent of the median income for an area if HUD finds that such variations are necessary because of unusually high or low family incomes. HUD also publishes over-income limits annually.

Using Income Limits for Eligibility [24 CFR 960.201]
Income limits are used for eligibility only at admission. Eligibility is established by comparing a family's annual income with HUD's published income limits. To be income eligible, the annual income of an applicant must be within the low-income limit.

Using Income Limits for Targeting [24 CFR 960.202(b)]
At least 40 percent of the families admitted from the GBHA waiting list to the public housing program during a GBHA fiscal year must be extremely low-income families. This is called the "basic targeting requirement."

The GBHA does not maintain a Housing Choice Voucher program.

For discussion of how income targeting is used in tenant selection, see Chapter 4.

3-II.B. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS [24 CFR 5, subpart E]
Housing assistance is available only to individuals who are U.S. citizens, U.S. nationals, or noncitizens that have eligible immigration status. At least one family member must be a citizen, national, or a noncitizen with eligible immigration status in order for the family to qualify for any level of assistance.

All applicant families must be notified of the requirement to submit evidence of their citizenship status when they apply. Where feasible, an in accordance with the GBHA's Limited English Proficiency plan, the notice must be in a language that is understood by the individual if the individual is not proficient in English.

Declaration [24 CFR 5.508]

HUD requires each family member to declare whether the individual is a citizen, a national, or an eligible noncitizen, except those members who elect not to contend that they have eligible immigration status. Those who elect not to contend their status are considered to be ineligible noncitizens. For citizens, nationals, and eligible noncitizens, the declaration must be signed personally by the head, spouse, co-head, and any other family member 18 or older, and by a parent or guardian for minors. The family must identify in writing any family members who elect not to contend their immigration status (see Ineligible Noncitizens below). No declaration is required for live-in aides, foster children, or foster adults.

U.S. Citizens and Nationals

In general, citizens and nationals are required to submit only a signed declaration that claims their status. However, HUD regulations permit the GBHA to request additional documentation of their status, such as a passport.

> GBHA Policy
>
> Family members who declare citizenship or national status will not be required to provide additional documentation unless the GBHA receives information indicating that an individual's declaration may not be accurate.

Eligible Noncitizens

In addition to providing a signed declaration, those declaring eligible noncitizen status must sign a verification consent form and cooperate with GBHA efforts to verify their immigration status as described in Chapter 7. The documentation required for establishing eligible noncitizen status varies depending upon factors such as the date the person entered the U.S., the conditions under which eligible immigration status has been granted, the person's age, and the date on which the family began receiving HUD-funded assistance.

Lawful residents of the Marshall Islands, the Federated States of Micronesia, and Palau, together known as the Freely Associated States, or FAS, are eligible for housing assistance under section 141 of the Compacts of Free Association between the U.S. Government and the Governments of the FAS [Public Law 106-504].

Ineligible Noncitizens

Those noncitizens who do not wish to contend their immigration status are required to have their names listed on a non-contending family members listing, signed by the head, spouse, or co-head (regardless of citizenship status), indicating their ineligible immigration status. The GBHA is not required to verify a family member's ineligible status and is not required to report an individual's unlawful presence in the U.S. to the United States Citizenship and Immigration Services (USCIS).

Providing housing assistance to noncitizen students is prohibited [24 CFR 5.522]. This prohibition extends to the noncitizen spouse of a noncitizen student as well as to minor children who accompany or follow to join the noncitizen student. Such prohibition does not extend to the citizen spouse of a noncitizen student or to the children of the citizen spouse and noncitizen student. Such a family is eligible for prorated assistance as a mixed family.

Mixed Families

A family is eligible for admission as long as at least one member is a citizen, national, or eligible noncitizen. Families that include eligible and ineligible individuals are considered *mixed families*. Such families will be given notice that their assistance will be prorated, and that they may request a hearing if they contest this determination. See Chapter 6 for a discussion of how rents are prorated, and Chapter 14 for a discussion of grievance hearing procedures.

Ineligible Families [24 CFR 5.514(d), (e), and (f)]

The GBHA may elect to provide assistance to a family before the verification of the eligibility of the individual or one family member [24 CFR 5.512(b)]. Otherwise, no individual or family may be assisted prior to the affirmative establishment by the GBHA that the individual or at least one family member is eligible [24 CFR 5.512(a)].

> GBHA Policy
>
> The GBHA will not provide assistance to a family before the verification of at least one family member as a citizen, national, or eligible noncitizen.
>
> When the GBHA determines that an applicant family does not include any citizens, nationals, or eligible noncitizens, following the verification process, the family will be sent a written notice within 10 business days of the determination.
>
> The notice will explain the reasons for the denial of assistance and will advise the family of its right to request an appeal to the United States Citizenship and Immigration Services, or to request a~~n~~ ~~informal~~ grievance hearing with the GBHA. The grievance ~~informal~~ hearing with the GBHA may be request in lieu of the USCIS appeal, or at the conclusion of the USCIS appeal process. The notice must also inform the applicant family that assistance may not be delayed until the conclusion of the USCIS appeal process, but that it may be delayed pending the completion of the grievance ~~informal~~ hearing process.

Grievance hearing procedures are contained in Chapter 14.

Timeframe for Determination of Citizenship Status [24 CFR 5.508(g)]

For new occupants joining the resident family, the GBHA must verify status at the first interim or regular reexamination following the person's occupancy, whichever comes first.

If an individual qualifies for a time extension for the submission of required documents, the GBHA must grant such an extension for no more than 30 days [24 CFR 5.508(h)].

Each family member is required to submit evidence of eligible status only one time during continuous occupancy.

> GBHA Policy
>
> The GBHA will verify the status of applicants at the time other eligibility factors are determined.

3-II.C. SOCIAL SECURITY NUMBERS [24 CFR 5.216 and 5.218, Notice PIH 2012-10~~2010-3~~]

The applicant and all members of the applicant's household must disclose the complete and accurate social security number (SSN) assigned to each household member, and the documentation necessary to verify each SSN. If a child under age 6 has been added to an applicant family within the 6 months prior to program admission, an otherwise eligible family may be admitted to the program and must disclose and document the child's SSN within 90 days of admission. A detailed discussion of acceptable documentation is provided in Chapter 7.

Note: These requirements do not apply to noncitizens who do not contend eligible immigration status.

In addition, each participant who has not previously disclosed an SSN, has previously disclosed an SSN that HUD or the SSA determined was invalid, or has been issued a new SSN must submit their complete and accurate SSN and the documentation required to verify the SSN at the time of the next interim or annual reexamination or recertification. Participants age 62 or older as of January 31, 2010, whose determination of eligibility was begun before January 31, 2010, are exempt from this requirement and remain exempt even if they move to a new assisted unit.

The PHA must deny assistance to an applicant family if they do not meet the SSN disclosure and documentation requirements contained in 24 CFR 5.216.

~~**Social Security Number Disclosure**~~

~~In accordance with 24 CFR 5.216, applicants (including each member of the household) are required to disclose his/her assigned SSN, with the exception of the following individuals:~~

~~Those individuals who do not contend to have eligible immigration status (individuals who may be unlawfully present in the United States). These individuals in most instances would not be eligible for a SSN.~~

~~A family that consists of a single household member (including a pregnant individual) who does not have eligible immigration status is not eligible for housing assistance and cannot e housed.~~

~~A family that consists of two or more household members and at least one household member that has eligible immigration status, is classified as a mixed family, and is eligible for prorated assistance in accordance with 24 CFR 5.520. The GBHA may not deny assistance to mixed families due to nondisclosure of an SSN by an individual who does not contend to have eligible immigration status.~~

~~Existing program participants as of January 31, 2010, who have previously disclosed their SSN and HUD has determined the SSN to be valid. The GBHA may confirm HUD's validation of the participant's SSN by viewing the household's Summary Report or the Identity Verification Report on the EIV system.~~

~~Existing program participants as of January 31, 2010, who are 62 years of age or older, and had not previously disclosed a valid SSN. This exemption continues even if the individual moves to a new assisted unit.~~

~~**Social Security Number Documentation**~~

~~Assistance cannot be provided to a family until all SSN documentation requirements are met.~~

~~The GBHA must request the applicant (including each member of the household), who are not exempt under the list above, to provide documentation of each disclosed SSN. Acceptable evidence of the SSN consists of:~~

~~An original SSN card issued by SSA;~~
~~An original SSA-issued document, which contains the name and SSN of the individual; or~~
~~An original document issued by a federal, state, or local government agency, which contains the name and SSN of the individual~~

~~It should be noted that most (if not all) individuals who are lawfully present in the U.S. have been assigned a SSN. Many existing laws required the disclosure of the SSN for various purposes. All applicants are required to disclose his/her assigned SSN.~~

~~The SSA issues three types of Social Security cards depending on an individual's citizen or noncitizen status and whether or not a noncitizen is authorized by the Department of Homeland Security (DHS) to work in the United States. They include:~~

~~The first type of card shows the individual's name and SSN only. This is the card most people have and reflects the fact that the holder can work in the U.S. without restriction. SSA issues this card to:~~

~~U.S. citizens; or~~
~~Noncitizens lawfully admitted to the United States for permanent residence and noncitizens with DHS permission to work permanently in the United States (i.e. refugees and asylees).~~

~~The second type of card bears, in addition the individual's name and SSN, the legend: "NOT VALID FOR EMPLOYMENT". SSA issues this card to lawful noncitizens who do not have DHS permission to work, but are required by law to provide a SSN to obtain general assistance benefits that they already have qualified for.~~
~~The third type of card bears, in addition to the individual's name and SSN, the legend "VALID FOR WORK ONLY WITH DHS AUTHORIZATION". SSA issues this card to people with DHS permission to work temporarily in the United States.~~

~~SSA verifies all noncitizens' documents with DHS before a SSN card is issued to a noncitizen.~~

~~If a new member is added to the family, the new member's SSN documentation must be submitted at the family's next interim or regulation re-examination, whichever comes first. If any member of the family obtains a previously undisclosed SSN, or has been assigned a new SSN, the documentation must be submitted at the family's next regularly scheduled re-examination.~~

~~The GBHA must deny admission to an applicant family if they do not meet the SSN disclosure, documentation and verification, and certification requirements contained in 24 CFR 5.216.~~

~~Applicants Without an Assigned Social Security Number~~
~~It is not uncommon for certain individuals to not have a SSA-assigned SSN. Below is a listing of such individuals, which is not all-inclusive:~~

~~Newborn children (these individuals will be issued a SSN upon SSA confirmation of birth)~~
~~Noncitizens lawfully present in the U.S. (these individuals will be issued a SSN upon SSA confirmation of the individual's DHS documentation or confirmation that the individual is required by law to provide a Social Security number to receive general assistance benefits that they already have qualified for)~~
~~Noncitizens unlawfully present in the U.S. (these individuals cannot be assigned a SSN)~~

~~Citizens and lawfully present noncitizens, who state that they have not been assigned a SSN by the SSA, should make such declaration in writing and under penalties of perjury to the GBHA. The GBHA should maintain the declaration in the tenant file.~~

~~The GBHA may use the Alternate ID (ALTD ID) generator within the Public and Indian Housing information Center (PIC) to generate a unique identifier for those individuals who do not have or unable to disclose a SSN.~~

~~Penalties for Failure to Disclose and/or Provide Documentation of the SSN~~
~~In accordance with 24 CFR 5.218, the following penalties apply for noncompliance with the SSN disclosure and documentation requirements:~~

~~Applicants~~
~~The GBHA must deny the eligibility of an assistance applicant if s/he (including each member of the household required to disclose his/her SSN) does not disclose a SSN and/or provide documentation of such SSN. However, if the family is otherwise eligible to participate in the program, the family may maintain his/her position on the waiting list for a period of time as determined by the GBHA. If all household members have not disclosed their SSN at the time a unit becomes available, the GBHA must offer the available unit to the next eligible applicant family on the waiting list.~~

3-II.D. FAMILY CONSENT TO THE RELEASE OF INFORMATION [24 CFR 5.230]
HUD requires each adult family member, and the head of household, spouse, or co-head, regardless of age, to sign form HUD-9886, Authorization for the Release of Information ~~/~~Privacy Act Notice, and other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. Chapter 7 provides detailed information concerning the consent forms and verification requirements.

~~The consent form must contain, at a minimum, the following:~~
~~A provision authorizing HUD or the GBHA to obtain from State Wage Information Collection Agencies any information or materials necessary to complete or verify the application for participation or for eligibility for continued occupancy;~~
~~A provision authorizing HUD or the GBHA to verify with previous or current employers, income information pertinent to the family's eligibility for or level of assistance;~~
~~A provision authorizing HUD to request income information from the IRS and the Social Security Administration for the sole purpose of verifying income information pertinent to the family's eligibility or level of benefits; and~~
~~A statement that the authorization to release the information requested by the consent form expires 15 months after the date the consent form is signed.~~

The GBHA must deny admission to the program if any member of the applicant family fails to sign and submit these consent forms which allow the GBHA to obtain information that the GBHA has determined is necessary in administration of the public housing program [24 CFR 960.259(a) and (b)].

PART III: DENIAL OF ADMISSION

3-III.A. OVERVIEW

A family that does not meet the eligibility criteria set forth in Parts I and II must be denied admission.

In addition, HUD permits the GBHA to deny admission based on certain types of current or past behaviors of family members as discussed in this part. The GBHA's authority in this area is limited by the Violence again Women Reauthorization Act of 2013 (VAWA), which expressly prohibits the denial of admission to an otherwise qualified applicant on the basis that the applicant is or has been the victim of domestic violence, dating violence, sexual assault or stalking [24 CFR 5.2005(b)].

This part covers the following topics:

- Required denial of admission
- Other permitted reasons for denial of admission
- Screening
- Criteria for deciding to deny admission
- Prohibition against denial of admission to victims of domestic violence, dating violence, sexual assault or stalking
- Notice of eligibility or denial

3-III.B. REQUIRED DENIAL OF ADMISSION [24 CFR 960.204]

The GBHA is required to establish standards that prohibit admission of an applicant to the public housing program if they have engaged in certain criminal activity or if the GBHA has reasonable cause to believe that a household member's current use or pattern of use of illegal drugs, or current abuse or pattern of abuse of alcohol may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

Where the statute requires that the GBHA prohibit admission for a prescribed period of time after some disqualifying behavior or event, the GBHA may choose to continue that prohibition for a longer period of time [24 CFR 960.203(c)(3)(ii)].

HUD requires the GBHA to deny assistance in the following cases:

- Any member of the household who has been evicted from ~~federally-assisted~~federally assisted housing in the last 3 years for any misdemeanor charges and/or within the last 5 years for any felony charges ~~for~~ that are drug-related or criminal activity related. HUD permits but does not require the GBHA to admit an otherwise-eligible family if the household member has completed a GBHA-approved drug rehabilitation program or the circumstances which led to eviction no longer exist (e.g. the person involved in the criminal activity no longer lives in the household).

    GBHA Policy
    The GBHA will admit an otherwise-eligible family who was evicted from federally-assisted housing within the past five (5) years for drug-related criminal activity, if the GBHA is able to verify that the household member who engaged in the criminal activity has completed a supervised drug rehabilitation program approved by the GBHA, or the person who committed the crime is no longer living in the household.

- The GBHA determines that any household member is currently engaged in the use of illegal drugs. *Drug* means a controlled substance as defined in section 102 of the Controlled Substances Act [21 U.S.C. 802]. *Currently engaged in the illegal use of a drug* means a person has engaged in the behavior recently enough to justify a reasonable belief that there is a continuing illegal drug use by a household member [24 CFR 960.205(b)(1)].

  GBHA Policy
  Currently engaged in is defined as any use of illegal drugs during the previous six months.

- The GBHA has reasonable cause to believe that any household member's current use or pattern of use of illegal drugs, or current abuse or pattern of abuse of alcohol, may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

  GBHA Policy
  In determining reasonable cause, the GBHA will consider all credible evidence, including but not limited to, any record of convictions, arrests, or evictions of household members related to the use of illegal drugs or the abuse of alcohol. A conviction will be given more weight than an arrest. A record of arrest(s) will not be used as the basis for the denial or proof that the applicant engaged in disqualifying criminal activity. The GBHA will also consider evidence from treatment providers or community-based organizations providing services to household members.

- Any household member has ever been convicted of drug-related criminal activity for the production or manufacture of methamphetamine on the premises of federally assisted housing.

- Any household member is subject to a lifetime registration requirement under a state sex offender registration program.

3-III.C. OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION
HUD permits, but does not require the GBHA to deny admission for the reasons discussed in this section.

Criminal Activity [24 CFR 960.203(c)]
~~Under the Public Housing Assessment System (PHAS), PHAs that have adopted policies, implemented procedures, and can document successful screen out and deny admission to certain applicants with unfavorable criminal histories receive points.~~

The GBHA is responsible for screening family behavior and suitability for tenancy. In doing so, the GBHA may consider an applicant's history of criminal activity involving crimes of physical violence to persons or property and other criminal acts which would adversely affect the healthy, safety ~~,~~ or welfare of other tenants.

GBHA Policy
If any household member is currently engaged in, or has engaged in any of the following criminal activities, within the past three (3) years for any misdemeanor charges and/or within the past five (5) years for any felony charges, the family will be denied admission. The time period of denial

starts from the date of the offense or the date of release from incarceration (the later of the two dates).

Drug-related criminal activity, defined by HUD as the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug [24 CFR 5.100]. GBHA will deny admission to any applicant or household member who is charged with possession of drug paraphernalia ~~within the past 5 years.~~.

Violent criminal activity, defined by HUD as any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage [24 CFR 5.100].

Criminal activity that may threaten the health, safety, or welfare of other tenants [24 CFR 960.203(c)(3)].

Criminal activity that may threaten the health or safety of GBHA staff, contractors, subcontractors, or agents.

Criminal sexual conduct, including but not limited to sexual assault, incest, open and gross lewdness, or child abuse.

Evidence of such criminal activity includes, but is not limited to any record of convictions, arrests, or evictions for suspected drug-related or violent criminal activity of household members within the past five (5) years. A conviction for such activity will be given more weight than an arrest or an eviction. A record of arrest(s) will not be used as the basis for the denial or proof that the applicant engaged in disqualifying criminal activity.

In making its decision to deny assistance, the GBHA will consider the factors discussed in Section 3-III.E and 3-III.F. Upon consideration of such factors, the GBHA may, on a case-by-case basis, decide not to deny assistance.

Previous Behavior [960.203 (c) and (d) and PH Occ GB, p.48]
HUD authorizes the GBHA to deny admission based on relevant information pertaining to the family's previous behavior and suitability for tenancy.

In the event of the receipt of unfavorable information with respect to an applicant, the GBHA must consider the time, nature, and extent of the applicant's conduct (including the seriousness of the offense). As discussed in Section 3-III.F, the GBHA may also need to consider whether the cause of the unfavorable information may be that the applicant is the victim of domestic violence, dating violence, sexual assault or stalking.

GBHA Policy
The GBHA will deny admission to an applicant family if the GBHA determines that the family:

Has a pattern of unsuitable past performance in meeting financial obligations, including rent within the past five years, unless the applicant family can show documentation (signed agreement between the applicant and landlord or a receipt printed on the agency's letterhead or a receipt signed by the landlord including the manager's business card or contact information) that they are/were current in an arranged repayment agreement and/or satisfied any debt owed. Per the repayment agreement, the applicant must be able to provide GBHA proof of 3 consecutive months of repayment.

Has a pattern of disturbance of neighbors, destruction of property, or living or housekeeping habits at prior residences within the past five years ~~which,~~,which may adversely affect the health, safety, or welfare of other tenants.

Has a pattern of eviction from housing or termination from residential programs within the past five years (considering relevant circumstances).

Owes rent or other amounts to this or any other PHA or owner in connection with any assisted housing program.

Misrepresented or does not provide complete information related to eligibility, including income, award of preferences for admission, expenses, family composition or rent.

Fails to pay, ~~at a minimum, half of~~ the required security deposit due in full for the unit prior to moving in.

Has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program.

Has engaged in or threatened violent or abusive behavior toward GBHA personnel

> *Abusive or violent behavior towards GBHA personnel* includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.
>
> *Threatening* refers to oral or written threats or physical gestures that communicated intent to abuse or commit violence.

In making its decision to deny admission, the GBHA will consider the factors discussed in Section 3-III.E and 3-III.F. Upon consideration of such factors, the GBHA may, on a case-by-case basis, decide not to deny admission.

The GBHA will consider the existence of mitigating factors, such as loss of employment or other financial difficulties, before denying admission to an applicant based on the failure to meet prior financial obligations.

3-III.D. SCREENING

Screening for Eligibility
PHAs are authorized to obtain criminal conviction records from law enforcement agencies to screen applicants for admission to the public housing program. This authority assists the GBHA in complying with HUD requirements and GBHA policies to deny assistance to applicants who are engaging in or have engaged in certain criminal activities. In order to obtain access to the records, the GBHA must require every applicant family to submit a consent form signed by each adult household member [24 CFR 5.903].

The GBHA may not pass along to the applicant the costs of a criminal records check [24 CFR 960.204(d~~D~~)].

GBHA Policy
The GBHA will perform criminal background checks through a GBHA contracted private investigation agency for all adult household members.

PHAs are required to perform criminal background checks necessary to determine whether any household member is subject to a lifetime registration requirement under a state sex offender program in the state where the housing is located, as well as in any other state where a household member is known to have resided [24 CFR 960.204(a)(4)].

GBHA Policy
The GBHA requires that the contracted private investigation agency will use the Dru Sjodin National Sex Offender database to screen applicants for admission.

Additionally, the GBHA must ask whether the applicant, or any member of the applicant's household, is subject to a lifetime registered sex offender registration requirement in any state [Notice PIH 2012-28].

If the GBHA proposes to deny admission based on a criminal record or on lifetime sex offender registration information, the GBHA must notify the household of the proposed action and must provide the subject of the record and the applicant a copy of the record and an opportunity to dispute the accuracy and relevance of the information prior to a denial of admission [24 CFR 5.903(f) and 5.905(d)].

Obtaining Information from Drug Treatment Facilities [24 CFR 960.205]
HUD authorizes PHAs to request and obtain information from drug abuse treatment facilities concerning applicants. Specifically, the GBHA may require each applicant to submit for all household members who are at least 18 years of age, and for each family head, spouse, or co-head regardless of age, one or more consent forms signed by such household members that requests any drug abuse treatment facility to inform the GBHA whether the drug abuse treatment facility has reasonable cause to believe that the household member is currently engaging in illegal drug use.

Drug Abuse Treatment Facility means any entity that holds itself out as providing, and provides, diagnosis, treatment, or referral for treatment with respect to the illegal drug use, and is either an identified unit within a general care facility, or an entity other than a general medical care facility.

Currently engaging in illegal use of a drug means illegal use of a drug that occurred recently enough to justify a reasonable belief that there is continuing illegal drug use by a household member.

Any consent form used for the purpose of obtaining information from a drug abuse treatment facility to determine whether a household member is currently engaging in illegal drug use must expire automatically after the GBHA has made a final decision to either approve or deny the admission of such person.

Any charges incurred by the GBHA for information provided from a drug abuse treatment facility may not be passed on to the applicant or tenant.

If the GBHA chooses to obtain such information from drug abuse treatment facilities, it must adopt and implement one of the two following policies:

Policy A: The GBHA must submit a request for information to drug abuse treatment facility for all families before they are admitted. The request must be submitted for each proposed household member who is at least 18 years of age, and for each family head, spouse, or co-head regardless of age.

Policy B: The GBHA must submit a request for information only for certain household members, whose criminal record indicates prior arrests or conviction for any criminal activity that may be a basis for denial of admission or whose prior tenancy records indicate that the proposed household member engaged in destruction of property or violent activity against another person, or they interfered with the right of peaceful enjoyment of the premises of other residents.

If the GBHA chooses to obtain such information, it must abide by the HUD requirements for records management and confidentiality as described in 24 CFR 960.205(f).

GBHA Policy
The GBHA will obtain information from drug abuse treatment facilities to determine whether any application family's household members are currently engaging in illegal drug activity only when the GBHA has determined that the family will be denied admission based on a family member 's drug related criminal activity and the family claims that the culpable family member has successfully completed a supervised drug or rehabilitation program.

The GBHA chooses to adopt and subsequently implement *Policy B*, and therefore will request, before any family is admitted, information from drug abuse treatment facilities to determine whether certain household members are currently engaging in illegal drug activity. ~~must submit a request for information only for certain household members~~ The GBHA will only request such information for household members~~,~~ whose criminal record indicates prior arrests or conviction for any criminal activity that may be a basis for denial of admission or whose prior tenancy records indicate that the proposed household member engaged in destruction of property or violent activity against another person, or they interfered with the right of peaceful enjoyment of the premises of other residents. Such household members will be required to sign one or more consent forms that request any drug abuse treatment facility to inform the ~~PHA~~GBHA of such information.

Screening for Suitability as a Tenant [24 CFR 960.203(c)]
The GBHA is responsible for the screening and selection of families to occupy public housing units. The GBHA may consider all relevant information. Screening is important to public housing communities and program integrity, and to ensure that assisted housing is provided to those families that will adhere to lease obligations.

GBHA Policy
The GBHA will consider the family's history with respect to the following factors:

Payment of rent and utilities or ~~over~~payments associated with a repayment agreement

Caring for a unit and premises

Respecting the rights of other residents and staff to the peaceful enjoyment of their housing

Criminal activity that is a threat to the health, safety, or property of~~r~~ others

Behavior of all household members as related to the grounds for denial as detailed in Section 3-III.B and C

Compliance with any other essential conditions of tenancy

Resources Used to Check Applicant Suitability [PH Occ GB, pp. 47-56]
PHAs have a variety of resources available to them for determination of the suitability of applicants. Generally, PHAs should reject applicants who have recent behavior that would warrant lease termination for a public housing resident.

GBHA Policy
In order to determine the suitability of applicants, the GBHA will examine applicant history for the past five years. Such background checks will include:

Past Performance in Meeting Financial Obligations, Especially Rent

GBHA and landlord references for the past five years, gathering information about past performance meeting rental obligations such as rent payment record, late payment record, whether the GBHA/landlord ever began or completed lease termination for non-payment, and whether utilities were ever disconnected in the unit. The ~~PHAs and~~ landlords will be asked if they would rent to the applicant family again. GBHA will use court records of eviction actions, other financial judgements and other databases to track past rental history information.

If an applicant has no rental ~~payment~~ history where he/she has never rented on his/her own then the GBHA will provide the applicant with the No Rental History Self-Certification form. Applicants with no rental history will need to sign and notarize this form in order for it to be considered complete.

~~, the GBHA will check court records of eviction actions and other financial judgments, and credit reports. A lack of credit history will not disqualify someone from becoming a public housing resident, but a poor credit rating may.~~

If an applicant provides GBHA with past landlord information, but the contact information is no longer valid (landlord's phone number change, landlord sold the property to new owner, there is no way to contact the landlord via telephone or mailing address), then GBHA will provide the applicant with the Self-Certification of Good Rental History form. This form will need to be signed and notarized in order for it to be considered complete.
~~Applicants with no rental payment history will also be asked to provide the GBHA with personal references. The references will be requested to complete a verification of the applicant's ability to pay rent if no other documentation of~~

~~ability to meet financial obligations is available. The applicant will also be required to complete a checklist documenting their ability to meet financial obligations.~~

~~If previous landlords or personal references do not respond to requests from the GBHA, or the applicant has no rental history the applicant may provide other documentation that demonstrates their ability to meet financial obligations (e.g. rent receipts, cancelled checks, etc.) or .~~

Disturbances of Neighbors, Destruction of Property or Living or Housekeeping Habits at Prior Residences that May Adversely Affect Health, Safety, or Welfare of Other Tenants, or Cause Damage to the Unit or the Development

GBHA~~PHA~~ and landlord references for the past five years, gathering information on whether the applicant kept a unit clean, safe, and sanitary; whether they violated health or safety codes; whether any damage was done by the applicant to a current or previous unit or the development, and, if so, how much the repair of the damage cost; whether the applicant's ~~housekeeping caused~~housekeeping caused insect or rodent infestation; and whether the neighbors complained about the applicant or whether the police were ever called because of disturbances.

Police and court records within the past five years will be used to check for any evidence of disturbance of neighbors or destruction of property that might have resulted in arrest or conviction. A record of arrest(s) will not be used as the basis for the denial or proof that the applicant engaged in disqualifying activity.

3-III.E. CRITERIA FOR DECIDING TO DENY ADMISSION

Evidence

GBHA Policy
The GBHA will use the preponderance of the evidence as the standard for making all admission decisions.

Preponderance of evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probably than not. Preponderance of evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

Consideration of Circumstances [24 CFR 960.203(c)(3) and (d)]
HUD authorizes the GBHA to consider all relevant circumstances when deciding whether to deny admission based on a family's past history except in the situations for which denial of admission is mandated (see Section 3-III.B).

In the event the GBHA receives unfavorable information with respect to an applicant, consideration must be given to the time, nature, and extent of the applicant's conduct (including the seriousness of the offense). In a manner consistent with its policies, the GBHA may give consideration to factors which might indicate a reasonable probability of favorable future conduct.

GBHA Policy

The GBHA will consider the following facts and circumstances ~~ors~~ prior to making its decision:

The seriousness of the case, especially with respect to how it would affect other residents' safety or property

The effects that denial of admission may have on other members of the family who were not involved in the action or failure to act

The extent of participation or culpability of individual family members, including whether the culpable family member is a minor or a person with disabilities, or (as discussed further in section 3-III.F) a victim of domestic violence, dating violence, sexual assault or stalking

The length of time since the violation occurred, including the age of the individual at the time of the conduct, as well as the family's recent history and the likelihood of favorable conduct in the future

While a record of arrest(s) will not be used as the basis for denial, an arrest may, however, trigger an investigation to determine whether the applicant actually engaged in disqualifying criminal activity. As part of its investigation, the GBHA may obtain the police report associated with the arrest and consider the reported circumstances of the arrest. The GBHA may also consider:

Any statements made by witnesses or the applicant not included in the police report

Whether criminal charges were filed

Whether, if filed, criminal charges were abandoned, dismissed, not prosecuted, or ultimately resulted in an acquittal

Any other evidence relevant to determining whether or not the applicant engaged in disqualifying activity

Evidence of criminal conduct will be considered if it indicates a demonstrable risk to safety and/or property

Evidence of the applicant family's participation in or willingness to participate in social service or other appropriate counseling service programs

In the case of drug or alcohol abuse, whether the culpable household member is successfully participating in or has successfully completed a supervised drug or alcohol rehabilitation program or has otherwise been rehabilitated successfully

The GBHA will require the applicant to submit evidence of the household member's current participation in or successful completion of a supervised drug or alcohol rehabilitation program, or evidence of otherwise having been rehabilitated successfully.

Removal of a Family Member's Name from the Application [24 CFR 960.203(c)(3)(i)]
Should the GBHA's screening process reveal that an applicant's household includes an individual subject to state lifetime registered sex offender registration, the GBHA must offer the family the opportunity to remove the ineligible family member from the household. If the family is unwilling to remove that individual from the household, the GBHA must deny admission to the family [Notice PIH 2012-28].

For other criminal activity, the GBHA may permit the family to exclude the culpable family members as a condition of eligibility. [24 CFR 960.203(c)(3)(i)].

GBHA Policy
As a condition of receiving assistance, a family may agree to remove the culpable family member from the application. In such instances, the head of household must certify that the family member will not be permitted to visit or to stay as a guest in the public housing unit.

After admission to the program, the family must present evidence of the former family member's current address upon GBHA request.

Reasonable Accommodation (PH Occ GB, pp. 58-60)
If the family includes a person with disabilities, the GBHA's decision concerning denial of admission is subject to consideration of reasonable accommodation in accordance with 24 CFR Part 8.

GBHA Policy
If the family indicates that the behavior of a family member with a disability is the reason for the proposed denial of admission, the GBHA will determine whether the behavior is related to the disability. If so, upon the family's request, the GBHA will determine whether alternative measures are appropriate as a reasonable accommodation. The GBHA will only consider accommodations that can reasonably be expected to address the behavior that is the basis of the proposed denial of admission. See Chapter 2 for a discussion of reasonable accommodation.

3-III.F. PROHIBITION AGAINST DENIAL OF ASSISTANCE TO VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT OR STALKING

The Violence against Women Reauthorization Act of 2013 (VAWA) and the HUD regulation at 24 CFR 5.2005(b) prohibits denial of admission to an otherwise qualified applicant on the basis that the applicant is or has been a victim of domestic violence, dating violence, sexual assault or stalking. ~~[24 CFR 5.2005(b)]. This section describes how the GBHA will comply with this prohibition.~~

Definitions of key terms used in VAWA are provided in section 16-VII of this ACOP, where general VAWA requirements and policies pertaining to notification, documentation, and confidentiality are also located.

~~**Definitions [24 CFR 5.2003]**~~
~~As used in VAWA:~~

> ~~Bifurcate. With respect to a public housing lease, to divide a lease as a matter of law such that certain tenants can be evicted or removed while the remaining family members' lease and occupancy rights are allowed to remain intact.~~
>
> ~~Domestic Violence. Includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.~~
>
> ~~Dating Violence. Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:~~
> ~~-The length of the relationship~~
> ~~-The type of relationship~~
> ~~-The frequency of interaction between the persons involved in the relationship~~
>
> ~~Stalking. To follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate or to place under surveillance with the intent to kill, injure harass or intimidate another person, and in the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotion harm to (1) that person, (2) a member of the immediate family of that person, or (3) the spouse of intimate partner of that person.~~
>
> ~~The term immediate family member means, with respect to a person a spouse, parent, brother or sister, or child of that person, or an individual to whom that person stands in the position or place of a parent, or any other person living in the household of that person and related to that person by blood and marriage.~~

Notification
VAWA 2013 expanded notification requirements to include the obligation for PHAs to provide applicants who are denied assistance with a notice of VAWA rights and the form HUD-~~50066~~ 5382 at the time the applicant is denied.

> GBHA Policy
> The GBHA acknowledges that a victim of domestic violence, dating violence, sexual assault or stalking may have an unfavorable history (e.g., a poor credit history, a record of previous damage to an apartment, a prior arrest record) that would warrant denial under the GBHA's policies. Therefore, if the GBHA makes a determination to deny admission to an applicant family on the basis of an unfavorable history, the GBHA will include in its notice of denial information about the protection against denial provided by VAWA in accordance with section 16-VII.C of this ACOP, a notice of VAWA rights, and ~~as well as including~~ a copy of the form HUD-50066. ~~and~~ ~~t~~The GBHA will request in writing that an applicant wishing to claim this protection notify the GBHA within ~~10~~14 business days.

Documentation

Victim Documentation [24 CFR 5.2007]

GBHA Policy
If an applicant claims the protection against denial of admission that VAWA provides to victims of domestic violence, dating violence sexual assault or stalking, the GBHA will request in writing that the applicant provide documentation supporting the claim in accordance with section 16-VII.D of this ACOP.

Perpetrator Documentation

GBHA Policy
If the perpetrator of the abuse is a member of the applicant family, the applicant must provide additional documentation consisting of one of the following:

A signed statement (1) requesting that the perpetrator be removed from the application and (2) certifying that the perpetrator will not be permitted to visit or to stay as a guest in the public housing unit

Documentation that the perpetrator has successfully completed, or is successfully undergoing, rehabilitation or treatment. The documentation must be signed by an employee or agent of a domestic violence service provider or by a medical or other knowledgeable professional from whom the perpetrator has sought or is receiving assistance in addressing the abuse. The signer must attest under penalty of perjury to his or her belief that the rehabilitation was successfully completed or is progressing successfully. The victim and perpetrator must also sign or attest to the documentation.

3-III.G. NOTICE OF ELIGIBILITY OR DENIAL
The GBHA will notify an applicant family of its final determination of eligibility in accordance with the policies in Section 4-III.E.

If the GBHA uses a criminal record or sex offender registration information obtained under 24 CFR 5, Subpart J, as the basis of denial, a copy of the record must precede the notice to deny, with an opportunity for the applicant to dispute the accuracy and relevance of the information before the GBHA can move to deny the application. In addition, a copy of the record must be provided to the subject of the record [24 CFR 5.903(f) and 5.905(d)].

GBHA Policy
If, based on a criminal record or sex offender registration information an applicant family appears to be ineligible, the GBHA will notify the family in writing of the proposed denial and provide a copy of the record to the applicant and to the subject of the record. The family will be given 10 business days to dispute the accuracy and relevance of the information. If the family does not contact the GBHA to dispute the information within that 10 day period, the GBHA will proceed with issuing the notice of denial of admission. A family that does not exercise their right to dispute the accuracy of the information prior to issuance of the official denial letter will still be given the opportunity to do so as part of the informal hearing process.

Notice requirements related to denying admission to noncitizens are contained in Section 3-II.B.

Notice policies related to denying admission to applicants who may be victims of domestic violence, dating violence, sexual assault or stalking are contained in Section 3-III.F.

EXHIBIT 3-1: DETAILED DEFINITIONS RELATED TO DISABILITIES

Person with Disabilities [24 CFR 5.403]
The term *person with disabilities* means a person who has any of the following types of conditions.

- Has a disability, as defined in 42 U.S.C. Section 423(d)(1)(A), which reads:

> Inability to engage in any substantial gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death or which has lasted or can be expected to last for a continuous period of not less than 12 months.
>
> In the case of an individual who has attained the age of 55 and is blind (within the meaning of "blindness" as defined in section 416(i)(1) of this title), inability by reason of such blindness to engage in substantial gainful activity, requiring skills or ability

comparable to those of any gainful activity in which he has previously engaged with some regularity and over a substantial period of time.

- Has a developmental disability as defined in the Developmental Disabilities Assistance and Bill of Rights Act [42 U.S.C. 6001(8)], which defines developmental disability in functional terms as:

  (A) IN GENERAL—The term *developmental disability* means a severe, chronic disability of an individual that-

    (i) Is attributable to a mental or physical impairment or combination of mental and physical impairments;

    (ii) Is manifested before the person attains age twenty-two;

    (iii) Is likely to continue indefinitely;

    (iv) Results in substantial functional limitations in three or more of the following areas of major life activity: (i) self-care, (ii) receptive and responsive language, (iii) learning, (iv) mobility, (v) self-direction, (vi) capacity for independent living, and (vii) economic self-sufficiency; and

    (v) Reflects the person's need for a combination and sequence of special interdisciplinary, or generic care, treatment, or other services which are of lifelong or extended duration and are individually planned and coordinated, ~~except that such term, when applied to infants and young children, means individuals from birth to age 5, inclusive, who have substantial developmental delay or specific congenital or acquired conditions with a high probability of resulting in developmental disabilities if services are not provided.~~

  (B) INFANTS AND YOUNG CHILDREN—An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting 3 or more of the criteria described in clauses (i) through (v) of subparagraph (A) if the individual, without services and supports, has a high probability of meeting those criteria later in life.

