

## **Attachment K: Biennial inspections and the use of alternative inspection methods and inspection timeframes**

Regulation: 24 CFR §§982.405, 983.103

Programs to which this provision applies: Housing Choice Voucher (including the project-based voucher program)

Description of change: This provision offers PHAs the discretion to conduct unit inspections biennially rather than annually, for both the HCV and PBV programs. It also authorizes the use of alternative inspection methods for periodic inspections, such as inspections performed by HUD or conducted pursuant to the HOME Investment Partnerships (HOME) program or housing financed using Low-Income Housing Tax Credits (LIHTCs). PHAs have the discretion to adopt either or both of these flexibilities.

These flexibilities are applicable only to periodic unit inspections conducted during the term of the assisted tenancy. Periodic inspections are those that a PHA is required to conduct at least biennially, while a HCV participant is living in a unit. Periodic inspections do not include inspections conducted prior to the initial term of the lease or to interim inspections. Under the PBV program, the flexibilities do not apply to inspections required prior to the execution of the HAP contract pursuant to 24 CFR §983.103(a) and (b).

Note that under the homeownership option, PHAs are required only to conduct pre-contract inspections; they have the *option* of conducting periodic inspections. If a PHA conducts periodic inspections, then it may do so biennially and/or by means of alternative methods, pursuant to the requirements detailed in this Notice (e.g., update of Admin. Plan, etc.).

*Biennial inspections.* This provision authorizes PHAs to conduct unit inspections every other year instead of annually. Permitting biennial inspections for HCV units will reduce the administrative and financial burden on PHAs and high-performing landlords and enable PHAs to concentrate their inspection resources on the more marginal and higher-risk units. Additionally, this provision can assist PHAs in avoiding duplicative inspections at properties where there are other program inspections, such as under the LIHTC program.

A PHA that moves to biennial inspections for all of the units in its portfolio does not need to update its Admin. Plan to reflect the change. By contrast, a PHA that continues to perform inspections annually across its portfolio must update its Admin. Plan; this is the case because the new requirement is that inspections take place at least biennially, and the PHA is exercising the discretion to continue with annual inspections. Likewise, a PHA that employs both annual and biennial inspections must adopt policies in its Admin. Plan that specify the circumstances under which biennial inspections will be employed and the circumstances under which annual inspections will be employed. These policies must be applied uniformly. For example, a PHA might move to biennial inspections for units in properties that are already inspected annually under a local housing code enforcement program or any unit that receives a “pass” score under HQS for two or more years in a row. A PHA might continue with annual inspections of any units not inspected annually under another program or any unit that had health and safety deficiencies during its previous HQS inspection.

While this provision is intended to offer administrative relief to PHAs, it is not intended to do so at the expense of decent, safe, and sanitary housing. PHAs are discouraged from establishing policies that specify the use of biennial inspections based on factors unrelated to an owner's record of providing housing that is decent, safe, and sanitary, such as the distance of the unit from the PHA's office. While factors such as distance may be taken into account, HUD encourages PHAs to consider factors other than distance — such as the record of the unit itself — in deciding whether to employ biennial inspections.

PHAs should continue to submit the Form HUD-50058 into the Public Housing Information System (PIC) as currently required. The SEMAP module has been modified to accept inspection dates of greater than 12 months since last inspection. Inspection dates submitted into PIC will now be counted as late if they show a time of greater than 26 months since the previous inspection.

*Alternative inspection methods.* The purpose of this provision is to authorize inspection by methods other than HQS. Inspection by such alternative methods is limited, as described below.

PHAs may rely upon two different categories of alternative inspections: (1) inspections conducted by HUD's Real Estate Assessment Center (REAC) or under the HOME or LIHTC program; or (2) other inspection methods that meet or exceed HQS and have been approved by HUD's Real Estate Assessment Center. No matter which option a PHA selects, it must amend its Admin. Plan prior to employing such option.

- REAC/HOME/LIHTC inspections. Inspections covered by REAC, HOME, and LIHTC employ unit sampling. The regulation requires HCV and PBV units be included in the universe of units forming the basis of the sample. For example, if a 100-unit property includes 20 units that are occupied by HCV-assisted families or are under a PBV HAP contract, then those 20 units must be included in the universe of units from which the sample is pulled. This requirement does not mean that the 20 units must be included in the actual sample; it means only that the units must have the potential to be selected for the sample by virtue of being included in the universe of sampled units.
- Other inspection methods. In order to rely on inspections other than those covered by REAC, HOME, or LIHTC, a PHA must submit to HUD the inspection method and an analysis showing that the method meets or exceeds HQS. A PHA may not rely upon such a method unless and until HUD has reviewed and approved use of the method. Once HUD has approved the inspection method, then the PHA must amend its Admin. Plan, making clear the specific properties or types of properties for which the inspection method will be employed. If the inspection method relies upon sampling, then the HCV/PBV units must be included in the population of units forming the basis of the sample, as described above.

HUD will not approve a method that fails to assess the performance requirements and acceptability criteria of unit inspection standards outlined at 24 CFR §982.401, or any successor standard. As with HQS, HUD may approve variations to alternate inspection methods only for the purposes outlined at 24 CFR §982.401(a)(4)(ii), and then only if the variations meet the standard for approval at 24 CFR §982.401(a)(4)(iii). If a method fails to meet these requirements, then HUD will not approve its use.

*Mixed-finance properties and triennial inspections.* For purposes of this provision, a mixed-finance property is defined as a property that is assisted under the PBV program and is financed under a federal, state, and/or local housing program. A PHA may rely on an inspection of a mixed-finance property conducted using an alternative inspection method to meet the requirement at 24 CFR 982.405(a), if the inspection happens no less frequently than triennially.

As with all other inspection reports required under § 982.158(f)(4), reports for alternative inspection methods must be obtained by the PHA from the entity inspecting the units. Such reports must be available for HUD inspection for at least three years from the date of the latest inspection.

PHAs must receive inspection reports and other data from any entity conducting an inspection using an alternative method within 5 business days of the inspection. Prompt analysis of inspection results enable a PHA to determine if any identified deficiencies would result in HQS failure. Memorandums of understanding or other agreements could be used by the PHA and other entity to ensure timely data submission.

PHAs that use inspections conducted with alternative methods, including methods that employ sampling, must continue to submit the Form HUD-50058 into the PIC system in the same manner, which includes providing the date of last inspection, and the date the unit last passed inspection. For methods that employ sampling, the date of the inspection will be used for all units in the universe, even if those units were not selected for inspection. The SEMAP system has been modified to accept inspection dates of greater than 12 months since last inspection. Inspection dates submitted into PIC will now be counted as late if they show a time of greater than 26 months since last inspection.

