

Mobile Housing Board

Bed Bug Policy

Background and General Information

What are bed bugs?

Bed bugs are small nocturnal insects that live by feeding on the blood of humans and other warm-blooded hosts. Bedbugs are generally active only at dawn, with a peak feeding period about an hour before sunrise. After feeding for about five minutes, the bug returns to its hiding place.

Bites consist of a raised red bump or flat welt, and are often accompanied by intense itching. The red bump or welts are the result of an allergic reaction to the anesthetic contained in the bed bug's saliva, which is inserted into the blood of the host. Bed bug bites may appear indistinguishable from mosquito bites, though they tend to last for longer periods. Bites may not become immediately visible, and can take up to 9 days to appear. Bed bug bites tend not to have a red dot in the center which is a characteristic of flea bites. A trait shared with flea bites, however, is the tendency towards arrangements of sequential bites. Bites are often aligned three in a row, giving rise to the colloquialism "breakfast, lunch and dinner."

There have been no known cases of bed bugs passing disease from host to host. Extensive testing has been done in laboratory settings that also conclude that bed bugs are unlikely to pass disease from one person to another. Therefore bedbugs are less dangerous than some more common insects such as the flea.

How did I get bed bugs

- Bedbugs were originally brought to the United States by early colonists from Europe. Bedbugs thrive in places with high occupancy, such as hotels. Bedbugs were believed to be altogether eradicated 50 years ago in the United States and elsewhere with the widespread use of DDT.
- One recent theory about bedbug reappearance involves potential geographic epicenters in some states. It was determined that workers in these facilities were the main spreaders of these bedbugs, unknowingly carrying them to their places of unit and elsewhere after leaving work.
- Many years ago, bed bugs were eradicated by the use of a pesticide, DDT. This is no longer used and may account for the resurgence of these bugs in the US as might the increase in international travel.
- Anyone can pick bed bugs up from a location where they presently exist – someone's apartment, hotels, motels, movie theatres, etc. Bed bugs are equal opportunity pests – they will infest anyone, anywhere.

What SHOULD I do if I believe I have bed bugs?

- Notify the Property Manager as soon as possible.

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- Be prepared to follow the written instructions **to the letter** and in a timely manner (within 24 hours).

What SHOULDN'T I do if I have bed bugs?

- Don't panic! Although bed bugs can be annoying, they can be battled safely and successfully if you follow all guidelines given to you by the Mobile Housing Board and/or a qualified third-party pest control company (or exterminator).
- If you believe you have bed bugs, do NOT wait until after 5pm on Friday to notify someone. It is not possible to get service from a qualified exterminator after hours.
- Do not apply pesticides on your own. The Mobile Housing Board will hire a licensed pest control operator to confirm the infestation and to develop an integrated pest management plan.
- Do not place your mattress or any furniture on the street or in common areas. Infested furniture can be cleaned and treated. Placing infested furniture (particularly mattresses) on the street or in common areas may simply help spread bed bugs to other units.
- Do not allow others to come to your unit and do not visit others before the bed bugs are eradicated. Doing so could result in further spreading.

Bed Bug Policy

The staff of the Mobile Housing Board is committed to an effective and efficient response to residents who suspect they may have bed bugs. For the safety and comfort of all residents living in Mobile Housing Board units, our staff will adhere to the following guidelines:

1. As soon as a resident suspects that he/she may have bed bugs, they should immediately contact the property manager at the property in which they live. If another Mobile Housing Board staff member learns of a potential bed bug problem, their first call should be to the relevant property manager. Mobile Housing Board staff should make contact with the resident within twenty-four (24) hours of the resident's report, and should at that time provide the resident with information about the control and prevention of bed bugs and discuss with them the measures that the resident may be able to take in the unit before the inspection is performed. Mobile Housing Board staff should advise the resident that a bed bug inspection and, if necessary, treatment, may take time to schedule. But, that staff will be taking appropriate action within a reasonable time period to address the resident's concerns.
2. The property manager will notify a qualified third-party pest control company trained in bed bug detection as soon as possible, so the exterminator can be dispatched to the location to perform a thorough inspection of the unit in question. The inspection should occur within three (3) calendar days of the resident's report, when possible. The inspections should cover the unit reporting the infestation and no less than the surrounding units consisting of the units above, below, left and right, and should be completed within three (3) business days of the resident complaint, if possible. If a reputable, licensed pest control company is unattainable within three (3) calendar days, the Mobile Housing Board shall retain documentation of the efforts to obtain qualified services. Please note that should a resident notify the property

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manager on a weekend or holiday, the qualified third-party pest control company will be contacted as soon as possible but no later than the next business day. It is recommended that resident contact the property manager as early on a regular business day as possible. Mobile Housing Board staff should also advise the resident that the exterminator may not be able to be dispatched on weekends or holidays. Once notice is received or a report is made to the property manager regarding a bed bug issue, residents may not, at any time, deny the exterminator or Mobile Housing Board staff access to the unit. Mobile Housing Board staff accompanied by a qualified third-party pest control company (or exterminator) may enter the unit to perform the inspection, in accordance with the terms of the resident's lease agreement. If an infestation is suspected but cannot be verified using the described method, the Mobile Housing Board should re-inspect the unit(s) periodically over the next several months.

3. Exterminator Findings

- If the exterminator finds that there are no bedbugs present in the unit, then no further action will be taken. The resident will be asked to continue monitoring the unit, and to notify the Mobile Housing Board immediately if there are further problems.
- If the exterminator concludes that bed bugs are present in the unit, the Mobile Housing Board will provide the affected resident(s) with a detailed list of instructions for the removal and laundering of their personal items and shall attempt to schedule treatment within five (5) days of the inspection, when possible. Residents should be advised that treatment may take several weeks and may require multiple treatments and inspections. The length, method, and extent of treatment will depend on the severity and complexity of the infestation, and the level of cooperation of the resident(s). The Mobile Housing Board will not charge the resident for the cost of bed bug treatments; however, the Mobile Housing Board shall not be responsible for washing, drying, or dry cleaning of other household items such as clothes, bedding or other related items. The resident will not be reimbursed by the Mobile Housing Board for the cost of any additional expense to the unit, such as the purchase of new furniture, clothing, or cleaning services.
- Only a qualified third-party pest control company trained in bed bug detection can confirm or deny the presence of bed bugs – NOT any outside person.

4. Preventative Measures

- The Mobile Housing Board may take the following preventative steps to support and facilitate ongoing efforts to prevent and respond to bed bugs.
 - Provide training for Mobile Housing Board staff to identify bed bugs and perform ongoing prevention actions, including but not limited to, looking for bed bugs or signs of infestation on secondhand items, including furniture before bringing the items into the unit on a voluntary basis.
 - Perform periodic building inspections when a building is at a high risk for bed bugs (i.e. if the building has experienced prior infestations).
 - Actively engage residents in efforts to prevent bed bugs, including but not limited to, holding voluntary workshops or informational meetings for

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- residents to learn how to identify bed bugs, to create unfriendly environments for the pests, and to report suspicions of bed bugs as soon as possible.
- Provide orientation for new tenants on a voluntary basis and Mobile Housing Board staff, and post signs and handouts regarding bed bug prevention.
 - At the Mobile Housing Board's expense, offer protective tools to residents to help safeguard units and property from infestation and recurrences, including but not limited to, bed and/or mattress covers, climb-up interceptors, or other detection or protection devices that are or may become available.
 - At the Mobile Housing Board's expense, voluntarily offer residents a service of non-chemical treatment of household items upon resident moving in, non-chemical treatment or inspection of used furniture and/or chemical treatment of luggage before it is unpacked when a resident returns from a trip.
5. The Mobile Housing Board shall not deny tenancy to a potential resident on the basis of the resident having experienced a prior bed bug infestation, nor shall the Mobile Housing Board give residential preference to any resident based on a response to a question regarding prior exposure of bed bugs.
6. Bed bugs are a serious community issue, and ALL residents are expected to comply with all instructions given to them within 24 hours once bed bugs have been confirmed within their living space.
7. **Insecticides alone won't control bedbug infestations. Your cooperation and following the directions on the "Bedbug Preparation Checklist" is required for the treatment to work. Please remember, you MUST NOT hinder the treatment of the unit. Your cooperation is essential. If you do not cooperate and/or do not complete the checklist, we will be forced to issue a Demand for Possession and your lease may be terminated.**

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Bed Bug Extermination Checklist

The Mobile Housing Board has contacted a certified pest control company to exterminate the bed bugs from your unit. However, the success of this process depends on you and your family's complete cooperation. Below is a list of your responsibilities that **MUST** be completed before the pest control company can begin the extermination process. Failure to cooperate and/or complete ALL of the items below may result in the termination of your lease.

Your unit is scheduled to be treated on the date below. The checklist must be completed by that date! If there is some reason that you can't have the check list complete by the below date please let us know immediately.

Date	Time
Your Unit will be Treated By:	

Completed ✓	Items to be complete by the resident
	Strip the bed(s) and launder all sheets, pillowcases, mattress pads, and blankets.
	Remove everything from bedroom closet(s) and place in plastic bags.
	Remove everything from dresser drawers, nightstands, and dressing tables and place in plastic bags.
	Have all clothing and fabrics laundered or dry-cleaned.
	Remove drapes and have them, laundered, dry-cleaned, or replaced.
	Discard cardboard boxes, shoeboxes, paper and plastic bags, old newspapers, stacks of magazines, and similar items in the infested rooms.
	Vacuum all infested rooms. Also vacuum mattresses, bedsprings, couches, chairs, closets and closet shelves, shoes, inside dresser drawers, and bedside table drawers. Vacuum bags are to be placed in a plastic bag and discarded.

Important Notes

❖ Discarding of any compromised (ripped/torn) materials or heavily infested item may be required.
❖ Dismantling of bed frames and other items will be performed as part of the service program.
❖ Should the box spring remain, removal of the cheesecloth underside is required for proper inspection and/or application.
❖ Zippered mattress bags will be used. Mattresses can be used (back on the bed frame) but must remain in these bags for at least thirty (3) days. Linens are to go over the bags.
❖ If laundering, a hot water & detergent cycle + dryer must be used.
❖ A clutter free environment must be provided in order to allow access for the service technician to treat all of the needed areas.
❖ Before removing all bagged items the resident should inspect for pest activity.
❖ The resident should not touch or move any monitoring device.
❖ Insecticide treatments MUST NOT be performed by the resident.

By my signature below I certify that I have read, understand, and have fully completed the above checklist. **Failure to fully cooperate may result in the termination of my lease.**

Resident Signature	Date
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MOBILE HOUSING BOARD

BED BUG CONTROL & INFORMATION BROCHURE

Address

City, State, Zip

Phone

Mobile Housing Board

QUESTIONS AS AN [MHB PROPERTY] Mobile Housing Board Resident

What are bedbugs?

Bedbugs are small, brownish, flattened insects that feed solely on blood. Adult bedbugs are about 3/16-inch long and reddish-brown, with oval, flattened bodies. They are sometimes mistaken for ticks or cockroaches. They cannot jump or fly. However, bedbugs are skilled climbers. Some studies show that they climb great heights in order to drop themselves down to lower surfaces that were otherwise inaccessible to them.

What are the habits of bedbugs?

Bedbugs are active mainly at night and prefer to hide close to where they feed. They can crawl several feet to obtain a blood meal. Bedbugs hide during the day in dark, protected sites. They prefer fabric, wood, and paper surfaces. Bedbugs often crawl upward to hide in pictures, wall hangings, drapery pleats, loosened wallpaper, cracks in plaster, and ceiling moldings during the day. Bedbugs initially can be found about tufts, seams, and folds of mattresses, later spreading to crevices in the bedstead or throughout the bedroom. In heavier infestations, they also may occupy hiding places farther from the bed.

How do I know if I have bedbugs?

A bedbug infestation can be recognized by blood stains from crushed bugs or by rusty (sometimes dark) spots of excrement on sheets and mattresses, bed clothes, and walls. Fecal spots, eggshells, and shed skins may be found in the surrounding area of their hiding places. An offensive, sweet, musty odor from their scent glands may be detected when bedbug infestations are severe. You may or may not have signs of bites on your body.

Can bedbugs carry diseases?

The Center for Disease Control and Prevention reports that bedbugs can NOT give humans a disease. People may have an allergic reaction to the bite.

What do I need to do if I think I have bedbugs in the unit?

Contact the Property Management Office at [PHONE NUMBER] to set up an inspection. **DO NOT** try to eliminate the problem alone or without our assistance. It is a very serious matter and a certified pest control provider needs to conduct extermination.

Has the pest control person been trained to treat for bedbugs?

