

CHAPTER 9. INDICATOR #8, SECURITY

9-1 GENERAL. This indicator examines a PHA's performance in tracking crime-related problems (i.e., statistics on Part I and part II crimes based on the FBI's Uniform Crime Reporting (UCR) system) in its developments, reporting incidents of crime to local law enforcement agencies, the adoption and implementation of tough applicant screening and resident eviction policies and procedures, and, as applicable, PHA performance under any HUD drug prevention or crime reduction grant(s).

- A. If applicable, this indicator examines PHA performance under any special drug prevention or crime-related grants relating to security administered by the PHA. PHAs can receive credit for performance under non-HUD funded programs if they choose to be assessed for these programs.
- B. PHAs with fewer than 250 units will not be assessed under this indicator unless they request to be assessed at the time of the PHMAP certification submission. If not so requested, the State/Area Office will exclude this indicator from the PHA's assessment.

9-2 COMPONENT #1, TRACKING AND REPORTING CRIME-RELATED PROBLEMS. This component examines a PHA's performance in tracking crime and crime-related problems (Part I and Part II crimes based on the FBI's UCR system) in its developments, identifies the reporting of incidents of crime to local police authorities, and if applicable, shows whether a PHA has a cooperative system with local police authorities for tracking incidents of crime.

- A. Verification of component #1, tracking and reporting crime and crime-related problems.
 - 1. Board Resolution. The first item to verify for this component is that the Board of Commissioners has passed a resolution that requires the PHA administration to track crime and crime-related problems and reports incidents of crime to local police authorities. In order to score a grade of A for this component, the Board resolution should also require the PHA to maintain a system for cooperating with local police authorities in tracking crime and crime-related problems.

- 2. The reviewer should verify that the Board resolution directs the PHA administration to track crime and crime-related problems and report incidents of crime to local police, and, if

applicable, to maintain a system for cooperating with local police authorities in tracking crime and crime-related problems.

3. The reviewer should verify that the Board resolution was in effect for the FY being assessed.
 4. The minutes of the Board meeting at which the resolution was adopted should be examined to verify that the Board passed the subject resolution.
 5. If Board minutes do not contain reference to the passage of a Board resolution, or if the resolution was not in effect during the FY being assessed, the PHA will fail this component.
- B. Verification of the implementation of component #1, tracking and reporting crime and crime-related problems. The most important element in this component is the implementation of the actions called for in the Board resolution. To verify the level and the effectiveness of the implementation, the PHA must be able to produce credible documentation that demonstrates the following:
1. The PHA is tracking incidents of crime in its developments;
 2. The PHA is reporting criminal activity to the local police authorities; and
 3. If applicable, the PHA is cooperating with the local police authorities in tracking crime and crime-related problems.
- C. Documentation for component #1, tracking and reporting of crime and crime-related problems.
1. Tracking crime and crime-related problems in the developments. The PHA must be able to evidence in writing that it is tracking crime and crime-related problems by development. Documentation may include, but is not limited to:
 - a. Police incident reports by development;
 - b. Crime statistics by development;
 - c. Listings of police service calls by development; and
 - d. Listings of criminal activity or crime-related

problems identified by site management.

2. Reporting of criminal activity to local police authorities. A PHA must be able to document that it is reporting criminal activity to local police authorities. Examples of some of the types of documentation include, but are not limited to:
 - a. Information (statistical reports) from local police authorities on crimes reported by the PHA;
 - b. PHA policies that encourage/require PHA employees to report crime and crime-related problems, or suspected crime and crime-related problems to local police authorities, and records to indicate that PHA employees are reporting crime and crime-related problems or suspected crime and crime-related problems to local police authorities;
 - c. Copies of communications from the PHA to local police authorities concerning criminal activity on PHA property;
 - d. Copies of PHA communications to residents encouraging the reporting of crime and crime-related problems; and
 - e. PHA developments that, upon one or more random inspections by the reviewer, are free of visible criminal activity, such as drug dealing, vandalism and graffiti.
3. Cooperating with the local police authorities in tracking crime and crime-related problems. The local police authority should be contacted and requested to provide any information relevant to assessing the extent of PHA/local police authority cooperation, as well as interviews conducted with PHA personnel. The PHA must substantiate a cooperative system or method with the local