*Limitations on the use of alternative inspection methods.* A PHA may rely upon an alternative inspection method to demonstrate compliance with the inspection requirement of 24 CFR 982.405(a) in two circumstances:

- In the case of an alternative method that employs a “pass/fail” scoring system, the property inspected pursuant to such alternative method receives a “pass” score. A PHA may rely on an alternative method if the property receives a “pass” score, even if deficiencies are identified.
- In the case of an alternative method that results in a list of deficiencies (without a “pass/fail” designation), the PHA determines that none of the cited deficiencies would have resulted in a “fail” score under HQS.

Under any circumstance in which a PHA is prohibited from relying on an alternative inspection method for a property, the PHA must promptly conduct an HQS inspection of all units occupied by voucher program participants, and follow HQS procedures to remedy any identified deficiencies, as required under the HQS inspection method.

*Duty to inspect.* Irrespective of the biennial/alternative inspection method provision, a PHA has a duty to inspect a unit when a participant family or government official reports a condition that violates HQS. If the condition is life-threatening (i.e., the PHA would require the owner to make the repair within no more than 24 hours in accordance with § 982.404(a)(3)), then the PHA must

inspect the unit within 24 hours of when the PHA receives the notification. If the condition is not life-threatening (i.e., the PHA would require the owner to make the repair within no more than 30 calendar days), then the PHA must inspect the unit within 15 days of when the PHA receives the notification. In the event of extraordinary circumstances, such as if a unit is within a presidentially declared disaster area or if a natural or manmade disaster makes inspection of a unit infeasible, HUD may waive the 24-hour or the 15-day inspection requirement until such time as an inspection can be made. In such circumstances, a PHA must submit a waiver request to its local HUD field office, stating the regulation from which a waiver is requested and including an explanation of why it is needed.

Background: The biennial inspections provision was put into place to enable PHAs to expend relatively fewer resources inspecting units that perform consistently well or are typically inspected by more than one oversight entity and relatively more resources inspecting other units. The alternative inspections provision is intended to address the fact that a property that has more than one funding source may be subject to more than one physical inspection using more than one method. The goal of this provision is to eliminate duplicative inspections while assuring that families with HUD assistance have access to decent, safe, and sanitary housing that is in good repair.

Mandatory or discretionary: PHAs are now authorized to inspect units at least biennially during the term of the assisted tenancy. PHAs have the *discretion*, however, to inspect units more frequently than required. PHAs also have the *discretion* to use alternative inspection methods in accordance with HUD requirements. In those cases where a PHA elects to inspect more frequently than biennially, for some or all of its units, or use an alternative inspection method, its Admin. Plan must be revised.

At any time, if a participant family or government official reports a condition that violates HQS, a PHA must inspect the subject unit within the timeframes described above.

Effective date: This provision has been in effect since July 1, 2014. (See *Federal Register* Notice 79 FR 35940, “HUD Implementation of Fiscal Year 2014 Appropriations Provisions on Public Housing Agency Consortia, Biennial Inspections, Extremely Low-Income Definition and Utility Allowances”).

## **Attachment L: Housing Quality Standards reinspection fee**

Regulation: 24 CFR §982.405

Programs to which this provision applies: Housing Choice Voucher (including project-based voucher)

Description of change: This provision offers PHAs the option to establish a reasonable fee to owners for a reinspection under two circumstances: (1) if an owner notifies the PHA that a deficiency cited in the previous inspection has been repaired and a reinspection reveals that it has not and/or (2) if the allotted time for repairs has elapsed and a reinspection reveals that any deficiency cited in the previous inspection that the owner is responsible for repairing has not been corrected.

A fee will be considered reasonable if it reflects local practices for the establishment of similar fees. PHAs may wish to inquire with local authorities regarding how such fees are established.

PHAs must not apply the fee to an owner for:

- deficiencies caused by the participant family;
- initial inspections;
- regularly scheduled inspections;
- an instance in which an inspector was unable to gain access to a unit; or
- new deficiencies identified during a reinspection. If new deficiencies are uncovered during reinspection, a PHA should follow normal procedures to address these newly identified deficiencies.

An owner who is assessed a fee may not pass the fee on to a family.

In the case of PHA-owned units, inspections and re-inspections must be performed by a HUD-approved entity in accordance with 24 CFR §982.352(b)(3) and §983.103(f)(1)). In this circumstance, and in any case in which inspections are performed by an entity other than the PHA (e.g., unit of local government, contractor), the details of any reinspection fee must be spelled out in the contractual arrangement between the PHA and the entity. (Notice PIH 2015–05 addresses the inspection of PBV units and steps that must be taken in the event the independent entity discovers an HQS violation.)

Fees collected under this reinspection fee authority will be considered unrestricted net assets.

Background: It is burdensome and costly for PHAs to have to inspect units multiple times.

Mandatory or discretionary: Discretionary. A PHA that intends to adopt a reinspection fee must amend its Admin. Plan to make clear when a fee will be assessed. For example, it must make clear whether the fee will be assessed after the first reinspection or after the second reinspection.

The Admin. Plan must also make clear, in each circumstance, what the specific fee amount will be.

In determining whether to adopt a fee, a PHA must ensure that such a fee is not prohibited by state or local law. PHAs are encouraged to consider whether the adoption of a fee may deter landlords from participating in the HCV or PBV programs. For example, if the allotted time for repairs has elapsed and a reinspection reveals that a deficiency cited in the previous inspection that the owner is responsible for repairing has not been corrected, a PHA is already required to take remedial action and will have to decide whether to assess a fee, as well, in accordance with their Admin. Plan.

Effective date: April 7, 2016

## **Attachment M: Exception payment standards for providing reasonable accommodations**

Regulation: 24 CFR §§982.503, 982.505

Program to which this provision applies: Housing Choice Voucher

Description of change: This provision authorizes a PHA to approve a payment standard of not more than 120 percent of the FMR without HUD approval if requested as a reasonable accommodation by a family that includes a person with a disability.

A PHA that adopts this provision must maintain documentation that shows:

- a rent reasonableness analysis was conducted in accordance with the HCV program regulations at 24 CFR 982.507;
- the family requested lease approval for the unit and requested an exception payment standard as a reasonable accommodation; and
- the unit has features that meet the needs of a family member with disabilities. For example, a unit may be suitable because of its physical features or for other reasons, such as having the requisite number of bedrooms, location on an accessible transit route, or proximity to accessible employment, education, services, or recreation.

A PHA may accept a verbal request for a reasonable accommodation from a family. PHAs are advised to make clear in their Admin. Plan whether the request must be in writing and/or include supporting documentation, for example from a medical professional.

Background: Under the preceding regulations, a PHA had to request a waiver from a HUD Field Office for an exception payment standard above 110 percent of the FMR, consuming considerable administrative time and resulting in delays that, in some cases, caused families to miss out on desired units. Under this provision, a PHA may approve a payment standard of not more than 120 percent of the FMR without HUD approval if required as a reasonable accommodation for a family that includes a person with disabilities.