- Has a physical, mental, or emotional impairment that is expected to be of a long-continued and indefinite duration; substantially impedes his or her ability to live independently, and is of such a nature that ability to live independently could be improved by more suitable housing conditions.

People with acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for AIDS are not excluded from this definition.

A person whose disability is based solely on any drug or alcohol dependence does not qualify as a person with disabilities for the purposes of this program.

For purposes of reasonable accommodation and program accessibility for persons with disabilities, the term person with disabilities refers to an individual with handicaps.

Individual with Handicaps [24 CFR 8.3]
Individual with handicaps means any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such impairment. The term does not include any individual who is an alcoholic or drug abuser whose current use of alcohol or drugs prevents the individual from participating in the program or activity in question, or whose participation, by reason of such current alcohol or drug abuse, would constitute a direct threat to property or the safety of others. As used in this definition, the phrase:

(1) Physical or mental impairment includes:

   (a) Any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological, musculoskeletal, special sense organs, respiratory, including speech organs, cardiovascular, reproductive, digestive, genito-urinary, hemic and lymphatic, skin, and endocrine
   (b) Any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term physical or mental impairment includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech, and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, drug addiction, and alcoholism.

(2) Major life activities means functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.

(3) Has a record of such an impairment means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities.

(4) Is regarded as having an impairment means:

   (a) Has a physical or mental impairment that does not substantially limit one or more major life activities but that is treated by a recipient as constituting such a limitation
   (b) Has a physical or mental impairment that substantially limits one or more major life activities only as a result of the attitudes of others toward such impairment
   (c) Has none of the impairments defined in paragraph (a) of this section but is treated by a recipient as having such an impairment

Report to the
Housing Authority of the City of Green Bay

MEETING DATE	PREPARED BY
October 17, 2019	Jayme Valentine, Staff

AGENDA ITEM # D.3.

Consideration with possible action to amend Chapter 5 - (Occupancy Standards and Unit Offers) of the Admissions and Continued Occupancy Plan.

BACKGROUND

New updates were announced by the Department of Housing and Urban Development which the Green Bay Housing Authority is requesting to adopt.

Key changes include updating the maximum number of persons in each bedroom size to follow fair housing and the City of Green Bay Housing and Building codes, the process of offering units to families on the waiting list and Mason Manor's designation plan.

RECOMMENDATION

Staff is recommending approval to amend Chapter 5- (Occupancy Standards and Unit Offers) of the Admissions and Continued Occupancy Plan.

FISCAL IMPACT

ATTACHMENTS

1. Chapter 5- Occupancy Standards&Unit Offers

Chapter 5

OCCUPANCY STANDARDS AND UNIT OFFERS

INTRODUCTION
The GBHA must establish policies governing occupancy of dwelling units and offering dwelling units to qualified families.

This chapter contains policies for assigning unit size and making unit offers. The GBHA's waiting lists and selection policies are contained in Chapter 4. Together, Chapters 4 and 5 of the ACOP comprise the GBHA's Tenant Selection and Assignment Plan (TSAP).

Policies in this chapter are organized into two parts:

> Part I: Occupancy Standards. This part contains the GBHA's standards for determining the appropriate unit size for families of different sizes, compositions, and types.
>
> Part II: Unit Offers. This part contains the GBHA's policies for making unit offers, and describes actions to be taken when unit offers are refused.

PART I: OCCUPANCY STANDARDS

5-I.A. OVERVIEW
Occupancy standards are established by the GBHA to ensure that units are occupied by families of the appropriate size. This policy maintains the maximum usefulness of the units, while preserving them from underutilization or from excessive wear and tear due to overcrowding. Part I of this chapter explains the occupancy standards. These standards describe the methodology and factors the GBHA will use to determine the size unit for which a family qualifies, and includes the identification of the minimum and maximum number of household members for each unit size. This part also identifies circumstances under which an exception to the occupancy standard may be approved.

5-I.B. DETERMINING UNIT SIZE
In selecting a family to occupy a particular unit, the GBHA may match characteristics of the family with the type of unit available, for example, number of bedrooms [24 CFR 960.206(c)].

HUD does not specify the number of persons who may live in public housing units of various sizes. The GBHA is permitted to develop appropriate occupancy standards as long as the standards do not have the effect of discriminating against families with children [PH Occ GB, p.62].

Although the GBHA does determine the size of unit the family qualifies for under the occupancy standards, the GBHA does not determine who shares a bedroom/sleeping room.

The GBHA's occupancy standards for determining unit size must be applied in a manner consistent with fair housing requirements.

> GBHA Policy
> The GBHA will use the same occupancy standards for each of its developments.
>
> The GBHA's occupancy standards are as follows:

The GBHA will assign one bedroom for each two persons within the household, except in the following circumstances:

- Persons of the opposite sex (other than spouses and children under age 7) will not be required to share a bedroom
- Persons of different generations will not be required to share a bedroom
- Live-in aides will be allocated a separate bedroom
- Single person families will be allocated a zero bedroom unit
- Foster children will be included in determining unit size only if they will be in the household for more than 6 months

The GBHA will reference the following standards in determining the appropriate unit bedroom size for a family:

BEDROOM SIZE	MINIMUM NUMBER OF PERSONS	MAXIMUM NUMBER OF PERSONS
1	1	3~~2~~
2	2	6~~4~~
3	3	8~~6~~
4	4	10~~8~~

In determining bedroom size, the GBHA will include the presence of children to be born, children who are in the process of being adopted, children whose custody is being obtained, children who are temporarily away at school, or children who are temporarily in foster care.

5-I.C. EXCEPTIONS TO OCCUPANCY STANDARDS

Types of Exceptions

GBHA Policy
The GBHA will consider granting exceptions to the occupancy standards at the family's request if the GBHA determines the exception is justified by the relationship, age, sex, health or disability of family members, or other personal circumstances. GBHA will follow fair housing and the City of Green Bay housing/building codes.

For example, an exception may be granted if a larger bedroom size is needed for medical equipment due to its size and/or function, or as a reasonable accommodation for a person with disabilities. An exception may also be granted for a smaller bedroom size in cases where the number of household members exceeds the maximum number of persons allowed for the unit size in which the family resides (according to the chart in Section5-I.B.) and the family does not want to transfer to a larger size unit.

When evaluating exception requests, the GBHA will consider the size and configuration of the unit. In no case will the GBHA grant an exception that is in violation of local housing or occupancy codes, regulations or laws.

Requests from applicants to be placed on the waiting list for a unit size smaller than designated by the occupancy standards will be approved as long as the unit is not overcrowded according to local code, and the family agrees not to request a transfer for a period of two years from the date of admission, unless they have a subsequent change in family size or composition.

To prevent vacancies, the GBHA may provide an applicant family with a larger unit that the occupancy standards permit. However, in these cases the family must agree to move to a suitable, smaller unit when another family qualifies for the larger unit and there is an appropriate size unit available for the family to transfer to.

Processing of Exceptions

GBHA Policy

All requests for exceptions to the occupancy standards must be submitted in writing.

In the case of a request for exception as a reasonable accommodation, the GBHA will encourage the resident to make the request in writing. ~~using a reasonable accommodation request form.~~ However, the GBHA will consider the exception request any time the resident indicates that an accommodation is needed, whether or not a formal written request is submitted.

Requests for a larger size unit must explain the need or justification for the larger size unit, and must include appropriate documentation. Requests based on health-related reasons must be verified by letter from a ~~knowledgeable~~ medical professional ~~source~~, unless the disability and the disability-related request for accommodation is readily apparent or otherwise known.

The GBHA will notify the family of its decision within 10 business days of receiving the family's request and documentation verification if request for a larger unit is health-related.

PART II: UNIT OFFERS [24 CFR 1.4(b)(2)(ii); 24 CFR 960.208]

5-II.A. OVERVIEW

The GBHA must assign eligible applicants to dwelling units in accordance with a plan that is consistent with civil rights and nondiscrimination laws.

In filling an actual or expected vacancy, the GBHA must offer the dwelling unit to an applicant the appropriate offer sequence. The GBHA will offer the unit until it is accepted. This section describes the GBHA's policies with regard to the number of unit offers that will be made to applicants selected from the waiting list. This section also describes the GBHA's policies for offering units with accessibility features.

GBHA Policy

The GBHA will maintain a record of units offered and each acceptance, including location (address of the unit)~~,~~ and date, ~~and circumstances~~ of each offer., ~~each acceptance or~~ The GBHA will also maintain a record of each rejection, including the reason for the rejection (denial letter).

5-II.B. NUMBER OF OFFERS

GBHA Policy

If more than one unit of the same appropriate type and size is available, the the GBHA will offer the first unit that is ready for occupancy. If the vacant units will become ready for occupancy around the same time, then the GBHA will offer the eligible applicant both units and have the applicant choose the unit that will best fit the applicant due to location.

If one unit will become ready for occupancy before another unit with the same appropriate type and size, then GBHA will offer the first unit that is ready for occupancy. If the offer is rejected due to the applicant's current rental situation (locked in a one year lease), then GBHA will offer the applicant the next available unit that will become ready for occupancy at a later date. If the offer is rejected again due to the applicant's current rental situation (ready for occupancy date is earlier than applicant's one year lease date), then the GBHA will notify the applicant that his/her application will be closed and that he/she will have to submit a new application if he/she is still interested.

~~The GBHA has adopted a "two-to-three offer plan" for offering units to applicants. Under this plan, the GBHA will determine how many locations within its jurisdiction have available units of suitable size and type in the appropriate type of project. The number of unit offers will be based on the distribution of vacancies. If a suitable unit is available in:~~

~~Three (3) or more locations: The applicant will be offered a unit in the location with the highest number of vacancies. If the offer is rejected, the applicant will be offered a suitable unit in the location with the second highest number of vacancies. If that unit is rejected, a final offer will be made in the location with the third highest number of vacancies. The offers will be made in sequence and the applicant must refuse an offer before another is made.~~

~~Two (2) locations: The applicant will be offered a suitable unit in the location with the higher number of vacancies. If the offer is rejected, a final offer will be made at the other location. The offers will be made in sequence and the applicant must refuse the first offer before a second offer is made.~~

~~One (1) location: The applicant will be offered a suitable unit in that location. If the offer is rejected, the applicant will be offered the next suitable unit that becomes available, whether it is at the same location as the first offer or at another location. The second unit offer will be the final offer, unless there is good cause for refusing the offer.~~

~~If more than one unit of the appropriate type and size is available, the first unit to be offered will be the first unit that is ready for occupancy.~~

5-II.C. TIME LIMIT FOR UNIT OFFER ACCEPTANCE OR REFUSAL

GBHA Policy

The GBHA mails the offer letter to the last known address of the applicant and the offer letter states that the ~~Applicants~~ applicant must accept or refuse ~~a unit~~ the offer within ~~3~~ 10 business days ~~of~~ from the date of the ___ ~~unit~~ offer letter~~.~~ If the applicant accepts the offer then the applicant must also submit the full security deposit within the 10 business days.

5-II.D. REFUSALS OF UNIT OFFERS

An elderly or disabled family may decline an offer for designated housing. Such a refusal must not adversely affect the family's position on or placement on the public housing waiting list [24 CFR 945.303(d)].

GBHA Policy

Applicants may refuse to accept a unit offer for "good cause". Good cause includes situations in which an applicant family is willing to move but is unable to do so at the time of the unit offer, or the applicant family demonstrates that acceptance of the offer would cause undue hardship not related to considerations of the applicant's race, color, national origin, etc. Examples of good cause for refusal of a unit offer include:

- The family demonstrates to the GBHA's satisfaction that accepting the unit offer will require an adult household member to quit a job, drop out of an education institution or job training program, or take a child out of day care or an educational program;
- The family demonstrates to the GBHA's satisfaction that accepting the offer will place a family member's life, health, or safety in jeopardy. The family should offer specific and compelling documentation such as restraining orders, other court orders, or risk assessments related to witness protection from a law enforcement agency, or documentation of domestic violence, dating violence, sexual assault or stalking in accordance with section 16-VII.D of this ACOP. Reasons offered must be specific to the family. Refusals due to location alone do not qualify for this good cause exemption;
- A health professional verifies temporary hospitalization or recovery from illness of the principal household member, other household members, or line-in aide necessary to the care of the principal household member;
- The unit is inappropriate for the applicant's disabilities, or the family does not need the accessible features in the unit offered and does not want to be subject to the 30-day notice to move;
- The unit has lead-based paint and the family includes children under the age of six.

In the case of a unit refusal for good cause, the applicant family will ~~not~~ be removed from the waiting list and will be offered to apply again if they are still interested to remain on the waiting list for future offers. ~~as described previously. The applicant will remain at the top of the waiting list until the family receives an offer for which they do not have good cause to refuse.~~

~~The GBHA will require documentation of good cause for unit refusals.~~

Unit Refusal Without Good Cause

GBHA Policy
When an applicant rejects the final unit offer without good cause, the GBHA will remove the applicant's name from the waiting list and send notice to the family of such removal. The notice will inform the family of their right to request an informal hearing and the process for doing so (see Chapter 14).

The applicant may reapply for assistance if the waiting list is open. If the waiting list is not open, the applicant must wait to reapply until the GBHA opens the waiting list.

5-II.E. ACCESSIBLE UNITS [24 CFR 8.27]
The GBHA must adopt suitable means to assure that information regarding the availability of accessible units reaches eligible individuals with disabilities, and take reasonable nondiscriminatory steps to maximize the utilization of such units by eligible individuals whose disability requires the accessibility features of a particular unit.

When an accessible unit becomes vacant, before offering such units to a non-disabled applicant the GBHA must offer such units:

- First, to a current resident of another unit of the same development, or other public housing development under the GBHA's control, who has a disability that requires the special features of the vacant unit and is occupying a unit not having such features, or if no such occupancy exists, then
- Second, to an eligible qualified applicant on the waiting list having a disability that requires the special features of the vacant unit.

When offering an accessible unit to an applicant not having a disability requiring the accessibility features of the unit, the GBHA may require the applicant to agree (and may incorporate this agreement in the lease) to move to a non-accessible unit when available.

GBHA Policy

Families requiring an accessible unit may be over-housed in such a unit if there are no resident or applicant families of the appropriate size who also require the accessible features of the unit.

When there are no resident or applicant families requiring the accessible features of the unit, including families who would be over-housed, the GBHA will offer the unit to a non-disabled applicant.

When offering an accessible unit to a non-disabled applicant, the GBHA will require the applicant to agree to move to an available non-accessible unit within 30 days when either a current resident or an applicant needs the features of the unit and there is another unit available for the non-disabled family. This requirement will be a provision of the lease agreement.

5-II.F. DESIGNATED HOUSING

GBHA Policy

The GBHA ~~does not~~ currently ~~have~~ has a Designated Housing Plan for the Mason Manor Public Housing Program. Mason Manor has a designation plan approved by HUD to keep the population of the program with 85% elderly and/or disabled individuals only. The other 15% is approved for other individuals who are not elderly or disabled.

Report to the
Housing Authority
of the City of Green Bay

MEETING DATE	PREPARED BY
October 17, 2019	Jayme Valentine, Staff

AGENDA ITEM # D.4.

Consideration with possible action to amend Chapter 6 - (Income and rent Determinations) of the Admissions and Continued Occupancy Plan.

BACKGROUND

New updates were announced by the Department of Housing and Urban Development which the Green Bay Housing Authority is requesting to adopt.

Key changes include updates to the web addresses and Public and Indian Housing Notice numbers.

RECOMMENDATION

Staff is recommending approval to amend Chapter 6 - (Income and rent Determinations) of the Admissions and Continued Occupancy Plan.

FISCAL IMPACT

ATTACHMENTS

1. Chapter 6- Income&Rent Determinations

Chapter 6

INCOME AND RENT DETERMINATIONS

[24 CFR Part 5, Subparts E and F; 24 CFR 960, Subpart C]

INTRODUCTION
A family's annual income is used to determine their income eligibility for the public housing program and is also used to calculate the amount of the family's rent payment. The GBHA will use the policies and methods described in this chapter to ensure that only income-eligible families receive assistance and that no family pays more or less rent that is required under the regulations. This chapter describes HUD regulations and GBHA policies related to these topics in three parts as follows:

> Part I: Annual Income. HUD regulations specify the sources of income to include and exclude to arrive at a family's annual income. These requirements and GBHA policies for calculating annual income are found in this part.
>
> Part II: Adjusted Income. Once annual income has been established, HUD regulations required the GBHA to subtract from annual income any of five mandatory deductions for which a family qualifies. These requirements and GBHA policies for calculating adjusted income are found in this part.
>
> Part III: Calculating Rent. This part describes the statutory formula for calculating total tenant payment (TTP), the use of utility allowances, and the methodology for determining family rent payment. Also included here are flat rents and the family's choice in rents.

PART I: ANNUAL INCOME

6-I.A. OVERVIEW
The general regulatory definition of annual income shown below is from 24 CFR 5.609:

> 24 C*FR 5.609 Annual Income.*
> *(a) Annual income means all amounts, monetary or not, which:*
> *(1) Go to, or on behalf of, the family head or spouse or to any other family member, or;*
> *(2) Are anticipated to be received from a source outside the family during the 12-month period following admission or annual re-examination effective date; and*
> *(3) Which are not specifically excluded in paragraph [5.609(c)]*
> *(4) Annual income also means amounts derived from assets to which any member of the family has access.*

In addition to this general definition, HUD regulations establish policies for treating specific types of income and assets. The full texts of those portions of the regulations are provided in exhibits at the end of this chapter as follows:

- Annual Income Inclusions (Exhibit 6-1)
- Annual Income Exclusions (Exhibit 6-2)
- Treatment of Family Assets (Exhibit 6-3)
- Earned Income Disallowance (Exhibit 6-4)
- The Effect of Welfare Benefit Reduction (Exhibit 6-5)

Sections 6-I.B. and 6-I.C discuss general requirements and methods for calculating annual income. The rest of this section describes how each source of income is treated for the purposes of determining annual income. HUD regulations present income inclusions and exclusions separately [24 CFR 5.609(b) and 24 CFR 5.609(c)]. In this ACOP, however, the discussions of income inclusions and exclusions are integrated by topic (e.g. all policies affecting earned income are discussed together in section 6-I.D). Verification requirements for annual income are discussed in Chapter 7.

6-I.B. HOUSEHOLD COMPOSITION AND INCOME
Income received by all family members must be counted unless specifically excluded by the regulations. It is the responsibility of the head of household to report changes in family composition. The rules on which sources of income are counted vary somewhat by family member. The chart below summarizes how family composition affects income determinations.

Summary of Income Included and Excluded by Person	
Live-In Aides	Income from all sources excluded [24 CFR 5.609(c)(5)].
Foster Child or Foster Adult	Income from all sources excluded [24 CFR 5.609(a)(1)].
Head, Spouse, or Co-Head Other Adult Family Members	All sources of income not specifically excluded by the regulations are included
Children Under 18 Years of Age (this does not include head, spouse, or co-head)	Employment income is excluded [24 CFR 5.609 (c)(1)]. All other sources of income, except those specifically excluded by the regulations, are included
Full-Time Students 18 Years of Age or Older (never head, spouse, or co-head)	Employment income above $480/year is excluded [24 CFR 5.609(c)(11)]. All other sources of income, except those specifically excluded by the regulations, are included

Temporarily Absent Family Members
The income of family members approved to live in the unit will be counted, even if the family member is temporarily absent from the unit [HCV GB, p.5-18]..

> <u>GBHA Policy</u>
> Generally, an individual who is or is expected to be absent from the assisted unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family member. Generally, an individual who is or is expected to be absent from the assisted unit for more than 180 consecutive days is considered permanently absent and no longer a family member. There are exceptions to this general policy.

Absent Students

> <u>GBHA Policy</u>
> When someone who has been considered a family member attends school away from home, the person will continue to be considered a family member unless information becomes available to the GBHA indicating that the student has established a separate household or the family declares that the student has established a separate household.

Absent Due to Placement in Foster Care
Children temporarily absent from the home as a result of placement in foster care are considered members of the family [24 CFR 5.403].

GBHA Policy
If the child has been placed in foster care, the GBHA will verify with the appropriate agency whether and when the child is expected to be returned to the home. Unless the agency confirms that the child has been permanently removed from the home, the child will be counted as a family member.

Absent Head, Spouse, or Co-Head

GBHA Policy
An employed head, spouse, or co-head absent from the unit more than 180 consecutive days due to employment will continue to be considered a family member.

Individuals Confined for Medical Reasons

GBHA Policy
An individual confined to a nursing home or hospital on a permanent basis is not considered a family member.

If there is a question about the status of a family member, the GBHA will request verification from a responsible medical professional and will use this determination. If the responsible medical professional cannot provide a determination, the person generally will be considered temporarily absent. The family may present evidence that the family member is confined on a permanent basis and request that the person not be considered a family member. If the verification indicates that the family member will return in less than 180 consecutive days, the family member will not be considered permanently absent.

Joint Custody of Children

GBHA Policy
Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or resident family 50 percent or more of the time.

When more than one applicant or assisted family (regardless of the program) are claiming the same dependents as family members, the family with primary custody at the time of the initial examination or re-examination will be able to claim the dependents. If there is a dispute about which family should claim them, the GBHA will make the determination based on available documents such as court orders, an IRS income tax return showing which family has claimed the child for income tax purposes, school records, or other credible documentation.

Caretakers for a Child

GBHA Policy
The approval of a caretaker is at the GBHA's discretion and subject to the GBHA's screening criteria. If neither a parent nor a designated guardian remains in a household, the GBHA will take the following actions.

If a responsible agency has determined that another adult is to be brought into the unit to care for a child for an indefinite period, the designated caretaker will not be considered a family member until a determination of custody or legal guardianship is made.

If a caretaker has assumed responsibility for a child without the involvement of a responsible agency or formal assignment of custody or legal guardianship, the caretaker will be treated as a visitor for 90 days. After the 90 days has elapsed, the caretaker will be considered a family member unless information is provided that would confirm that the caretaker's role is temporary. In such cases, the GBHA will extend the caretaker's status as an eligible visitor.

At any time that custody or guardianship legally has been awarded to a caretaker, the lease will be transferred to the caretaker, as head of household.

During any period that a caretaker is considered a visitor, the income of the caretaker is not counted in annual income and the caretaker does not qualify the family for any deductions from income.

6-I.C. ANTICIPATING ANNUAL INCOME
The GBHA is required to count all income "anticipated to be received from a source outside the family during the 12-month period following admission or annual re-examination effective date" [24 CFR 5.609(a)(2)]. Policies related to anticipating annual income are provided below.

Basis of Annual Income Projection
The GBHA generally will use current circumstances to determine anticipated income for the coming 12-month period. HUD authorizes the GBHA to use other than current circumstances to anticipate income when:

- An imminent change in circumstances is expected [HCV GB, p.5-17]
- It is not feasible to anticipate a level of income over a 12-month period (e.g. seasons or cyclic income) [24 CFR 5.609(d)]
- The GBHA believes that past income is the best available indicator of expected future income [24 CFR 5.609(d)]

The GBHA is required to use HUD's Enterprise Income Verification (EIV) system in its entirety as a third party source to verify employment and income information, and to reduce administrative subsidy payment errors in accordance with HUD administrative guidance [24 CFR 5.233(a)(2)].

HUD allows the GBHA to use tenant-provided documents to project income once EIV data has been received in such cases where the family does not dispute the EIV employer data and where the GBHA does not determine it is necessary to obtain additional third-party data.

<u>GBHA Policy</u>
When EIV is obtained and the family does not dispute the EIV employer data, the GBHA will use current tenant-provided documents to project annual income. When the tenant-provided documents are pay stubs, the GBHA will make every effort to obtain current and consecutive pay stubs dated within the last 60 days.

The GBHA will obtain written and/or oral third-party verification in accordance with the verification requirements and policy in Chapter 7 in the following cases:

If EIV or other UIV data is not available,

If the family disputes the accuracy of the EIV employer data, and/or
If the GBHA determines additional information is needed.

In such cases, the GBHA will review and analyze current data to anticipate annual income. In all cases, the family file will be documented with a clear record of the reason for the decision, and a clear audit trail will be left as to how the GBHA annualized projected income.

When the GBHA cannot readily anticipate income based upon current circumstances (e.g., in the case of seasonal employment, unstable working hours, or suspected fraud), the GBHA will review and analyze historical data for patterns of employment, paid benefits, and receipt of other income and use the results of this analysis to establish annual income.

Any time current circumstances are not used to project annual income, a clear rationale for the decision will be documented in the file. In all such cases the family may present information and documentation to the GBHA to show why the historic pattern does not represent the family's anticipated income.

Known Changes in Income
If the GBHA verifies an upcoming increase or decrease in income, annual income will be calculated by applying each income amount to the appropriate part of the 12-month period.

Example: An employer reports that a full-time employee who has been receiving \$8/hour will begin to receive \$8.25/hour in the eighth week after the effective date of the re-examination. In such a case the GBHA would calculate annual income as follow: (\$8/hour x 40 hours x 7 weeks) + (\$8.25 x 40 hours x 45 weeks).

The family may present information that demonstrates that implementing a change before its effective date would create a hardship for the family. In such cases, the GBHA will calculate annual income using current circumstances and then require an interim re-examination when the change actually occurs. This requirement will be imposed even if the GBHA's policy on re-examinations does not require interim re-examinations for other types of changes.

When tenant-provided third-party documents are used to anticipate annual income, they will be dated within the last 60 days of the re-examination interview date.

6-I.D. EARNED INCOME [24 CFR 5.609(b) and (c)]

Types of Earned Income Included in Annual Income

Wages and Related Compensation [24 CFR 5.609(b)(1)]
The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services is included in annual income.

<u>GBHA Policy</u>
For persons who regularly receive bonuses or commissions, the GBHA will verify and then average amounts received for the two years preceding admission or re-examination. If only a one-year history is available, the GBHA will use the prior year amounts. In either case the family may provide, and the GBHA will consider, a credible justification for not using this history to

anticipate future bonuses or commissions. If a new employee has not yet received any bonuses or commissions, the GBHA will count only the amount estimated by the employer. The file will be documented appropriately.

Some Types of Military Pay
All regular pay, special pay, and allowances of a member of the Armed Forces are counted [24 CFR 5.609(b)(8)] except for the special pay to a family member serving in the Armed Forces who is exposed to hostile fire [24 CFR 5.609(c)(7)].

Types of Earned Income Not Counted in Annual Income

Temporary, Nonrecurring, or Sporadic Income [24 CFR 5.609(c)(9)]
This type of income (including gifts) is not included in annual income.

GBHA Policy
Sporadic income is income that is received periodically and cannot be reliably predicted. The GBHA defines periodically as three occurrences or less per year or less than $2,000 earned annually. For example, the income of an individual who works occasionally as a handyman would be considered sporadic if future work could not be anticipated and no historic, stable pattern of income existed.

Children's Earnings [24 CFR 5.609(c)(1)]
Employment income earned by children (including foster children) under the age of 18 years is not included in annual income. (See eligibility chapter for a definition of foster children.)

Certain Earned Income of Full-Time Students
Earnings in excess of $480 for each full-time student 18 years old or older (except for the head, spouse, or co-head) are not counted [24 CFR 5.609(c)(11)]. To be considered "full-time", a student must be considered "full-time" by an educational institution with a degree or certificate program [HCV GB, p.5-29].

Income of a Live-In Aide
Income earned by a live-in aide, as defined in [24 CFR 5.403], is not included in annual income [24 CFR 5.609(c)(5)]. (See eligibility chapter for a full discussion of live-in aides.)

Income Earned Under Certain Federal Programs [24 CFR 5.609(c)(17)]
Income from some federal programs is specifically excluded from consideration as income, including:

- Payments to volunteers under the Domestic Volunteer Services Act of 1973 (42 U.S.C. 5044(g), 5058)
- Awards under the federal work-study program (20 U.S.C. 1087 uu)
- Payments received from programs funded under Title V of the Older Americans Act of 1985 (42 U.S.C. 3056(f))
- Allowances, earnings, and payments to AmeriCorps participants under the National and Community Service Act of 1990 (42 U.S.C. 12637(d))
- Allowances, earnings, and payments to participants in programs funded under the Workforce Investment Act of 1998 (29 U.S.C. 2931)

Resident Service Stipend [24 CFR 5.600(c)(8)(iv)]
Amounts received under a resident service stipend are not included in annual income. A resident service stipend is a modest amount (not to exceed $200 per individual per month) received by a resident for performing a service for the GBHA, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the GBHA's governing board. No resident may receive more than one such stipend during the same period of time.

State and Local Employment Training Program
Incremental earnings and benefits to any family member resulting from participation in qualifying state or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff are excluded from annual income. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives are excluded only for the period during which the family member participates in the training program [24 CFR 5.609(c)(8)(v)].

> GBHA Policy
> The GBHA defines *training program* as "a learning process with goals and objectives, generally having a variety of components, and taking place in a series of sessions over a period of time. It is designed to lead to a higher level of proficiency, and it enhances the individual's ability to obtain employment. It may have performance standards to measure proficiency. Training may include, but is not limited to: (1) classroom training in a specific occupational skill, (2) on-the-job training with wages subsidized by the program, or (3) basic education" [expired Notice PIH 98-2, p.3].
>
> The GBHA defines *incremental earnings and benefits* as the difference between (1) the total amount of welfare assistance and earnings of a family member prior to enrollment in a training program and (2) the total amount of welfare assistance and earnings of the family member after enrollment in the program [expired Notice PIH 98-2, pp.3-4].
>
> In calculating the incremental difference, the GBHA will use as the pre-enrollment income the total annualized amount of the family member's welfare assistance and earnings reported on the family's most recently completed HUD-50058.
>
> End of participation in a training program must be reported in accordance with the GBHA's interim reporting requirements (see chapter on re-examinations).

HUD-Funded Training Programs
Amounts received under training programs funded in whole or in part by HUD [24 CFR 5.609(c)(8)(i)] are excluded from annual income. Eligible sources of funding for the training include operating subsidy, Section 8 administrative fees, and modernization, Community Development Block Grant (CDBG), HOME program, and other grant funds received from HUD.

> GBHA Policy
> To qualify as a training program, the program must meet the definition of *training program* provided above for state and local employment training programs.

Earned Income Tax Credit. Earned income tax credit (EITC) refund payments received on or after January 1, 1991 (26 U.S.C. 32(j)), are excluded from annual income [24 CFR 5.609(c)(17)]. Although many families receive the EITC annually when they file taxes, an EITC can also be received throughout the year. The prorated share of the annual EITC is included in the employee's payroll check.

Earned Income Disallowance. The earned income disallowance is discussed in section 6-I.E below.

6-I.E. EARNED INCOME DISALLOWANCE [24 CFR 960.255; Streamlining Final Rule (SFR) Federal Register 3/8/16]

The earned income disallowance (EID) encourages people to enter the work force by not including the full value of increases in earned income for a period of time. The full text of 24 CFR 960.255 is included as Exhibit 6-4 at the end of this chapter. Eligibility criteria and limitations on the disallowance are summarized below.

Eligibility
This disallowance applies only to individuals in families already participating in the public housing program (not at initial examination). To qualify, the family must experience an increase in annual income that is the result of one of the following events:

- Employment of a family member who was previously unemployed for one or more years prior to employment. *Previously employed* includes a person who annually has earned not more than the minimum wage applicable to the community multiplied by 500 hours. The applicable minimum wage is the federal minimum wage unless there is a higher state or local minimum wage.
- Increased earnings by a family member whose earnings increase during participation in an economic self-sufficiency or job-training program. A self-sufficiency program includes a program designed to encourage, assist, train, or facilitate the economic independence of HUD-assisted families or to provide work to such families [24 CFR 5.603(b)].
- New employment or increased earnings by a family member who has received benefits or services under Temporary Assistance for Needy Families (TANF) or any other state program funded under Title IV of the Social Security Act within the past six months. If the benefits are received in the form of monthly maintenance, there is no minimum amount. If the benefits or services are received in a form other than monthly maintenance, such as one-time payments, wage subsidies, or transportation assistance, the total amount received over the six-month period must be at least $500.

Calculation of the Disallowance
Calculation of the earned income disallowance for an eligible member of a qualified family begins with a comparison of the member's current income with his or her "prior income."

> GBHA Policy
> The GBHA defines prior income, or prequalifying income, as the family member's last certified income prior to qualifying for the EID.

The family member's prior, or prequalifying, income remains constant (as a baseline) throughout the period that he or she is participating in the EID.

Initial 12-Month Exclusion
During the initial 12-month exclusion period, the full amount (100 percent) of any increase in income attributable to new employment or increased earnings is excluded. The 12 months are cumulative and need not be consecutive.

GBHA Policy

The initial EID exclusion period will begin on the first of the month following the date an eligible member of a qualified family is first employed or first experiences an increase in earnings.

Second 12-Month Exclusion and Phase-In

During the second 12-month exclusion period, the exclusion is reduced to half (50 percent) of any increase in income attributable to employment or increased earnings. The 12 months are cumulative and need not be consecutive.

Lifetime Limitation

The EID has a four-year (48-month) lifetime maximum. The four-year eligibility period begins at the same time that the initial exclusion period begins and ends 48 months later. The one-time eligibility for the EID applies even if the eligible individual begins to receive assistance from another housing agency, if the individual moves between public housing and Section 8 assistance, or if there are breaks in assistance.

GBHA Policy

During the 48-month eligibility period, the GBHA will conduct an interim re-examination each time there is a change in the family member's annual income that affects or is affected by the EID (e.g. when the family member's income falls to a level at or below his/her prequalifying income, when one of the exclusion periods ends, and at the end of the lifetime maximum eligibility period).

Individual Savings Accounts [24 CFR 960.255(d)]

GBHA Policy

The GBHA chooses not to establish a system of individual savings accounts (ISAs) for families who qualify for the EID.

6-I.F. BUSINESS INCOME [24 CFR 5.609(b)(2)]

Annual income includes "the net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in IRS regulations. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation of the family" [24 CFR 5.609(b)(2)].

Business Expenses

Net income is "gross income less business expense" [HCV GB, p. 5-19].

GBHA Policy

To determine business expenses that may be deducted from gross income, the GBHA will use current applicable Internal Revenue Service (IRS) rules for determining allowable business expenses [see IRS Publication 535], unless a topic is addressed by HUD regulations or guidance as described below.

Business Expansion

HUD regulations do not permit the GBHA to deduct from gross income expenses for business expansion.

GBHA Policy

Business expansion is defined as any capital expenditures made to add new business activities, to expand current facilities, or to operate the business in additional locations. For example, purchase of a street sweeper by a construction business for the purpose of adding street cleaning to the services offered by the business would be considered a business expansion. Similarly, the purchase of a property by a hair care business to open at a second location would be considered a business expansion.

Capital Indebtedness

HUD regulations do not permit the GBHA to deduct from gross income the amortization of capital indebtedness.

GBHA Policy

Capital indebtedness is defined as the principal portion of the payment on a capital asset such as land, buildings, and machinery. This means the GBHA will allow as a business expense interest, but not principal, paid on capital indebtedness.

Negative Business Income

If the net income from a business is negative, no business income will be included in annual income; a negative amount will not be used to offset other family income.

Withdrawal of Cash or Assets from a Business

HUD regulations require the GBHA to include in annual income the withdrawal of cash or assets from the operation of a business or profession unless the withdrawal reimburses a family member for cash or assets invested in the business by the family.

GBHA Policy

Acceptable investments in a business include cash loans and contributions of assets or equipment. For example, if a member of a tenant family provided an up-front loan of $2,000 to help a business get started, the GBHA will not count as income any withdrawals from the business up to the amount of this loan until the loan has been repaid. Investments do not include the value of labor contributed to the business without compensation.

Co-Owned Businesses

GBHA Policy

If a business is co-owned with someone outside the family, the family must document the share of the business it owns. If the family's share of the income is lower than its share of ownership, the family must document the reasons for the difference.

6-I.G. ASSETS [24 CFR 5.609(b)(3) and 24 CFR 5.603(b)]

Overview

There is no asset limitation for participation in the public housing program. However, HUD requires that the GBHA include as annual income the anticipated "interest, dividends, and other net income of any kind from real or personal property". This section discusses how the income from various types of assets is determined. For most types of assets, the GBHA must determine the value of the asset in order to computer income from the asset. Therefore, for each asset type, this section discusses:

- How the value of the asset will be determined
- How income from the asset will be calculated.

Exhibit 6-1 provides the regulatory requirements for calculating income from assets [24 CFR 5.609(b)(3)], and Exhibit 6-3 provides the regulatory definition of net family assets. This section begins with a discussion of general policies related to assets and then provides HUD rules and GBHA policies related to each type of asset.

General Policies

Income from Assets

The GBHA generally will use current circumstances to determine both the value of an asset and the anticipated income from the asset. As is true for all sources of income, HUD authorizes the GBHA to use other than current circumstances to anticipate income when (1) an imminent change in circumstances is expected, (2) it is not feasible to anticipate a level of income over 12 months, or (3) the GBHA believes that past income is the best indicator of anticipated income. For example, if a family member owns real property that typically receives rental income but the property is currently vacant, the GBHA can take into consideration past rental income along with the prospects of obtaining a new tenant.

> GBHA Policy
> Anytime current circumstances are not used to determine asset income, a clear rationale for the decision will be documented in the file. In such cases, the family may present information and documentation to the GBHA to show why the asset income determination does not represent the family's anticipated asset income.

Valuing Assets

The calculation of asset income sometimes requires the GBHA to make a distinction between an asset's market value and its cash value.

- The market value of an asset is its worth in the market (e.g. the amount a buyer would pay for real estate or the total value of an investment account).
- The cash value of an asset is its market value less all reasonable amounts that would be incurred when converting the asset to cash.

> GBHA Policy
> Reasonable costs that would be incurred when disposing of an asset include, but are not limited to, penalties for premature withdrawal, broker and legal fees, and settlement costs incurred in real estate transactions [HCV GB, P. 5-28 and PH Occ GB, p.121].

Lump-Sum Receipts

Payments that are received in a single lump sum, such as inheritances, capital gains, lottery winnings, insurance settlements, and proceeds from the sale of property, are generally considered assets, not income. However, such lump-sum receipts are counted as assets only if they are retained by a family in a form recognizable as an asset (e.g. deposited in a savings or checking account) [RHIIP FAQS]. (For a discussion of lump-sum payments that represent the delayed start of a periodic payment, most of which are counted as income, see sections 6-I.H and 6-I.I.)

