Streamlined Annual PHA Plan *(High Performer PHAs)*	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

Definitions.

(1) ***High-Performer PHA*** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.

(2) ***Small PHA*** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.

(3) ***Housing Choice Voucher (HCV) Only PHA*** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment, and does not own or manage public housing.

(4) ***Standard PHA*** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.

(5) ***Troubled PHA*** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.

(6) ***Qualified PHA*** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A. PHA Information

A.1

PHA Name: Pickaway Metropolitan Housing Authority **PHA Code:** OH059
PHA Type: ☐ Small ☒ High Performer
PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/2017
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
Number of Public Housing (PH) Units 108 **Number of Housing Choice Vouchers (HCVs)** 635
Total Combined 743
PHA Plan Submission Type: ☒ Annual Submission ☐ Revised Annual Submission

Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.
The Pickaway MHA 2017 Plan will be on display in the office of the Pickaway MHA, the office of the Public Housing Manager, the Housing Choice Voucher Manager's Office, the Office of the Executive Director, and on the PMHA Website. The members of the Pickaway MHA Advisory Board will receive a copy of this document as well as each Pickaway MHA Board of Commissioners member. Copies will also be provided to local elected officials and other appropriate officials for review.

☐ **PHA Consortia:** (Check box if submitting a Joint PHA Plan and complete table below)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA since its last **Annual PHA Plan** submission?

Y	N	
☒	☐	Statement of Housing Needs and Strategy for Addressing Housing Needs.
☒	☐	Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
☐	☒	Financial Resources.
☐	☒	Rent Determination.
☐	☒	Homeownership Programs.
☒	☐	Safety and Crime Prevention.
☐	☒	Pet Policy.
☐	☒	Substantial Deviation.
☐	☒	Significant Amendment/Modification

(b) The PHA must submit its Deconcentration Policy for Field Office Review. **The Deconcentration Policy is included in section B.1(b) of the Annual Plan**

(c) If the PHA answered yes for any element, describe the revisions for each element below: **The updated elements are included in the Annual Plan for Statement of Housing Needs & Strategy for Addressing Housing Needs, Deconcentration, and in the Safety and Crime Prevention segments of the Plan.**

B.2 New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?

Y	N	
☐	☒	Hope VI or Choice Neighborhoods.
☐	☒	Mixed Finance Modernization or Development.
☒	☐	Demolition and/or Disposition.
☐	☒	Conversion of Public Housing to Tenant Based Assistance.
☒	☐	Conversion of Public Housing to Project-Based Assistance under RAD.
☐	☒	Project Based Vouchers.
☐	☒	Units with Approved Vacancies for Modernization.
☐	☒	Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.
Demolition and/or Disposition – the agency is currently waiting on the Field Office recommendation for disposition of a property purchased previously but not developed and under OIG instruction to sell. The decision will include what the subsequent funding should be used for and is discussed in the text of the Annual Plan. The agency is currently considering and researching the possibility of pursuing a RAD program but has not made any commitment toward doing so as of the writing of the plan.

B.3 Progress Report.

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.
The agency's progress in meeting it's Missions and Goals is included in the text of the Annual Plan under Section B.3. The main provisions of the text include the agency obtaining additional VASH vouchers, the agency goal to strengthen the FSS program by applying for and receiving the FUP/FSS Demonstration Grant, and the administration of the CHIP program on behalf of the City's CDBG program. PMHA staff continues to serve on Boards and Commissions within our jurisdiction and is committed to training and enforcing Fair Housing requirements. Discussion in the text includes our review and commitment to VAWA, our Capital Fund program and our desire to provide affordable, decent, safe and sanitary housing to low-income residents of the jurisdiction. This includes commitment to energy efficiency improvements in our public housing stock, implementing Smoke Free Housing and enforcing quick and efficient unit turnaround.

B.4. Most Recent Fiscal Year Audit.

(a) Were there any findings in the most recent FY Audit?

Y	N
☐	☒

(b) If yes, please describe:

	Other Document and/or Certification Requirements.
C.1	**Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan** Form 50077-ST-HCV-HP, *Certification of Compliance with PHA Plans and Related Regulations,* must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.2	**Civil Rights Certification.** Form 50077-ST-HCV-HP, *Certification of Compliance with PHA Plans and Related Regulations,* must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.3	**Resident Advisory Board (RAB) Comments.** (a) Did the RAB(s) provide comments to the PHA Plan? Y N ☒ ☐ If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
C.4	**Certification by State or Local Officials.** Form HUD 50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan,* must be submitted by the PHA as an electronic attachment to the PHA Plan.
D	**Statement of Capital Improvements.** Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).
D.1	**Capital Improvements.** Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD. The most recent 5-Year Action Plan was approved by HUD on June 30, 2016. A summary of potential projects from that Plan is included in D.1 of the Annual Plan.

PHA ANNUAL PLAN
PICKAWAY METROPOLITAN HOUSING AUTHORITY
FY BEGINNING 01/2017

A1. Availability of Information

The Pickaway Metropolitan Housing Authority Annual Plan will be on display in the lobby of the agency located at 176 Rustic Drive; Circleville, Ohio 43113. Copies of the plan will also be located in the offices of the Executive Director, the Public Housing Manager and the Housing Choice Voucher Manager. PMHA will post a copy of the Annual Plan on the Agency website. Each member of the Advisory Council will be given a copy of the Plan, as will each PMHA Commissioner. Copies of the plan are provided to the Pickaway County Commissioners and the Mayor of the City of Circleville. Copies are available to the general public at a cost of .25 per page.

B. Annual Plan Elements
B.(a) and B(c) Revision of PHA Plan Elements and Descriptions of Revisions

Statement of Housing Needs and Strategy for Addressing Housing Needs

Statistical information provided in this section is the statistical data that appeared in the 2015 Five Year and Annual Plan and 2016 Annual Plan.

As part of the Annual Plan process, PMHA completes an analysis of existing housing and an analysis of impediments to housing. The information used in preparation of the analysis provides insight into demographic and housing needs within our jurisdiction using the most recent CHIS Information that may be available, U.S. Census Bureau data, comparison of our agency statistics and relative conclusions drawn to this information.

Demographics: Pickaway County, Ohio is a historic, small and rural county in South-Central Ohio, with industrial, agricultural and service sectors. Pickaway County is located within the Columbus Metropolitan Statistical Area. Population according to recent U.S. Census Bureau data is listed as 55,698.

Population: The population of Pickaway County has grown slightly since the most recent census. Pickaway County's residential cities and villages, particularly Circleville and areas north and east, are viewed as "bedroom communities" when related to Columbus and Lancaster. Persons who do not wish to live in a larger city but who want proximity to the greater Columbus area or other locations with enhanced employment opportunities may choose to live in Pickaway County. This availability of rural living in close proximity to an urban area has resulted in an increase of residents from outside the agency's jurisdiction, but these individuals are those with reliable transportation and employment that allows them affordability of higher priced housing. In actuality, the loss of industry and large scale employers have slowed the rate of growth in Pickaway County overall. Lower income persons, without reliable transportation and needing a variety of employment opportunities apply for agency housing programs that will allow portability or location in the northern part of Pickaway County.

Population with respect to Race and Ethnicity: From a race and ethnicity demographic, Non-Hispanic or Latino persons number 55,023, representing 99% of the county's population. By race, statistically Pickaway County is 95% White, 3.4 African American, <.5% Asian, <.5%

American Indian, <.5 Native Hawaiian or Pacific Islander, <.5% other ethnicities, and 1.1% are Hispanic or Latino.

Upon opening the waiting list in July, 2015, PMHA experienced a significant number of applicants from outside the Pickaway County area, most specifically from Franklin County. The vast majority of these applicants were solely interested in the Housing Choice Voucher program due to the portability feature. Of these applicants, a majority were of Somali descent. Currently approximately 10 of these applicants are participating in the Housing Choice Voucher program. There is one family participating in the public housing program. These participants will not impact the statistical information quoted here, but do require the completion of a LEP and LAP for our agency.

Population with Respect to Age: There are 14,686 persons with age ranging from birth to 19 years of age, representing 26% of the county population. Persons with age ranging from 20 to 49 years total 41% of the population, while an overlapping statistic shows that persons in the age range of 25-64 number 65% of the population. Those considered "elderly", in the 65-84 year age range total only 13% of the population, but as persons continue to age while residing in Pickaway County, this number will increase, especially if growth remains steady or population decreases.

Population with Respect to Gender: Males in Pickaway County are 53% of the population with females numbering 47%. Census Bureau data documents 73% of the households in Pickaway County as family households. Of those households, 73% feature a male head of household and 27% feature a female head of household.

Population with Respect to Income Concentrations: Information from the Census Bureau indicates the Median Income for a family of four in Pickaway County is $53,750. Of the total households in Pickaway County, 21% have less than $25,000 income annually. Of those households, 6% have income of less than $10,000, 4% have income between $10,000 to $14,999 and 10% have income between $15,000 to $24,999. 61% have income between $25,000 to $100,000.