Yes, the pest control person is trained and will work with the Mobile Housing Board Property Management Office and you to make certain that all pests are removed from the unit.

What can I do to make sure I do not get bedbugs in the unit?

1. **Do Not** pick up mattress or other furniture from the side of the road, other apartments or from dump sites.
2. If you purchase or rent used furniture or mattresses, inspect them carefully for signs of bedbugs.
3. Inspect and wash in hot soapy water clothing purchased from consignment stores or second hand stores.
4. Because we know that bedbugs are an increasing problem, it is important and necessary to inspect any location away from home where you are planning to sleep.
5. Take steps to try to avoid picking up bedbugs from hotels, motels or any other sources when you or your family members travel, even to local destinations.

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6. Consider purchasing a special mattress cover (encasement) for your beds. Rather than purchasing a cover to place on top of the mattress, purchase one that actually zips around it entirely and seals up the inside - meaning no bugs are getting in or out.
7. If you believe your mattress is infested you may want to consider throwing it away. **Do Not** leave it on the porch, in the yard, or at the curb as it could create infestation with your neighbors. Take it to the city dumpster or call the Property Management Office to have it removed.
8. It is much easier to control the problem when the infestation is small. Keep clutter down, so it is easier to inspect and bed bugs have fewer hiding places.
9. Wash your bedding, including pillows and comforters weekly and dry them on high for at least 20 minutes.
10. Bedbugs can come in with a guest, latching on to luggage and clothes. Take extra caution when you have guest spend the night at the unit.
11. Remove old furniture that is not used.
12. Vacuum the floors weekly and use a vacuum tool to clean the baseboards in the unit.
13. Wash and inspect your children's book bags and jackets weekly.

Note: If you have a problem with pest in your unit, contact the Property Management Office and notify your property manager at [MHB Property].

What do I need to do if I believe I have bedbugs in the unit?

1. Don't panic. It is not life threatening and bedbugs do not carry diseases.
2. Contact the Property Management Office as soon as possible and we will schedule an inspection with a qualified pest control provider.
3. Do not have guest come spend the night. Once the guest returns home, they could unknowingly carry bedbugs from your apartment and infest their homes.
4. Once the inspection is completed, the Property Management Office will notify you of the results.

If it is determine that I have bedbugs in the unit, what will I have to do?

1. The Property Management Office will schedule an appointment for treatment as soon as possible. Generally within 3 to 5 business days.
2. You will be given a "Bedbug Preparation Checklist" which will instruct you on how to prepare for the treatment. You will be asked to certify that you have completed the tenant responsibilities on the checklist.
3. On the day of the treatment, you need to make sure that all bedding is removed from the bed, all the curtains removed from the windows and washed/dried the day of the treatment. If this is not done, you could very well infest the unit again.
4. If you do not have a washer and dryer in the unit take your belongings to a laundromat. Place them in a sealed plastic bag as you travel to the laundromat. If you fail to place them in a plastic bag, you could infest your automobile.
5. You will need to be present when the pest control provider arrives at the unit. However, after he/she gives you additional instructions, you and your family members will need to leave the apartment during the treatment process. Generally, you will be able return home within 4 hours.
6. Once the treatment is completed, continue to monitor the bed and apartment for signs that bedbugs are still present.

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7. **Do not** use any other types of insecticides (Raid or Powder) after the treatment has been completed.
8. We will do a follow up inspection and a counseling session within 30 days after the initial treatment.

Remember! Getting rid of bed bugs is a team effort! It will require your cooperation and you will be required to assist us and the pest control provider eliminating them from your unit.

What type of insecticide will be used during treatment?

The treatment **MUST** be very aggressive to eliminate bedbugs. Every precaution for your safety will be taken. Only a certified pest control provider will treat your unit.

The pest control provider will use ***bed bug labeled insecticide***. It is an aerosol and will be used throughout the unit. Insecticides may be applied as liquids directly to cracks, crevices, bed frames, baseboards, or similar sites or they may be applied as dusts in cracks and crevices. The most effective bed bug pesticides are available to commercial pesticide applicators only. Professionals also have the equipment and expertise that allow a more effective application of insecticides than residents could do themselves.

The pest control provider may also place “monitors” around the furniture depending on the infestation and/or the condition of the unit. The “monitors” do not have an active ingredient considered to be a pesticide or insecticide and are not harmful. They will be placed throughout the unit to assist us in determining if you have any bedbug activity (movement/traveling) after the treatment. Do not move or remove the “monitors” while they are present in your unit. They will be placed in areas that we suspect may have been traveling paths for bed bugs.

Insecticides alone won't control bed bug infestations. Your cooperation and following the directions on the “Bed bug Preparation Checklist” is required for the treatment to work. Please remember, you MUST NOT hinder the treatment of the unit. Your cooperation is essential. If you do not cooperate and/or do not complete the checklist we will be forced to issue a Demand for Possession and your lease may be terminated.

Bed bugs are a serious issue and can very easily infest the development.

Please do your part!

**MOBILE HOUSING BOARD
COMMUNITY SERVICE AND SELF-SUFFICIENCY POLICY**

A. Background

The Quality Housing and Work Responsibility Act of 1998 requires that all non-exempt (see definitions) public housing adult residents (18 or older) contribute eight (8) hours per month of community service (volunteer work) or participate in eight (8) hours of training, counseling, classes or other activities that help an individual toward self-sufficiency and economic independence. This is a requirement of the Public Housing Lease.

B. Definitions

Community Service – volunteer work that includes, but is not limited to:

- Work at a local institution including, but not limited to: school, child care center, hospital, hospice, recreation center, senior center, adult day care center, homeless shelter, indigent feeding program, cooperative food bank, etc.;
- Work with a non-profit organization that serves Mobile Housing Board (MHB) residents or their children such as: Boy Scouts, Girl Scouts, Boys or Girls Clubs, 4-H Program, PAL, Garden Center, community clean-up programs, beautification programs, other youth or senior organizations;
- Work at the MHB to help improve physical conditions;
- Work at the MHB to help with children’s programs;
- Helping neighborhood groups with special projects;
- Working through resident organization to help other residents with problems, serving as an officer in a resident organization, serving on the Resident Advisory Board; and
- Caring for children of other residents so they may volunteer.

NOTE: Political activity is excluded.

Self-Sufficiency Activities – activities that include, but are not limited to:

- Job readiness programs;
- Job training programs;
- GED classes;
- Substance abuse or mental health counseling;
- English proficiency or literacy (reading) classes;
- Apprenticeships;
- Budgeting and credit counseling;

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COMMUNITY SERVICE AND SELF-SUFFICIENCY POLICY**

- Any kind of class that helps a person toward economic independence; and
- Full time student status at any school, college or vocational school.

Exempt Adult – an adult member of the family who:

- Is 62 years of age or older;
- Has a disability that prevents him/her from being gainfully employed;
- Is the caretaker of a disabled person;
- Is working at least 20 hours per week or has wages of at least \$6, 084 annually; or
- Is participating in a welfare-to-work program.

C. Requirements of the Program

1. The eight (8) hours per month may be either volunteer work or self-sufficiency program activity, or a combination of the two.
2. At least eight (8) hours of activity must be performed each month. An individual may not skip a month and then double up the following month, unless special circumstances warrant special consideration. The MHB will make the determination of whether to allow or disallow a deviation from the schedule.
3. Activities must be performed within the community and not outside the jurisdictional area of the MHB.
4. Family obligations
 - At lease execution or re-examination after February 1, 2000, all adult members (18 or older) of a public housing resident family must
 1. provide documentation that they are exempt from Community Service requirement if they qualify for an exemption, and
 2. sign a certification that they received and read this policy and understand that if they are not exempt, failure to comply with the Community Service requirement will result in non-renewal of their lease.
 - At each annual re-examination, non-exempt family members must present a completed documentation form (to be provided by MHB) of activities performed over the previous twelve (12) months. This form will include places for signatures of supervisors, instructors, or counselors certifying to the number of hours contributed.
 - If a family member is found to be noncompliant at re-examination, he/she and the Head of Household will sign an agreement with the MHB to make up the deficient hours over the next twelve (12) month period.

**MOBILE HOUSING BOARD
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5. Change in exempt status:

- If, during the twelve (12) month period, a non-exempt person becomes exempt, it is his/her responsibility to report this to the MHB and provide documentation of such.
- If, during the twelve (12) month period, an exempt person becomes non-exempt, it is his/her responsibility to report this to the MHB. The MHB will provide the person with the Recording/Certification documentation form and a list of agencies in the community that provide volunteer and/or training opportunities.

D. Authority obligations

1. To the greatest extent possible and practicable, the MHB will:

- Provide names and contacts at agencies that can provide opportunities for residents, including disabled, to fulfill their Community Service obligations. (According to the Quality Housing and Work Responsibility Act, a disabled person who is otherwise able to be gainfully employed is not necessarily exempt from the Community Service requirement); and
- Provide in-house opportunities for volunteer work or self-sufficiency programs.

2. The MHB will provide the family with exemption verification forms and Recording/Certification documentation forms and a copy of this policy at initial application and at lease execution.

3. The MHB will make the final determination as to whether or not a family member is exempt from the Community Service requirement. Residents may use the MHB's Grievance Procedure if they disagree with the MHB's determination.

4. Noncompliance of family member:

- At least thirty (30) days prior to annual re-examination and/or lease expiration, the MHB will begin reviewing the exempt or non-exempt status and compliance of family members;
- If the MHB finds a family member to be noncompliant, the MHB will enter into an agreement with the noncompliant member and the Head of Household to make up the deficient hours over the next twelve (12) month period;
- If, at the next annual re-examination, the family member still is not compliant, the lease will not be renewed and the entire family will have to vacate, unless the noncompliant member agrees to move out of the unit;

Mobile Housing Board Schedule of Flat and Minimum Rents

Minimum Rent = \$50.00

Development	0BR	1BR	2BR	3BR	4BR	5BR
Oaklawn		\$525	\$630	\$827		
Orange Grove		\$525	\$630	\$827		
Thomas James		\$525	\$630	\$827		\$1071
Gulf Village		\$525	\$630	\$827		
RV Taylor		\$525	\$630	\$827	\$931	\$1071
Central Plaza Towers	\$519	\$525	\$630			
Emerson Gardens		\$519	\$616			
Boykin Tower		\$525	\$630			
Downtown Renaissance		\$561	\$673			
Max Rent – 60%		\$682	\$826			
Renaissance Gardens			\$630	\$827		
The Renaissance Max Rent		\$682	\$819	\$945		

Mobile Housing Board

Reasonable Accommodation Policy and Procedures

INTRODUCTION

The Mobile Housing Board (“MHB”) is committed to ensuring that its policies and procedures do not deny individuals with disabilities the opportunity to participate in, or benefit from, nor otherwise discriminate against individuals with disabilities, on the basis of disability, in connection with the operations of Mobile Housing Board’s programs, services and activities.

Therefore, if an individual with a disability requires an accommodation such as an accessible feature or modification to a MHB policy, MHB will provide such accommodation unless doing so would result in a fundamental alteration in the nature of the program; or an undue financial and administrative burden. In such a case, MHB may make another accommodation that would not result in a financial or administrative burden.

A copy of MHB’s Reasonable Accommodation Policy (“Policy”) shall be available at MHB’s central office, in the management office of each public housing development, the Housing Choice Voucher Program office, and on its website at www.mobilehousing.org.

LEGAL AUTHORITY

Mobile Housing Board is subject to Federal civil rights laws and regulations. This Reasonable Accommodation Policy is based on the following statutes or regulations:

1. Section 504 of the Rehabilitation Act of 1973 (Section 504);
2. Titles II and III of the Americans with Disabilities Act of 1990 (ADA);
3. The Fair Housing Act of 1968, as amended (Fair Housing Act);
4. The Architectural Barriers Act of 1968; and
5. The respective implementing regulations for each Act.

MONITORING

The 504 Coordinator is responsible for monitoring compliance with this Policy and shall be available to applicants, residents, participants, and staff for discussing issues and questions regarding the interpretation or implementation of this Policy. The contact information for the 504 Coordinator is as follows:

Casey Dickinson
151 S. Claiborne Street
Mobile, AL 36602
Telephone (251) 434-2200
Fax (251) 287-8243
cdickinson@mobilehousing.org

TDD/TTY 1-800-545-1833, EXTENSION 824

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Reasonable Accommodation Policy and Procedures

STAFF TRAINING

The Executive Director or his/her designee will ensure that all appropriate HA staff receive adequate training (ideally at least annually) on the Reasonable Accommodation Policy and Procedures, including all applicable Federal, state and local requirements regarding reasonable accommodation.

