



MOVING TO WORK

FY2012

ANNUAL PLAN

MOVING TO WORK FY2012 ANNUAL PLAN

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1.0 INTRODUCTION

This document serves as the Delaware State Housing Authority's (DSHA) *Moving To Work* (MTW) Annual Plan for FY2012, which starts July 1, 2011 and ends June 30, 2012. On April 8, 2008, DSHA adopted and signed an Amended and Restated MTW Agreement with the U.S. Department of Housing and Urban Development (HUD) that extended the program until June 30, 2018. This is a standardized agreement that HUD presented to all MTW agencies and allows DSHA to continue all current initiatives and retain the present funding allocation of the existing contract.

1.1 PROGRAMS COVERED IN THE MTW DEMONSTRATION AND INCLUDED IN THIS PLAN

The DSHA MTW Demonstration includes the following programs:

- A. Low Rent Public Housing
- B. Housing Choice Vouchers
- C. Capital Fund Program
- D. Resident Homeownership Program

1.2 OVERVIEW AND GOALS OF MTW PROGRAM

The three statutory objectives of the MTW Program continues to be A) to reduce costs and achieve greater cost effectiveness; B) to give incentives to families to obtain employment and become economically self sufficient; and C) to increase housing choices for low-income families. Due to the cycle of the waiting list and preferences, DSHA's goal is to serve up to 500 families each year in the program. During the last four (4) years, there has been an increase in the number of MTW exempt families, elderly and disabled, especially in the Housing Choice Voucher Program. DSHA instituted changes to the resident selection process to help increase the total number of MTW participants during FY2011. This includes limiting MTW exempt applicants to the first type of housing assistance available and applying time limits to market rent residents.

In the FY2012 MTW Annual Plan, DSHA has expanded the MTW program from a five (5) year term limit and a Safety-Net Program, to a seven (7) year term limit, with two separate tiers of participants. During the initial five (5) years of the program, residents will participate under MTW Tier I. Tier I participants will receive case management services with an emphasis on overcoming barriers to self-sufficiency, education, financial literacy, and increasing their potential earning income and employability. During the final two (2) years of the program, residents will be under MTW Tier II. Tier II participants will continue to receive case management services, but with an emphasis on job placement and retention and becoming ready to move out of subsidized housing by year seven (7). A Hardship Panel will be utilized to review cases that request housing assistance beyond year seven (7) due to extenuating circumstances.

The goals and objectives under the DSHA MTW Program are outlined as follows:

- A. To reduce costs and achieve greater cost effectiveness by administrative reforms to the Public Housing (PH) and Housing Choice Voucher Programs as indicated below:
 - 1. Combine the waiting lists for PH and Housing Choice Voucher Program with preferences consistent between the two programs.
 - 2. Increase the residents' share of the total tenant payment to 35% of adjusted gross income.
 - 3. Time-limit housing assistance for MTW participants.
 - 4. During the actual time a family is housed, it may not apply for an alternative form of subsidy.
 - 5. Enhance the quality of life and standard of living for residents participating in MTW by assisting residents in the removal of barriers to self-sufficiency (obtain drivers license, purchase vehicle, coordinate child care).
 - 6. Increase earned income of participating families enabling them to pay more towards their rent and requiring less subsidy.

- B. To give incentives to families who are employed or seeking employment and self-sufficiency with the following initiatives:
 - 1. Amend waiting list preferences to include working families.
 - 2. To make work pay, cap rent, with all funds over the cap up to the 35% limit placed in a savings account for the MTW participant.
 - 3. All MTW participants continuously participate in case management and are offered services and/or resource referrals including job training and placement services, computer experience, educational opportunities and transportation stipends, as funds allow.

- C. To improve housing choices for our residents by offering or coordinating the following resources:
 - 1. Homeownership counseling and assistance.
 - 2. Budget counseling.
 - 3. Fair Market Housing counseling.

4. Assistance obtaining a Low Income Housing Tax Credit Unit.
5. MTW Savings Account as income increases.
6. Counseling to repair credit problems.
7. Financial Literacy Education.
8. Individual Development Account referral for approved participants.
9. Resident Homeownership Program.

1.3 STATUS OF MTW PROGRAM AND ACCOMPLISHMENTS TO DATE

The accomplishments and status are cumulative from the date that the MTW Program started.

- A. Holly Square added to the PH stock on March 1, 2000.
- B. Certificate and Voucher Programs were combined into one Housing Choice Voucher Program.
- C. Rents were increased to 35% of adjusted income for all MTW participants.
- D. PH and Housing Choice Voucher Program waiting lists were combined.
- E. Working preference added.
- F. Case management services were established and contracts signed with two nonprofit counseling agencies for all Housing Choice Voucher Program MTW participants. All PH residents are assigned DSHA case managers at the time they enter the Program. Effective July 1, 2008 all case management has been done by DSHA Resident Service Staff.
- G. Report established to identify and monitor needs of the MTW participants.
- H. Agencies have been identified and contacts established that may provide services for unmet needs.
- I. All funds are block granted.
- J. MTW participants continue to be evaluated as they enter the program, and DSHA constantly networks with potential service providers and organizations to bring needed services to the participants and/or refer participants to services.
- K. An Individual Development Account (IDA) Program has been implemented and completed in September 2006 to help qualified MTW participants develop assets.

Thirty-six families completed their goals with 28 buying homes, five opening a business and three pursuing educational goals. The IDA program is now available from several outside organizations.

- L. The Resident Homeownership Program (RHP) began accepting applications in FY-2004. The RHP was revised in FY2011 to create a more realistic program and better prepare new participants to assume full homeownership responsibilities in seven (7) years. There are four families now participating in the program.
- M. Although DSHA's contract with NCALL has ended, we continue to provide referrals for credit repair, budget counseling, fair market housing counseling and RHP homeownership counseling for PH MTW participants. The contract was completed in 2006 and services are available through local non-profit organizations.
- N. DSHA completed an automated MTW case management system which tracks all statistical information for both PH and Housing Choice Voucher Program MTW participants. This system also includes an automated list that ensures timely compliance with quarterly reviews and completion of annual Resident Action Plans (RAP).
- O. DSHA amended the RAP to include a certification by MTW participants that they understand the requirement that they must be employed at least 20 hours per week earning no less than minimum wage, or in a training or educational program for at least 20 hours per week. (For residents moving in on or after July 1, 2007, requirements will be increased to 25 hours per week beginning with their third year in the MTW program and 30 hours per week for the fourth and any subsequent years in the MTW program.)
- P. DSHA has awarded 152 educational scholarships from the MTW budget.
- Q. DSHA purchased an Adult Basic Education/GED computer program for each of its PH sites to assist residents working toward educational goals.
- R. Since MTW implementation in August 1999, 607 families have successfully completed the MTW Program. One hundred and eighty-seven (187) have purchased homes and 420 have either begun paying the full rent at their current unit or moved to another unit and paid the full rent. Though some of those families would undoubtedly have been successful without MTW, we feel that the majority became successful by taking advantage of the counseling and social services made available through the program as well as the savings they accumulated while in the program. (See Tables 1 & 2)
- S. DHS A created a time limit safety-net feature in FY2005. This was for families who have **not** been able to increase their incomes to the level where 40% of their monthly adjusted income equals or exceeds the lower of their Housing Choice Voucher Program gross rent or Voucher payment standard, or the fair market rent for their PH unit, are being transferred to safety-net status. Their total tenant

payment would revert to 30% and they forfeited the money in their MTW savings account. The condition for the family to retain the rental subsidy is that they must maintain employment of at least 20 hours per week, be involved in a full-time educational program or a combination of both which equals at least 20 hours.

Families whose monthly-adjusted incomes are at or above the safety-net threshold are having their subsidy terminated. Housing Choice Voucher Program families will begin paying the full market rent to their current landlord, while Public Housing families are required to move out of the subsidized unit. All families who have remained in compliance with MTW requirements will be given the money in their savings accounts at this time.

- T. Funds from the Housing Choice Voucher Program Reserves were used to provide security fencing at two of the PH sites. After discussions with local police, it was determined that fencing along the side and rear perimeters of the sites would be the most effective and efficient way to assist city police to control and deter crime at those two sites and include cameras at Clarks Corner, Liberty Court, and Burton Village.

TABLE 1

**Moving to Work Savings
Numbers as of February 1, 2011**

Program	Current Participants	Total MTW Savings Accounts	Average MTW Savings Balance	Average Monthly Contribution
Public Housing	206	161	\$2,891.72	\$179.00
Housing Choice Vouchers	99	94	\$3,083.02	\$201.00
Total	305	255	\$2,987.37	\$190.00

TABLE 2

**Moving to Work Successful Move-outs
Numbers from 8/1/99 through 1/31/11**

Program	Homeownership	Unsubsidized Rental
Public Housing	102	193
Housing Choice Vouchers	85	227
Total	187	420

1.4 OBJECTIVES/ACTIVITIES PLANNED FOR THE CURRENT YEAR

The thirteenth-year Plan will concentrate on the following items:

- A. DSHA will increase the time limit for the MTW program from five (5) to seven (7) years, with the elimination of the Safety-Net program. Under the revised program, there will be two (2) tiers of participation. MTW Tier I will be for the initial five (5) years and MTW Tier II for the final two (2) years. Tier I participants will receive case management services with an emphasis on overcoming barriers to self-sufficiency, education, financial literacy, and increasing their potential earning income and employability. A special case assessment will be conducted for all MTW participants who do not complete the program in year five (5). The assessment will be conducted by the case manager and reviewed by the Social Service Senior Administrator before the participant begins the MTW Tier II level. Tier II participants will continue to receive case management services during the final two (2) years of the program, but with an emphasis on job placement and retention and becoming ready to move out of subsidized housing by year seven (7). After the seventh (7th) year of participation, the family will stop receiving housing assistance. A participant may request that their case be reviewed by the Hardship Panel if they have extenuating circumstances supporting a continuation of housing assistance beyond the seven (7) year period.
- B. All families currently in the Safety-Net will be integrated into the MTW program as Tier II participants and will be provided with case management (as noted above) to help them prepare to move into other forms of non-DSHA housing. Starting effective July 1, 2011, these existing residents will be given one (1) year from the date of their next annual recertification to complete the revised MTW Tier II program. After the end of this period, the family will stop receiving housing assistance. A participant may request that their case be reviewed by the Hardship Panel if they have extenuating circumstances supporting a continuation of housing assistance beyond the seven (7) year period.
- C. DSHA is partnering with the Delaware Department of Labor to provide employment services through the Mobile One-Stop program at our public housing sites and additional employment related services for participants that require assistance. DSHA continues to work with the Department of Labor and the Delaware Economic Development Office to share information on new industry and business coming to Delaware, job trends and current job information. As needed, meetings will be scheduled for all parties as well as MTW participants.
- D. DSHA will continue to require all MTW participants to complete financial literacy training.
- E. DSHA will be contracting with the National Council on Agricultural Life and Labor Research Fund, Inc. (NCALL) to provide "Getting Ready for Fair Market Housing" workshops for MTW Tier II Participants. Through the workshops, each resident will develop the steps that they need to take to transition to fair market housing. The workshops may be expanded to MTW Tier I participants in the future.

as the number of MTW Tier II participants are reduced.

- F. DSHA is working to continue providing services that were formerly funded under the Public Housing Drug Elimination Program (PHDEP). Funds from the Capital Fund Program and Housing Choice Voucher Reserves will be used to provide limited security services, fencing improvements and to install surveillance cameras at additional PH properties during FY2012. Sites scheduled to receive surveillance cameras include: McLane Gardens and Annex and Mifflin Meadows.
- G. DSHA is working to continue providing services that were previously funded from the MTW Technical Assistance Grant. Computer education and scholarships were funded from this source. DSHA continues to work to identify potential sources for funding scholarships and computer education.

2.0 (A) HOUSING STOCK INFORMATION

• NUMBER OF PUBLIC HOUSING UNITS AT THE BEGINNING OF FY2011

The number of public housing units in the Delaware State Housing Authority (DSHA) portfolio has not changed during the previous Plan year. The only change anticipated will be under Scattered Site Homeownership, where DSHA is in the process of having eight (8) units removed from PIC that were sold prior to 1996. There are five (5) actual units remaining.

Table 3

Number of Public Housing Units as of July 1, 2010

Public Housing						
	Total Units	Bedroom Size				
		1 BR	2 BR	3 BR	4 BR	5 + BR
Burton Village	51	-	14	28	9	-
Clarks Corner	70	4	26	26	12	2
Hickory Tree	55	-	26	26	3	
Holly Square	24	24	-	-	-	-
Laverty Lane	50	-	40	10	-	-
Liberty Court	108	25	71	12	-	-
McLane Gardens	29	12	6	6	4	1
McLane Gardens Annex	21	-	12	6	3	-
Mifflin Meadows	54	6	8	24	12	4
Peach Circle	32	32	-	-	-	-
Scattered Sites-Rental	9	-	-	9	-	-
Scattered Sites-Owner	5*	-	-	5*	-	-
TOTAL	508	103	203	152	43	7

• **SIGNIFICANT CAPITAL EXPENDITURES BY DEVELOPMENT-FY2010**

This section compares FY2009 budgeted capital work with the actual FY2010 Capital Expenditures by property.

Table 4

ACTIVITY	COMMUNITIES	ORIGINAL BUDGET	REVISED BUDGET	EXPENDED
Wall Packs Replacements	Burton Village	23,910.00	23,910.00	23,910.00
Architect Fees – Roof Replacements	Hickory Tree	10,410.00	11,466.83	5,763.70
Architect Fees – Solar Panels	Hickory Tree	24,066.00	10,043.00	10,043.00
Architect Fees - HVAC Upgrades	Hickory Tree	12,800.00	12,800.00	4,454.40
Architect Fees – Window Replacements	Lavery Lane	10,800.00	11,946.94	6,529.54
Architect Fees – Siding Replacement	Lavery Lane	8,640.00	9,243.92	5,714.40
Siding Replacement	Lavery Lane	142,863.95	149,692.29	100,756.00
Architect Fees – Parking Lot Improvements	Clark’s Corner	7,500.00	8,629.14	3,212.57
Architect Fees – Parking Lot Improvements	Liberty Court	23,000.00	23,090.00	23,090.00
Sidewalk Repairs	Liberty Court	4,757.15	4,757.15	4,757.15
Architect Fees - Window & Door Replacements	McLane Gardens	24,125.00	24,820.64	6,406.50
Architect Fees – Roof Replacements	McLane Gardens	8,950.00	9,649.90	5,750.48
Water Line Replacement	McLane Gardens	3,453.35	3,453.35	3,453.35
Architect Fees – Bathroom Renovations	McLane Annex	13,800.00	13,834.67	5,015.00
	McLane Annex	980.23	980.23	980.23
Door Replacements	Mifflin Meadows	8,190.08	8,190.08	8,190.08
Architect Fees – Playground Equipment	Mifflin Meadows	15,000.00	16,502.74	11,993.44
Architect Fees – Security Cameras	Mifflin Meadows	20,502.00	23,157.00	12,566.10
Architect Fees – Parking Lot Improvements	Mifflin Meadows	7,000.00	8,000.00	3,212.57
Storm Water Discharge Application Fee	Mifflin Meadows	195.00	195.00	195.00
Architect Fees – Roof Replacements	Peach Circle	9,590.00	9,970.45	3,308.67
Administrative Costs	Authority Wide	80,844.00	80,844.00	80,844.00
Management Improvements - Printing and Bid Advertising	Various Sites	12,000.00	14,070.96	14,070.96
Capital Program Totals		497,278.76	491,659.79	356,628.64

DISCUSSION OF THE CAPITAL EXPENDITURE AMOUNTS:

The following are descriptions of the expenditures made during FY2010 that exceeded 30% of the agencies total budgeted capital expenditures for the fiscal year. Total Planned Expenditures for FY2010 were \$630,284.00.