Imputing Income from Assets[24 CFR 5.609(b)(3), Notice PIH 2012-29]
When net family assets are $5,000 or less, the GBHA will include in annual income the actual income anticipated to be derived from the assets. When the family has net family assets in excess of $5,000, the GBHA will include in annual income the greater of the actual income derived from the assets or the imputed income. Imputed income from assets is calculated by multiplying the total cash value of all family assets by an average passbook savings rate as determined by the GBHA.

- Note: The HUD field office no longer provides an interest rate for imputed asset income. The "safe harbor" is now the GBHA to establish a passbook rate within 0.75 percent of a national average.
- The GBHA must review its passbook rate annually to ensure that it remains within 0.75 percent of the national average.

GBHA Policy
The GBHA will set the imputed asset passbook rate at zero percent.

Determining Actual Anticipated Income from Assets
It may or may not be necessary for the GBHA to use the value of an asset to compute the actual anticipated income from the asset. When the value is required to compute the anticipated income from an asset, the market value of the asset is used. For example, if the asset is a property for which a family receives rental income, the anticipated income is determined by annualizing the actual monthly rental amount received for the property; it is not based on the property's market value. However, if the asset is a savings account, the anticipated income is determined by multiplying the market value of the account by the interest rate on the account.

Withdrawal of Cash or Liquidation of Investments
Any withdrawal of cash or assets from an investment will be included in income except to the extent that the withdrawal reimburses amounts invested by the family. For example, when a family member retires, the amount received by the family from a retirement investment plan is not counted as income until the family has received payments equal to the amount the family member deposited into the retirement investment plan.

Jointly Owned Assets
The regulation at 24 CFR 5.609(a)(4) specifies that annual income includes "amounts derived (during the 12-month period) from assets to which any member of the family has access."

GBHA Policy
If an asset is owned by more than one person and any family member as unrestricted access to the asset, the GBHA will count the full value of the asset. A family member has unrestricted access to an asset when he or she can legally dispose of the asset without the consent of any of the other owners.

If an asset is owned by more than one person, including a family member, but the family member does not have unrestricted access to the asset, the GBHA will prorate the asset according to the percentage of ownership. If no percentage is specified or provided for by state or local law, the GBHA will prorate the asset evenly among all owners.

Assets Disposed of for Less than Fair Market Value [24 CFR 5.603(b)]
HUD regulations require the GBHA to count as a current asset any business or family asset that was disposed of for less than fair market value during the two years prior to the effective date of the examination or re-examination, except as noted below.

Minimum Threshold
The GBHA may set a threshold [below] which assets disposed of for less than fair market value will not be counted [HCV GB, p.5-27].

> <u>GBHA Policy</u>
> The GBHA will not include the value of assets disposed of for less than fair market value unless the cumulative fair market value of all assets disposed of during the past two years exceeds the gross amount received for the assets by more than $1,000.
>
> When the two-year period expires, the income assigned to the disposed asset(s) also expires. If the two-year period ends between annual re-certifications, the family may request an interim re-certification to eliminate consideration of the asset(s).
>
> Assets placed by the family in nonrevocable trusts are considered assets disposed of for less than fair market value except when the assets placed in trusts were received through settlements for judgments.

Separation or Divorce
The regulation also specifies that assets are not considered disposed of for less than fair market value if they are disposed of as part of a separation or divorce settlement and the applicant or tenant receives important consideration not measurable in dollar terms.

> <u>GBHA Policy</u>
> All assets disposed of as part of a separation or divorce settlement will be considered assets for which important consideration not measurable in monetary terms has been received. In order to qualify for this exemption, a family member must be subject to a formal separation or divorce settlement agreement established through arbitration, mediation, or court order.

Foreclosure or Bankruptcy
Assets are not considered disposed of for less than fair market value when the disposition is the result of a foreclosure or bankruptcy sale.

Family Declaration

> <u>GBHA Policy</u>
> Families must sign a declaration form at initial certification and each annual re-certification identifying all assets that have been disposed of for less than fair market value or declaring that no assets have been disposed of for less than fair market value. The GBHA may verify the value of the assets disposed of if other information available to the GBHA does not appear to agree with the information reported by the family.

Types of Assets

Checking and Savings Accounts
For regular checking accounts and savings accounts, cash value has the same meaning as market value. If a checking account does not bear interest, the anticipated income from the account is zero.

> <u>GBHA Policy</u>
> In determining the value of a checking account, the GBHA will use the monthly balance for the current or most recent month available. The first $500 in a checking account or a savings account, but not a combination of the two, will be disregarded in calculating an asset.
>
> In determining the value of a savings account, the GBHA will use the current balance.
>
> In determining the anticipated income from an interest-bearing checking or savings account, the GBHA will multiply the value of the account by the current rate of interest paid on the account.

Investment Accounts Such as Stocks, Bonds, Saving Certificates, and Money Market Funds
Interest or dividends earned by investment accounts are counted as actual income from assets even when the earnings are reinvested. The cash value of such an asset is determined by deducting from the market value any broker fees, penalties for early withdrawal, or other costs of converting the asset to cash.

> <u>GBHA Policy</u>
> In determining the market value of an investment account, the GBHA will use the value of the account on the most recent investment report.
>
> How anticipated income from an investment account will be calculated depends on whether the rate of return is known. For assets that are held in an investment account with a known rate of return (e.g. savings certificates), asset income will be calculated based on that known rate (market value multiplied by rate of earnings). When the anticipated rate of return is not known (e.g. stocks), the GBHA will calculate asset income based on the earnings for the most recent reporting period.

Equity in Real Property or Other Capital Investments
Equity (cash value) in a property or other capital asset is the estimated current market value of the asset less the unpaid balance on all loans secured by the asset and reasonable costs that would be incurred in selling the asset [HCV GB, p.5-25 and PH, p.121].

Equity in real property and other capital investments is considered in the calculation of asset income except for the following types of assets:

- Equity accounts in HUD homeownership programs [24 CFR 5.603(b)]
- Equity in real property when a family member's main occupation is real estate [HCV GB, p. 5-25]. This real estate is considered a business asset, and income related to this asset will be calculated as described in section 6-I.F.
- Interests in Indian Trust lands [24 CFR 5.603(b)]
- Real property and capital assets that are part of an active business or farming operation [HCV GB, p.5-25]

A family may have real property as an asset in two ways: (1) owning the property itself, and (2) holding a mortgage or deed of trust on the property. In the case of a property owned by a family member, the anticipated asset income generally will be in the form of rent or other payment for the use of the property. If the property generates no income, actual anticipated income from the asset will be zero.

In the case of a mortgage or deed of trust held by a family member, the outstanding balance (unpaid principal) is the cash value of the asset. The interest portion only of payments made to the family in accordance with the terms of the mortgage or deed of trust is counted as anticipated asset income.

> GBHA Policy
> In the case of capital investments owned jointly with others not living in a family's unit, a prorated share of the property's cash value will be counted as an asset unless the GBHA determines that the family receives no income from the property and is unable to sell or otherwise convert the asset to cash.

Trusts
A trust is a legal arrangement generally regulated by state law in which one party (the creator or grantor) transfers property to a second party (the trustee) who holds the property for the benefit of one or more third parties (the beneficiaries).

Revocable Trusts
If any member of a family has the right to withdraw the funds in a trust, the value of the trust is considered an asset [HCV GB, p.5-25]. Any income earned as a result of investment of trust funds is counted as actual asset income, whether the income is paid to the family or deposited in the trust.

Nonrevocable Trusts
In cases where a trust is not revocable by, or under the control of, any member of a family, the value of the trust fund is not considered an asset. However, any income distributed to the family from such a trust is counted as a periodic payment or a lump-sum receipt, as appropriate [24 CFR 5.603(b)]. (Periodic payments are covered in section 6-I.H. Lump-sum receipts are discussed earlier in this section.)

Retirement Accounts

Company Retirement/Pension Accounts
In order to correctly include or exclude as an asset any amount held in a company retirement or pension account by an employed person, the GBHA must know whether the money is accessible before retirement [HCV GB, p.5-26].

While a family member is employed, only the amount the family member can withdraw without retiring or terminating employment is counted as an asset [HCV GB, p. 5-26].

After a family member retires or terminates employment, any amount distributed to the family member is counted as a periodic payment or a lump-sum receipt, as appropriate [HCV GB, p.5-26], except to the extent that it represents funds invested in the account by the family member. (For more on periodic payments, see section 6-I.H.) The balance in the account is counted as an asset only if it remains accessible to the family member.

IRA, Keogh, and Similar Retirement Savings Accounts
IRA, Keogh, and similar retirement savings accounts are counted as assets even though early withdrawal would result in a penalty [HCV GB, p.5-25].

Personal Property
Person property held as an investment, such as gems, jewelry, coin collections, antique cars, etc., is considered an asset [HCV GB, p.5-25].

> <u>GBHA Policy</u>
> In determining the value of personal property held as an investment, the GBHA will use the family's estimate of the value. However, the GBHA also may obtain an appraisal if appropriate to confirm the value of the asset. The family must cooperate with the appraiser but cannot be charged any costs related to the appraisal.
>
> Generally, personal property held as an investment generates no income until it is disposed of. If regular income is generated, the amount that is expected to be earned in the coming year is counted as actual income from the asset.

Necessary personal property are not considered assets [24 CFR 5.603(b)].

> <u>GBHA Policy</u>
> Necessary personal property consists of items such as clothing, furniture, household furnishings, jewelry that is not held as an investment, and vehicles, including those specially equipped for persons with disabilities.

Life Insurance
The cash value of a life insurance policy available to a family member before death, such as a whole life or universal life policy is included in the calculation of the value of the family's assets [HCV GB 5-25]. The cash value is the surrender value. If such a policy earns dividends or interest that the family could elect to receive, the anticipated amount of dividends or interest is counted as income from the asset whether or not the family actually receives it.

6-I.H. PERIODIC PAYMENTS
Periodic payments are forms of income received on a regular basis. HUD regulations specify periodic payments that are and are not included in income.

Periodic Payments <u>Included</u> in Annual Income
- Periodic payments from sources such as <u>social security, unemployment and welfare assistance, annuities, insurance policies, retirement funds, and pensions.</u> However, periodic payments from retirement accounts, annuities, and similar forms of investments are counted only after they exceed the amount contributed by the family [24 CFR 5.609(b)(4) and (b)(3)].
- <u>Disability or death benefits and lottery receipts</u> paid periodically, rather than in a single lump sum [24 CFR 5.609(b)(4) and HCV , p.5-14].

Lump-Sum Payments for the Delayed Start of a Periodic Payment
Most lump sums received as a result of delays in processing periodic payments, such as unemployment or welfare assistance, are counted as income. However, lump-sum receipts for the delayed start of periodic social security or supplemental security income payments are not counted as income [24 CFR 5.609(b)(4)]. Additionally, any deferred disability benefits that are received in a lump sum or in prospective monthly amounts from the Department of Veterans Affairs are to be excluded from annual income [FR Notice 11/24/08].

GBHA Policy
When a delayed-start payment is received and reported during the period in which the GBHA is processing an annual re-examination, the GBHA will adjust the tenant rent retroactively for the period the payment was intended to cover. The family may pay in full any amount due or request to enter into a repayment agreement with the GBHA.

See the chapter on re-examinations for information about a family's obligation to report lump-sum receipts between annual re-examinations.

Periodic Payments Excluded from Annual Income

- Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the tenant family, who are unable to live alone) [24 CFR 5.609(c)(2)]. Kinship care payments are considered equivalent to foster care payments and are also excluded from annual income [Notice PIH 2008-40].
  GBHA Policy
  The GBHA will exclude payments for the care of foster children and foster adults only if the care is provided through an official arrangement with a local welfare agency [HCV GB, p. 5-18]

- Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home [24 CFR 5.609(c)(16)]

- Amounts received under the low-income home energy assistance program (42 U.S.C. 1626(c)) [24 CFR 5.609(c)(17)]

- Amounts received under the Child Care and Developmental Block Grant Act of 1990 (42 U.S.C. 9858q) [24 CFR 5.609 (c)(17)]

- Earned income tax credit (EITC) refund payments (26 U.S.C. 32(j)) [24 CFR 5.609(c)(17)]. *Note*: EITC may be paid periodically if the family elects to receive the amount due as part of payroll payments from an employer.

- Lump sums received as a result of delays in processing social security and SSI payments (see section 6-I.J.) [24 CFR 5.609(b)(4)].

6-I.I. PAYMENTS IN LIEU OF EARNINGS

Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation, and severance pay, are counted as income [24 CFR 5.609(b)(5)] if they are received either in the form of periodic payments or in the form of a lump-sum amount or prospective monthly amounts for the delayed start of a periodic payment. If they are received in a one-time lump sum (as a settlement for instance), they are treated as lump-sum receipts [24 CFR 5.609(c)(3)]. (See also the discussion of periodic payments in section 6-I.H and the discussion of lump-sum receipts in Section 6-I.G.)

6-I.J. WELFARE ASSISTANCE

Overview

Welfare assistance is counted in annual income. Welfare assistance includes Temporary Assistance for Needy Families (TANF) and any payments to individuals or families based on need that are made under programs funded separately or jointly by federal, state, or local governments [24 CFR 5.603(b)].

Sanctions Resulting in the Reduction of Welfare Benefits [24 CFR 5.615]
The GBHA must make a special calculation of annual income when the welfare agency imposes certain sanctions on certain families. The full text of the regulation at 24 CFR 5.615 is provided as Exhibit 6-5. The requirements are summarized below. This rule applies only if a family was a public housing resident at the time the sanction was imposed.

Covered Families
The families covered by 24 CFR 5.615 are those "who received welfare assistance or other public assistance benefits ('welfare benefits') from a state or other public agency ('welfare agency') under a program for which federal, state, or local law requires that a member of the family must participate in an economic self-sufficiency program as a condition for such assistance" [24 CFR 5.615(b)].

Imputed Income
When a welfare agency imposes a sanction that reduces a family's welfare income because the family commits fraud or fails to comply with the agency's economic self-sufficiency program or work activities requirement, the GBHA must include in annual income "imputed" welfare income. The GBHA must request that the welfare agency provide the reason for the reduction of benefits and the amount of the reduction of benefits. The imputed welfare income is the amount that the benefits were reduced as a result of the sanction.

This requirement does not apply to reductions in welfare benefits: (1) at the expiration of the lifetime or other time limit on the payment of welfare benefits, (2) if a family member is unable to find employment even though the family member has complied with the welfare agency economic self-sufficiency or work activities requirements, or (3) because a family member has not complied with other welfare agency requirements [24 CFR 5.615(b)(2)].

For special procedures related to grievance hearings based upon the GBHA's denial of a family's request to lower rent when the family experiences a welfare benefit reduction, see Chapter 14, Grievances and Appeals.

Offsets
The amount of the imputed welfare income is offset by the amount of additional income the family begins to receive after the sanction is imposed. When the additional income equals or exceeds the imputed welfare income, the imputed income is reduced to zero.

6-I.K. PERIODIC AND DETERMINABLE ALLOWANCES [24 CFR 5.609(B)(7)]
Annual income includes periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from organizations or from persons not residing with a tenant family.

Alimony and Child Support
The GBHA will count alimony or child support amounts awarded as part of a divorce or separation agreement.

> GBHA Policy
> The GBHA will count court-awarded amounts for alimony and child support received for the preceding 12 month period.

Families who do not have court-awarded alimony and child support awards are not required to seek a court award and are not required to take independent legal action to obtain collection.

Regular Contributions or Gifts
The GBHA must count as income regular monetary and nonmonetary contributions or gifts from persons not residing with a tenant family [24 CFR 5.609(b)(7)]. Temporary, nonrecurring, or sporadic income and gifts are not counted [24 CFR 5.609(c)(9)].

GBHA Policy
Examples of regular contributions include regular payment of a family's bill, cash or other liquid assets provided to any family member on a regular basis, and "in-kind" contributions such as groceries and clothing provided a family on a regular basis.

Nonmonetary contributions will be valued at the cost of purchasing the items, as determined by the GBHA. For contributions that may vary from month to month, the GBHA will include an average amount based upon past history.

6-I.L. ADDITIONAL EXCLUSIONS FROM ANNUAL INCOME
Other exclusions contained in 24 CFR 5.609(c) and updated by FR Notice 05/20/14 that have not been discussed earlier in this chapter include the following:

- Reimbursement of medical expenses [24 CFR 5.609(c)(4)]

- The full amount of student financial assistance paid directly to the student or to the education institution [24 CFR 5.609(c)(6)], except that in accordance with Section 224 of the FY 2005 Appropriations Act, the portion of any athletic scholarship assistance available for housing costs must be included in annual income [PIH Notice 2005-16].

  GBHA Policy
  Regular financial support from parents or guardians to students for food, clothing, personal items, and entertainment is not considered student financial assistance and is included in annual income.

- Amounts received by participants in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred and which are made solely to allow participation in a specific program [24 CFR 5.609(c)(8)(iii)].

- Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS) [24 CFR 5.609(c)(8)(ii)].

- Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era [24 CFR 5.609(c)(10)].

- Adoption assistance payments in excess of $480 per adopted child 24 CFR 5.609(c)(12)].

- Refunds or rebates on property taxes paid on the dwelling unit [24 CFR 5.609(c)(15)].

- Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home [24 CFR 5.609(c)(16)].

- Amounts specifically excluded by any other federal statute [24 CFR 5.609(c)(17), FR Notice 05/20/14]. HUD publishes an updated list of these exclusions periodically. It includes:

  (a) The value of the allotment provided to an eligible household under the Food Stamp Act of 1977 (7 U.S.C. 2017(b))
  (b) Benefits under Section 1780 of the School Lunch Act and Child Nutrition Act of 1966, including WIC
  (c) Payments to Volunteers under the Domestic Volunteer Services Act of 1973 (42 U.S.C. 5044(g), 5058)
  (d) Payments received under the Alaska native Claims Settlement Act (43 U.S.C. 1626(c))
  (e) Income derived from certain sub-marginal land of the US that is held in trust for certain Indian tribes (25 U.S.C. 459e)
  (f) Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program (42 U.S.C. 8625(f))
  (g) Payments received under programs funded in whole or in part under the Workforce Investment Act of 1998 (29 U.S.C. 2931)
  (h) Deferred disability benefits from the Department of Veterans Affairs, whether received as a lump sum or in monthly prospective amounts
  (i) Income derived from the disposition of funds to the Grant River Band of Ottawa Indians (Pub. L. 94-540, 90 Stat. 2503-04)
  (j) Payments, funds, or distributions authorized, established, or directed by the Seneca Nation Settlement Act of 1990 (25 U.S.C. 1774f(b))
  (k) A lump sum or periodic payment received by an individual Indian pursuant to the Class Action Settlement Agreement in the United States District Court case entitled Elouise Cobell et al. v. Ken Salazar et al, for a period of one year from the time of receipt of that payment as provided in the Claims Resolution Act of 2010.
  (l) The first $2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the US Claims Court, the interests of individual Indians in trust or restricted lands, including the first $2,000 per year of income received by individual Indians from funds derived from interest held in such trust or restricted lands (25 U.S.C. 1407-1408)
  (m) Benefits under the Indian Veterans Housing Opportunity Act of 2010 (only applies to Native American housing programs)
  (n) Payments received from programs funded under Title V of the Older Americans Act of 1985 (42 U.S.C. 3056(f))
  (o) Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in In Re Agent Orange-product liability litigation, M.D.L. No. 381 (E.D.N.Y.)
  (p) Payments received under 38 U.S.C. 1833(c) to children of Vietnam veterans born with spinal bifida, children of women Vietnam veterans born with certain birth defects, and children of certain Korean service veterans born with spinal bifida.
  (q) Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721)
  (r) The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990 (42 U.S.C. 9858q)
  (s) Earned income tax credit (EITC) refund payments received on or after January 1, 1991 (26 U.S.C. 32 (j))
  (t) Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation (Pub. L. 95-433)

(u) Amounts of scholarships funded under Title IV of the Higher Education Act of 1965, including awards under federal work-study programs or under the Bureau of Indian Affairs student assistance programs (20 U.S.C. 1087uu).
(v) Allowances, earnings, and payments to AmeriCorps participants under the National and Community Services Act of 1990 (42 U.S.C. 12637(d))
(w) Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act (42 U.S.C. 10602)
(x) Any amounts in an "individual development account" as provided by the assets for Independence Act, as amended in 2002
(y) Payments made from the proceeds of Indian tribal trust cases as described in Notice PIH 2013-30, "Exclusion from Income of Payments under Recent Tribal Trust Settlements" (25 U.S.C. 117b(a)
(z) Major disaster and emergency assistance received under the Robert T. Stafford Disaster Relief and Emergency Assistance Act and comparable disaster assistance provided by states, local governments, and disaster assistance organizations
(aa) Distributions from an ABLE account and actual or imputed interest on the ABLE account balance

PART II: ADJUSTED INCOME

6-1.A. INTRODUCTION

Overview
HUD regulations require the GBHA to deduct from annual income any of five mandatory deductions for which a family qualifies. The resulting amount is the family's adjusted income. Mandatory deductions are found in 24 CFR 5.611. This part covers policies related to these mandatory deductions. Verification requirements related to these deductions are found in Chapter 7, Verifications.

> 5.611(a) Mandatory deductions. In determining adjusted income, the responsible entity (PHA) must deduct the following amounts from annual income:
>
> (1) $480 for each dependent;
> (2) $400 for any elderly family or disabled family;
> (3) The sum of the following, to the extent the sum exceeds three percent of annual income;
> (i)Unreimbursed medical expenses of any elderly family or disabled family;
> (ii)Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed. This deduction may not exceed the earned income received by the family members who are 18 years of age or older and who are able to work because of such attendant care or auxiliary apparatus; and
> (4) Any reasonable child care expenses necessary to enable a member of the family to be employed or to further his or her education.

Anticipating Expenses

GBHA Policy

Generally, the GBHA will use current circumstances to anticipate expenses. When possible, for costs that are expected to fluctuate during the year (e.g. child care during school and nonschool periods and cyclical medical expenses), the GBHA will estimate costs based on historic data and known future costs.

If a family has an accumulated debt for medical or disability assistance expenses, the GBHA will include as an eligible expense the portion of the debt that the family expects to pay during the period for which the income determination is being made. However, amounts previously deducted will not be allowed even if the amounts were not paid as expected in a preceding period. The GBHA may require the family to provide documentation of payments made in the preceding year.

6-II.B. DEPENDENT DEDUCTION

An allowance of $480 is deducted from annual income for each dependent [24 CFR 5.611(a)(1)]. Dependent is defined as any family member other than the head, spouse, or co-head who is under the age of 18, or who is 18 or older and is a person with disabilities or a full-time student. Foster children, foster adults, and live-in aides are never considered dependents [24 CFR 5.603(b)].

6-II.C. ELDERLY OR DISABLED FAMILY DEDUCTION

A single deduction of $400 is taken for any elderly or disabled family [24 CFR 5.611(a)(2)]. An elderly family is a family whose head, spouse, co-head, or sole member is 62 years of age or older, and a disabled family is a family whose head, spouse, co-head, or sole member is a person with disabilities [24 CFR 5.403].

6-II.D. MEDICAL EXPENSES DEDUCTION [24 CFR 5.611(a)(3)(i)]

Unreimbursed medical expenses may be deducted to the extent that, in combination with any disability assistance expenses, they exceed three percent (3%) of annual income.

The medical expense deduction is permitted only for families in which the head, spouse, or co-head is at least 62 or is a person with disabilities. If a family is eligible for a medical expense deduction, the medical expenses of all family members are counted [VG, p.28].

Definition of Medical Expenses

HUD regulations define medical expenses at 24 CFR 5.603(b) to mean "medical expenses, including medical insurance premiums, that are anticipated during the period for which annual income is computed, and that are not covered by insurance."

GBHA Policy

The most current IRS Publication 502, Medical and Dental Expenses, will be used as a reference to determinethe costs that qualify as medical expenses.

Summary of Allowable Medical Expenses from IRS Publication 502	
Services of medical professionals Surgery and medical procedures that are necessary, legal, and noncosmetic Services of medical facilities Hospitalization, long-term care, and in-home	Substance abuse treatment programs Psychiatric treatment Ambulance services and some costs of transportation related to medical expenses The cost and care of necessary equipment relate to

nursing services Prescription medicines and insulin, but not nonprescription medicines even if recommended by a doctor Improvements to housing directly related to medical needs	medical condition (e.g. eyeglasses/lenses, hearing aids, crutches, and artificial teeth) Cost and continuing care of necessary service animals Medical insurance premiums or the cost of a health maintenance organization (HMO)
***Note**: This chart provides a summary of eligible medical expenses only. Detailed information is provided in IRS Publication 502. Medical expenses are considered only to the extent they are not reimbursed by insurance or some other source.*	

Families That Qualify for Both Medical and Disability Assistance Expenses

GBHA Policy

This policy applies only to families in which the head, spouse, or co-head is 62 or older or is a person with disabilities.

When expenses anticipated by a family could be defined as either medical or disability assistance expenses, the GBHA will consider them medical expenses unless it is clear that the expenses are incurred exclusively to enable a person with disabilities to work.

6-II.E. DISABILITY ASSISTANCE EXPENSES DEDUCTION [24 CFR 5.603(b) and 24 CFR 5.611(a)(3)(ii)]

Reasonable expenses for attendant care and auxiliary apparatus for a disabled family member may be deducted if they: (1) are necessary to enable a family member 18 years or older to work, (2) are not paid to a family member or reimbursed by an outside source, (3) in combination with any medical expenses, exceed three percent (3%) of annual income, and (4) do not exceed the earned income received by the family member who is enabled to work.

Earned Income Limit on the Disability Assistance Expense Deduction

A family can qualify for the disability assistance expense deduction only if at least one family member (who may be the person with disabilities) is enabled to work [24 CFR 5.603(b)].

The disability expense deduction is capped by the amount of "earned income received by family members who are 18 years of age or older and who are able to work" because of the expense [24 CFR 5.611(a)(3)(ii)]. The earned income used for this purpose is the amount verified before any earned income disallowances or income exclusions are applied.

GBHA Policy

The family must identify the family members enabled to work as a result of the disability assistance expenses. In evaluating the family's request, the GBHA will consider factors such as how the work schedule of the relevant family members relates to the hours of care provided, the time required for transportation, the relationship of the family members to the person with disabilities, and any special needs of the person with disabilities that might determine which family members are enabled to work.

When the GBHA determines that the disability assistance expenses enable more than one family member to work, the disability assistance expenses will be capped by the sum of the family members' incomes [PH Occ GB, p.124].

Eligible Disability Expenses
Examples of auxiliary apparatus are provided in the PH Occupancy Guidebook as follows: "Auxiliary apparatus: Including wheelchairs, walkers, scooters, reading devices for persons with visual disabilities, equipment added to cars and vans to permit their use by the family member with a disability, or service animals" [PH Occ GB, p.124], but only if these items are directly related to permitting the disabled person or other family member to work [HCV GB, p.5-30].

Eligible Auxiliary Apparatus

GBHA Policy
Expenses incurred for maintaining or repairing an auxiliary apparatus are eligible. In the case of an apparatus that is specially adapted to accommodate a person with disabilities (e.g. a vehicle or computer), the cost to maintain the special adaptations (but not maintenance of the apparatus itself) is an eligible expense. The cost of service animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included.

Eligible Attendant Care
The family determines the type of attendant care that is appropriate for the person with disabilities.

GBHA Policy
Attendant care includes, but is not limited to, reasonable costs for home medical care, nursing services, in-home or center-based services, interpreters for persons with hearing impairments, and readers for persons with visual disabilities.

Attendant care expenses will be included for the period that the person enabled to work is employed plus reasonable transportation time. The cost of general housekeeping and personal services is not an eligible attendant care expense. However, if the person enable to work is the person with disabilities, personal services necessary to enable the person with disabilities to work are eligible.

If the care attendant also provides other services to the family, the GBHA will prorate the cost and allow only that portion of the expenses attributable to attendant care that enables a family member to work. For example, if the care provider also cares for a child who is not the person with disabilities, the cost of care must be prorated. Unless otherwise specified by the care provider, the calculation will be based upon the number of hours spent in each activity and/or the number of persons under care.

Payments to Family Members
No disability expenses may be deducted for payments to a member of a tenant family [23 CFR 5.603(b)]. However, expenses paid to a relative who is not a member of the tenant family may be deducted if they are reimbursed by an outside source.

Necessary and Reasonable Expenses

The family determines the type of care or auxiliary apparatus to be provided and must describe how the expenses enable a family member to work. The family must certify that the disability assistance expenses are necessary and are not paid or reimbursed by any other source.

GBHA Policy
The GBHA determines the reasonableness of the expenses based on typical costs of care or apparatus in the locality. To establish typical costs, the GBHA will collect information from organizations that provide services and support to persons with disabilities. A family may present, and the GBHA will consider, the family's justification for costs that exceed typical costs in the area.

Families That Qualify for Both Medical and Disability Assistance Expenses

GBHA Policy
This policy applies only to families in which the head, spouse, or co-head is 62 or older or is a person with disabilities.

When expenses anticipated by a family could be defined as either medical or disability assistance expenses, the GBHA will consider them medical expenses unless it is clear that the expenses are incurred exclusively to enable a person with disabilities to work.

6-II.F. CHILD CARE EXPENSE DEDUCTION

HUD defines child care expenses at 24 CFR 5.603(b) as "amounts anticipated to be paid by the family for the care of children under 13 years of age, including foster children, during the period for which annual income is computed, but only where such care is necessary to enable a family member to actively seek employment, be gainfully employed, or to further his or her education and only to the extent such amounts are not reimbursed. The amount deducted shall reflect reasonable charges for child care. In the case of child care necessary to permit employment, the amount deducted shall not exceed the amount of employment in come that is included in annual income."

Child care expenses do not include child support payments made to another on behalf of a minor who is not living in an assisted family's household [VG, p.26]. However, child care expenses for foster children that are living in the assisted family's household are included when determining the family's child care expenses.

Qualifying for the Deduction

Determining Who is Enabled to Pursue an Eligible Activity

GBHA Policy
The family must identify the family member(s) enabled to pursue an eligible activity. The term eligible activity in this section means any of the activities that may make the family eligible for a child care deduction (seeking work, pursuing an education, or being gainfully employed).

In evaluating the family's request, the GBHA will consider factors such as how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the relationship of the family member(s) to the child, and any special needs of the child that might help determine which family member is enabled to pursue an eligible activity.

Seeking Work

GBHA Policy

If the child care expense being claimed is to enable a family member to seek employment, the family must provide evidence of the family member's efforts to obtain employment at each re-examination. The deduction may be reduced or denied if the family member's job search efforts are not commensurate with the child care expense being allowed by the GBHA.

Furthering Education

GBHA Policy

If the child care expense being claimed is to enable a family member to further his or her education, the member must be enrolled in school (academic or vocational) or participating in a formal training program. The family member is not required to be a full-time student, but the time spent in educational activities must be commensurate with the child care claimed.

Being Gainfully Employed

GBHA Policy

If the child care expense being claimed is to enable a family member to be gainfully employed, the GBHA reserves the right to require the family to provide evidence of the family member's employment during the time that child care is being provided. Gainful employment is any legal work activity (full- or part-time) for which a family member is compensated.

Earned Income Limit on Child Care Expense Deduction

When a family member looks for work or furthers his or her education, there is no cap on the amount that may be deducted for child care- although the care must still be necessary and reasonable. However, when child care enables a family member to work, the deduction is capped by "the amount of employment income that is included in annual income" [24 CFR 5.603(b)].

The earned income used for this purpose is the amount of earned income verified after any earned income disallowances or income exclusions are applied.

When the person who is enabled to work is a person who receives the earned income disallowance (EID) or a full-time student whose earned income above $480 is excluded, child care costs related to enabling a family member to work may not exceed the portion of the person's earned income that actually is included in annual income. For example, if a family member who qualifies for the EID makes $15,000 but because of the EID only $5,000 is included in annual income, child care expenses are limited to $5,000.

The GBHA must not limit the deduction to the least expensive type of child care. If the care allows the family to pursue more than one eligible activity, including work, the cap is calculated in proportion to the amount of time spent working [HCV GB, p.5-30].

GBHA Policy

When the child care expense being claimed is to enable a family member to work, only one family member's income will be considered for a given period of time. When more than one family member works during a given period, the GBHA generally will limit allowance child care expenses to the earned income of the lowest-paid member. The family may provide information that supports a request to designate another family member as the person enabled to work.

Eligible Child Care Expenses
The type of care to be provided is determined by the tenant family. The GBHA may not refuse to give a family the child care expense deduction because there is an adult family member in the household that may be available to provide child care [VG, p.26].

Allowable Child Care Activities

> GBHA Policy
> For school-age children, costs attributable to public or private school activities during standard school hours are not considered. Expenses incurred for supervised activities after school or during school holidays (e.g. summer day camp, after-school sports league) are allowable forms of child care.
>
> The costs of general housekeeping and personal services are not eligible. Likewise, child care expenses paid to a family member who lives in the family's unit are not eligible; however, payments for child care to relatives who do not live in the unit are eligible.
>
> If a child care provider also renders other services to a family or child care is used to enable a family member to conduct activities that are not eligible for consideration, the GBHA will prorate the costs and allow only that portion of the expense that is attributable to child care for eligible activities. For example, if the care provider also cares for a child with disabilities who is 13 or older, the cost of care will be prorated. Unless otherwise specified by the child care provider, the calculation will be based upon the number of hours spend in each activity and/or the number of persons under care.

Necessary and Reasonable Costs
Child care expenses will be considered necessary if: (1) a family adequately explains how the care enables a family member to work, actively seek employment, or further his or her education, and (2) the family certifies, and the child care provider verifies, that the expenses are not paid or reimbursed by any other source.

> GBHA Policy
> Child care expenses will be considered for the time required for the eligible activity plus reasonable transportation time. For child care that enables a family member to go to school, the time allowed may include not more than one study hour for each hour spent in class.
>
> Families may present, and the GBHA will consider, justification for costs that exceed typical costs in the area.

6-II.G. PERMISSIVE DEDUCTIONS [24 CFR 5.611(b)(1)]
Permissive deductions are additional, optional deductions that may be applied to annual income. As with mandatory deductions, permissive deductions must be based on need or family circumstance and deductions must be designed to encourage self-sufficiency or other economic purpose. If the GBHA offers permissive deductions, they must be granted to all families that qualify for them and should complement existing income exclusions and deductions [PH Occ GB, p.128].

The Form HUD-50058 Instruction Booklet states that the maximum allowable amount for total permissive deductions is less than $90,000 per year.

GBHA Policy
The GBHA utilizes the following as permissive deductions:

- Self Sufficiency Incentives: Wages earned by GBHA-paid Casual Workers

PART III: CALCULATING RENT

6-III.A. OVERVIEW OF INCOME-BASED RENT CALCULATIONS

The first step in calculating income-based rent is to determine each family's total tenant payment (TTP). Then, if the family is occupying a unit that has tenant-paid utilities, the utility allowance is subtracted from the TTP. The result of this calculation, if a positive number, is the tenant rent. If the TTP is less than the utility allowance, the result of this calculation is a negative number, and is called the utility reimbursement, which may be paid to the family or directly to the utility company by the GBHA.

TTP Formula [24 CFR 5.628]

HUD regulations specify the formula for calculating the total tenant payment (TTP) for a tenant family. TTP is the highest of the following amounts, rounded to the nearest dollar:

- 30 percent of the family's monthly adjusted income (adjusted income is defined in Part II)
- 10 percent of the family's monthly gross income (annual income, as defined in Part I, divided by 12)
- The welfare rent (in as-paid states only)
- A minimum rent between $0 and $50 that is established by the GBHA

The GBHA has authority to suspend and exempt families from minimum rent when a financial hardship exists, as defined in section 6-III.B.

Welfare Rent [24 CFR 5.628]

GBHA Policy
Welfare rent does not apply to this locality.

Minimum Rent [24 CFR 5.630]

GBHA Policy
The minimum rent for this locality is $50.

Optional Changes to Income-Based Rents [24 CFR 960.253(c)(2) and PH Occ GB, pp.131-134]

The GBHA has been given very broad flexibility to establish its own, unique rent calculation system as long as the rent produced is not higher than that calculated using the TTP and mandatory deductions. At the discretion of the GBHA, rent policies may structure a system that uses combinations of permissive deductions, escrow accounts, income-based rents, and the required flat and minimum rents.

The GBHA's minimum rent and rent choice policies still apply to affected families. Utility allowances are applied to GBHA designed income-based rents in the same manner as they are applied to the regulatory income-based rents.

The choices are limited only by the requirement that the method used not produce a TTP or tenant rent greater than the TTP or tenant rent produced under the regulatory formula.

GBHA Policy
The GBHA chooses not to adopt optional changes to income-based rents.

Ceiling Rents [24 CFR 960.253(c)(2) and (d)]
Ceiling rents are used to cap income-based rents. They are part of the income-based formula. If the calculated TTP exceeds the ceiling rent for the unit, the ceiling rent is used to calculate tenant rent (ceiling rent/TTP minus utility allowance). Increases in income do not affect the family since the rent is capped. The use of ceiling rents fosters upward mobility and income mixing.

Because of the mandatory use of flat rents, the primary function of ceiling rents now is to assist families who cannot switch back to flat rent between annual re-examinations and would otherwise be paying an income-based tenant rent that is higher than the flat rent.

Ceiling rents must be set to the level required for flat rents (which will require the addition of the utility allowance to the flat rent for properties with tenant-paid utilities) [PH Occ GB, p.135].

GBHA Policy
The GBHA chooses not to use ceiling rents.

Utility Reimbursements [24 CFR 960.253(c)(3)]
Utility reimbursement occurs when any applicable utility allowance for tenant-paid utilities exceeds the TTP. HUD permits the GBHA to pay the reimbursement to the family or directly to the utility provider.

GBHA Policy
The GBHA will make utility reimbursements directly to the utility provider.

6-III.B. FINANCIAL HARDSHIPS AFFECTING MINIMUM RENT [24 CFR 5.630]

GBHA Policy
The GBHA has established a minimum rent of $50.

Overview
If the PHA establishes a minimum rent greater than zero, the PHA must grant an exemption from the minimum rent if a family is unable to pay the minimum rent because of financial hardship.

The financial hardship exemption applies only to families required to pay the minimum rent. If a family's TTP is higher than the minimum rent, the family is not eligible for a hardship exemption. If the PHA determines that a hardship exists, the TTP is the highest of the remaining components of the family's calculated TTP.