REASONABLE ACCOMMODATION

A person with a disability may request a reasonable accommodation at any time during the application process, residency in public housing, or participation in the Housing Choice Voucher and Moderate Rehabilitation Programs of HA. The individual, HA staff or any person identified by the individual can submit such requests in writing, orally, or by any other equally effective means of communication. Verbal requests will be followed up with a written request.

Reasonable accommodation methods or actions that may be appropriate for a particular program and individual may be found to be inappropriate for another program or individual. The decision to approve or deny a request for a reasonable accommodation is made on a case-by-case basis and takes into consideration the disability and the needs of the individual as well as the nature of the program or activity in which the individual seeks to participate.

APPLICATION OF REASONABLE ACCOMMODATION POLICY

The Reasonable Accommodation Policy applies to individuals with disabilities in the following programs provided by the MHB:

- A. Applicants of public housing;
- B. Applicants of all Housing Choice Voucher and Moderate Rehabilitation Programs;
- C. Residents of public housing developments;
- D. Participants of the Housing Choice Voucher and Moderate Rehabilitation Programs; and
- E. Participants in all other programs or activities receiving Federal financial assistance that are conducted or sponsored by the MHB, its agents or contractors including all non-housing facilities and common areas owned or operated by the MHB.

PERSON WITH A DISABILITY

A person with a disability means an individual who has a physical or mental impairment that substantially limits one or more major life activities. As used in this definition, the phrase “physical or mental impairment” includes:

- A. Any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: Neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; or
- B. Any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term “physical or mental impairment” includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech, and hearing impairments, cerebral palsy, autism,

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Reasonable Accommodation Policy and Procedures

epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, drug addiction and alcoholism. “Major life activities” means functions such as caring for one’s self, performing manual tasks, walking, seeing, hearing, speaking, breathing and learning.

The definition of disability does not include any individual who is an alcoholic whose current use of alcohol prevents the individual from participating in the public housing program, Housing Choice Voucher Program, Moderate Rehabilitation Program or activities; or whose participation, by reason of such current alcohol abuse, would constitute a direct threat to property or the safety of others.

EXAMPLES OF REASONABLE ACCOMMODATIONS

Examples of reasonable accommodations may include, but are not limited to:

- A. Making a unit, part of a unit or public and common use element accessible for the head of household or a household member with a disability who is on the lease;
- B. Permitting a family to have a service or assistance animal necessary to assist a family member with a disability;
- C. Allowing a live-in aide to reside in an appropriately sized MHB unit;
- D. Transferring a resident to a larger size unit to provide a separate bedroom for a person with a disability;
- E. Transferring a resident to a unit on a lower level or a unit that is completely on one level;
- F. Making documents available in large type, computer disc or Braille;
- G. Providing qualified sign language interpreters for applicant or resident meetings with MHB staff; or at resident meetings;
- H. Installing strobe type flashing lights and other such equipment for a family member with a hearing impairment;
- I. Permitting an outside agency or family member to assist a resident or an applicant in meeting screening criteria or meeting essential lease obligations;
- J. Permitting requests for extensions of Housing Choice Vouchers if there is a difficulty in locating a unit with suitable accessible features or otherwise appropriate for the family; and
- K. As a reasonable accommodation for a family member with a disability, approving a request for exception payment standard amounts under the Housing Choice Voucher Program in accordance with 24 C.F.R. §§ 8.28 and 982.504 (b)(2).

PROCESSING OF REASONABLE ACCOMMODATION REQUESTS

MHB will provide the “Request for Reasonable Accommodation”, (“Request Form”), attached hereto, to all applicants, residents or individuals with disabilities who request a reasonable

Mobile Housing Board

Reasonable Accommodation Policy and Procedures

accommodation. The Reasonable Accommodation Request Form includes various forms of reasonable accommodations as well as the general principles of reasonable accommodation.

Individuals may submit their reasonable accommodation request(s) in writing, orally, or by any other equally effective means of communication. However, the MHB will ensure that all reasonable accommodation requests will be reduced to writing. If needed as a reasonable accommodation, the MHB will assist the individual in completing the Request Form.

- A. The MHB will provide all applicants with the Request Form as an attachment to the MHB application. The Request for Reasonable Accommodation Form must be provided in an alternative format, upon request.
- B. Reasonable Accommodations will be made for applicants during the application process. All applications must be taken in an accessible location. Applications will be made available in accessible formats. MHB will provide applicants with appropriate auxiliary aids and services, including qualified sign language interpreters and readers, upon request.
- C. MHB will provide all residents with the Request Form during the annual re-certification upon request. The MHB will provide the Request Form in an alternate form, upon request.
- D. Residents seeking accommodation(s) may contact the housing management office, including office of private management companies acting on behalf of MHB, within their housing development or the Central Administrative Office. In addition, residents may also contact the Compliance office directly to request the accommodation(s).
- E. Within seven (7) business days of receipt, the housing management office, private management company, or regional management office will forward the resident's reasonable accommodation request(s) to the 504 Coordinator.
- F. Within twenty (20) business days of receipt, the 504 Coordinator or the resident's regional or management office will respond to the Resident's Request.
- G. If additional information or documentation is required, the 504 Coordinator will notify the resident, in writing, of the need for the additional information or documentation. The 504 Coordinator will provide the resident with the "Request for Information or Verification Form", a copy of which is attached. The written notification should provide the resident with a reply date for submission of the outstanding information or documentation.
- H. Within thirty (30) business days of receipt of the request and, if necessary, all supporting documentation, MHB will provide written notification to the resident of its decision to approve or deny the resident's request(s). Upon request, the written notification will be provided in an alternate format. A copy of the "Letter Denying Request for Reasonable Accommodation(s)" and "Letter Approving Request for Reasonable Accommodation(s)" are attached.
- I. If MHB approves the accommodation request(s), the resident will be notified of the projected date for implementation.

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Reasonable Accommodation Policy and Procedures

- J. If the accommodation is denied, the resident will be notified of the reasons for denial. In addition, the notification of the denial will also provide the resident with information regarding MHB's HUD-approved Grievance Procedures.
- K. All recommendations that have been approved by the 504 Coordinator will be forwarded to the appropriate housing manager for implementation. All requests for reasonable accommodations that are approved will promptly be implemented or begin the process of implementation.

VERIFICATION OF REASONABLE ACCOMMODATION REQUEST

MHB may request documentation of the need for a Reasonable Accommodation as identified on the Request for Reasonable Accommodation Form. In addition, MHB may request that the individual provide suggested reasonable accommodations. The MHB may verify a person's disability only to the extent necessary to ensure that individuals who have requested a reasonable accommodation have a disability-based need for the requested accommodation.

However, the MHB may not require individuals to disclose confidential medical records in order to verify a disability. In addition, the MHB may not require specific details regarding the individual's disability. The MHB may only request documentation to confirm the disability-related need(s) for the requested reasonable accommodation(s). The MHB may not require the individual to disclose the specific disability(ies); or the nature or extent of the individual's disability(ies).

The following may provide verification of a resident's disability and the need for the requested accommodation(s):

- A. Physician;
- B. Licensed health professional;
- C. Professional representing a social service agency; or
- D. Disability agency or clinic.

Upon receipt, the resident's Property Manager, including private management companies operating on behalf of MHB, will forward the recommendation, including all supporting documentation, to the MHB's 504 Coordinator within seven (7) days of receipt.

DENIAL OF REASONABLE ACCOMMODATION REQUEST(S)

Requested accommodations will not be approved if one of the following would occur as a result:

- A. A violation of State and/or federal law;
- B. A fundamental alteration in the nature of the MHB public housing program;
- C. An undue financial and administrative burden on MHB;
- D. A structurally infeasible alteration; or
- E. An alteration requiring the removal or alteration of a load-bearing structural member.

TRANSFER AS REASONABLE ACCOMMODATION

Mobile Housing Board

Reasonable Accommodation Policy and Procedures

MHB shall not require a resident with a disability to accept a transfer in lieu of providing a reasonable accommodation. However, if a public housing resident with a disability requests dwelling unit modifications that involve structural changes, including, but not limited to widening entrances, rooms, or hallways, and there is a vacant, comparable, appropriately sized UFAS-compliant unit in that resident's project or another project, MHB may offer to transfer the resident to the vacant unit in his/her project or to another project in lieu of providing structural modifications.

However, if that resident rejects the proffered transfer or voucher, MHB shall make modifications to the resident's unit unless doing so would be structurally impracticable or would result in an undue financial and administrative burden. If the resident accepts the transfer, MHB will work with the resident to obtain moving expenses from social service agencies or other similar sources. If that effort to obtain moving expenses is unsuccessful within 30 days of the assignment of the dwelling unit, MHB shall pay the reasonable moving expenses, including utilities fees and deposits. Nothing contained in this paragraph is intended to modify the terms of MHB's Tenant and Assignment Plan and any resident's rights thereunder.

HOUSING CHOICE VOUCHER AS REASONABLE ACCOMMODATION

- A. When issuing a voucher as an accommodation, MHB must include a list of current available accessible units known to MHB, upon request. MHB will also provide search assistance. MHB may also partner with a qualified, local disability organization to assist the resident or applicant with the search for available, accessible housing. See 24 C.F.R. § 8.28.
- B. Extensions are available as a reasonable accommodation to eligible individuals with disabilities. These extensions are subject to documentation that a diligent effort to locate a unit has been conducted considering any impediments to searching because of a family member's disability.
- C. MHB may, if necessary as a reasonable accommodation for an individual with a disability, approve a family's request for an exception payment standard amount under the Housing Choice Voucher Program so that the program is readily accessible to and usable by individuals with disabilities. See 24 C.F.R. §§ 8.28 and 982.504(b) (2).
- D. Upon request by an applicant, participant, or their representative, MHB will ask the HUD Field Office for an exception payment standard up to 120% of the Fair Market Rent (FMR). However, the applicant, participant or the representative, must provide documentation of the need for the exception payment standard to MHB.
- E. In exceptional cases, MHB may ask the Assistant Secretary for Public and Indian Housing of HUD for an exception payment standard amount over 120% of the FMR, provided the applicant, participant or the representative provides the appropriate supporting documentation.

SERVICE OR ASSISTANCE ANIMALS

Mobile Housing Board Reasonable Accommodation Policy and Procedures

Residents of MHB with disabilities are permitted to have service and assistance animals, if such animals are necessary as a reasonable accommodation for their disabilities. MHB residents or potential residents who need an assistance animal as a reasonable accommodation must request the accommodation in accordance with the reasonable accommodation policy. Service and Assistance animals are not subject to the requirements of MHB's Pet Policy.

RIGHT TO APPEAL/GRIEVANCE PROCESS

- A. The public housing applicant or resident may file a complaint in accordance with MHB's HUD-approved Grievance Procedure following a formal determination by the MHB's ADA/504 Coordinator.
- B. The Housing Choice Voucher and Moderate Rehabilitation Program participant and applicant complainant may file a complaint in accordance with MHB's HUD Approved Grievance Procedure following a formal determination by the MHB's ADA/504 Coordinator.
- C. An applicant or resident may, at any time, exercise their right to appeal MHB's decision through the local HUD office or the U.S. Department of Justice. Individuals may contact the local HUD office at:

U.S. Department of Housing and Urban Development
950 22nd St. N, Suite 900
Birmingham, Alabama 35203
Telephone: 205-731-2630
Facsimile: 205-731-2502

Mobile Housing Board Reasonable Accommodation Policy and Procedures

CONFIDENTIAL MOBILE HOUSING BOARD

Address
City, State, Zip
Phone (xxx) xxx-xxxx – Fax (xxx) xxx-xxxx

Special Medical Accommodation Needs Verification

TO:	_____

Re: Patient Making Request:	DOB:	
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The individual named above has identified you as his/her medical provider and requested a special accommodation based on an alleged medical need. The Department of Housing and Urban Development has specific regulations related to the request for additional bedrooms for a special accommodation. *If this request is for a live-in aide, the live-in aide **MUST** be required (twenty-four hours a day) for the approval of the requester's special needs accommodation. If the request is for medical equipment, the equipment **MUST** be of the size and nature to require an additional bedroom.* These reasons must be 3rd party verified before we can process the request. This is a “time sensitive” request and we respectfully ask that you return the completed form directly to the Mobile Housing Board in the self-addressed stamped envelope (or fax) as soon as possible. The requested accommodation and authorization for release of information is below. As the medical provider named by the person requesting the accommodation you are asked to verify that the requested accommodation IS or IS NOT medically needed by the requestor. This is NOT a request for medical information. NO other medical information/history is being requested.