Laverty Lane siding Replacement: \$151,503.95 (Siding Replacement: \$142,863.95 and Architect Fees: \$8,640.00). This entailed the removal and replacement of existing siding on 24 buildings.

○ NEW PUBLIC HOUSING UNITS TO BE ADDED DURING FY2012

DSHA does not plan to add any new public housing units to the agency portfolio during FY2012.

○ NUMBER OF PUBLIC HOUSING UNITS REMOVED FROM INVENTORY DURING FY2010

DSHA does not plan to remove any units from the public housing inventory during FY2012, although DSHA is in the process of correcting the unit count shown in PIC by removing eight (8) Scattered Site Homeownership units that were sold prior to 2006.

○ NUMBER OF MTW HOUSING CHOICE VOUCHERS AUTHORIZED AT THE BEGINNING OF FY2011

Fifty (50) Family Unification Program (FUP) voucher were awarded to DSHA in October 2009. These vouchers are to be used for 1) Families for whom the lack of adequate housing is a primary factor in the imminent placement in foster care, or delaying the return of the children from foster care, 2) Youth 18 to 21 years of age exiting foster care. DSHA does not plan any further changes to the number of MTW or non-MTW vouchers authorized for use by DSHA as of July 1, 2011. DSHA does not have any project-based Housing Choice Vouchers.

Table 5

Housing Choice Voucher Program	
Moving To Work Vouchers	903
HUD Conversion Vouchers	2
Family Unification Program Vouchers	50
TOTAL	955

2.0 (B) LEASING INFORMATION-ACTUAL AS OF JUNE 30, 2010

A. WORK ORDER RESPONSE TIMES

DSHA responds to 100% of emergency work orders within 24 hours and 100% of non-emergency work orders in less than 15 days.

FY10 Actual Response Time
Emergency Non-Emergency
2 hrs 4 days

TABLE 6
Public Housing Management Information

	FY08 Actual	FY09 Actual	FY10 Actual	FY11 7/1/10 – 2/01/11	Planned FY12
Occupancy Percentage Overall	98%	98%	98%	98%	98%
Average Turnover Time - Days	50	58	33	52	20
Rent Collections	96%	96%	96%	96%	98%
Inspections - # of units	503	503	503	503	503

TABLE 7
Public Housing Vacancy and Occupancy - 7/1/07 - 2/1/11*

Development	Total Units	Units Vacated			Occupancy 2/01/11	Planned FY12	Anticipated Total Number Leased
		FY08	FY09	FY10			
Burton Village	51	11	5	7	94%	98%	50
Clarks Corner	70	11	9	13	90%	98%	69
Hickory Tree	55	13	10	8	100%	98%	54
Holly Square	24	2	2	1	100%	98%	24
Laverty Lane	50	10	8	9	96%	98%	49
Liberty Court	108	26	24	17	95%	98%	106
McLane Gardens	29	5	3	5	96%	98%	28
McLane Gardens Annex	21	2	3	7	95%	98%	21
Mifflin Meadows	54	6	15	10	94%	98%	53
Peach Circle	32	2	8	1	100%	98%	31
Scattered-site rentals	9	2	1	1	92%	98%	9
Total	503	90	88	79	98%		

***Does not include Public Housing Homeownership Units (5 total)**

- **Anticipated total number of non-MTW Public Housing Units leased in Plan year :**

All Public Housing unit leased are under the MTW Program.

- **Anticipated total number of MTW Housing Choice Voucher units leased in Plan Year:**

Table 8

Anticipated Total Number of MTW and Non-MTW units leased during FY2012

Program	August 1999	Beginning of FY-2011	End of FY-2012 (Planned)
MTW	803	903	903
Non-MTW (Conversion)	-0-	2	2
Family Unification Program	-0-	23	50
Total	803	928	955

○ **Description of any issues relating to leasing of Public Housing Units or Housing Choice Vouchers:**

PUBLIC HOUSING: The public housing occupancy rate has been on average 95% to 98% over the past few years. The high turnover rates experienced at some sites are the result of DSHA's strict enforcement of rent payment and anti-crime policies. The importance of timely rent payment is constantly stressed to residents by the housing managers as well as the MTW case managers. Though criminal background checks are performed prior to admission of all new residents 18 years of age and older, we still lose families because of drug-related criminal activity, many times involving their non-resident visitors. DSHA has found that the larger four (4) and five (5) bedroom units are the hardest apartments to fill with acceptable residents.

HOUSING CHOICE VOUCHERS: DSHA's Housing Choice Voucher utilization rate during FY2011 has averaged 98% to 100%. Lease-up figures for the past 12 months show that 70% of families on the waiting list successfully leased a unit within 120 days after receiving their new voucher. This lease rate is at the historical average, with many HCV residents electing to lease in-place.

Applicants are given in-depth information about DSHA's extension policy at voucher briefing sessions and reminders are mailed at the end of the 60-, 90- and 120-day periods. They are also given an extensive list of landlords willing to participate in the HCV Program. The extension approval policy is liberal and only requires voucher holders to show a list of landlords who have been contacted during the period. Extensions beyond the maximum 120-day search period are given to disabled families who are having difficulty finding a suitable unit. Extensions may also provide for non-disabled applicants that have extenuating circumstances limiting their ability to find an acceptable unit.

DSHA implemented a new on-line rent reasonableness system in March 2004, which helps ensure more objectively and accurately that Housing Choice Voucher units are rented at rates comparable to the local markets.

In reference to the ability of a family to use the Portability feature of the housing choice voucher, only those families that are exempt from the MTW program are allowed to take their voucher outside of DSHA's jurisdiction. MTW participants are **not eligible** to use the portability feature of their voucher **unless:** they document that they have been offered employment outside of DSHA's jurisdiction or must move for medical purposes (immediate family members) outside of DSHA's jurisdiction.

FAMILY UNIFICATION VOUCHERS (FUP): DSHA received an allocation of fifty (50) Family Unification Program (FUP) vouchers during FY2010. DSHA is working in conjunction with other agencies in Delaware to issue and lease these vouchers throughout the state, not just in Kent and Sussex Counties. Applicants for the vouchers are referred to DSHA via individual case workers (for families) and by the Delaware Department of Family Services (for youth exiting foster care). While the majority of FUP vouchers set aside for families have been issued and leased, the number of referrals for youth existing foster care have been less than needed to fully issue and lease 100% of the vouchers for this category. DSHA anticipates that the number of referrals will increase during the last half of FY2011 and in FY2012 as a significant number of youth existing foster care will be turning 18 years old and be eligible for the FUP voucher program.

○ **Number of project-based vouchers committed or in use at the end of Plan year:**

DSHA does not plan to use any Housing Choice Vouchers as project-based vouchers by DSHA during the FY2012 Plan year.

2.0 (C) WAITING LIST INFORMATION

○ **Description of anticipated changes in waiting lists (community wide)**

The waiting list is a combined list for Housing Choice Voucher Program Vouchers and Public Housing. MTW applicants are provided the type of housing that is available when their name comes to the top of the list. The waiting list has been open since 1991, and DSHA anticipates that it will remain open. There is significant change in the number of applicants since last year. Prior to the commencement of MTW, the wait for housing ranged from about 8 months for some bedroom sizes in Public Housing, to about 22 months for a Housing Choice Voucher. Currently, the wait for those with an MTW preference and the elderly/disabled is approximately eighteen months for Public Housing and 24 months for the Housing Choice Voucher Program. Although DSHA does not anticipate any changes to the waiting list structure during FY2012, it plans to eliminate the subsidy choice between Public Housing and Housing Choice Vouchers for elderly and disabled families. With this change, all applicants (MTW participants and exempt elderly/disabled applicants) will be required to accept the form of subsidy offered (Public Housing or HCV). If the applicant desires a form of subsidy other than what is offered (Public Housing or HCV), their name will be placed on the bottom of the waiting list based on the date of refusal.

○ **Description of anticipated changes in the number of families on the waiting list during FY2012**

Based on the current economic climate and increase in utility and rental costs, we anticipate that the total number of applicants on the waiting list will grow approximately 10% during FY2012. The increase in applicants shown below can be partially attributed an overall poor economy in the state and lack of affordable housing. In addition, the implementation of a web-based application process in 2007 has made applying for housing more accessible to the general public and has increased the number of out-of-jurisdiction applications.

DSHA does plan to revise existing Waiting List procedures to ensure that MTW Eligible and MTW Exempt (elderly, disabled) applicants are treated equally in that they have no choice in the type of housing subsidy they will receive (Public Housing or Housing Choice Voucher), unless there is a verifiable need

and request for a Reasonable Accommodation. This revised policy should increase the overall number of MTW applicants receiving housing choice vouchers.

Table 9

Number of Households on the Waiting List by Bedroom Size on February 1, 2011

Combined Public Housing and Housing Choice Voucher Waiting List							
	Total Households		February 2011				
	FEB 2010	FEB 2011	1 BR	2 BR	3 BR	4 BR	5 + BR
Family	4,767	5,575	1,206	2,260	1,603	417	89
Elderly/Disabled	2,387	2,108	1,397	417	208	68	18
Total	7,154	7,683	2,603	2,677	1,811	485	107

2.0 (D) CAPITAL PLANS

A. STATEMENT OF EXISTING NEEDS

The total amount of DSHA existing capital needs is approximately \$8,385,472 which is \$16,506.83 per unit. These funds will be used over a five-year period to modernize and update our developments, some of which are 30 years old.

DSHA has received on average \$807,797 annually for the past five years. The FY2010 Capital Fund Program was funded at \$814,204.

B. PLANNED CAPITAL EXPENDITURES

The five-year capital plan for DSHA is broken down by fiscal year. The plan reflects Capital Fund Program funds equal to the amount we expect to receive for FY2011, which is \$814,204. The appropriate planning process and public hearings were held to get input from our residents and the public.

Table 10 that follows shows our five-year capital plan, including the planned use of the most recent funding.*

TABLE 10**Five Year Capital Plan**

	FY2012	FY2013	FY2014	FY2015	FY2016
Physical Improvements	\$650,784	\$650,784	\$650,784	\$650,784	\$650,784
Administration	\$81,420	\$81,420	\$81,420	\$81,420	\$81,420
Management Improvements & Police Protection	\$32,000	\$32,000	\$32,000	\$32,000	\$32,000
Fees & Costs	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000
TOTAL	\$814,204	\$814,204	\$814,204	\$814,204	\$814,204

*Included with this document as Attachment A are the budget submissions to HUD.

Table 11
Capital Expenditures Planned for FY2012

Capital Project (list by Name)	Total Planned Expenditure in Current Year (specify year)
Clarks Corner	\$ 0 2012
McLane Gardens	\$ 15,660 2012
Peach Circle	\$ 26,280 2012
Mifflin Meadows	\$ 0 2012
Burton Village	\$ 4,921 2012
McLane Gardens Annex	\$ 76,000 2012
Lavery Lane	\$ 140,000 2012
Hickory Tree	\$ 0 2012
Scattered Sites – Phase I	\$ 9,000 2012
Liberty Court I	\$ 0 2012
Liberty Court II	\$ 325,000 2012
Hickory Tree – Phase II	\$ 0 2012
Holly Square	\$ 25,000 2012
Scattered Sites – Phase II	\$ 9,000 2012
Total	\$ 630,861

TABLE 12
Physical Needs Assessment

		2012	2013	2014	2015	2016
CLARK'S CORNER	COST					
Maintenance Building	70,000					
Community Building Solar Panels/Energy	200,000					
Replace Siding/Shutter-Reserves 2013	165,000					
Community Building & Phase II Re-roofing	126,000					126,000
Playground Equipment	84,000			84,000		
Dumpster Enclosures	75,000					
Bicycle Path	27,000					
TOTAL	747,000	0	0	84,000	0	126,000

MCLANE GARDENS	COST					
Reinforce Stairways	14,500	14,500				
Replace Sidewalks	25,000				22,500	
Recessed Lights	1,160	1,160				
Security Cameras	83,000					
Repave Parking Lot/Drive	45,000				42,861	
Subfloor/VCT Flooring	40,000		25,000	15,000		
TOTAL	208,660	15,660	25,000	15,000	65,361	0

PEACH CIRCLE	COST					
Lighting Upgrades	25,000	25,000				
Repave Parking Lot/Drive	40,800			40,800		
Recessed Porch Lights	1,280	1,280				
TOTAL	67,080	26,280	0	40,800	0	0

MIFFLIN MEADOWS	COST					
Sidewalk Replacement	95,000					
Replace Siding/Shutters-Reserves 2013	157,100					
Dumpster Enclosures	60,000				60,000	
Replace Heater Room Doors	17,550		17,550		15,000	
TOTAL	329,650	0	17,550	0	75,000	0

BURTON VILLAGE	COST					
Maintenance Building Siding	4,921	4,921				
Community Building Solar Panels	200,000					
HVAC Improvements	460,000					
Roof Replacements	340,000				340,000	
Window Replacements	119,000					
Playground Equipment	142,000		81,361			
Border Fence	176,000		88,000	88,000		
Repave Parking Lot/Drive	115,000					115,000
Bathroom Renovations	642,600					
TOTAL	2,199,521	4,921	169,361	88,000	340,000	115,000

TABLE 12 (cont)

Physical Needs Assessment

		2012	2013	2014	2015	2016
MCLANE ANNEX	COST					
Re-Roofing	76,000	76,000				
Security Cameras	60,000					
Play Area	112,000		112,000			
Repave Parking Lot	50,000				50,000	
Replace Flooring	75,000			25,000	25,000	
Replace Sidewalks/Curbs	50,000					
Kitchen Appliances	20,000			20,000		
HVAC Upgrades	210,000					
TOTAL	653,000	76,000	112,000	45,000	75,000	0

LAVERTY LANE	COST					
Parking Lot Expansion	50,000					
Security Cameras	140,000	140,000				
Kitchen Rehabilitation	325,000					
Replace Screen Doors	80,000			77,061		
Shed Siding	4,900		5,979			
Comm. Building Septic Repairs	40,000					40,000
Bathroom Rehabilitation-Reserves 2012	550,000					
Perimeter Fence	150,000					
TOTAL	1,339,900	140,000	5,979	77,061	0	40,000

HICKORY TREE	COST					
Playground Equipment Community Building	100,000					
Screen Doors	56,000					
Perimeter Fence	150,000					
Re-Roofing	135,000					
Security Cameras	140,000		140,000			
Kitchen Rehab.	227,500			226,500		
Bathroom Rehab.-Reserves 2016	441,000					
Subfloors/VCT Replaced	18,000				6,000	6,000
TOTAL	1,267,500	0	140,000	226,500	6,000	6,000

SCATTERED SITES-1; 010	COST					
Air Conditioning – 1 Site		9,000				
TOTAL	0	9,000	0	0	0	0

SCATTERED SITES-2; 015	COST					
Air Conditioning – 1 Site	9,000	9,000				
Heater Replacement – 1 Site	9,000	0	9,000	0	20,000	
TOTAL	18,000	9,000	9,000	0	20,000	0

TABLE 12 (cont)

Physical Needs Assessment

		2012	2013	2014	2015	2016
LIBERTY COURT I	COST					
Community Building Solar Panels	90,000					
Replace Electric Panels	26,500		26,471			
Drainage Improvements	73,000		73,000			
Front Door Replacements	53,000		53,000			
Kitchen Rehabilitation-Reserves 2015	323,300					
TOTAL	565,800	0	152,471	0	0	0

LIBERTY COURT II	COST					
Community Building Solar Panels	90,000					
Bathroom Renovations	325,000	325,000				
Kitchen Rehabilitation	314,361					314,361
Front Door Replacements	55,000			55,000		
TOTAL	784,361	325,000	0	55,000	0	314,361

HICKORY TREE II	COST					
TOTAL	0	0	0	0	0	0

HOLLY SQUARE	COST					
Concrete Pads/Sidewalks	50,000	10,000	10,000	10,000	10,000	10,000
Perimeter Fencing	100,000				50,000	30,000
Outdoor Lighting Upgrade	15,000	15,000				
Replace Roofs	40,000					
TOTAL	205,000	25,000	10,000	10,000	60,000	40,000

Police Protection		30,000	30,000	30,000	30,000	30,000
Energy Audit		10,500	0	0	0	0
Administration		80,843	80,843	80,843	80,843	80,843
Management Improvements		12,000	12,000	12,000	12,000	12,000
Fees		50,000	50,000	50,000	50,000	50,000

* 8,385,472

TOTAL 814,204 814,204 814,204 814,204 814,204

* Total excludes soft costs such as management, administration and fees.