Mandatory or discretionary: Discretionary

Effective date: April 7, 2016

**Attachment N: Family income and composition: regular and interim examinations**

Regulation: 24 CFR §§982.516(c) through (e)

Program to which this provision applies: Housing Choice Voucher

Description of change: This provision eliminates the requirement that a voucher agency conduct a reexamination of income whenever a new family member is added. The provision does *not* eliminate the requirement to verify other aspects of program eligibility (e.g., SSNs, criminal history, etc.), nor does it eliminate the requirement to perform annual reexaminations of family income (for example, if that happens to be the point at which a new family member is added); it simply eliminates the requirement to perform an interim reexamination of income whenever a new family member is added.

A PHA that adopts this provision must make clear in its Administrative Plan how it will address the addition of a new family member under the age of 6 years, in the event the new family member is added at a time other than during a reexamination. Per 24 CFR §5.216(e)(2)(ii)(B), such a family member is to be counted as a member of the assisted household, meaning that the family becomes entitled to the dependent deduction. A PHA that adopts this provision may decide, for example, to require a full reexamination of income whenever a child under the age of 6 years is added to a family. The PHA's policy on the addition of such family members must be spelled out in its Administrative Plan.

Background: This change makes it possible for a PHA, if it so chooses, to align interim examination requirements across the public housing and Housing Choice Voucher programs.

Mandatory or discretionary: Discretionary. PHAs retain the discretion to perform interim reexaminations when a new family member is added. An agency's ACOP for public housing and HCV Admin. Plan must describe the regular and interim examination policies.

Effective date: April 7, 2016

## **Attachment O: Utility payment schedules**

Regulation: 24 CFR §982.517

Program to which this provision applies: Housing Choice Voucher

Description of change: This provision requires PHAs to use the appropriate utility allowance for the lesser of the size of dwelling unit actually leased by the family or the voucher size issued, as determined under the PHA subsidy standards.

In cases where a reasonable accommodation has been provided to a family that includes a person with disabilities, the PHA must use the appropriate utility allowance for the size of the dwelling unit actually leased by the family. To ensure compliance with this provision, PHAs may employ ad hoc reports that are available through the Inventory Management System/Public and Indian Housing Information Center, as explained in Notice PIH 2014–25 (“Over Subsidization in the Housing Choice Voucher Program”).

Background: This provision was enacted as a cost-saving measure.

Mandatory or discretionary: Mandatory

Effective date: This provision has been in effect since July 1, 2014. (See *Federal Register* Notice 79 FR 35940, “HUD Implementation of Fiscal Year 2014 Appropriations Provisions on Public Housing Agency Consortia, Biennial Inspections, Extremely Low-Income Definition and Utility Allowances”).



## Flat Rent Policy<sup>1</sup>

As of April 17<sup>th</sup>, 2014, the Pike County Housing Authority Board of Commissioners establishes by resolution the following change to our flat rent schedule.

The Pike County Housing Authority's flat rent schedule will be set at 80% of the HUD determined Final Fair Market Rents for each fiscal year. This change will be in effect for all bedroom sizes that the Pike County Housing Authority maintains.

As indicated by the below example the change for fiscal year 2014;

<u>2014 FMR By Unit Bedrooms</u>	<u>New Flat Rent – 80% FMR</u>	<u>Previous Flat Rent</u>
1BR - \$537.00	\$430.00	\$241.00
2BR - \$637.00	\$510.00	\$298.00
3BR - \$835.00	\$668.00	\$404.00
4BR - \$1114.00	\$891.00	\$485.00

It is to be understood that the flat rent schedule will adjust on an annual basis in accordance with the published HUD determined Final Fair Market Rents for each fiscal year.

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<sup>1</sup> 4/17/14 Revision



# FY 2017 FAIR MARKET RENT DOCUMENTATION SYSTEM

## The Final FY 2017 FMRs for All Bedroom Sizes

### Final FY 2017 & Final FY 2016 FMRs By Unit Bedrooms

Year	<u>Efficiency</u>	<u>One-Bedroom</u>	<u>Two-Bedroom</u>	<u>Three-Bedroom</u>	<u>Four-Bedroom</u>
Final FY 2017 FMR	\$456	\$492 <b>\$394</b>	\$654 <b>\$523</b>	\$869 <b>\$695</b>	\$901 <b>\$721</b>
<u>Final FY 2016 FMR</u>	\$446	\$474 <b>\$379</b> Up \$15	\$635 <b>\$508</b> Up \$15	\$870 <b>\$696</b> Down \$1	\$993 <b>\$794</b> Down \$73
Percentage Change	2.2%	3.8%	3.0%	-0.1%	-9.3%

Pike County, IL is a non-metropolitan county.

### Fair Market Rent Calculation Methodology

[Show/Hide Methodology Narrative](#)

Fair Market Rents for metropolitan areas and non-metropolitan FMR areas are developed as follows:

1. 2010-2014 5-year American Community Survey (ACS) estimates of 2-bedroom adjusted standard quality gross rents calculated for each FMR area are used as the new basis for FY2017 provided the estimate is statistically reliable. For FY2017, the test for reliability is whether the margin of error for the estimate is less than 50% of the estimate itself.

If an area does not have a reliable 2010-2014 5-year, HUD checks whether the area has had at least minimally reliable estimate in any of the past 3 years, or estimates that meet the 50% margin or error test described above. If so, the FY2017 base rent is the average of the inflated ACS estimates.

If an area has not had a minimally reliable estimate in the past 3 years, the estimate State for the area's corresponding metropolitan area (if applicable) or State non-metropolitan area is used as the basis for FY2017.

2. HUD calculates a recent mover adjustment factor by comparing a 2014 1-year 40th percentile recent mover 2-bedroom rent to the 2010-2014 5-year 40th

percentile adjusted standard quality gross rent. If either the recent mover and non-recent mover rent estimates are not reliable, HUD uses the recent mover adjustment for a larger geography. For metropolitan areas, the order of geographies examined is: FMR Area, Entire Metropolitan Area (for Metropolitan Sub-Areas), State Metropolitan Portion, Entire State, and Entire US; for non-metropolitan areas, the order of geographies examined is: FMR Area, State Non-Metropolitan Portion, Entire State, and Entire US. The recent mover adjustment factor is floored at one.

3. HUD calculates the appropriate recent mover adjustment factor between the 5-year data and the 1-year data and applies this to the 5-year base rent estimate.
4. Rents are calculated as of 2015 using the relevant (regional or local) change in gross rent Consumer Price Index (CPI) from annual 2014 to annual 2015.
5. All estimates are then inflated from 2015 to FY2017 using a national trend factor based on the forecast of gross rent changes through FY2017.
6. FY2017 FMRs are then compared to a State minimum rent, and any area whose preliminary FMR falls below this value is raised to the level of the State minimum.

**The results of the Fair Market Rent Step-by-Step Process**

1. The following are the 2014 American Community Survey 5-year 2-Bedroom Adjusted Standard Quality Gross Rent estimate and margin of error for Pike County, IL.