Population with Respect to Disability: U.S. Census Bureau Data documents 4,005 Pickaway County males have documented disabilities. Of this group, 90% are 20 years of age or older and 64% are between the ages of 21-64. There are 3,911 females with documented disabilities. Of the female group, 94% are 20 years of age or older and 61% are between the ages of 21-64.

Population with Respect to Housing: There are 19,624 (925) occupied housing units in Pickaway County according to the Census Bureau. Of those, 26% are renter occupied. The largest group of the population that rent homes are those who are 25-44 years of age (43%). The elderly, age 65 years of age and older, represent 16% of renters.

Renter occupied housing units primarily serve households of 2.5 persons. Of occupied units paying rent, 20% pay $499 or less per month in rent; 54% pay $500-749 per month in rent and 36% pay 750-$999 per month in rent.

Population with Respect to Language: 98.6% of the population of Pickaway County speaks English only. Those speaking a language other than English represent 1.4% of the population, and .8% of those individuals speak Spanish.

Housing Availability to Moderate Income and LMI Households: Two of the largest providers to LMI households are the local Housing Authority and Community Action Agency. PMHA maintains waiting lists for all properties managed by the agency. The Housing Choice Voucher wait list has approximately 394 applicants on the list. Because the waiting list was depleted before opening for the period of July, 2015, all applicants on the current wait list are 2015 applicants. The wait list, when closed on July 31, 2015 held over 500 applicants. The public housing program maintains waiting lists by bedroom size and currently lists 331 applicants. A 16 unit Rural Development property has a waiting list of 92 applicants, and the three properties that are managed by PMHA have a total of 138 applicants on wait lists. Occupancy exceeds 98% at this time.

The PMHA Housing Choice Voucher Program is authorized to issue 635 vouchers monthly with actual voucher utilization average 621 in the first six months of 2016, a 4.3% increase from 2015. Budget authority used however exceeds 100% to-date in 2016, with PMHA using reserves to supplement HAP. Approximately one-fourth of voucher recipients receive Utility Allowance assistance. Additionally, voucher assistance is provided for several residents of the Tax Credit properties owned by the Community Action Agency and other private developers.

Private Market Response: The private market has provided sufficient housing in response to the needs of those seeking to obtain homeownership, however the local economy has experienced the same reluctant move to private ownership as has all parts of the United States. LMI families often lack credit and buying power in the private market. Credit problems and lack of established employment history can curtail any hope of borrowing funds for homeownership in a time when lenders have tightened mortgage lending criteria.

Local County and Circleville City elected officials have worked diligently to improve the economic picture for Pickaway County. As a result of their efforts, a major industrial manufacturer has selected Pickaway County as the location for a paper products manufacturing facility. Construction of the facility is underway and our hope is that our program participants will use the employment opportunities of this large-scale employer to move toward self-sufficiency.

Unfortunately many older homes and smaller homes are available as rentals to those low-to-moderate income residents. These homes sometimes border begin substandard and require rehab to meet HQS requirements.

Assessment of Housing Policies

We have no local media in any language other than English, thus language barriers would exist for those who are not fluent in the English language. For persons seeking housing through assisted housing programs, the local housing authority has access to program-related documents that have been translated by HUD and printed in various languages. The language barrier issue is not encountered on a regular basis but the opening of the Housing Choice Voucher waiting list in July, 2015 resulted in a number of applicants from the Franklin County area who are of Somali nationality. The 4 Factor LEP has been completed and shows that

currently more than two-thirds of the PMHA jurisdiction population speaks English and that no other language meets the 5% or 1,000 person threshold for requiring written translation of vital documents.

Because the agency did open the Housing Choice Voucher waiting list, there will be an increase in persons who are not English speaking who will require assistance in translation services from the agency. For this reason, the agency has developed a Language Assistance Plan. The agency is also reviewing and preparing documents that would benefit the applicants upon intake and throughout the housing process. We have communicated with various agencies in Franklin County for the purpose of conducting diversity training and interpretation services. At this time it is our intention to develop a working partnership with Deaf Services Center in Columbus which is also the entity used by our local Jobs & Family Services office. The Adult Basic Literacy Education Program in Circleville is offering classes for English Speakers of Other Languages twice weekly and this information is posted in our office and we will be including this information in our briefing packet for HCV recipients. The local Joint Vocational School has utilized a program that allows persons to change the language on their website. We will be researching this option for the PMHA website also. As we continue to learn of new programs and ideas that would benefit persons of other cultures in better understanding our agency, we will expand and inform of those options.

As stated, PMHA is currently working with Deaf Services Center in Columbus, Ohio to develop options for interpretation services. A copy of our current LEP and LAP are included as appendix to this section of the Annual Plan. The cost for provision of interpretation services is significant. To assess that we are providing the correct interpretation for the applicant at the point of Intake, PMHA will send the Personal Declaration Form to each applicant and require that it be returned to the PMHA office one week in advance of the appointment if the applicant is seeking any foreign language or hearing impaired interpretation. A Language Identification Flash Card will be sent with the Personal Declaration to assist the applicant in identification of the language spoken, and thus the interpretation need. The applicant will be permitted to bring their own interpreter to the intake appointment and briefing.

We are currently working with Deaf Services Center to also complete a translated version of the Housing Choice Voucher briefing used by the agency. Because the majority of non-speaking English applicants are of Somali nationality, this translated version will be Arabic. Typically, the agency conducts three briefings monthly. One briefing will be conducted using the translated video and the other two briefings will be conducted in English. The applicant can attend any briefing they choose.

As part of the LEP, the agency staff has trained on Fair Housing (annually) with emphasis on diversity training. The agency Executive Director and PMHA Staff met with school and local officials to inform them of the number of Somali applicants processed by the agency. These meetings were conducted so that these agencies could begin to prepare and plan for serving the needs of this population.

Accessibility for Persons With Disabilities

Pickaway MHA coordinates with all local service providers to guarantee support for our disabled population. This includes working with local nursing care facilities upon release of patients who

are program participants, as well as with the Passport Program who assists individuals with modification suggestions of homes in order for them to be more easily accessible. A local organization, Circle of Caring, provides modifications such as ramp construction to ease access at residences. Pickaway County Hands for Disabled assists with loan of accessible apparatus during a period pending receipt of permanent equipment or for those suffering short term disabilities following injury, accident or surgeries.

The Pickaway County Rural Transport Program provides low cost transportation to persons with disabilities, or with other transit issues. The local Veteran Services office also provides medical and employment transport to local Veterans. Pickaway County Jobs & Family Services also cooperates with the Pickaway Senior Center to provide adequate transportation to assist many elderly persons, including those with disabilities.

Pickaway MHA offices are accessible. PMHA staff will also conduct appointments at the residence or a nursing care facility when possible if medically necessary or to provide reasonable accommodation.

PMHA maintains a record of requests for reasonable accommodation. PMHA process for determining reasonable accommodation may require the verification of need by a person authorized or qualified to verify the need. PMHA uses a form for this purpose that was prepared by the attorney who serves as the Fair Housing consultant to the agency. Upon receiving verification of the medial nexus, the agency then determines if the accommodation is reasonable. PMHA works closely with the aforementioned providers and with Development Disabilities to create barrier free and accessible housing for our clients.

ANALYSIS

Statistics from Pickaway MHA supports statistics from the Census Bureau. In our capacity as a housing provider, we receive referrals from fellow services providers in Pickaway County and surrounding areas. We also believe our waiting list data indicates our support and representation of low income households throughout our jurisdictional area and of the contiguous populated areas.

The Pickaway Metropolitan Housing Authority maintains wait lists for Housing Choice Voucher, Public Housing, Williamsport Terrace (Rural Development, USDA), as well as management properties Pickaway Terrace, Eden Place and Louise Terrace.

From the agency waiting lists, for households of all demographics, $14,650 is the extremely low income guideline (30% of area median income) for a one person household. In the largest programs, Housing Choice Voucher and Public Housing, 73% of all applicants have income below this level. These programs overwhelmingly represent applicant households inclusive of children.

Female Heads of Household are estimated to represent 73% of applicants for the Housing Choice Voucher and Public Housing programs.

While eligibility for our management properties focus on an age eligibility criteria of 62 years of age or older, resulting in all applicants of those facilities being either 62 or disabled, PMHA

sought to determine how many elderly or disabled apply for our HCV and Public Housing programs. Of current applicants, 24% are disabled and 15% are elderly.

Based on the waiting list data, it is apparent that our marketing strategy is effective in reaching not only local applicants, but those from other jurisdictions who are least likely to apply. The majority of the applicants who apply from outside the jurisdiction are primarily interested in the voucher program because of the portability feature. Of the approximate 121 participants currently on the program who were out of county applicants, we are beginning the annual certification process at this time (June, 2016). Most of those applicants/participants who are of Somali nationality are indicating their desire to port to Franklin County to rejoin members of their families residing in Franklin.

PMHA Conclusions and Strategy for Housing Needs

The Housing Choice Voucher program is the largest PMHA program. In the past, funding has not supported the awarded number of 635 vouchers to be issued monthly. The program consistently expends 100% of the allocated HAP subsidy each year. In 2014, subsidy expenditure was 100.08%. In 2015, we maintained expenditure levels but only by increasing the number of applicants seen each month. We attribute this to the length of time applicants spent on the waiting list and the fact that we were nearing the end of the waiting list before reopening. The Housing Choice Voucher staff continues to focus on administering a strong program and receives High Performer status on a repeated basis each year.