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police authority for tracking crime and crime-related problems to improve law enforcement and crime prevention. Examples of documented cooperation may include, but are not limited to:

- a. Units deprogrammed for use as police substations;
- b. Periodic and regular meetings between the local police authority and PHA management;

- c. Provision of access by the local police authority to vacant units in order to facilitate surveillance and pursuit;
- d. Provision of community space for police/community meetings.
- e. Police input into the development and implementation of drug elimination grants;
- f. Police input into modernization planning;
- g. Operation Safe Home and other Federal/local law enforcement efforts;
- h. Gun and drug sweeps;
- i. Youth counseling;
- j. Youth recreational activities;
- k. Tenant security training;
- l. Community policing;
- m. Designating target-free drug zones;
- n. Security surveys;
- o. Sting operations;
- p. Cooperation in PHA lease enforcement efforts;
- q. Police residency in public housing; and
- r. If the PHA employs its own security guards (in-house or contracted), the PHA can furnish written information regarding a cooperative system with the local police

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authority on tracking and reporting crime and crime-related problems. The PHA can provide evidence of cooperative activities, such as joint projects and operations, screening and training of PHA guards, etc.

- D. Calculation of component #1, tracking and reporting crime and crime-related problems.
 - 1. This component, for the Anywhere PHA with a FYE of March 31, 1997, is calculated by dividing the total number of developments where crime and crime-related problems are tracked by the PHA, by

the total number of the PHA's developments, as follows:

Calculation of Component #1, Tracking Crime and Crime-Related Problems

Board Resolution

Date of Board resolutions where policies and procedures were adopted to track crime and crime-related problems, to implement a cooperative system with local police authorities, and report incidents of crime to local police authorities were adopted: 02/08/97

Date of minutes of Board meeting where the subject Board resolution was passed: 02/08/97

Has the PHA implemented a cooperative system with local police authorities for tracking and reporting incidents of crime? Y ___ N XX

Implementation of Procedures

Total number of developments: 3

Development	Date of Implementation
First Street	03/12/97
Second Street	02/15/97
Third Street	02/22/97

Total number of developments where procedures were implemented to track and report crime: 3

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Calculation of Component #1, Tracking Crime and Crime-Related Problems

Tracking of Crime and Crime-Related Problems

Number of police incident reports by development:

First Street	3
Second Street	6
Third Street	5

Crime statistics by development:

First Street	Y XX N ___
Second Street	Y XX N ___
Third Street	Y XX N ___

Listings of police service calls by development:

First Street	4
Second Street	2
Third Street	1

Listings of criminal activity or crime-related problems (Parts I and II crimes based on the FBI's UCR system) identified by site management:

Development and Activity	Date
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First Street	
Sale of drugs	03/13/97
Gang activity	03/13/97
Unit break-in	03/15/97
Assault on resident	03/19/97
Purchase of drugs	03/26/97
Graffiti	03/14/97

Second Street	
Sale of drugs	02/28/97
Purchase of drugs	02/28/97
Vandalism	03/14/97

Third Street	
Attempted unit break-in	03/25/97
Graffiti	03/26/97

Reporting of Criminal Activity to Local Police Authorities

Does the PHA receive statistical reports from local police authorities on crimes reported by the PHA? Y ___ N XX

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Calculation of Component #1, Tracking Crime and Crime-Related Problems

Reporting of Criminal Activity to Local Police Authorities, Continued

Does the PHA have a policy that encourages/require PHA employees to report crime and crime-related problems, or suspected crime and crime-related problems to local police authorities? Y XX

N ___

Date of policy: 02/08/97

Does the PHA maintain records to indicate that PHA employees are reporting crime and crime-related problems or suspected crime and crime-related problems to local police authorities? Y XX

N ___

Does the PHA maintain copies of communications from the PHA to local police authorities concerning criminal activity on PHA property? Y XX
N __

Does the PHA maintain copies of communications to residents encouraging the reporting of crime and crime-related problems? Y XX
N __

Random inspections of developments:

First Street

Drug dealing evident? Y __
N XX
Vandalism-evident? Y XX
N __
Graffiti evident? Y __
N XX

Second Street

Drug dealing evident? Y __
N XX
Vandalism evident? Y __
N XX
Graffiti evident? Y __
N XX

Third Street

Drug dealing evident? Y __ N
XX
Vandalism evident? Y __ N
XX
Graffiti evident? Y __ N
XX