Area	ACS <sub>2014</sub> 5-Year 2-Bedroom Adjusted Standard Quality Gross Rent	ACS <sub>2014</sub> 5-Year 2-Bedroom Adjusted Standard Quality Gross Rent Margin of Error	Ratio	Result
Pike County, IL	<u>\$511</u>	\$46	$\frac{\$46}{\$511} = 0.09$	0.09 < .5 Use ACS <sub>2014</sub> 5-Year Pike County, IL 2-Bedroom Adjusted Standard Quality Gross Rent

Since the ACS<sub>2014</sub> Margin of Error Ratio is less than .5, the ACS<sub>2014</sub> Pike County, IL value is used for the estimate of 2-Bedroom Adjusted Standard Quality Gross Rent:

Area	FY2017 Base Rent

Pike County, IL	\$511
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2. A recent mover adjustment factor is applied based on the smallest area of geography which contains Pike County, IL and has an ACS<sub>2014</sub> 1-year Adjusted Standard Quality Recent-Mover estimate with a Margin of Error Ratio that is less than .5.

Area	ACS <sub>2014</sub> 1-Year Adjusted Standard Quality Recent-Mover Gross Rent	ACS <sub>2014</sub> 1-Year Adjusted Standard Quality Recent-Mover Gross Rent Margin of Error	Ratio	Result
Pike County, IL – 2 Bedroom	N/A	N/A	N/A	No ACS <sub>2014</sub> 1-Year 2-Bedroom Adjusted Standard Quality Recent-Mover Gross Rent Produced For Pike County, IL
Illinois Non-metropolitan Portion – 2 Bedroom	<a href="#">\$610</a>	\$21	0.034	0.034 < .5 Use ACS <sub>2014</sub> 1-Year Non-metropolitan Portion 2-Bedroom Adjusted Standard Quality Recent-Mover Gross Rent

The smallest area of geography which contains Pike County, IL and has an ACS<sub>2014</sub> 1-year Adjusted Standard Quality Recent-Mover estimate with a Margin of Error Ratio that is less than .5 is the Illinois Non-metropolitan Portion.

3. The calculation of the relevant Recent-Mover Adjustment Factor for Pike County, IL is as follows:

ACS <sub>2014</sub> 5-Year Area	ACS <sub>2014</sub> 5-Year 40th Percentile Adjusted Standard Quality Gross Rent	ACS <sub>2014</sub> 1-Year 40th Percentile Adjusted Standard Quality Recent-Mover Gross Rent
Illinois Non-metropolitan Portion – 2 Bedroom	<a href="#">\$592</a>	<a href="#">\$610</a>

Area	Ratio	Recent-Mover Adjustment Factor
Pike County,	\$610 / \$592	1.030 ≥ 1.0 Use calculated Recent-Mover Adjustment

IL	=1.030	Factor of 1.030
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4. The calculation of the relevant CPI Update Factors for Pike County, IL is as follows: HUD updates the 2014 intermediate rent with the ratio of the annual 2015 local or regional CPI to the annual 2014 local or regional CPI to establish rents as of 2015.

	<b>Update Factor</b>	<b>Type</b>
CPI Update Factor	<a href="#">1.0126</a>	Region CPI

5. The calculation of the Trend Factor is as follows: HUD forecasts the change in national gross rents from 2015 to 2017. This makes Fair Market Rents "as of" FY2017.

<b>National Trend Factor</b>
<a href="#">1.0531</a>

6. The FY 2017 2-Bedroom Fair Market Rent for Pike County, IL is calculated as follows:

<b>Area</b>	<b><a href="#">ACS<sub>2014</sub> 5-Year Estimate</a></b>	<b><a href="#">Recent-Mover Adjustment Factor</a></b>	<b><a href="#">Annual 2014 to 2015 CPI Adjustment</a></b>	<b><a href="#">Trending 1.0531 to FY2017</a></b>	<b>FY 2017 2-Bedroom FMR</b>
Pike County, IL	\$511	1.030	1.0126	1.0531	$\$511 * 1.030 * 1.0126 * 1.0531 = \$561$

7. In keeping with HUD policy, the preliminary FY 2017 FMR is checked to ensure that it does not fall below the state minimum.

<b>Area</b>	<b>Preliminary FY2017 2-Bedroom FMR</b>	<b>FY 2017 Illinois State Minimum</b>	<b>Final FY2017 2-Bedroom FMR</b>
Pike County, IL	\$561	<a href="#">\$654</a>	$\$561 \leq \$654$ Use Illinois minimum of \$654

**Final FY2017 Rents for All Bedroom Sizes for Pike County, IL**

The following table shows the Final FY 2017 FMRs by bedroom sizes.

Click on the links in the table to see how the bedroom rents were derived.

**Final FY 2017 FMRs By Unit Bedrooms**

	<u><a href="#">Efficiency</a></u>	<u><a href="#">One-Bedroom</a></u>	<u><a href="#">Two-Bedroom</a></u>	<u><a href="#">Three-Bedroom</a></u>	<u><a href="#">Four-Bedroom</a></u>
Final FY 2017 FMR	\$456	\$492	\$654	\$869	\$901

The FMRs for unit sizes larger than four bedrooms are calculated by adding 15 percent to the four bedroom FMR, for each extra bedroom. For example, the FMR for a five bedroom unit is 1.15 times the four bedroom FMR, and the FMR for a six bedroom unit is 1.30 times the four bedroom FMR. FMRs for single-room occupancy units are 0.75 times the zero bedroom (efficiency) FMR.

Permanent link to this page: [http://www.huduser.gov/portal/datasets/fmr/fmrs/FY2017\\_code/2017summary.odn?&year=2017&fmrtype=Final&selection\\_type=county&fips=1714999999](http://www.huduser.gov/portal/datasets/fmr/fmrs/FY2017_code/2017summary.odn?&year=2017&fmrtype=Final&selection_type=county&fips=1714999999)

### Select a different area

Press below to select a different county within the same state (same primary state for metropolitan areas):

Adams County, IL	▲	Select a new county
Alexander County, IL	■	
Bond County, IL		
Boone County, IL		
Brown County, IL	▼	

Press below to select a different state:

Select a Final FY 2017 Metropolitan FMR Area:

Abilene, TX MSA	▼
Select Metropolitan FMR Area	

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| [FMR/IL Summary System](#) | [Multifamily Tax Subsidy Project \(MTSP\) Income Limits](#) | [HUD LIHTC Database](#) |

Prepared by the [Economic and Market Analysis Division](#), HUD. Technical problems or questions? [Contact Us](#).

**Pike County Housing Authority**  
**Trespass Policy**<sup>i</sup>

**Introduction**

This section explains the Pike County Housing Authority’s (PCHA) trespass policy, based on HUD regulations, HUD guidance, and PCHA policy decisions.

PCHA policies related to trespass are broken out into 5 sections:

**Section I: Residents Right to Guests and Visitors.** This section describes PCHA’s resident’s rights to have guests and visitors.

**Section II: Authorized Persons.** This section describes what persons are considered authorized to enter the premises of PCHA property.