HUD-Defined Financial Hardship
Financial hardship includes the following situations:

(1) The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program. This includes a family member who is a noncitizen lawfully admitted for permanent residence under the Immigration and Nationality Act who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996.

GBHA Policy
A hardship will be considered to exist only if the loss of eligibility has an impact on the families ability to pay the minimum rent.

For a family waiting for a determination of eligibility, the hardship period will end as of the first of the month following (1) implementation of assistance, if approved, or (2) the decision to deny assistance. A family whose request for assistance is denied may request a hardship exemption based upon one of the other allowable hardship circumstances.

(2) The family would be evicted because it is unable to pay the minimum rent.

GBHA Policy
For a family to qualify under this provision, the cause of the potential eviction must be the family's failure to pay rent or tenant-paid utilities.

(3) Family income has decreased because of changed family circumstances, including the loss of employment.

(4) A death has occurred in the family.

GBHA Policy
In order to qualify under this provision, a family must describe how the death has created a financial hardship (e.g. because of funeral-related expenses or the loss of the family member's income).

(5) The family has experienced other circumstances determined by the PHA.

GBHA Policy
The GBHA has not established any additional hardship criteria.

Implementation of Hardship Exemption

Determination of Hardship
When a family requests a financial hardship exemption, the GBHA must suspend the minimum rent requirement beginning the first of the month following the family's request.

The GBHA then determines whether the financial hardship exists and whether the hardship is temporary or long-term.

GBHA Policy
The GBHA defines temporary hardship as a hardship expected to last 90 days or less. Long term hardship is defined as a hardship expected to last more than 90 days.

The GBHA may not evict the family for nonpayment of minimum rent during the 90-day period beginning the month following the family's request for a hardship exemption.

When the minimum rent is suspended, the TTP reverts to the highest of the remaining components of the calculated TTP. The example below demonstrates the effect of the minimum rent exemption.

Example: Impact of Minimum Rent Exemption Assume the PHA has established a minimum rent of $35.	
TTP—No Hardship	**TTP—With Hardship**
$0 30% of monthly adjusted income $15 10% of monthly gross income N/A Welfare rent $35 Minimum rent	$0 30% of monthly adjusted income $15 10% of monthly gross income N/A Welfare rent $35 Minimum rent
Minimum rent applies. TTP = $35	Hardship exemption granted. TTP = $15

GBHA Policy
To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship and how the hardship has affected the family's ability to pay the minimum rent.

The GBHA will make the determination of hardship within 30 calendar days.

No Financial Hardship
If the GBHA determines there is no financial hardship, the GBHA will reinstate the minimum rent and require the family to repay the amounts suspended.

For procedures pertaining to grievance hearing requests based upon the GBHA's denial of a hardship exemption, see Chapter 14, Grievances and Appeals.

GBHA Policy
The GBHA will require the family to repay the suspended amount within 30 calendar days of the GBHA's notice that hardship exemption has not been granted.

Temporary Hardship
If the GBHA determines that a qualifying financial hardship is temporary, the GBHA must reinstate the minimum rent from the beginning of the first of the month following the date of the family's request for a hardship exemption.

The family must resume payment of the minimum rent and must repay the GBHA the amounts suspended. HUD requires the GBHA to offer a reasonable repayment agreement, on terms and conditions established by the GBHA. The GBHA also may determine that circumstances have changed and the hardship is now a long-term hardship.

For procedures pertaining to grievance hearing requests based upon the GBHA's denial of a hardship exemption, see Chapter 14, Grievances and Appeals.

GBHA Policy
The GBHA will enter into a repayment agreement in accordance with the GBHA's repayment agreement policy (see Chapter 16).

Long-Term Hardship
If the GBHA determines that the financial hardship is long-term, the GBHA must exempt the family from the minimum rent requirement for so long as the hardship continues. The exemption will apply from the

first of the month following the family's request until the end of the qualifying hardship. When the financial hardship has been determined to be long-term, the family is not required to repay the minimum rent.

GBHA Policy
The hardship period ends when any of the following circumstances apply:

(1) At an interim or annual re-examination, the family's calculated TTP is greater than the minimum rent.
(2) For hardship conditions based on loss of income, the hardship condition will continue to be recognized until new sources of income are received that are at least equal to the amount lost. For example, if a hardship is approved because a family no longer receives a $60/month child support payment, the hardship will continue to exist until the family receives at least $60/month in income from another source or once again begins to receive the child support.
(3) For hardship conditions based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred.

6-III.C. UTILITY ALLOWANCES [24 CFR 965, Subpart E]

Overview
Utility allowances are provided to families paying income-based rents when the cost of utilities is not included in the rent. When determining a family's income-based rent, the GBHA must use the utility allowance applicable to the type of dwelling unit leased by the family.

For policies on establishing an updating utility allowances, see Chapter 16.

Reasonable Accommodation [24 CFR 8]
On request from a family, the GBHA must approve a utility allowance that is higher than the applicable amount for the dwelling unit if a higher utility allowance is needed as a reasonable accommodation to make the program accessible to and usable by the family with a disability [PH Occ GB, p.172].

Residents with disabilities may not be charged for the use of certain resident-supplied appliances if there is a verified need for special equipment because of the disability [PH Occ GB, p.172].

See Chapter 2 for policies related to reasonable accommodations.

Utility Allowance Revisions [24 CFR 965.507]
The GBHA must review its schedule of utility allowances each year. Between annual revisions, the GBHA must revise the utility allowance schedule if there is a rate change that by itself or together with prior rate changes not adjusted for, results in a change of 10 percent or more from the rate on which such allowances were based. Adjustments to resident payments as a result of such changes must be retroactive to the first day of the month following the month in which the last rate change taken into account in such revision became effective [PH Occ GB, p.171].

The tenant rent calculations must reflect any changes in the GBHA's utility allowance schedule [24 CFR 960.253(c)(3)].

GBHA Policy

Unless the GBHA is required to revise the utility allowances retroactively, revised utility allowances will be applied to a family's rent calculations at the first annual re-examinations after the allowance is adopted.

6-III.D. PRORATED RENT FOR MIXED FAMILIES [24 CFR 5.520]

HUD regulations prohibit assistance to ineligible family members. A mixed family is one that includes at least one U.S. citizen or eligible immigrant and any number of ineligible family members. The GBHA must prorate the assistance provided to a mixed family. The GBHA will first determine TTP as if all family members were eligible and then prorate the rent based upon the number of family members that actually are eligible. To do this, the GBHA must:

(1) Subtract the TTP from a maximum rent applicable to the unit. The result is the maximum subsidy for which the family could qualify if all members were eligible.
(2) Divide the family maximum subsidy by the number of persons in the family to determine the maximum subsidy per each family member who is eligible (member maximum subsidy).
(3) Multiply the member maximum subsidy by the number of eligible family members.
(4) Subtract the subsidy calculated in the last step from the maximum rent. This is the prorated TTP.
(5) Subtract the utility allowance for the unit from the prorated TTP. This is the prorated rent for the mixed family.

GBHA Policy

Revised public housing maximum rents will be applied to a family's rent calculation at the first annual re-examination after the revision is adopted.

For policies related to the establishment of the public housing maximum rent see Chapter 16.

6-III.E. FLAT RENTS AND FAMILY CHOICE IN RENTS [24 CFR 960.2530

Flat Rents [24 CFR 960.253(b)]

The flat rent is designed to encourage self-sufficiency and to avoid creating disincentives for continued residency by families who are attempting to become economically self-sufficient.

Changes in family income, expenses, or composition will not affect the flat rent amount because it is outside the income-based formula.

Policies related to the re-examination of families paying flat rent are contained in Chapter 9, and policies related to the establishment and reviews of flat rents are contained in Chapter 16.

Family Choice in rents [24 CFR 960.253(a) and (c)]

Once each year, the GBHA must offer families the choice between a flat rent and an income-based rent. The family may not be offered this choice more than once a year. The GBHA must document that flat rents were offered to families under the methods used to determine flat rents for the GBHA.

GBHA Policy

The annual GBHA offer to a family of the choice between flat and income-based rent will be conducted upon admission and upon each subsequent annual re-examination.

The GBHA will require families to submit their choice of flat or income-based rent in writing and will maintain such requests in the tenant file as part of the admission or annual re-examination process.

The GBHA must provide sufficient information for families to make an informed choice. This information must include the GBHA's policy on switching from flat rent to income-based rent due to financial hardship and the dollar amount of the rent under each option. However, if the family chose the flat rent for the previous year, the GBHA is required to provide an income-based rent amount only in the year that a re-examination of income is conducted or if the family specifically requests it and submits updated income information.

Switching from Flat Rent to Income-Based Rent Due to Hardship [24 CFR 960.253(f)]
A family can opt to switch from flat rent to income-based rent at any time if they are unable to pay the flat rent due to financial hardship. If the GBHA determines that a financial hardship exists, the GBHA must immediately allow the family to switch from flat rent to the income-based rent.

<u>GBHA Policy</u>
Upon determination by the GBHA that a financial hardship exists, the GBHA will allow a family to switch from flat rent to income-based rent effective the first of the month following the family's request.

Reasons for financial hardship include:

- The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance
- The family has experienced an increase in expenses, because of changed circumstances, for medical costs, child care, transportation, education, or similar items
- Such other situations determined by the GBHA to be appropriate

<u>GBHA Policy</u>
The GBHA considers payment of flat rent to be a financial hardship whenever the switch to income-based rent would be lower than the flat rent [PH Occ GB, p.137]

Phasing In Flat Rents [Notice PIH 2014-12]
For current residents whose rent would increase as a result of new flat rent requirements, the GBHA must restrict the increases to no more than 35 percent of the current tenant rent per year. This would necessitate a phase-in of the rent increase.

Flat Rent Impact Analysis Calculation
In order to conduct a flat rent impact analysis, the GBHA must multiply the family's current rent amount by 1.35 and compare the result to the flat rent under the GBHA's policies.

Example: A family was paying a flat rent of $500 per month. At their annual recertification, the GBHA has increased the flat rent for their unit size to $700. The gBHA would conduct a flat rent impact analysis as follows:

$500 x 1.35 = $675

Since the GBHA's increased flat rent of $700 would result in a rent increase of more than 35 percent, the GBHA would offer the family the choice to pay either $675 per month or an income-based rent. The flat rent increase would need to be phased-in.

GBHA Policy

The GBHA will conduct a flat rent impact analysis to determine the percentage increase in the family's rent amount. If the increase is greater than 35 percent, the GBHA will phase in the rent increase at the maximum amount annually over a three-year period so that it does not exceed 35 percent in any year until the flat rent is fully phased in. If the increase is 35 percent or less, there will be no phase-in. [Notice PIH 2014-12]

Flat Rents and Earned Income Disallowance [A&O FAQS]

Because the EID is a function of income-based rents, a family paying flat rent cannot qualify for the EID even if a family member experiences an event that would qualify the family for the EID. If the family later chooses to pay income-based rent, they would only qualify for the EID if a new qualifying event occurred.

A family currently paying flat rent that previously qualified for the EID while paying income-based rent and is currently within their 48 month period would have the 12 cumulative months of full (100 percent) and phase-in (50 percent) exclusion continue while paying flat rent as long as the employment that is the subject of the exclusion continues, and the 48-month lifetime limit would continue uninterrupted. A family paying flat rent could therefore see a family member's 48-month lifetime limit expire while the family is paying flat rent.

Flat Rents and Mixed Families [A&O FAQS]

Mixed families electing to pay flat rent must first have a flat rent worksheet completed to see if the flat rent must be prorated. The worksheet is located in Appendix III of the Form HUD-50058 Instruction Booklet.

If the flat rent is greater than or equal to the public housing maximum rent, there is no proration of flat rent and the family pays the flat rent for the unit.

If the flat rent is less than the maximum rent, the worksheet will calculate a prorated flat rent. The mixed family will pay the prorated flat rent.

EXHIBIT 6-1: ANNUAL INCOME INCLUSIONS

24 FR 5.609

(a) Annual income means all amounts, monetary or not, which:

(1) Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member, or

(2) Are anticipated to be received from a source outside the family during the 12-month period following admission or annual re-examination effected date; and

(3) Which are not specifically excluded in paragraph (c) of this section.

(4) Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

(b) *Annual income includes, but is not limited to:*

(1) The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services;

(2) The net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family;

(3) Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation is permitted only as authorized in paragraph (b)(2) of this section. Any withdrawal of cash or assets from an investment will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested by the family. Where the family has net family assets in excess of $5,000, annual income shall include the greater of the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate, as determined by HUD;

(4) The full amount of periodic amounts received from Social Security, annuities, insurance policies, retirements funds, pensions, disability or death benefits, and other similar types of periodic receipts, including a lump-sum amount or prospective monthly amounts for the delayed start of a periodic amount 9except as provided in paragraph (c)(14) of this section);

(5) Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation and severance pay (except as provided in paragraph (c)(3) of this section);

(6) Welfare assistance payments.

(i) Welfare assistance payments made under the Temporary Assistance for Needy Families (TANF) program are included in annual income only to the extent such payments:

(A) Qualify as assistance under the TANF program definition at 45 CFR 260.31; and

(B) Are not otherwise excluded under paragraph (c) of this section.

(ii) If the welfare assistance payment includes an amount specifically designated for shelter and utilities that is subject to adjustment by the welfare assistance agency in accordance with the actual cost of shelter and utilities, the amount of welfare assistance income to be included as income shall consist of:

(A) The amount of the allowance or grant exclusive of the amount specifically designated for shelter or utilities; plus

(B) The maximum amount that the welfare assistance agency could in fact allow the family for shelter and utilities. If the family's welfare assistance is ratably reduced from the standard of need by applying a percentage, the amount calculated under this paragraph shall be the amount resulting from one application of the percentage.

(7) Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from organizations or form persons not residing in the dwelling;

(8) All regular pay, special pay and allowances of a member of the Armed Forces (except as provided in paragraph (c)(7) of this section)

(9) For section 8 programs only and as provided in 24 CFR 5.612, any financial assistance, in excess of amounts received for tuition, that an individual receives under the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.), from private sources, or from an institution of higher education (as defined under the Higher Education Act of 1965 (20 U.S.C. 1002)), shall be considered income to that individual, except that financial assistance described in this paragraph is not considered annual income for persons over the age of 23 with dependent children. For purposes of this paragraph, "financial assistance" does not include loan proceeds for the purpose of determining income.

HHS DEFINITION OF "ASSISTANCE"

45 CFR: GENERAL TEMPORARY ASSISTANCE FOR NEEDY FAMILIES

260.31 What does the term "assistance" mean?

(a)(1) The term "assistance" includes cash, payments, vouchers, and other forms of benefits designed to meet a family's ongoing basic needs (i.e. for food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses)

(2) It includes such benefits even when they are:

(i) Provided in the form of payments by a TANF agency, or other agency on its behalf, to individual recipients; and

(ii) Conditioned on participation in work experience or community service (or any other work activity under 261.30 of this chapter).

(3) Except where excluded under paragraph (b) of this section, it also includes supportive services such as transportation and child care provided to families who are not employed.

(b) [The definition of "assistance"] excludes: (1) Nonrecurrent, short-term benefits that:

(i) Are designed to deal with a specific crisis situation or episode of need;
(ii) Are not intended to meet recurrent or ongoing needs; and

(iii) Will not extend beyond four months.

(2) Work subsidies (i.e. payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training);

(3) Supportive services such as child care and transportation provided to families who are employed;

(4) Refundable earned income tax credits;

(5) Contributions to, and distributions from, Individual Development Accounts;

(6) Services such as counseling, case management, peer support, child care information and referral, transitional services, job retention, job advancement, and other employment-related services that do not provide basic income support; and

(7) Transportation benefits provided under a Job Access or Reverse Commute project, pursuant to section 404(k) of [the Social Security] Act, to an individual who is not otherwise receiving assistance

EXHIBIT 6-2: ANNUAL INCOME EXCLUSIONS

24 CFR 5.609

(c) Annual income does not include the following:

(1) Income from employment of children (including foster children) under the age of 18 years;

(2) Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the tenant family, who are unable to live alone);

(3) Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for person or property losses (except as provided in paragraph (b)(5) of this section);

(4) Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member;

(5) Income of a live-in aide, as defined in Sec. 5.403;

(6) Subject to paragraph (b)(9) of this section, the full amount of student financial assistance paid directly to the student or to the educational institution;

(7) The special pay to a family member serving in the Armed Forces who is exposed to hostile fire;

(8)(i) Amounts received under training programs funded by HUD;

(ii) Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS);

(iii) Amounts received by a participant in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, child care, etc.) and which are made solely to allow participation in a specific program;

(iv) Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed $200 per month) received by a resident for performing a service for the GBHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, law maintenance, resident initiatives coordination, and serving as a member of the GBHA's governing board. No resident may receive more than one such stipend during the same period of time;

(v) Incremental earnings and benefits resulting to any family member from participation in qualifying State or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for the period during which the family member participates in the employment training program;

(9) Temporary, nonrecurring or sporadic income (including gifts);

(10) Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;

(11) Earnings in excess of $480 for each full-time student 18 years old or older (excluding the head of household and spouse);

(12) Adoption assistance payments in excess of $480 per adopted child;

(13) [Reserved]

(14) Deferred periodic amounts from supplemental security income and social security benefits that are received in a lump sum amount or in prospective monthly amounts.

(15) Amounts received by the family in the form of

refunds or rebates under State or local law for property taxes paid on the dwelling unit;

(16) Amounts paid by a State agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home; or

(17) Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions set forth in 24 CFR 5.609(c) apply. A notice will be published in the Federal Register and distributed to PHAs and housing owners identifying the benefits that qualify for this exclusion. Updates will be published and distributed when necessary [See following chart for a list of benefits that qualify for this exclusion.]

EXHIBIT 6-3: TREATMENT OF FAMILY ASSETS

24 CFR 5.603(b) Net Family Assets

(1) Net cash value after deducting reasonable costs that would be incurred in disposing of real property, savings, stocks, bonds, and other forms of capital investment, excluding interests in Indian trust land and excluding equity accounts in HUD homeownership programs. The value of necessary items of personal property such as furniture and automobiles shall be excluded.

(2) In cases where a trust fund has been established and the trust is not revocable by, or under the control of, any member of the family or household, the value of the trust fund will not be considered an asset so long as the fund continues to be held in trust. Any income distributed from the trust fund shall be counted when determining annual income under Sec. 5.609.

(3) In determining net family assets, PHAs or owners, as applicable, shall include the value of any business or family assets disposed of by an applicant or tenant for less than fair market value (including a disposition in trust, but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application for the program or re-examination, as applicable, in excess of the consideration received therefore. In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be for less than fair market value if the applicant or tenant receives important consideration not measurable in dollar terms.

(4) For purposes of determining annual income under Sec. 5.609, the term "net family assets" does not include the value of a home currently being purchased with assistance under part 982, subpart M of this title. This exclusion is limited to the first 10 years after the purchase date of the home.

EXHIBIT 6-4: EARNED INCOME DISALLOWANCE

24 CFR 960.255 Self-Sufficiency Incentive- Disallowance of increase in annual income.

(a) *Definitions*. The following definitions apply for purposes of this section.

Disallowance. Exclusion from annual income.

Previously unemployed includes a person who has earned, in the twelve months previous to employment, no more than would be received for 10 hours of work per week for 50 weeks at the established minimum wage.

Qualified family. A family residing in public housing:

(i) Whose annual income increases as a result of employment of a family member who was unemployed for one or more years previous to employment;

(ii) Whose annual income increases as a result of increased earnings by a family member during participation in any economic self-sufficiency or other job training program; or

(iii) Whose annual income increases, as a result of new employment or increased earnings of a family member, during or within six months after receiving assistance, benefits or services under any state program for temporary assistance for needy families funded under Part A of Title IV of the Social Security Act, as determined by the PHA in consultation with the local agencies administering temporary assistance for needy families (TANF) and Welfare-to-Work (WTW) programs. The TANF program is not limited to monthly income maintenance, but also includes such benefits and services as one-time payments, wage subsidies and transportation assistance—provided that the total amount over a six-month period is at least $500.

(b) *Disallowance of increase in annual income*.

(1) *Initial twelve month exclusion*. During the cumulative twelve month period beginning on the date a member of a qualified family is first employed or the family first experiences an increase in annual income attributable to employment, the PHA must exclude from annual income (as defined in 5.609 of this title) of a qualified family any increase in income of the family member as a result of employment over prior income of that family member.

(2) *Second twelve month exclusion and phase-in*.
During the second cumulative twelve month period after the date a member of a qualified family is first employed or the family first experiences an increase in annual income attributable to employment, the PHA must exclude from annual income of a qualified family fifty percent of any increase in income of such family member as a result of employment over income of that family member prior to the beginning of such employment.

(3) *Maximum four year disallowance*. The disallowance of increased income of an individual family member as provided in paragraph (b)(1) or (b)(2) of this section is limited to a lifetime 48 month period. It only applies for a maximum of twelve months for disallowance under paragraph (b)(1) and a maximum of twelve months for disallowance under paragraph (b)(2), during the 48 month period starting from the initial exclusion under paragraph (b)(1) of this section.

(c) *Inapplicability to admission*. The disallowance of increases in income as a result of employment under this section does not apply for purposes of admission to the program (including the determination of income eligibility and income targeting).

(d) Individual Savings Accounts. As an alternative to the disallowance of increases in income as a result of employment described in paragraph (b) of this section, a PHA may choose to provide for individual savings accounts for public housing residents who pay an income-based rent, in accordance with a written policy, which must include the following provisions:

(1) The PHA must advise the family that the savings account option is available:

(2) At the option of the family, the PHA must deposit in the savings account the total amount that would have been included in tenant rent payable to the PHA as a result of increased income that is disallowed in accordance with paragraph (b) of this section;

(3) Amounts deposited in a savings account may be withdrawn only for the purpose of:

(i) Purchasing a home;

(ii) Paying education costs of family members;

(iii) Moving out of public or assisted housing; or

(iv) Paying any other expense authorized by the PHA for the purpose of promoting the economic self-sufficiency of residents of public housing;

(4) The PHA must maintain the account in an interest bearing investment and must credit the family with the net interest income, and the PHA may not charge a fee for maintaining the account;

(5) At least annually, the PHA must provide the family with a report on the status of the account; and

(6) If the family moves out of public housing, the PHA shall pay the tenant any balance in the account, minus any amounts owed to the PHA

EXHIBIT 6-5: THE EFFECT OF WELFARE BENEFIT REDUCTION

24 CFR 5.615

Public housing program and Section 8 tenant-based assistance program: How welfare benefit reduction affects family income.

(a) *Applicability*. This section applies to covered families who reside in public housing (part 960 of this title) or receive Section 8 tenant-based assistance (part 982 of this title).

(b) *Definitions*. The following definitions apply for purposes of this section:

Covered families. Families who receive welfare assistance or other public assistance benefits ("welfare benefits") from a State or other public agency ("welfare agency") under a program for which Federal, State, or local law requires that a member of the family must participate in an economic self-sufficiency program as a condition for such assistance.

Economic self-sufficiency program. See definition at Sec. 5.603.

Imputed welfare income. The amount of annual income not actually received by a family, as a result of a specified welfare benefit reduction, that is nonetheless included in the family's annual income for purposes of determining rent.

Specified welfare benefit reduction.

(1) A reduction of welfare benefits by the welfare agency, in whole or in part, for a family member, as determined by the welfare agency, because of fraud by a family member in connection with the welfare program; or because of welfare agency sanction against a family member for noncompliance with a welfare agency requirement to participate in an economic self-sufficiency program.

(2) "Specified welfare benefit reduction" does not include a reduction or termination of welfare benefits by the welfare agency:

(i) at expiration of a lifetime or other time limit on the payment of welfare benefits;

(ii) because a family member is not able to obtain employment, even though the family member has complied with welfare agency economic self-sufficiency or work activities requirements; or

(iii) because a family member has not complied with other welfare agency requirements.

(c) *Imputed welfare income*.

(1) A family's annual income includes the amount of imputed welfare income (because of a specified welfare benefits reduction, as specified in notice to the PHA by the welfare agency), plus the total amount of other annual income as determined in accordance with Sec. 5.609.

(2) At the request of the PHA, the welfare agency will inform the PHA in writing of the amount and term of any specified welfare benefit reduction for a family member, and the reason for such reduction, and will also inform the PHA of any subsequent changes in the term or amount of such specified welfare benefit reduction. The PHA will use this information to determine the amount of imputed welfare income for a family.

(3) A family's annual income includes imputed welfare income in family annual income, as determined at the PHA's interim or regular re-examination of family income and composition, during the term of the welfare benefits reduction (as specified in information provided to the PHA by the welfare agency).

(4) The amount of the imputed welfare income is offset by the amount of additional income a family receives that commences after the time the sanction was imposed. When such additional income from other sources is at least equal to the imputed.

(5) The PHA may not include imputed welfare income in annual income if the family was not an assisted resident at the time of sanction.

(d) *Review of PHA decision.*

(1) Public housing. If a public housing tenant claims that the PHA has not correctly calculated the amount of imputed welfare income in accordance with HUD requirements, and if the PHA denies the family's request to modify such amount, the PHA shall give the tenant written notice of such denial, with a brief explanation o the basis for the PHA determination of the amount of imputed welfare income. The PHA

notice shall also state that if the tenant does not agree with the PHA determination, the tenant may request a grievance hearing in accordance with part 966, subpart B of this title to review the PHA determination. The tenant is not required to pay an escrow deposit pursuant to Sec. 966.55(e) for the portion of tenant rent attributable to the imputed welfare income in order to obtain a grievance hearing on the PHA determination.

(2) Section 8 participant. A participant in the Section 8 tenant-based assistance program may request an informal hearing, in accordance with Sec. 982.555 of this title, to review the PHA determination of the amount of imputed welfare income that must be included in the family's annual income in accordance with this section. If the family claims that such amount is not correctly calculated n accordance with HUD requirements, and if the PHA denies the family's request to modify such amount, the PHA shall give the family written notice of such denial, with a brief explanation of the basis for the PHA determination of the amount of imputed welfare income. Such notice shall also state that if the family does not agree with the PHA determination, the family may request an informal hearing on the determination under the PHA hearing procedure.

(e) *PHA relation with welfare agency*

(1) The PHA must ask welfare agencies to inform the PHA of any specified welfare benefits reduction for a family member, the reason for such reduction, the term of any such reduction, and any subsequent welfare agency determination affecting the amount or term of a specified welfare benefits reduction. If the welfare agency determines a specified welfare benefits reduction for a family member, and gives the PHA written notice of such reduction, the family's annual incomes shall include the imputed welfare income because of the specified welfare benefits reduction.

(2) The PHA is responsible for determining the amount of imputed welfare income that is included in the family's annual income as a result of a specified welfare benefits reduction as determined by the welfare agency, and specified in the notice by the welfare agency to the PHA. However, the PHA is not responsible for determining whether a reduction of welfare benefits by the welfare agency was correctly determined by the welfare agency in accordance with welfare program requirements and procedures, nor for providing the opportunity for review or hearing on such welfare agency determinations.

(3) Such welfare agency determinations are the responsibility of the welfare agency, and the family may seek appeal of such determinations through the welfare agency's normal due process procedures The PHA shall be entitled to rely on the welfare agency notice to the PHA of the welfare agency's determination of a specified welfare benefits reduction.

Report to the
Housing Authority of the City of Green Bay

MEETING DATE	PREPARED BY
October 17, 2019	Jayme Valentine, Staff

AGENDA ITEM # D.5.

Consideration with possible action to amend Chapter 7 - (Verification) of the Admissions and Continued Occupancy Plan.

BACKGROUND

New updates were announced by the Department of Housing and Urban Development which the Green Bay Housing Authority is requesting to adopt.

Key changes include updates to the web addresses and Public and Indian Housing Notice numbers, HUD's hierarchy of acceptable documents for income and when each document is acceptable.

RECOMMENDATION

Staff is recommending approval to amend Chapter 7 - (Verification) of the Admissions and Continued Occupancy Plan.

FISCAL IMPACT

ATTACHMENTS

1. Chapter 7- Verification

Chapter 7

VERIFICATION
[24 CFR 960.259, 24 CFR 5.230, Notice PIH 2018-18]

INTRODUCTION
The GBHA must verify all information that is used to establish the family's eligibility and level of assistance and is required to obtain written authorization from the family in order to collect the information. Applicants and program participants must cooperate with the verification process as a condition of receiving assistance. The GBHA must not pass on the cost of verification to the family.

The GBHA will ~~must~~ follow the verification guidance provided by HUD in the Notice PIH 2018~~0~~-18~~9~~, and this chapter summarizes those requirements and provides supplementary GBHA policies.

Part I describes the general verification process. Part II provides more detailed requirements related family information~~-~~. Part III provides information on income and assets, and Part IV covers mandatory deductions.

Verification policies, rules and procedures will be modified as needed to accommodate persons with disabilities. All information obtained through the verification process will be handled in accordance with the records management policies established by the GBHA.

PART I: GENERAL VERIFICATION REQUIREMENTS

7-1.A. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 960.259, 24 CFR 5.230]
The family must supply any information that the GBHA or HUD determines is necessary to the administration of the program and must consent to GBHA verification of that information [24 CFR 960.259(a)(1)].

Consent Forms
It is required that all adult applicants and tenants sign form HUD-9886, Authorization for Release of Information. The purpose of form HUD-9886 is to facilitate automated data collection and computer matching from specific sources and provides the family's consent only for the specific purposes listed on the form. HUD and the GBHA may collect information from State Wage Information Collection Agencies (SWICAs) and current and former employers of adult family members. Only HUD is authorized to collect information directly from the Internal Revenue Service (IRS) and the Social Security Administration (SSA). Adult family members must sign other consent forms as needed to collect information relevant to the family's eligibility and level of assistance.

Penalties for Failing to Consent [24 CFR 5.232]
If any family member who is required to sign a consent form fails to do so, the GBHA will deny admission to applicants and terminate the lease of tenants. The family may request a hearing in accordance with the GBHA's grievance procedures.

7-I.B. OVERVIEW OF VERIFICATION REQUIREMENTS

HUD's Verification Hierarchy [Notice PIH ~~2010~~2018-18~~9, VG~~]
HUD mandates the use of the EIV system and offers administrative guidance on the use of other methods to verify family information and specifies the circumstances in which each method will be used. In

general, HUD requires the GBHA to use the most reliable form of verification that is available and to document the reasons when the GBHA uses a lesser form of verification.

GBHA Policy
In order of priority, the forms of verification that the GBHA will use are:

Up-front Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) system

Up-front Income Verification (UIV) using a non-HUD system

Written Third Party Verification (may be provided by applicant or resident)

Written Third-party Verification Form

Oral Third-party Verification

Self-Certification

Each of the verification methods is discussed in subsequent sections below. Exhibit 7-1 at the end of the chapter contains an excerpt from the Verification Guidance that provides guidance with respect to how each method may be used.

Requirements for Acceptable Documents

GBHA Policy
Any documents used for verification must be the original (not photocopies) and generally must be dated within 60 calendar days of the date they are provided to the GBHA. The documents must not be damaged, altered or in any way illegible.

Print-outs from web pages are considered original documents.

The GBHA staff member who views the original document must make a photocopy, annotate the copy with the name of the person who provided the document and the date the original was viewed, and sign the copy.

Any family self-certifications must be made in a format acceptable to the GBHA and must be signed ~~in the presence of a GBHA representative or GBHA notary public~~and notarized.

File Documentation
The GBHA must document in the file how the figures used in income and rent calculations were determined. All verification attempts, information obtained, and decisions reached during the verification process will be recorded in the family's file in sufficient detail to demonstrate that the GBHA has followed all of the verification policies set forth in this ACOP. The record should be sufficient to enable a staff member or HUD reviewer to understand the process followed and conclusions reached.

GBHA Policy
The GBHA will document, in the family file, the following:

Reported family annual income

Value of assets

Expenses related to deductions from annual income

Other factors influencing the adjusted income or income-based rent determination

When the GBHA is unable to obtain third-party verification, the GBHA will document in the family file the reason that third-party verification was not available [24 CFR 960.259(c)(1);Notice PIH 2018-18].

7-I.C. UP-FRONT INCOME VERIFICATION (UIV)

Up-front income verification (UIV) refers to the GBHA's use of the verification tools available from independent sources that maintain computerized information about earnings and benefits. UIV will be used to the extent that these systems are available to the GBHA.

There may be legitimate differences between the information provided by the family and UIV-generated information. If the family disputes the accuracy of UIV data, no adverse action can be taken until the GBHA has independently verified the UIV information and the family has been granted the opportunity to contest any adverse findings through the GBHA's informal review/hearing processes. (For more on UIV and income projection, see section 6-I.C.)

Upfront Income Verification Using HUD's Enterprise Income Verification (EIV) System (Mandatory)

The GBHA must use HUD's EIV system in its entirety as a third-party source to verify tenant employment and income information during mandatory reexaminations or recertifications of family composition and income in accordance with 24 CFR 5.236 and administrative guidance issued by HUD. HUD's EIV system contains data showing earned income, unemployment benefits, social security benefits, and SSI benefits for participant families. The following policies apply to the use of HUD's EIV system.

EIV Income and IVT Reports

The data shown on income and income validation tool (IVT) reports is updated quarterly. Data may be between three and six months at the time reports are generated.

GBHA Policy

The GBHA will obtain income and IVT reports for annual re-examinations on a monthly basis. Reports will be generated as part of the regular re-examination process.

Income and IVT reports will be compared to family-provided information as part of the annual re-examination process. Income reports may be used in the calculation of annual income, as described in Chapter 6.I.C. Income reports may also be used to meet the regulatory requirement for third-party verification, as described above. Policies for resolving discrepancies between income- and IVT reports and family-provided information will be resolved as described in Chapter 6.I.C. and in this chapter.

Income and IVT reports will be used in interim re-examinations to identify any discrepancies between reported income and income shown in the EIV system, and as necessary to verify and calculate earned income, unemployment benefits, Social Security and/or SSI benefits. EIV will also be used to verify that families claiming zero income are not receiving income from any of these sources.

Income and IVT reports will be retained in resident files with the applicable annual or interim re-examination documents.

When the GBHA determines through EIV ~~income~~ reports and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 15, Program Integrity.

EIV Identity Verification

The EIV system verifies resident identities against SSA records. These records are compared to Public and Indian Housing Information Center (PIC) data for a match on Social Security number, name, and date of birth.

The GBHA is required to use EIV's *Identity Verification Report* on a monthly basis to improve the availability of income information in EIV [Notice PIH ~~2010~~2018-18~~3~~].

When identity verification for a resident fails, a message will be displayed within the EIV system and no income information will be displayed.

GBHA Policy

The GBHA will identify residents whose identity verification has failed by reviewing EIV's *Identity Verification Report* on a monthly basis.

The GBHA will attempt to resolve PIC/SSA discrepancies by obtaining appropriate documentation from the resident. When the GBHA determines that discrepancies exist due to GBHA errors such as spelling errors or incorrect birth dates, the errors will be corrected promptly.

Upfront Income Verification using Non-HUD Systems

In addition to mandatory use of the EIV system, HUD encourages the GBHA utilize other up-front verification sources.

GBHA Policy

The GBHA will inform all applicants and residents of its use of the following UIV resources during the admission and re-examination process:

State Systems for the Temporary Assistance for Needy Families (TANF) program

Credit Bureau Association (CBA) credit reports

Internal Revenue Service (IRS) tax transcript

Private sector databases

7-I.D. THIRD-PARTY WRITTEN AND ORAL VERIFICATION

HUD's current verification hierarchy defines two (2) types of written third-party verification. The more preferable form, "written third-party verification," consists of an original document generated by a third-party source, which may be received directly from a third-party source or provided to the GBHA by the family. If written third-party verification is not available, the GBHA must attempt to obtain a "written third-party verification form." This is a standardized form used to collect information from a third party.

Written Third-Party Verification [Notice PIH ~~2010~~2018-18~~9~~]
Written third-party verification documents must be original and authentic and may be supplied by the family or received from a third-party source.

Examples of acceptable tenant-provided documents include, but are not limited to: pay stubs, payroll summary reports, employer notice or letters of hire and termination, SSA benefit verification letters, bank statements, child support payment stubs, welfare benefit letters and/or printouts, and unemployment monetary benefit notices.

The GBHA is required to obtain, at a minimum, two current and consecutive pay stubs for determining annual income from wages.

The GBHA may reject documentation provided by the family if the document is not an original, if the document appears to be forged, or if the document is altered, mutilated, or illegible.

> GBHA Policy
> Third-party documents provided by the family must be dated within 60 days of the GBHA request date.
>
> If the GBHA determines that the third-party documents provided by the family are not acceptable, the GBHA will explain the reason to the family and request additional documentation.
>
> As verification of earned income, the GBHA will require the family to provide the two most current, consecutive pay stubs.

Written Third- Party Verification Form
When upfront verification is not available and the family is unable to provide written third-party documents, the GBHA must request a written third-party verification form. HUD's position is that this traditional third-party verification method presents administrative burdens and risks which may be reduced through the use of family-provided third-party documents.

The GBHA may mail, fax, or email third-party written verification form requests to third-party sources.

> GBHA Policy
> The GBHA will send third-party verification forms directly to the third party.
>
> Third-party verification forms will be sent when third-party verification documents are unavailable or are rejected by the GBHA.

Oral Third-Party Verification [Notice PIH ~~2010~~2018-18~~9~~]
For third-party oral verification, the GBHA will contact sources, identified by UIV techniques or by the family, by telephone or in person.

Oral third-party verification is mandatory if neither form of written third-party verification is available.

Third-party oral verification may be used when requests for written third-party verification forms have not been returned within a reasonable time—e.g., 10 business days.
The GBHA should document in the file the date and time of the telephone call or visit, the name of the person contacted, the telephone number, as well as the information confirmed.

> GBHA Policy
> In collecting third-party oral verification, GBHA staff will record in the family's file the name and title of the person contacted, the date and time of the conversation (or attempt), the telephone number used, and the facts provided.
>
> When any source responds verbally to the initial written request for verification the GBHA will accept the verbal response as oral verification but will also request that the source complete and return any verification forms that were provided.

When Third-Party Information is Not Required [Notice PIH ~~2010~~2018-18~~9~~]
Third-party verification may not be available in all situations. HUD has acknowledged that it may notb e cost-effective or reasonable to obtain third-party verification of income, assets, or expenses when these items would have a minimal impact on the family's total tenant payment.

> GBHA Policy
> If the family cannot provide original documents, the GBHA will pay the service charge required to obtain third-party verification, unless it is not cost effective in which case a self certification will be acceptable as the only means of verification. The cost of verification will not be passed on to the family.
>
> The cost of postage and envelopes to obtain third-party verification of income, assets, and expenses is not an unreasonable cost [VG, p.18].