Requestor Statement and Authorization to Release Information

I	Name of Requestor (printed)	authorize	Medical Provider's Name
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Reason(s) for Special Request:	_____

My signature at the right serves as my authorization for the verification of my request and acknowledgement that I have read and understand this form and the penalty for any misrepresentation.	Signature (of Requestor)	Date
--	--------------------------	------

Medical Provider's Verification of Need Statement

In the space below please verify that you (**Do** or **Do Not**) medically support the need for an additional bedroom for the requestor and state your reason(s).

My signature at the right serves to acknowledgement that I have read and understand this form and the penalty for any misrepresentation.	Medical Provider's Signature	Date
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Mobile Housing Board Reasonable Accommodation Policy and Procedures

MOBILE HOUSING BOARD

Request for Reasonable Accommodation

You may utilize this form to request that the Mobile Housing Board provide a reasonable accommodation to you, or any member of your household who has a disability, so that you or a member of your household may utilize your residence, or any of the MHB's facilities, programs or services.

For purposes of this form, please refer to the attached "Reasonable Accommodation Policy" to determine whether you are a "qualified individual with a disability." If you would like to request a reasonable accommodation on behalf of yourself or a member of your household, please complete this form. You must date and sign your name at the bottom of this form and return the form to the property manager's office. If you need assistance in understanding whether you or a member of your household is a "qualified individual with a disability" or if you need assistance in completing this form, please contact your local property management office or the MHB's 504 Coordinator.

The 504 Coordinator for this agency is: Casey Dickinson

Date of Request:			
Applicant/Resident Name	SSN	Phone	Address
City		State	Zip
<input type="checkbox"/> I am requesting the following reasonable accommodation(s) for myself.			
<input type="checkbox"/> I am requesting the reasonable accommodation(s) on behalf of:		(Name):	
My reason(s) for requesting this reasonable accommodation:			
Please indicate which option you prefer:			
<input type="checkbox"/> I wish to have modifications made to my current unit only			
<input type="checkbox"/> I would consider moving to a unit that is currently modified, but only within my current development			
<input type="checkbox"/> I would consider moving to a unit that is currently modified, even in another Development			
<input type="checkbox"/> Other - Explain			

A physician, licensed health care professional, professional representing a social service agency, disability agency or clinic may provide verification of your disability.

You may request a physical modification to your current unit or a transfer to a unit that has been previously modified [in your development or another development]. The MHB will work with you to determine how to fulfill your reasonable accommodation request. The MHB may require documentation to support your reasonable accommodation request(s).

Signatures

Applicant/Resident/Participant	Date
MHB Representative	Date

Mobile Housing Board Reasonable Accommodation Policy and Procedures

MOBILE HOUSING BOARD

Verification of Disability

Name	Date	Address
City	State	Zip

Dear Resident/Applicant:

You have indicated that you, or a member of your household, need a reasonable accommodation because of a disability in connection with Mobile Housing Board residence, facility, program, or service. A physician, licensed health care professional, or a professional representing a social service agency or disability agency or clinic may verify this information.

Please sign and return to our office the attached Authorization for Release of Information including the name and address of your health care provider or other appropriate individual, clinic or agency that can verify the needed accommodation. The MHB is required to send the request directly to the provider and will use this information to evaluate your request for a reasonable accommodation. The MHB will keep this information confidential. If you choose not to authorize the release of this information, we may not be able to consider your reasonable accommodation request(s).

Modification/Accommodation Requested (Please be specific)			

Health Care Provider, Other Individual, Clinic, or Agency Information			
↑Name of Health Care Provider, Other Individual, Clinic, or Agency↑			
↑Address↑			
			()
City	State	Zip	Phone

Signatures	
↑Requestors Signature↑	Date
↑PHA Representative Signature↑	Date

Mobile Housing Board Reasonable Accommodation Policy and Procedures

MOBILE HOUSING BOARD

Approval of Request for Reasonable Accommodation

Date: _____

To: _____

Address _____

City, State, Zip _____

Dear Applicant or Resident:

_____ Mobile Housing Board has received and approved your request for reasonable accommodation.

Specifically, you requested:

We will provide you with the requested accommodation(s) by:

Although we have approved your request, we will not be able to complete your accommodations until:

Date: _____ Describe the reason(s) for the delay: _____

If you have any questions regarding this matter, please contact your Property Management Office:

Property Manager	Address	Phone
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If you think that this change or modification is not what you requested; if this is unacceptable; or, if you object to the length of time it will take to provide your request, you may contact the Public Housing Authority 504 Coordinator:

504 Coordinator	Address	Phone
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In addition, you may exercise your right to appeal a Housing Authority decision through the local HUD office or the U.S. Department of Justice. You may contact the local HUD office:

U.S. Department of Housing and Urban Development
Fair Housing and Equal Opportunity
Birmingham State Office
950 22nd Street, North – Suite 900
Birmingham, AL 35203-5301
Telephone: (205) 731-2633
Facsimile: (205) 731-2395

Mobile Housing Board Reasonable Accommodation Policy and Procedures

MOBILE HOUSING BOARD

Denial of Request for Reasonable Accommodation

Date: _____
To: _____
Address: _____
City, State, Zip: _____

Dear Applicant or Resident:

_____ Mobile Housing Board has received your request for reasonable accommodation.

Specifically, you requested:

✓ One	Your request has been denied for one or more of the below reasons.
	You do not meet the definition of a “qualified individual with a disability” as explained in the “Reasonable Accommodation Policy” and, therefore, we are not required to provide you with a reasonable accommodation.
	We have determined that your request is not “reasonable” for the following reasons: <div style="border: 1px solid black; height: 20px; margin-top: 5px;"> </div> <div style="border: 1px solid black; height: 20px; margin-top: 5px;"> </div>
	Your requested accommodation is structurally infeasible for the following reasons: <div style="border: 1px solid black; height: 20px; margin-top: 5px;"> </div> <div style="border: 1px solid black; height: 20px; margin-top: 5px;"> </div>
	Your requested accommodation would result in a fundamental alteration in the nature of our program for the following reasons: <div style="border: 1px solid black; height: 20px; margin-top: 5px;"> </div> <div style="border: 1px solid black; height: 20px; margin-top: 5px;"> </div>
	Your requested accommodation would result in an undue financial and administrative burden for the PHA for the following reasons: <div style="border: 1px solid black; height: 20px; margin-top: 5px;"> </div> <div style="border: 1px solid black; height: 20px; margin-top: 5px;"> </div>

Although we were unable to approve your specific reasonable accommodation request(s), we would like to give you the opportunity to meet with us to discuss an equally effective accommodation that may meet your needs. You may bring a friend, advocate, or attorney with you to meet with us. To schedule a meeting please notify the person below:

Name	Address	Phone

In addition, you may exercise your right to appeal MHB’s decision through your local HUD office or the U.S. Department of Justice. You may contact the local HUD office at:

U.S. Department of Housing and Urban Development
 Fair Housing and Equal Opportunity
 Birmingham State Office
 950 22nd Street, North – Suite 900

Mobile Housing Board
Reasonable Accommodation Policy and Procedures

Birmingham, AL 35203-5301
Telephone: (205) 731-2633
Facsimile: (205) 731-2395

MOBILE HOUSING BOARD RENT POLICY

I. Policy Statement

This policy applies to all residents and addresses the manner in which residents must pay their monthly rent, and the consequences of late payment or non-payment. This policy is consistent with the laws of the State of Alabama, the U.S. Department of Housing and Urban Development (HUD) regulations, and the Authority's Dwelling Lease. Mobile Housing Board is committed to enforcing this policy in an equitable and non-discriminatory manner.

The Rent Collection Policy is designated to achieve the following goals:

- Reduce Mobile Housing Board's tenant accounts receivables to 2% or less.
- Clarify the Agency's position regarding rent collection.
- Establish strict guidelines extending rent payments only in extenuating circumstances as defined by Mobile Housing Board.
- Streamline and simplify the summary process actions taken by Mobile Housing Board.

II. Monthly Rent

Rents are due and payable on or before the first day of each month. The monthly rent must be paid in full; no partial payments will be accepted. Rent is late after the 5th day of each month.

III. Rent Payments

Rents are due and payable on or before the first of each month. Personal checks, money orders and cashier's checks are the only acceptable forms of payment. Personal checks returned by a bank to the MHB for insufficient funds are subject to a \$_____ charge. The MHB reserves the right to refuse personal checks. If a family has a check returned for insufficient funds, all future payments must be made by money order or cashier's check.

Payments are accepted by mail, or in person, at the management offices.

Management offices are open Monday through Friday (except holidays)
8:00 a.m. to 4:30 p.m.

MOBILE HOUSING BOARD RENT POLICY

IV. Late Charges

Any resident who fails to pay rent due by 5th day of the month is considered delinquent. Effective on the 6th day of the month, a late charge of \$50.00 per month is assessed. This charge is in addition to rent and other charges due. Late charges continue to be assessed in subsequent months if any portion of the rent remains unpaid.

V. Rent Disputes

Residents who wish to dispute the amount of rent or other charges due may do so through the MHB's Grievance Procedure. Before a hearing can be requested involving the amount of rent as defined in the Dwelling Lease, the complainant must comply with Section 6: Escrow Deposits Required for a Hearing Involving Rent of the Mobile Housing Board Grievance Procedure. A copy of the Grievance Procedure is available in each office. Management staff can assist residents in obtaining a grievance conference and any subsequent hearing. The MHB enforces the escrow requirement contained in the Grievance Procedure.

Whether or not a resident chooses to exercise his/her rights under the Grievance Procedure, he/she may present the case in court if the MHB initiates legal action.

VI. Repayment Agreements

In extenuating circumstances, residents may request a Repayment Agreement, extending the time allowed to pay rent and other charges. The MHB is under no obligation to approve and execute repayment agreements and does so only as an accommodation to the resident. Repayment agreements will not be made for one month's current rent due. No more than two (2) agreements will be granted in any twelve (12) month period.

If a resident is assessed for retroactive rent, maintenance charges, or legal fees, the resident must either pay the total amount due on demand or sign a Repayment Agreement. Residents who are not in good standing will not be eligible to for a repayment agreement and all monies will be due upon demand.

The Manager has the authority to approve repayment agreements if the following conditions are met:

1. A down payment of 20% is required. In extenuating circumstances, management may waive the down payment.
2. The Agreement stipulates that full payment will be made in no more than 36 months. Cases of extreme hardship will require approval of the Executive Director or his/her designee. It will be the responsibility of the resident to prove extreme hardship.

MOBILE HOUSING BOARD RENT POLICY

Other foreseen circumstances that typically pose financial hardships (i.e. loss of job, permanent discontinuation or reduction in benefits) entitle residents to rent reductions effective the first of the month following the change once reported. Therefore, they are not grounds for extending payments. Residents who need assistance in coping with financial problems are invited to contact their Manager and/or the MHB resident services staff. Information and referral services to community agencies can be provided.

4. Both rent and the monthly repayment agreement installment are due on the first day of each month. Partial payments will not be accepted. Failure to pay as agreed rescinds the repayment agreement and in the entire unpaid balance becomes due.

VII. Summary Process Action

Non-payment of rent is considered a serious violation of the Lease or Agreement between the resident and the MHB. In all cases, the MHB will aggressively pursue collection of the amount due and eviction. Following is a description of all steps taken and notices issued in connection with summary process actions.

1. A “14-Day Notice” (Nonpayment of Rent/Lease Termination Notice) is sent by first class mail or hand delivered to each delinquent resident on or about the 6^h day of the month. This notice informs the resident that payment has not been received and the MHB has terminated his/her Lease. The notice further informs the resident of his/her right to cure by paying the delinquent amounts owed. The notice offers the resident an opportunity to request a hearing with the MHB in accordance with the Grievance Procedure which requires the resident to pay all rent due into an escrow account.

The notice provides the number of days by which the resident may act and avoid legal action. If a resident offers full payment by that date, the payment will be accepted, and no further action will be taken. However, the MHB will proceed with legal action by the deadline, if the resident has not:

- requested a hearing in accordance with the Grievance Procedure,
 - paid his/her rent in full, or
 - vacated the apartment.
2. Unlawful Detainers – If filed with court commencing legal action, the Managers will be authorized to determine whether to accept full or partial rent payment and discontinue the legal action in accordance with this policy and the ACOP. The unlawful detainer demands possession of the apartment and/or full payment of the balance due. A Summons is hand

MOBILE HOUSING BOARD RENT POLICY

delivered to the resident by a sheriff with a copy of the complaint. The Summons requires the resident to file an “Appearance” and an answer in court. If the resident answers the summons, the case is brought before the Judge and a decision is rendered.

VIII. Discontinuing Eviction Action

The MHB is under no obligation to discontinue eviction actions once the court judgment is awarded or the Writ of Restitution is served. However, it is not in the interest of either party for the MHB to proceed with an eviction against a resident who is generally a prompt rent payer. If eviction action commences against a resident, the MHB may accept full payment, if offered, at any time up to the day of evictions and reinstate the resident.