**Section III: Unauthorized Persons.** This section describes what persons are NOT considered authorized to enter the premises of PCHA property.

**Section IV: Criminal Trespass.** This section defines criminal trespass, describes what criminal trespass is, who is subjected to that status, and how long the status remains with the person.

**Section V: Criminal Trespass Appeals.** This section describes the resident’s right to appeal the criminal trespass status.

**Section I: Residents Right to Guests and Visitors**

**I.A. Overview**

The PCHA has substantial and meaningful ties to the residents of public housing and the surrounding communities. For this reason, it is essential to establish policies that protect the right of tenants to have visitors and provide the PCHA with a tool to keep disruptive and dangerous persons off of housing development property.

HUD provides no guidance on the subject of trespass. Therefore, the PCHA must have specific policies in place to deal with the issue in an ethical and legally sound manner.

**I.B. Guests and Visitors**

PCHA Policy

PCHA residents have a right to have both visitors and guests to their public housing unit. A visitor is an individual who is not being provided accommodations (staying) in the unit. A guest is a person who is being provided accommodations (staying) in the unit. The resident is responsible for the behavior of both visitors and guests. Both visitors and guests must conduct themselves in a manner that is not in violation of the tenant’s lease.

**I.C. Approval of Guests and Visitors**

PCHA Policy

All guests require prior written approval of the PCHA since they are being provided accommodations (staying) in the unit. Visitors do not require prior written approval of the PCHA since they are not being provided accommodations (staying) in the unit.

## **Section II: Authorized Persons**

### **II.A. Authorized Persons**

HUD guidance regarding trespass is minimal, leaving it up to the PCHA to develop reasonable policies.

The PCHA can define what persons are authorized to be on the public housing property. For example, the PCHA may only authorize residents to be present on the property or the PCHA may also allow guests and visitors to be present.

#### PCHA Policy

Entrance to PCHA property is restricted to PCHA residents, their household members, authorized guests, and visitors entering with the resident's permission, as well as PCHA staff, commissioners, PCHA agents, contractors, security and law enforcement officials carrying out official PCHA or law enforcement business.

### **II.B. Visitors Entering with Resident's Permission**

The PCHA can require written notification from the resident when a visitor is expected, or the PCHA could seek a resident's approval of that visitor at the time the visitor enters the property.

#### PCHA Policy

The PCHA will not require written notification from the resident when a visitor is expected, but the PCHA will seek a resident's approval of a visitor's presence at the time when a visitor is observed on the property. If the PCHA is unable to confirm the tenant's approval of that visitor, they will be required to leave the property.

## **Section III: Unauthorized Persons**

### **III.A. Unauthorized Persons**

The PCHA has discretion to define what persons are not authorized to enter the public housing property.

#### PCHA Policy

The following persons are not authorized to enter the public housing property:

- Visitors who do not have the approval of the tenant to visit their unit.
- Residents without valid identification.
- Residents or persons who are "barred" for Criminal Trespass from any PCHA property.
- Evicted from federally assisted housing for drug-related criminal activity.

- Convicted of the production or manufacture of methamphetamine on the premises of federally assisted housing.
- Registered sex offenders.
- Felons convicted of the production of methamphetamines.

### **III.B. Consequences for Unauthorized Persons**

#### PCHA Policy

The PCHA or its agents will require unauthorized persons to immediately leave the property. If the unauthorized persons immediately leave the property then there will be no further action. If the unauthorized persons do not immediately leave the property then they will be subject to the Criminal Trespass provision in this policy as outlined in Section IV, below.

### **SECTION IV: Criminal Trespass**

#### **IV.A. Overview**

If it becomes necessary to hold someone responsible for trespassing on public housing property, it is essential that the policies for doing so are specific, understandable, and available to all effected.

#### **IV.B. Definition of Criminal Trespass**

##### PCHA Policy

The definition of Criminal Trespass for this policy is the definition of such found in the State of Illinois statutes.

Criminal Trespass is when a person knowingly and without legal authority enters or remains within or on a building; or enters upon the land of another after receiving, prior to such entry, notice from the owner or occupant that such entry is forbidden; or remains upon the land of another, after receiving notice from the owner or occupant to depart; or presents false documents or falsely represents his or her identity orally to the owner or occupant of a building or land in order to obtain permission from the owner or occupant to enter or remain in the building or on the land.

A person has received notice from the owner or occupant, that he/she has been notified personally, either orally or in writing, of a printed or written notice forbidding such entry that has been conspicuously posted or exhibited, at the main entrance to such land or the forbidden part thereof.

#### **IV.C. Persons Subject to Criminal Trespass**

##### PCHA Policy

Persons who are considered to be in violation of the Criminal Trespass statute, and therefore this policy, are unauthorized persons who do not leave the public housing property when required to do so by this policy, the PCHA, the PCHA's agents, or those whose behavior on site is a:

- Disturbance of the resident's peaceful enjoyment of the premises.

- Destruction of the public housing property.
- Threat to the health or safety of residents, PCHA staff, or their agents.
- Drug-related criminal activity.
- Illegal use of a drug.
- Pattern of illegal use of a drug that interferes with the health, safety, or right to peaceful enjoyment of the premises by residents.
- Criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents (including PCHA staff residing on the premises) or by persons residing in the immediate vicinity of the premises.
- Abuse of alcohol or a pattern of abuse of alcohol that threatens the health, safety, or right to peaceful enjoyment of the premises by residents.

#### **IV.D. Consequences of Criminal Trespass**

##### PCHA Policy

When a person is subject to the Criminal Trespass statute and this policy, they:

- Must leave the property immediately or the PCHA will have them arrested for Criminal Trespass.
- Must not return to the property or any other PCHA property or the PCHA will have them arrested for Criminal Trespass.
- Residents known to associate with a banned individual shall receive notice that the individual is banned from PCHA property. The notice shall also state that pursuant to the Resident's lease, the resident or members of the resident's household shall not allow the individual who has been banned from entering the property. Allowing the individual onto PCHA property shall be considered a lease violation.

#### **IV.E. Criminal Trespass Resulting in "Barred" Status**

##### PCHA Policy

Persons who are subject to the Criminal Trespass statute and this policy will be "barred" from the property where the incident(s) occurred and any other PCHA property for the time periods noted in Section IV.F., unless they have been successful in seeking "appeal" from the PCHA as detailed in Section V.A.

#### **IV.F. Length of Criminal Trespass for "Barred" Status**

##### PCHA Policy

The persons subject to the Criminal Trespass provision in this policy will be considered to be “barred” from PCHA property for the following time periods:

**One year**

- Visitors who do not have the approval of the tenant to visit their unit.
- Residents or persons “barred” for Criminal Trespass from any PCHA property for reasons other than those listed in Section IV.F.