3.0 NON-MTW RELATED HOUSING AUTHORITY INFORMATION:

Delaware State Housing Authority (DSHA) was created in 1968. Over the past 40 years, DSHA has emerged to serve an integral role in Delaware's overall economic and social plan, demonstrated by the inclusion of the DSHA Director as part of the Governor's Cabinet in Delaware State Government.

Today, DSHA functions as a government agency and an entrepreneurial developer and lending institution.

DSHA makes mortgage and other loans to both for-profit and nonprofit housing sponsors. We also extend loans to mortgage lenders and require that proceeds be used to create new residential mortgage loans. DSHA also applies for, and receives, subsidies from the federal government and other sources, in addition to issuing its own bonds and notes. In addition to its role as the State's Housing Finance Agency, DSHA is unique in that it also owns and operates Public Housing, and acts as a community development agency.

Our core business focuses on preservation, new construction, homeownership, rental assistance, resident services, asset management, rehabilitation, homeless prevention, emergency and transitional housing, and community development. DSHA provides a host of programs to address Delaware's affordable housing needs, most of which are available on a statewide level.

To assist in supporting these types of assistance, DSHA also researches the nature of Delaware's housing needs through such vehicles as needs assessments, rental surveys and housing production reports. DSHA staff members serve on a variety of boards and committees related to housing.

To administer all of these programs and to achieve its goal of providing affordable and safe housing for low- and moderate-income persons, DSHA employs a full-time staff of 131 and is divided into seven interdependent sections: Administration, Asset Management, Community Development & Planning, Community Relations, Housing Development, Housing Finance, and Housing Management.

4.0 LONG-TERM MTW PLAN

DSHA's long-term vision for the MTW Program will be to expand and evolve current activities, utilize a greater number of the authorizations permitted under the MTW agreement and create a comprehensive system to identify and document MTW accomplishments. With the acceptance of the Restated and Amended MTW Agreement, DSHA will be looking at the following areas:

- A. Adoption of income/asset verification procedures in lieu of the current HUD system for both Public Housing and Housing Choice Vouchers. This would allow DSHA to reduce costs and make the processing of applications and interim/annual certifications more efficient.
- B. Explore alternative rent policies to simplify the calculation of subsidy and tenant rents. This includes a process that would be less intrusive to the residents, simple to perform and understand, reduce the potential for errors, and reduce administrative burden and transaction volume. DSHA would work with housing advocates, residents and other interested parties to insure that any proposed alternative rent policies would be equitable and fair to residents.
- C. Eliminate utility reimbursement payments for families where 100% of the contract rent is subsidized (with the exemption elderly/disabled families).

5.0 PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED

- **None for FY2012**

6.0 ONGOING MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED – LISTED BY STATUTORY OBJECTIVE

Activity Name	<u>Time Limiting Housing Assistance for MTW Participants</u>
Activity Number	A-1
Statutory Objective	MTW Activities to reduce costs and achieve greater cost effectiveness by administrative reforms to the Public Housing (PH) and Housing Choice Voucher Programs as indicated below:
MTW Activity	<p>Time-limit housing assistance for MTW participants to seven (7) years (effective FY2012). This includes an initial five (5) year period, with a two (2) year extension. The initial five (5) year period will be called MTW Tier I and the two (2) year extension will be called MTW Tier II. The previous time limit was five (5) years, with a potential one (1) year extension. #1. This improves the overall cost effectiveness of the housing programs by #2. Moving families into self-sufficiency and non-subsidized housing, and #3. Allowing another eligible family in need of housing to participate in the MTW program. <u>Identified and Implemented in initial Plan for FY2004.</u></p> <p><u>Definition of Self-Sufficiency:</u> Families who increase their incomes to the level where 40% of their monthly gross income equals or exceeds the fair market rent for the unit they are currently renting or a non-subsidized unit they contract to lease, and move into unsubsidized rental housing or homeownership.</p>
Update on the Status of Activity	MTW Participants currently have a time-limit for housing assistance for MTW participants for five (5) years with a potential one (1) year extension. Those residents that are not able to achieve self-sufficiency during the five (5) year period are eligible to continue receiving housing assistance under a Safety-Net Program if they are in compliance with program and lease requirements.
Changes to Activity	For FY2012, the time-limit was increased from five (5) to seven (7) years, with two levels of participation; MTW Tier I for the first five (5) years and MTW Tier II for the final two (2) years. The Safety-Net program will be eliminated. After the seventh (7 th) year of participation, the participant will stop receiving housing assistance. A participant may request that their case be reviewed by a Hardship Panel/Board if they have extenuating circumstances supporting a continuation of housing assistance beyond the seven (7) year period. No changes or modifications, or any additions to Attachment C/D authorizations are required for the changes noted above
Anticipated Impact	#1. Able to serve more people with same amount of funding; #2. Create increased homeownership or Fair Market rental options with the use of MTW savings; #3. Reduce recidivism on Waiting List.
Baseline	The baseline will be the number of MTW participants in their fifth year and 7 th of the program, the number successfully completing the program and the number going to Exempt Status for FY2012.
Benchmark	The benchmark will be a percentage of MTW participants graduating from the MTW program for each year from FY2008 to FY2018.
Data Collection/Metrics	The Case Management and Easy Housing resident software will be utilized to track and identify the number of MTW participants, program graduates and Safety Net families. The programs are being modified to provide this data starting with FY2008. <u>No outside evaluators are used.</u>

Authorization(s)

1) Attachment C, Section C. Authorizations Related to Public Housing Only, Paragraph 11. Rent Policies and Term Limits. This authorization waives certain provisions of Section 3(a)(2), 3(a)(3)(A) and Section 6(l) of the 1937 Act and 24 C.F.R 5.603,5.611, 5.628, 5.630, 5.632, 5.634 and 960.255 and 966 Subpart A as necessary to implement the Agency's Annual MTW Plan.

2) Attachment C, Section D. Authorizations Related to Housing Choice Vouchers Only, Paragraph 2(a) and 2(d). Rent Policies and Term Limits. This authorization waives certain provisions of Section 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R 982.508,982.503 and 982.518 A as necessary to implement the Agency's Annual MTW Plan.

Activity Name **MTW Tier I - Mandatory Employment and/or Education Requirement**

Activity Number A-2

Statutory Objective MTW Activities to reduce costs and achieve greater cost effectiveness and self sufficiency by administrative reforms to the Public Housing (PH) and Housing Choice Voucher Programs as indicated below:

MTW Activity MTW participants are required to be employed at least 20 hours per week earning no less than minimum wage, or in a training or educational program for at least 20 hours per week. (For residents moving in on or after July 1, 2007, requirements were increased to 25 hours per week beginning with their third year in the MTW program and 30 hours per week for the fourth and any subsequent years in the MTW program.) #1. This is to stimulate an increase in resident earning potential; #2. Create a stepped requirement leading to self-sufficiency; #3. And reduce the subsidy needed for the participant. Initially implemented in FY2000 Annual Plan, revised in the FY2008 Annual Plan.

Update on the Status of Activity All MTW Participants continue to have a mandatory work hour and educational requirements as noted above.

Changes to Activity No changes or modifications, or any additions to Attachment C/D authorizations are planned.

Anticipated Impact #1. Able to serve more people with same amount of funding; #2. Create increased homeownership or Fair Market rental options with the use of MTW savings; #3. Reduce recidivism on Waiting List.

Baseline The baseline will be the total number of MTW participants, the number employed, and a range of weekly hours worked (20-24 hr, 25-29 hrs, 30-34 hrs, and 35+ hours) as of FY2008.

Benchmark The benchmark will be based on a percentage of MTW participants that are employed at least 20 hours per week on an annual basis from FY2008 to FY2018. **This benchmark has been redefined by including the wording “at least 20 hours per week” since this is a requirement of the MTW program.**

Data Collection/Metrics The Case Management and Easy Housing resident software will be utilized to track individuals with employment income and weekly hours. Both software systems are being modified to provide this information for FY2008 and beyond. No outside evaluators will be used.

Authorization(s) 1) Attachment C, Section E. Authorizations Related to Family Self-Sufficiency, This authorization waives certain provisions of Section 23 of the 1937 Act and 24 C.F.R 984 as necessary to implement the Agency’s Annual MTW Plan.
2) Attachment C, Section D. Authorizations Related to Housing Choice Voucher Only, Paragraph 3 (a). Eligibility of Participants, This authorization waives certain provisions of Section 16(b) and Sections 8(o)(4) 1937 Act and 24 C.F.R 5.603, 5.609, 5.611, 5.628 and 982.201 as necessary to implement the Agency’s Annual MTW Plan.

Activity Name	<u>MTW Tier II Work Requirement</u>
Activity Number	A-3
Statutory Objective	MTW Activities to reduce costs and achieve greater cost effectiveness by administrative reforms to the Public Housing (PH) and Housing Choice Voucher Programs as indicated below:
MTW Activity	Participants who did not successfully complete the MTW program within five (5) years (under MTW Tier I) will continue to be required to work at least thirty (30) hours per week, earning no less than minimum wage, for the remaining two (2) years while under the MTW Tier II. This requirement increases the earned income of MTW Tier II participants enabling them to pay more towards their rent and requiring less overall subsidy. <u>Initially implemented in the FY2004 Annual Plan</u>
Update on the Status of Activity	All MTW Tier II participants continue to be required to work at least thirty (30) hours per week, earning no less than minimum wages.
Changes to Activity	Previously, the participants who did not successfully complete the MTW Program within five (5) years were eligible to continue receiving housing subsidy under a Safety-Net Program for an indefinite period. The Safety-Net has been renamed MTW Tier II and the entire program time-limited to seven-years (five (5) years under MTW Tier I and two (2) years under MTW Tier II. No changes or modifications, or any additions to Attachment C/D authorizations are required for the changes noted above.
Anticipated Impact	By continuing the work requirements while in MTW Tier II, the tenant will require less subsidy and will continue to work to achieve self-sufficiency.
Baseline	The baseline will be the total number of MTW Tier II participants, the number employed, a range of weekly hours worked (20-30 hrs, 30+ hours) and the working income of Safety Net families as of FY2008.
Benchmark	The benchmark will be based on a percentage of MTW Tier II participants that are employed and increase income on an annual basis from FY2008 to FY2018.
Data Collection/Metrics	Easy Housing resident software will be utilized to track and identify the number of MTW participants, successful completions and Safety Net families. The Easy Housing software already provides this data. <u>No outside evaluators are used.</u>
Authorization(s)	Attachment C, Section C. Authorizations Related to Public Housing Only, Paragraph 2, Local Preferences and Admission and Continued Occupancy Policies and Procedures. This authorization waives certain provisions of Section 3 of the 1937 Act and 24 C.F.R 960.206 as necessary to implement the Agency's Annual MTW Plan.

Activity Name	<u>Alternative Re-Certification Schedule for Elderly and Disabled Residents</u>
Activity Number	A-5
Statutory Objective	MTW Activities to reduce costs and achieve greater cost effectiveness by administrative reforms to the Public Housing (PH) and Housing Choice Voucher Programs as indicated below:
MTW Activity	Adopt alternative re-certification schedules for elderly and disabled residents. For example, re-certifying residents on fixed incomes (fixed pensions, Social Security, SSI) every-other year. For the Housing Choice Voucher Program, half of the approximate 650 elderly/disabled re-certifications would be performed during FY2011, and the remaining half would be completed during FY2012. For Public Housing, which has a significantly lower elderly/disabled population, all re-certification of these individuals would be done every-other year starting FY2011.
Hardship Policy	If a resident has a significant change in income or allowable medical expenses, they can request an interim recertification be completed during the years when an annual recertification is not scheduled.
Anticipated Impact	This initiative will reduce the total number annual re-certifications processed by Public Housing and Housing Choice Voucher staff, thus creating administrative efficiencies (reduction in postage costs, time savings).
Baseline	The baseline will begin with the Annual MTW Report for FY2011 and will be based on the total number of elderly/disabled, fixed income participants processed for annual re-certification.
Benchmark	The benchmark will be the total number of estimated man-hours associated with the processing of annual re-certifications for elderly/disabled residents vs. the bi-annual re-certifications of elderly/disabled residents
Data Collection/Metrics	Easy Housing resident software will be utilized to track and identify the number of effected participants.
Authorization(s)	Attachment C, Section C. Authorizations Related to Public Housing Only, Paragraph 4, Initial, Annual and Interim Income Review Process, Attachment C, Section D. Authorizations Related top Section 8 Housing Choice Vouchers Only, (1) Operational Policies and Procedures, Paragraph (c.). This authorization waives certain provisions of Section 3 of the 1937 Act and 24 C.F.R 960.206 as necessary to implement the Agency's Annual MTW Plan.

Activity Name

MTW Savings Account and Disbursements

Activity Number

B-1

Statutory Objective

MTW activities to give incentives to families who are employed or seeking employment and self-sufficiency with the following initiatives:

MTW Activity

To make work pay, cap rent, with all funds over the cap up to the 35% limit placed in a savings account for the MTW participant. When a client reaches the end of the contract (5 years or less) if their income has increased to where 40% of their monthly gross income equals or exceeds the fair market rent for their unit they currently rent, or a non-subsidized unit they commit to lease or home ownership they will receive the balance of any monies in their savings account. If a client does not successfully complete the MTW Program, all savings account funds will be forfeited. Initiated in the FY2000 Annual Plan.