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Calculation of Component #1, Tracking Crime and Crime-Related Problems

Cooperating with the Local Police Authorities in Tracking Crime and Crime-Related Problems

Number of units deprogrammed for use as police substations: _____
N/AX

Number of periodic and regular meeting between local police authorities and PHA management: _____
N/AX

Number of cases where the PHA provided access to local police authorities to vacant units in

order to facilitate surveillance and pursuit: _____
N/AX

Number of cases where the PHA provided community
space for police/community meetings: _____
N/AX

Do the local police authorities provide input
into the development and implementation of
drug elimination grants? Y__
N__ N/AX

Do the local police authorities provide input
into modernization planning? Y__
N__ N/AX

Does the PHA/local police authorities cooperate
in Operation Safe Home and other Federal/local
law enforcement efforts? Y__
N__ N/AX

Does the PHA/local police authorities cooperate
in gun and drug sweeps? Y__
N__ N/AX

Does the PHA/local police authorities cooperate
in the provision of youth counseling? Y__
N__ N/AX

Does the PHA/local police authorities cooperate
in the provision of youth recreational
activities? Y__
N__ N/AX

Does the PHA/local police authorities cooperate
in the provision of tenant security training? Y__
N__ N/AX

Does the PHA/local police authorities cooperate
in the provision of community policing? Y__
N__ N/AX

Does the PHA/local police authorities cooperate
in designating target-free drug zones? Y__
N__ N/AX

Calculation of Component #1, Tracking crime
and Crime-Related Problems

Cooperating with the Local Police Authorities in
Tracking Crime and Crime-Related Problems, Continued

Does the PHA/local police authorities cooperate
in conducting security surveys? Y__

N__ N/AX

Does the PHA/local police authorities cooperate in conducting sting operations? Y__

N__ N/AX

Does the PHA/local police authorities cooperate cooperate in PHA lease enforcement efforts? Y__

N__ N/AX

Does the PHA/local police authorities cooperate in the provision of police residency in public housing? Y__

N__ N/AX

Does the PHA employs its own security guards (in-house or contracted)? Y__ N

XX

If so, do the PHA guards work in close cooperation with local police authorities? Y__

N__ N/AX

Number of joint projects and operations: _____

N/AX

Do local police authorities screen PHA guard applicants? Y__

N__ N/AX

Do local police authorities train PHA guards? Y__

N__ N/AX

Calculation of the Percentage of Developments Where the PHA Tracks Crime and Crime-Related Problems

3 total # of developments problems tracked = 100% of PHA
3 total # of PHA developments developments

- 2. In this example, the Anywhere PHA would score a grade of C for this component since it has Board policies and has implemented procedures, and can document that it tracks crime and crime-related problems in at least 60 percent of its developments, and it reports incidents of crime to local police authorities, but it does not have a cooperative system for tracking and reporting incidents of crime to local police authorities.

9-3 COMPONENT #2. SCREENING OF APPLICANTS. This component examines whether a PHA Board has adopted and implemented procedures, and can document that it successfully screens

out and denies admission to specific applicants.

A. Verification of component #2, screening of applicants.

1. Board Resolution. The first item to verify is documentation of the passage by the PHA Board of commissioners of a resolution adopting an admissions policy that requires the PHA to deny admission to a public housing applicant who:
 - a. Has a recent history of criminal activity involving crimes to persons or property and/or other criminal acts that would adversely affect the health, safety or welfare of other residents or PHA personnel;
 - b. Was evicted, because of drug-related criminal activity, from housing assisted under the U.S. Housing Act of 1937, for a minimum of a three year period beginning on the date of such eviction, unless the applicant has successfully completed, since the eviction, a rehabilitation program approved by the PHA;
 - c. The PHA has reasonable cause to believe is illegally using a controlled substance; or
 - d. The PHA has reasonable cause to believe abuses alcohol in a way that causes behavior that may interfere with the health, safety, or right to peaceful enjoyment of the premises by other residents or PHA personnel.
2. There may exist more than one Board resolution pertaining to the screening of applicants. However, the cumulative resolutions shall embody the screening criteria as cited. For example, one resolution may adopt the criteria stated, above, and direct the PHA administration to revise the current admissions policy; and another resolution may adopt the revised admissions policy.