Primary Documents
Third-party verification is not required when legal documents are the primary source, such as a birth certificate or other legal documentation of birth.

Imputed Assets
The GBHA may accept a self-certification from the family as a verification of assets disposed of for less than fair market value [HCV GB, p. 5-28].

> GBHA Policy
> The GBHA will accept a self-certification from a family as verification of assets disposed of for less than fair market value [HCV GB, p. 5-28].

7-I.E. SELF-CERTIFICATION
Self-certification, or "tenant declaration," is used as a last resort when the GBHA is unable to obtain third-party verification.

When the GBHA relies on a tenant declaration for verification of income, assets, or expenses, the family's file must be documented to explain why third-party verification was not available.

GBHA Policy
When information cannot be verified by a third party or by review of documents, family members will be required to submit self-certifications attesting to the accuracy of the information they have provided to the GBHA.

The GBHA may require a family to certify that a family member does not receive a particular type of income or benefit.

The self-certification must be made in a format acceptable to the GBHA and must be signed by the family member whose information or status is being verified. All self-certifications are highly recommended to be signed in the presence of a GBHA representative or GBHA notary public.

PART II: VERIFYING FAMILY INFORMATION

7-II.A. VERIFICATION OF LEGAL IDENTITY

GBHA Policy
The GBHA may require families to furnish verification of legal identity for each household member on an as-needed basis.

Legal identity will be verified on an as needed basis.

Verification of Legal Identity for Adults	Verification of Legal Identity for Children
Certificate of birth, naturalization papers	Certificate of birth
Church issued baptismal certificate	Adoption papers
Current, valid driver's license or Department of Motor Vehicle identification card	Custody agreement
U.S. military discharge (DD 214)	Health and Human Services ID
Current U.S. passport	Certified school records
Current employer identification card	

If a document submitted by a family is illegible for any reason or otherwise questionable, more than one of these documents may be required.

If none of these documents can be provided and at the GBHA's discretion, a third party who knows the person may attest to the person's identity. The certification must be provided in a format acceptable to the GBHA and be signed in the presence of a GBHA representative or GBHA notary public.

Legal identity will be verified for all applicants at the time of eligibility determination and in cases where the GBHA has reason to doubt the identity of a person representing him or herself to be a tenant or a member of a tenant family.

7-II.B. SOCIAL SECURITY NUMBERS [24 CFR 5.216 and ~~HCV, p.5-12~~Notice PIH 2018-24]
The family must provide documentation of a valid Social Security Number (SSN) for each member of the household, with the exception of individuals who do not contend eligible immigration status. Exemptions also include existing residents who were at least 62 years of age as of January 31, 2010, and had not previously disclosed an SSN.

The GBHA must accept the following documentation as acceptable evidence of the social security number:

An original SSN card issued by the Social Security Administration (SSA)

An original SSA-issued document, which contains the name and SSN of the individual

An original document issued by a federal, state, or local government agency, which contains the name and SSN of the individual

The GBHA may only reject documentation of an SSN provided by an applicant or resident if the document is not an original document, if the original document has been altered, mutilated, is illegible, or if the document appears to be forged.

GBHA Policy
The GBHA will explain to the applicant or resident the reasons the document is not acceptable and request that the individual obtain and submit acceptable documentation of the SSN to the GBHA within 90 days.

When a resident requests to add a new household member who is at least 6 years of age, or who is under the age of 6 and has an SSN, the resident must provide the complete and accurate SSN assigned to each new member at the time of reexamination or recertification, in addition to the documentation required to verify it. The GBHA may not add the new household member until such documentation is provided.

When the resident requests to add a new household member who is under the age of 6 and has not been assigned an SSN, the resident must provide the SSN assigned to each new child and the required documentation within 90 calendar days of the child being added to the household. A 90-day extension will be granted if the GBHA determines that the resident's failure to comply was due to unforeseen circumstances and was outside of the resident's control. During the period the GBHA is awaiting documentation of the SSN, the child will be counted as part of the assisted household.

GBHA Policy
The GBHA will grant one additional 90-day extension if needed for reasons beyond the resident's control such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency.

Social Security numbers must be verified only once during continuously-assisted occupancy.

GBHA Policy
The GBHA will verify each disclosed SSN by:

Obtaining documentation from applicants and residents that is acceptable as evidence of social security numbers

Making a copy of the original documentation submitted, returning it to the individual, and retaining a copy in the file folder

Once the individual's verification status is classified as "verified," the GBHA may, at its discretion, remove and destroy copies of documentation accepted as evidence of social security numbers. The retention of the EIV Summary Report or Income Report is adequate documentation of an individual's SSN.

GBHA Policy
Once an individual's status is classified as "verified" in HUD's EIV system, the GBHA will retain copies of documentation accepted as evidence of social security numbers in their individual secure files.

7-II.C. DOCUMENTATION OF AGE
A birth certificate or other official record of birth is the preferred form of age verification for all family members. For elderly family members an original document that provides evidence of the receipt of social security retirement benefits is acceptable.

GBHA Policy
If an official record of birth or evidence of social security retirement benefits cannot be provided, the GBHA will require the family to submit other documents that support the reported age of the family member (e.g., school records, driver's license if birth year is recorded) and to provide a self-certification.

Age must be verified only once during continuously-assisted occupancy.

7-II.D. FAMILY RELATIONSHIPS
Applicants and tenants are required to identify the relationship of each household member to the head of household. Definitions of the primary household relationships are provided in Chapter 3.

GBHA Policy
Family relationships are verified only to the extent necessary to determine a family's eligibility and level of assistance. Certification by the head of household normally is sufficient verification of family relationships.

Marriage

GBHA Policy
Certification by the head of household is normally sufficient verification. If the GBHA has reasonable doubts about a marital relationship, the GBHA will require the family to document the marriage.

A marriage certificate generally is required to verify that a couple is married.

Separation or Divorce

GBHA Policy

Certification by the head of household is normally sufficient verification. If the GBHA has reasonable doubts about divorce or separation, the GBHA will require the family to provide documentation of the divorce or separation.

A certified copy of a divorce decree, signed by a court officer, is required to document that a couple is divorced.

A copy of a court-ordered maintenance or other court record is required to document a separation.

If no court document is available, documentation from a community-based agency will be accepted.

Absence of Adult Member

GBHA Policy

If an adult member who was formerly a member of the household is reported to be permanently absent, the family must provide evidence to support that the person is no longer a member of the family (e.g., documentation of another address at which the person resides such as a lease or utility bill).

Foster Children and Foster Adults

GBHA Policy

Third-party verification from the state or local government agency responsible for the placement of the individual with the family is required.

7-II.E. VERIFICATION OF STUDENT STATUS

GBHA Policy

The GBHA requires families to provide information about the student status of all students who are 18 years of age or older. This information will be verified only if:

The family claims full-time student status for an adult other than the head, spouse, or co-head, or

The family claims a child care deduction to enable a family member to further his or her education

7-II.F. DOCUMENTATION OF DISABILITY

The GBHA must verify the existence of a disability in order to allow certain income disallowances and deductions from income. The GBHA is not permitted to inquire about the nature or extent of a person's disability [24 CFR 100.202(c)]. The GBHA may not inquire about a person's diagnosis or details of treatment for a disability or medical condition. If the GBHA receives a verification document that provides such information, the GBHA will not place this information in the tenant file. Under no circumstances will the GBHA request a resident's medical record(s). For more information on health care privacy laws, see the Department of Health and Human Services' website at www.os.dhhs.gov.

The GBHA may make the following inquiries, provided it makes them of all applicants, whether or not they are persons with disabilities [VG, p.24]:

- Inquiry into an applicant's ability to meet the requirements of ownership or tenancy
- Inquiry to determine whether an applicant is qualified for a dwelling available only to persons with disabilities or to persons with a particular type of disability
- Inquiry to determine whether an applicant for a dwelling is qualified for a priority available to persons with disabilities or to persons with a particular type of disability
- Inquiring whether an applicant for a dwelling is a current illegal abuser or addict of a controlled substance
- Inquiring whether an applicant has been convicted of the illegal manufacture or distribution of a controlled substance

Family Members Receiving SSA Disability Benefits
Verification of receipt of SSA benefits or SSI based upon disability is sufficient for verification of disability for the purpose of qualification for waiting list preferences or certain income disallowances and deductions [VG, p. 23].

> GBHA Policy
> For family members claiming disability who receive SSI or other disability payments from the SSA, the GBHA requests a current SSA benefit verification letter from each family member claiming disability status. If the family member is not ableto provide a copy of the benefit verification letter, the GBHA will attempt to obtain information about disability benefits through the HUD Enterprise Verification (EIV) system. If the documentation from HUD's EIV System is not available, the GBHA will ask the family to request a benefit verification letter by requesting it from www.ssa.gov. Once the applicant or resident receives the benefit verification letter they will be required to provide it to the GBHA.

Family Members Not Receiving SSA Disability Benefits
Receipt of veteran's disability benefits, worker's compensation, or other non-SSA benefits based on the individual's claimed disability are not sufficient verification that the individual meets HUD's definition of disability in 24 CFR 5.603, necessary to qualify for waiting list preferences or certain income disallowances and deductions.

> GBHA Policy
> For family members claiming disability who do not receive SSI or other disability payments from the SSA, the GBHA will accept a self-certification from the family members claiming a disability.

7-II.G. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS [24 CFR 5.508]

Overview
Housing assistance is not available to persons who are not citizens, nationals, or eligible immigrants. Prorated assistance is provided for "mixed families" containing both eligible and ineligible persons. See the Eligibility chapter for detailed discussion of eligibility requirements. This chapter (7) discusses HUD and GBHA verification requirements related to citizenship status.

The family must provide a certification that identifies each family member as a U.S. citizen, a U.S. national, an eligible noncitizen or an ineligible noncitizen and submit the documents discussed below for each family member. Once eligibility to receive assistance has been verified for an individual it need not be collected or verified again during continuously-assisted occupancy [24 CFR 5.508(g)(5)].

U.S. Citizens and Nationals
HUD requires a declaration for each family member who claims to be a U.S. citizen or national. The declaration must be signed personally by a family member 18 or older and by a guardian for minors.

The GBHA may request verification of the declaration by requiring presentation of a birth certificate, United States passport or other appropriate documentation.

> <u>GBHA Policy</u>
> Family members who claim U.S. citizenship or national status will not be required to provide additional documentation unless the GBHA receives information indicating that an individual's declaration may not be accurate.

Eligible Immigrants

Documents Required
All family members claiming eligible immigration status must declare their status in the same manner as U.S. citizens and nationals.

The documentation required for eligible noncitizens varies depending upon factors such as the date the person entered the U.S., the conditions under which eligible immigration status has been granted, age, and the date on which the family began receiving HUD-funded assistance. Exhibit 7-2 at the end of this chapter summarizes documents family members must provide.

PHA Verification [HCV GB, pp5-3 and 5-7]
For family members age 62 or older who claim to be eligible immigrants, proof of age is required in the manner described in 7-II.C. of this ACOP. No further verification of eligible immigration status is required.

For family members under the age of 62 who claim to be eligible immigrants, the PHA must verify immigration status with the U.S. Citizenship and Immigration Services (USCIS).

The GBHA will follow all USCIS protocols for verification of eligible immigration status.

7-II.H. VERIFICATION OF PREFERENCE STATUS
The GBHA must verify any preferences claimed by an applicant that determined his or her placement on the waiting list.

> <u>GBHA Policy</u>
> The GBHA offers a preference for working families, described in Section 4-III.B.
>
> The GBHA may verify that the family qualifies for the working family preference based on the family's submission of the working member's most recent paycheck stub indicating that the working member works at least 20 hours per week. The paycheck stub must have been issued to the working member within the last 30 days.
>
> The GBHA may also seek third party verification from the employer of the head, spouse, co-head, or sole member of a family requesting a preference as a working family.

PART III: VERIFYING INCOME AND ASSETS

Chapter 6, Part I of this ACOP describes in detail the types of income that are included and excluded and how assets and income from assets are handled. Any assets and income reported by the family must be verified. This part provides PHA policies that supplement the general verification procedures specified in Part I of this chapter.

7-III.A. EARNED INCOME

Tips

GBHA Policy

Unless tip income is included in a family member's W-2 by the employer, persons who work in industries where tips are standard will be required to sign a certified estimate of tips received for the prior year and tips anticipated to be received in the coming year.

Wages

GBHA Policy

For wages other than tips, the family must provide originals of at least~~the~~ three~~two~~ most current, consecutive pay stubs.

7-III.B. BUSINESS AND SELF EMPLOYMENT INCOME

GBHA Policy

Business owners and self-employed persons will be required to provide one of the following:

An audited financial statement for the previous fiscal year if an audit was conducted. If an audit was not conducted, a statement of income and expenses must be submitted and the business owner or self-employed person must certify to its accuracy.

All schedules completed for filing federal and local taxes in the preceding year.

If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules.

The GBHA will provide a format for any person who is unable to provide such a statement to record income and expenses for the coming year. The business owner/self-employed person will be required to submit the information requested and to certify to its accuracy at all future re-examinations.

At any re-examination the GBHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.

If a family member has been self-employed less than three (3) months, the GBHA will accept the family member's certified estimate of income and may schedule an interim re-examination in three (3) months. If the family member has been self-employed for three (3) to twelve (12) months, the GBHA will require the family to provide documentation of income and expenses for this period and use that information to project income.

7-III.C. PERIODIC PAYMENTS AND PAYMENTS IN LIEU OF EARNINGS

Social Security/SSI Benefits

GBHA Policy

To verify the SS/SSI benefits of applicants, the GBHA will request a current (dated within the last 60 days) SSA benefit verification letter from each family member that receives social security benefits. If the family is unable to provide the document(s), the GBHA will help the applicant request a benefit verification letter from SSA's website at www.socialsecurity.gov. Once the family has received the original benefit verification letter, it will be required to provide the letter to the GBHA.

To verify the SS/SSI benefits of residents, the GBHA will obtain information about social security/SSI benefits through HUD's EIV system, and confirm with the resident(s) that the current listed benefit amount is correct. If the resident disputes the EIV-reported benefit amount, or if benefit information is not available in HUD systems, the GBHA will request a current SSA benefit verification letter from each family member that receives Social Security benefits. If the family is unable to provide the document(s) the GBHA will help the applicant request a benefit verification letter from SSA's website at www.socialsecurity.gov. Once the resident has received the benefit verification letter they will be required to provide it to the GBHA.

7-III.D. ALIMONY OR CHILD SUPPORT

GBHA Policy

The methods the GBHA will use to verify alimony and child support payments differ depending on whether the family declares that it receives regular payments.

If the family declares that it receives regular payments, verification will be obtained in the following order of priority:

Copies of the receipts and/or payment stubs for the 60 days prior to GBHA request

Third-party verification form from the state or local child support enforcement agency

Third-party verification form from the person paying the support

Family's self-certification of amount received

If the family declares that it receives irregular or no payments, in addition to the verification process listed above, the family must provide evidence that it has taken all reasonable efforts to collect amounts due. This may include:

A statement from any agency responsible for enforcing payment that shows the family has requested enforcement and is cooperating with all enforcement efforts

If the family has made independent efforts at collection, a written statement from the attorney or other collection entity that has assisted the family in these efforts

Note: Families are not required to undertake independent enforcement action.

7-III.E. ASSETS AND INCOME FROM ASSETS

Assets Disposed of for Less than Fair Market Value

The family must certify whether any assets have been disposed of for less than fair market value in the preceding two years. The GBHA needs to verify only those certifications that warrant documentation [HCV GB, p.5-28].

GBHA Policy

The GBHA will verify the value of assets disposed of only if:

The GBHA does not already have a reasonable estimation of its value from previously collected information, or

The amount reported by the family in the certification appears obviously in error.

> Example 1: An elderly resident reported a $10,000 certificate of deposit at the last annual re-examination and the GBHA verified this amount. Now the person reports that she has given this $10,000 to her son. The GBHA has a reasonable estimate of the value of the asset; therefore, re-verification of the value of the asset is not necessary.
>
> Example 2: A family member has disposed of its ¼ share of real property located in a desirable area and has valued her share at approximately $5,000. Based upon market conditions, this declaration does not seem realistic. Therefore, the GBHA will verify the value of this asset.

7-III.F. NET INCOME FROM RENTAL PROPERTY

GBHA Policy

The family must provide:

A current executed lease for the property that shows the rental amount or certification from the current tenant

A self-certification from the family members engaged in the rental of property providing an estimate of expenses for the coming year and the most recent IRS Form 1040 with Schedule E (Rental Income). If schedule E was not prepared, the GBHA will require the family members involved in the rental of property to provide a self-certification of income and expenses for the previous year and may request documentation to support the statement including: tax statements, insurance invoices, bills for reasonable maintenance and utilities, and bank statements or amortization schedules showing monthly interest expense.

7-III.G. RETIREMENT ACCOUNTS

GBHA Policy

The GBHA will accept written third-party documents supplied by the family as evidence of the status of retirement accounts.

The type of original document that will be accepted depends upon the family member's retirement status.

Before retirement, the GBHA will accept an original document from the entity holding the account with a date that shows it is the most recently scheduled statement for the account but in no case earlier than 6 months from the effective date of the examination.

Upon retirement, the GBHA will accept an original document from the entity holding the account that reflects any distributions of the account balance, any lump sums taken and any regular payments.

After retirement, the GBHA will accept an original document from the entity holding the account dated no earlier than 12 months before that reflects any distributions of the account balance, any lump sums taken and any regular payments.

7-III.H. INCOME FROM EXCLUDED SOURCES
A detailed discussion of excluded income is provided in Chapter 6, Part I.

HUD guidance on verification of excluded income draws a distinction between income which is fully excluded and income which is only partially excluded.

For fully excluded income, the GBHA is not required to follow the verification hierarchy, document why third-party verification is not available, or report the income on the 50058. Fully excluded income is defined as income that is entirely excluded from the annual income determination (for example, food stamps, earned income of a minor, or foster care funds) [Notice PIH 2013-04].

The GBHA may accept a family's signed application or reexamination form as self-certification of fully excluded income. They do not have to require additional documentation. However, if there is any doubt that source of income qualifies for full exclusion, the GBHA has the option of requiring additional verification.

For partially excluded income, the GBHA is required to follow the verification hierarchy and all applicable regulations, and to report the income on the 50058. Partially excluded income is defined as income where only a certain portion of what is reported by the family qualifies to be excluded and the remainder is included in annual income (for example, the income of an adult full-time student, or income excluded under the earned income disallowance).

<u>GBHA Policy</u>
The GBHA will accept the family's self-certification as verification of fully excluded income. The GBHA may request additional documentation if necessary to document the income source.

The GBHA will verify the source and amount of partially excluded income as described in Part 1 of this chapter.

7-III.I. ZERO ANNUAL INCOME STATUS

GBHA Policy
The GBHA will check UIV sources and/or request information from third-party sources to verify that certain forms of income such as unemployment benefits, TANF, SS, SSI, earned income etc. are not being received by families claiming zero annual income.

PART IV: VERIFYING MANDATORY DEDUCTIONS

7-IV.A. DEPENDENT AND ELDERLY/DISABLED HOUSEHOLD DEDUCTIONS

The dependent and elderly/disabled family deductions require only that the GBHA verify that the family members identified as dependents or elderly/disabled persons meet the statutory definitions. No further verifications are required.

Dependent Deduction
See Chapter 6 (6-II.B.) for a full discussion of this deduction. The GBHA will verify that:

- Any person under the age of 18 for whom the dependent deduction is claimed is not the head, spouse, or co-head of the family and is not a foster child
- Any person age 18 or older for whom the dependent deduction is claimed is not a foster adult or live-in aide, and is a person with a disability or a full-time student

Elderly/Disabled Family Deduction
See the Eligibility chapter for a definition of elderly and disabled families and Chapter 6 (6-II.C.) for a discussion of the deduction. The GBHA will verify that the head, spouse, or co-head is 62 years of age or older or a person with disabilities.

7-IV.B. MEDICAL EXPENSE DEDUCTION

The policies related to medical expenses are found in 6-II.D. The standard verification policies found in Part I of this chapter apply to the verification of medical expenses.

Amount of Expense

GBHA Policy
Medical expenses will be verified through:

Written third-party documents provided by the family, such as pharmacy printouts or receipts.

The GBHA will make a best effort to determine what expenses from the past are likely to continue to occur in the future. The GBHA will also accept evidence of monthly payments or total payments that will be made for medical expenses during the upcoming 12 months.

Written third-party verification forms, if the family is unable to provide acceptable documentation.

Written family certification as to costs anticipated to be paid during the upcoming 12 months

In addition, the GBHA must verify that:

- The household is eligible for the deduction
- The costs to be deducted are qualified medical expenses
- The expenses are not paid for or reimbursed by any other source
- Costs incurred in past years are counted only once

Eligible Household

The medical expense deduction is permitted only for households in which the head, spouse, or co-head is at least 62 or a person with disabilities. The GBHA will verify that the family meets the definition of an elderly or disabled family provided in the Eligibility chapter, and as described in Chapter 7 (7-IV.A) of this plan.

Qualified Expenses

To be eligible for the medical expenses deduction, the costs must qualify as medical expenses. See Chapter 6 (6-II.D.) for the GBHA's policy on what counts as a medical expense.

Unreimbursed Expenses

To be eligible for the medical expenses deduction, the costs must not be reimbursed by another source.

GBHA Policy

The family will be required to certify that the medical expenses are not paid or reimbursed to the family from any other source. If expenses are verified through a third party, the third party must certify that the expenses are not paid or reimbursed from any other source.

Expenses Incurred in Past Years

GBHA Policy

When anticipated costs are related to on-going payment of medical bills incurred in past years, the GBHA will verify:

The anticipated repayment schedule

The amounts paid in the past, and

Whether the amounts to be repaid have been deducted from the family's annual income in past years

7-IV.C. DISABILITY ASSISTANCE EXPENSES

Policies related to disability assistance expenses are found in 6-II.E. The amount of the deduction will be verified following the standard verification procedures described in Part I.

Amount of Expense

The deduction for disability assistance expenses covers both attendant care and auxiliary apparatus. Because one is a care provider and the other is generally a piece of equipment or the servicing of that equipment, the policy for verifying amounts for attendant care will be somewhat different than for auxiliary apparatus. The standard verification policies found in Part I of this chapter apply to the verification of disability assistance expenses.

Attendant Care

GBHA Policy
The GBHA will accept written third-party documents provided by the family.

If family-provided documents are not available, the GBHA will provide a third-party verification form directly to the care provider requesting the needed information.
Expenses for attendant care will be verified through:

Written third-party documents provided by the family, such as receipts or cancelled checks

Third-party verification form signed by the provider, if family-provided documents are not available

If third-party or document review is not possible, written family certification as to costs anticipated to be incurred for the upcoming 12 months

Auxiliary Apparatus

GBHA Policy
Expenses for auxiliary apparatus will be verified through:

Written third-party documents provided by the family, such as billing statements for purchase of auxiliary apparatus, or other evidence of monthly payments or total payments that will be due for the apparatus during the upcoming 12 months.

Third-party verification form signed by the provider, if family-provided documents are not available

If third-party or document review is not possible, written family certification of estimated apparatus costs for the upcoming 12 months

In addition, the GBHA must verify that:

- The family member for whom the expense is incurred is a person with disabilities (as described in 7-II.F above).
- The expense permits a family member, or members, to work (as described in 6-II.E.).
- The expense is not reimbursed from another source (as described in 6-II.E.).

Family Member is a Person with Disabilities
To be eligible for the disability assistance expense deduction, the costs must be incurred for attendant care or auxiliary apparatus expense associated with a person with disabilities. The GBHA will verify that the expense is incurred for a person with disabilities (See 7-II.F.).

Family Member(s) Permitted to Work
The GBHA must verify that the expenses claimed actually enable a family member, or members, (including the person with disabilities) to work.

GBHA Policy
The GBHA will request third-party verification from a rehabilitation agency or knowledgeable medical professional indicating that the person with disabilities requires attendant care or an auxiliary apparatus to be employed, or that the attendant care or auxiliary apparatus enables another family member, or members, to work (See 6-II.E.). This documentation may be provided by the family.

If third-party verification has been attempted and is either unavailable or proves unsuccessful, the family must certify that the disability assistance expense frees a family member, or members (possibly including the family member receiving the assistance), to work.

Unreimbursed Expenses
To be eligible for the disability expenses deduction, the costs must not be reimbursed by another source.

GBHA Policy
The family will be required to certify that attendant care or auxiliary apparatus expenses are not paid by or reimbursed to the family from any other source.

7-IV.D. CHILD CARE EXPENSES
Policies related to child care expenses are found in Chapter 6 (6-II.F). The amount of the deduction will be verified following the standard verification procedures described in Part I. In addition, the GBHA must verify that:

- The child is eligible for care (12 or younger)
- The costs claimed are not reimbursed
- The costs enable a family member to work, actively seek work, or further their education
- The costs are for an allowance type of child care
- The costs are reasonable

Eligible Child
To be eligible for the child care deduction, the costs must be incurred for the care of a child under the age of 13. The GBHA will verify that the child being cared for (including foster children) is under the age of 13 (See 7-II.C.).

Unreimbursed Expense
To be eligible for the child care deduction, the costs must not be reimbursed by another source.

GBHA Policy
The family and the care provider will be required to certify that the child care expenses are not paid by or reimbursed to the family from any other source.

Pursuing an Eligible Activity
The GBHA must verify that the family member(s) that the family has identified as being enabled to seek work, pursue education, or be gainfully employed, are actually pursuing those activities.

GBHA Policy
Information to be Gathered

The GBHA will verify information about how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the time required for study (for students), the relationship of the family member(s) to the child, and any special needs of the child that might help determine which family member is enabled to pursue an eligible activity.

Seeking Work
Whenever possible the GBHA will use documentation from a state or local agency that monitors work-related requirements (e.g., welfare or unemployment). In such cases, the GBHA will request verification from the agency of the member's job seeking efforts to date and require the family to submit to the GBHA any reports provided to the other agency.

In the event third-party verification is not available, the GBHA will provide the family with a form on which the family member must record job search efforts. The GBHA will review this information at each subsequent re-examination for which this deduction is claimed.

Furthering Education
The GBHA will require a self certification verifying that the person permitted to further his or her education by the child care is enrolled and provide information about the timing of classes for which the person is registered.

Gainful Employment
The GBHA will seek third-party verification of the work schedule of the person who is permitted to work by the child care. In cases in which two (2) or more family members could be permitted to work, the work schedules for all relevant family members may be verified. The documentation may be provided by the family.

Allowable Type of Child Care
The type of care to be provided is determined by the family, but must fall within certain guidelines, as discussed in Chapter 6.

GBHA Policy
The GBHA will verify that the type of child care selected by the family is allowable, as described in Chapter 6 (6-II.F.).

The GBHA will verify that the fees paid to the child care provider cover only child care costs (e.g., no housekeeping services or personal services) and are paid only for the care of an eligible child (e.g., prorate costs if some of the care is provided for ineligible family members).

The GBHA will verify that the child care provider is not an assisted family member. Verification will be made through the head of household's declaration of family members who are expected to reside in the unit.

Reasonableness of Expenses
Only reasonable child care costs can be deducted.

GBHA Policy
The actual costs the family incurs will be compared with the GBHA's established standards of reasonableness for the type of care in the locality to ensure that the costs are reasonable.

If the family presents a justification for costs that exceed typical costs in the area, the GBHA will request additional documentation, as required, to support a determination that the higher cost is appropriate.

EXHIBIT 7-1: Excerpt from HUD Verification Guidance Notice (PIH 2004-01, pp.11-14)

Upfront (UIV)	Highest (Highly Recommended, highest level of third party verification)
Written 3rd Party	High (Mandatory if upfront income verification is not available or if UIV data differs substantially from tenant-reported information)
Oral 3rd Party	Medium (Mandatory if written third party verification is not available)
Document Review	Medium-Low (Use on provisional basis)
Tenant Declaration	Low (Use as a last resort)

Income Type	Upfront	Written Third Party	Oral Third Party	Document Review	Tenant Declaration
	(LEVEL 5)	(LEVEL 4)	(LEVEL 3)	(LEVEL 2)	(LEVEL 1)
Wage/Salaries	Use of computer matching agreements with a State Wage Information Collection Agency (SWICA) to obtain wage information electronically, by mail or fax or in person.	The GBHA mails, faxes, or e-mails a verification form directly to the independent sources to obtain wage information.	In the event the independent source does not respond to the GBHA's written request for information, the GBHA may contact the independent source by phone or make an in-person visit to obtain the requested information.	When neither form of third-party verification can be obtained, the GBHA may accept original documents such as consecutive pay stubs (HUD recommends the GBHA review at least three months of pay stubs, if employed by the same employer for three months or more), W-2 forms, etc. from the tenant. Note: The GBHA must document in the tenant file, the reason third-party verification was not available.	The GBHA may accept a notarized statement or affidavit from the tenant that declares the family's total annual income from earnings. Note: the GBHA must document in the tenant file, the reason third-party verification was not available.
	Agreements with private vendor agencies, such as The Work Number or ChoicePoint to obtain wage and salary information.	The GBHA may have the tenant sign a Request for Earnings Statement from the SSA to confirm past earnings. The GBHA mails the form to SSA and the statement will be sent to the address the GBHA specifies on the form.			
	Use of HUD systems, when available.				

Verification of Employment Income: The GBHA should always obtain as much information as possible about the employment, such as start date (new employment), termination date (previous employment), pay frequency, pay rate, anticipated pay increases in the next twelve months, year-to-date earnings, bonuses, overtime, company name, address and telephone number, name and position of the person completing the employment verification form.
Effective Date of Employment: The GBHA should always confirm start and termination dates of employment.

Income Type	Upfront (LEVEL 5)	Written Third Party (LEVEL 4)	Oral Third Party (LEVEL 3)	Document Review (LEVEL 2)	Tenant Declaration (LEVEL 1)
Self-Employment	Not Available	The GBHA mails or faxes a verification form directly to sources identified by the family to obtain income information.	The GBHA may call the source to obtain income information	The GBHA may accept any documents (i.e. tax returns, invoices, and letters from customers) provided by the tenant to verify self-employment income. Note: The GBHA must document in the tenant file, the reason third-party verification was not obtained.	The GBHA may accept a notarized statement or affidavit from the tenant that declares the family's total annual income from self-employment. Note: The GBHA must document in the tenant file, the reason third-party verification was not available.
Verification of Self-Employment Income: Typically, it is a challenge for PHAs to obtain third-party verification of self-employment income. When third-party verification is not available, the GBHA should always request a notarized tenant declaration that includes a perjury statement.					
Social Security Benefits	Use of HUD Tenant Assessment System (TASS) to obtain current benefit history and discrepancy reports.	The GBHA mails or faxes a verification form directly to the local SSA office to obtain social security benefit information. **(Not Available in some areas because SSA makes this data available through TASS. SSA encourages PHAs to use TASS.)**	The GBHA may call SSA, with the tenant on the line, to obtain current benefit amount. **(Not Available in some areas because SSA makes this data available through TASS. SSA encourages PHAs to use TASS.)**	The GBHA may accept an original SSA Notice from the tenant. Note: The GBHA must document in the tenant file, the reason third-party verification was not available.	The GBHA may accept a notarized statement or affidavit from the tenant that declares monthly social security benefits. Note: The GBHA must document in the tenant file, the reason third-party verification was not available.
Welfare Benefits	Use of computer matching agreements with the local Social Services Agency to obtain current benefit amount electronically, by mail or fax or in person.	The GBHA mails, faxes, or e-mails a verification form directly to the local Social Security Services Agency to obtain welfare benefit information.	The GBHA may call the local Social Services Agency to obtain current benefit amount.	The GBHA may review an original award notice or printout from the local Social Services Agency provided by the tenant. Note: The GBHA must document in tenant file, the	The GBHA may accept a notarized statement or affidavit from the tenant that declares monthly welfare benefits.

				reason third-party verification was not available.	
Income Type	Upfront (LEVEL 5)	Written Third Party (LEVEL 4)	Oral Third Party (LEVEL 3)	Document Review (LEVEL 2)	Tenant Declaration (LEVEL 1)
Child Support	Use of agreement with the local Child Support Enforcement Agency to obtain current child support amount and payment status electronically, by mail or fax or in person.	The GBHA mails, faxes, or e-mails a verification form directly to the local Child Support Enforcement Agency or child support payer to obtain current child support amount and payment status.	The GBHA may sell the local Child Support Enforcement Agency or child support payer to obtain current child support amount and payment status.	The GBHA may review an original court order, notice or printout from the local Child Support Enforcement Agency provided by the tenant to verify current child support amount and payment status. Note: The GBHA must document in the tenant file, the reason third party verification was not available.	The GBHA may accept a notarized statement or affidavit from the tenant that declares current child support amount and payment status. Note: The GBHA must document in the tenant file, the reason third-party verification was not available.
Unemployment Benefits	Use of computer matching agreements with a State Wage Information Collection Agency to obtain unemployment compensation electronically, by mail or fax or in person. Use of HUD systems, when available.	The GBHA mails, faxes, or e-mails a verification form directly to the State Wage Information Collection Agency to obtain unemployment compensation information.	The GBHA may call the State Wage Information Collection Agency to obtain current benefit amount.	The GBHA may review an original benefit notice or unemployment check stub, or printout from the local State Wage Information Collection Agency provided by the tenant. Note: The GBHA must document in the tenant file the reason third-party verification was not available.	The GBAH may accept a notarized statement or affidavit from the tenant that declares unemployment benefits. Note: The GBHA must document in the tenant file, the reason third-party verification was not available.
Pensions	Use of computer matching agreements with a Federal, State, or Local Government Agency to obtain pension information electronically, by	The GBHA mails, faxes, or e-mails a verification form directly to the pension provider to obtain pension information.	The GBHA may call the pension provider to obtain current benefit amount.	The GBHA may review an original benefit notice from the pension provider provided by the tenant. Note: The GBHA must document in the tenant file, the	The GBHA may accept a notarized statement or affidavit from the tenant that declares monthly pension amounts.

	mail or fax or in person.			reason third-party verification was not available.	

Income Type	Upfront (LEVEL 5)	Written Third Party (LEVEL 4)	Oral Third Party (LEVEL 3)	Document Review (LEVEL 2)	Tenant Declaration (LEVEL 1)
Assets	Use of cooperative agreements with sources to obtain asset and asset income information electronically, by mail or fax or in person.	The GBHA mails, faxes, or e-mails a verification form directly to the source to obtain asset and asset income information.	The GBHA may call the source to obtain asset and asset income information.	The GBHA may review original documents provided by the tenant. Note: The GBHA must document in the tenant file, the reason third-party verification was not available.	The GBHA may accept a notarized statement or affidavit from the tenant that declares assets and asset income. Note: The GBHA must document in the tenant file, the reason third-party verification was not available.
Comments	Whenever HUD makes available wage, unemployment, and SSA information, the GBHA should use the information as part of the re-examination process. Failure to do so may result in disallowed costs during a RIM review.	Note: The independent source completes the form and returns the form directly to the GBHA. The tenant should not hand carry documents to or from the independent source.	The GBHA should document in the tenant file, the date and time of the telephone call or in person visit, along with the name and title of the person that verified the current income amount.		The GBHA should use this verification method as a last resort, when all other verification methods are not possible or have been unsuccessful. **Notarized statement should include a perjury penalty statement.**
Note: The GBHA must not pass verification costs along to the participant. Note: In cases where the GBHA cannot reliably project annual income, the GBHA may elect to complete regular interim re-examinations (this policy should be a part of the GBHA's written policies.)					

Exhibit 7-2: Summary of Documentation Requirements for Noncitizens
[HCV GB, pp.5-9 and 5-10]

<table>
<tr><td colspan="2">
• All noncitizens claiming eligible status must sign a declaration of eligible immigrant status on a form acceptable to the GBHA.
• Except for persons 62 or older, all noncitizens must sign a verification consent form
• Additional documents are required based upon the person's status.
</td></tr>
<tr><td colspan="2">
Elderly Noncitizens
• A person 62 years of age or older who claims eligible immigration status also must provide proof of age such as birth certificate, passport, or documents showing receipt of SS old-age benefits.
</td></tr>
<tr><td colspan="2">
All other Noncitizens
• Noncitizens that claim eligible immigration status also must present the applicable USCIS document.
</td></tr>
<tr><td>
• Form I-551 Alien Registration Receipt Card (for permanent resident aliens)
• Form I-94 Arrival-Departure Record annotated with one of the following:
o "Admitted as a Refugee Pursuant to Section 207"
o "Section 208" or "Asylum"
o "Section 243(h)" or "Deportation stayed by Attorney General"
o "Paroled Pursuant to Section 221 (d)(5) of the USCIS"
</td><td>
• Form I-94 Arrival-Departure Record with no annotation accompanied by:
o A final court decision granting asylum (but only if no appeal is taken);
o A letter from a USCIS asylum officer granting asylum (if application is filed on or after 10/1/90) or from a USCIS district director granting asylum (application filed before 10/1/90);
o A court decision granting withholding of deportation; or
o A letter from an asylum officer granting withholding or deportation (if application filed on or after 10/1/90)
</td></tr>
<tr><td>
• For I-688 Temporary Resident Car annotated "Section 245A" or "Section 210".
</td><td>
Form I-688B Employment Authorization Card annotated "Provision of Law 274a. 12(11)" or "Provision of Law 274a.12".
</td></tr>
<tr><td colspan="2">
• A receipt issued by the USCIS indicating that an application for issuance of a replacement document in one of the above listed categories has been made and the applicant's entitlement to the document has been verified; or
• Other acceptable evidence. If other documents are determined by the USCIS to constitute acceptable evidence of eligible immigration status, they will be announced by notice published in the Federal Register.
</td></tr>
</table>

Report to the
Housing Authority of the City of Green Bay

MEETING DATE	PREPARED BY
October 17, 2019	Jayme Valentine, Staff

AGENDA ITEM # D.6.

Consideration with possible action to amend Chapter 8 - (Leasing and Inspections) of the Admissions and Continued Occupancy Plan.

BACKGROUND

New updates were announced by the Department of Housing and Urban Development which the Green Bay Housing Authority is requesting to adopt.

Key changes include the adoption of the smoke free policy, minimum heating standards, security deposit requirements and updates to inspection policies/practices.

RECOMMENDATION

Staff is recommending approval to amend Chapter 8 - (Leasing and Inspections) of the Admissions and Continued Occupancy Plan.