Housing Choice Voucher participants are able to find rental housing in the rural areas of the county, however a great deal of that rental housing stock is aged. It is possible that a shortage of quality rental housing will develop. In the past two years, new landlords have begun participating in the HCV program and are offering improved rental options to the voucher program. Two of the landlords in particular have invested in learning the program requirements in a way that is beneficial to both program management and the participant. PMHA works diligently with area landlords to advertise rental units that are available. This is done by creating a list of area landlords who commonly rent to persons on the Housing Choice Voucher program, and by maintaining a list of available rentals which is updated weekly. These lists are available as handouts to anyone visiting the PMHA office and are published on our website, with weekly updates. The agency maintains a county-wide listing of rental units through the Rent Reasonableness program to assist with rent comparability and availability. PMHA staff routinely prepares brochures and fliers to be placed throughout the jurisdiction at businesses and locations frequented by the public. These brochures highlight our programs and contact information.

Additional modern rental housing would be beneficial to the low income residents of the County. While local officials do not appear to be open to additional multi-family housing developments in the community, they are aggressively pursuing the elimination of blighted housing. Replacement housing may be an avenue to pursue locally as a way to improve housing stock for low income families in the county.

The Public Housing program is designated as a High Performing Agency. The Public Housing program staff has worked diligently to maintain unit turn-around time, to continue quality use of capital improvement funds to minimize required repairs at unit turn-around time, and reduction of tenant accounts receivables. The agency conducts monthly housing inspections of

the housing units and maintains a quarterly pest control treatment rotation. Agency staff is committed to keeping all residential units at 98% or higher occupancy rate at all times. The agency purchased a bed bug treatment system for use in treating any infested unit under supervision of the agency. This eliminates the wait time associated with scheduling an outside contractor to complete the treatment. PMHA retained The Nelrod Company to conduct a Physical Needs Assessment and Energy Audit on PMHA properties in August, 2012. This assessment is in compliance with HUD's PNA requirements.

B.1(a) Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.

In summary, the Pickaway Metropolitan Housing Authority markets all properties in a manner that affirmatively approaches a broad mix of racial and ethnic backgrounds, as well as the aged and disabled. Both the Public Housing and Housing Choice Voucher programs currently have waiting lists. The Housing Choice Voucher waiting list has been closed since July 31, 2015. To re-open the waiting list, the PMHA Board of Commissioners will resolve to open the list and a notice will be printed in the local daily newspaper. The notice will detail the manner and length of time in which applications will be accepted. Currently only the public housing two bedroom wait list is closed. PMHA has 10 two bedroom units of public housing. With over 40 units of three bedroom housing, when households size reductions occur in the three bedroom inventory, we require the household to relocate to a two bedroom unit. This transfer policy often fills two bedroom vacancies. Occasionally we will also need to transfer a one bedroom family to a two bedroom unit. Because the two bedroom waiting list is closed, eligible two bedroom families have been placed on the one bedroom waiting list upon request.

The Housing Authority is currently in discussion with HUD representatives concerning the sale of a property owned by the agency. Once this vacant lot is sold, the Housing Authority will use the proceeds to acquire additional properties that will be, depending on the approval given by the HUD Field Office, either added to the public housing program due to availability on the Faircloth Limit, or made available for rental through the Voucher Program. It would be the agency intent to purchase homes that will serve one to two bedroom households as there seems to be the greatest need for this family size. It would further be the intent to add these homes in locations where current subsidized housing is not prevalent to provide decentralized housing opportunities for our program participants. (Note: Subsequent to original writing of the 2017 Plan, guidance has been received from HUD and the Board is currently writing a plan to meet that guidance that will be submitted for approval prior to implementation).

The Admissions & Continuing Occupancy Policy and the Administrative Plan include policy on taking applications for housing and on establishing and maintaining the waiting list. Applications can be submitted to PMHA in person, by mail, or by fax. PMHA does reserve the right to close the waiting list when application wait time exceeds one year. Public Housing waiting lists would be closed by bedroom size with public notification required.

At the time of application, PMHA requires proof of all household income, copies of birth certificates and verification of social security numbers of all persons listed on the application. Proof of preference information is also requested, but not required until the Intake appointment. Applications are only withheld from the waiting list if income documentation is not available. Applicants are allowed a thirty day period to provide those documents not

available at the time the application is submitted. However, all documentation must be available at the time of Intake.

The ACOP and Admin Plan also discuss the procedure for Intake as it pertains to appointments, rescheduling of appointments and the need to update information on the application while the family is on the waiting list. Pickaway MHA maintains community wide wait lists and does not have any site-based waiting lists other than for the Multi-Family and Rural Development properties managed by the Agency.

PMHA requires applicants to be eligible for admission by qualifying as a family, qualifying by meeting income requirements, qualifying by eligible citizenship or immigrant status criteria, qualifying by documentation of social security information and qualification by processing all necessary consenting and authorizing documents necessary to provide eligibility as well as tenant rental obligations. The public housing program residents are also screened for suitability through a background screening process. PMHA Policies establish criteria for meeting family status, income eligibility, citizenship and/or eligible immigration status, as well as the screening process applied to each applicant household.

The criteria for processing applications for admission, the interview and verification process are also included in the Agency Policies. Applicants are notified that they are scheduled for Intake and also given the opportunity to reschedule if the time and date established is not convenient.

Preferences of PMHA programs are given to victims of a natural disaster that result in long term loss of housing and is certified by a declaration of disaster by the Executive Branch of the United States of America or by state government, and are given for applicants documenting Veteran Status. Veteran status will be awarded to those offering proof as a veteran eligible to receive benefits of the US armed forces or the spouse of a veteran.

Applications are organized as a permanent file and for Public Housing are maintained in order of bedroom size, preference and date and time of application. PMHA schedules Intake appointments and briefings monthly if anticipation of vacancies exists. Once the agency is aware of a new vacancy, approved applicants are notified of the opportunity to lease housing on a specific date. All effort will be given to house applicants in chronological order of application date, but the unit will ultimately be leased to the first household that can take possession of the available dwelling. The ACOP addresses established occupancy criteria, with residents given the opportunity to be placed on a range of bedroom size units, if the waiting lists are open.

The Housing Choice Voucher program application policies are consistent with those of the Public Housing program, with these policies addressed in the agency Administrative Plan. In addition to the preferences discussed above, the Housing Choice Voucher program grants a preference for victims of domestic violence. Criteria for meeting this preference are established in the Plan and were developed with assistance from the Director of the local women's shelter. This preference has been reviewed by representatives from Southeastern Ohio Legal Aid. This preference does limit voucher allocation for Domestic Violence Victims to eight per year. PMHA also allocates twenty-two Family Unification Vouchers annually to be issued under recommendation by Jobs and Family Services to families who face removal of children from the home because of nonexistent or less than satisfactory housing situation, including domestic

violence related issues and for youth aging out of Foster Care. Pickaway MHA and Pickaway County JFS have submitted a joint application under PIH Notice 2016-01 to apply for the Family Self Sufficiency and Family Unification Demonstration Program. Referral for these vouchers for waiting list placement will be accepted from the specific agencies involved while the waiting list is closed. In an effort to be aware of issues facing the potential recipients of these vouchers, and in order to have a voice in facilitating programs to benefit the victims of Domestic Violence and homeless families, a PMHA Housing Choice Voucher staff member serves on the Domestic Violence Task Force and the PMHA Executive Director is a member of the Jobs & Family Planning Committee. (Note: Subsequent to the original writing of the Plan, PMHA was notified that they have been approved for the FUP/FSS Grant. PMHA, in cooperation with receipt of this Grant, is also participating in a Region 16 Youth Homelessness Initiative sponsored by COOHIO and PMHA has been asked to provide an appointment to the Children and Family First Council).

In summary, the Pickaway Metropolitan Housing authority has several management tools in place to appropriately administer the programs offered through the agency, including the Public Housing Occupancy Policy, and the Housing Choice Voucher Administrative Plan.

Pickaway MHA inspects all Public Housing units on a regular basis. Quarterly pest control treatments are completed in each unit under a contract with Ohio Pest Control. Tenants with health related issues are permitted to submit documentation exempting them from this treatment. Tenants who experience pest issues in spite of the treatment are few, but when this does occur, PMHA will provide one extensive clean-out treatment. Other than infestation associated with bed bugs, PMHA experiences no pest related issues as a result of this quarterly treatment.

Eradication of bed bugs is most successful when treated with heat. As previously stated, in order to control costs, PMHA purchased their own bed bug heat treatment system with funds earned from a developer fee associated with renovation of a RD property. Because PMHA manages properties in addition to the public housing program, use of the system is charged to the specific property where the equipment is used, based on a set rate established by bedroom size plus the cost of propane. Previously adopted, the PMHA Bed Bug Policy allows for treatment without charge to the household. If subsequent infestations occur, PMHA will continue to treat the residential unit for eradication, but multiple infestations will result in the decision to non-renew or terminate the resident lease. Tenants always have the right to appeal any termination action. The most important step in keeping PMHA properties bedbug free is the education of residents to guarantee that the infestation does not occur. PMHA takes a proactive effort to educate potential and current residents about the prevalence and effort to eradicate bed bugs in local rental housing. PMHA has also implemented the use of a bed bug sniffing dog as a preventative measure to keep bed bug presence in the originating residence.