B. Documentation of the implementation of component #2, screening of applicants. The most important elements in this component are

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the implementation of the screening actions called for in the PHA's resolution and in the admissions policy; and in the documentation of the results of the implementation. The PHA must be able to produce credible documentation that it is screening applicants in accordance with the PHA's official policy.

1. Review the contents of the admissions policy

adopted by the Board to ensure that it contains, at minimum, screening criteria that contains the four criteria cited.

2. The reviewer should verify that the Board resolution was in effect for the FY being assessed.
 3. The minutes of the Board meeting at which the resolution was adopted should be examined to verify that the Board passed the subject resolution.
 4. If Board minutes do not contain reference to the passage of a Board resolution, or if the resolution was not in effect during the FY being assessed, the PHA will fail this component.
- C. Verification of component #2, screening of applicants. Examples of credible documentation to verify this component may include, but are not limited to:
1. Written amendments and notices of changes to the PHA's policies regarding admissions.
 2. The PHA application that includes questions appropriate to the four criteria cited; and
 3. Applicant files which include evidence that applicants were successfully screened for the four criteria cited. Appropriate evidence includes, but is not limited to:
 - a. Requests for police records and the results of the requests;
 - b. Interviews with previous landlords and/or neighbors, and documentation on outcomes of these interviews;
 - c. Home visits and documentation on the results of such visits;
 - d. Credit checks and the results; and
 - e. Check lists in applicant files that show the various dates for appropriate screening milestones.
 4. Review PHA internal reports from the occupancy division that show the number of applications received, approved, rejected, etc.

- D. Documentation of successful results of the screening of applicants. The desired result from the implementation of this component is that fewer residents who present a security threat to other residents and PHA personnel are admitted for occupancy. In order to document that the PHA appropriately screens out applicants who meet the four criteria cited, the reviewer should review a valid sampling of applicant files to determine that:
1. Police record checks are being made. Applicant files should contain results of the police record check;
 2. Home visits are being completed. Applicant files should contain results of the home visits;
 3. Letters of rejection are being sent to applicants who meet any of the four screening criteria cited.
 4. Reviewers should also interview:
 - a. Site managers to get their impressions on whether applicants are being appropriately screened according to the four criteria cited;
 - b. Local police authority representatives to verify that the PHA is screening according to the four criteria cited; and
 - c. Resident leaders to get their impressions of the PHA's applicant screening process, as well as resident involvement and participation in the PHA's applicant screening process, if applicable.
- E. Calculation of component #2, screening of applicants.

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1. This component, for the Anywhere PHA with a FYE of March 31, 1997, is calculated as follows:

Calculation of Component #2, screening of Applicants

Board Resolution

Date of Board resolutions where policies and procedures were adopted to screen out and deny admission to public housing applicants who:

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Have a recent history of criminal activity;
 Was evicted, because of drug-related criminal activity;
 The PHA has reasonable cause to believe is

illegally using a controlled substance; or
The PHA has reasonable cause to believe
abuses alcohol.

Date of minutes of Board meeting where the
subject Board resolution was passed: 02/08/97

Successful Screening of Applicants

Does the PHA application include questions
appropriate to the four criteria cited? Y XX
N ___

Do applicant files include:

Requests for police records and the results
of the requests? Y XX
N ___

Interviews with previous landlords/neigh-
bors, and results of interviews? Y XX
N ___

Home visits and documentation on results? Y XX
N ___

Credit checks and the results? Y XX
N ___

Check lists with dates of screening
milestones? Y XX
N ___

Results of the police record check? Y XX
N ___

Record of home visits and results? Y XX
N ___

Rejection letters to applicants who meet
any of the four criteria cited? Y XX
N ___

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Calculation of Component #2, Screening of Applicants

Successful Screening of Applicants, Continued

Interviews and results to determine if applicants
are screened according to the criteria cited.

Site managers: Y XX N ___

Local police authority representatives: Y ___ N ___
N/AX

Resident leaders:

Y XX N ___

Review of occupancy internal reports.

Number of applications received:	278
Number of applications approved:	112
Number of applications rejected:	123
Number of applications withdrawn:	16
Number of applicants that did not follow-up:	27

2. In this example, the Anywhere PHA would score a grade of A for this component since it has Board adopted and implement policy and procedures that successfully screens out and denies admission to applicants who meet the four criteria cited.