FISCAL IMPACT

ATTACHMENTS

1. Chapter 8- Leasing & Inspections REVISED

Chapter 8
LEASING AND INSPECTIONS
[24 CFR 5, Subpart G; 24 CFR 966, Subpart A]

INTRODUCTION
Public housing leases are the contractual basis of the legal relationship between the GBHA and the tenant. All units must be occupied pursuant to a dwelling lease agreement that complies with HUD regulations.

HUD regulations require the GBHA to inspect each dwelling unit prior to move-in, at move-out, and annually during the period of occupancy. In addition, the GBHA may conduct additional inspections in accordance with GBHA policy.

This chapter is divided into two parts as follows:

Part I: Leasing. This part describes pre-leasing activities and the GBHA's policies pertaining to lease execution, lease modification, and payments under the lease.

Part II: Inspections. This part describes the GBHA's policies for inspecting dwelling units.

PART I: LEASING

8-I.A. OVERVIEW
An eligible family may occupy a public housing dwelling unit under the terms of a lease. The lease must meet all regulatory requirements, and must also comply with applicable state and local laws and codes.

The term of the lease must be for a period of 12 months. The least must be renewed automatically for another 12-month term, except that the GBHA may not renew the lease if the family has violated the community service requirement [24 CFR 966.4(a)(2)].

PHAs must adopt smoke-free policies, which must be implemented no later than July 30, 2018. The policy is attached as Exhibit 8-1.

PHAs must include in the ACOP residential minimum heating standards policies [Notice PIH 2018-19]. The policy is included in Part I of this chapter.

Part I of this chapter contains regulatory information on leasing, where applicable, as well as the GBHA's leasing policies.

8-I.B. LEASE ORIENTATION

GBHA Policy
After unit acceptance but prior to occupancy, a GBHA representative will conduct a lease orientation with the family. The head of household or spouse is required to attend.

Orientation Agenda

GBHA Policy

When families attend the lease orientation, they will be provided with:

A copy of the lease

A copy of the GBHA's grievance procedure

A copy of the house rules, including non-standard rental provisions

A copy of the GBHA's schedule of maintenance charges
Move-out instructions

Move-in checklist

Rental agreement addendum/prorated rental agreement addendum

Resident income certification

Lead-based paint disclosures and acknowledgements addendum

Community Service requirement

Family obligation addendum

Smoke detector policy

Pest control addendum

Bed bug addendum

Parking addendum

Barbeque policy

Garbage policy

Rent election addendum

A copy of the GBHA Pet Policy

A copy of "Is Fraud Worth It?" (form HUD-1141-OIG), which explains the types of actions a family must avoid and the penalties for program abuse

A copy of "What You Should Know about EIV," a guide to the Enterprise Income Verification (EIV) system published by HUD, as an attachment to Notice PIH 2010-19

A copy of "How Your Rent is Determined" fact sheet

Information about the protections afforded by the Violence against Women Reauthorization Act of 2013 (VAWA) to victims of domestic violence, dating violence, sexual assault and stalking (see section 16-VII.C)

Topics to be discussed and explained to all families include:

Applicable deposits and all other charges

Homelessness at admission

Review and explanation of lease provisions

Unit maintenance requests and work orders

Proper electronic appliance disposal

The GBHA's interim reporting requirements

Review and explanation of occupancy forms

Community service requirements

Family choice of rent

VAWA protections

Smoke-free policy

8-I.C. EXECUTION OF LEASE
The lease must be executed by the tenant and the GBHA, except for automatic renewals of a lease [24 CFR 966.4(a)(3)].

A lease is executed at the time of admission for all new residents. A new lease is also executed at the time of transfer from one GBHA unit to another.

The least must state the composition of the household as approved by the GBHA (family members and any GBHA-approved live-in aide) [24 CFR 966.4(a)(1)(v)]. See Section 8-I.D. for policies regarding changes in family composition during the lease term.

GBHA Policy
The head of household, spouse, or co-head, and all other adult members of the household will be required to sign the public housing lease prior to occupancy. An appointment will be scheduled for the parties to execute the lease. The head of household will be provided a copy of the executed lease and the GBHA will retain a copy in the resident's file.

Files for households that include a live-in aide will contain file documentation signed by the live-in aide, that the live-in aide is not a party to the lease and is not entitled to the GBHA assistance. The live-in aide is only approved to live in the unit while serving as the care attendant for the family member who requires the care.

8-I.D. MODIFICATIONS TO THE LEASE
The lease may be modified at any time by written agreement of the tenant and the GBHA [24 CFR 966.4(a)(3)].

Modification to the Lease Form
The GBHA may modify its lease from time to time. However, the GBHA must give residents at least thirty (30) days advance notice of the proposed changes and an opportunity to comment on the changes. The GBHA must also consider any comments before formally adopting a new lease [24 CFR 966.3].

After proposed changes have been incorporated into the lease and approved by the Board, each family must be notified at least 60 days in advance of the effective date of the new lease or lease revision. A resident's refusal to accept permissible and reasonable lease modifications that are made in accordance with HUD requirements, or are required by HUD, is grounds for termination of tenancy [24 CFR 966.4(1)(2)(iii)(E)].

> GBHA Policy
> The family will have 30 days to accept the revised lease. If the family does not accept the offer of the revised lease within that 30 day timeframe, the family's tenancy will be terminated for other good cause in accordance with the policies in Chapter 13.

Schedules of special charges and rules and regulations are subject to modification or revision. Because these schedules are incorporated into the lease by reference, residents and resident organizations must be provided at least thirty days written notice of the reason(s) for any proposed modifications or revisions, and must be given opportunity to present written comments. The notice must be delivered directly or mailed to each tenant; or posted in at least three conspicuous places within each structure or building in which the affected dwelling units are located, as well as in a conspicuous place at the project office, if any, or if none, a similar central business location within the project. Comments must be taken into consideration before any proposed modifications or revisions become effective [24 CFR 966.5].

After the proposed revisions become effective they must be publicly posted in a conspicuous manner in the project office and must be furnished to applicants and tenants on request [24 CFR 966.5].

> GBHA Policy
> When the GBHA proposes to modify or revise schedules of special charges or rules and regulations, the GBHA will post a copy of the notice in the central office, and will mail a copy of the notice to each resident family. Documentation of proper notice will be included in each resident file.

Other Modifications

> GBHA Policy
> The lease will be amended to reflect all changes in family composition.
>
> If, for any reason, any member of the household ceases to reside in the unit, the lease will be amended by drawing a line through the person's name. The head of household and GBHA will be required to initial and date the change.
>
> If a new household member is approved by the GBHA to reside in the unit, the person's name and birth date will be added to the lease. The head of household and GBHA will be required to

initial and date the change. If the new member of the household is an adult, s/he will also be required to sign and date the lease.

Policies governing when and how changes in family composition must be reported are contained in Chapter 9, Re-examinations.

If a family's composition changes and therefore requires a different unit size, the GBHA reserves the right to utilize its discretion in determining whether the family may continue to reside in the current unit or be moved to a new unit. In all circumstances, the resident family will receive the new unit before an applicant family residing on the waiting list.

8-I.E. SECURITY DEPOSITS [24 CFR 966.4(b)(5)]
At the option of the GBHA, the lease may require security deposits. The amount of the security deposit cannot exceed one month's rent or a reasonable fixed amount as determined by the GBHA. The GBHA may allow for gradual accumulation of the security deposit by the family, or the family may be required to pay the security deposit in full prior to occupancy. Subject to applicable laws, interest earned on security deposits may be refunded to the tenant after vacating the unit, or used for tenant services or activities.

GBHA Policy
Residents must pay a security deposit to the GBHA before or at the time of admission (before signing the lease). The amount of the security deposit will be based on the size of the unit, and follows the schedule below:

Mason Manor Units
1-bedroom = $200
2-bedroom = $200~~50~~

Scattered Site Units
2-bedroom = $400
3-bedroom = $550
4-bedroom = $700

The security deposit must be paid in full prior to occupancy.~~,~~ GBHA will request for the applicant to pay the security deposit in full at the time of when the applicant accepts the offer. An offer letter will be provided to eligible applicants and the letter will state that if the applicant accepts the offer, then he/she will have 10 business days from the date of the offer letter to pay the security deposit in full. f~~unless otherwise permitted by the GBHA. The GBHA has the discretion to allow tenants to make payments based on an established payment arrangement. If a tenant enters into a payment arrangement, the GBHA requires that at least one half of the security deposit be paid prior to admission, and payments must be made such that the full security deposit amount will be paid in three months time from that of move in.~~

The GBHA will hold the security deposit for the period the family occupies the unit. The GBHA will not use the security deposit for rent or other charges while the resident is living in the unit.

Within 21 days of move-out, the GBHA will refund to the resident the amount of the security deposit, less any amount needed to pay the cost of unpaid rent, damages listed on the move-out inspection report that exceed normal wear and tear, and other charges due under the lease.

The GBHA will provide the resident with a written list of any charges against the security deposit within 21 days of the move-out inspection. If the resident disagrees with the amount charged, the GBHA will provide a meeting to discuss the charges.

If the resident transfers to another unit, the GBHA will provide the tenant with a written list of any charges against the "old" security deposit and refund the amount of the deposit, less any amount charged, within 21 days. The resident will be required to pay a security deposit for the "new" unit, which will be based on the size of the unit.

8-I.F. PAYMENTS UNDER THE LEASE

Rent Payments [24 CFR 966.4(b)(1)]
Families must pay the amount of the monthly tenant rent determined by the GBHA in accordance with HUD regulations and other requirements. The amount of the tenant rent is subject to change in accordance with HUD requirements.

The lease must specify the initial amount of the tenant rent at the beginning of the initial lease term, and the GBHA must give written notice stating any change in the amount of tenant rent and when the change is effective.

GBHA Policy
Monthly rent is due the first of the month and must be made payable to the Green Bay Housing Authority. GBHA will grant a grace period for residents to pay rent on time IF rent is submitted between the first and the sixth of the month. Rent payments made on the sixth of the month are still not considered late. ~~If the first falls on a weekend or holiday, the rent is due and payable on the first business day thereafter.~~

If a family's tenant rent changes, the GBHA will notify the family of the new amount and the effective date by sending a "Notice of Rent Adjustment" which will become an attachment to the lease.

Late Fees and Nonpayment
At the option of the GBHA, the lease may provide for payment of penalties when the family is late in paying tenant rent [24 CFR 966.4(b)(3)].

The lease must provide that late payment fees are not due and collectible until two weeks after the GBHA gives written notice of the charges. The written notice is considered an adverse action, and must meet the requirements governing a notice of adverse action [24 CFR 966.4(b)(4)].

The notice of proposed adverse action must identify the specific grounds for the action and inform the family of their right for a hearing under the GBHA grievance procedures. The GBHA must not take the proposed action until the time for the tenant to request a grievance hearing has expired, or (if a hearing was requested within the required timeframe,) the grievance process has been completed [24 CFR 966.4(e)(8)].

GBHA Policy

If the family fails to pay their rent by the sixth day of the month, and the GBHA has not agreed to accept payment at a later date, a onetime $10.00 late fee will be assessed in addition to the regular monthly rent rate. Notice of late fees will be in accordance with requirements regarding notices of adverse action. Charges are due and payable 14-calendar days after billing. If the family requests a grievance hearing within the required timeframe, the GBHA may not take action for nonpayment of the fee until the conclusion of the grievance process. If the resident can document financial hardship, the late fee maybe waived on a case by case basis.

If the sixth of the month falls on a weekend or holiday, the rent must be submitted early (before the weekend or holiday) or the rent must be turned into the GBHA's rent payment drop box. If the sixth of the month falls on a weekend or holiday and rent is submitted into the GBHA's rent payment drop box, then rent will not be considered late per staff receiving the rent on the first business day after the weekend or holiday.

When a check is returned for insufficient funds or is written on a closed account, the rent will be considered unpaid and a returned check fee of $25.00 will be charged to the family. The fee will be due and payable 14 days after billing.

Excess Utility Charges

If the GBHA charges the tenant for consumption of excess utilities, the lease must state the basis for the determination of such charges. The imposition of charges for consumption of excess utilities is permissible only if the charges are determined by an individual check meter servicing the leased unit or result from the use of major tenant-supplied appliances [24 CFR 966.4(b)(2)].

Schedules of special charges for utilities that are required to be incorporated in the lease by reference must be publicly posted in a conspicuous manner in the development office and must be furnished to applicants and tenants on request [24 CFR 966.5].

The lease must provide that charges for excess utility consumption are not due and collectible until two weeks after the GBHA gives written notice of the charges. The written notice is considered an adverse action, and must meet the requirements governing a notice of adverse action [24 CFR 966.4(b)(4)].

The notice of proposed adverse action must identify the specific grounds for the action and inform the family of their right to a hearing under the GBHA grievance procedures. The GBHA must not take the proposed action until the time for the tenant to request a grievance hearing has expired, or (if a hearing was requested within the required timeframe,) the grievance process has been completed [24 CFR 966.4(e)(8)].

GBHA Policy

When applicable, families will be charged for excess utility usage according the GBHA's current posted schedule. Notices of excess utility charges will be mailed monthly and will be in accordance with requirements regarding notice of adverse actions. Charges are due and payable at the time of payment of rent. If the family requests a grievance hearing within the required timeframe, the GBHA may not take action for nonpayment of the charges until the conclusion of the grievance process.

Nonpayment of excess utility charges is a violation of the lease and is grounds for eviction.

Maintenance and Damage Charges

If the GBHA charges the tenant for maintenance and repair beyond normal wear and tear, the lease must state the basis for the determination of such charges [24 CFR 966.4(b)(2)].

Schedules of special charges for services and repairs which are required to be incorporated in the lease by reference must be publicly posted in a conspicuous manner in the development's office and must be furnished to applicants and tenants upon request [24 CFR 966.5].

The lease must provide that charges for maintenance and repair beyond normal wear and tear are not due and collectible until two weeks after the GBHA gives written notice of the charges. The written notice is considered an adverse action, and must meet the requirements governing a notice of adverse action [24 CFR 966.4(b)(4)].

The notice of proposed adverse action must identify the specific grounds for the action and inform the family of their right for a hearing under the GBHA grievance procedures. The GBHA must not take the proposed action until the time for the tenant to request a grievance hearing has expired, or (if a hearing was requested within the required timeframe), the grievance process has been completed [24 CFR 966.4(e)(8)].

GBHA Policy

When applicable, families will be charged for maintenance and/or damages according to the GBHA's current schedule. Work that is not covered in the schedule will be charged based on the actual cost of labor and materials to make needed repairs (including overtime, if applicable). Any plumbing issues that have been caused by the resident(s) of the unit will lead to GBHA charging a fee of $30.00/hour at the nonstandard provisions rate.

Notices of maintenance and damage charges will be mailed as necessary and applicable, and will be in accordance with requirements regarding notices of adverse actions. Charges are due and payable 30 calendar days after billing. The GBHA maintains the discretion to enter into payment arrangements with families for maintenance and damage charges. If the family requests a grievance hearing within the required timeframe, the GBHA may not take action for nonpayment of the charges until the conclusion of the grievance process.

Nonpayment of maintenance and damage charges is a violation of the lease and is grounds for eviction.

8-I.G. MINIMUM HEATING STANDARDS [Notice PIH 2018-19]

PHAs in states, territories, or localities with existing minimum heating standards must use their respective local standards for public housing dwelling units. For PHAs where state or local minimum heating standards do not exist, PHAs must use the HUD-prescribed heating standards specified in Notice PIH 2018-19.

GBHA Policy

The GBHA is located in an area where state or local residential heating standards exist and will utilize those standards for public housing units. Therefore, the GBHA's minimum heating standards are as follows:

Minimum temperature:

If the GBHA controls the temperature, the minimum temperature in each unit must be at least sixty-seven degrees Fahrenheit (67° F). If the resident controls the temperature, the heating equipment must have the capability of heating to at least sixty-seven degrees Fahrenheit (67° F)~~[insert degrees Fahrenheit]~~.

Minimum temperature capability:

~~[If PHAs are allowed flexibility maintaining the indoor temperature when the outdoor temperature approaches the design day temperature, insert criteria for when flexibility applies and the minimum temperature threshold that the indoor temperature should never fall below. Note, the design day temperature refers to the lowest expected outdoor temperature a heating system was designed to accommodate.]~~If the expected outdoor temperature is sixty degrees Fahrenheit (60° F)or lower the heating equipment must have the capability of heating to at least sixty-seven degrees Fahrenheit (67° F).

Measurement:

Temperature measurements must be taken according to the following methodology:verifying thermostat and independent thermometer. ~~[insert methodology for taking temperature measurements].~~

PART II: INSPECTIONS

8-II.A. OVERVIEW

HUD regulations require the GBHA to inspect each dwelling unit prior to move-in, at move-out, and annually during occupancy. In addition, the GBHA may require additional inspections, in accordance with GBHA policy. This part contains the GBHA's policies governing inspections, notification of unit entry, and inspection results.

8-II.B. TYPES OF INSPECTIONS

Move-In Inspections [24 CFR 966.4(i)]

The lease must require the GBHA and the family to inspect the dwelling unit prior to occupancy in order to determine the condition of the unit and equipment in the unit. A copy of the initial inspection, signed by the GBHA and the tenant, must be provided to the tenant and retained in the resident file.

> GBHA Policy
> Any adult family member may attend the initial inspection and sign the inspection form for the head of household.

Move-Out Inspection [24 CFR 966.4(i)]

The GBHA must inspect the unit at the time the resident vacates the unit and must allow the resident to participate in the inspection if he or she wishes, unless the tenant vacates without notice to the GBHA. The GBHA must provide to the tenant a statement of any charges to be made for maintenance and damage beyond normal wear and tear.

The difference between the condition of the unit at move-in and move-out establishes the basis for any charges against the security deposit so long as the work needed exceeds that for normal wear and tear.

> GBHA Policy
> When applicable, the GBHA will provide the tenant with a statement of charges to be made for maintenance and damage beyond normal wear and tear, within 21 days of conducting the move-out inspection.

Annual Inspections [24 CFR 5.705]

~~The GBHA is required to inspect all occupied units annually using HUD's Uniform Physical Condition Standards (UPCS) Under the Public Housing Assessment System (PHAS), HUD's physical condition inspections do not relieve the GBHA of this responsibility to inspect its units [24 CFR 902.20(d)].~~ Section 6(f)(3) of the United States Housing Act of 1937 requires that PHAs inspect each public housing project annually to ensure that the project's units are maintained in decent, safe, and sanitary condition. The GBHA shall continue using the Uniform Physical Condition Standards (UPCS) in 24 CFR 5, Subpart G, Physical Condition Standards and Inspection Requirements, to conduct annual project inspections. These standards address the inspection of the site area, building systems and components, and dwelling units.

> PHA Policy
> The GBHA will inspect all occupied units annually using HUD's Uniform Physical Condition Standards (UPCS).

Quality Control Inspections

The purpose of quality control inspections is to assure that all defects were identified in the original inspection, and that repairs were completed at an acceptable level of craftsmanship and within an acceptable time frame.

GBHA Policy
Supervisory quality control inspections will be conducted in accordance with the GBHA's maintenance plan.

Special Inspections

GBHA Policy
GBHA staff may conduct a special inspection for any of the following reasons:

Housekeeping including pet housekeeping/damages

Unit condition

Suspected lease violation

Preventative maintenance

Routine maintenance

There is a reasonable cause to believe an emergency exists

Other Inspections

GBHA Policy
Building exteriors, grounds, common areas and systems will be inspected according to the GBHA's maintenance plan.

8-II.C. NOTICE AND SCHEDULING OF INSPECTIONS

Notice of Entry

Non-Emergency Entries [24 CFR 966.4(j)(1)]
The GBHA may enter the unit, with reasonable advance notification to perform routine inspections and maintenance, make improvements and repairs, or to show the unit for re-leasing. A written statement specifying the purpose of the GBHA entry delivered to the dwelling unit at least ~~two days~~one day before such entry is considered reasonable notification.

GBHA Policy
The GBHA will notify the resident in writing at least ~~48~~ 24 hours prior to any non-emergency inspection.

For regular annual inspections, the family will receive at least 2 weeks written notice of the inspection to allow the family to prepare the unit for the inspection.

Entry for repairs requested by the family requires a minimum of a 12-hour notice.

Emergency Entries [24 CFR 966.4(j)(2)]
The GBHA may enter the dwelling unit at any time without advance notice when there is reasonable cause to believe that an emergency exists. If no adult household member is present at the time of an emergency entry, the GBHA must leave a written statement showing the date, time and purpose of the entry prior to leaving the dwelling unit.

Scheduling of Inspections

GBHA Policy
Inspections will be conducted during business hours between 7:00AM and 4:00PM. The GBHA is required to provide at least a 24-hour notice of entry. As long as proper notice is provided, the GBHA may enter the unit. If, for a reason acknowledged and accepted by the GBHA, a family needs to reschedule an inspection, they must notify the GBHA at least 24 hours prior to the scheduled inspection. The GBHA will reschedule the inspection no more than once unless the resident has a verifiable good cause to delay the inspection. The GBHA may request verification of such cause.

Attendance at Inspections
Residents are required to be present for move-in inspections [24 CFR 966.4(i)]. There is no such requirement for other types of inspections.

GBHA Policy
Except at move-in inspections, the resident is not required to be present for inspections. The resident may attend inspections if he or she wishes.

If~~n~~ no one is at home, the inspector will enter the unit and~~,~~ conduct the inspection ~~and leave notice of entry in the unit.~~ A follow up letter will be mailed to the resident about the results of the inspection within the next 2 business days.

8-II.D. INSPECTION RESULTS
The GBHA is obligated to maintain dwelling units and the project in a decent, safe and sanitary condition and to make necessary repairs to dwelling units [24 CFR 966.4(e)].

Emergency Repairs [24 CFR 966.4(h)]
If the unit is damaged to the extent that conditions are created which are hazardous to the life, health, or safety of the occupants, the tenant must immediately notify the GBHA of the damage, and the GBHA must make repairs within a reasonable time frame.

If the damage was caused by a household member or guest, the GBHA must charge the family for the reasonable cost of repairs. The GBHA may also take lease enforcement action against the family.

If the GBHA cannot make repairs quickly, the GBHA must offer the family standard alternative accommodations. If the GBHA can neither repair the defect within a reasonable time frame nor offer alternative housing, rent shall be abated in proportion to the seriousness of the damage and loss in value as a dwelling. Rent shall not be abated if the damage was caused by a household member or guest, or if the resident rejects the alternative accommodations.

GBHA Policy
When conditions in the unit are hazardous to life, health, or safety, the GBHA will make repairs or otherwise abate the situation within 24 hours.

Defects hazardous to life, health or safety include, but are not limited to, the following:

Any condition that jeopardizes the security of the unit

Major plumbing leaks or flooding, waterlogged ceiling or floors in imminent danger of falling

Natural or LP gas or fuel oil leaks

Any electrical problem or condition that could result in shock or fire

Absence of a working heating system when outside temperature is below 60 degrees Fahrenheit

Utilities not in service, including no running hot water

Conditions that present the imminent possibility of injury

Obstacles that prevent safe entrance or exit from the unit

Absence of a functioning toilet in the unit

Inoperable smoke detectors/carbon monoxide detectors

In any emergency maintenance situation, GBHA will enter the unit without notice or permission to enter.

Non-Emergency repairs

GBHA Policy
The GBHA will correct non-life threatening health and safety defects within 15 business days of the inspection date. If the GBHA is unable to make repairs within that period due to circumstances beyond the GBHA's control (e.g. required parts or services are not available, weather conditions, etc.) the GBHA will notify the family of an estimated date of completion.

The family must allow the GBHA access to the unit to make repairs.

Resident-Caused Damages

GBHA Policy
Damages to the unit beyond normal wear and tear will be billed to the tenant in accordance with the policies in 8-I.F~~G~~., Maintenance and Damage Charges.

Repeated or excessive damages to the unit beyond normal wear and tear will be considered a serious or repeated violation of the lease.

Housekeeping

GBHA Policy
Residents whose housekeeping habits pose a non-emergency health or safety risk, encourage insect or rodent infestation, or cause damage to the unit are in violation of the lease. In these instances, the GBHA will provide proper notice of a lease violation.

A re-inspection will be conducted within 30 days to confirm that the resident has complied with the requirement to abate the problem. Failure to abate the problem or allow for a re-inspection is considered a violation of the lease and may result in termination of tenancy in accordance with Chapter 13.

Notices of lease violations will also be issued to residents who purposely disengage the unit's smoke detector or carbon monoxide detector. GBHA will charge a fee of $500.00 to any family who disengages the unit's smoke detector. ~~Only one warning will be given. A second incidence could result in lease termination.~~

11:17 AM

10/09/19

Green Bay Housing Authority
Check Detail
August through September 2019

Type	Num	Date	Name	Memo	Account	Paid Amount
Check		**08/31/2019**		**Service Cha...**	**1111.01 · General ...**	
				Service Charge	4530.00 · Bank Fees	-108.20
TOTAL						-108.20
Check		**09/30/2019**		**Service Cha...**	**1111.01 · General ...**	
				Service Charge	4530.00 · Bank Fees	-103.30
TOTAL						-103.30
Bill Pmt -Check	**5234**	**08/01/2019**	**CITY OF GREEN B...**		**1111.01 · General ...**	
Bill	PILOT-2019 MM	06/30/2019		PILOT 2019	4520.00 · PILOT	-33,135.05
Bill	PILOT -2019 SS	06/30/2019		PILOT 2019	4520.00 · PILOT	-34,934.87
TOTAL						-68,069.92
Bill Pmt -Check	**5235**	**08/01/2019**	**AT&T**	**door system**	**1111.01 · General ...**	
Bill	6/23-7/22/19	07/22/2019		doo system	4190.07 · Tele Fax...	-46.23
				door system	4190.07 · Tele Fax...	-46.23
TOTAL						-92.46
Bill Pmt -Check	**5236**	**08/01/2019**	**CELLCOM**	**cell bill**	**1111.01 · General ...**	
Bill	969369	07/15/2019		cell bill	4190.07 · Tele Fax...	-43.01
				cell bill	4190.07 · Tele Fax...	-92.98
TOTAL						-135.99
Bill Pmt -Check	**5237**	**08/01/2019**	**CITY OF GREEN B...**		**1111.01 · General ...**	
Bill	970-12420	07/05/2019		keys/locks	4420.00 · Maint - S...	-127.52
Bill	970-12420	07/08/2019		lights/pail/shi...	4420.00 · Maint - S...	-85.48
Bill	970-12420	07/09/2019		doors - 323 A...	4430.25 · Unit Repair	-242.13
				keys/locks/cap	4420.00 · Maint - S...	-109.67
				doors - 1428 ...	4430.25 · Unit Repair	-1,428.00
				doors- 323 A...	4430.25 · Unit Repair	-1,078.87
Bill	970-12420	07/09/2019		background c...	4130.01 · Investigat...	-4.97
				background c...	4130.01 · Investigat...	-4.98
				meal sight ex...	4220.01 · Ten Ser -...	-77.00
				stamps	4190.02 · Postage	-220.00
				stamps	4190.02 · Postage	-220.00
Bill	122127	07/24/2019		payroll liabiliti...	4182.00 · Employe...	-362.26
				payroll liabiliti...	4182.00 · Employe...	-543.38
				payroll liabiliti...	4182.00 · Employe...	-543.38
				payroll liabiliti...	4433.00 · Emp Ben...	-724.51
				payroll liabiliti...	4433.00 · Emp Ben...	-362.26
TOTAL						-6,134.41
Bill Pmt -Check	**5238**	**08/01/2019**	**D & D Glass Co. L...**	**323 N Ashland**	**1111.01 · General ...**	
Bill	74716	07/11/2019		screans	4420.00 · Maint - S...	-196.92
TOTAL						-196.92

Green Bay Housing Authority
Check Detail
August through September 2019

Type	Num	Date	Name	Memo	Account	Paid Amount
Bill Pmt -Check	**5239**	**08/01/2019**	**Ellison Electric Su...**	**SS**	**1111.01 · General ...**	
Bill	1101902	06/29/2019		Wallplates	4420.00 · Maint - S...	-94.80
TOTAL						-94.80
Bill Pmt -Check	**5240**	**08/01/2019**	**GREEN BAY WAT...**		**1111.01 · General ...**	
Bill	7/15/19-1882-06	07/15/2019		886 Division	4390.00 · Other Util...	-57.41
				886 Division	4310.00 · Water	-102.37
Bill	7/15/19-5210-05	07/15/2019		836 Cora	4390.00 · Other Util...	-57.41
				836 Cora	4310.00 · Water	-103.41
Bill	7/15/19-4356-06	07/15/2019		896 School	4390.00 · Other Util...	-57.41
				896 School	4310.00 · Water	-69.77
Bill	7/15/19-2170-03	07/15/2019		815 Dousman	4390.00 · Other Util...	-57.41
				815 Dousman	4310.00 · Water	-132.81
Bill	7/15/19-2375-04	07/15/2019		1428 Dousmen	4390.00 · Other Util...	-57.41
				1428 Dousmen	4310.00 · Water	-117.61
Bill	7/15/19-4089-05	07/15/2019		835 Christiana	4390.00 · Other Util...	-57.41
				835 Christiana	4310.00 · Water	-298.01
Bill	7/15/19-4086-04	07/15/2019		839 Christiana	4390.00 · Other Util...	-57.41
				839 Christiana	4310.00 · Water	-108.37
Bill	7/15/19-5399-04	07/15/2019		323 N Ashland	4390.00 · Other Util...	-112.80
				323 N Ashland	4310.00 · Water	-218.79
Bill	7/15/19-5334-04	07/15/2019		516 N Ashland	4390.00 · Other Util...	-57.41
				516 N Ashland	4310.00 · Water	-365.57
Bill	7/15/19-5706-05	07/15/2019		913 n Chestnut	4390.00 · Other Util...	-57.41
				913 n Chestnut	4310.00 · Water	-117.05
Bill	7/15/19-5694-03	07/15/2019		715 N Chest...	4390.00 · Other Util...	-57.41
				715 N Chest...	4310.00 · Water	-243.11
Bill	7/15/19-33210-01	07/15/2019		510 N Chest...	4390.00 · Other Util...	-57.41
				510 N Chest...	4310.00 · Water	-48.33
Bill	7/15/19-5574-03	07/15/2019		409 N Maple	4390.00 · Other Util...	-57.41
				409 N Maple	4310.00 · Water	-40.15
Bill	7/15/19-5524-04	07/15/2019		522 N Maple	4390.00 · Other Util...	-57.41
				522 N Maple	4310.00 · Water	-220.19
Bill	7/15/19-5573-04	07/15/2019		415 N Maple	4390.00 · Other Util...	-57.41
				415 N Maple	4310.00 · Water	-74.23
Bill	7/15/19	07/15/2019		816 N Maple	4390.00 · Other Util...	-57.41
				816 N Maple	4310.00 · Water	-54.21
Bill	7/15/19-5459-02	07/15/2019		509 S Maple	4390.00 · Other Util...	-57.41
				509 S Maple	4310.00 · Water	-155.40
TOTAL						-3,500.74
Bill Pmt -Check	**5241**	**08/01/2019**	**Hurckman Mechan...**	**1424 Admira...**	**1111.01 · General ...**	
Bill	W29429	07/01/2019		roof	4430.25 · Unit Repair	-8,460.00
TOTAL						-8,460.00
Bill Pmt -Check	**5242**	**08/01/2019**	**Ka Vang**	**mileage**	**1111.01 · General ...**	
Bill	10/1/18-6/30/19	06/30/2019		mileage	4150.00 · Travel	-6.82
				mileage	4150.00 · Travel	-11.32
TOTAL						-18.14
Bill Pmt -Check	**5243**	**08/01/2019**	**Lindeman's Cleani...**		**1111.01 · General ...**	
Bill	89324	07/15/2019		cleaning drap...	4430.01 · Maint - N...	-54.66
Bill	89325	07/15/2019		cleaining der...	4430.01 · Maint - N...	-54.66
TOTAL						-109.32

Green Bay Housing Authority
Check Detail
August through September 2019

Type	Num	Date	Name	Memo	Account	Paid Amount
Bill Pmt -Check	**5244**	**08/01/2019**	**LITURGICAL PUB...**	**1424 Admira...**	**1111.01 · General ...**	
Bill	231565	07/11/2019		ads	4190.08 · Marketing	-906.00
TOTAL						-906.00
Bill Pmt -Check	**5245**	**08/01/2019**	**LIZER LAWN CARE**		**1111.01 · General ...**	
Bill	93172AD	07/16/2019		mowing	4430.13 · Landscap...	-24.90
Bill	93173AD	07/16/2019		mowing	4430.13 · Landscap...	-99.60
Bill	93234AD	07/17/2019		mowing	4430.13 · Landscap...	-49.80
Bill	39210AD	07/17/2019		mowing	4430.13 · Landscap...	-74.70
Bill	93211AD	07/17/2019		mowing	4430.13 · Landscap...	-74.70
TOTAL						-323.70
Bill Pmt -Check	**5246**	**08/01/2019**		**SD refund**	**1111.01 · General ...**	
Bill	SD refund	07/26/2019		SD refund - ...	2114.00 · Tenant S...	-200.00
				Key Dept ref...	2114.02 · Security ...	-10.00
TOTAL						-210.00
Bill Pmt -Check	**5247**	**08/01/2019**	**Patrick A. Zelzer &...**	**409 N Maple**	**1111.01 · General ...**	
Bill	ZEL-2019001856	07/24/2019		paper service	4130.00 · Legal Ex...	-50.00
TOTAL						-50.00
Bill Pmt -Check	**5248**	**08/01/2019**	**Riverside Welding...**	**1424 Admiral**	**1111.01 · General ...**	
Bill	40417	07/09/2019		repair ramp r...	4420.00 · Maint - S...	-526.18
TOTAL						-526.18
Bill Pmt -Check	**5249**	**08/01/2019**	**WISCONSIN PUBL...**		**1111.01 · General ...**	
Bill	7/16/19-2671-00190	07/16/2019		1410 Univeristy	4320.00 · Electricity	-50.53
				1410 Univeristy	4330.00 · Gas	-19.50
Bill	7/16/19-2671-00193	07/16/2019		1412 University	4320.00 · Electricity	-10.99
				1412 University	4330.00 · Gas	-7.38
Bill	8/2019 UR's	08/01/2019		1009 Crooks ...	4320.01 · Utility Rei...	-105.00
				510 N Chest...	4320.01 · Utility Rei...	-89.00
				1343 Univers...	4320.01 · Utility Rei...	-67.00
				1014 Pine - ...	4320.01 · Utility Rei...	-55.00
				1404 Univers...	4320.01 · Utility Rei...	-110.00
				1420 Univesr...	4320.01 · Utility Rei...	-86.00
				1440 Univers...	4320.01 · Utility Rei...	-86.00
				886 Division -...	4320.01 · Utility Rei...	-178.00
				415 N Maple ...	4320.01 · Utility Rei...	-114.00
				837 Christian...	4320.01 · Utility Rei...	-30.00
				967 Holzer - ...	4320.01 · Utility Rei...	-134.00
				509 N Maple ...	4320.01 · Utility Rei...	-88.00
TOTAL						-1,230.40
Bill Pmt -Check	**5250**	**08/15/2019**	**AMA HEATING**	**1424 Admira...**	**1111.01 · General ...**	
Bill	S86868	07/30/2019		filters	4430.10 · Heating a...	-229.60
TOTAL						-229.60

Green Bay Housing Authority
Check Detail
August through September 2019

Type	Num	Date	Name	Memo	Account	Paid Amount
Bill Pmt -Check	**5251**	**08/15/2019**	**BELSON CO**	**1424 Admira...**	**1111.01 · General ...**	
Bill	336338	07/26/2019		plates/towels...	4420.00 · Maint - S...	-507.38
TOTAL						-507.38
Bill Pmt -Check	**5252**	**08/15/2019**		**SD refund**	**1111.01 · General ...**	
Bill	SD refund	06/03/2019		SD refund - ...	2114.00 · Tenant S...	-200.00
				Key Dept ref...	2114.02 · Security ...	-15.00
TOTAL						-215.00
Bill Pmt -Check	**5253**	**08/15/2019**	**Bug Blaster Inc**		**1111.01 · General ...**	
Bill	23718	07/24/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	23719	07/24/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	23720	07/24/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	23721	07/24/2019		pest treatment	4430.17 · Extermin...	-35.00
Bill	23715	07/24/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	23716	07/24/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	23717	07/24/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	23807	07/29/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	23852	07/31/2019		wasps	4430.17 · Extermin...	-100.00
TOTAL						-1,115.00
Bill Pmt -Check	**5254**	**08/15/2019**	**CITY OF GREEN B...**		**1111.01 · General ...**	
Bill	970-12420	07/15/2019		waste manag...	4430.19 · Garbage ...	-410.00
Bill	970-12420	07/17/2019		water can/swi...	4420.00 · Maint - S...	-59.54
Bill	121768	07/17/2019		mailings	4190.02 · Postage	-13.79
				calendars & ...	4190.01 · Printing	-74.25
Bill	970-12420	07/18/2019		weed killer & ...	4430.13 · Landscap...	-37.98
				drop cloth/fer...	4420.00 · Maint - S...	-76.40
				stoves	4430.25 · Unit Repair	-1,739.97
Bill	121823	07/18/2019		gas	4430.03 · Maint - Tr...	-0.44
				office supplies	4190.03 · Paper & ...	-114.04
Bill	970-12420	07/22/2019		Hibu	4190.08 · Marketing	-20.00
				court filing fees	4130.00 · Legal Ex...	-117.65
Bill	970-12420	07/23/2019		chain/sparkpl...	4430.13 · Landscap...	-60.02
				knob/switchpl...	4420.00 · Maint - S...	-68.95
				SCREWDRI...	4420.00 · Maint - S...	-21.94
Bill	970-12420	07/25/2019		cleaning sup...	4420.00 · Maint - S...	-226.95
				diffuser & the...	4420.00 · Maint - S...	-98.86
Bill	122200	07/25/2019		workers comp	4433.00 · Emp Ben...	-7.97
				workers comp	4433.00 · Emp Ben...	-7.97
Bill	970-12422	07/31/2019		Wages	4110.00 · Admin Sa...	-7,594.47
				Benifits	4182.00 · Employe...	-3,414.48
				Wages	4410.00 · Maint - L...	-8,021.52
				Benifits	4433.00 · Emp Ben...	-3,123.53
				Wages	4110.00 · Admin Sa...	-4,125.69
				Benifits	4182.00 · Employe...	-1,613.78
				Wages	4410.00 · Maint - L...	-4,720.51
				Benifits	4433.00 · Emp Ben...	-1,806.41
				Wages	4110.00 · Admin Sa...	-5,077.45
				Benifits	4182.00 · Employe...	-2,304.14
Bill	970-12420	07/31/2019		copies	4190.01 · Printing	-81.61
				copies	4190.01 · Printing	-81.60
Bill	122764	08/07/2019		fuel	4430.03 · Maint - Tr...	-66.08
				fuel	4430.03 · Maint - Tr...	-66.08
Bill	970-12420	08/08/2019		WAHA conff ...	4140.00 · Staff Trai...	-375.00
TOTAL						-45,629.07