Policy Changes Since the 2016 Annual Plan Submission

The Pickaway Metropolitan Housing Authority Board of Commissioners have approved the following Policy Changes for Program Management for implementation in 2016:

- Public Housing Utility Allowances were reviewed and revised for implementation effective January 1, 2016. 2017 Utility Allowance and Flat Rent revisions are currently under review by the staff for presentation to the Board.

- The Board agreed to administer the CHIP grant for the City of Circleville, providing utility and deposit assistance to Voucher Recipients who document need in order to obtain housing
- The Board reviewed the Fair Market Rents for comparison to the Payment Standards of the Agency and determined that current Payment Standards are compliant by falling between the 90% and 110% of the Fair Market Rents for the jurisdiction. (Note: Subsequent to the original writing of the Plan, 2017 FMR were released and PMHA Payment Standards will not be revised as all rents fall between 90% and 100% of the FMR).
- The Board reviewed Flat Rents and approved Flat Rents that meet the Intent of HUD Notice 2015-13.
- The Board authorized the use of a bed bug sniffing dog in properties managed by the agency. The dog will be used in the Public Housing units at Rustic Ridge on a quarterly basis and in the apartments and single family dwellings as appropriate. Residents will be given proper notice before each visit. The purpose is to identify any potential infestation before it spreads, particularly in units with common walls to another unit.
- The Board approved the staff to conduct a Client Satisfaction Survey over a 2 month period for participants of the voucher and public housing programs.
- The Board approved projects to be included in the 501-16 Capital Fund Grant
- The Board approved changes to the Administrative Plan that included:
    - ✓ Voucher Suspension – Suspension of the term of the voucher from the time a Request of Tenancy is turned in until the family has been notified of approval of the request. This information was included in the briefing packet for participants.
    - ✓ Portability Billing – the receiving PHA must send billing of any portability to the initial PHA within 90 days. The term of the receiving PHA's voucher may not expire 30 days from the expiration date of the initial PHA's voucher.
    - ✓ $50 Minimum Rent – the Board reinstated the implementation of the $50 Minimum Rent in accordance with HUD Regulations, effective January 1, 2017. Minimum Rents will be implemented for all move-ins on January 1, 2017 and thereafter, or at the time of any Interim Change or Annual Certification.
    - ✓ Language was revised regarding the Earned Income Disallowance that states all EID Participants qualifying after 5/9/16 will have 24 consecutive months to use the Earned Income Disallowance versus the 48 months previously given. (Revised in Admissions and Continuing Occupancy also)
    - ✓ Concerning assets, PMHA will accept self-declaration of assets totaling less than $5,000 and anticipated asset income when applicable. PMHA will verify by third party every three years thereafter. (Revised in Admissions and Continuing Occupancy also)
    - ✓ Concerning Social Security Numbers, if an applicant family includes a child under 6 years of age who joined the household within the six months prior to the date of voucher issuance, we will allow lease up with the condition they provide verification within 90 days from when the contract is signed. We will also permit a 90 day extension due to unforeseen circumstances (Revised in Admissions and Continuing Occupancy also).
    - ✓ The Income Determination process for family members with fixed sources of income will include applying a verified cost of living adjustment (COLA) or rate of

interest. Third party verification is still required at New Admission and every three years (Revised in Admissions and Continuing Occupancy also)

- ✓ An applicant can maintain their place on the waiting list but cannot become a participant until the applicant can provide the documentation to verify the SSN of each member of the household (Revised in Admissions and Continuing Occupancy also)
- ✓ The definition of Extremely Low Income used for Income Targeting has been revised per HUD's guidelines (Revised in Admissions and Continuing Occupancy also)
- ✓ Revisions were approved to the calculation of income used under the student rule. This language was revised to include "fees" to amounts received for tuition to be counted as income, with the exception of the financial assistance received by persons over the age of 23 with dependent children.

- For the Public Housing Program, the Board approved these additional changes to the Admissions and Continuing Occupancy Plan:
  - ✓ The calculation for public housing pro-ration of assistance for mixed-families is now based on the Flat rent for the Unit and is calculated using the HUD provided formula for Pro-Rated Assistance
  - ✓ Language was inserted to clarify that Flat rent changes go into effect in January. For current residents, any change goes into effect upon the next annual recertification. For move-ins, the changes go into effect upon move-in.
  - ✓ Community Service changes related to Self-Certification of hours worked and PMHA's requirements on sampling of the self-certifications for verification has been added to the Community Service program. All other requirements of the Streamlining regulations were already in place in our CS program.
  - ✓ Language was added that HUD will pay an Operating Subsidy for a limited number of vacant units under the ACC with the limited number of vacant units equal to or less than 3 percent of the unit months. Additional language related to Central Cost Centers and Asset Management are not relevant to PMHA because we have only one AMP.
- The Board approved David Pontious to serve as the Agency 504 Coordinator and ADA/EEO Compliance Officer due to the retirement of Rebecca Curtis from the staff.
- The Board approved multiple revisions to the Personnel Policy Manual with all changes applicable to the agency staff only
- The Board approved an Assistance Animal Addendum to the lease of residents who request an Assistance Animal as a Reasonable Accommodation. This addendum provides the guidance and requirements for the care and maintenance of assistance animals as opposed to the agency pet policy.
- The Board approved changes to the Administrative Plan and the Admissions and Occupancy Policy concerning language related to the denial of assistance based on arrest records. The agency policies were already compliant with HUD Notice 2015-19 in this area but were updated so that the exact language of the Notice was used in the policies.
- The Board authorized application for five (5) additional VASH Vouchers, bringing the agency total to 26 Vouchers. This application was approved.

- The Hearing Officers for the Grievance Policy were updated. The Board has agreed to serve as the Hearing Officers for any Grievance. This was effective immediately and to continue until further action is taken. A log of all Hearings will be maintained and available for public view and Grievance language will be added to all leases and briefing packets.
- The Board has adopted a Smoke Free Housing Policy that will be implemented January 1, 2017. This policy has been reviewed and approved by Attorney William Willis.
- The Board has adopted the LEP and the LAP, also following review and approval by Mr. Willis.
- The Board applied for and was awarded the Family Unification Program/Family Self Sufficiency Demonstration Grant in cooperation with the local Jobs & Family Service office. This grant will assist youth coming out of Foster Care with obtaining skills and education to become self-sufficient. Grantees are given a voucher and guidance for up to five years to achieve their established goal.

B.1(a) Financial Resources

The Pickaway Metropolitan Housing Authority lists the following as sources of income:

Federal and Federal Related Income	Non-Federal
Public Housing Operating Subsidy	Management Fees*
Capital Fund	OBA Rent Income**
Public Housing Rental Income	OBA Interest Income***
HCV Administrative Fees	
HCV HAP Subsidy	
VASH Voucher Administrative Fees	
VASH Voucher Subsidy (HAP)	
FSS Grant	
Interest Income	

PMHA also receives administrative income from grant management when active grants are open. The City of Circleville is currently administering the Community Development Block Grant and have asked the Pickaway MHA to administer the CHIP component of that grant.

*Management fees originate from PMHA management of Pickaway Terrace, Eden Place and Louise Terrace

**OBA Rent Income originates from Other Business Activity Rent Income which are 4 properties owned by the Agency and rented without subsidy. These funds are used to support agency operations such as maintenance of those properties and bed bug equipment, and support of the Development Manager's salary and benefits.

***OBA Interest Income originates from Other Business Activity Checking Account

B.1(a) Rent Determination

As previously stated, Utility Allowances were adopted for both the Public Housing and HCV programs, based on consumption information and rate information for the previous year as provided by the appropriate utility company, and the PMHA Board approved the adoption of Voucher Payment Standards for the HCV program and Flat Rents for the Public Housing program.

In summary, Public Housing residents pay rents based on either the calculated method of 30% of adjusted monthly income, 10% of monthly income, or flat rent. Utility Allowance Payments, when owed, are issued directly to the utility company in the Public Housing Program and to the tenant in the Housing Choice Voucher program.

The HCV Administrative Plan addresses rent and HAP assistance to recipients of this program. The Administrative Plan establishes the Housing Authority will not approve an initial rent or a rent increase in any of the tenant-based programs without determining the rent amount is reasonable. Reasonableness is determined for the HCV recipient prior to the initial lease and before any increase in rent to an owner is approved, when changes in the published FMR requires review, or if the Housing Authority or HUD directs that reasonableness be re-determined. Rent reasonableness is established by comparing the rent of the unit to the rent of comparable units in the same or comparable neighborhoods. The Nelrod Company will compile Rent Reasonableness data for Pickaway MHA.

The Administrative Plan establishes maximum subsidy calculations for the voucher program, for voucher tenancy in other federal housing programs, and for manufactured homes. The Plan also establishes the method for setting Payment Standards, and for selecting the correct payment standard for a family.