As of FY2011 this activity was modified to include provisions for the use of MTW saving funds. Successful MTW clients will be required to utilize at least 60% of the savings fund for homeownership/fair market rental related expenses. This includes: down payment, closing costs, security deposits, utility deposits, clearing credit issues and satisfying debt for medical bills, education and transportation. The remaining 40% of the MTW savings is distributed to the client for discretionary use. Initiated in the FY2011 Plan.

Status of the Activity

All MTW Participants continue to have the ability to contribute to the MTW savings account and use the funds as noted above upon successful completion of the program.

Changes to Activity

For FY2012, The MTW Savings Account will be expanded to include individuals in years 6 and 7 of the program. For participants that successfully complete the program before or in the fifth (5th) year of the program (under MTW Tier I), they will be eligible to utilize 100% of their MTW savings account. Contributions to the MTW Savings will stop after the 5th year. For participants in their sixth (6th) and seventh (7th) year of the MTW Program (under the MTW Tier II), they will have access to only 60% of MTW Savings in year six and 40% of MTW Savings in year 7. No anticipated changes or modifications, or any additions to Attachment C/D authorizations are planned for the revision noted above.

Anticipated Impact

Encourage residents to work at capacity rather than least amount required. Provides participants with funds to repair credit, debt issues and/or move into Home ownership upon successful completion of MTW program.

Baseline

The baseline will be the number of participants that successfully complete the MTW program during FY2008 (page 29) and the average amount of escrow disbursements each year thereafter. The baseline will also show if a participant moves into homeownership or unsubsidized rental housing.

Benchmark

The benchmark will be based on the projected number of successful MTW completions and escrow disbursements from FY2009 to FY2018.

Data Collection/Metrics

Case Management software will be utilized to track and identify the number of MTW residents that have successfully completed the program and amount of disbursements. Case Management software will be updated to provide this data beginning with FY2008-2009. No outside evaluators will be used.

Authorization(s)

1) Attachment C, Section E. Authorizations Related to Family Self-Sufficiency. This authorization waives certain provisions of Section 23 of the 1937 Act and 24 C.F.R 984 as necessary to implement the Agency's Annual MTW Plan.

2) Attachment C, Section C. Authorizations Related to Public Housing Only, Paragraph 5. Use of Public Housing as an Incentive for Economic Progress. This authorization waives certain provisions of Section 6 (c) of the 1937 Act and 24 C.F.R 960.201 as necessary to implement the Agency's Annual MTW Plan.

Activity Name	<u>MTW Case Management Services</u>
Activity Number	B-2
Statutory Objective	MTW activities to give incentives to families who are employed or seeking employment and self-sufficiency with the following initiatives:
MTW Activity	All MTW participants (MTW Tier I and Tier II) continuously participate in case management and are offered services and/or resource referrals including job training and placement services, computer experience, financial literacy classes and transportation stipends, as funds allow. <u>Initiated in the FY 2000 Annual Plan.</u>
Status of Activity	All MTW participants continue to receive personalized case management services and/or resource services, on a quarterly basis or as needed.
Changes to Activity	For FY2012, case management activities are include not only for the participants within their initial five (5) year period under MTW Tier I, but to those participants that continue in the program for the remaining two (2) years under MTW Tier II. No changes or modifications, or any additions to Attachment C/D authorizations for the changes noted above are required.
Anticipated Impact	Better prepares MTW participants to succeed in finding employment and overcoming barriers to self-sufficiency.
Baseline	The baseline will be the number of referrals and participants actively involved in case management programs for FY2008-2009.
Benchmark	The benchmark will be based on a percentage of participants actively involved in programs from FY2009 to FY2018.
Data Collection/Metrics	Case Management software will be utilized to track and identify the number of MTW residents that have participated in services and/or programs. Case Management software will be updated to provide this data beginning with FY2008-2009. <u>No outside evaluators will be used.</u>
Authorization(s)	1) Attachment C, Section B. Authorizations Related to Both Public Housing and Housing Choice Vouchers, Paragraph 1. Single Fund Budget with Full Flexibility. Section b. (iii). This authorization waives certain provisions of Section 6 (c) of the 1937 Act and 24 C.F.R 982 and 990 as necessary to implement the Agency's Annual MTW Plan. 2) Attachment C, Section E. Authorizations Related to Family Self-Sufficiency, This authorization waives certain provisions of Section 23 of the 1937 Act and 24 C.F.R 984 as necessary to implement the Agency's Annual MTW Plan.

Activity Name	<u>Removal of Barriers to Self-Sufficiency</u>
Activity Number	B-3
Statutory Objective	MTW activities to give incentives to families who are employed or seeking employment and self-sufficiency with the following initiatives:
MTW Activity	Enhance the standard of living for residents participating in MTW by assisting residents in the removal of barriers to self-sufficiency (obtain employment, drivers license, purchase vehicle, coordinate child care, obtain GED, enroll for college courses, expunge criminal record, clear credit history). <u>Initiated in the FY2000 Annual Plan.</u>
Status of Activity	DSHA MTW participants continue to be assisted in removing barriers to self-sufficiency in areas such as transportation, education and childcare.
Changes to Activity	No changes or modifications, or any additions to Attachment C/D authorizations are planned.
Anticipated Impact	Better prepares MTW participants to succeed in finding employment and overcoming barriers to self sufficiency.
Baseline	The baseline will be the number of participants with identified barriers to self-sufficiency for FY2008-2009.
Benchmark	The benchmark will be based on a percentage of participants actively working to eliminate barriers and number of actual achievements from FY2009 to FY2018.
Data Collection/Metrics	Case Management software will be utilized to track and identify the number of MTW residents that have participated in services and/or programs to remove specific barriers to self-sufficiency. Case Management software will be updated to provide this data beginning with FY2008-2009. <u>No outside evaluators will be used.</u>
Authorization(s)	1) Attachment C, Section B. Authorizations Related to Both Public Housing and Housing Choice Vouchers, Paragraph 1. Single Fund Budget with Full Flexibility. Section b. (iii). This authorization waives certain provisions of Section 6 (c) of the 1937 Act and 24 C.F.R 982 and 990 as necessary to implement the Agency's Annual MTW Plan. 2) Attachment C, Section E. Authorizations Related to Family Self-Sufficiency, This authorization waives certain provisions of Section 23 of the 1937 Act and 24 C.F.R 984 as necessary to implement the Agency's Annual MTW Plan.

Activity Name	<u>500 Unit Set-Aside for MTW Eligible Participants</u>
Activity Number	B-4
Statutory Objective	MTW activities to give incentives to families who are employed or seeking employment and self-sufficiency with the following initiatives:
MTW Activity	To create a 500 unit set-aside for eligible MTW participants. The set-aside will be administered for both Public Housing and the Housing Choice Voucher Programs to increase the overall number MTW participants. To reach the goal of having 500 participants enrolled in the MTW program, two of every three available units/vouchers will be offered to MTW eligible applicants. Once the set-aside is reached and maintained, public housing units and vouchers would be offered based on preference and date of application.
Status of Activity	DSHA has not initiated the activity during FY2011 due to plans to change the overall MTW program, including the restructuring the time-limit feature and re-integrate Safety-Net participants into the program. DSHA plans to use this activity if changes proposed in the FY2012 plan, and previously instituted in the FY2011 plan are not sufficient to increase the number of participants in the program.
Changes to Activity	No changes or modifications, or any additions to Attachment C/D authorizations are planned
Anticipated Impact	Increase the overall number of MTW participants and create greater turnover of the waiting list as successful participants complete the five (5) year MTW program.
Baseline	The baseline will be the number of participants that were in the MTW program as of July 1, 2010.
Benchmark	The benchmark will be based on the total MTW participants added to the program each year to maintain the 500 set-aside level.
Data Collection/Metrics	Case Management software will be utilized to track and identify the number of MTW residents that enter the program each year.
Authorization(s)	1) Attachment C, Section C. Authorizations Related to Public Housing, Paragraph (2). This authorization waives certain provisions of Section 3 of the 1937 Act and 24 C.F.R 960.206 as necessary to implement the Agency's Annual MTW Plan. 2) Attachment C, Section D. Authorizations Related to Section 8 Housing Choice Vouchers Only, Section 3. Eligibility of Participants, Paragraph (4), Waiting List Policies. Use of Public Housing as an Incentive for Economic Progress. This authorization waives certain provisions of Section 8 (o)(6),8(o)(13)(J) and 8(o)(16) of the 1937 Act and 24 C.F.R 982 subpart E, 983 Subpart F as necessary to implement the Agency's Annual MTW Plan.

Activity Name	<u>Homeownership Counseling</u>
Activity Number	C-1
Statutory Objective #3	MTW activities to improve housing choices for our residents:
MTW Activity	Homeownership counseling and assistance, Individual Development Account referrals, budget counseling, fair market housing counseling, assistance obtaining a Low Income Housing Tax Credit (LIHTC) unit and credit counseling to repair problems. Strategic relations have been established with several non-profit agencies within Kent and Sussex County to provide credit and housing counseling. This includes NCALL Research, People's Place II and First State Community Action Agency. <u>Initiated in the FY2000 Annual Plan.</u>
Status of Activity	DSHA continue to provide homeownership counseling and assistance to both MTW and exempt (elderly/disabled) participants. This includes referrals to program such as Habitat for Humanity, the Resident Homeownership Program and other non-profit counseling organizations.
Changes to Activity	No changes or modifications, or any additions to Attachment C/D authorizations are planned.
Anticipated Impact	Provide more Home Ownership opportunities and prepare tenant to make educated and informed decisions regarding the purchase of a home.
Baseline	The baseline will be the number of participants in counseling activities tracked for FY2008-2009.
Benchmark	The benchmark will be based on a percentage of participants actively involved in counseling programs from FY2009 to FY2018.
Data Collection/Metrics	Case Management software will be utilized to track and identify number of MTW residents that have participated in specific counseling activities. Case Management software will be updated to provide this data beginning with FY2008-2009. <u>No outside evaluators will be used.</u>
Authorization(s)	Attachment C, Section B. Authorizations Related to Both Public Housing and Housing Choice Vouchers, Paragraph 1. Single Fund Budget with Full Flexibility. Section b. (iii). This authorization waives certain provisions of Section 6 (c) of the 1937 Act and 24 C.F.R 982 and 990 as necessary to implement the Agency's Annual MTW Plan.

Activity Name

MTW Savings Account and Loans

Activity Number

C-2

Statutory Objective

MTW activities to improve housing choices for our residents:

MTW Activity

The creation of MTW Savings Accounts, with all funds over the cap up to the 35% limit placed in a savings account for the MTW participant. These savings accounts can be utilized while the participant is actively involved in the MTW program to help overcome barriers to self-sufficiency (purchase or repair a car, college tuition, etc.) or towards homeownership and/or leasing of unsubsidized housing upon successful completion of the program (as noted in Statutory Objective B, MTW Activity B2). Initiated with the FY2000 Annual Plan.

For FY2011 the activity was be modified to include provisions for the use of MTW saving funds. Successful MTW clients will be required to utilize at least 60% of the savings fund for homeownership/fair market rental related expenses. This includes: down payment, closing costs, security deposits, utility deposits, clearing credit issues and satisfying debt for medical bills, education and transportation. The remaining 40% of the MTW savings will be distributed to the client for discretionary use. If a client does not successfully complete the MTW Program, all savings account funds will be forfeited.

Status of Activity

All MTW Participants continue to have the ability to contribute to the MTW savings account and use the funds as noted above.

Changes to Activity

For FY2012, The MTW Savings Account will be expanded to include individuals in years 6 and 7 of the program. For participants that successfully complete the program before or in the fifth (5th) year of the program (under MTW Tier I), they will be eligible to utilize 100% of their MTW savings account. Contributions to the MTW Savings will stop after the 5th year. For participants in their sixth (6th) and seventh (7th) year of the MTW Program (under the MTW Tier II), they will have access to only 60% of MTW Savings in year six and 40% of MTW Savings in year 7. No anticipated changes or modifications, or any additions to Attachment C/D authorizations are planned for the revision noted above.

Anticipated Impact

Assist resident with financial resources to pursue home ownership or other non-subsidized housing.

Baseline

The baseline will be the number and average amounts of disbursements of MTW escrow funds since FY2007 for both MTW loans, and full escrow payments for participants that successfully complete the MTW program.

Benchmark

The benchmark will be based on the projected number and amount of MTW loans and successful completion escrow disbursements for the next ten (10) years.

Data Collection/Metrics

Case Management software will be utilized to track and identify escrow disbursements. No outside evaluators will be used.

Authorization(s)

1) Attachment C, Section E. Authorizations Related to Family Self-Sufficiency, This authorization waives certain provisions of Section 23 of the 1937 Act and 24 C.F.R 984 as necessary to implement the Agency's Annual MTW Plan.

2) Attachment C, Section C. Authorizations Related to Public Housing Only, Paragraph 5. Use of Public Housing as an Incentive for Economic Progress. This authorization waives certain provisions of Section 6 (c) of the 1937 Act and 24 C.F.R 960.201 as necessary to implement the Agency's Annual MTW Plan.

Activity Name	Resident Homeownership Program (RHP)
Activity Number	C-3
Statutory Objective	MTW activities to improve housing choices for our residents:
MTW Activity	A Resident Homeownership Program (RHP) was created to provide eligible DSHA Housing Choice Voucher and Public Housing residents the ability to participate in a program to own a home by utilizing Housing Choice Voucher rental assistance towards the payment of a mortgage. The flexibility of the MTW program has been used to make the program accessible to Public Housing residents and other non-MTW participants, including elderly and disabled families, in addition to Housing Choice Voucher residents. <u>Initiated in the FY2004 Annual Plan.</u>
Status of Activity	In FY2011, DSHA made changes to the RHP program to reduce the duration of the subsidy from the 15 year period (for non-disabled, non-elderly families), and revise the calculation formula used to determine the amount of voucher assistance. These changes provide a more realistic program for the homeowner as they will be better prepared to assume all responsibility for the mortgage at the end of the subsidy period. Families that currently participate in the RHP program will be grandfathered under the existing subsidy calculation.
Changes to Activity	No anticipated changes or modifications, or any additions to Attachment C/D authorizations are planned.
Anticipated Impact	To be able to utilize Housing Choice Voucher to assist eligible participants to purchase a home through this program, especially elderly/disabled (non-MTW) that do not have the opportunity to participate in MTW.
Baseline	The baseline will be the number of participants in the RHP Program during the first year of utilization (2007).
Benchmark	The benchmark will be based on the number of participants anticipated to participate in the RHP program from FY2008 to FY2018.
Data Collection/Metrics	Internal housing choice voucher and RHP records will be used to track participation. <u>No outside evaluators will be used.</u>
Authorization(s)	Attachment C, Section D. Authorizations Related to Housing Choice Voucher Only, Paragraph 8. Homeownership Program (a) and (b), This authorization waives certain provisions of Section 8(o)(15) and 8(y) of the 1937 Act and 24 C.F.R 982.625 through 982.643 inclusive as necessary to implement the Agency's Annual MTW Plan.

6.1 RESIDENT PROGRAMS

From July 1999 to the date of this Plan, DSHA has funded, partnered, obtained or coordinated annual and ongoing activities, events and programs to enhance the quality of life for our residents. One unit at two sites has been provided for activities due to space and scheduling conflicts in the community buildings at those sites.