IX. Resident Eviction Expenses

Once a judgment is obtained against a resident, the resident may be subject to payment of court costs and attorney’s fees in effect at the time of the Hearing on the Complaint. These costs are included in the full amount due and payable by the resident before the MHB will consider discontinuing legal action. The MHB reserves the right to pursue collection of all amounts properly due from residents evicted or voluntarily vacating MHB premises. The MHB will utilize all available means of collection including referrals to collection agencies, the Alabama Department of Revenue and court actions.

X. Utility Reimbursement Checks

Utility reimbursement payments will be applied to open charges prior to the issuance of a check to the resident. Utility Reimbursement checks will be mailed out to residents monthly.

XI. Enforcement of this Policy

This policy is enforced by the staff and legal counsel of the MHB. Only the Executive Director (or his/her designee) has the authority to waive any provision of this policy after careful consideration of the facts in a specific case.

1. Rent Determination Policies

The amount of monthly rent that a family pays to the housing agency is based on one of the following methods:

MOBILE HOUSING BOARD RENT POLICY

- a. Income Base Rent – Rent based on 30% of the adjusted monthly income.
- b. Flat Rent – The market value of the unit as set by the study conducted by the HA in accordance with HUD rules and regulations. No utility allowances can be deducted from the flat rent amount.
- c. Minimum Rent – MHB established minimum monthly rent of \$50.00 for its developments.
- d. Ceiling Rent – Once the PHA has established flat rents, ceiling rents should be set to the level required for flat rents (which will require the addition of the utility allowance to the flat rent for properties with tenant – paid utilities).

3. Annual Resident Rent Choice

The resident choice provision allows a family in public housing a choice of rental payments. Residents may choose rental payments, based on either a flat rent or the income-based rent method. Residents may choose to pay the income-based rental payment, which is 30% of their adjusted monthly income. In the event a family's income decreases due to financial hardship, residents may elect to pay an income-based rent because the higher flat rent is no longer affordable.

Income of a family paying a flat rent must be reviewed not less than once every three years. Income of a family paying income-based rents must continue to be reviewed once a year.

4. Police Living in Public Housing (Special Rent Terms)

For the sole purpose of providing increased security to its development, MHB may house police officers in the developments. MHB may allow a police officer who is not otherwise eligible for federal housing assistance to receive assistance in public housing.

D. RESIDENT CHARGES IN ADDITION TO RENT

1. A schedule of charges is included in the Resident Charge List and attached to the Dwelling Lease and incorporated lease by reference. Resident charges include the replacement of resident identification cards, keys, key cards, yard fines, set fines and copying fees. Residents who damage their units and/or common areas or vandalize MHB property should be charged for the cost of repairs, and actions should be taken for lease enforcement according to the severity and/or frequency of the

MOBILE HOUSING BOARD RENT POLICY

violation. Residents, maintenance, and management need to communicate regularly to inform each other when they encounter these situations, maintaining strict confidentiality to prevent reprisals.



151 South Claiborne Street, Mobile, AL 36602

SECTION 3 POLICY
FOR
MOBILE HOUSING BOARD

Prepared: December 12, 2019

Board Approval and Adoption: _____

SECTION 3 POLICY

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I. EXECUTION STATEMENT AND HIRING PREFERENCE CONFLICT

This policy is developed for the Mobile Housing Board for the exclusive use of the agency, hereafter referred to as MHB, its contractors, subcontractors, bidders, developers, sub-grantees, related affiliates, or instrumentalities, partnering local government entities, and any other sub-recipients of covered funding in partnership with MHB. The funding type and program/grant names may change over the years; however, the intent of this policy is to encompass all applicable funding from the U.S. Department of Housing and Urban Development (HUD). All hiring and contracting must meet any conflict of interest requirements set forth in federal, state, or local laws, regulations, or policies and comply with the internal MHB hiring policies. It has been determined based on a comprehensive review of the Mobile County Personnel Board Rules, Laws, and Acts that the current application and ranking processes employed as part of the hiring of new staff conflicts with the Preference requirements of Section 3. The alternative approach to ensure Section 3 Preference is applied is covered in the Internal Procedures component of this policy starting on page 25.

II. BACKGROUND ON THE SECTION 3 REGULATION

The purpose of Section 3 of the Housing and Urban Development Act of 1968, as amended by Section 915 of the Housing and Community Development Act of 1992, is to “ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State, and local laws and regulations, be directed toward low and very low-income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons.”

Consistent with 24 CFR Part 135, as a recipient of HUD Public Housing funding, the Mobile Housing Board (MHB) requires fulfillment of Section 3 obligations on all contracts that make use of that assistance.

These policies are implemented regardless of the contract amount, whether it is designated as housing construction, housing rehabilitation, or other public construction project, or whether it is any other non-construction expenditure resulting from the use of covered operating funding, modernization funding, or development funding from HUD .

MHB works to ensure the provision of employment, training, contracting, and other economic opportunities to its residents and other low-income persons. In doing so, MHB utilizes Section 3 as a means of promoting stability and self-sufficiency to Section 3 Residents. Implementation procedures may be amended periodically by MHB to ensure that the policy requirements are being met and/or to enhance the efficiencies of compliance.

III. APPLICABILITY

Section 3 requirements apply to all projects and activities funded in whole or in part with covered funds. If any HUD funding is used for the project/activity, then the entire project budget is then subject to Section 3 regulations.

Section 3 requirements do not apply to projects and activities of MHB that do not receive any HUD funding, such as non-subsidized market rate developments owned by MHB.

Section 3 requirements do not apply to any agreement or contract for the purchase of supplies and materials only.

IV. DEFINITIONS

Please refer to the 24 CFR 135.5 for a full list of prevailing definitions found in the regulation.

RECIPIENT: Any entity which receives Section 3 covered funding, directly from HUD or from another recipient and includes, but is not limited to, any State, unit of local government, Public Housing Authority, Indian Housing Authority, Indian Tribe, or other public body, public or private nonprofit organization, private agency or institution, mortgagor, developer, limited dividend sponsor, builder, property manager, community housing development organization, resident management corporation, resident council, or cooperative association. Recipient also includes any successor, assignee, or transferee of any such recipient, but does not include any ultimate beneficiary under the HUD program to which Section 3 applies and does not include contractors.

CONTRACTOR: Any entity which contracts to perform work generated by the expenditure of section 3 covered assistance, or for work in connection with a section 3 covered project.

SUBCONTRACTOR: Any entity (other than a person who is an employee of the contractor) which has a contract with a contractor to undertake a portion of the contractor's obligation for the performance of work generated by the expenditure of Section 3 covered assistance, or arising in connection with a section 3 covered project.

NEW HIRES: Full-time employees for permanent, temporary, or seasonal employment opportunities.

EMPLOYMENT OPPORTUNITIES GENERATED BY SECTION 3 COVERED ASSISTANCE: All employment opportunities generated by the expenditure of Section 3 covered funding (i.e. operating funding, Development funding, and modernization funding) and with respect to Section 3 covered housing and community Development funding, all employment opportunities arising in connection with Section 3 covered projects, including management and administrative jobs (including architectural, engineering, or related professional services and jobs directly related to administrative support of these activities) connected with the Section 3 covered project.

SECTION 3 RESIDENT: A Section 3 resident is:

- A. A public housing resident or Housing Choice Voucher holder; or

- B. An individual who resides in the metropolitan area in which the Section 3 covered assistance is expended, and is a low-income person or a very low-income person.

METROPOLITAN AREA: The metropolitan area means a metropolitan statistical area (MSA) as established by the U.S. Office of Management and Budget. For MHB, the MSA area determined by HUD is the "Mobile Housing Board MSA".

LOW-INCOME PERSON: Families (including single persons) whose incomes do not exceed 80% of the median income for the area as determined by HUD.

Please refer to www.huduser.org/portal/datasets/il.html for current, local Income Limit information.

- ❖ Select current year.
- ❖ Select "Access Individual Income Limit area"
- ❖ Select "click here for FY XXXX IL Documentation" (where XXXX is the current fiscal year)
- ❖ Select State & County

VERY LOW-INCOME PERSON: Families (including single persons) whose incomes do not exceed 50% of the median family income for the area as determined by HUD.

SECTION 3 BUSINESS CONCERN: A Section 3 business concern is one:

- A. That is fifty-one percent (51%) or more owned by Section 3 residents; or
- B. Whose permanent, full-time employees includes persons, at least 30 percent of whom are current Section 3 residents, or within three years of the date of first employment with the Section 3 business concern were Section 3 residents; or
- C. That provides evidence of a commitment to subcontract a minimum of 25 percent of the total contract award amount (including any modifications) to Section 3 business concerns that meet the requirements described in A or B. Example: If the Contract Amount is = \$1,000,000, contractor must subcontract at least 25% or \$250,000 to Section 3 business concern(s) as defined in A or B in this part.

RESIDENT-OWNED BUSINESS (ROB): As described in 24 CFR Part 963, a resident-owned business is a business concern owned or controlled by public housing residents. "Owned and controlled" means a business (a) at least 51% owned and operated by a public housing resident; and (b) whose management and daily business operations are controlled by one or more such individuals. If for a specific procurement, MHB decides to elect the alternative procurement process found in 24 CFR Part 963 for a limiting the solicitation only to ROB, the ROB must also meet the additional eligibility and other requirements described in the regulations.

SECTION 3 CLAUSE: The contract provisions set forth in 24 CFR 135.38 and which must be included in all Section 3 covered contracts.

SECTION 3 COVERED ACTIVITY: Any activity that is funded by Section 3 covered funding.

SECTION 3 COVERED ASSISTANCE: With respect to public housing authorities, Section 3 covered assistance means HUD assistance to which the obligation to provide training, employment, contracting, and other economic opportunities under Section 3 apply, including: (1) Public housing development assistance; (2) Public housing operating assistance; (3) Public housing modernization assistance; and (4) any other HUD funds, regardless of HUD program, utilized for the operation, modernization, or rehabilitation of public housing properties or developments as defined under statutes.

SECTION 3 COVERED CONTRACT: A contract or subcontract (including a professional service contract) awarded by a recipient or contractor for work generated by the expenditure of Section 3 covered assistance or for work arising in connection with a Section 3 covered project. "Section 3 covered contracts" do not include contracts for the purchase of supplies and materials. However, whenever a contract for materials includes the installation of the materials, the contract constitutes a "Section 3 covered contract."

SECTION 3 COVERED PROJECT: The construction, reconstruction, conversion or rehabilitation of housing (including reduction and abatement of lead-based paint hazards), other public construction which includes buildings or improvements (regardless of ownership) assisted with housing or community development funding.

SECTION 3 JOINT VENTURE: An association of business concerns, one of which qualifies as a Section 3 business concern, formed by written joint venture agreement to engage in and carry out a specific business venture for which purpose the business concerns combine their efforts, resources, and skills for joint profit, but not necessarily on a continuing or permanent basis for conducting business generally, and for which the Section 3 business Concern:

- Is responsible for a clearly defined portion of the work to be performed and holds management responsibilities in the joint venture; and
- Performs at least 25% of the work and is contractually entitled to compensation proportional to its work.

V. SECTION 3 GOALS AND PREFERENCES

It is MHB's policy to achieve Section 3 goals by providing opportunities in one or more of the following areas:

A. Training and Employment Opportunities for Section 3 Residents:

When the Section 3 regulation is triggered by the need for new hires, MHB and its contractors and subcontractors will make every effort within their disposal to the greatest extent feasible to attempt to hire Section 3 residents amounting to at least 30% of the aggregate number of full-time new hires.

When hiring opportunities are offered and all requirements are met and remain equal, MHB, contractors and subcontractors shall direct their efforts to hire Section 3 residents in the order of priority preference provided below:

1. Residents at the housing development or developments where the work is being performed (Category 1 residents).
2. Residents of other MHB public housing developments and holders of housing choice vouchers (Section 8 rent assistance) managed by MHB (If applicable) (Category 2 residents).
3. Participants in Youthbuild programs being carried out in the metropolitan area in which the Section 3 covered assistance is expended (Category 3 residents).
4. Other Section 3 residents (Category 4 residents).

B. Contracting Opportunities for Section 3 Business Concerns:

When the Section 3 regulation is triggered by the need for subcontracting a portion of the work to another business, MHB and its contractors and subcontractors will make every effort within their disposal to the greatest extent feasible to attempt to subcontract:

- A. **Building Trades:** At least 10% of the total dollar amount of all Section 3 covered contracts or purchase orders for building trades work maintenance, repair, modernization, or development of public housing to Section 3 business concerns.
- B. **Other contracts (non-building trades):** For other Section 3 covered contracts or purchase orders that are not building trades work covered above, the goal is to subcontract at least 3% of the total dollar amount to Section 3 business concerns. This includes professional service contracts such as legal, architects, engineers, consultants, or any other contract or purchase order for services that are not building trades work.