Types of assistance and rent formulas under the HCV program as outlined in the Administrative Plan include final calculations based on the Total Tenant Payment of either 10% of monthly income, 30% of adjusted monthly income, Section 8 Merged Vouchers, Section 8 Preservation Voucher, and Manufactured Home Space Rental under the Section 8 Voucher program. PMHA pays the owner the lesser of the HAP amount or the rent, with payments mailed on the first working day of the month. (See prior comments)

B.1(a) Homeownership Programs

There are currently no active homeownership programs underway. PMHA retains ownership of a property that was assigned to the former 5h homeownership program. An Agreement with the OIG regarding the disposition of that property required that the property be sold. Attempts have been made to sell the property in the past without success. At this time, real estate opportunities and interest are increasing in the area and PMHA has requested HUD Field Office Permission to again attempt to sell the property. (see prior comments)

Pickaway MHA is currently implementing a development program. Current plans include the application of LIHTC funds for renovation of one Rural Development 515 property. Other options under research include possible acquisition of 1 and 2 bedroom properties. One and two bedroom properties have been identified as those most difficult to find in our jurisdiction. Further research will be completed to determine if PMHA can add units to the existing Public Housing Program or supply affordable rental options to low income residents through other options. The PMHA Faircloth Limit is 115 but currently only 108 units exist in the Public Housing portfolio due to the previous administration of a 5h Homeownership Program by the agency.

B.1(a) Safety and Crime Prevention

In summary, safety and crime prevention are extremely important to PMHA. The agency works hand-in-hand with local law enforcement on these issues and is often the initial reporting source when drug use becomes present in a public housing unit. PMHA permitted undercover investigation to be conducted from an agency owned unit (not a public housing unit) in 2014. Pickaway County and the City of Circleville are plagued with drug activity, specifically an increase in heroin sell and use. As a result of this activity, HIV and Hepatitis C are also trending upward for this area according to the local Health Department. The Housing Authority has been included in the creation of the local Community Health Improvement Program and is utilizing the information provided through this program to educate staff on preventative measures to avoid contact with these diseases. PMHA staff members participate in local drug and crime prevention task force groups to work toward the elimination of this drug activity.

PMHA public housing policies permit staff access to each housing unit on a monthly basis. Access is available through housekeeping inspections, pest control rotation, or furnace and air conditioning filter change and cleaning. This access allows PMHA staff to recognize the potential for safety and/or crime situations as they develop. Pickaway MHA has implemented lease termination procedures on residents in the past year for drug use or suspected trafficking but tenants will almost always vacate the property before the hearing is scheduled to avoid an eviction on their record and to avoid the agency's presentation of evidence in a court room.

Pickaway County and City of Circleville law enforcement agencies are active participants in the Ohio US Route 23 pipeline program managed in cooperation with the Ohio Attorney General office. As a result, drug busts and arrests are not uncommon in Pickaway County because US Route 23 is a main thoroughfare from Portsmouth, Ohio and Columbus and the highway bi-sects Pickaway County. Law enforcement staged several large scale arrests in 2014 and 2015. One bust alone netted over 50 arrests for trafficking heroin. The daughter of one public housing resident was arrested while visiting her mother but there was no indication that she was anything other than a guest at that time. The most recent major drug bust occurred in August, 2016. Over 30 persons were arrested and charged with heroin trafficking. There were no public housing or HCV participants arrested in this operation.

PMHA has purchased and installed fire suppression canisters on the underside of each public housing range hood in an effort to immediately douse fires that may originate on the stove top. Smoke detectors were also upgraded in 2013.

Pickaway MHA will implement Smoke Free Housing in all public housing, agency grounds and common areas, and in all management properties in 2017. The residents have been notified that this will occur and a Smoke Free Policy is included with this plan. Residents will be asked to sign the Lease Addendum on Smoke Free Housing and incoming applicants will also be asked to sign the Addendum in 2017. Throughout 2017, residents will be issued reminder warnings regarding smoking when a violation is noted. Beginning in 2018, a five step process for termination of tenancy will be implemented. The five step process is:

- First violation, verbal warning
- Second violation, written warning
- Third violation, written warning with mandatory requirement to seek cessation assistance

- Fourth violation, notice of termination of tenancy with six week hold if tenant requests permission to seek additional cessation assistance
- Fifth violation, notice of termination with only grievance hearing options

This policy is being developed with the assistance of the local Health Department and is implemented to enhance safety in the units, to encourage improved health conditions for residents and neighbors and to decrease the amount of cost associated with unit turnaround during vacancy.

Due to theft and vandalism of public restrooms in the one bedroom apartment building adjoining the PMHA office, security cameras have been installed. The camera installation is limited to hallways and community areas. No offices or private residences or public restrooms have surveillance. Additionally, security cameras have been installed around the perimeter of the PMHA office and the one bedroom apartment building.

PMHA staff serve on the Domestic Violence Task Force and PMHA residents are briefed annually on their rights under VAWA.

B.1(a) Pet Revisions

There have been no revisions to the Pet Policy since the approved 2016 Annual Plan.

PMHA continues to support and implement Fair Housing regulations and requirements concerning assistance and service animals in public and managed housing. As previously discussed, the agency Board did adopt an Assistance Animal Addendum to the lease which covers the care and maintenance of Assistance Animals. This Addendum was prepared by an attorney who specializes in Fair Housing compliance. In summary, PMHA does require that all pets be maintained by their owners in a manner that promotes safety and a positive neighborhood environment.

B.1(a) Substantial Deviation

There have been no changes to the agency's Substantial Deviation or Significant Amendment/Modification policy. If PMHA is contemplating the addition of a major policy creation, deviation or amendment, the goal is to include that change in the Agency Annual Plan submission. In this manner, a policy can be given the appropriate consideration throughout the writing, hearing and public comment periods associated with the Plan.

If this is not possible, the definitions of Significant Amendment and Substantial Deviation/Modification are as follows:

In considering any significant amendment or modification to the Annual Plan or the Five Year Plan, the PMHA Board and Executive Director will seek the input and recommendations of the Resident Advisory Board, conduct a public hearing, adopt the amendment/ modification at a regularly scheduled meeting of the Board of Commissioners of the Agency, and submit the amendment/modification to HUD for approval.

Pickaway MHA currently uses a three level strategy to make changes in operating policies that would not be considered a Significant Amendment or Substantial Deviation/Modification to the Five Year Plan or Annual Plan. The staff initially meets to discuss the need for the change in

policy. Statistics or data surrounding the change are reviewed and discussed in depth, and a recommendation is made and considered by the Program Coordinator, the Maintenance Supervisor, if relevant, the Finance Director and the Executive Director. If it is determined that the change to the current operating policy is necessary, that policy change is presented to the Board of Commissioners for review. The Board takes formal action on approval of the change at a regularly scheduled meeting of the Board. Tenants, landlords, or in any scenario, the affected party receives a 60 day notice of the change, prior to the implementation.

A Significant Amendment or Substantial Deviation requiring modification to the Annual Plan or Five Year Plan includes consultation with the Resident Advisory Board, a public hearing, and approval by the PMHA Board and submission to HUD. A Significant Amendment or Substantial Deviation would include changes to rent or admissions policies or organization of the waiting list outside of the normal course of doing business, such as the addition of a preference, a change in the use of replacement reserve funds under the Capital Fund, and any Change to PMHA programs in regard to demolition or disposition, designation, homeownership programs or conversion activities.

B.1(b) Deconcentration Policy

The Deconcentration of Poverty and Income Mixing appears in Chapter 4 of the Admissions and Continuing Occupancy Policy. The ACOP states:

The PHA's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of the PHA's deconcentration policies must be included in its annual plan [24 CFR 903.7(b)].

The PHA's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(c)(1)].

Steps for Implementation [24 CFR 903.2 (c)(1)]

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, the PHA must comply with the following steps:

Step 1. The PHA must determine the average income of all families residing in all the PHA's covered developments. The PHA may use the median income, instead of average income, provided that the PHA includes a written explanation in its annual plan justifying the use of median income.

The Pickaway MHA Policy is that the PHA will determine the average income of all families in all covered developments on an annual basis.

Step 2. The PHA must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, the PHA has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

The Pickaway MHA will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

Step 3. The PHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which family would be defined as an extremely low income family (30% of median income).

Step 4. The PHA with covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.

Step 5. Where the income profile for a covered development is not explained or justified in the annual plan submission, the PHA must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances, the PHA's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration
- Providing other strategies permitted by statute and determined by the PHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and PHA strategic objectives.

A family has the sole discretion whether to accept an offer of a unit made under the PHA's deconcentration policy. The PHA must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the PHA's deconcentration policy (24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, the PHA will be considered to be in compliance with the deconcentration requirement and no further action is required.

For developments outside the EIR the Pickaway MHA will take the following actions to provide for deconcentration of poverty and income mixing: PMHA may, in order to achieve a broad range of income in public housing projects, skip a family on the waiting list to reach another family in an effort to further the goals of deconcentration.