9-4 COMPONENT #3, LEASE ENFORCEMENT. This component examines whether PHA Board has adopted and implemented procedures, and can document that it appropriately evicts public housing residents on the basis of a reasonable cause.

A. Verification of component #3, lease enforcement.

1. Board Resolution. The first item to verify is documentation of the passage by the PHA Board of Commissioners of a resolution adopting occupancy policies that 'require the PHA administration to evict any lease holder and/or family members or other occupants of the lease holder's household who:

- a. The PHA has reasonable cause to believe engages in any criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises by other residents or PHA personnel;

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- b. The PHA has reasonable cause to believe engages in any drug-related criminal activity (as defined at section 6(1) of the 1937 Housing Act (42 U.S.C. 1437d(1)) on or off the PHA's property; or

- c. The PHA has reasonable cause to believe abuses alcohol in such a way that causes behavior that may interfere with the health, safety or right to peaceful enjoyment of the premises by other residents or PHA personnel.

2. There may exist more than one Board resolution

pertaining to the eviction of residents. However, the cumulative resolutions shall embody the lease enforcement criteria as cited. For example, one resolution may adopt the criteria stated, above, and direct the PHA administration to revise the current occupancy policy; another resolution may adopt the revised occupancy policy; and a third resolution may adopt a new lease that embodies the lease enforcement criteria as cited.

B. Documentation of the implementation of component #3, lease enforcement. The most important elements in this component are the implementation of the lease enforcement actions called for in the PHA's resolution and in the occupancy policy; and in the documentation of the results of the implementation. The PHA must be able to produce credible documentation that it evicts residents in accordance with the PHA's official policy.

1. Review the contents of the occupancy policy adopted by the Board to ensure that it contains, at minimum, eviction criteria that contains the three criteria cited.
2. The reviewer should verify that the Board resolution was in effect for the FY being assessed.
3. The minutes of the Board meeting at which the resolution was adopted should be examined to verify that the Board passed the subject resolution.

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4. If Board minutes do not contain reference to the passage of a Board resolution, or if the resolution was not in effect during the FY being assessed, the PHA will fail this component.

C. Verification of component #3, lease enforcement. The most important items to verify are the implementation of the eviction policy articulated in the resolution and the documentation of the results of the implementation. The PHA must be able to produce credible documentation that it is enforcing the lease in accordance with the official policy. Examples of credible documentation to verify this component include, but are not limited to:

1. Written amendments and notices of changes to the lease and/or PHA policies regarding lease enforcement.
2. Copies of eviction notices sent to lease holders

in violation of the three criteria cited;

3. Copies of court judgements based upon cases brought for the three criteria cited;
4. Warning letters issued to residents; and
5. Periodic reports to the Board of Commissioners listing for-cause evictions.
6. Review PHA internal reports from the occupancy division that show the number of lease enforcement actions initiated for the three criteria cited, the number of successful evictions under the three criteria cited, etc.

D. Documentation of successful results of lease enforcement. The desired result from the implementation of this component is that fewer residents who present a security threat to other residents and PHA personnel remain in occupancy. In order to document that the PHA appropriately evicts residents who meet the three criteria cited, the reviewer should review a valid sampling of resident files to determine that:

1. Police record checks are being made. Resident files should contain results of the police record check.
2. Home visits are being completed. Resident files should contain results of the home visits.

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3. Notices of eviction are being sent to residents who meet any of the three criteria cited.
4. Check lists in applicant files that show the various dates for appropriate lease enforcement milestones.
5. Reviewers should also interview:
 - a. Site managers to get their impressions on whether resident are being appropriately evicted according to the three criteria cited;
 - b. Local police authority representatives to verify that the PHA is evicting residents according to the three criteria cited; and
 - c. Resident leaders to get their impressions of the PHA's eviction policy/procedures.

E. Calculation of component #3, lease enforcement.

1. This component, for the Anywhere PHA with a FYE of March 31, 1997, is calculated as follows:

Calculation of Component #3, Lease Enforcement

Board Resolution

Date of Board resolutions where policies and procedures were adopted to evict residents who: 02/08/97

Engages in criminal activity;
Engages in drug-related criminal activity; or
The PHA has reasonable cause to believe
abuses alcohol.