When contracting opportunities are offered and all requirements are met and remain equal, MHB, contractors and subcontractors shall direct their efforts to contract/subcontract with Section 3 business concerns in the order of priority preference provided below:

1. Business concerns that are 51 percent or more owned by residents of the housing development or developments for which the section 3 covered assistance is expended, or whose full-time, permanent workforce includes 30 percent of these persons as employees (category 1 businesses).
2. Business concerns that are 51 percent or more owned by residents of other public housing developments or developments managed by MHB or by holders of housing choice vouchers managed by MHB, or whose full-time, permanent workforce includes 30 percent of these persons as employees (category 2 businesses).
3. Youthbuild programs being carried out in the metropolitan area (or non-metropolitan county) in which the section 3 covered assistance is expended (category 3 businesses).
4. Business concerns that are 51 percent or more owned by other section 3 residents, or whose permanent, full-time workforce includes no less than 30 percent section 3 residents (category 4 businesses), or that subcontract in excess of 25 percent of the total amount of subcontracts to business concerns identified in paragraphs 1 and 2 above.

VI. SELF-CERTIFICATION OF SECTION 3 RESIDENTS AND SECTION 3 BUSINESS CONCERNS

In order to receive preference as a Section 3 resident or a Section 3 business concern, the resident or business must self-certify that they meet the eligibility requirements. MHB has developed self-certification forms for both Section 3 residents and Section 3 businesses and which are included as Section 3 Form #4 and Section 3 Form #2, respectively.

A Section 3 resident seeking preference in employment must fulfill the requirements/qualifications of the sought position. If asked, they also must provide evidence of their Section 3 status (e.g., receipt of public assistance, address of residency, etc.).

A Section 3 business concern seeking preference in contracting must submit evidence to demonstrate that they are responsible firms and have the ability to perform successfully under the terms and conditions of the proposed contract. If asked, they also must provide evidence of their Section 3 status.

It is important to note that all persons and/or business concerns are self-certifying their eligibility under Section 3 to MHB and to HUD, and that severe civil and/or criminal penalties may apply for false certifications.

VII. CONTRACTOR RESPONSIBILITIES IN MEETING SECTION 3 GOALS

All contractors are held to the same Section 3 compliance requirements of MHB as listed in Section V above (Section 3 Goals and Preferences). The MHB Section 3 policy requires that when the Section 3 regulation is triggered by a need for new hires or by a need to subcontract a portion of the work, every effort within the contractor's disposal must be made to the greatest extent feasible to direct all available employment, training and contracting opportunities to Section 3 residents based on the priorities described in Section V.

Contractors must also proactively facilitate compliance with Section 3 subject to the definition of a Section 3 Covered contract. Contractors will have fulfilled their responsibility when they can provide evidence that the following have occurred in the case of every hiring, contracting, solicitation and recruitment effort:

- A) Extra or greater efforts in notifying Section 3 residents of opportunities through posting job openings in the offices of procurement, in the local media, and on the MHB website;
- B) Conveying that the hiring/contract work is a Section 3 Covered opportunity in any advertisement for bids and proposals by placing the following language in each advertisement/public notice and website, **"This job/project is covered under the requirements of Section 3 of the HUD Act of 1968"**
- C) Notifying subcontractors in each pre-bid meeting of the Section 3 requirements;
- D) Incorporating the full HUD mandated Section 3 clause directly into all contracts and subcontracts;
- E) Providing "Section 3 Resident Self-Certification Forms" for employment at the contractor/subcontractor business offices and allowing applications to be submitted at appropriate local locations;
- F) Encouraging the training of Section 3 residents by the subcontractors;
- G) Facilitating an opportunity or job fair for the contractor and subcontractor to meet interested Section 3 residents for possible employment. A list can be developed as a resource for contractors when seeking to hire Section 3 workers in the future;
- H) Facilitating an opportunity fair annually for small contractors to meet large prime contractors interested in bidding work awarded by MHB;

- I) Documenting actions taken to comply with Section 3 requirements including all results and impediments using the MHB prescribed mechanism or form;
- J) Reporting on its efforts regarding Section 3 implementation using the MHB prescribed mechanism or form;
- K) Refusing to award contracts to businesses or persons who have previously violated Section 3 requirements;
- L) Posting all job sites funded by MHB with a location or phone number of whom and how to apply for any opportunities for employment, training or contracting. The sign should be no smaller than 24" x 24" in Black ink and specifically read: **"This project is covered under Section 3 of the HUD Act of 1968 which requires that any new opportunities be directed to low- and very low income persons in this community. Please contact (list the contact person name and number) for information on any Employment, Contracting, and Subcontracting opportunities."**
- M) Including the MHB Section 3 Policy in every Section 3 covered procurement.
- N) All Section 3 covered procurements must be communicated to current and potential Section 3 contractors and residents as part of the bid process before final bids or applications are submitted to MHB and its contractors.
- O) Any contractor or subcontractor self-certifying itself as a Section 3 business concern must maintain that status throughout the life of the contract. Any change in status must be reported to the Section 3 Coordinator immediately.
- P) Exercising all efforts indicated below regarding notice, encouragement, and facilitation as indicated below.

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<p style="text-align: center;">REQUIREMENTS</p> <p style="text-align: center;"><i>Applicable to all awards and contracts DESPITE AMOUNT</i></p>	<p style="text-align: center;">ADDITIONAL INFORMATION</p>	<p style="text-align: center;">WHEN EXECUTED</p>
<p>NOTICE - Extra or greater efforts must be undertaken to make the low and very low-income persons in the project area aware of the existence of the opportunity before it is filled with non-Section 3 persons or businesses. This means the notice MUST be given in multiple methods (See Part VII of this policy for a list of methods) and documentation saved for audit purposes.</p> <p>As an example, contractors, sub-contractors and developers cannot simply call their normal service providers and contractors for bids without including a host of notices to other low-income people, groups and organizations locally and beyond before committing to any contracts or potential contracts.</p> <p>Remember to keep every document and record demonstrating your efforts for audit and verification. If there are no records verifying the efforts made, it will be assumed there were none. The contractor, sub-contractor, and developer will also have access to the MHB Section 3 Business Concern and Resident Listings as indicated in Part VI above.</p>	<p>This applies to all contracts using Section 3 covered assistance from HUD and begins prior to the securing of the first contract service related to the proposed project including, professional services such as legal, architecture, engineering, consultants, etc.</p>	<p>Give notice to residents and businesses before or while soliciting bids/proposals/ employees</p> <p>Notice must be provided prior to the execution of any contracts via: publication, flyers, posters, social media, email, letters, web-postings and any other such method elected</p>
<p>ENCOURAGEMENT - Contractors, sub-contractors and developers must be able to document they did something to encourage low-income people, the businesses they own and the businesses that substantially employ them to apply for their opportunities before filling them with non-Section 3 people or businesses. This includes activities such as hosting opportunity fairs for contracting and employment, informational sessions on how to achieve Preference in consideration or other verifiable methods designed to enhance participation by these groups.</p> <p>MHB requires that contractors, sub-contractors, and developers review and consider the listings of self-certified Section 3 residents and business concerns both initially and if new opportunities open during the contract life. However, , contractors, subcontractors and developers should also do other encouragement and outreach efforts to the extent that new Section 3 persona and businesses can be attracted and secured if qualified. There is no requirement to hire or contract any unqualified person or business.</p>	<p>These shall be in the form of: Opportunity Fairs, Meetings, Presentations, Inducements such as Transportation or Child Care Assistance, etc.</p> <p>Most importantly you must use the attached forms when bidding and you must often mention Preference during meetings</p>	<p>This is executed prior to every major contract and annually for all small purchases but definitely before awarding any contracts or employment</p> <p>It's important this be done early so the contracting phase can begin immediately after confirmation of award</p>
<p>FACILITATION - Contractors, sub-contractors, and developers must be able to provide documentation in the form of actual signed agreements or commitments to contract and employment verification like payrolls or offers of employment they facilitated in compliance with the actual award of contracts and/or employment based on what opportunity was available.</p>	<p>Because there are various phases of contracting in a project, this step must be central to the award of contracts</p>	<p>This must be completed at every step in the contracting and employment phase from pre-award through the life of the project.</p>

As MHB does not execute subcontracts, MHB is reliant upon the compliance of its general contractors to execute an aggressive Section 3 initiative. If the overall Section 3 goals above cannot be met by the contractor, other training and economic opportunities may be provided to Section 3 residents and contractors when such opportunities are mutually beneficial to MHB and the specific group. These opportunities may be exercised only with written MHB prior agreement and satisfactory documentation explaining why employment or contracting respectively could not or should not be met.

However, contractors are expected to do everything possible and feasible to ensure all opportunities are directed to MHB residents first. This requirement includes all labor-regulated agreements with union contractors. Examples include:

1. Distributing or posting flyers advertising positions to be filled
2. Review and consider the Section 3 Resident List provided by MHB prior to making new hires. If those hired are not Section 3 residents, or are in a lower preference category, the Contractor must explain in writing the qualifications that those on Section 3 Resident List lacked, or other reason for non-hire (e.g., job offer declined).
3. Notify the local workforce development board about open positions
4. Holding job informational meetings for residents, contractor, etc.

Additionally, MHB expects that contractors shall, to the greatest extent feasible, ensure that Section 3 new hires work approximately the same number of hours as other new hires in similar positions on the project.

Contractors must submit with any bid or proposal the prescribed forms describing the implementation of Section 3, including:

- Section 3 Form 1: Section 3 Clause
- Section 3 Form 2: Section 3 Business Concern Self-Certification form (for prime contractor and sub-contractors)
- Section 3 Form 3: Contractor Section 3 Assurance of Compliance and Action Plan

Contractors and subcontractors must keep on file all completed Section 3 Form 4: Section 3 Resident Self-Certification and Skills Data form for any and all applicants for positions you are hiring for related to the MHB project and for all Section 3 new hires.

In the absence of evidence to the contrary, a contractor that meets the minimum numerical goals set forth in this section will be considered to have complied with the Section 3 Preference requirements.

In evaluating compliance under this part, a contractor that has not met the numerical goals set forth in this section has the burden of demonstrating why it was not feasible to meet the numerical goals set forth in this section. Such justification may include impediments encountered despite actions taken. Contractors also can indicate other economic opportunities, such as those listed below, which were provided in its efforts to comply with Section 3 and the requirements of this part.

Contractors must also report the following information to MHB regarding any new hires by contract or subcontract: (1) name of new hire; (2) position or title; (3) number of hours worked; (4) whether the new hire is a Section 3 resident; (5) which Section 3 priority preference category the Section 3 resident belongs to; (6) if the new hire is not a Section 3 resident or is a lower category Section 3 resident, the number of all Section 3 resident applicants passed over in favor of the non-Section 3 hire or the lower-category Section 3 hire.

VIII. OTHER ECONOMIC OPPORTUNITIES TO ACHIEVE CONTRACTOR COMPLIANCE

A. A contractor may provide one or more of the following "other economic opportunities" under this subsection:

i. Training and Employment: "Training and Employment" related opportunities would be designed to train and/or employ Section 3 residents **at a minimum rate of 3% of total contract value**. A detailed plan for training should be described in a written narrative and provided for MHB review. Contractors seeking to provide training may identify a qualified training firm that has the proper experience working with low-income and public housing residents in particular. The contractor may procure the training firm/individual at its expense to provide direct recruitment and solicitation to MHB residents for employment related training. Verification of the agreement between the contractor and training firm/individual must be provided to MHB's Section 3 Coordinator.

ii. Other Results-Oriented Economic Opportunities: "

Other Results-Oriented Economic Opportunities" are results-oriented and quantifiable programs designed to provide economic opportunities to Section 3 residents, including, but not limited to: Section 3 joint ventures, teaming agreements or combination of other economic opportunities. A contractor must submit to MHB a plan detailing these "Other Results-Oriented Economic Opportunities" and receive an approval prior to implementation.

IX. INTERNAL HIRING FOR MHB STAFF POSITIONS:

The employment policy of the Mobile Housing Board (MHB) is to hire the best-qualified applicants and extend equal employment opportunity practices to all qualified individuals. The company will not discriminate on the basis of race, color, religion, sex, national origin, veteran status, disability, age or any other characteristic protected from discrimination by applicable federal, state or local law.