**Five Years – Misdemeanors**

- Registered Sex Offenders other than those subject to life time registration.
- Drug-related criminal activity.
- Violent criminal activity.
- Criminal activity that threatens the health, safety, or welfare of tenants includes:
  - Criminal activity that threatens the health or safety of PCHA staff, contractors, subcontractors, or agents.
  - Criminal sexual conduct, including but not limited to sexual assault, incest, open and gross lewdness, or child abuse.

**Ten Years – Felonies**

- Registered Sex Offenders other than those subject to life time registration.
- Drug-related criminal activity.
- Violent criminal activity.
- Criminal activity that threatens the health, safety, or welfare of tenants includes:
  - Criminal activity that threatens the health or safety of PCHA staff, contractors, subcontractors, or agents.
  - Criminal sexual conduct, including but not limited to sexual assault, incest, open and gross lewdness, or child abuse.

**Lifetime**

- Conviction for drug-related criminal activity for the production or manufacture of methamphetamine on the premises of federally assisted housing.

- Subject to a lifetime registration requirement under a state sex offender registration program.

## **SECTION V: Criminal Trespass Appeals**

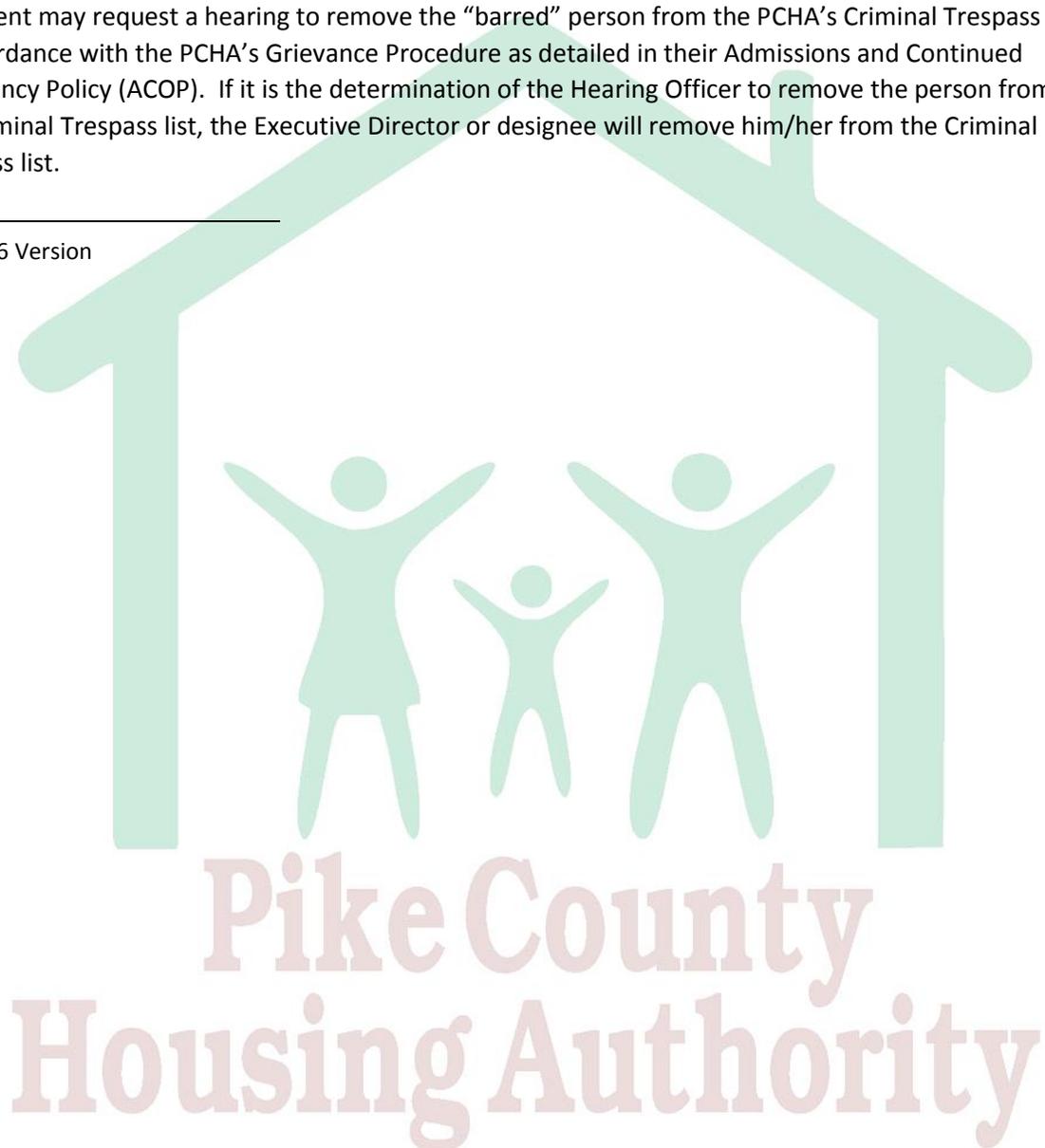
### **V.A. Criminal Trespass Appeals Process**

#### PCHA Policy

A resident may request a hearing to remove the “barred” person from the PCHA’s Criminal Trespass list in accordance with the PCHA’s Grievance Procedure as detailed in their Admissions and Continued Occupancy Policy (ACOP). If it is the determination of the Hearing Officer to remove the person from the Criminal Trespass list, the Executive Director or designee will remove him/her from the Criminal Trespass list.

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8/18/16 Version



**Civil Rights Certification**  
*(Qualified PHAs)*

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB Approval No. 2577-0226  
Expires 02/29/2016

**Civil Rights Certification**

**Annual Certification and Board Resolution**

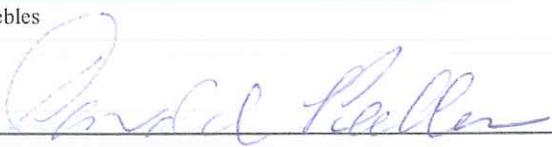
*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official, I approve the submission of the 5-Year PHA Plan for the PHA of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the public housing program of the agency and implementation thereof:*

The PHA certifies that it will carry out the public housing program of the agency 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, and will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those program, addressing those impediments in a reasonable fashion in view of the resources available and working 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.

Pike County Housing Authority  
\_\_\_\_\_  
PHA Name

IL071  
\_\_\_\_\_  
PHA Number/HA Code

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 Don Peebles	Title Board Chairman
Signature 	Date 3-5-16

## Violence Against Women Act (VAWA) Policy

Title VI of the VAWA adds a new housing provision that establishes several categories of protected individuals. Under the law victims of domestic violence, dating violence, sexual assault, and stalking are granted protections and cannot be denied or terminated from housing or housing assistance because of activity that is directly related to domestic violence. 2005 VAWA Pub. L. 109-162; Stat. 2960 signed into law on January 5, 2006 and codified at 42 U.S.C. §1437d(l) and 1435f(d), (0) & 1 and (u)

### 1.1 Purpose

The purpose of this Policy is to reduce domestic violence, dating violence, and stalking and to prevent homelessness by:

- (a) protecting the safety of victims;
- (b) creating long-term housing solutions for victims;
- (c) building collaborations among victim service providers; and
- (d) assisting PCHA to respond appropriately to the violence while maintaining a safe environment for PCHA, employees, tenants, applicants, program participants and others.