Green Bay Housing Authority
Check Detail
August through September 2019

Type	Num	Date	Name	Memo	Account	Paid Amount
Bill Pmt -Check	**5255**	**08/15/2019**	[redacted]	**SD refund**	**1111.01 · General ...**	
Bill	SD refund	08/13/2019		SD refund - ...	2114.00 · Tenant S...	-200.00
TOTAL						-200.00
Bill Pmt -Check	**5256**	**08/15/2019**	**ELAND ELECTRIC**	**1424 Admiral**	**1111.01 · General ...**	
Bill	95672	07/16/2019		lighting	4430.25 · Unit Repair	-2,600.00
TOTAL						-2,600.00
Bill Pmt -Check	**5257**	**08/15/2019**	**Ellison Electric Su...**		**1111.01 · General ...**	
Bill	1103542	07/23/2019		light bulbs	4420.00 · Maint - S...	-392.49
Bill	1104046	07/31/2019		bulbs	4420.00 · Maint - S...	-208.50
				lights	4430.25 · Unit Repair	-157.15
				lights	4430.25 · Unit Repair	-76.26
Bill	1104048	07/31/2019		swichs & wall...	4420.00 · Maint - S...	-68.93
Bill	1104247	08/02/2019		lights	4430.25 · Unit Repair	-228.78
				lights	4430.25 · Unit Repair	-157.15
TOTAL						-1,289.26
Bill Pmt -Check	**5258**	**08/15/2019**	[redacted]	**SD refund**	**1111.01 · General ...**	
Bill	SF refund	08/12/2019		SD refund - ...	2114.00 · Tenant S...	-200.00
				Key Dept ref...	2114.02 · Security ...	-15.00
TOTAL						-215.00
Bill Pmt -Check	**5259**	**08/15/2019**	**FIRST SUPPLY G...**	**ss**	**1111.01 · General ...**	
Bill	11768746-00	07/16/2019		toilets	4420.00 · Maint - S...	-408.10
TOTAL						-408.10
Bill Pmt -Check	**5260**	**08/15/2019**	**GRAINGER**		**1111.01 · General ...**	
Bill	9239655054	07/22/2019		sump pump	4420.00 · Maint - S...	-356.87
Bill	9250832632	08/01/2019		drain opener	4420.00 · Maint - S...	-108.50
Bill	9250832640	08/01/2019		motor	4420.00 · Maint - S...	-37.06
Bill	9250832657	08/01/2019		motors (12)	4420.00 · Maint - S...	-444.72
Bill	9250832665	08/01/2019		motor & blow...	4420.00 · Maint - S...	-530.96
TOTAL						-1,478.11
Bill Pmt -Check	**5261**	**08/15/2019**	**GREEN BAY WAT...**	**1424 Admiral**	**1111.01 · General ...**	
Bill	7/31/19-4665-01	07/31/2019		1424 Admiral	4390.00 · Other Util...	-338.00
				1424 Admiral	4310.00 · Water	-3,618.78
TOTAL						-3,956.78

Green Bay Housing Authority
Check Detail
August through September 2019

Type	Num	Date	Name	Memo	Account	Paid Amount
Bill Pmt -Check	**5262**	**08/15/2019**	**H.J. MARTIN & SO...**		**1111.01 · General ...**	
Bill	HJ257364	07/23/2019		flooring	4430.25 · Unit Repair	-1,660.47
				flooring	4430.25 · Unit Repair	-1,681.35
Bill	HJ261030	07/23/2019		flooring # 511	4430.00 · Maint - C...	-438.43
Bill	HJ261048	07/29/2019		flooring	4430.25 · Unit Repair	-2,039.45
				flooring	4430.25 · Unit Repair	-1,339.53
Bill	HJ259055	07/29/2019		flooring #318	4430.00 · Maint - C...	-513.40
Bill	HJ258881	07/29/2019		flooring # 612	4430.00 · Maint - C...	-413.77
Bill	HJ259927	07/29/2019		flooring #301	4430.00 · Maint - C...	-529.09
Bill	HJ260889	07/29/2019		flooring #413	4430.00 · Maint - C...	-438.43
TOTAL						-9,053.92
Bill Pmt -Check	**5263**	**08/15/2019**	**KONE INC**	**1424 Admira...**	**1111.01 · General ...**	
Bill	959321249	08/01/2019		maint coverage	4430.12 · Elevator ...	-450.00
TOTAL						-450.00
Bill Pmt -Check	**5264**	**08/15/2019**	**LANGAN INVESTI...**		**1111.01 · General ...**	
Bill	7/1-7/31/19 ss	08/03/2019		screenings/in...	4130.01 · Investigat...	-658.00
Bill	7/1-7/31/19 MM	08/03/2019		screenings	4130.01 · Investigat...	-168.00
TOTAL						-826.00
Bill Pmt -Check	**5265**	**08/15/2019**	**LARSON PAINTING**		**1111.01 · General ...**	
Bill	5182	08/01/2019		painting #307	4430.00 · Maint - C...	-231.80
Bill	5183	08/01/2019		painting	4430.25 · Unit Repair	-1,032.53
Bill	5184	08/01/2019		painting	4430.25 · Unit Repair	-914.82
TOTAL						-2,179.15
Bill Pmt -Check	**5266**	**08/15/2019**	**Lutheran Social S...**		**1111.01 · General ...**	
Bill	144669	04/30/2019		Social worker	4210.00 · Ten Ser-...	-3,429.83
Bill	145212	05/31/2019		Social worker	4210.00 · Ten Ser-...	-3,429.83
Bill	145751	06/30/2019		Social worker	4210.00 · Ten Ser-...	-3,429.83
Bill	146569	07/31/2019		Social worker	4210.00 · Ten Ser-...	-3,429.83
TOTAL						-13,719.32
Bill Pmt -Check	**5267**	**08/15/2019**	**MID-STATE SUPPLY**		**1111.01 · General ...**	
Bill	4299413	07/25/2019		cabinets	4430.25 · Unit Repair	-791.11
				cabinets	4430.25 · Unit Repair	-2,630.09
Bill	4299468	07/25/2019		cabinets	4430.25 · Unit Repair	-121.41
Bill	4299466	07/25/2019		cabinet parts	4430.25 · Unit Repair	-93.36
Bill	4299467	07/25/2019		cabinet parts	4430.25 · Unit Repair	-93.36
Bill	4299680	07/26/2019		spray	4420.00 · Maint - S...	-64.64
TOTAL						-3,793.97
Bill Pmt -Check	**5268**	**08/15/2019**	**Sandberg K9 Solu...**	**1424 Admira...**	**1111.01 · General ...**	
Bill	1466	08/05/2019		quarterly insp...	4430.17 · Extermin...	-2,999.98
TOTAL						-2,999.98

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Type	Num	Date	Name	Memo	Account	Paid Amount
Bill Pmt -Check	**5269**	**08/15/2019**	**SCOTT WARNER ...**		**1111.01 · General ...**	
Bill	112	07/20/2019		replace boot ...	4420.00 · Maint - S...	-125.00
Bill	111	07/20/2019		323 Ashland ...	4430.25 · Unit Repair	-275.00
Bill	110	07/20/2019		windows (13)	4430.25 · Unit Repair	-1,300.00
				remove dithc...	4420.00 · Maint - S...	-225.00
Bill	109	07/20/2019		Windows (16)	4430.25 · Unit Repair	-1,600.00
				doors (5)	4430.25 · Unit Repair	-250.00
				remove kitch...	4420.00 · Maint - S...	-230.00
TOTAL						-4,005.00
Bill Pmt -Check	**5270**	**08/15/2019**	**SHERWIN-WILLIA...**	**1424 Admirl ct**	**1111.01 · General ...**	
Bill	2992-8	07/09/2019		paint	4420.00 · Maint - S...	-165.86
TOTAL						-165.86
Bill Pmt -Check	**5271**	**08/15/2019**	**TIME WARNER CA...**	**1424 Admial...**	**1111.01 · General ...**	
Bill	8/1/19-8/31/19	08/02/2019		cable	4230.00 · Ten Ser-...	-2,483.39
TOTAL						-2,483.39
Bill Pmt -Check	**5272**	**08/15/2019**	**WISCONSIN PUBL...**		**1111.01 · General ...**	
Bill	7/29/19-2671-00194	07/29/2019		323 N Ashland	4320.00 · Electricity	-27.75
				323 N Ashland	4330.00 · Gas	-17.08
Bill	7/29/19-2671-00184	07/29/2019		409 N Maple	4320.00 · Electricity	-113.33
				409 N Maple	4330.00 · Gas	-25.68
Bill	8/1/19-2671-00002	08/01/2019		1424 Admiral	4320.00 · Electricity	-6,467.19
				1424 Admiral	4330.00 · Gas	-435.19
Bill	8/1/19-2671-00036	08/01/2019		1424 Admiral	4320.00 · Electricity	-181.89
Bill	8/2/19-2671-00192	08/02/2019		1428 Dousman	4320.00 · Electricity	-24.47
				1428 Dousman	4330.00 · Gas	-18.09
Bill	8/6/19-2671-00194	08/06/2019		323 N Ashland	4320.00 · Electricity	-11.06
				323 N Ashland	4330.00 · Gas	-4.85
TOTAL						-7,326.58
Bill Pmt -Check	**5273**	**08/29/2019**	**ABC Supply Co.**		**1111.01 · General ...**	
Bill	83296093	07/30/2019		1428 Dousm...	4430.25 · Unit Repair	-2,410.60
Bill	84029385	07/31/2019		1428 Dousm...	4430.25 · Unit Repair	-180.31
TOTAL						-2,590.91
Bill Pmt -Check	**5274**	**08/29/2019**	**AMA HEATING**		**1111.01 · General ...**	
Bill	J11701	08/26/2019		1412 Univers...	4430.10 · Heating a...	-2,673.00
Bill	J11702	08/26/2019		1410 Uniersit...	4430.10 · Heating a...	-2,653.00
TOTAL						-5,326.00
Bill Pmt -Check	**5275**	**08/29/2019**	**BELSON CO**		**1111.01 · General ...**	
Bill	337555	08/08/2019		garbage bags	4420.00 · Maint - S...	-92.16
Bill	338122	08/13/2019		garbage bags	4420.00 · Maint - S...	-30.72
TOTAL						-122.88

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Type	Num	Date	Name	Memo	Account	Paid Amount
Bill Pmt -Check	**5276**	**08/29/2019**	**Brown County Plu...**		**1111.01 · General ...**	
Bill	6177	08/14/2019		water heater	4430.25 · Unit Repair	-1,450.00
Bill	6171	08/14/2019		tub/shower/fa...	4420.00 · Maint - S...	-350.00
TOTAL						-1,800.00
Bill Pmt -Check	**5277**	**08/29/2019**	**Brown County Sh...**	**Eviction ser...**	**1111.01 · General ...**	
Bill	19-001580	08/21/2019		eviction seric...	4130.00 · Legal Ex...	-100.75
TOTAL						-100.75
Bill Pmt -Check	**5278**	**08/29/2019**	**Bug Blaster Inc**		**1111.01 · General ...**	
Bill	24066	08/07/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	24074	08/07/2019		pest control	4430.17 · Extermin...	-35.00
Bill	24067	08/07/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	24068	08/07/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	24070	08/07/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	24071	08/07/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	24072	08/07/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	24073	08/07/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	24280	08/12/2019		pest control -...	4430.17 · Extermin...	-125.00
Bill	24781	08/21/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	24780	08/21/2019		pest control	4430.17 · Extermin...	-35.00
Bill	24779	08/21/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	24778	08/21/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	24777	08/21/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	24774	08/21/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	24775	08/21/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	24776	08/21/2019		bed bug treat...	4430.17 · Extermin...	-140.00
Bill	24841	08/22/2019		bed bug treat...	4430.17 · Extermin...	-350.00
TOTAL						-2,505.00
Bill Pmt -Check	**5279**	**08/29/2019**	**CEC**	**1424 Admira...**	**1111.01 · General ...**	
Bill	316848	08/21/2019		key cards	4420.00 · Maint - S...	-254.00
TOTAL						-254.00
Bill Pmt -Check	**5280**	**08/29/2019**	**CELLCOM**	**cell bill**	**1111.01 · General ...**	
Bill	102902	08/15/2019		cell bill	4190.07 · Tele Fax...	-54.88
				cell bill	4190.07 · Tele Fax...	-104.85
TOTAL						-159.73
Bill Pmt -Check	**5281**	**08/29/2019**	**CITY OF GREEN B...**		**1111.01 · General ...**	
Bill	970-12420	07/26/2019		pvc - 323 As...	4420.00 · Maint - S...	-69.16
Bill	970-12420	07/30/2019		SD card	4190.07 · Tele Fax...	-7.97
				SD card	4190.07 · Tele Fax...	-7.98
				PVC	4420.00 · Maint - S...	-20.84
				Therminal kit/...	4420.00 · Maint - S...	-49.78
				range parts	4430.25 · Unit Repair	-60.00
				Electronics D...	4430.19 · Garbage ...	-383.08
				Electronics D...	4430.19 · Garbage ...	-230.60
				mower parts	4430.13 · Landscap...	-63.47
Bill	970-12420	08/01/2019		WHEDA Gra...	4432.00 · Extraordi...	-8,696.26
Bill	970-12420	08/01/2019		cleaner/TP h...	4420.00 · Maint - S...	-108.37
Bill	970-12420	08/06/2019		background c...	4130.01 · Investigat...	-5.97
				background c...	4130.01 · Investigat...	-5.96

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Type	Num	Date	Name	Memo	Account	Paid Amount
				pens/paper/w...	4190.03 · Paper & ...	-42.21
				pens/paper/w...	4190.03 · Paper & ...	-42.22
Bill	970-12420	08/07/2019		blade sharpin...	4420.00 · Maint - S...	-32.96
Bill	970-12420	08/08/2019		shop-vac	4420.00 · Maint - S...	-124.99
				Vinyl/pvc/doo...	4420.00 · Maint - S...	-293.03
Bill	970-12420	08/13/2019		fridg door ga...	4420.00 · Maint - S...	-280.60
				keys/locks/co...	4420.00 · Maint - S...	-170.32
Bill	970-12420	08/13/2019		eviction fees	4130.00 · Legal Ex...	-90.75
				waste manag...	4430.19 · Garbage ...	-410.00
Bill	970-12420	08/16/2019		door knobs/el...	4420.00 · Maint - S...	-129.63
Bill	123435	08/19/2019		mailings	4190.02 · Postage	-60.53
				calendars & ...	4190.01 · Printing	-204.75
Bill	970-12420	08/21/2019		cleaning sup...	4420.00 · Maint - S...	-97.10
				cleaning sup...	4420.00 · Maint - S...	-183.39
Bill	123653	08/22/2019		workers comp	4433.00 · Emp Ben...	-193.41
				workers comp	4433.00 · Emp Ben...	-193.40
Bill	970-12420	08/22/2019		HIBU	4190.08 · Marketing	-20.00
TOTAL						-12,278.73
Bill Pmt -Check	**5282**	**08/29/2019**	**Clean By Design L...**	**1424 Admira...**	**1111.01 · General ...**	
Bill	1530	08/16/2019		cleaning # 417	4430.00 · Maint - C...	-250.00
TOTAL						-250.00
Bill Pmt -Check	**5283**	**08/29/2019**	**D & D Glass Co. L...**	**1424 Admira...**	**1111.01 · General ...**	
Bill	74785	08/01/2019		repair screens	4420.00 · Maint - S...	-362.70
TOTAL						-362.70
Bill Pmt -Check	**5284**	**08/29/2019**	**Ellison Electric Su...**		**1111.01 · General ...**	
Bill	1104729	08/08/2019		1412 Univers...	4430.25 · Unit Repair	-235.73
				1410 Univers...	4430.25 · Unit Repair	-235.72
Bill	1104730	08/08/2019		wall palates	4420.00 · Maint - S...	-17.65
Bill	1105232	08/15/2019		Lights	4430.25 · Unit Repair	-171.16
				lights	4420.00 · Maint - S...	-456.83
Bill	1105231	08/15/2019		lights	4420.00 · Maint - S...	-188.37
TOTAL						-1,305.46
Bill Pmt -Check	**5285**	**08/29/2019**	**GRAINGER**		**1111.01 · General ...**	
Bill	9255936610	08/07/2019		dehumidifier	4430.25 · Unit Repair	-177.13
Bill	9263643935	08/15/2019		blower wheels	4420.00 · Maint - S...	-493.20
Bill	9263643943	08/15/2019		blower wheels	4420.00 · Maint - S...	-41.10
Bill	9263643950	08/15/2019		batteries	4420.00 · Maint - S...	-128.40
Bill	9263643968	08/15/2019		drain cleaner	4420.00 · Maint - S...	-108.50
Bill	9263643976	08/15/2019		smoke alarms	4420.00 · Maint - S...	-523.20
Bill	9269743903	08/21/2019		batteries	4420.00 · Maint - S...	-41.88
TOTAL						-1,513.41

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Type	Num	Date	Name	Memo	Account	Paid Amount
Bill Pmt -Check	**5286**	**08/29/2019**	**GREEN BAY WAT...**		**1111.01 · General ...**	
Bill	8/19/19-13182-04	08/19/2019		1009 Crooks	4390.00 · Other Util...	-57.41
				1009 Crooks	4310.00 · Water	-469.12
Bill	8/19/19-10417-02	08/19/2019		1014 Pine	4390.00 · Other Util...	-57.41
				1014 Pine	4310.00 · Water	-233.81
Bill	8/19/19-10413-04	08/19/2019		1100 pine	4390.00 · Other Util...	-57.41
				1100 pine	4310.00 · Water	-192.79
Bill	8/19/19-10418-03	08/19/2019		1008 pine	4390.00 · Other Util...	-57.41
				1008 pine	4310.00 · Water	-237.69
Bill	8/19/19-11009-03	08/19/2019		1333 University	4390.00 · Other Util...	-57.41
				1333 University	4310.00 · Water	-236.91
Bill	8/19/19-11008-03	08/19/2019		1339 University	4390.00 · Other Util...	-57.41
				1339 University	4310.00 · Water	-227.61
Bill	8/19/19-2906-02	08/19/2019		1337 University	4390.00 · Other Util...	-57.41
				1337 University	4310.00 · Water	-157.12
Bill	8/19/19-11007-04	08/19/2019		1341 University	4390.00 · Other Util...	-57.41
				1341 University	4310.00 · Water	-111.20
Bill	10914-03	08/19/2019		1448 University	4390.00 · Other Util...	-57.41
				1448 University	4310.00 · Water	-137.41
Bill	8/19/19-33069-01	08/19/2019		1424 University	4390.00 · Other Util...	-57.41
				1424 University	4310.00 · Water	-240.77
Bill	8/19/19-33070-01	08/19/2019		1440 University	4390.00 · Other Util...	-57.41
				1440 University	4310.00 · Water	-110.73
Bill	8/19/19-10909-03	08/19/2019		1408 University	4390.00 · Other Util...	-57.41
				1408 University	4310.00 · Water	-236.40
Bill	8/19/19-10911-04	08/19/2019		1416 University	4390.00 · Other Util...	-57.41
				1416 University	4310.00 · Water	-42.49
Bill	8/19/19-33067-01	08/19/2019		1404 University	4390.00 · Other Util...	-57.41
				1404 University	4310.00 · Water	-140.75
Bill	8/19/19-33071-01	08/19/2019		1444 University	4390.00 · Other Util...	-57.41
				1444 University	4310.00 · Water	-55.96
Bill	8/19/19-10910-03	08/19/2019		1412 University	4390.00 · Other Util...	-57.41
				1412 University	4310.00 · Water	-58.97
Bill	8/19/19-10912-03	08/19/2019		1420 University	4390.00 · Other Util...	-57.41
				1420 University	4310.00 · Water	-89.50
Bill	8/19/19-33068-01	08/19/2019		1410 University	4390.00 · Other Util...	-57.41
				1410 University	4310.00 · Water	-82.62
Bill	8/19/19-11033-02	08/19/2019		1121 University	4390.00 · Other Util...	-57.41
				1121 University	4310.00 · Water	-126.30
Bill	8/19/19-11032-04	08/19/2019		1125 University	4390.00 · Other Util...	-57.41
				1125 University	4310.00 · Water	-220.14
TOTAL						-4,556.49
Bill Pmt -Check	**5287**	**08/29/2019**	**H.J. MARTIN & SO...**		**1111.01 · General ...**	
Bill	HJ261475	08/20/2019		carpeting in #...	4430.00 · Maint - C...	-413.77
Bill	HJ261480	08/20/2019		storage door...	4430.00 · Maint - C...	-55.08
Bill	HJ261428	08/20/2019		carpet rolls	4430.25 · Unit Repair	-6,292.32
				carpet rolls	4430.25 · Unit Repair	-1,687.68
Bill	HJ261053	08/20/2019		flooring	4430.25 · Unit Repair	-3,058.04
TOTAL						-11,506.89
Bill Pmt -Check	**5288**	**08/29/2019**	**Jayme Valentine**	**mileage**	**1111.01 · General ...**	
Bill	7/1-7/31/19 mileage	07/31/2019		Mileage	4150.00 · Travel	-18.00
				mileage	4150.00 · Travel	-40.58
TOTAL						-58.58

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Type	Num	Date	Name	Memo	Account	Paid Amount
Bill Pmt -Check	**5289**	**08/29/2019**	**LARSON PAINTING**	**1412 Univeri...**	**1111.01 · General ...**	
Bill	5214	08/07/2019		painting	4430.25 · Unit Repair	-799.48
TOTAL						-799.48
Bill Pmt -Check	**5290**	**08/29/2019**	**Lindeman's Cleani...**		**1111.01 · General ...**	
Bill	92339	08/02/2019		cleaning drap...	4430.01 · Maint - N...	-68.00
Bill	92292	08/02/2019		cleaning drap...	4430.01 · Maint - N...	-54.66
Bill	93404	08/12/2019		repairs to dra...	4430.01 · Maint - N...	-15.00
Bill	94508	08/16/2019		cleaning drap...	4430.01 · Maint - N...	-54.66
Bill	94506	08/16/2019		cleaning drap...	4430.01 · Maint - N...	-50.21
Bill	95419	08/22/2019		cleaning drap...	4430.01 · Maint - N...	-59.10
Bill	95421	08/22/2019		cleaning drap...	4430.01 · Maint - N...	-50.21
TOTAL						-351.84
Bill Pmt -Check	**5291**	**08/29/2019**	**LIZER LAWN CARE**		**1111.01 · General ...**	
Bill	94417AD	08/09/2019		mowing July	4430.13 · Landscap...	-124.50
Bill	94418AD	08/09/2019		mowing july	4430.13 · Landscap...	-49.80
Bill	94397AD	08/09/2019		Mowing July	4430.13 · Landscap...	-124.50
Bill	94447AD	08/09/2019		Mowing July	4430.13 · Landscap...	-99.60
Bill	94442AD	08/09/2019		mowing july	4430.13 · Landscap...	-119.50
TOTAL						-517.90
Bill Pmt -Check	**5292**	**08/29/2019**	**MID-STATE SUPPLY**		**1111.01 · General ...**	
Bill	4301781	08/07/2019		Plumbing kit-...	4420.00 · Maint - S...	-62.64
				Plumbing Kit ...	4420.00 · Maint - S...	-62.64
				Plumbing kit ...	4420.00 · Maint - S...	-62.64
Bill	4303472	08/15/2019		kitchen parts	4420.00 · Maint - S...	-208.20
Bill	4303470	08/15/2019		drip tray	4420.00 · Maint - S...	-35.20
Bill	4303474	08/15/2019		cabinets	4430.25 · Unit Repair	-108.40
Bill	4303543	08/16/2019		cabinets	4430.25 · Unit Repair	-386.90
TOTAL						-926.62
Bill Pmt -Check	**5293**	**08/29/2019**	**Pieper Electric, Inc**	**1424 Admial...**	**1111.01 · General ...**	
Bill	8/15/19	07/31/2019		MM roof towe...	4430.25 · Unit Repair	-10,230.00
TOTAL						-10,230.00
Bill Pmt -Check	**5294**	**08/29/2019**	**Robert Salesky**	**1424 Admira...**	**1111.01 · General ...**	
Bill	25805	08/06/2019		keys	4430.14 · Unit Turn...	-130.80
TOTAL						-130.80
Bill Pmt -Check	**5295**	**08/29/2019**	**SCOTT WARNER ...**		**1111.01 · General ...**	
Bill	114	08/23/2019		patching walls	4430.01 · Maint - N...	-835.00
Bill	114	08/23/2019		disposal of w...	4420.00 · Maint - S...	-1,515.00
TOTAL						-2,350.00

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Type	Num	Date	Name	Memo	Account	Paid Amount
Bill Pmt -Check	**5296**	**08/29/2019**	**SHERWIN-WILLIA...**	**1424 Admira...**	**1111.01 · General ...**	
Bill	3806-9	07/31/2019		paint	4420.00 · Maint - S...	-441.76
TOTAL						-441.76
Bill Pmt -Check	**5297**	**08/29/2019**	**TIME WARNER CA...**	**1424 Admira...**	**1111.01 · General ...**	
Bill	703250601081919	08/19/2019		internet	4230.00 · Ten Ser-...	-24.90
TOTAL						-24.90
Bill Pmt -Check	**5298**	**08/29/2019**	**Tri County Overhe...**	**409 Maple**	**1111.01 · General ...**	
Bill	4066459	07/19/2019		repaced sprin...	4420.00 · Maint - S...	-225.00
TOTAL						-225.00
Bill Pmt -Check	**5299**	**08/29/2019**	**VAN'S FIRE & SAF...**	**1424 Admira...**	**1111.01 · General ...**	
Bill	4125603	07/16/2019		sprinkler insp...	4430.09 · Fire Prote...	-397.50
TOTAL						-397.50
Bill Pmt -Check	**5300**	**08/29/2019**	**WESCO**	**1424 Admira...**	**1111.01 · General ...**	
Bill	643008	07/26/2019		lens	4420.00 · Maint - S...	-506.74
TOTAL						-506.74
Bill Pmt -Check	**5301**	**08/29/2019**	**WISCONSIN PUBL...**		**1111.01 · General ...**	
Bill	8/9/19-2671-00189	08/09/2019		816 N Maple	4320.00 · Electricity	-35.56
				816 N Maple	4330.00 · Gas	-17.95
Bill	8/13/19-2671-00009	08/13/2019		1125 University	4320.00 · Electricity	-27.23
				1125 University	4330.00 · Gas	-16.21
Bill	8/14/19-2671-00190	08/14/2019		1410 University	4320.00 · Electricity	-43.93
				1410 University	4330.00 · Gas	-17.65
Bill	8/14/19-2671-00193	08/14/2019		1412 University	4320.00 · Electricity	-31.83
				1412 University	4330.00 · Gas	-17.28
Bill	Sept 2019 Ur's	09/01/2019		1343 Univers...	4320.01 · Utility Rei...	-67.00
				1420 Univerit...	4320.01 · Utility Rei...	-86.00
				1440 Univers...	4320.01 · Utility Rei...	-86.00
				886 Division -...	4320.01 · Utility Rei...	-89.00
				415 N Maple ...	4320.01 · Utility Rei...	-114.00
				837 Christian...	4320.01 · Utility Rei...	-30.00
				509 S Maple ...	4320.01 · Utility Rei...	-88.00
				913 S Oakla...	4320.01 · Utility Rei...	-36.00
TOTAL						-803.64
Bill Pmt -Check	**5302**	**09/12/2019**	**FIRST SUPPLY G...**		**1111.01 · General ...**	
Bill	11824882-00	08/27/2019		repair kits	4420.00 · Maint - S...	-768.35
Bill	11837426-00	08/29/2019		flapper kit	4420.00 · Maint - S...	-57.70
Bill	11837815-00	08/30/2019		seal kit	4420.00 · Maint - S...	-103.90
Bill	11744999-00	09/05/2019		trip lever	4420.00 · Maint - S...	-146.43
TOTAL						-1,076.38

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Type	Num	Date	Name	Memo	Account	Paid Amount
Bill Pmt -Check	**5303**	**09/12/2019**	**AT&T**	**acct# 920-49...**	**1111.01 · General ...**	
Bill	7/23-8/22/19	08/22/2019		DOOR SYST...	4190.07 · Tele Fax...	-41.58
				DOOR SYST...	4190.07 · Tele Fax...	-41.58
TOTAL						-83.16
Bill Pmt -Check	**5304**	**09/12/2019**	**BELLIN HOME HE...**	**RN commun...**	**1111.01 · General ...**	
Bill	MB3428	08/27/2019		RN commun...	4230.00 · Ten Ser-...	-350.00
TOTAL						-350.00
Bill Pmt -Check	**5305**	**09/12/2019**	**Brown County Plu...**		**1111.01 · General ...**	
Bill	6187	08/30/2019		fix toilet drain	4420.00 · Maint - S...	-132.50
Bill	6188	08/30/2019		repair toilet &...	4420.00 · Maint - S...	-135.80
Bill	6189	08/30/2019		water heater ...	4430.25 · Unit Repair	-1,450.00
TOTAL						-1,718.30
Bill Pmt -Check	**5306**	**09/12/2019**	**Bug Blaster Inc**		**1111.01 · General ...**	
Bill	25556	09/05/2019		bed bugs	4430.17 · Extermin...	-350.00
Bill	25611	09/06/2019		bed bug #408	4430.17 · Extermin...	-140.00
TOTAL						-490.00
Bill Pmt -Check	**5307**	**09/12/2019**	**CITY OF GREEN B...**		**1111.01 · General ...**	
Bill	97-12420	08/27/2019		keys	4420.00 · Maint - S...	-12.00
Bill	970-12420	08/28/2019		tape/pail/outl...	4420.00 · Maint - S...	-44.72
				mowing head	4420.00 · Maint - S...	-29.99
Bill	124086	08/28/2019		bulk waste	4430.19 · Garbage ...	-80.00
Bill	97-12422	08/31/2019		Wages	4110.00 · Admin Sa...	-8,185.99
				Benefits	4182.00 · Employe...	-3,328.45
				Wages	4410.00 · Maint - L...	-9,488.88
				Benefits	4433.00 · Emp Ben...	-3,230.04
				Wages	4110.00 · Admin Sa...	-5,492.11
				Benefits	4182.00 · Employe...	-1,977.83
				Wages	4410.00 · Maint - L...	-4,495.69
				Benefits	4433.00 · Emp Ben...	-1,701.26
				Wages	4110.00 · Admin Sa...	-5,473.63
				Benefits	4182.00 · Employe...	-2,144.06
Bill	970-12420	09/02/2019		Copies	4190.01 · Printing	-81.60
				copies	4190.01 · Printing	-81.61
Bill	124403	09/05/2019		fuel & Parts	4430.03 · Maint - Tr...	-113.20
				fuel & Parts	4430.03 · Maint - Tr...	-113.21
TOTAL						-46,074.27
Bill Pmt -Check	**5308**	**09/12/2019**	**GRAINGER**	**VOID:**	**1111.01 · General ...**	
TOTAL						0.00
Bill Pmt -Check	**5309**	**09/12/2019**	**GREEN BAY WAT...**	**1424 Admira...**	**1111.01 · General ...**	
Bill	8/30/19-4665-01	08/30/2019		1424 Admiral...	4390.00 · Other Util...	-338.00
				1424 Admiral...	4310.00 · Water	-3,665.65
TOTAL						-4,003.65

Green Bay Housing Authority
Check Detail
August through September 2019

Type	Num	Date	Name	Memo	Account	Paid Amount
Bill Pmt -Check	**5310**	**09/12/2019**	**Jayme Valentine**	**mileage**	**1111.01 · General ...**	
Bill	8/1-8/31/19 mileage	08/31/2019		mileage	4150.00 · Travel	-11.50
				mileage	4150.00 · Travel	-63.32
TOTAL						-74.82
Bill Pmt -Check	**5311**	**09/12/2019**	**KONE INC**	**1424 Admial...**	**1111.01 · General ...**	
Bill	959346341	09/01/2019		elevator main...	4430.12 · Elevator ...	-450.00
TOTAL						-450.00
Bill Pmt -Check	**5312**	**09/12/2019**	**LANGAN INVESTI...**		**1111.01 · General ...**	
Bill	8/1-8/31/19 MM	09/03/2019		professional ...	4130.01 · Investigat...	-42.00
Bill	8/1-8/31/19 SS	09/03/2019		background c...	4130.01 · Investigat...	-196.00
TOTAL						-238.00
Bill Pmt -Check	**5313**	**09/12/2019**	**MID-STATE SUPPLY**		**1111.01 · General ...**	
Bill	4306654	09/04/2019		cabnets	4430.25 · Unit Repair	-60.17
Bill	4306651	09/04/2019		cabinets	4430.25 · Unit Repair	-4,230.77
				cabinets	4430.25 · Unit Repair	-920.13
Bill	4307255	09/06/2019		cabinets	4430.25 · Unit Repair	-208.54
Bill	4307253	09/06/2019		cabinets	4430.25 · Unit Repair	-67.00
TOTAL						-5,486.61
Bill Pmt -Check	**5314**	**09/12/2019**	**ORKIN**	**1424 Admial...**	**1111.01 · General ...**	
Bill	184556486	08/27/2019		yearly service	4430.17 · Extermin...	-1,138.18
TOTAL						-1,138.18
Bill Pmt -Check	**5315**	**09/12/2019**	**R&R DRAPERIES**	**1424 Admira...**	**1111.01 · General ...**	
Bill	19149	08/19/2019		2 pair drapes	4420.00 · Maint - S...	-991.00
TOTAL						-991.00
Bill Pmt -Check	**5316**	**09/12/2019**	**Sandberg K9 Solu...**	**inspeciton**	**1111.01 · General ...**	
Bill	1484	08/28/2019		inspection	4430.17 · Extermin...	-100.00
TOTAL						-100.00
Bill Pmt -Check	**5317**	**09/12/2019**	**SCOTT WARNER ...**		**1111.01 · General ...**	
Bill	116	08/28/2019		install cabinets	4420.00 · Maint - S...	-1,250.00
Bill	115	08/29/2019		install doors	4420.00 · Maint - S...	-575.00
TOTAL						-1,825.00
Bill Pmt -Check	**5318**	**09/12/2019**	**Stephanie Schmut...**	**mileage**	**1111.01 · General ...**	
Bill	7/1-9/3/19 mileage	09/03/2019		mileage	4150.00 · Travel	-10.44
TOTAL						-10.44

Green Bay Housing Authority
Check Detail
August through September 2019

Type	Num	Date	Name	Memo	Account	Paid Amount
Bill Pmt -Check	**5319**	**09/12/2019**	**TIME WARNER CA...**	**1424 Admial...**	**1111.01 · General ...**	
Bill	9/2/19	09/02/2019		cable	4230.00 · Ten Ser-...	-2,483.39
TOTAL						-2,483.39
Bill Pmt -Check	**5320**	**09/12/2019**	**WISCONSIN PUBL...**		**1111.01 · General ...**	
Bill	7/19/19-2671-00009	07/19/2019		1125 University	4320.00 · Electricity	-29.94
				1125 University	4330.00 · Gas	-15.09
Bill	8/26/19-2671-00197	08/26/2019		1424 Admial	4330.00 · Gas	-401.19
Bill	8/27/19-2671-00195	08/27/2019		896 School	4320.00 · Electricity	-30.08
				896 School	4330.00 · Gas	-15.71
Bill	8/29/19-2671-00002	08/29/2019		1424 Admial ct	4320.00 · Electricity	-5,451.11
Bill	9/3/19-2671-00194	09/03/2019		323 N ashland	4320.00 · Electricity	-0.08
				323 N ashland	4330.00 · Gas	-0.08
Bill	9/3/19-2671-00193	09/03/2019		1412 University	4320.00 · Electricity	-23.28
				1412 University	4330.00 · Gas	-10.28
TOTAL						-5,976.84
Bill Pmt -Check	**5322**	**09/12/2019**	**GRAINGER**		**1111.01 · General ...**	
Bill	9274313627	08/26/2019		ceiling fan	4420.00 · Maint - S...	-89.72
Bill	9274959650	08/27/2019		gentex	4420.00 · Maint - S...	-1,230.62
Bill	2977818101	08/29/2019		deiling fan	4420.00 · Maint - S...	-84.94
Bill	9278983672	08/30/2019		drain opener	4420.00 · Maint - S...	-108.50
Bill	9278983680	08/30/2019		drain opener	4420.00 · Maint - S...	-108.50
Bill	9278983698	08/30/2019		motor	4420.00 · Maint - S...	-259.42
TOTAL						-1,881.70
Bill Pmt -Check	**5323**	**09/26/2019**	**ABC Supply Co.**	**896 School**	**1111.01 · General ...**	
Bill	84552272	08/27/2019		cabinets	4430.25 · Unit Repair	-2,675.68
TOTAL						-2,675.68
Bill Pmt -Check	**5324**	**09/26/2019**	**ACE DRAIN & SE...**	**1424 Admira...**	**1111.01 · General ...**	
Bill	14276	08/31/2019		auger drain #...	4430.16 · Plumbing	-165.00
TOTAL						-165.00
Bill Pmt -Check	**5325**	**09/26/2019**	**AMA HEATING**	**furnace**	**1111.01 · General ...**	
Bill	J11748	09/17/2019		816 N Maple	4430.10 · Heating a...	-3,790.00
TOTAL						-3,790.00
Bill Pmt -Check	**5326**	**09/26/2019**		**SD refund**	**1111.01 · General ...**	
Bill	SD refund	09/23/2019		SD refund - ...	2114.00 · Tenant S...	-40.00
				Key Dept ref...	2114.02 · Security ...	-40.00
TOTAL						-80.00
Bill Pmt -Check	**5327**	**09/26/2019**		**SD refund**	**1111.01 · General ...**	
Bill	SD Refund	09/25/2019		SD refund - ...	2114.00 · Tenant S...	-700.00
TOTAL						-700.00