- A. Holiday Parties - Each community has appropriate holiday celebrations in which the residents take the lead on planning and organizing the event.
- B. Computer access and instruction for youth and adults – DSHA provides computers with Internet access at all sites. The computer labs are monitored by volunteers from DSHA staff, outside agencies, GED instructors or other non-profit organizations. DSHA purchased an assortment of educational software and board games (funded by Lightspan/Discover) for its sites. The games and software target youth and adults.
- C. Student Award Program for Honor Roll, Perfect Attendance and College Acceptance – Each year DSHA hosts a Student Award Luncheon to recognize students who make the extra effort to succeed. Winners receive a backpack filled with age-appropriate school supplies and are treated to lunch with DSHA’s Director and Management staff. A guest speaker is invited to address the group. This event has been very successful and a positive motivation for the students and parents at our sites.
- D. DSHA has signed MOUs with the Boys and Girls Club of Delaware to provide after-school programs, including pregnancy prevention, at one site. Youth from other sites have access to Boys and Girls Clubs located at facilities nearby. Funding is provided through grants from the Division of Public Health and the United Way.
- E. DSHA has signed an MOU with the University of Delaware to provide 4-H programs at five sites. Services include after-school homework assistance and recreation. DSHA is working with 4-H staff to develop programs for other sites.
- F. DSHA has awarded 151 Scholarships to MTW participants and expects to continue this service from MTW Budget funds.
- G. DSHA signed a Memorandum Of Understanding with James Groves Adult High School to provide Adult Basic Education and GED classes for two communities.
- H. Children and Families First - Provides pregnancy testing, family planning material, STD testing, treatment and counseling; and also organizes resources for grandparents and relatives raising someone else’s children. They currently offer support groups at two sites and are planning to offer Family Enrichment programs at 2-3 additional sites in the fall.
- I. Delmarva Rural Ministries - Provides counseling and treatment for drug and alcohol abuse. Also administers the Mobile Access to Community Health (MATCH) van health program that travels to low-income areas including all DSHA sites, upon request, throughout Kent and Sussex Counties. The MATCH van provides basic health care, screening and referrals as needed.

- J. Even Start - Offers parenting classes to families with children under the age of eight. Activities involve both parent and child(ren) at two sites.
- K. Child, Inc. - Provides one-on-one case management services upon request or referral and offers parenting classes.
- L. Consumer Credit Counseling provides financial counseling and assists with budgeting and establishing credit.
- M. Rental Assistance/Other financial assistance – Peoples Place II and First State Community Action Agency, Catholic Charities, Salvation Army, CASA San Francisco, State Service Centers and local churches.
- N. First State Community Action Agency - Provides limited financial assistance, administers the Summer Food Service Program for Sussex County sites and offers employment training at a center in Georgetown.
- O. Department of Labor - Provides all aspects of employment training, including assistance preparing resumes and applications and improving interviewing skills and workplace training. DSHA serves on the Workforce Investment Board for Delaware. This board administers the state's requirements and initiatives for employment and job training.
- P. Delaware Technical and Community College, Kent County Poly-Tech, Sussex Tech, Delaware State University - All institutions have various courses available for general education as well as specific job training. They require a minimum number of participants to come to DSHA sites, but individuals can go to the schools for classes. Many courses are free of charge, based on income, or have a small fee.
- Q. DSHA has installed GED tutorial software at multiple sites. The program is used by instructors giving group instruction and by residents who study independently.
- R. In a partnership with DSHA's Clarks Corner Public Housing site, Lake Forest School District, University of Delaware Cooperative Extension, Greater Milford Area Boys and Girls Club and Kidz Kottage received a 21st Century Grant of \$335,000 to provide a variety of youth and family programs including educational and social activities. The 4-H Club is actively seeking grants to continue the program.
- S. DSHA participates on the Interagency Council for Adult Literacy. This is a group from various agencies that are working to address literacy issues for Delaware. The group meets regularly and continues to develop and coordinate adult literacy programs for DSHA residents.

DSHA consistently evaluates both the individual families and communities to determine the services and programs that are needed. Additionally, all MTW families are reviewed and assessed quarterly for progress on their RAP. Each year at the recertification, the family prepares a RAP for the next year. These quarterly and annual reviews/contacts enable DSHA to make current, accurate plans and recommendations for appropriate services.

The statistics from the MTW Program are reviewed and evaluated regularly to determine trends, progress, compliance with the Program and to make recommendations for possible changes to MTW.

6.2 HOMEOWNERSHIP PROGRAMS

MTW participants will be able to take advantage of several DSHA Homeownership Programs as they move out of a rental situation and into their first home. The programs include first mortgage financing and down payment assistance at below-market interest rates for both low- and moderate-income borrowers.

DSHA implemented a Resident Homeownership Program (RHP) four (4) years ago. This program allows qualified participants from either the Public Housing or Housing Choice Voucher program to use a Housing Choice Voucher subsidy toward the mortgage for up to 15 years on a first home. To date, four (4) families have successfully purchased homes in the program.

In FY2011, DSHA made changes to the RHP program to reduce the duration of the subsidy from the 15 year period (for non-disabled, non-elderly families), and revise the calculation formula used to determine the amount of voucher assistance. These changes provide a more realistic program for the homeowner as they will be better prepared to assume all responsibility for the mortgage at the end of the subsidy period. Families that currently participate in the RHP program will be grandfathered under the existing subsidy calculation.

DSHA MTW participants, who have established a savings account under the program, have access to those funds for homeownership. Participants must provide verification of moving into non-subsidized housing in order to be eligible for these funds.

6.3 SECURITY

As the Public Housing Drug Elimination Program is no longer available, DSHA is consistently seeking resources to continue security services. Limited funds are available from the MTW Budget and reserves, and lighting upgrades have been completed at two DSHA sites during FY2011. Security cameras have been installed and are operational at three (3) sites. Plans are in place to install cameras at two (2) additional sites, including McLane Gardens and Mifflin Meadows during FY2011. DSHA meets with all local law enforcement agencies to provide some security and to participate in site prevention activities. In addition, DSHA has a "One-Strike" Policy and, through reports received from the police, DSHA tracks arrests made on DSHA properties.

Through strong lease enforcement, DSHA is able to create a standard of pride and care that greatly inhibits drug and criminal activity.

DSHA plans to use funds from CFP to continue extra duty police security, even though funding for the PHDEG has been discontinued. DSHA's Planning and Community Development Section reviews federal, state and foundation requests for proposals that could assist with this need.

6.4 HARSHIP POLICY: MTW PARTICIPANTS

For FY2012, the time-limit for the MTW program will increase from five (5) to seven (7) years, with two levels of participation; MTW Tier I for the first five (5) years and MTW Tier II for the final two (2) years. The Safety-Net program will be eliminated. After the seventh (7th) year of participation, the participant will stop receiving housing assistance. A participant may request that their case be reviewed by a Hardship Panel if they have extenuating circumstances supporting a continuation of housing assistance beyond the seven (7) year period. The three (3) person Hardship Panel will be comprised of one (1) DSHA staff member, one (1) non-DSHA member and one (1) member from another State agency or housing advocate organization. Requests to have cases reviewed by the Hardship panel must be made at least six (6) months prior to the end of participation in the MTW program during the seventh (7th) year. All recommendations made by the Hardship Panel will be forwarded to the Housing Management Program Administrator for review.

Extenuating circumstances that may be considered include:

- Health and/or medical issues;
- Job Availability and/or under-employment issues;
- Past performance of participant and adherence to MTW program requirements;
- Previous participation in DSHA sponsored or referred services and programs;
- Personal initiative of participant in achieving self-sufficiency;
- Other extenuating circumstances.

7.0 Sources and Uses of Funding
Table 13

The combined budget for the MTW program for FY12: \$ 11,807,604

Sources and Uses of Funds

CATEGORY	FY10 ACTUALS	FY11 BUDGET	FY12 BUDGET
Revenue			
Dwelling Rent	\$ 578,674	\$ 540,350	\$ 638,620
Investment Income	29,963	34,360	11,500
Other Income	296,077	336,370	309,250
Operating Subsidy	2,528,406	2,538,332	2,614,480
Capital Funds	356,629	841,644	814,204
Section 8 Subsidies	7,305,985	6,947,900	7,284,220
Total Revenue	\$ 11,095,734	\$ 11,238,956	\$ 11,672,274
Expenses			
Administration	\$ 1,819,949	\$ 1,847,154	1,877,790
Tenant Services	12,853	15,000	15,430
Utilities	472,601	497,690	510,420
Maintenance	1,446,578	1,434,780	1,535,600
Protective Services	0	25,000	30,000
General	627,596	631,320	706,850
Total Routine	\$ 4,379,577	\$ 4,450,944	\$ 4,676,090
Non-Capitalized Expense	46,387	0	0
Capital Outlays	254,090	1,087,300	1,252,784
Payments to Landlords	5,612,118	5,631,190	5,878,730
Total Expenses	\$ 10,292,172	\$ 11,169,434	\$ 11,807,604
Excess/(Deficit)	\$803,562	\$69,522	(\$135,330)

Table 14

The combined budget for the MTW program for FY12: \$ 11,807,604

Sources and Uses of Funds

CATEGORY	FY10 ACTUALS	FY11 BUDGET	FY12 BUDGET
Revenue			
Dwelling Rent - Public Housing	\$ 578,674	\$ 540,350	\$ 638,620
Investment Income			
Public Housing	\$ 11,145	\$ 13,000	\$ 1,500
S8 Vouchers	18,818	21,360	10,000
Total Revenue	<u>29,963</u>	<u>34,360</u>	<u>11,500</u>
Other Income			
Public Housing	\$ 190,381	\$ 227,360	\$ 198,850
Section 8 Voucher	105,696	109,010	110,400
	<u>296,077</u>	<u>336,370</u>	<u>309,250</u>
Operating Subsidy - Public Hsg.	2,528,406	2,538,332	2,614,480
PH Capital Fund	356,629	841,644	814,204
Section 8 Subsidies			
S8 Hsg. Choices Voucher	<u>7,305,985</u>	<u>6,947,900</u>	<u>7,284,220</u>
Total Revenue	<u>\$ 11,095,734</u>	<u>\$ 11,238,956</u>	<u>\$ 11,672,274</u>

Table 15

The combined budget for the MTW program for FY12: \$ 11,807,604

Sources and Uses of Funds

CATEGORY	FY10 ACTUALS		FY11 BUDGET		FY12 BUDGET	
Expenses						
Administration						
	\$					
Public Housing	675,514		\$ 688,300		\$ 678,430	
S8 Hsg. Choices Vouchers	1,063,591		1,078,010		1,117,940	
PH Capital Fund	<u>80,844</u>	\$ 1,819,949	<u>80,844</u>	\$ 1,847,154	<u>81,420</u>	\$ 1,877,790
Tenant Services						
	\$					
Public Housing	12,834		\$ 15,000		\$ 15,430	
S8 Hsg. Choices Vouchers	19		0		0	
PH Capital Fund	<u>0</u>	12,853	<u>0</u>	15,000	<u>0</u>	15,430
Utilities - Public Housing		472,601		497,690		510,420
Maintenance						
Public Housing		1,446,578		1,434,780		1,535,600
Protective Services						
Public Housing			\$ 0		\$ 0	
PH Capital Fund	<u>0</u>	0	<u>25,000</u>	25,000	<u>30,000</u>	30,000
General - Public Housing		627,596		631,320		706,850
Total Routine		\$ 4,379,577		\$ 4,450,944		\$ 4,676,090
Non-Capitalized Expense						
PH Capital Fund		46,387		0		0
Capital Outlays						
Public Housing	\$ 0		\$ 0		\$ 0	
PH Capital Fund	229,398		735,800		702,784	
S8 Hsg. Choices Voucher	<u>24,692</u>	254,090	<u>351,500</u>	1,087,300	<u>550,000</u>	1,252,784
Payments to Landlords						
Resident Home Ownership		0		0	0	
S8 Hsg. Choices Voucher		<u>5,612,118</u>		<u>5,631,190</u>	<u>5,878,730</u>	5,878,730
Total Expenses		\$ 10,292,172		\$ 11,169,434		\$ 11,807,604
Excess/(Deficit)		\$803,562		\$69,522		(\$135,330)

Table 16

Consolidated Budget for the MTW PROGRAM FOR FY12:

\$ 11,807,604

Sources and Uses of Funds

CATEGORY	PUBLIC HOUSING	SECTION 8 HSG CHOICE VOUCHERS	PUBLIC HSG CAPITAL FUND	TOTAL MTW
Revenue				
Dwelling Rent	\$ 638,620	\$ 0	\$ 0	\$ 638,620
Investment Income	1,500	10,000		\$ 11,500
Other Income	198,850	110,400		\$ 309,250
Operating Subsidy	2,614,480			\$ 2,614,480
PH Capital Fund			814,204	\$ 814,204
Section 8 Subsidies		7,284,220		\$ 7,284,220
				\$
Total Revenue	\$ 3,453,450	\$ 7,404,620	\$ 814,204	11,672,274
Expenses				
Administration	\$ 678,430	\$ 1,117,940	\$ 81,420	\$ 1,877,790
Tenant Services	15,430	0		\$ 15,430
Utilities	510,420			\$ 510,420
Maintenance	1,535,600			\$ 1,535,600
Protective Services			30,000	\$ 30,000
General	706,850			\$ 706,850
Total Routine	\$ 3,446,730	\$ 1,117,940	\$ 111,420	\$ 4,676,090
Non-Capitalized Expense	\$ 0	\$ 0	\$ 0	\$ 0
Capital Outlays		550,000	702,784	\$ 1,252,784
Payments to Landlords		5,878,730		\$ 5,878,730
				\$
Total Expenses	\$ 3,446,730	\$ 7,546,670	\$ 814,204	11,807,604
Excess/(Deficit)	<u>\$6,720</u>	<u>(\$142,050)</u>	<u>\$ 0</u>	<u>(\$135,330)</u>
Transfers In / Out	0	0	0	\$ 0
Excess/(Deficit) After Transfers	<u>\$6,720</u>	<u>(\$142,050)</u>	<u>\$0</u>	<u>(\$135,330)</u>

7.0 SOURCES AND USES OF FUNDING

FY11 - BUDGET NARRATIVE

REVENUES

The Agency's MTW budget revenues consist of Dwelling Rent, Investment Income, Other Income, Operating Subsidies, Capital Funds and Section 8 Subsidies. These funding streams, each with their own funding methodologies, are described below.

- o Dwelling Rent. The estimated dwelling rental income was determined by an analysis of November 2010 through January 2011 rent roll (dwelling rent less utility allowances and MTW escrow savings), FY10 actuals and FY11 year-to-date (YTD) income. The lowest dwelling rental income for that period was 104.76 PUM. The FY12 dwelling rental income is estimated at \$638,620 (508 units multiplied by 104.76 PUM multiplied by 12 months). This amount is higher than FY10 actuals of \$578,674 and the FY11 budgeted amount of \$540,350 due to higher PUM costs and an increase in Public Housing minimum rent from \$25 to \$50 effective 1/1/2011.
- o Investment Income. After examining the Appropriations and Money Market balances, interest earned in FY10 and FY11 YTD, an estimated FY12 investment income (EI) was established based on a reduced operating reserve balances and current interest rates. This amount is lower than the FY11 budgeted amount due to a drop in interest rates to 0.10%.
- o Other Income. Daycare centers in the community buildings of Laverty Lane and Hickory Tree generate monthly income in the amount of \$700 and \$750 respectively as well as the community building at Holly Square generating \$1,250 a month in income. Public Housing laundry machines are supplied by a vendor and the Authority receives 50% of the revenue generated. DSHA also receives a small percentage of telephone receipts. Also included in other income are maintenance charges, court fees, late fees received from residents and MTW savings forfeitures. Savings forfeitures for the period July 2010 through December 2010 were \$38,723.