In Chapter 12, regarding transfers of public housing residents, the PMHA policy states, "if subject to deconcentration requirements, the PHA will consider its deconcentration goals when transfer units are offered. When feasible, families about the EIR will be offered a unit in a development that is below the EIR, and vice versa, to achieve the PHA's deconcentration goals. A deconcentration offer will be considered a "bonus" offer; that is, if a resident refuses a deconcentration offer, the resident will receive one additional transfer offer.

The 2015 Annual Assessment determined the agency to be in compliance with deconcentration. The 2016 Assessment will be completed in October, 2016

B.2(b): Description of Development and Disposition Activities Planned

As stated earlier, PMHA has land that was assigned to the dormant 5h program as the result of an OIG Agreement. Attempts were made in the past to sell the land but this encompassed the period of time where industry cutbacks and economic issues facing not only our location but the entire nation made the housing industry stagnant and there was no interest in purchase of the land. It is our intent in 2016/2017 to sell the property under the Cleveland Field Office's Guidance and use the proceeds from the sale to either add to our public housing stock or to purchase properties that could be rentals of voucher holders. Initial conversations with the Field Office are focusing on the sale of the property, with a decision on proceeding with the sale proceeds to be decided. It has been indicated that this sale may need to involve Disposition; thus the reason for these comments. The Agency Faircloth Limit is 115, with 108 Public Housing residences available to the public. (see previous discussion)

PMHA is currently researching the opportunities offered under the Rental Assistance Demonstration Program. Initial meetings have been conducted and trainings attended. No final decision has been made.

B.3 Progress Report – Meeting Missions and Goals

PMHA is committed to meeting the agency mission through retaining and expanding housing opportunities in Pickaway County. Related to this goal, PMHA was recently given the opportunity to apply for five additional VASH vouchers, bringing the agency total to twenty-six.

The Pickaway Metropolitan Housing Authority continues to strengthen the programs of the agency by promoting the agency's mission. Our Family Self Sufficiency Program, the administration of the CHIP grant on behalf of the City of Circleville, and the housing programs administered by the agency continue to stabilize the lives of the participants enrolled by firm application of program expectations.

PMHA staff members serve on the Boards of the local Community Action Agency, Senior Center, Jobs & Family Planning Committee, Continuum of Care, Domestic Violence Task Force, and County Safety Committee. The agency works closely with Jobs & Family Services, Haven House and the Adult Shelters, the local Veterans organizations, Southeastern Ohio Legal Aid and our local elected officials to meet the needs of our citizens and the community in general. We work hand-in-hand with local law enforcement agencies to eliminate drug use and sales in our neighborhoods and by our program participants. Pickaway County is experiencing a continuing heroin problem in addition to the use of manufactured methamphetamine products. The agency is often first to report a suspected problem in our housing. PMHA has been asked to participate in a local initiative to eliminate local drug issues. Our Public Housing Manager serves as the agency representative to this coalition.

PMHA trains agency staff on Fair Housing issues annually. Our trainer is a Columbus, Ohio attorney who specializes in Fair Housing law and who trains throughout the state and region. The staff is also trained by representatives of the Southeastern Ohio Legal Aid office and help sponsor publication and dissemination of public trainings conducted on Fair Housing Law by this office. PMHA is proud of the working relationship established with SEOLA and has reached out directly to that office to request intervention and representation on issues with program participants when it is felt a resident or participant may need better guidance and information than they receive from acquaintances. SEOLA always responds in a positive manner and works with PMHA toward resolution of any housing issues that arise. Additionally, the agency subscribes to Fair Housing publications which each staff member is required to read and initial bi-monthly.

As part of the review of policies, the VAWA language for all programs is reviewed annually. The VAWA Policy was revised in 2015 to include sexual assault language and to implement and include all aspects of PIH Notices related to VAWA. The ACOP and Admin Policies were also reviewed for this information. Additionally, PMHA now uses the Pamphlet, "Know Your Rights: Domestic Violence and Federally Assisted Housing" as provided by Action Ohio to all Public Housing and Housing Choice Voucher program participants. As previously stated, PMHA provides a preference for program participation through issuance of 8 Domestic Violence vouchers per year to Domestic Violence victims as identified as meeting established criteria by the Director of the local Domestic Violence Shelter.

As a designated Small Housing Authority, we continue to use our Capital Fund dollars toward improvements in our housing stock. PMHA has completed phase 3 of HVAC replacement in designated public housing units, resulting in energy efficient units in our public housing stock.

Many housing recipients are stymied in their efforts to find suitable rentals due to the security deposit and utility deposits associated with relocation. PMHA has established a financial allocation to assist with these moving costs and deposits associated with lease signing or relocation. The recipients enter into a repayment agreement with the agency, making monthly payments that are redeposited into the fund thereby replenishing it for future recipients.

PMHA has made public housing unit turn around a priority in recent years and has increased the quality of work in the refurbished units. In continuing this effort, but also with a conscious eye on efficient use of available funds, PMHA will implement a smoking ban in public housing, multi-

family and rural development units in 2017. Currently PMHA is turning around units in a manner that guarantees a 98-100% occupancy rate, thereby guaranteeing that our public housing is being utilized by those who qualify for the assistance.

Energy conservation and efficiency will be a priority in all Public Housing renovations when possible. PMHA continues to use Capital Funds to improve the quality of public housing units, including replacing HVAC units with energy efficient products and strategies. Safety is also a major concern in PMHA units.

Continued pursuit of the goals outlined in the Five Year and Annual Plan is a firm commitment of PMHA.

B.4 2015 Fiscal Year Audit

There were no findings or recommendations in the most recently completed audit.

D.1 Capital Improvements Program

See HUD Form 50075.2 approved by HUD on June 30, 2016

Projects included in the plan are:

- Replacement of rear garage doors
- Replacement of patio doors
- Replacement of dryer vents
- Replacement of windows
- Replacement of countertops
- Replacement of roofs, gutters and downspouts
- Replacement of metal frame doors
- Replacement of flooring
- Replacement of aluminum exterior siding
- Replacement of roof flashing
- Replacement of light switches and electrical receptacles
- Replacement of GFI's
- Replacement of Dead bolt locks, door hardware, key entry locks, key entry systems
- Replacement of carpet and flooring]
- Completion of drywall repairs and interior painting for residency over five years
- Upgrade agency security system
- Copier replacement
- Computer and software upgrades
- Replacement of trash waste wheelers
- Replacement of maintenance vehicle
- Replacement of ranges and refrigerators

Not all improvements would be completed at all locations.

Projects Completed 501-14 and 501-15

Phases 2 and 3 of HVAC Replacements. Completion of this project results in energy efficient units replaced in all residences within a 2.5 year span and allows for all units to be the same allowing for greater response and preventative on behalf of the maintenance staff.

Projects Currently under way in CF501-15 and 501-16

Phase I and Phase II of the Rustic Ridge Apartment Building and PMHA Office Roof.

PICKAWAY METROPOLITAN HOUSING AUTHORITY
LANGUAGE ASSESSMENT
FOUR – FACTOR ANALYSIS
June, 2016

In order to determine the estimated needs of Limited English Proficient (LEP) persons in the jurisdiction of the Pickaway Metropolitan Housing Authority (PMHA), the PMHA conducted the following analysis:

Factor 1: Number or proportion of LEP persons served or encountered in the eligible service area

The PMHA researched data from the U.S. Census Bureau's American Factfinder website in order to gather data about the overall population of PMHA's jurisdiction. This information includes the language spoken within that jurisdiction. The data indicated the following:

Total population of the jurisdiction 5 years and over	53.149
Total LEP population of the jurisdiction 5 years and over	735 (1.6%)
Spanish speaking LEP population of the jurisdiction 5 years and over	0.6%
Asian and Pacific Islander language speaking population of the jurisdiction 5 years and over	0.2%
Other Indo-European language speaking population of the jurisdiction 5 years and over	0.5%
Other language speaking LEP population of the jurisdiction 5 years and over	0.0.%

The above data demonstrates that more than two-thirds of the jurisdiction's population is English speaking and that no other language meets the 5% or 1,000 person threshold for requiring written translation of vital documents.

PMHA also completed an informal, in-office and public agency survey to determine how many LEP persons visited or called the office in the 90 day period preceding the survey, and what the primary language of these individuals was. During the open waiting list period for the Housing Choice Voucher program in July, 2015, a significant number of Somali residents currently residing in Franklin County, Ohio requested applications from PMHA. Other than during this period, no persons of LEP visited the office.

Immediately following the open wait list period, the PMHA Director met with the Directors of Pickaway JFS, Pickaway Community Action Agency and Southeastern Ohio Legal Aid, the Superintendents and Administrators of the Education Service Center and 4 County School Districts, the Pickaway County Commissioners and the Mayor of Circleville. No other agency or office has reported contact with Somalia persons or person of Limited English Proficiency at that

time. As the applicants were processed from the PMHA waiting list, the Circleville Schools, JFS, PICCA, and the Health Department have provided services to the housing recipients.

Factor 2: Frequency of contact with the program

Presently, contact with persons who speak with limited English proficiency is infrequent however PMHA acknowledges that as additional applicants are processed from the waiting list, this contact will increase.