MHB complies with Section 3 of the Housing and Urban Development Act of 1968. To the greatest extent feasible, at least thirty-percent (30%) of the aggregate annual number of its internal new hires will be residents and other Section 3 eligible persons. MHB seeks to provide current staff with growth opportunities as well, and will allow for a one-week internal posting period before following the efforts listed in Part IV of this policy. See the MHB Human Resource Policy for all of the hiring practices.

X. COMPLAINTS:

This policy is governed by the 24 CFR Part 135 - Section 3 Regulation and any future changes thereto. Any Section 3 resident or business concern that feels that the Section 3 regulations were not complied with may file a complaint directly to the Assistant Secretary for Fair Housing and Equal Opportunity at the following internet address: <http://portal.hud.gov/hudportal/documents/huddoc?id=958.pdf>

XI. COMPLIANCE MONITORING:

MHB has developed a process by which all procurements will be reviewed to ensure the maximum compliance options will be executed, and all contracts are reviewed for compliance. Any certified payroll projects will have their full payrolls reviewed to catch any new hires or new contracting that has not been previously reported and confirmed. MHB has designated the following person to act as its Section 3 Coordinator. The Coordinators contact information is:

Tuwana Williams

(251) 434-2245

twilliams@mobilehousing.org



151 South Claiborne Street, Mobile, AL 36602

MOBILE HOUSING BOARD

SECTION 3 POLICY

CONTRACTOR INSTRUCTIONS AND REQUIRED FORMS SUBMITTALS

All forms must be signed and/or notarized and returned with your bid. If you have any Section 3 employees, they must complete the Resident Section 3 Self-Certification Form (page 25). If awarded a contract you **MUST** provide your current employee list at time of contract award. Any person's hired or brought on to the project/contract after the list is provided will be considered a **NEW HIRE** if they are not on the provided list. **THER WILL BE NO EXCEPTIONS!**

Prepared: December 12, 2019

<p style="text-align: center;">REQUIREMENTS</p> <p style="text-align: center;"><i>Applicable to all awards and contracts DESPITE AMOUNT</i></p>	<p style="text-align: center;">ADDITIONAL INFORMATION</p>	<p style="text-align: center;">WHEN EXECUTED</p>
<p>NOTICE - Extra or greater efforts must be undertaken to make the low and very low-income persons in the project area aware of the existence of the opportunity before it is filled with non-Section 3 persons or businesses. This means the notice MUST be given in multiple methods (See Part VII of this policy for a list of methods) and documentation saved for audit purposes.</p> <p>As an example, contractors, sub-contractors and developers cannot simply call their normal service providers and contractors for bids without including a host of notices to other low-income people, groups and organizations locally and beyond before committing to any contracts or potential contracts.</p> <p>Remember to keep every document and record demonstrating your efforts for audit and verification. If there are no records verifying the efforts made, it will be assumed there were none. The contractor, sub-contractor, and developer will also have access to the MHB Section 3 Business Concern and Resident Listings as indicated in Part VI above.</p>	<p>This applies to all contracts using Section 3 covered assistance from HUD and begins prior to the securing of the first contract service related to the proposed project including, professional services such as legal, architecture, engineering, consultants, etc.</p>	<p>Give notice to residents and businesses before or while soliciting bids/proposals/ employees</p> <p>Notice must be provided prior to the execution of any contracts via: publication, flyers, posters, social media, email, letters, web-postings and any other such method elected</p>
<p>ENCOURAGEMENT - Contractors, sub-contractors and developers must be able to document they did something to encourage low-income people, the businesses they own and the businesses that substantially employ them to apply for their opportunities before filling them with non-Section 3 people or businesses. This includes activities such as hosting opportunity fairs for contracting and employment, informational sessions on how to achieve Preference in consideration or other verifiable methods designed to enhance participation by these groups.</p> <p>MHB requires that contractors, sub-contractors, and developers review and consider the listings of self-certified Section 3 residents and business concerns both initially and if new opportunities open during the contract life. However, , contractors, subcontractors and developers should also do other encouragement and outreach efforts to the extent that new Section 3 persona and businesses can be attracted and secured if qualified. There is no requirement to hire or contract any unqualified person or business.</p>	<p>These shall be in the form of: Opportunity Fairs, Meetings, Presentations, Inducements such as Transportation or Child Care Assistance, etc.</p> <p>Most importantly you must use the attached forms when bidding and you must often mention Preference during meetings</p>	<p>This is executed prior to every major contract and annually for all small purchases but definitely before awarding any contracts or employment</p> <p>It's important this be done early so the contracting phase can begin immediately after confirmation of award</p>
<p>FACILITATION - Contractors, sub-contractors, and developers must be able to provide documentation in the form of actual signed agreements or commitments to contract and employment verification like payrolls or offers of employment they facilitated in compliance with the actual award of contracts and/or employment based on what opportunity was available.</p>	<p>Because there are various phases of contracting in a project, this step must be central to the award of contracts</p>	<p>This must be completed at every step in the contracting and employment phase from pre-award through the life of the project.</p>

Section 3 Form #1: SECTION 3 CLAUSE ACKNOWLEDGEMENT

Economic Opportunities for Low- and Very Low-Income Persons (Section 3, HUD Act of 1968; 24 CFR 135)

(a) The work to be performed under this contract is subject to the requirements of section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701u (section 3). The purpose of section 3 is to ensure that employment and other economic opportunities generated by HUD assistance or HUD-assisted projects covered by section 3, shall, to the greatest extent feasible, be directed to low- and very low-income persons, particularly persons who are recipients of HUD assistance for housing.

(b) The parties to this contract agree to comply with HUD's regulations in 24 CFR Part 135, which implement section 3. As evidenced by their execution of this contract, the parties to this contract certify that they are under no contractual or other impediment that would prevent them from complying with the Part 135 regulations.

(c) The contractor agrees to send to each labor organization or representative of workers with which the contractor has a collective bargaining agreement or other understanding, if any, a notice advising the labor organization or workers' representative of the contractor's commitments under this section 3 clause, and will post copies of the notice in conspicuous places at the work site where both employees and applicants for training and employment positions can see the notice. The notice shall describe the section 3 preference, shall set forth minimum number and job titles subject to hire, availability of Section 3 apprenticeship and training positions, the qualifications for each; and the name and location of the person(s) taking applications for each of the positions; and the anticipated date the work shall begin.

(d) The contractor agrees to include this section 3 clause in every subcontract subject to compliance with regulations in 24 CFR Part 135, and agrees to take appropriate action, as provided in an applicable provision of the subcontract or in this section 3 clause, upon a finding that the subcontractor is in violation of the regulations in 24 CFR Part 135. The contractor will not subcontract with any subcontractor where the contractor has notice or knowledge that the subcontractor has been found in violation of the regulations in 24 CFR Part 135.

(e) The contractor will certify that any vacant employment positions, including training positions, that are filled (1) after the contractor is selected but before the contract is executed, and (2) with persons other than those to whom the regulations of 24 CFR Part 135 require employment opportunities to be directed, were not filled to circumvent the contractor's obligations under 24 CFR Part 135.

(f) Noncompliance with HUD's regulations in 24 CFR Part 135 may result in sanctions, termination of this contract for default, and debarment or suspension from future HUD assisted contracts.

I have read and understand these requirements of this Section 3 funded project:

Business Name: _____

Business Address: _____

Print Name: _____

Signature

Date

<p>Please return this form to the following email or with your bid/proposal/response as instructed:</p> <p style="text-align: center;"><i>Section 3 Coordinator for Mobile Housing Board</i> Tuwana Williams twilliams@mobilehousing.org</p>	<p style="text-align: center;">The Mobile Housing Board 's Section 3 Self Certification</p> <p>For assistance completing the documents contact Tuwana Williams (251) 434-2245 twilliams@mobilehousing.org</p>
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Section 3 Business Criteria: Your business is eligible for Section 3 Business Certification if it meets any one of the following criteria. Please note that the definition of Section 3 qualified person is on Section 3 Form #3, "Section 3 Resident Self-Certification Form." Please check only one Preference you are electing.

- Fifty-one percent or more of your business is owned by a Section 3 resident or residents.
- Thirty percent or more of your permanent, full-time employees are Section 3 residents.
- You can provide evidence of a commitment to subcontract in excess of 25 percent of the amount of all subcontracts to Section 3 businesses: (a) that are fifty-one percent or more owned by public housing residents or (b) that has thirty percent or more of their permanent, full-time employees as public housing residents.

Section 3 Business Certification Statement: I hereby certify to the U.S. Department of Housing and Urban Development (HUD) and to the Mobile Housing Board that all of the information on this form is true and correct. I understand that it is my responsibility to conduct any due diligence necessary to make this certification and to maintain documentation establishing my Section 3 Business concern status. I also understand that failure to complete this form completely and accurately may result in debarment or other administrative remedies available to HUD, and criminal or civil penalties under federal, state, and local laws.

- My business is a Section 3 business in accordance with the standard checked above under Section 3 Business Criteria.
- My business is not a Section 3 business.

Signature:		Date Signed:
Name:	Title:	
Company Name		
Address		
Phone:	Email:	
Type of Business: (Check One): <input type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> Sole Proprietorship <input type="checkbox"/> Other		

PART I-- Purpose: To ensure that regulations promulgated under 24 CFR Part 135 "Economic Opportunities for Low- and Very Low-Income Persons" is met, MHB has developed and approved a Section 3 Policy for MHB. Information on specific compliance with Section 3 is found in MHB's Section 3 Policy, or in the regulations at 24 CFR Part 135.

This form, along with all related required documents included shall serve as the 'assurance of compliance' certification and action plan as required in the bid documents, supplemental general conditions, and required forms for the contract for any HUD work funded by MHB.

Name of Business: _____

Business Address: _____

Contract Name/Solicitation #: _____

Total amount of Bid: _____

PART II: PRIOR COMPLIANCE CERTIFICATION

I am certifying that my business has complied with the HUD Section 3 regulations in its past HUD contracts/ purchase orders .

Signature/Title

Print Name

Date

PART III: IS SECTION 3 TRIGGERED BY THIS CONTRACT?

IF CONTRACTOR DOES NOT ANTICIPATE TRIGGERING THE SECTION 3 REGULATIONS, YOU MUST INITIAL BOTH LINES BELOW:

_____ I do not anticipate hiring any new permanent, temporary, or seasonal employees on this contract.

_____ I do not anticipate subcontracting any portion of the work on this contract.

If you checked both boxes, DO NOT check any other boxes or select any other options on this form!

Skip to the attestation and notarized signature on the final page of Section 3 Form #3.

IMPORTANT: IF THIS CHANGES AT ANY POINT DURING YOUR CONTRACT, you must immediately contact your MHB contract contact as well as the MHB Section 3 Coordinator.

PART VI. OTHER REQUIREMENTS

Outreach Plan:

Check all methods you will employ to hire Section 3 residents. Posting the position in community sources that are generally available to low-income residents and the general public is a standard requirement. Check at least three (3) other methods you will employ:

- The local community newspaper(s)
- The most widely distributed newspaper
- MHB website
- MHB properties management offices in a conspicuous location
- Homeless service agencies
- Local HUD-supported housing communities
- Local Workforce Board
- Other locations as approved by MHB
- Email blast residents on the MHB Section 3 Resident List
- Post notices on social media controlled by MHB

Documentation of "To the Greatest Extent Feasible":

The contractor will work with MHB Section 3 Coordinator and other designated staff to notify residents of any opportunities afforded under the contract. The contractor will partner with MHB by giving preference of any employment opportunities to the Section 3 persons or business concerns.

The contractor and subcontractor(s) shall recruit or attempt to recruit from MHB's Section 3 area, based on the priority order in MHB's Section 3 Plan, the necessary number of low-income and very low-income residents through documentation of their efforts and of any impediments to comply. MHB's contractors and subcontractors shall:

1. Maintain a list of all low-income area residents who have applied, either on their own or from referral from any source, and employ such person if otherwise qualified and if a vacancy exists.
2. Review and consider the Section 3 Resident List provided by MHB prior to making new hires. If those hired are not Section 3 residents, or are in a lower preference category, the Contractor must explain in writing the qualifications that those on Section 3 Resident List lacked, or other reason for non-hire (e.g., job offer declined).

Provide evidence that the contractor has not filled vacant employment positions in its workforce immediately prior to undertaking work in an attempt to circumvent Section 3 regulations. Review and determine if low-income residents meet minimum hiring qualifications. Applicants meeting such minimum qualifications, but not hired due to lack of job openings or for other operations reasons, will be placed on a priority-hiring list and offered positions upon the occurrence of the first available appropriate job opening.