Section 8 Housing Choice Vouchers receives other income from fraud recovery payments and forfeitures of MTW Escrow savings. Savings forfeitures for the period July 2010 through December 2010 were \$50,492. The forecast for other income was derived from FY11 YTD annualized receipts.

- o Operating Subsidies. The agency receives an operating subsidy for its Public Housing units that is calculated in two parts: utility and non-utility. The amount of non-utility subsidy is determined by the per unit non-utility subsidy that the agency received in the prior year. This figure is then adjusted annually for inflation. The agency receives a subsidy equal to the utility consumption, on a three year rolling base, that was in place for the MTW base year (FY99) and is then adjusted by current utility rates. The budgeted subsidy amount used for FY12 is DSHA's Approved CY10 subsidy amount of \$2,752,088 reduced to a proration of 95% resulting in the \$2,614,480 budgeted.
- o Modernization/Capital Fund. Typically, an agency receives a proportionate share of the national appropriation for modernization based on its "formula factor", a figure that considers the agency's needs relative to the nation as a whole. Under MTW, this formula factor is, for all practical purposes, frozen during the demonstration period, regardless of any changes in the agency's Public Housing stock.

In accordance with new guidelines under GAAP, the income reported as budgeted to be received from the Public Housing Capital Fund is the expense amount that the agency actually anticipates incurring in all prior-year funds, not necessarily the amount that the agency anticipates being awarded in new funds in FY12, which often takes up to three years to expend. Please see Capital Fund "Awarded Budget" as shown in Section 2.0 of this Plan.

- o Section 8 Housing Choice Voucher. The amount of funding that the agency received in prior years was a function of the average monthly subsidy paid for each Section 8 Existing and/or Voucher unit in the year before MTW. This figure was then adjusted annually from MTW year two forward, for inflation and multiplied by the number of Section 8 Vouchers (under MTW, all contracts are called vouchers) units per original ACC contracts (905 units), and again by 12 months, to determine the annual Section 8 Block Grant. However, starting in January 2005, Section 8 Voucher funding is being awarded by calendar year. The CY11 funding is estimated to be \$7,667,600. A 95% proration was used to estimate the Grant for FY12 at \$7,284,220.

While the amount of funding is calculated separately, the agency can use the above funds flexibly. The agency uses an in-house A/P system for accounting purposes, effective July 1, 2010. All MTW funds are held in Wilmington Trust Money Market accounts, collateralized or covered by FDIC insurance.

EXPENDITURES

MTW program expenses for FY12 consists of Administration Expense, Tenant Services, Utilities, Maintenance, Protective Service, General Expense, Non-Capitalize Expense, Capital Outlays and Payments to Landlords. Expenses are calculated after reviewing prior years expense levels plus an inflation factor and adding any new contractual obligations. A broad overview by Program is listed below.

- o Administration Expense. Public Housing, Section 8 and Capital Funds Program include salaries, legal, staff training/travel, CFP administrative fees, auditing fees, supplies, postage where appropriate. The small increase in this year's budget anticipates inflated costs.
- o Tenant Services. Public Housing expenses include education and recreational activities for children, Internet access at all sites, and \$4,170 to fund organized tenant councils. Expenses formerly paid by the Resident Services Assistance Grant including scholarship opportunities for residents have been moved to this line.
- o Utilities. The expense for lighting, heating and providing water and sewer to all sites was based on inflated FY10 Actual expenses.
- o Maintenance. Maintenance salaries of site personnel, which does not include a salary increase for FY12, building materials, supplies, and contractual costs including trash pickup, grass cutting, exterminating and routine painting of empty units at all sites are combined in this category.
- o Protective Service. State Police and Local Policing authorities provide after hours protection to targeted Public Housing sites as a deterrent to criminal activity. Due to the elimination of the Drug Elimination Grant and Budgetary constraints within the Public Housing Program, these costs will be covered in FY12 by the Capital Fund Program (\$30,000). In FY12, installation of Security Cameras at Lavery Lane and Hickory Tree will be funded by the Capital Fund Program.
- o General Expense. Grouped in this area are payments in lieu of taxes to counties and school districts, insurance coverage costs, benefit contributions for administrative and maintenance employees and any loss on collections.
- o Non-Capitalized Expense. Represents expenses incurred by the Capital Fund Program for cyclical painting, building maintenance/repairs, land/site improvements, appliance installation/repair, community equipment, maintenance equipment, and grounds maintenance at all Public Housing sites which are under the capitalization threshold of \$100,000.
- o Capital Outlays. The Capital Fund Program expends funds for general equipment, air conditioning/heating upgrades, land improvements and building/ground improvements at Public Housing sites in excess of the Fixed Asset threshold. In FY12, security cameras at Lavery Lane and Hickory Tree are planned. The Housing Choice Voucher Program will fund the bathroom renovations at Lavery Lane.

- o Payments to Landlords. The Section 8 payments to landlords in the amount of \$5,878,730 reflects an increase over the FY11 budgeted amount and includes payments for four Resident Home ownership Program Participants. This program's first expenditures were recognized in FY07.

EXCESS/(DEFICIT)

Public Housing. An increase in operating reserves in the amount of \$6,720 is expected for FY12 and could be smaller or greater once final pro-ration figures are established.

Section 8 Housing Choice Vouchers. A decrease in reserves of \$142,050 is expected for FY12 which takes in account the use of Housing Choice Voucher funds to complete one Public Housing Capital Project.

OPERATING RESERVES

The increase in Operating Reserves for Public Housing and Housing Choice Vouchers shown in FY10 actuals are supported by documentation submitted with the FY10 Annual Report dated September 28, 2010.

The increase to Operating Reserves for Public Housing and the increase to Operating Reserves for Housing Choice Vouchers shown in FY11 (Projections) were derived by projecting FY11 actuals thru December 31, 2010.

The \$6,720 increase in Public Housing Operating Reserves and the decrease of \$142,050 for the Housing Choice Voucher Program for FY12 is supported by the attached documentation including the Consolidated Budget for the FY12 MTW Program, the Sources and Uses of Funds, the Detailed Sources and Uses of Funds by Revenue and the Detailed Sources And Uses of Funds by Expenditure.

The projected FY12 year end Operating Reserve balance for Public Housing is \$695,341 and the projected Operating Reserve balance for the Housing Choice Voucher Program is \$2,166,424 which results in a combined MTW Operating Reserve Balance of \$2,861,765. This amount represents a little over three months of total MTW expenses. This is about the same as the FY10 year end which also would support a little over three months of expenses.

ASSET MANAGEMENT & FEE FOR SERVICE

DSHA follows up HUD's local asset management program and has no deviations from HUD's asset management requirements. DSHA uses the fee for service approach for the Capital Fund Program. For Public Housing and Section 8 Voucher programs, DSHA direct charges salaries and expenses to the appropriate program for which the expense is related. DSHA also uses MTW funding fungibility to move charges to other programs as needed. DSHA does not charge overhead to each program in order to leave program funds within the program in order to support the program. DSHA's mortgage revenue bond programs support the majority of general fund operations, such as central office building maintenance and utilities, through transfers of administrative fees and surplus funds. This keeps most federal funds within the program to support the program.

SINGLE BUDGET FLEXIBILITY

In addition to the use of MTW funding fungibility, as noted above, DSHA has used single budget flexibility to complete projects at public housing site using Housing Choice Voucher reserves. For FY2011 this has included engineering expenses for the replacement of Heating/Air conditioning and water heater replacements at Holly Square Apartments, partial payment of expenses for security cameras to be installed at Mifflin Meadows and McLane Gardens, and the installation of a new playground, bike trail and basketball court at Mifflin Meadows. In past years, the single budget flexibility has also been used to offset cuts in public housing operating funds when needed.

Table 17
OPERATING RESERVES

FY10 (Actuals)			FY11 (Projections based on FY11 YTD)				FY12 (Projected)			
Increase/ Decrease	Transfers In/Out	End of Year	Beginning of Year	Increase/ Decrease	Transfers To/From	End of Year	Beginning of Year	Increase/ Decrease	Transfers To/From	End of Year
\$73,483	\$0	\$611,485	\$ 611,485	\$77,136	\$0	\$688,621	\$688,621	\$6,720	\$0	\$695,341
730,079	0	2,293,174	2,293,174	15,300	0	\$2,308,474	2,308,474	(\$142,050)	\$0	2,166,424
\$803,562	\$0	\$ 2,904,659	\$ 2,904,659	\$92,436	\$0	\$ 2,997,095	\$ 2,997,095	(\$135,330)	\$0	\$2,861,765

8.0 ADMINISTRATIVE

- **Resolution signed by the Director adopting the Annual Plan Certification of Compliance:**

See Attachment C for General Order and Certification

- **Descriptions of any planned or on-going Agency-directed evaluations of the demonstration, as applicable; and**

A resident satisfaction survey has been developed and will be sent to Public Housing residents every year.

- **ANNUAL STATEMENT/PERFORMANCE AND EVALUATION REPORT (HUD 50075.1)**

PUBLIC HEARING NOTICE
ON THE FY2012 MOVING TO WORK ANNUAL PLAN

Notice is given that the Delaware State Housing Authority (DSHA) will conduct two Public Hearings concerning the submission of their Moving To Work Annual Plan for FY2012 to the U.S. Department of Housing and Urban Development (HUD). This Plan outlines the activities of the Moving To Work Program as well as the sources and uses of funding that DSHA will implement during the thirteenth year of the Moving To Work Demonstration.

In addition, proposed changes to the Resident Selection Criteria, specifically the Criminal Screening Process for new applicants will be discussed.

A copy of the Plan will be available for inspection and review at DSHA's offices during normal business hours, Monday through Friday, at 18 The Green, Dover and each Public Housing development beginning March 25, 2011. The Plan will also be available on the DSHA website, www.destatehousing.com beginning March 25, 2011. After the end of the comment period on May 13, 2011, the Plan will be finalized and submitted to HUD for final approval.

The first hearing will be held in the Community Building of the Liberty Court complex at 6:00 P.M., Wednesday, April 27, 2011. Liberty Court is located at 1289 W. Walker Road, Dover, DE 19904. The Community Building is handicapped accessible.

The second hearing will be held in the Community Building of the Burton Village complex at 6:00 P.M., Thursday, April 28, 2011. Burton Village is located at 100 Burton Village, Rehoboth Beach, DE 19971. The Community Building is handicapped accessible.

Written comments, questions or requests for additional information, including copies of the Plan itself, should be directed to Christopher A. Whaley of DSHA at (302) 739-7419.

Delaware State Housing Authority
Telephone (302) 739-7419
TDD (302) 739-4264
Equal Opportunity Employer
Equal Housing Opportunity

IMPORTANT RESIDENT NOTICE

PUBLIC HEARING NOTICE ON THE FY2012 MOVING TO WORK ANNUAL PLAN

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The most significant change noted in the FY2012 MTW Annual Plan includes extending the MTW program from five (5) years to seven (7) years, with the elimination of the Safety Net option for current and future participants. Individuals in the first five (5) years of the program will become MTW Tier I participants, and those in the remaining two (2) years of the program will become MTW Tier II participants. Under the revised MTW program, participants will receive case management during the full seven (7) year period. Current Safety-Net participants will be re-integrated into the MTW Program as MTW Tier II participants. The term of housing assistance will be limited to seven (7) years, unless an exemption is given through application to a three (3) member Hardship Panel. Because of this change, all current MTW participants and Safety-Net participants are strongly encouraged to attend one of the hearings listed below.

IF YOU ARE CURRENTLY EXEMPT FROM THE MTW PROGRAM (ELDERLY AND/OR DISABLED INDIVIDUALS OR FAMILIES), THE PROPOSED CHANGES TO THE MTW PROGRAM WILL NOT AFFECT YOU.

In addition, proposed changes to the Resident Selection Criteria, specifically the Criminal Screening Process for new applicants will be discussed.

A copy of the Plan will be available for inspection and review at DSHA's offices during normal business hours, Monday through Friday, at 18 The Green, Dover, DE 19901 and at each Public Housing development beginning March 25, 2011. The Plan will also be available on the DSHA website, www.destatehousing.com beginning March 25, 2011. After the end of the comment period on May 13, 2011, the Plan will be finalized and submitted to HUD for final approval.

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**SUMMARY OF COMMENTS
FOR DELAWARE STATE HOUSING AUTHORITY'S
MOVING TO WORK FY2012 ANNUAL PLAN
PUBLIC HEARING AT LIBERTY COURT
APRIL 27, 2011**

The hearing convened at 6:00 p.m. with Christopher A. Whaley, Housing Management Program Administrator, presiding. He started by explaining that the purpose of the hearing was to provide interested parties with an opportunity to present questions and/or comments regarding the FY2012 Moving To Work Annual Plan before it is submitted to the U. S. Department of Housing and Urban Development (HUD) for final approval. The Plan begins July 1, 2011 and ends June 30, 2012.

Chris Whaley discussed the details of the MTW Program, limitations and proposed changes to the MTW Annual Plan for FY2012. Major proposed changes to the MTW Program include:

1. DSHA will increase the time limit for the MTW Program from five to seven years, with the elimination of the Safety Net Program. Under the revised Program, there will be two tiers of participation. MTW Tier I will be for the initial five (5) years and MTW Tier II for the final two (2) years. Tier I participants will receive case management services with an emphasis on overcoming barriers to self-sufficiency, education, financial literacy, and increasing their potential earning income and employability. A special case assessment will be conducted for all MTW participants who do not complete the program in year five (5). The assessment will be conducted by the case manager and reviewed by the Social Service Senior Administrator before the participant begins the MTW Tier II level. Tier II participants will continue to receive case management services during the final two (2) years of the program, but with an emphasis on job placement and retention and becoming ready to move out of subsidized housing by year seven (7). After the seventh (7th) year of participation, the family will stop receiving housing assistance. A participant may request that their case be reviewed by the Hardship Panel if they have extenuating circumstances supporting a continuation of housing assistance beyond the seven (7) year period.
2. All families currently in the Safety-Net, about 125 people, will be integrated into the MTW program as Tier II participants and will be provided with case management (as noted above) to help them prepare to move into other forms of non-DSHA housing. Starting effective July 1, 2011, these existing residents will be given one (1) year from the date of their next annual recertification to complete the revised MTW Tier II program. After the end of this period, the family will stop receiving housing assistance. A participant may request that their case be reviewed by the Hardship Panel if they have extenuating circumstances supporting a continuation of housing assistance beyond the seven (7) year period.
3. For FY2012, The MTW Savings Account will be expanded to include individuals in years 6 and 7 of the program. For participants that successfully complete the program before or in the fifth (5th) year of participation (under MTW Tier I), they will be eligible to utilize 100% of their MTW savings account. Contributions to the MTW Savings will stop after the 5th year. For participants in their sixth (6th) and seventh (7th) year of the MTW Program (under the MTW Tier II), they will have access to 60% of MTW Savings in year six and 40% of MTW Savings in year 7. Successful MTW clients will be required to utilize at least 60% of the savings fund for homeownership/fair market rental related expenses. This includes: down payment, closing costs, security deposits, utility deposits, clearing credit issues and satisfying debt for medical bills, education and transportation. The remaining 40% of the MTW savings will be distributed to the client for discretionary use. If a client does not successfully complete the MTW Program, all savings account funds will be forfeited.