Contact with LEP persons who speak other languages are also infrequent. When the Somali applicants are given the opportunity to identify their language, they have responded "Somali". Upon research, the language "Somali" has three dialects, none of which are listed as an official language. Research also states that individuals of this population are teaching their children the written language Arabic, and ODS has identified Arabic as the language used most frequently by these individuals.

Factor 3: Importance of service, information, program or activity

Services provided by PMHA are important as they relate to a client's need for, or continued provision of, affordable housing.

Factor 4: Costs versus resources and benefits

The Pickaway MHA will utilize any documents provided by HUD in languages other than English.

The PMHA will retain the services of a professional interpretation service to provide oral interpretation as needed. PMHA will also translate the HCV Briefing into Arabic if possible.

PICKAWAY METROPOLITAN HOUSING AUTHORITY
LANGUAGE ASSISTANCE PLAN

I. Introduction

The Pickaway Metropolitan Housing Authority (PMHA) is committed to providing equal opportunity housing in a non-discriminatory manner, to comply with all Federal, State and local nondiscrimination laws and to comply with the rules and regulations governing Fair Housing and Equal Opportunity in housing and employment. This includes complying with title VI of the Civil Rights Acts of 1964 to ensure meaningful access to programs and activities by Limited English Proficiency (LEP) persons.

The purpose of this Language Assistance Plan (LAP) is to identify how PMHA will ensure the agency methods of administration will not have the effect of subjecting LEP persons to discrimination because of their national origin, and to ensure LEP persons have full access PMHA programs and services.

The guidance provided within this plan will extend to properties under the jurisdiction of Pickaway MHA, including those properties where the agency serves as the Managing Agent.

II. Who is LEP?

For purposes of this LAP, anyone whose primary language is not English and has a limited ability to read, write, speak or understand English, may be LEP.

The PMHA will not identify anyone as LEP; the beneficiaries of the services and activities must identify themselves as LEP (Federal Register Vol. 72, No. 13, January 22, 2007).

III. Identification of Language Needs Within the Jurisdiction

Through review of the U.S. Census Bureau's American Fact Finder for Pickaway County, it has been determined that English is the language spoken by the vast majority of residents in the jurisdiction, and there are no languages that meet the 4 Factor Analysis Criteria. The 4 Factor Analysis Criteria is:
(1) Number or proportion of LEP persons served or encountered in the eligible service area
(2) Frequency of contact with the program
(3) Importance of service, information, program or activity
(4) Costs versus resource and benefits requiring translation of vital documents.

American Fact Finder identified that there are 53,149 residents over the age of 5 within the jurisdiction that speak English as their primary language, representing 98.6% of the population. Guidance provided by HUD states that written translations of vital documents should be provided for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be effected or encountered. PMHA has determined that because there are no populations of LEP

persons other than English speaking persons in their jurisdiction, there is no mandate to translate vital documents into any other language.

PMHA recently opened their Housing Choice Voucher waiting list. During the one month period that the list was open to applicants, several Somali residents of Franklin County requested applications. The Housing Authority has processed approximately ten of these applicants onto the Voucher Program and one onto the Public Housing Program. It is anticipated that additional applications from these applicants will be processed from the waiting lists beginning in 2017. For this reason, PMHA is providing this LAP for guidance as more applicants process onto the program.

It is also noted that while approximately ten applicants of Somali descent have participated in the voucher program, those ten are nearing their annual certification renewal. Most have indicated their intention to port to Franklin County upon completion of their initial first 12 months in Pickaway County. Therefore new applicants coming onto the program are not anticipated to significantly increase the percentage of Arabic speaking persons on the program or within the Pickaway County population.

IV. Written Translation

Review of the LAP will be evaluated annually to determine if other LEP are present in the area, however the current LAP indicates that Somali households are those we should anticipate requiring translation assistance.

PMHA will use the Language Identification Flashcard (LIF) as the first step in determining need for translation assistance. The LIF will be part of the PMHA application. All applicants will be asked to identify the language they speak. The applicants will also be asked

- if they require interpretation assistance,
- do they prefer to provide their own interpretation assistance, or would they prefer PMHA make arrangements for interpretation.

For those already on the waiting list, PMHA will send the LIF via mail with the intake appointment letter. The applicant will be provided a postage paid envelope and asked to return the LIF immediately so that PMHA will know whether interpretation services are needed.

Vital Documents

HUD has defined "vital documents" to be those documents that are critical for ensuring meaningful access or awareness of rights or services, by beneficiaries or potential beneficiaries generally and LEP persons specifically.

Any relevant translated documents available from the Limited English Proficiency Resource Library at hud.gov will be made available to LEP applicant and participants who indicate they speak a language other than English. The applicants will be asked to sign the English version of all forms but will be welcome to also maintain a copy of the appropriate language version:

V. Oral Interpretation

PMHA will make every effort to provide oral interpretation for all clients who have identified themselves as LEP and who request services. PMHA has read and acknowledges that it is not desirable to have individuals provide their own interpreter however the significant cost related to this service requires that the agency provide interpretation services only when requested by the applicant/resident.

PMHA is currently engaged in planning with Ohio Deaf Services in Columbus, Ohio. As identified, the majority of our non-English speaking applicants are Somali. ODS has indicated through their staff, that language spoken by Somali is most commonly Arabic. For this reason, PMHA will have the portion of the briefing that is videotaped translated into Arabic. PMHA commonly hosts three briefings in any month in which applicants are called from the waiting list. PMHA will make all applicants aware that the briefing held at a specified time will include the translated videotape. Applicants will be permitted to attend any briefing of their choice.

During the office appointment for intake onto the program and for any subsequent scheduled office appointments, PMHA will make every effort to provide translation services to applicants who requested services at the time of application. These services will be via Skype or telephone translation. Other options will be considered if those are not available.

VI. Outreach

PMHA outreach is conducted with the intent to reach all persons who may reasonably be expected to apply for services available through the agency. This includes placing notice of the HCV waiting list opening in the local paper of daily circulation. (Note: Public Housing waiting lists are open with the exception of the two bedroom waiting list). Notice of the wait list opening is also provided to every service agency and office in the Pickaway County area. From these efforts, word of mouth becomes a powerful source in outreach as is evident from the number of out of area applications received during the most recent waiting list opening.

Every effort is made to conduct outreach to meet the full intent of HUD's guidance on providing decent, safe and sanitary housing to persons without discrimination and in respect of the rights of all, while making every effort to further fair housing. Because PMHA serves a limited number of residents, the addition of the Somali applicants as residents through program participation will not increase the Arabic speaking population to 5% or 1,000 persons meaning there will continue to be no identified LEP within the jurisdiction. Therefore the intent of outreach will be to reach those who may be likely or eligible to apply. The purpose of this LAP is to acknowledge that it is likely we will receive applications from outside the jurisdiction that will include limited English speaking households and it is our obligation to provide services to all applicants to the best of our ability.

VII. Staff Training

PMHA will provide a copy of this LAP to all existing staff. PMHA staff has already received annual Fair Housing training and additional training specifically related to housing requirements when dealing with persons of non-English speaking persons. The trainings were conducted by a Fair Housing attorney from Columbus, Ohio and a second training by Southeastern Ohio Legal Aid.

VIII. Monitoring and Updating of this LAP

PMHA will review/revise this LAP as needed, but will review no less than annually to ensure the populations of any existing LEP is identified as a new language group within the jurisdiction. The needs of any newly identified LEP will be included in the revision.

Events that will be considered indicators of need for a review of the LAP and will also be utilized to identify the need for LEP assistance in other languages include but are not limited to LEP populations within the jurisdiction encountered or affected; frequency of encounters with LEP populations; and continued availability of existing resources and the addition of new resources.

PICKAWAY METROPOLITAN HOUSING AUTHORITY
SMOKE FREE POLICY
Adopted: August 12, 2016

The Board of Commissioners of the Pickaway Metropolitan Housing Authority met in Regular Session on Friday, August 12, 2016 with the following members present: (enter)

During Business Conducted While In Session, Commissioner (enter) offered the motion to adopt Resolution 16-6 as follows:

Whereas, due to the increased risk of fire, increased maintenance costs, and the known health effects of secondhand smoke, the United States Department of Housing & Urban Development is recommending and will soon be mandating that all properties under its jurisdiction become Smoke Free Housing facilities, then

Therefore Be It Resolved that the Board hereby declares all public housing properties, including the offices, garages and vehicles of the agency to be Smoke Free, and

Be It Further Resolved that the Board hereby adopts the following policy for the implementation of such directive:

"Due to the increased risk of fire, increased maintenance costs, and the known health effects of secondhand smoke, smoking is prohibited in any area of the property, both private and common, indoors and within 25 feet of the building, including entryways and patios and sidewalks. This policy applies to all owners, employees, tenants, guests, and service persons. Tenants are responsible for ensuring that family members, roommates and guests comply with this rule.

Please be advised that all new and renewed leases in this building prohibit smoking as described below. Until all leases have been renewed through 2017, you may have neighbors whose current lease does not prohibit smoking. Effective, January 1, 2018, full enforcement of this provision will begin.