The policy will assist the Pike County Housing Authority (PCHA) in providing rights under the Violence Against Women Act to its applicants, public housing residents, and other program participants.

This Policy is incorporated into PCHA's "Admission and Continued Occupancy Policy" and applies to all PCHA housing programs.

### 2.1 Definitions

The definitions in this Section apply only to this Policy.

- 2.2 **Confidentiality:** Means that PCHA will not enter information provided to PCHA by a victim alleging domestic violence into a shared database or provide this information to any related entity except as stated in 3.4
- 2.3 **Dating Violence:** Violence committed by a person (a) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (b) where the existence of such relationship shall be determined based on a consideration of the following factors: (i) the length of the relationship; (ii) the type of relationship; (iii) the frequency of interaction between the persons involved in the relationship. 42 U.S.C. §1437d (u)(3)(A), § 13925.

- 2.4 Domestic Violence: Felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, committed by a person with whom the victim shares a child in common, committed by a person who is cohabitating with or has cohabitated with the victim as a spouse, committed by a person similarly situated to a spouse of the victim under the domestic or family violence laws of Illinois, or committed by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of Illinois. 42 U.S.C. §1437d(u)(3)(B), § 13925.
- 2.5 Immediate Family Member: A spouse, parent, brother or sister, or child of a victim or an individual to whom the victim stands *in loco parentis*; or any other person living in the household of the victim and related to the victim by blood or marriage. 42 U.S.C. § 1437d(u)(3)(D), § 13925.
- 2.6 Perpetrator: A person who commits an act of domestic violence, dating domestic violence or stalking against a victim.
- 2.7 Stalking: (a) to follow, pursue or repeatedly commit acts with the intent to kill, injure, harass or intimidate the victim; (b) to place under surveillance with the intent to kill, injure, harass or intimidate the victim; (c) in the course of, or as a result of such following, pursuit, surveillance, or repeatedly committed acts, to place the victim in reasonable fear of the death of, or serious bodily injury to the victim; or (d) to cause substantial emotional harm to the victim, a member of the immediate family of the victim or the spouse or intimate partner of the victim. 42 U.S.C. §1437d(u)(3)(C), § 13925.
- 2.8 Bona Fide Claim: A *bonafide* claim of domestic violence, dating violence or stalking must include incidents that meet the terms and conditions in the above definitions.
- 2.9 Victim: Is a person who is the victim of domestic violence, dating violence, or stalking under this Policy and who has timely and completely completed the certification under 3.2 and 3.3 or as requested by PCHA.

### 3.1 Certification and Confidentiality

#### 3.2 Failure to Provide Certification Under 3.2 and 3.3

The person claiming protection under VAWA shall provide complete and accurate certifications to PCHA, owner or manager within 14 business days after the party requests in writing that the person completes the certifications. If the person does not provide a complete and accurate certification within the 14 business days, PCHA, owner or manager may take action to deny or terminate participation or tenancy. 42 U.S.C. §14371 (5) & (6); 42 U.S.C. § 1437F(c)(9); 42 U.S.C. §1437f(d)(l)(B)(ii)&(iii); 42 U.S.C. §1437f(o)(7)(C) &(D); or 42 U.S.C. §1437f(o)(20) or for other good cause.

### 3.3 HUD Approved Certification

For each incident that a person is claiming as abuse, the person shall certify to PCHA, owner or manager their victim status by completing a HUD approved certification form. The person shall certify the date, time and description of the incidents, that the incidents are *bonafide* incidents of actual or threatened abuses and meet the requirements of VAWA and this Policy. The person shall provide information to identify the perpetrator including but not limited to the name and, if known, all alias names, date of birth, address, contact information such as postal, e-mail or internet address, telephone or facsimile number or other identification.

### 3.4 Confirmation of Certification

A person who is claiming victim status shall provide to PCHA, an owner or manager: (a) documentation signed by the victim and an employee, agent or volunteer of a victim service provider, an attorney, or a medical professional from whom the victim has sought assistance in addressing domestic violence, dating violence or stalking or the effects of the abuse, in which the professional attests under penalty of perjury (28 U.S.C. §1746) the professional's belief that the incident(s) in question are *bonafide* incidents of abuse; or (b) a federal, state, tribal, territorial, local police or court record.

### 3.4 Confidentiality

PCHA, the owner and managers shall keep all information provided to PCHA under this Section confidential. PCHA, owner and manager shall not enter the information into a shared database or provide to any related entity except to the extent that:

- (a) the victim request or consents to the disclosure in writing;
- (b) the disclosure is required for eviction from public housing under 42 U.S.C. §1437 1(5) & (6)(See Section 4 in this Policy)

## 4.0 Appropriate Basis for Denial of Admission, Assistance or Tenancy

4.1 PCHA shall not deny participation or admission to a program on the basis of a person's abuse status, if the person otherwise qualifies for admission of assistance.

4.2 An incident or incidents of actual or threatened domestic violence, dating violence, or stalking will not be a serious or repeated violation of the lease by the victim and shall not be good cause for denying to a victim admission to a program, terminating occupancy rights, or evicting a tenant.

- 4.3 Criminal activity directly related to domestic violence, dating violence, or stalking engaged in by a member of a tenant's household or any guest or other person under the tenant's control shall not be cause for termination of assistance, tenancy, or occupancy rights if the tenant or an immediate member of the tenant's family is the victim of that domestic violence, dating violence or stalking.
- 4.4 Notwithstanding Sections 4.1, 4.2, and 4.2, PCHA, an owner or manager may bifurcate a lease to evict, remove or terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others without evicting, removing, terminating assistance to or otherwise penalizing the victim of the violence who is also a tenant or lawful occupant. 42\_ U.S.C. §1437d(l)(6)(B)
- 4.5 Nothing in Sections 4.1, 4.2, and 4.3 shall limit the authority of PCHA, an owner or manager, when notified, to honor court orders addressing rights of access to or control of the property, including civil protection orders issued to protect the victim and issued to address the distribution or possession of property among the household members when the family breaks up.
- 4.6 Nothing in Sections 4.1, 4.2, and 4.3 limits PCHA, an owner or manager's authority to evict or terminate assistance to any tenant for any violation of lease not premised on the act or acts of violence against the tenant or a member of the tenant's household. However PCHA, owner or manager may not hold a victim to a more demanding standard.
- 4.7 Nothing in Sections 4.1, 4.2, and 4.3 limits PCHA, an owner or manager's authority to evict or terminate assistance, or deny admission to a program if the PCHA, owner or manager can show an actual and imminent threat to other tenants, neighbors, guests, their employees, persons providing service to the property or others if the tenant family is not evicted or terminated from assistance or denied admission.
- 4.8 Nothing in Sections 4.1, 4.2, or 4.3 limits PCHA, an owner or manager's authority to deny admission, terminate assistance or evict a person who engages in criminal acts including but not limited to acts of physical violence or stalking against family members or others.