Record-keeping:

The contractor shall maintain on file all records related to employment and job training of low-income and very low-income residents or other such records, advertisements, legal notices, brochures, flyers, publications, assurances of compliance from subcontractors, etc., in connection with this contract. If there is a report that is needed as part of the submission, you agree to provide it timely. The contractor shall, upon request, provide such records or copies of records to MHB, its staff, or agents.

Reports:

The contractor shall provide reports as required in connection with the contractor specifications. All certified and regular payrolls shall clearly detail which employees qualify under Section 3 by the contractor providing a Resident Self-Certification form #4.

Certification:

The contractor will certify that any vacant employment positions, including training positions, that filled:

- (1) after the contractor is selected but before the contract is executed; and
- (2) with persons other than Section 3 residents

were not filled to circumvent the subcontractor's obligations under 24 CFR Part 135.

Grievance and Compliance:

The contractor or sub-contractor hereby acknowledges that they understand that any low-income and very low-income resident of the project area, for him/her or as representatives of persons similarly situated, seeking employment or job training opportunities in the project area, or any eligible business concerns seeking contract opportunities may file a grievance if efforts to the greatest extent feasible were not executed. The grievance must be filed with HUD not later than one hundred eighty (180) calendar days from the date of the action (or omission) upon which the grievance is based.

ATTESTATION:

I attest that the above information is true and correct and that by signing below, the Contractor hereby agrees to comply with Section 3 requirements.

Name of Prime Contractor: _____

Name of Authorized Officer: _____

Title of Authorized Officer: _____

Signature

Date

The purpose of this form is to comply with HUD Section 3 administration and certification regulations.

Printed Name of Individual: _____

My home address is (must be a street address and NOT a PO. Box number):

 Street Address Apt Number City State Zip

Phone #: _____ Email Address: _____

I certify that I am a legal resident of the United States and meet the income eligibility and federal guidelines for a Section 3 Resident below:

To qualify as a Section 3 Resident, you must meet one of the following standards (Initial One):

_____ Be a public housing resident or a Housing Choice Voucher program participant (Section 8 rent assistance voucher) managed by MHB; Or

_____ Be a low income or very low income person who resides in the Mobile Housing Board area and whose total household income does not exceed the following amounts:

My total annual household income is \$_____ and there are a total of ____ people living in my household. My household income must be at or less than the below amount for my household size.

Family Size	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
Household Income-2019	33,950	38,800	43,650	48,500	52,400	56,300	60,150	64,050

I hereby certify to the U.S. Department of Housing and Urban Development (HUD) that all of the information on this form is true and correct. I attest under penalty of perjury that my total household income and household size is as shown above, and that proof of this information may be requested in the future. If found to be inaccurate, I understand that I may be disqualified as an applicant and/or a certified Section 3 individual which may be grounds for termination of training, employment, or contracts that resulted from this certification. I also understand that failure to complete this form completely and accurately may result in other administrative remedies available to HUD. Finally, I authorize the Mobile Housing Board to include my name on a list of Section 3 Residents seeking employment and to include my contact information so that contractors may contact me.

Are you a military service veteran? ____Yes ____No

Signature

Date



151 South Claiborne Street, Mobile, AL 36602

SECTION 3 POLICY

INTERNAL DEPARTMENTAL PROCEDURES

FOR

MOBILE HOUSING BOARD

NOTE: These procedures are specific to the implementation of the MHB Section 3 regulation and this policy and are not fully operating procedures for all departmental activities associated with MHB day-to-day operations.

Procedures revised as of: December 12, 2019

Procedure Title: Section 3

This operating procedure is tied to the MHB Section 3 Policy only and designed to achieve and maintain compliance with the HUD Act of 1968 revised 1992, 1994 and any compliance agreements in place upon its development and approval.

The procedures contained within are relative to the Section 3 daily operations in:

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Section 1 - Internal Hiring

Because the Mobile County Personnel Board controls the initial review and ranking of all applicants for all County entities including Mobile Housing Board, the ability to control and ensure Section 3 Preference requirements are being met, are not possible until later in the interviewing process. The entire application, review, and ranking of applicants is governed under the laws, rules, and acts on the Personnel Board website <https://www.personnelboard.org/personnel-board/laws-rules/>. As these requirements are subject to change without notice, please use this link to familiarize yourself with the current process.

Once the highly ranked candidates are referred to MHB for interviews, the human resources department will provide each applicant with a copy of the Resident Self-Certification Form #4 found on page 24 of this policy package. Dependent upon the voluntary completion of the form, those electing the Section 3 Preference will be granted all consideration if they are among the best qualified candidates as referred to the CEO for final selection.

Section 2 - Procurement and Contracting

This policy on procurement procedures is relative only to Section 3 and is not designed to re-write the approved procurement policy for MHB. **The general steps below regarding Section 3 apply to all Section 3 covered procurements procured by any MHB staff, REGARDLESS of dollar amount.**

To encourage a greater pool of qualified Section 3 business concerns as well as Resident-Owned Businesses (ROBs) and to train all contractors on Section 3 provisions and requirements, MHB will implement outreach and training efforts targeting the business community and potential Section 3 business concerns. As described in the policy, MHB will also create or partner on a Section 3 business concern

registry that will be available for MHB and/or potential contractors to use to identify possible qualified Section 3 businesses.

STEP 1: MHB procurement staff will continue to solicit and compete procurements in accordance with its procurement policy, using the most appropriate given the size and type of procurement. Possible locations to use to promote procurements include:

1. The local community newspaper (even if in non-English language)
2. The most widely distributed newspaper
3. The Daily Reporter
4. MHB website
5. MHB property management offices in a conspicuous location
6. Emerging business enterprise (EBE) businesses such as MBEs, WBEs, etc.
7. Local HUD supported housing communities
8. Email blast to contractors on registry
9. If sufficient time, in flyers, newsletters, etc. to residents
10. Other locations as approved by MHB

STEP 2: All ads must include a notice that, ***"This contract opportunity is a Section 3 Covered Contract and any Section 3 Business Concerns are encouraged to apply."***

STEP 3: All solicitations for Section 3 covered procurements must include the MHB Section 3 policy and forms for contractors to complete and return with their bids/responses.

STEP 4: In reviewing the solicitation responses, any contractors that are identified as qualified Section 3 Business Concerns should be reviewed, and if responsive and responsible, granted a preference in contracting after all other factors are considered. If one or more Section 3 business concern is identified as a qualified contractor, all things being equal, preference for contracting should be given to Section 3 business concerns based on the priority preference order described in the MHB Section 3 Policy, in Section V (Section 3 Goals and Preferences).

STEP 5: Where deemed by MHB Procurement staff as effective and efficient, Indefinite Delivery Indefinite Quantity (IDIQ) contracts will be used, especially when many of the services procured are in small but constant quantities by the housing property staff. In such IDIQ procurements, Section 3 policies and preferences will fully apply.

STEP 6: In any Section 3 covered purchase order or contract, the full Section 3 clause is to be incorporated into the purchase order or contract.

STEP 7: In addition to the Section 3 clause, following language is to be added to all new contracts effective immediately:

“In addition to the regulations regarding Section 3 in 24 CFR Part 135, the parties to this contract agree to comply with the requirements of MHB’s Section 3 Policy, which is attached to this contract.”

STEP 8: Except in emergency procurements where time is of the essence, no contract will be entered into or be given permission to proceed unless and until the Section 3 plan provided by the contractor is deemed in accordance with Section 3 regulations and MHB Section 3 Policy.

STEP 9: The Section 3 Coordinator and MHB staff providing contract oversight will work together to:

- Continually communicate with the contractor the importance of hiring MHB residents and other Section 3 residents or providing training whenever possible.
- Monitor contractor-issued payrolls for any new hires not in compliance with Section 3 requirements and MHB’s Section 3 policy.
- Monitor every contractor-submitted pay request for any subcontractors not in compliance with Section 3 requirements and MHB’s Section 3 policy.
- Deviation from the contractor’s approved Section 3 plan that results in noncompliance with Section 3 may result in termination of a contract.

STEP 10: This step is only applicable when a public housing authority is involved in the transaction. After MHB has successfully executed the requirements of this new policy for 24 - 36 months, leveraging this step should be considered.

During the development of any solicitation or work project that is a Section 3 covered procurement, there should be a determination by MHB as to whether or not the work can be and/or should be limited to Resident Owned Businesses (ROB’s) under the **24CFR Part 963.12 Alternative Procurement Method**. If so, then STEPs 2-8 should be followed with respect for **ROB’s ONLY**. In the definition of ROB, “Owned and controlled” means a business (a) at least 51% owned and operated by a public housing resident; and (b) whose management and daily business operations are controlled by one or more such individuals. Whenever ROB status is sought, MHB staff shall verify such status by requesting address and ownership verification of the 51% Owner/Operator rule as stated in the HUD Act of 1968. Use of the **Section 3 Form #2-“Section 3 Business Concern Self-Certification Form”** is an acceptable statement of address and business data, when presented along with all other required incorporation documents including any letter of issuance of a Federal Employer Identification Number (FEIN) and state Articles of Incorporation.

MHB
SEMAP Certification
FY 2019

Performance Indicator	Maximum Points	Prior FY Score	Current FY 2018 Score	Projected FY 2019 Score	Comments / Source
1. Selection from the Waiting List 98% = 15 points // <98% = 0 points	15	15	15	15	PHA Records Review - Used Income Targeting
2. Reasonable Rent ≥98% = 20 points 80% < 98% = 15 points	20	20	20	15	PHA Records Review
3. Determination of Adjusted Income ≥90% = 20 points 80% < 90% = 15 points	20	0	0	0	File Reviews - Corrective Action Plan Needed
4. Utility Allowance	5	5	5	5	PHA Records Review
5. HQS Quality Control Inspections	5	5	5	5	PHA Records Review
6. HQS Enforcement	10	10	10	10	PHA Records Review
7. Expanding Housing	5	5	5	5	PHA Records Review
8. Payment Standards	5	5	5	5	Review of Schedules
9. Annual Reexaminations - Fewer than 5% are over 2 months overdue = 10 points - 5% - 10% are over 2 months overdue = 5 points - 10% over 2 months overdue = 0 points	10	10	0	10	IMS/PIC data - SEMAP module
10. Correct Tenant Rent Calculations - 2% or fewer of the PHA rents and family share of the rents are calculated incorrectly = 5 points - More than 2% are calculated incorrectly = 0 points	5	5	0	5	IMS/PIC data - SEMAP module
11. Pre-Contract HQS Inspections - 98% to 100% of the units passed before the contract effective date = 5 points - Fewer than 98% passed before the contract effective date = 0 points	5	5		5	IMS/PIC data - SEMAP module
12. Continuing HQS Inspections - Fewer than 5% of annual inspections of units under contract are more than 2 months overdue = 10 points - 5% to 10% of all annual HQS inspections of units under contract are more than 2 months overdue = 5 points - More than 10% of all annual inspections of units under contract are more than 2 months overdue = 0 points	10	10		10	IMS/PIC data - SEMAP module
13. Lease-up - The percent of units budgeted during the PHA fiscal year was 98% or more = 20 points - The percent of units budgeted during the PHA fiscal year was 95% to 97% = 15 points - The percent of units budgeted during the PHA fiscal year was less than 95% = 0 points	20	20	20	20	VMS
14. FSS Enrollment and Escrow Account Balance - 80% or more of its mandatory slots and 30% of the FSS families have escrow balances = 10 points	10	10	10	10	IMS/PIC data - SEMAP module
Deconcentration Bonus	5	0	0	0	PHA Data
Total	150	125	95	120	<i>FY 2019 Projecting Standard Performer</i>
SEMAP Performer Status Calculation	145	86%	66%	83%	

High performer: 90% Standard Performer: 89-61% Troubled: 60% and below

*The scores shown in **RED** are areas that need special attention.

*The scores shown in **BLUE** are subject to change as the fiscal year continues and/or more data is collected.

*The scores shown in **Black** are actual anticipated scores.

Mobile Housing Board

Schedule of Flat and Minimum Rents

Minimum Rent = \$50.00

Development	0BR	1BR	2BR	3BR	4BR	5BR
Oaklawn		\$525	\$630	\$827		
Orange Grove		\$525	\$630	\$827		
Thomas James		\$525	\$630	\$827		\$1071
Gulf Village		\$525	\$630	\$827		
RV Taylor		\$525	\$630	\$827	\$931	\$1071
Central Plaza Towers	\$519	\$525	\$630			
Emerson Gardens		\$519	\$616			
Boykin Tower		\$525	\$630			
Downtown Renaissance		\$561	\$673			
Max Rent – 60%		\$682	\$826			
Renaissance Gardens			\$630	\$827		
The Renaissance		\$682	\$819	\$945		
Max Rent						