Green Bay Housing Authority
Check Detail
August through September 2019

Type	Num	Date	Name	Memo	Account	Paid Amount
Bill Pmt -Check	**5328**	**09/26/2019**	**Brown County Plu...**		**1111.01 · General ...**	
Bill	6204	09/17/2019		new tub & ho...	4420.00 · Maint - S...	-1,450.00
Bill	6205	09/17/2019		cap water lin...	4420.00 · Maint - S...	-103.00
Bill	6206	09/17/2019		fix tub faucet	4420.00 · Maint - S...	-201.80
TOTAL						-1,754.80
Bill Pmt -Check	**5329**	**09/26/2019**	**Bug Blaster Inc**		**1111.01 · General ...**	
Bill	26482	09/19/2019		beg bug treat...	4430.17 · Extermin...	-350.00
Bill	26483	09/19/2019		bed bug treat...	4430.17 · Extermin...	-140.00
TOTAL						-490.00
Bill Pmt -Check	**5330**	**09/26/2019**	**CEC**	**1424 Admira...**	**1111.01 · General ...**	
Bill	318440	08/31/2019		fire door	4420.00 · Maint - S...	-451.00
TOTAL						-451.00
Bill Pmt -Check	**5331**	**09/26/2019**	**CELLCOM**	**cell bill**	**1111.01 · General ...**	
Bill	235374	09/15/2019		cell bill	4190.07 · Tele Fax...	-97.41
				Cell bill	4190.07 · Tele Fax...	-45.39
TOTAL						-142.80
Bill Pmt -Check	**5332**	**09/26/2019**	**CITY OF GREEN B...**		**1111.01 · General ...**	
Bill	970-12420	09/05/2019		screen repair...	4420.00 · Maint - S...	-162.33
Bill	970-12420	09/09/2019		Background ...	4130.01 · Investigat...	-6.96
				background c...	4130.01 · Investigat...	-6.96
Bill	970-12420	09/11/2019		blinds/screws...	4420.00 · Maint - S...	-103.60
Bill	970-12420	09/12/2019		wipers	4430.03 · Maint - Tr...	-17.43
				wipers	4430.03 · Maint - Tr...	-17.43
TOTAL						-314.71
Bill Pmt -Check	**5333**	**09/26/2019**	**Clean By Design L...**		**1111.01 · General ...**	
Bill	1532	09/06/2019		409 N Maple	4430.00 · Maint - C...	-1,154.30
Bill	1533	09/18/2019		896 School	4430.00 · Maint - C...	-950.00
				1428 Dousman	4430.00 · Maint - C...	-950.00
TOTAL						-3,054.30
Bill Pmt -Check	**5334**	**09/26/2019**	**Curtis 1000 Inc**	**Envelopes**	**1111.01 · General ...**	
Bill	5701176	08/23/2019		envelopes	4190.03 · Paper & ...	-245.73
				envelopes	4190.03 · Paper & ...	-245.73
TOTAL						-491.46
Bill Pmt -Check	**5335**	**09/26/2019**	**D & D Glass Co. L...**	**1125 Univeri...**	**1111.01 · General ...**	
Bill	74889	08/26/2019		repair screens	4420.00 · Maint - S...	-24.24
TOTAL						-24.24

Green Bay Housing Authority
Check Detail
August through September 2019

Type	Num	Date	Name	Memo	Account	Paid Amount
Bill Pmt -Check	**5336**	**09/26/2019**	**FIRST SUPPLY G...**		**1111.01 · General ...**	
Bill	11827790-00	09/11/2019		wood seat	4420.00 · Maint - S...	-214.14
Bill	11865012-01	09/18/2019		wood seats/s...	4420.00 · Maint - S...	-71.13
Bill	11865012-00	09/18/2019		seats/tanks/s...	4420.00 · Maint - S...	-692.61
TOTAL						-977.88
Bill Pmt -Check	**5337**	**09/26/2019**	**GRAINGER**		**1111.01 · General ...**	
Bill	9290343798	09/12/2019		ceiling fans &...	4420.00 · Maint - S...	-862.95
Bill	9291962794	09/13/2019		snip set & tin ...	4420.00 · Maint - S...	-88.48
Bill	9291962802	09/13/2019		dehumidifiers	4420.00 · Maint - S...	-354.26
TOTAL						-1,305.69
Bill Pmt -Check	**5338**	**09/26/2019**	**GREEN BAY WAT...**		**1111.01 · General ...**	
Bill	9/18/19-20802-04	09/18/2019		912 S Oakland	4390.00 · Other Util...	-57.41
				912 S Oakland	4310.00 · Water	-220.45
Bill	9/18/19-20454-02	09/18/2019		1577 Charles	4390.00 · Other Util...	-57.41
				1577 Charles	4310.00 · Water	-219.67
TOTAL						-554.94
Bill Pmt -Check	**5339**	**09/26/2019**	**H.J. MARTIN & SO...**		**1111.01 · General ...**	
Bill	HJ260547	09/13/2019		flooring	4430.25 · Unit Repair	-1,552.96
Bill	HJ260546	09/17/2019		flooring	4430.25 · Unit Repair	-6,896.63
TOTAL						-8,449.59
Bill Pmt -Check	**5340**	**09/26/2019**	**Jayme Valentine**	**RAB meeting**	**1111.01 · General ...**	
Bill	RAB meeting	09/13/2019		RAB Meeting	4220.00 · Ten Ser-...	-16.59
TOTAL						-16.59
Bill Pmt -Check	**5341**	**09/26/2019**	**LARSON PAINTING**		**1111.01 · General ...**	
Bill	5224	09/12/2019		painting #417	4420.00 · Maint - S...	-231.80
Bill	5225	09/12/2019		Painting	4430.25 · Unit Repair	-37.09
				painting	4430.25 · Unit Repair	-1,424.41
TOTAL						-1,693.30
Bill Pmt -Check	**5342**	**09/26/2019**	**LIZER LAWN CARE**		**1111.01 · General ...**	
Bill	95810AD	09/12/2019		Aug Mowing	4430.13 · Landscap...	-74.70
Bill	95804AD	09/12/2019		Aug mowoing	4430.13 · Landscap...	-49.80
Bill	95785AD	09/12/2019		Aug Mowing	4430.13 · Landscap...	-99.60
Bill	95765AD	09/12/2019		aug mowing	4430.13 · Landscap...	-74.70
Bill	95766AD	09/12/2019		aug mowing	4430.13 · Landscap...	-99.60
Bill	95784AD	09/12/2019		aug mowing	4430.13 · Landscap...	-24.90
Bill	95809AD	09/12/2019		Aug Mowing	4430.13 · Landscap...	-24.90
Bill	95634	09/12/2019		Fall pesticide...	4430.13 · Landscap...	-1,302.00
TOTAL						-1,750.20

Green Bay Housing Authority
Check Detail
August through September 2019

Type	Num	Date	Name	Memo	Account	Paid Amount
Bill Pmt -Check	**5343**	**09/26/2019**	**Lutheran Social S...**		**1111.01 · General ...**	
Bill	146562	08/31/2019		social worker	4210.00 · Ten Ser-...	-3,429.83
Bill	9/20/19 training	09/20/2019		training in DC	4210.00 · Ten Ser-...	-394.56
TOTAL						-3,824.39
Bill Pmt -Check	**5344**	**09/26/2019**	**MID-STATE SUPPLY**		**1111.01 · General ...**	
Bill	4307938	09/10/2019		1428 Dousman	4430.25 · Unit Repair	-279.51
Bill	4307939	09/10/2019		cabinets	4430.25 · Unit Repair	-33.80
Bill	4307942	09/10/2019		cabinets	4430.00 · Maint - C...	-3,308.50
Bill	4307946	09/10/2019		cabints	4430.25 · Unit Repair	-38.20
TOTAL						-3,660.01
Bill Pmt -Check	**5345**	**09/26/2019**	**PAMPERIN CONS...**		**1111.01 · General ...**	
Bill	9/4/19	09/04/2019		flooring	4430.25 · Unit Repair	-1,956.00
Bill	9/11/19	09/11/2019		flooring	4430.25 · Unit Repair	-1,818.00
TOTAL						-3,774.00
Bill Pmt -Check	**5346**	**09/26/2019**	**SCOTT WARNER ...**		**1111.01 · General ...**	
Bill	120	09/12/2019		sheetrock & ...	4420.00 · Maint - S...	-650.00
Bill	117	09/12/2019		fix door	4420.00 · Maint - S...	-125.00
Bill	119	09/12/2019		kitchen repair...	4420.00 · Maint - S...	-1,940.00
Bill	118	09/12/2019		windows	4430.25 · Unit Repair	-477.22
				windows	4430.00 · Maint - C...	-922.78
Bill	121	09/12/2019		windows	4430.00 · Maint - C...	-1,400.00
TOTAL						-5,515.00
Bill Pmt -Check	**5347**	**09/26/2019**	**Stephanie Schmut...**	**fall waha**	**1111.01 · General ...**	
Bill	2019 fall waha	09/19/2019		2019 fall WA...	4140.00 · Staff Trai...	-193.18
TOTAL						-193.18
Bill Pmt -Check	**5348**	**09/26/2019**	**WISCONSIN MEDIA**	**notice**	**1111.01 · General ...**	
Bill	2767852	08/31/2019		notice	4190.04 · Publicatio...	-68.98
TOTAL						-68.98
Bill Pmt -Check	**5349**	**09/26/2019**	**WISCONSIN PUBL...**		**1111.01 · General ...**	
Bill	9/10/19-2671-00189	09/10/2019		816 N Maple	4320.00 · Electricity	-53.41
				816 N Maple	4330.00 · Gas	-19.76
Bill	9/12/19-2671-00009	09/12/2019		1125 Univeristy	4320.00 · Electricity	-28.30
				1125 Univeristy	4330.00 · Gas	-16.97
Bill	9/12/19-2671-00196	09/12/2019		1125 Univeristy	4320.00 · Electricity	-59.96
				1125 Univeristy	4330.00 · Gas	-23.25
Bill	9/13/19-2671-00190	09/13/2019		1410 Univeristy	4320.00 · Electricity	-41.05
				1410 Univeristy	4330.00 · Gas	-18.29
TOTAL						-260.99

Green Bay Housing Authority
Budget vs. Actual
Summary

Sep-19

	COCC		Mason Manor		RevBonds		ScSite		TOTAL	
	YTD	Budget	YTD	Budget	YTD	Budget	YTD	Budget	YTD	Budget
Total Income	42,523.12	2,525.00	238,749.64	820,095.69	0.00	24,955.00	84,134.45	291,940.58	365,407.21	1,139,516.27
Total Expense	23,959.15	158,300.00	205,386.93	1,154,394.73	15,950.48	717,325.00	139,269.81	639,921.85	384,566.37	2,669,941.58
Net Income	**18,563.97**	**-155,775.00**	**33,362.71**	**-334,299.04**	**-15,950.48**	**-692,370.00**	**-55,135.36**	**-347,981.27**	**-19,159.16**	**-1,530,425.31**

Reserve Spreadsheet

	MM	SS
Projected from 6/30/19	476,008	245,925
YTD Net Income/(loss) Without Depreciation	33,363	(55,135)
Commited Funds	(150,000)	-
Remaining Projects	-	(12,482)
Subtotal	359,371	178,308
Transfer	-	-
Projected Reserve	359,371	178,308
6 Month Expenses	442,264	239,658
Excess/shortfall	(82,893)	(61,350)
	☹	☹

Green Bay Housing Authority
Budget vs. Actual Detail

	COCC				Mason Manor			
	YTD	Budget	$ Over Budget	% of Budget	YTD	Budget	$ Over Budget	% of Budget
Income								
2802.00 · Hud Contributions	0.00	0.00	0.00	0.0%	42,608.50	160,609.00	-118,000.50	26.53%
3110.00 · Dwelling Rental	0.00	0.00	0.00	0.0%	128,246.23	494,266.69	-366,020.46	25.95%
3120.00 · Excess Utilities	0.00	0.00	0.00	0.0%	1,365.00	4,620.00	-3,255.00	29.55%
3510.00 · Management Fee Revenue	32,033.12	0.00	32,033.12	100.0%	0.00	0.00	0.00	0.0%
3520.00 · Asset Management Rev	6,050.00	0.00	6,050.00	100.0%	0.00	0.00	0.00	0.0%
3530.00 · BookKeeping Fee Rev	4,440.00	0.00	4,440.00	100.0%	0.00	0.00	0.00	0.0%
3610.00 · Int Income	0.00	2,500.00	-2,500.00	0.0%	11,685.55	10,000.00	1,685.55	116.86%
3690.00 · Other Income - Tenants	0.00	0.00	0.00	0.0%	2,470.00	8,000.00	-5,530.00	30.88%
3690.01 · Other Income - Ins Dividends	0.00	25.00	-25.00	0.0%	4,142.44	600.00	3,542.44	690.41%
3690.02 · Other Income	0.00	0.00	0.00	0.0%	6,556.80	8,000.00	-1,443.20	81.96%
3690.03 · Cell Tower Rent	0.00	0.00	0.00	0.0%	41,675.12	134,000.00	-92,324.88	31.1%
9110.00 · Transfers In	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
Total Income	42,523.12	2,525.00	39,998.12	1,684.08%	238,749.64	820,095.69	-581,346.05	29.11%
Expense								
4110.00 · Admin Salaries	15,567.70	70,000.00	-54,432.30	22.24%	23,177.28	92,000.00	-68,822.72	25.19%
4120.00 · Compensated Absences	0.00	0.00	0.00	0.0%	0.00	1,000.00	-1,000.00	0.0%
4130.00 · Legal Expense	0.00	350.00	-350.00	0.0%	0.00	2,500.00	-2,500.00	0.0%
4130.01 · Investigations Expense	0.00	0.00	0.00	0.0%	356.40	2,600.00	-2,243.60	13.71%
4140.00 · Staff Training	568.18	7,000.00	-6,431.82	8.12%	0.00	4,000.00	-4,000.00	0.0%
4150.00 · Travel	10.44	750.00	-739.56	1.39%	61.51	200.00	-138.49	30.76%
4160.00 · Management Fee	0.00	0.00	0.00	0.0%	24,511.83	97,055.04	-72,543.21	25.26%
4163.00 · BookKeeping Fee	0.00	0.00	0.00	0.0%	3,397.50	13,680.00	-10,282.50	24.84%
4165.00 · Asset Management Fee	0.00	0.00	0.00	0.0%	4,590.00	18,240.00	-13,650.00	25.16%
4171.00 · Auditing Fees	0.00	1,800.00	-1,800.00	0.0%	0.00	3,600.00	-3,600.00	0.0%
4182.00 · Employee Benefits - Admin	6,996.61	29,500.00	-22,503.39	23.72%	10,581.39	40,000.00	-29,418.61	26.45%
4190.01 · Printing	0.00	1,000.00	-1,000.00	0.0%	812.56	2,500.00	-1,687.44	32.5%
4190.02 · Postage	100.86	300.00	-199.14	33.62%	220.00	1,000.00	-780.00	22.0%
4190.03 · Paper & Office Supplies	114.04	1,500.00	-1,385.96	7.6%	318.33	1,500.00	-1,181.67	21.22%
4190.04 · Publications	68.98	300.00	-231.02	22.99%	0.00	0.00	0.00	0.0%
4190.05 · Membership Dues & Fees	0.00	400.00	-400.00	0.0%	0.00	50.00	-50.00	0.0%
4190.06 · Computer Support	0.00	8,000.00	-8,000.00	0.0%	0.00	12,000.00	-12,000.00	0.0%
4190.07 · Tele Fax & Comm	0.00	0.00	0.00	0.0%	435.83	1,500.00	-1,064.17	29.06%
4190.08 · Marketing	0.00	0.00	0.00	0.0%	966.00	2,300.00	-1,334.00	42.0%
4190.10 · Miscellaneous	0.00	15,000.00	-15,000.00	0.0%	0.00	2,000.00	-2,000.00	0.0%
4210.00 · Ten Ser-Salary	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
4220.00 · Ten Ser-Recr Etc	0.00	0.00	0.00	0.0%	16.59	1,500.00	-1,483.41	1.11%
4220.01 · Ten Ser - Resident Part	0.00	0.00	0.00	0.0%	77.00	3,000.00	-2,923.00	2.57%
4230.00 · Ten Ser-Contrs	0.00	0.00	0.00	0.0%	8,915.06	36,500.00	-27,584.94	24.43%
4310.00 · Water	0.00	0.00	0.00	0.0%	10,922.93	43,000.00	-32,077.07	25.4%
4320.00 · Electricity	0.00	0.00	0.00	0.0%	17,586.09	68,500.00	-50,913.91	25.67%
4320.01 · Utility Reimbursements	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
4330.00 · Gas	0.00	0.00	0.00	0.0%	1,935.23	31,000.00	-29,064.77	6.24%
4390.00 · Other Utilities	0.00	0.00	0.00	0.0%	1,146.00	4,250.00	-3,104.00	26.97%
4410.00 · Maint - Labor	0.00	0.00	0.00	0.0%	24,879.84	127,500.00	-102,620.16	19.51%
4420.00 · Maint - Supplies	0.00	100.00	-100.00	0.0%	16,715.60	67,000.00	-50,284.40	24.95%
4430.00 · Maint - Contracts	0.00	0.00	0.00	0.0%	3,893.77	37,219.69	-33,325.92	10.46%
4430.01 · Maint - Non-Contract	0.00	0.00	0.00	0.0%	744.24	5,500.00	-4,755.76	13.53%
4430.03 · Maint - Truck Maint	0.44	400.00	-399.56	0.11%	1,043.52	2,500.00	-1,456.48	41.74%
4430.09 · Fire Protection - Maint	0.00	0.00	0.00	0.0%	397.50	9,000.00	-8,602.50	4.42%
4430.10 · Heating and Cooling	0.00	0.00	0.00	0.0%	1,842.70	5,000.00	-3,157.30	36.85%
4430.11 · Snow Removal	0.00	0.00	0.00	0.0%	7,195.00	12,500.00	-5,305.00	57.56%
4430.12 · Elevator Maintenance	0.00	0.00	0.00	0.0%	1,350.00	10,500.00	-9,150.00	12.86%
4430.13 · Landscape and Grounds	0.00	0.00	0.00	0.0%	161.47	8,000.00	-7,838.53	2.02%
4430.15 · Electrical	0.00	0.00	0.00	0.0%	0.00	1,000.00	-1,000.00	0.0%
4430.16 · Plumbing	0.00	0.00	0.00	0.0%	165.00	1,750.00	-1,585.00	9.43%
4430.17 · Extermination	0.00	0.00	0.00	0.0%	7,813.16	23,000.00	-15,186.84	33.97%
4430.18 · Appliances	0.00	0.00	0.00	0.0%	0.00	5,000.00	-5,000.00	0.0%
4430.19 · Garbage & Trash Removal	0.00	0.00	0.00	0.0%	1,613.08	3,500.00	-1,886.92	46.09%
4430.25 · Unit Repair	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
4432.00 · Extraordinary Maintenance	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
4433.00 · Emp Ben Contr-ord maint	0.00	0.00	0.00	0.0%	10,188.22	47,000.00	-36,811.78	21.68%
4480.00 · Protect Service	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
4510.00 · Insurance Expense - Property	0.00	0.00	0.00	0.0%	10,606.50	10,100.00	506.50	105.02%
4510.01 · Insurance Expenses - Liability	232.00	225.00	7.00	103.11%	6,619.00	6,100.00	519.00	108.51%
4520.00 · PILOT	0.00	0.00	0.00	0.0%	0.00	33,750.00	-33,750.00	0.0%
4530.00 · Bank Fees	299.90	1,025.00	-725.10	29.26%	0.00	0.00	0.00	0.0%
4572.00 · Bad Debt - Tenant Rents	0.00	0.00	0.00	0.0%	0.00	13,000.00	-13,000.00	0.0%
4590.00 · Other General	0.00	20,000.00	-20,000.00	0.0%	0.00	0.00	0.00	0.0%
4800.00 · Depreciation Expense	0.00	650.00	-650.00	0.0%	0.00	215,000.00	-215,000.00	0.0%
9120.00 · Transfers Out	0.00	0.00	0.00	0.0%	0.00	25,000.00	-25,000.00	0.0%
Total Expense	23,959.15	158,300.00	-134,340.85	15.14%	205,386.93	1,154,394.73	-949,007.80	17.79%
Net Income/(Loss)	**18,563.97**	**-155,775.00**	**174,338.97**	**-11.92%**	**33,362.71**	**-334,299.04**	**367,661.75**	**-9.98%**

Green Bay Housing Authority
Budget vs. Actual Detail

	RevBonds				ScSite			
	YTD	Budget	$ Over Budget	% of Budget	YTD	Budget	$ Over Budget	% of Budget
Income								
2802.00 · Hud Contributions	0.00	0.00	0.00	0.0%	41,434.00	143,472.00	-102,038.00	28.88%
3110.00 · Dwelling Rental	0.00	0.00	0.00	0.0%	40,372.62	130,468.58	-90,095.96	30.94%
3120.00 · Excess Utilities	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
3510.00 · Management Fee Revenue	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
3520.00 · Asset Management Rev	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
3530.00 · BookKeeping Fee Rev	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
3610.00 · Int Income	0.00	10,000.00	-10,000.00	0.0%	0.00	7,500.00	-7,500.00	0.0%
3690.00 · Other Income - Tenants	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
3690.01 · Other Income - Ins Dividends	0.00	0.00	0.00	0.0%	0.00	1,500.00	-1,500.00	0.0%
3690.02 · Other Income	0.00	14,955.00	-14,955.00	0.0%	2,327.83	9,000.00	-6,672.17	25.87%
3690.03 · Cell Tower Rent	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
9110.00 · Transfers In	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
Total Income	0.00	24,955.00	-24,955.00	0.0%	84,134.45	291,940.58	-207,806.13	28.82%
Expense								
4110.00 · Admin Salaries	0.00	1,000.00	-1,000.00	0.0%	14,022.78	64,000.00	-49,977.22	21.91%
4120.00 · Compensated Absences	0.00	0.00	0.00	0.0%	0.00	2,000.00	-2,000.00	0.0%
4130.00 · Legal Expense	0.00	0.00	0.00	0.0%	359.15	1,500.00	-1,140.85	23.94%
4130.01 · Investigations Expense	0.00	0.00	0.00	0.0%	1,291.20	3,500.00	-2,208.80	36.89%
4140.00 · Staff Training	0.00	0.00	0.00	0.0%	0.00	4,000.00	-4,000.00	0.0%
4150.00 · Travel	0.00	0.00	0.00	0.0%	168.17	500.00	-331.83	33.63%
4160.00 · Management Fee	0.00	0.00	0.00	0.0%	7,521.29	31,926.00	-24,404.71	23.56%
4163.00 · BookKeeping Fee	0.00	0.00	0.00	0.0%	1,042.50	4,500.00	-3,457.50	23.17%
4165.00 · Asset Management Fee	0.00	0.00	0.00	0.0%	1,460.00	6,000.00	-4,540.00	24.33%
4171.00 · Auditing Fees	0.00	525.00	-525.00	0.0%	0.00	3,400.00	-3,400.00	0.0%
4182.00 · Employee Benefits - Admin	0.00	300.00	-300.00	0.0%	5,879.76	26,500.00	-20,620.24	22.19%
4190.01 · Printing	0.00	0.00	0.00	0.0%	454.82	600.00	-145.18	75.8%
4190.02 · Postage	0.00	0.00	0.00	0.0%	220.00	1,000.00	-780.00	22.0%
4190.03 · Paper & Office Supplies	0.00	0.00	0.00	0.0%	318.33	800.00	-481.67	39.79%
4190.04 · Publications	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
4190.05 · Membership Dues & Fees	0.00	0.00	0.00	0.0%	0.00	50.00	-50.00	0.0%
4190.06 · Computer Support	0.00	0.00	0.00	0.0%	0.00	6,750.00	-6,750.00	0.0%
4190.07 · Tele Fax & Comm	0.00	0.00	0.00	0.0%	283.87	1,200.00	-916.13	23.66%
4190.08 · Marketing	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
4190.10 · Miscellaneous	0.00	500.00	-500.00	0.0%	0.00	500.00	-500.00	0.0%
4210.00 · Ten Ser-Salary	7,254.22	5,000.00	2,254.22	145.08%	0.00	0.00	0.00	0.0%
4220.00 · Ten Ser-Recr Etc	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
4220.01 · Ten Ser - Resident Part	0.00	0.00	0.00	0.0%	0.00	1,250.00	-1,250.00	0.0%
4230.00 · Ten Ser-Contrs	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
4310.00 · Water	0.00	0.00	0.00	0.0%	6,842.21	25,000.00	-18,157.79	27.37%
4320.00 · Electricity	0.00	0.00	0.00	0.0%	708.35	1,500.00	-791.65	47.22%
4320.01 · Utility Reimbursements	0.00	0.00	0.00	0.0%	2,722.00	0.00	2,722.00	100.0%
4330.00 · Gas	0.00	0.00	0.00	0.0%	317.83	1,500.00	-1,182.17	21.19%
4390.00 · Other Utilities	0.00	0.00	0.00	0.0%	2,409.20	10,000.00	-7,590.80	24.09%
4410.00 · Maint - Labor	0.00	0.00	0.00	0.0%	14,443.32	46,000.00	-31,556.68	31.4%
4420.00 · Maint - Supplies	0.00	0.00	0.00	0.0%	17,250.40	39,000.00	-21,749.60	44.23%
4430.00 · Maint - Contracts	0.00	0.00	0.00	0.0%	5,377.08	39,059.85	-33,682.77	13.77%
4430.01 · Maint - Non-Contract	0.00	0.00	0.00	0.0%	835.00	38,286.00	-37,451.00	2.18%
4430.03 · Maint - Truck Maint	0.00	0.00	0.00	0.0%	290.53	2,500.00	-2,209.47	11.62%
4430.09 · Fire Protection - Maint	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
4430.10 · Heating and Cooling	0.00	0.00	0.00	0.0%	0.00	1,500.00	-1,500.00	0.0%
4430.11 · Snow Removal	0.00	0.00	0.00	0.0%	0.00	1,500.00	-1,500.00	0.0%
4430.12 · Elevator Maintenance	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
4430.13 · Landscape and Grounds	0.00	0.00	0.00	0.0%	3,893.80	11,000.00	-7,106.20	35.4%
4430.15 · Electrical	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
4430.16 · Plumbing	0.00	0.00	0.00	0.0%	175.00	7,000.00	-6,825.00	2.5%
4430.17 · Extermination	0.00	0.00	0.00	0.0%	1,275.00	1,500.00	-225.00	85.0%
4430.18 · Appliances	0.00	0.00	0.00	0.0%	0.00	1,000.00	-1,000.00	0.0%
4430.19 · Garbage & Trash Removal	0.00	0.00	0.00	0.0%	630.60	1,000.00	-369.40	63.06%
4430.25 · Unit Repair	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
4432.00 · Extraordinary Maintenance	8,696.26	710,000.00	-701,303.74	1.23%	0.00	0.00	0.00	0.0%
4433.00 · Emp Ben Contr-ord maint	0.00	0.00	0.00	0.0%	6,110.12	16,000.00	-9,889.88	38.19%
4480.00 · Protect Service	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
4510.00 · Insurance Expense - Property	0.00	0.00	0.00	0.0%	40,339.50	40,000.00	339.50	100.85%
4510.01 · Insurance Expenses - Liability	0.00	0.00	0.00	0.0%	2,628.00	3,600.00	-972.00	73.0%
4520.00 · PILOT	0.00	0.00	0.00	0.0%	0.00	32,000.00	-32,000.00	0.0%
4530.00 · Bank Fees	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
4572.00 · Bad Debt - Tenant Rents	0.00	0.00	0.00	0.0%	0.00	12,000.00	-12,000.00	0.0%
4590.00 · Other General	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
4800.00 · Depreciation Expense	0.00	0.00	0.00	0.0%	0.00	149,000.00	-149,000.00	0.0%
9120.00 · Transfers Out	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%
Total Expense	15,950.48	717,325.00	-701,374.52	2.22%	139,269.81	639,921.85	-500,652.04	21.76%
Net Income/(Loss)	**-15,950.48**	**-692,370.00**	**676,419.52**	**2.3%**	**-55,135.36**	**-347,981.27**	**292,845.91**	**15.84%**

Green Bay Housing Authority
Budget vs. Actual Detail

	TOTAL			
	YTD	Budget	$ Over Budget	% of Budget
Income				
2802.00 · Hud Contributions	84,042.50	304,081.00	-220,038.50	0.28
3110.00 · Dwelling Rental	168,618.85	624,735.27	-456,116.42	0.27
3120.00 · Excess Utilities	1,365.00	4,620.00	-3,255.00	0.30
3510.00 · Management Fee Revenue	32,033.12	0.00	32,033.12	1.00
3520.00 · Asset Management Rev	6,050.00	0.00	6,050.00	1.00
3530.00 · BookKeeping Fee Rev	4,440.00	0.00	4,440.00	1.00
3610.00 · Int Income	11,685.55	30,000.00	-18,314.45	0.39
3690.00 · Other Income - Tenants	2,470.00	8,000.00	-5,530.00	0.31
3690.01 · Other Income - Ins Dividends	4,142.44	2,125.00	2,017.44	1.95
3690.02 · Other Income	8,884.63	31,955.00	-23,070.37	0.28
3690.03 · Cell Tower Rent	41,675.12	134,000.00	-92,324.88	0.31
9110.00 · Transfers In	0.00	0.00	0.00	0.00
Total Income	365,407.21	1,139,516.27	-774,109.06	32.07%
Expense				
4110.00 · Admin Salaries	52,767.76	227,000.00	-174,232.24	23.25%
4120.00 · Compensated Absences	0.00	3,000.00	-3,000.00	0.0%
4130.00 · Legal Expense	359.15	4,350.00	-3,990.85	8.26%
4130.01 · Investigations Expense	1,647.60	6,100.00	-4,452.40	27.01%
4140.00 · Staff Training	568.18	15,000.00	-14,431.82	3.79%
4150.00 · Travel	240.12	1,450.00	-1,209.88	16.56%
4160.00 · Management Fee	32,033.12	128,981.04	-96,947.92	24.84%
4163.00 · BookKeeping Fee	4,440.00	18,180.00	-13,740.00	24.42%
4165.00 · Asset Management Fee	6,050.00	24,240.00	-18,190.00	24.96%
4171.00 · Auditing Fees	0.00	9,325.00	-9,325.00	0.0%
4182.00 · Employee Benefits - Admin	23,457.76	96,300.00	-72,842.24	24.36%
4190.01 · Printing	1,267.38	4,100.00	-2,832.62	30.91%
4190.02 · Postage	540.86	2,300.00	-1,759.14	23.52%
4190.03 · Paper & Office Supplies	750.70	3,800.00	-3,049.30	19.76%
4190.04 · Publications	68.98	300.00	-231.02	22.99%
4190.05 · Membership Dues & Fees	0.00	500.00	-500.00	0.0%
4190.06 · Computer Support	0.00	26,750.00	-26,750.00	0.0%
4190.07 · Tele Fax & Comm	719.70	2,700.00	-1,980.30	26.66%
4190.08 · Marketing	966.00	2,300.00	-1,334.00	42.0%
4190.10 · Miscellaneous	0.00	18,000.00	-18,000.00	0.0%
4210.00 · Ten Ser-Salary	7,254.22	5,000.00	2,254.22	145.08%
4220.00 · Ten Ser-Recr Etc	16.59	1,500.00	-1,483.41	1.11%
4220.01 · Ten Ser - Resident Part	77.00	4,250.00	-4,173.00	1.81%
4230.00 · Ten Ser-Contrs	8,915.06	36,500.00	-27,584.94	24.43%
4310.00 · Water	17,765.14	68,000.00	-50,234.86	26.13%
4320.00 · Electricity	18,294.44	70,000.00	-51,705.56	26.14%
4320.01 · Utility Reimbursements	2,722.00	0.00	2,722.00	100.0%
4330.00 · Gas	2,253.06	32,500.00	-30,246.94	6.93%
4390.00 · Other Utilities	3,555.20	14,250.00	-10,694.80	24.95%
4410.00 · Maint - Labor	39,323.16	173,500.00	-134,176.84	22.67%
4420.00 · Maint - Supplies	33,966.00	106,100.00	-72,134.00	32.01%
4430.00 · Maint - Contracts	9,270.85	76,279.54	-67,008.69	12.15%
4430.01 · Maint - Non-Contract	1,579.24	43,786.00	-42,206.76	3.61%
4430.03 · Maint - Truck Maint	1,334.49	5,400.00	-4,065.51	24.71%
4430.09 · Fire Protection - Maint	397.50	9,000.00	-8,602.50	4.42%
4430.10 · Heating and Cooling	1,842.70	6,500.00	-4,657.30	28.35%
4430.11 · Snow Removal	7,195.00	14,000.00	-6,805.00	51.39%
4430.12 · Elevator Maintenance	1,350.00	10,500.00	-9,150.00	12.86%
4430.13 · Landscape and Grounds	4,055.27	19,000.00	-14,944.73	21.34%
4430.15 · Electrical	0.00	1,000.00	-1,000.00	0.0%
4430.16 · Plumbing	340.00	8,750.00	-8,410.00	3.89%
4430.17 · Extermination	9,088.16	24,500.00	-15,411.84	37.1%
4430.18 · Appliances	0.00	6,000.00	-6,000.00	0.0%
4430.19 · Garbage & Trash Removal	2,243.68	4,500.00	-2,256.32	49.86%
4430.25 · Unit Repair	0.00	0.00	0.00	0.0%
4432.00 · Extraordinary Maintenance	8,696.26	710,000.00	-701,303.74	1.23%
4433.00 · Emp Ben Contr-ord maint	16,298.34	63,000.00	-46,701.66	25.87%
4480.00 · Protect Service	0.00	0.00	0.00	0.0%
4510.00 · Insurance Expense - Property	50,946.00	50,100.00	846.00	101.69%
4510.01 · Insurance Expenses - Liability	9,479.00	9,925.00	-446.00	95.51%
4520.00 · PILOT	0.00	65,750.00	-65,750.00	0.0%
4530.00 · Bank Fees	299.90	1,025.00	-725.10	29.26%
4572.00 · Bad Debt - Tenant Rents	0.00	25,000.00	-25,000.00	0.0%
4590.00 · Other General	0.00	20,000.00	-20,000.00	0.0%
4800.00 · Depreciation Expense	0.00	364,650.00	-364,650.00	0.0%
9120.00 · Transfers Out	0.00	25,000.00	-25,000.00	0.0%
Total Expense	384,566.37	2,669,941.58	-2,285,375.21	14.4%
Net Income/(Loss)	**-19,159.16**	**-1,530,425.31**	**1,511,266.15**	**1.25%**

LANGAN & ASSOCIATES
Experienced Investigators and Consultants

1723 Murphy Court, Green Bay, WI 54303 • Phone: 920-494-9910 • www.LanganAndAssociates.com

September 3, 2019

Jayme Valentine
Senior Property Manager
Housing Authority of City of Green Bay
1424 Admiral Court
Green Bay, WI 54303

Re: Monthly Report:

Ms. Valentine,

For the month of August 2019 there were 17 Green Bay Housing applications reviewed. They were:

3 Applications for Mason Manor.

14 Applications for Scattered Sites.

I do not have a count of the fraud investigations still open or closed in August 2019.

Should there be any questions please feel free to contact me at (920) 639-6667.

Respectfully submitted,

Ken Brodhagen

Ken Brodhagen, Investigator
Langan & Associates, Inc.

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October 1, 2019

Jayme Valentine
Senior Property Manager
Housing Authority of City of Green Bay
1424 Admiral Court
Green Bay, WI 54303

Re: Monthly Report:

Ms. Valentine,

For the month of September 2019 there were 26 Green Bay Housing applications reviewed. They were:

9 Applications for Mason Manor.

17 Applications for Scattered Sites.

I do not have a count of the fraud investigations still open or closed in September 2019.

Should there be any questions please feel free to contact me at (920) 639-6667.

Respectfully submitted,

Ken Brodhagen

Ken Brodhagen, Investigator
Langan & Associates, Inc.

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GREEN BAY HOUSING AUTHORITY
(OCTOBER 2019)

			MASON MANOR VACANCIES (1 TOTAL)		
UNIT	MOVEOUT	BEDRM	NEW LEASE	MOVE OUT REASON	CURRENT STATUS OF UNIT
###	8/1/19	1	?	EVICTION-PEST CONTROL/HOUSEKEEPING	UNIT TURNOVER
			SCATTERED SITES VACANCIES (4 TOTAL)		
###	5/1/19	4	?	IN HOUSE TRANSFER TO MASON MANOR	UNIT TURNOVER
###	6/1/19	3	?	EVICTION-SMOKING	UNIT TURNOVER
###	7/5/19	4	?	MOVED OUT TO LIVE W/CHILDREN	UNIT TURNOVER
###	10/1/19	4	?	IN HOUSE TRANSFER	UNIT TURNOVER

UPCOMING VACANCIES			APPLICATIONS INFO	
	MASON MANOR (1 TOTAL)		MM APPLICANTS:	TOTAL
	UNIT	STATUS	1 bedroom (55-BC; 31-non BC)	86
	###	NURSING HOME	2 bedroom (1-BC; 1-non BC)	2
	SCATTERED S. (2 TOTAL)		SS APPLICANTS:	TOTAL
	UNIT	STATUS	2 bedroom (25-BC; 8-non BC)	33
	###	BOUGHT A HOME	3 bedroom (10-BC; 14-non BC)	24
	###	EVICTION- SMOKING	4 bedroom (3-BC; 0 non BC)	3
	MOVE IN/OUT #'S		46 NEW MOVE INS	49 MOVE OUTS

	OCCUPANY RATES			HUD	
	MM	SS	GBHA	MM	SS
	MM	SS	GBHA	MM	SS
Oct	99.34%	94.00%	96.67%	99.34%	94.00%
Nov	97.37%	92.00%	94.68%	97.37%	92.00%
Dec	98.03%	96.00%	97.01%	98.68%	96.00%
Jan	98.03%	96.00%	97.01%	98.68%	96.00%
Feb	99.34%	97.92%	98.63%	100.00%	100.00%
March	97.37%	95.83%	96.60%	98.03%	97.92%
April	99.34%	97.92%	98.63%	99.34%	97.92%
May	98.03%	97.92%	97.97%	98.03%	97.92%
June	98.68%	97.92%	98.30%	98.68%	100.00%
July	98.68%	95.83%	97.26%	98.68%	97.92%
Aug	98.68%	93.75%	96.22%	98.68%	95.83%
Sept	99.34%	93.75%	96.55%	98.68%	95.83%
TOTAL	98.52%	95.74%	97.13%	98.68%	96.78%