#### 4.9 Actions Against a Perpetrator

The PCHA may evict, terminate assistance, deny admission to a program or trespass a perpetrator from its property under this Policy. The victim shall take action to control or prevent the domestic violence, dating violence, or stalking. The action may include but is not limited to: (a) obtaining and enforcing a restraining or no contact order or order for protection against the perpetrator; (b) obtaining and enforcing a trespass against the perpetrator; (c) enforcing PCHA or law enforcement's trespass of the perpetrator; (d) preventing the delivery of the perpetrator's mail to the victim's unit; (e) providing identifying information listed in 3.2; and (f) other reasonable measures.

#### 5.0 PCHA Right to Terminate Housing and Housing Assistance under this Policy

5.1 Nothing in this Policy will restrict the PCHA, owner or manager's right to terminate tenancy for lease violations by a resident who claims VAWA as a defense if it is determined by the PCHA, owner or manager that such a claim is false.

5.2 Nothing in this Policy will restrict the PCHA right to terminate tenancy if the victim tenant (a) allows a perpetrator to violate a court order relating to the act or acts of violence; or (b) if the victim tenant allows a perpetrator who has been barred from PCHA property to come onto PCHA property including but not limited to the victim's unit or any other area under their control; or (c) if the victim tenant fails to cooperate with an established safety strategy as designed by a local victim support service provider (see 7.2).

5.3 Nothing in this Policy will restrict the PCHA right to terminate housing and housing assistance if the victim tenant who claims as a defense to an eviction or termination action relating to domestic violence has engaged in fraud and abuse against a federal housing program; especially where such fraud and abuse can be shown to have existed before the claim of domestic violence was made. Such fraud and abuse includes but is not limited to unreported income and ongoing boarders and lodgers violations, or damage to property.

#### 6.1 Statements of Responsibility of Tenant Victim, the PCHA to the Victim, and to the Larger Community.

6.2 A tenant victim has no less duty and responsibility under the lease to meet and comply with the terms of the lease than any other tenant not making such a claim. Ultimately all tenants must be able to take personal responsibility for themselves and exercise control over their households in order to continue their housing and housing assistance. The PCHA will continue to issue lease violation notices to all residents who violate the lease including those who claim a defense of domestic violence.

- 6.3 PCHA recognizes the pathologic dynamic and cycle of domestic violence and a victim of domestic violence will be referred to local victim support service providers to help victims break the cycle of domestic violence through counseling, referral and development of a safety strategy.
- 6.3 A tenant victim must take personal responsibility for exercising control over their household by accepting assistance and complying with the safety strategy or plan to best of victim's ability and reason under the circumstances. Failure to do this may be seen as other good cause.
- 6.4 All damages including lock changes will be the responsibility of the tenant victim. This is in keeping with other agency policies governing tenant caused damages.

#### 7.0 Notice to Applicants, and Participants.

PCHA shall provide notice to applicants, participants, tenants, managers and owners of their rights and obligations under Section 3.4 Confidentiality and Section 4.0 Appropriate Basis for Denial of Admission, Assistance or Tenancy.

7:1 If the PCHA, owner or manager knows that an applicant to or participant in a PCHA housing program is the victim of dating violence, domestic violence or stalking, the PCHA, owner or manager shall inform that person of this Policy and the person's rights under it.

#### 8.0 Reporting Requirements

PCHA shall include in its 5-year plan a statement of goals, objectives, policies or programs that will serve the needs of victims. PCHA shall also include a description of activities, services or programs provided or offered either directly or in partnership with other service providers to victims, to help victims obtain or maintain housing or to prevent the abuse or to enhance the safety of victims.

#### 9.0 Conflict and Scope

This Policy does not enlarge PCHA's duty under any law, regulation or ordinance: If this Policy conflicts with the applicable law, regulation or ordinance, the law, regulation or ordinance shall control. If this Policy conflicts with another PCHA policy such as its Statement of Policies, this Policy will control.

#### 10.0 Amendment

The Executive Director may amend this policy when it is reasonably necessary to effectuate the Policy's intent, purpose or interpretation. The proposed amendment along with the rationale for the amendment shall be submitted to the Executive Director for consideration. Where reasonably necessary, the Executive Director may approve the amendment. The amendment shall be effective and incorporated on the date that the Executive Director signs the amendment.

## Chris Bruns

---

**From:** Chris Bruns  
**Sent:** Thursday, October 22, 2015 4:36 PM  
**To:** DiPietro, Steven  
**Cc:** Chris Bruns  
**Subject:** RE: FY2015 PHA Plan

Hi Steven,

Not a problem on the oversight.

- 1) PCHA refers assisted families who have been subject to domestic violence, dating violence, sexual assault, or stalking to the local Quanada office. Quanada offers emotional, physical, and crisis support to those who have been assaulted or abused.
- 2) PCHA receives housing referrals from both the local Quanada office and Victim/Witness Office with the local government to promote adequate and affordable housing, economic opportunity, and a suitable living environment free from discrimination to those who have been the subject of domestic violence, dating violence, sexual assault, or stalking.
- 3) PCHA partners with the local Quanada office to offer prevention education to assisted families that is free and age appropriate.

Topics include, but are not limited to;

- Self esteem
- Peer pressure
- Internet/texting safety
- Stress/anger management
- Bullying
- Drug facilitated sexual assault
- Healthy relationships/dating violence
- Sexual harassment
- Sexual abuse prevention
- Sexual pressure
- LGBTQ issues
- Dealing with abuse

Please let me know if you need anything further.

Thank you,

Chris Bruns  
Executive Director  
(E) [Cbruns@pikehousing.com](mailto:Cbruns@pikehousing.com)  
(T) 217-335-2616  
(F) 217-335-2406  
[www.pikehousing.com](http://www.pikehousing.com)



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**From:** DiPietro, Steven [mailto:Steven.DiPietro@hud.gov]  
**Sent:** Thursday, October 22, 2015 2:58 PM  
**To:** Chris Bruns <cbruns@pikehousing.com>  
**Subject:** FY2015 PHA Plan

Hi Chris,

This was an oversight on my part in not following up with you regarding the additional documentation you supplied. The info for VAWA is insufficient. You only indicated that it has not changed. However Section 603 of VAWA 2005 amends section 5A of the U.S. Housing Act of 1937. This amendment requires the 5-year plans of PHAs to begin including a statement about goals, activities, objectives, policies, or programs that will enable a PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. **The amendment requires the annual plan of PHAs to include a description of: (1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; (2) any activities, services, or programs provided or offered that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking to obtain or maintain housing; and (3) any activities, services, or programs provided or offered to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families.**

Please provide me with this information so that I may add it to your Plan.

Thanks