4. DSHA is reviewing the current guidelines for the criminal background check pertaining to the standards for admission. The proposed changes include information regarding convictions, release dates and parole. Currently, the ineligibility time frame begins at the arrest/conviction date. The new proposal would suggest the time frame begin upon satisfaction of the obligations of the sentence imposed.

Questions, comments and concerns from the public include:

1. Concerns were raised about the state of the economy and the availability of jobs. Mr. Whaley acknowledged the resident's concerns and assured them that the agency was taking steps to offer assistance to residents regarding the job market in the current economic situation. Mr. Whaley also mentioned that DSHA was working in connection with other state agencies and local educational institutions to assist our residents.
2. Questions were raised about temporary and permanent disabilities. Mr. Whaley reiterated the information provided regarding the exemption for elderly and disabled. Rebecca Kauffman also touched briefly on the disability issue.
3. Inquiries were made regarding the time frame of the changes to the Program. Mr. Whaley stated the proposed changes are sent to HUD and will begin upon approval.
4. One resident expressed apprehension regarding the success rate of the Department of Labor and Social Services in assistance with job placement.
5. An inquiry was made regarding portability to other states. Mr. Whaley discussed eligibility rules for portability.
6. Concerns were raised and addressed regarding waiting lists for Tax Credit housing.
7. A resident expressed concern regarding the on-line courses satisfying the educational requirements. Rebecca Kauffman explained that educational institutions may provide verification of educational requirements to satisfy the expectations of the program.
8. Ms. Gina Miserendino from the Housing Coalition voiced her concerns about the general state of the economy and its effect on affordable housing. Additional concerns were also expressed about the decrease in PELL Grants and the effect it will have on education for residents. Ms. Miserendino said that she would submit her comments in writing.
9. Several residents agreed with the need for a change in the Program, but expressed concerns about the timing in the current state of the economy.
10. Comments and concerns were expressed regarding the requirements for volunteerism when under multiple programs and as an educational requirement.
11. A variety of questions regarding such items as homeownership, credit repair, Grants and loans were asked that were unrelated to the MTW Plan and they were directed to discuss those matters with their case manager.
12. Ms. Miserendino raised the question as to whether SURJ (Stand up for what's Right and Just) and other housing organizations were aware of the proposed changes in the criminal screening process. No negative questions or comments were raised regarding the proposed changes.

Mr. Whaley reminded attendees that another hearing would be held tomorrow night at Burton Village in Rehoboth Beach. He welcomed any additional comments concerning the Plan and provided contact information to residents and guests. They were encouraged to contact Mr. Whaley with any additional concerns or questions.

There were no further questions or comments, and the hearing was adjourned at 7:15 p.m.

**SUMMARY OF COMMENTS
FOR DELAWARE STATE HOUSING AUTHORITY'S
MOVING TO WORK FY2012 ANNUAL PLAN
PUBLIC HEARING AT BURTON VILLAGE
APRIL 28, 2011**

The hearing convened at 6:00 p.m. with Christopher A. Whaley, Housing Management Program Administrator, presiding. He started by explaining that the purpose of the hearing was to provide interested parties with an opportunity to present questions and/or comments regarding the FY2012 Moving To Work Annual Plan before it is submitted to the U. S. Department of Housing and Urban Development (HUD) for final approval. The Plan begins July 1, 2011 and ends June 30, 2012.

Chris Whaley discussed the details of the MTW Program, limitations and proposed changes to the MTW Annual Plan for FY2012. Major proposed changes to the MTW Program include:

1. DSHA will increase the time limit for the MTW Program from five to seven years, with the elimination of the Safety Net Program. Under the revised Program, there will be two tiers of participation. MTW Tier I will be for the initial five (5) years and MTW Tier II for the final two (2) years. Tier I participants will receive case management services with an emphasis on overcoming barriers to self-sufficiency, education, financial literacy, and increasing their potential earning income and employability. A special case assessment will be conducted for all MTW participants who do not complete the program in year five (5). The assessment will be conducted by the case manager and reviewed by the Social Service Senior Administrator before the participant begins the MTW Tier II level. Tier II participants will continue to receive case management services during the final two (2) years of the program, but with an emphasis on job placement and retention and becoming ready to move out of subsidized housing by year seven (7). After the seventh (7th) year of participation, the family will stop receiving housing assistance. A participant may request that their case be reviewed by the Hardship Panel if they have extenuating circumstances supporting a continuation of housing assistance beyond the seven (7) year period.
2. All families currently in the Safety-Net, about 125 people, will be integrated into the MTW program as Tier II participants and will be provided with case management (as noted above) to help them prepare to move into other forms of non-DSHA housing. Starting effective July 1, 2011, these existing residents will be given one (1) year from the date of their next annual recertification to complete the revised MTW Tier II program. After the end of this period, the family will stop receiving housing assistance. A participant may request that their case be reviewed by the Hardship Panel if they have extenuating circumstances supporting a continuation of housing assistance beyond the seven (7) year period.
3. For FY2012, The MTW Savings Account will be expanded to include individuals in years 6 and 7 of the program. For participants that successfully complete the program before or in the fifth (5th) year of participation (under MTW Tier I), they will be eligible to utilize 100% of their MTW savings account. Contributions to the MTW Savings will stop after the 5th year. For participants in their sixth (6th) and seventh (7th) year of the MTW Program (under the MTW Tier II), they will have access to 60% of MTW Savings in year six and 40% of MTW Savings in year 7. Successful MTW clients will be required to utilize at least 60% of the savings fund for homeownership/fair market rental related expenses. This includes: down payment, closing costs, security deposits, utility deposits, clearing credit issues and satisfying debt for medical bills, education and transportation. The remaining 40% of the MTW savings will be distributed to the client for discretionary use. If a client does not successfully complete the MTW Program, all savings account funds will be forfeited.

4. DSHA is reviewing the current guidelines for the criminal background check pertaining to the standards for admission. The proposed changes include information regarding convictions, release dates and parole. Currently, the ineligibility time frame begins at the arrest/conviction date. The new proposal would suggest the time frame begin upon satisfaction of the obligations of the sentence imposed.

Questions, comments and concerns from the public include:

1. A resident expressed concern about the lack of funds she has been able to save in her escrow account.
2. Concerns were raised about the difficulty to find employment and how it would affect the ability to pay the high rents in Fair Market housing. Mr. Whaley recapped DSHA's work with other agencies, such as NCALL, to assist our residents with finding affordable housing.
3. A resident spoke of her fear of becoming homeless without housing assistance. Mr. Whaley reminded her that her case could be reviewed by the Hardship Panel if she has extenuating circumstances supporting a continuation of housing assistance beyond the seven (7) year period.
4. The residents were encouraged by both Mr. Whaley and Ms. Kauffman to begin planning now for future housing, such as Rural Development, first time homeownership, or other subsidized housing, as was previously presented in the above proposed changes.
5. A variety of questions regarding such items as homeownership, credit repair, Grants and loans were asked that were unrelated to the MTW Plan and they were directed to discuss those matters with their case manager.
6. No negative questions or concerns were raised regarding the proposed change in the criminal screening process.

Mr. Whaley welcomed any additional comments concerning the Plan and provided contact information to residents and guests. They were encouraged to contact Mr. Whaley with any additional concerns or questions.

There were no further questions or comments, and the hearing was adjourned at 6:50 p.m.



Delaware Housing Coalition

P.O. Box 1633 • Dover, DE 19903-1633
(302) 678-2286 • FAX (302) 678-8645
www.housingforall.org
www.whynimby.org

May 12, 2011

Anas Ben Addi, Director
Delaware State Housing Authority
18 The Green
Dover, DE 19904

Subject: DELAWARE HOUSING COALITION COMMENTS ON MOVING TO WORK (MTW) PROGRAM

Dear Director Ben Addi:

The Delaware Housing Coalition (DHC) is submitting comments on the FY2012 Moving to Work Annual Plan of the Delaware State Housing Authority (DSHA). We hope that you find them constructive. Our overall attitude toward the program continues to be one of critical concern as we see residents and DSHA unable to overcome the very conditions that make affordable housing an imperative.

DHC opposed the initial concept and implementation of the Moving to Work (MTW) Demonstration Program in the Delaware State Housing Authority. We were concerned about the constraints posed by employment, transportation, and housing conditions, as well as the largely rural area covered by DSHA in its role as a public housing authority. We believed that it would be difficult for the program to live up to its name, "Moving to Work," and would place an unreasonable burden on participating residents. Being patterned after the state's early "welfare reform" program known as "A Better Chance," MTW also seemed overly punitive in character.

Goals of Moving to Work

Of the three statutory goals of MTW, DSHA has always done well at achieving the first (reducing costs and achieving greater cost benefits). The second (incentives to obtain employment and become economically self sufficient) and third objectives (increasing housing choices for low-income families) are the ones over which DSHA, on a programmatic level, and its residents, in their own lives, have least control. They have understandably proven much more intractable.

Safety Net

The addition of two tiers, the change in time limits from five to seven years, and the ending of the safety net, means the program will serve more families, with more current residents participating, and more families passing through the program over time. The question is how well they will be served. To avoid making this a program that unnecessarily drives stably housed families back into

Board of Directors

Karen Curtis	Sarah Keifer	Dorothy Medeiros	Brenda Osborne	Van Temple
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precarious housing or homelessness, it is incumbent upon DSHA to work creatively, dedicating more of its housing finance agency-side resources to materially increase housing opportunities.

Employment and Housing

The minimum wage and real wages in general have trended downward over many years. Neither public policy nor new job creation promise to change this picture anytime soon. Taking this as given, and looking at a resident population that is predominantly extremely low-income (ELI), DSHA has two separate and mutually conflicting issues that are joined and accentuated via MTW. One is that people need long-term, stable, decent, affordable housing, regardless of income. The other is the MTW program imperative to move more people through the program and have an acceptable rate of success.

A recent HUD report to Congress suggests that the Moving to Work Program nationally fails to deliver on a key statutory goal to “increase housing choices for low income families”^a Even the three jurisdictions which reported increased housing choices had a mixed record of doing so. HUD reports that the provision of rental housing assistance reduces the incidence of Worst Case Housing Needs. The results showed that for every 100 assisted units added to the market; the number of worst case needs is reduced by 94 households.^b

The Delaware Department of Labor research shows that between 2008 and 2018, eight of the ten occupations projected to have the most annual openings fall into the “low” wage category (\leq \$28,000); one falls into the below-average wage category (\$28,800-\$36,800) and the other into high wage grouping (\geq \$66,301). Eight of these nine occupations require only short term on-the-job training which have an average annual salary of \$25,068, with one falling within the below-average category and requiring moderate-term on-the-job training; garnering an annual average salary of \$34,817).^c Further, it is projected that 53% of all jobs created by 2018 will only require on-the-job training which therefore will have limited income potential. Except for nursing and customer service representatives, none of these occupations pay the housing wage^d for either Kent or Sussex County. The Delaware Basic Economic Security Table™ (DE BEST)^e, 2009 shows that one worker (no children) with employment-based benefits in Kent County needs to earn \$13.47/hour (\$28,656 yearly); that same worker without employment-based benefits needs to earn \$16.04/hour (\$33,876 yearly) in order to cover basic expenses and create modest savings.

DSHA is contemplating changes to its qualified application process (QAP) for the low-income housing tax credit program (LIHTC). In line with the DHC Fair Share Measure, the DSHA priority on “communities of opportunity,” and the emphasis on impacted census tracts in the new Analysis of Impediments for Fair Housing Choice, DSHA should look at ways to guarantee additional use of that program by ELI households, with special attention to persons with disabilities.

Disabled and Elderly Households

Similarly, we wonder what an optimum concentration of elderly and disabled households is and whether there are ways to create additional housing opportunities through the LIHTC, for example, that allow more of these residents greater housing choice and life opportunity. This would be mutually beneficial to those groups and to DSHA in its attempts to add working households to its program.

^a Department of Housing and Urban Development, Report to Congress, Moving to Work: Interim Policy Applications and the Future of the Demonstration at 3 (2010)

^b <http://nlihc.org/doc/Memo16-16.pdf>

^c Delaware 2018 Occupation and Industry Projections. October 2010

^d \$15.62 for Kent and \$14.42 for Sussex, www.nlihc.org

^e http://www.ywca.org/atf/cf/%7BC6E71D4C-B1EA-4139-BE77-927BEED33026%7D/Delaware_BEST_Final_11_2010.pdf

Program Features

The three-strike policy was brought over wholesale from the “A Better Chance” program when MTW was implemented and seems an unnecessarily aversive element that is often counterproductive of encouraging a resident to gain independence and self-confidence. At times, we think it has been used unfairly.

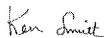
We believe that resident participation and influence has many advantages. The FY 2011 draft annual plan stated that \$4,170 will be set aside to fund organized resident councils. It would be good for DSHA to report on how it has been utilized and what obstacles might have prevented its utilization. We have made many previous comments regarding the need for, and benefits of, resident input and participation. An official, interactive process featuring regular, ongoing communication with, and serious consideration of, tenants’ perspectives would enhance significantly and legitimize this program in the spirit of the QHWRA regulations.

We also, again, emphasize our concerns about the standards, professional qualifications, and resources required for the integral case management component. With the stakes becoming even higher for the resident participants, it is vital that case managers be professionally prepared and possess personal communication skills to adequately assist residents. In the past we have observed very high client-to-worker ratios, considerable staff turnover, different standards at different sites, inconsistent resources, and mixed, confusing roles between case manager and property manager. We ask, with the pressure on residents to take whatever work is available at whatever hours, how much flexibility is built into the case management process. We have seen DSHA advertise for case managers stipulating an associate’s degree as a minimum requirement. DHC does not consider a two-year degree adequate preparation for this job. As DSHA considers how best to maintain 500 families in MTW, we recommend a thorough review, in collaboration with the School of Social Work at Delaware State University, of the academic and experiential requirements and communications skills that persons serving as case workers role must have. Guidance from the School should also include overall program design, assessment of the first ten years, ongoing review and supervision, and case management evaluation.

Conclusion

DHC understands that DSHA faces enormous challenges in effectively and efficiently operating the publicly-assisted housing programs. DHC and DSHA have documented the need throughout the state for affordable housing. We work cooperatively together in many ways to address the need. It remains our view that the Safety Net should be considered as a viable and indispensable part of any publicly-assisted housing program, especially MTW. Time limits “weaken the powerful impact that rental assistance has in homelessness prevention and on housing instability.”^f To pursue the course outlined in the current draft plan, the onus falls upon DSHA to create more housing opportunities to which residents can “graduate.” Recognizing that there are many still in need of affordable, decent housing, we object to displacing residents for program purposes without the creation of new housing opportunities.