The definition of smoking means any inhaling, exhaling, breathing, burning, or carrying or possessing any activated or lighted cigar, cigarette, pipe or other tobacco product, including vapor products, in any manner or form.

The enforcement of this policy will be as follows:
First violation: Verbal warning with offer of cessation assistance
Second violation: Written warning with offer of cessation assistance
Third violation: Written warning with required cessation activity within 7 days from the date of the written warning.
Fourth violation: Notice of termination of tenancy issued, with right of request to implement a six week stay of implementation while resident receives cessation assistance.
Fifth violation: Notice of termination of tenancy issued with no right of appeal or grievance.

Any report of smoking will be considered a reviewable violation", and

Be It Further Resolved, the Pickaway MHA Board of Commissioners directs the staff to meet with the Boards of the Agency's Management Properties for implementation of this policy for Pickaway Terrace, Louise Terrace, and Eden Place.

Commissioner (enter) seconded the motion and a vote on the motion was as follows:

PICKAWAY METROPOLITAN HOUSING AUTHORITY
SMOKING POLICY ADDENDUM
ADOPTED BY THE BOARD OF DIRECTORS
August 12, 2016

DATE:

RESIDENT NAME(S):

UNIT NUMBER:

Due to the increased risk of fire, increased maintenance costs, and the possible health effects of secondhand smoke, the Board of Directors for the Ashville Senior Housing Association, doing business as Louise Terrace, is adopting the following policy relating to smoking with covers all or part of the premises on which the dwelling unit is located (the "Premises"). The following terms, conditions and rules are hereby incorporated into the Rental Agreement.

1. **Smoking is prohibited on the entire property of Louise Terrace (see below for further information**
   NOTE: Smoke damage will never be considered normal wear and tear effective January 1, 2017. Tenants will be held financially responsible for the repair associated with damage caused by smoking.
2. **Definition of Smoking:** The term "smoking" means inhaling, exhaling, breathing, carrying, or possessing any activated vaping device, lighted cigar, cigarette, pipe, other tobacco product or any other similar lighted product in any manner or in any form.
3. **Resident Obligation:** Resident agrees and acknowledges that the entire Premises has been designated as a no-smoking living environment. Resident agrees that he/she will not smoke anywhere on the Premises or adjacent to and within 25 feet of the property of any portion of the Premises. Resident will not permit any guests, visitors or service personnel to smoke under these guidelines. Resident agrees to inform guests, visitors or service personnel of this requirement and agrees to ask anyone who violates this policy to leave. Resident is responsible for the actions of his/her guests and visitors
4. **Owner/Agent Not a Guarantor of Smoke-Free Environment:** Resident acknowledges that Owner/Agent's adoption of a policy relating to smoking, and the efforts to designate all of the Premises as non-smoking, do not make Owner or any of its managing agents the guarantor of Resident's health or of the smoke-free condition of the non-smoking portions of the Premises. However, Owner/Agent will take reasonable steps to enforce the no-smoking policy. Owner/Agent is not required to take steps in response to smoking unless Owner/Agent has actual knowledge of the smoking and the identity of the responsible resident.
5. **Owner/Agent Disclaimer:** Resident acknowledges that Owner/Agent's adoption of a non-smoking living environment, and the efforts to designate all or portions of the Premises as non-smoking, does not in any way change the standard of care that Owner/Agent has under applicable law to render the Premises any safer, more habitable or improved in terms of air quality standards than any other rental premises. Owner/Agent specifically disclaims any implied or express warranties that the Premises will have any higher or improved air quality standards than any other rental property. Owner/Agent cannot and does not warranty or promise that the Premises will be free from secondhand smoke. Resident acknowledges that Owner/Agent's ability to police, monitor or enforce this Addendum is dependent in significant part on voluntary compliance by residents and residents' guests. Residents with respiratory ailments, allergies or other conditions relating to smoke are put on notice that Owner/Agent does not assume any higher duty of care to enforce this Addendum than any other Owner/Agent obligation under the Rental Agreement.

6. **Effect on Current Resident:** Resident acknowledges that current residents residing on the premises under leases/rental agreements signed prior to adoption of this smoking policy may not be immediately subject to this smoking policy. As current residents move out, have current leases expire or enter into new leases/rental agreements, the smoking policy will become effective for them and their guests.
7. **Effect of Breach:** Resident understands and agrees with the terms and conditions of this Addendum and that failure to adhere to any of the terms of this Addendum will constitute both a material non-compliance with the Rental Agreement and a serious violation of the Rental Agreement. In addition, resident will be responsible for all costs to remove smoke odor or residue upon any violation of this Addendum.
8. **This property will implement the Smoke Free Housing Policy with the renewal of leases effective January 1, 2017. All new leases effective January 1, 2017 will be required to sign the Addendum. The Owner/Agent will begin working with residents on smoking cessation if requested in 2017 and Full Implementation of the Policy will begin in January, 2018.**

Resident	Date
Resident	Date
Resident	Date
Resident	Date
Resident	Date
Managing Agent Representative	Date

EQUAL HOUSING OPPORTUNITY

hio | Development Services Agency

John R. Kasich, Governor David Goodman, Director

August 2, 2016

Kim Hartinger, Executive Director
Pickaway Metropolitan Housing Authority
176 Rustic Drive
Circleville, Ohio 43113

Subject: Certification of Consistency with the State of Ohio's Consolidated Plan

Dear Ms. Hartinger:

Enclosed please find a certification that the 2017 Annual Plan for the Pickaway Metropolitan Housing Authority is consistent with the State of Ohio's Consolidated Plan.

If you have any questions or need further assistance, please contact me at (614) 466-2285.

Sincerely,

Ian Thomas, Planner
Office of Community Development

Enclosure

77 South High Street
P.O. Box 1001
Columbus, Ohio 43216-1001 U.S.A.

614 | 466 2480
800 | 848 1300
www.development.ohio.gov

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan (All PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB# 2577-0226 Expires 2/29/2016

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

I, *Matthew LaMantia, Interim Deputy Chief, OCD, Ohio Development Services Agency* certify that the Five-Year Plan and/or 2017 Annual PHA Plan of the *Pickaway Metropolitan Housing Authority* is consistent with the Consolidated Plan and the Analysis of Impediments (AI) to Fair Housing Choice of *the State of Ohio* prepared pursuant to 24 CFR Part 91.

The *Pickaway Metropolitan Housing Authority* Plan is consistent with the State Consolidated Plan and the AI in that they have the same objectives addressing needs and analysis of impediments to fair housing issues.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	Title
Matthew LaMantia	Interim Deputy Chief
Signature	Date
	August 2, 2016

Commissioners:
Harold R. Henson
Brian S. Stewart
Jay H. Wippel

Administrator:
Brad Lutz
Clerk:
Patricia Webb

Pickaway County
Board of County Commissioners
139 West Franklin Street
Circleville, Ohio 43113
Telephone: 740-474-6093 FAX: 740-474-8988
1-800-472-6093

August 16, 2016

Pickaway Metropolitan Housing Authority
Mrs. Kim Hartinger, Executive Director
176 Rustic Drive
Circleville, Ohio 43113

The Pickaway County Board of Commissioners has reviewed the Pickaway County Metropolitan Housing Authority's 2017 Annual Plan and finds that it is consistent with the Pickaway County Community Development Implementation Strategy (CDIS).

Sincerely,

Harold Henson

Harold Henson
President
PICKAWAY COUNTY BOARD OF COMMISSIONERS

OFFICE OF THE MAYOR
Donald R. McIlroy, Mayor

City Administration Building
104 East Franklin Street
Circleville, OH 43113
P: (740) 477-8200
F: (740) 477-8247
www.ci.circleville.oh.us

City of Circleville

Donald R. McIlroy
Mayor

August 9, 2016

Ms. Kim Hartinger
Executive Director
Pickaway Metropolitan Housing Authority
176 Rustic Drive
Circleville, OH 43113

Ms. Hartinger,

The City of Circleville has reviewed the Pickaway County Metropolitan Housing Authority's Annual Plan for 2017 and finds that it is consistent with the latest CHIS for the City of Circleville.

Sincerely,

Donald R. McIlroy
Mayor

Certifications of Compliance with PHA Plans and Related Regulations *(Standard, Troubled, HCV-Only, and High Performer PHAs)*	**U.S. Department of Housing and Urban Development** Office of Public and Indian Housing **OMB No. 2577-0226** **Expires 02/29/2016**

PHA Certifications of Compliance with the PHA Plan and Related Regulations including Required Civil Rights Certifications

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the___ 5-Year and/or_X_ Annual PHA Plan for the PHA fiscal year beginning __2017___, hereinafter referred to as" the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
   - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
   - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
   - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
   - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
   - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
14. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Pickaway Metropolitan Housing Authority

PHA Name

OH059

PHA Number/HA Code

_17__ Annual PHA Plan for Fiscal Year 20_17__

_____ 5-Year PHA Plan for Fiscal Years 20____ - 20____

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Authorized Official	Title
Daniel Litzinger	Chairman, Board of Commissioners
Signature	Date 9/9/16

form **HUD-50077-ST-HCV-HP** (12/2014)