Date of minutes of Board meeting where the subject Board resolution was passed:
02/08/97

Appropriate Lease Enforcement

Do applicant files include:

Requests for police records and the results of the requests? Y XX N ___

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Calculation of component #3, Lease Enforcement

Appropriate Lease Enforcement, Continued

Copies of eviction notices sent to lease holders in violation of the three criteria cited? Y XX N ___

Copies of court judgements based upon cases brought for the three criteria cited? Y XX N ___

Warning letters issued to residents? Y XX N ___

Check lists with eviction milestones? Y XX N ___

Results of the police record check? Y XX N ___

Record of home visits and results? Y XX N ___

Interviews and results to determine if residents

are evicted according to the criteria cited.

Site managers:	Y XX
N ___	
Local police authority representatives:	Y ___
N___ N/AX	
Resident leaders;	Y XX
N ___	

Review of occupancy internal reports.

Number evictions initiated by the PHA:	278
Number of successful evictions:	112
Number of residents that gave notice prior to eviction:	123
Number of residents that abandoned property:	16

Does the PHA issue periodic reports to the Board of Commissioners listing for-cause evictions?	Y XX
N ___	

2. In this example, the Anywhere PHA would score a grade of A for this component since it has Board adopted and implement policy and procedures that result in the eviction of residents who meet the three criteria cited.

9-5 COMPONENT #4. GRANT PROGRAM GOALS. This component examines a PHA's management of HUD funded drug prevention or crime reduction

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programs, such as the Public Housing Drug Elimination Program (PHDEP), etc. Also, PHAs can receive credit for implementation of programs through partnerships with non-PHA providers, even if the programs are not funded by HUD or the PHA, if they choose to be assessed for them. A PHA must select either to be assessed for all or none of the non-HUD funded programs. If a PHA does not have any HUD funded programs, and the PHA does not have or chooses not to be assessed under non-HUD funded programs, the State/Area Office will exclude this component from the PHA's assessment.

A. Prior to the on-site confirmatory review, the reviewer should identify all the applicable programs for which the PHA has HUD funding to implement. The reviewer should also identify from the PHA's PHMAP certification if the PHA elected to be assessed for non-HUD funded programs. Only grant programs which were open at any

time during the assessed fiscal year are measured under this component.

- B. Verification of component #4, grant program goals.
 - 1. In order to confirm the validity of a PHA's certification for this component, the reviewer will have to compare actual progress to the most recent implementation plan for each of the PHA's drug prevention or crime reduction programs.
 - 2. The reviewer should assemble an accurate count of the number of goals for each program in question and then an accurate count of each goal met and degree of accomplishment in order to calculate the percentage of goals accomplished.

- C. Documentation of the implementation of grant program goals. For each goal contained in the implementation plan for which the PHA claims accomplishment, the PHA would be required to provide documentation that indicates the degree to which the goal was met.
 - 1. For example, if under the PHDEP, the PHA claimed that it had met its goal of holding teen drug prevention classes, the PHA would have to provide documentation/records that verify the classes had actually been held.
 - 2. This verification shall establish that people actually attended the classes, as opposed to announcements that the classes were scheduled to be held.

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- D. Calculation of component #4, grant program goals.
 - 1. This component measures the percentage of goals met under the implementation plan(s) for drug prevention or crime reduction programs. Even though the timely expenditure and processing of budgetary resources may not be a goal(s), the reviewer should examine these areas and provide technical assistance to a PHA, as warranted. The reviewer should determine the following:
 - a. Total number of goals included in all the implementation plan(s) for the FY being assessed; and
 - b. Total number of goals met in the FY being assessed;
 - 2. The reviewer should examine the documentation to

ensure that goals were actually accomplished as claimed by the PHA. It is not sufficient to simply review a statistical report. Interviews should be held with resident leaders and program participants.

3. To calculate the percentage of goals met, divide the total number of goals met by the total number of goals included in all the implementation plans.
4. For example, the Anywhere PHA has a total of 36 goals, with 31 of those goals met in the FY being assessed, as follows:

Calculation of Component #4, Grant Program Goals

31 total number of goals met by the PHA = 86% goals met
36 total number of goals included in
the implementation plan(s)

5. In this example, the Anywhere PHA would score a grade of C for this component since at least 60 percent of the goals were met under the implementation plan for any/all of these programs.