Kind regards,



Ken Smith, Director

^f Will Fischer, Center on Budget and Policy Priorities

DELAWARE COAST PRESS

P.O. BOX 309
REHOBOTH BEACH, DE 19971
PHONE: (302) 537-1881
FAX: (302) 537-9630

Delaware State Housing Authority
26 The Green
Dover, DE 19901

To Whom It May Concern:

Here is the Certificate of Publication for your ad that was run on 4/6/11 & 4/20/11

Sincerely,

Katherine Brown
Legal Classifieds, ext. 116

CERTIFICATE OF PUBLICATION

This is to certify that the attached has been published in The Delaware Coast Press, a weekly paper of general circulation in Sussex County, published in Rehoboth Beach, Delaware,

Moving To Work Annual Plan

on the following dates:

April 6, 2011
April 20, 2011

Delaware Coast Press
A Gannett Publication

**PUBLIC HEARING NOTICE ON THE FY 2012
MOVING TO WORK ANNUAL PLAN**

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Delaware State Housing Authority
Telephone (302) 739-7419 TDD (302) 739-4264
Equal Opportunity Employer Equal Housing Opportunity
dcp 4/6/2t 535540

GATEHOUSE MEDIA DELAWARE HOLDINGS, INC

Office:

1196 S. Little Creek Rd.,
Dover, DE 19901
(302) 678-3616

Mailing Address:

P.O. Box 664
Dover, DE 19903

**Delaware State Housing Authority
26 The Green
Dover, DE 19901**

This is to certify that the following classified advertisement:

**Public Hearing Notice: On The FY2012 Moving
To Work Annual Plan**

was carried in The Dover Post, a weekly newspaper, on
the following dates:

March 23rd, 30th, April 6th & 13th, 2011

A copy of that advertisement is attached.



For The Dover Post

Sworn to and subscribed before me this 13th
Day of April, 2011.



Notary Public

Notary Public

INVOICE:

TOTAL DUE: \$127.20

Thank you



GATEHOUSE MEDIA DELAWARE HOLDINGS, INC

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Dover, DE 19901
(302) 678-3616

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**Delaware State Housing Authority
26 The Green
Dover, DE 19901**

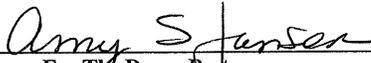
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Notary Public

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Thank you

of that activity.

PUBLIC HEARING

**PUBLIC HEARING NOTICE
ON THE FY2012 MOVING TO
WORK ANNUAL PLAN**

Notice is given that the Delaware State Housing Authority (DSHA) will conduct two Public Hearings concerning the submission of their Moving To Work Annual Plan for FY2012 to the U.S. Department of Housing and Urban Development (HUD). This Plan outlines the activities of the Moving To Work Program as well as the sources and uses of funding that DSHA will implement during the thirteenth year of the Moving To Work Demonstration. In addition, proposed changes to the Resident Selection Criteria, specifically the Criminal Screening Process for new applicants will be discussed.

A copy of the Plan will be available for inspection and review at DSHA's offices during normal business hours, Monday through Friday, at 18 The Green, Dover and each Public Housing development beginning March 25, 2011. The Plan will also be available on the DSHA website, www.destatehousing.com beginning March 25, 2011. After the end of the comment period on May 13, 2011, the Plan will be finalized and submitted to HUD for final approval.

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Written comments, questions or requests for additional information, including copies of the Plan itself, should be directed to Christopher A. Whaley of DSHA at (302) 739-7419.

Delaware State Housing
Authority
Telephone (302) 739-7419
TDD (302) 739-4264
Equal Opportunity Employer
Equal Housing Opportunity

3/23, 3/30, 4/6, 4/13/2011
4263190

GATEHOUSE MEDIA DELAWARE HOLDINGS INC.

Office:
Smyrna/Clayton Sun-Times
224 E. Glenwood Ave.
Smyrna, DE 19977

Delaware State Housing Authority
Attn: Christopher Whaley
26 The Green
Dover, DE 19901

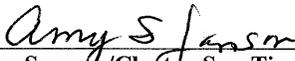
This is to certify that the following legal advertisement:

Public Hearing and Community Meeting Notice on Moving to Work Annual Plan

was carried in the Smyrna/Clayton Sun-Times, a weekly newspaper, on the following date(s):

March 30, April 6, and 13, 2011

A copy of that advertisement is attached.



For the Smyrna/Clayton Sun-Times

Sworn to and subscribed before me this 13th
day of April, 2011.



Notary Public




GateHouse Media™
Delaware

DELAWARE STATE HOUSING AUTHORITY/LEGAL
 26 THE GREEN
 DOVER DE 19901
 (302)739-7419

Account: 164890
Ad Number: 4264660
Source: ST
Size: 3 X 6
Sales Rep: Brigitte McKinney

<i>Cost of Ad</i>	<i>Payments</i>	<i>Total Due</i>
205.80	0.00	205.80
<i>Class:</i> INT INTERNET		<i>SubClass:</i>
<i>Description:</i> Annual Plan		
ST - Sun Times - 204	Mar 30 Apr 6,13	
Online Conversion ST	Mar 30 Apr 6,13	

AD MAKEUP NOTES

ad copy uploaded to presteligenca

**PUBLIC HEARING AND
COMMUNITY MEETING NOTICE
ON MOVING TO WORK ANNUAL PLAN**

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**Delaware State Housing Authority
Telephone (302) 739-7419
TDD (302) 739-4264
Equal Opportunity Employer
Equal Housing Opportunity**

Street Address:
950 West Basin Road
New Castle, DE 19720

Mailing Address:
P.O. Box 15505
Wilmington, DE 19850

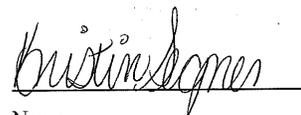
(302) 324-2500
(800) 235-9100

AFFIDAVIT OF PUBLICATION

State of Delaware

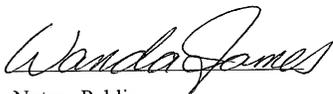
Personally appeared before me this 20th day of April, 2011.

I, Kristin Segner, of The News Journal Company, a daily newspaper printed and published in the County of New Castle County, State of Delaware, who, being duly sworn states that the advertisement of Delaware State Housing Authority – PUBLIC HEARING NOTICE ON THE FY2012 MOVING TO WORK ANNUAL PLAN was published in The News Journal on March 26,27,30; April 2,3,6,9,10,13,17,20, 2011


Name

Legal Coordinator
Title

Sworn to before me this 20th day of April, 2011


Notary Public

Wanda James
Notary Public
State of Delaware
Commission expires 11/02/2012

Fax Numbers:
Accounting: 324-2554
Circulation: 324-2945
Classified: 324-5511
Human Resources: 324-2578
Info Systems: 324-2969
Marketing: 324-2557
News: 324-5509
Retail: 324-5518



**PUBLIC HEARING
NOTICE
ON THE FY2012 MOVING
TO WORK ANNUAL PLAN**

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TDD (302) 739-4264
Equal Opportunity
Employer

Equal Housing Opportunity
3/26,27,30/4/2,3,6,9,10,13,17,
20-NJ

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P.O. Box 7001 • Dover, Delaware • 19903 • 1-800-282-8586

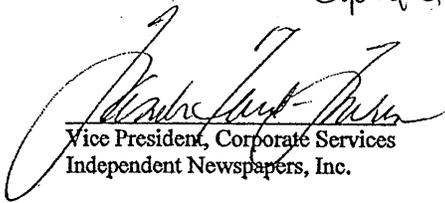
State of Delaware:

ss.

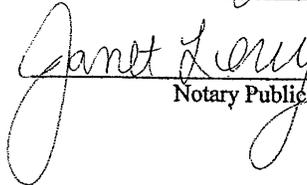
Counties of Kent:

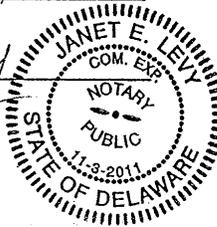
Before me, a Notary Public, for the County and State aforesaid, Wanda Ford-Waring, known to me to be such, who being sworn according to law deposes and says that she is an officer of Independent Newspaper Inc, the Publisher of the **The Delaware State News**, a daily newspaper published at Dover, County of Kent, and State of Delaware, and that the notice, a copy of which is hereto attached, as published in the **The Delaware State News** in its issue of March 26, 27, 30, 2011,

April 2, 3, 6, 9, 10, 13, 17, 20, 2011


Vice President, Corporate Services
Independent Newspapers, Inc.

Sworn to and subscribed before me this 20th
Day of April A.D. 2011


Notary Public





**PUBLIC HEARING NOTICE
ON THE FY2012 MOVING TO WORK ANNUAL PLAN**

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Equal Opportunity Employer
Equal Housing Opportunity



381665 DSN 3/26,27,30;4/2,3,6,9,10,13,17,20/2011

Attachment A

Budget Submissions

To HUD

NOTE

Budget submissions utilizing the Operating Fund Calculation of Subsidy (form HUD-52723) and Application for Federal Assistance (SF-424) have not been submitted to HUD as of May 12, 2011. The delay in submitting this information electronically is due to the fact that HUD is no longer utilizing the SAGIS system (which was used in prior years), and the new HUD Excel program is not ready to accept budget submissions as of this date.

When the HUD system is ready to process and approve the budget information, the related forms will be forward to the HUD-MTW office.

Attachment B

Annual Statement/Performance

And

Evaluation Report

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 3/31/2014

Part I: Summary		Grant Type and Number		FFY of Grant: 2009	
PHA Name: Delaware State housing Authority		Capital Fund Program Grant No: DE26-P004-50109		FFY of Grant Approval: 2009	
		Replacement Housing Factor Grant No: N/A			
		Date of CFFP: N/A			
Type of Grant	<input type="checkbox"/> Original Annual Statement	<input type="checkbox"/> Reserve for Disasters/Emergencies	<input type="checkbox"/> Revised Annual Statement (revision no:)		
	<input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 6/20/11		<input type="checkbox"/> Final Performance and Evaluation Report		
Line	Summary by Development Account	Original	Revised ²	Obligated	Total Actual Cost ¹
			Total Estimated Cost		Expended
1	Total non-CFFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	812,031.00	808,437.00	651,054.95	384,814.39
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFFP Grants for operations.
⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		FFY of Grant: 2009	
PHA Name: Delaware State Housing Authority		FFY of Grant Approval: 2009	
Grant Type and Number Capital Fund Program Grant No: DE26-P004-50109 Replacement Housing Factor Grant No: N/A Date of CFPP: N/A			
Type of Grant <input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 6/20/11		<input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report	
Summary by Development Account		Total Actual Cost ¹	
Line		Original	Revised ²
18a	1501 Collateralization or Debt Service paid by the PHA		Obligated
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		Expended
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)	812,031.00	808,437.00
21	Amount of line 20 Related to LBP Activities		651,054.95
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		
Signature of Executive Director : Anas Ben Addi		Signature of Public Housing Director	
		Date 6/21/11	
		Date	

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Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 3/31/2014

Part I: Summary		FFY of Grant: 2010	FFY of Grant Approval: 2010
PHA Name: Delaware State housing Authority		Grant Type and Number Capital Fund Program Grant No: DE26-P004-50110 Replacement Housing Factor Grant No: N/A Date of CFFP: N/A	
Type of Grant <input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 6/20/11		<input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Original	Total Estimated Cost Revised ²
1	Total non-CFP Funds		Total Actual Cost ¹ Expended
2	1406 Operations (may not exceed 20% of line 21) ³		Obligated
3	1408 Management Improvements		
4	1410 Administration (may not exceed 10% of line 21)		
5	1411 Audit		
6	1415 Liquidated Damages		
7	1430 Fees and Costs		
8	1440 Site Acquisition		
9	1450 Site Improvement		
10	1460 Dwelling Structures		
11	1465.1 Dwelling Equipment—Nonexpendable		
12	1470 Non-dwelling Structures		
13	1475 Non-dwelling Equipment		
14	1485 Demolition		
15	1492 Moving to Work Demonstration	814,204.00	81,420.00
16	1495.1 Relocation Costs		
17	1499 Development Activities ⁴		

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 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		FFY of Grant: 2010	
PHA Name: Delaware State Housing Authority		FFY of Grant Approval: 2010	
Grant Type and Number Capital Fund Program Grant No: DE26-P004-50110 Replacement Housing Factor Grant No: N/A Date of CFFP: N/A			
Type of Grant <input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 6/20/11		<input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report	
Summary by Development Account		Total Actual Cost ¹	
Line		Original	Revised ²
18a	1501 Collateralization or Debt Service paid by the PHA		Obligated
18ha	9000 Collateralization or Debt Service paid Via System of Direct Payment		Expended
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21	Amount of line 20 Related to LBP Activities		
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25	Amount of line 20 Related to Energy Conservation Measures		
Signature of Executive Director : Anas Ben Addi		Signature of Public Housing Director	
Date: 6/21/11		Date	

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Attachment C

General Order

And

Certification Statement

GENERAL ORDER NO. 575

**GENERAL ORDER ADOPTING
THE MOVING TO WORK
ANNUAL PLAN FOR FY 2012**

WHEREAS, The Delaware State Housing Authority (DSHA) entered into a Moving to Work Restated and Amended Agreement with HUD; and

WHEREAS, The Moving to Work Restated and Amended Agreement requires that the Delaware State Housing Authority submit an Annual Plan; and

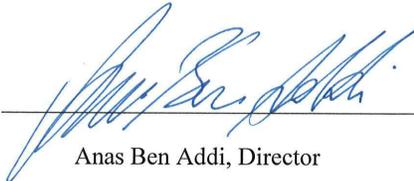
WHEREAS, The Moving to Work Restated and Amended Agreement requires certification that a public hearing was held regarding the Moving to Work Plan; and

WHEREAS, The Annual Plan shall describe the activities and sources and uses of funding that Delaware State Housing Authority is undertaking through the Moving to Work Program.

NOW THEREFORE BE IT ORDERED AS FOLLOWS:

1. The Director has reviewed and approved the Moving To Work Annual Plan for FY2012.
2. The Delaware State Housing Authority Certifies that it held public hearings, on April 27, 2011 and April 28, 2011, in accordance with the requirements of the Moving to Work Restated and Amended Agreement regarding the Moving to Work Annual Plan for FY2012.

DELAWARE STATE HOUSING AUTHORITY



Anas Ben Addi, Director



Date

**Annual Moving to Work Plan
Certifications of Compliance**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

**Certifications of Compliance with Regulations:
Board Resolution to Accompany the Annual Moving to Work Plan**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning 7/1/11, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA and conducted a public hearing to discuss the Plan and invited public comment.
2. The Agency took into consideration public and resident comment before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan;
3. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
4. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
5. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
6. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
7. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 8.
8. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
9. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

Attachment B

10. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

11. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

12. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.

13. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

14. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

15. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

16. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments.).

17. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

18. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Delaware State Housing Authority DE004/DE901

PHA Name

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)

Anas Ben Addi

Director

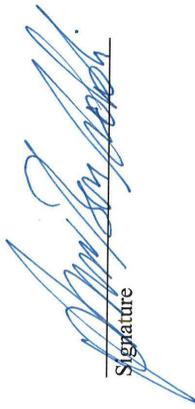
Name of Authorized Official

Title

Attachment B

9

OMB Control Number: 2577-0216
Expiration Date: 12/31/2011


Signature

05/12/2011
Date

Attachment B
10