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

Small PHA Plan Update Annual Plan for Fiscal Year: 2002

NOTE: THIS PHA PLANS TEMPLATE (HUD 50075) IS TO BE COMPLETED IN ACCORDANCE WITH INSTRUCTIONS LOCATED IN APPLICABLE PIH NOTICES

HUD 50075 OMB Approval No: 2577-0226

Expires: 03/31/2002

PHA Plan Agency Identification

PHA N	Name: Housing Authority of the City of Fulton Missouri
PHA N	Jumber: MO014
PHA F	iscal Year Beginning: 04/2002
Name: M Phone: 5' TDD:	Plan Contact Information: Jatthew J. Kuhl 73 642-7611 Kuhl@hafmo.org
Informa all that a	Access to Information tion regarding any activities outlined in this plan can be obtained by contacting: (selection (selection)) Main administrative office of the PHA PHA development management offices
Display	y Locations For PHA Plans and Supporting Documents
X M P M P P P P	A Plans (including attachments) are available for public inspection at: (select all that apply) Main administrative office of the PHA PHA development management offices Main administrative office of the local, county or State government Public library PHA website Other (list below)
X N	n Supporting Documents are available for inspection at: (select all that apply) Main business office of the PHA PHA development management offices Other (list below)
	Housing and Section 8 Section 8 Only Public Housing Only

Annual PHA Plan Fiscal Year 2002

[24 CFR Part 903.7]

i. Table of Contents

Provide a table of contents for the Plan, including attachments, and a list of supporting documents available for public inspection. For Attachments, indicate which attachments are provided by selecting all that apply. Provide the attachment's name (A, B, etc.) in the space to the left of the name of the attachment. If the attachment is provided as a **SEPARATE** file submission from the PHA Plans file, provide the file name in parentheses in the space to the right of the title.

	Contents	Page #
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X	Attachment F: Pet Policy		31
X X	Attachment G: Resident Survey Correction Action Plan Attachment H: Conversion Analysis Other (List below, providing each attachment name)	33	40
	Part 903.7 9 (r)]		
At PHA	option, provide a brief overview of the information in the Annual Plan		
None 2. C a	immary of Policy or Program Changes for the Upcoming Year apital Improvement Needs		
-	Part 903.7 9 (g)] ons: Section 8 only PHAs are not required to complete this component.		
Lacinpu	ons. Section 6 only 11145 are not required to complete this component.		
A. X Y	Yes No: Is the PHA eligible to participate in the CFP in the fiscal year covered by this PHA Plan?		
B. Wh	at is the amount of the PHA's estimated or actual (if known) Capital Fund Program grant for the upcoming year? \$ 350	,000	
	es No Does the PHA plan to participate in the Capital Fund Program in the upcoming year? If yes, complete next component.	the rest o	of Component 7. If no,
D. Cap	oital Fund Program Grant Submissions		

(1) Capital Fund Program 5-Year Action Pla
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The Capital Fund Program 5-Year Action Plan is provided as Attachment 1

(2) Capital Fund Program Annual Statement

The Capital Fund Program Annual Statement is provided as Attachment 2

3. Demolition and Disposition

[24 CFR Part 903.7 9 (h)]
Applicability: Section 8 only PHAs are not required to complete this section.

Does the PHA plan to conduct any demolition or disposition activities (pursuant to section 18 of the U.S. Housing Act of 1937 (42 U.S.C. 1437p)) in the plan Fiscal Year? (If "No", skip to next component; if "yes", complete one activity description for each

development.)

2. Activity Description

Demolition/Disposition Activity Description		
(Not including Activities Associated with HOPE VI or Conversion Activities)		
1a. Development name:		
1b. Development (project) number:		
2. Activity type: Demolition		
Disposition		
3. Application status (select one)		

Approved	
Submitted, pending approval	
Planned application	
4. Date application approved, submitted, or planned for submission: (DD/MM/YY)	
5. Number of units affected:	
6. Coverage of action (select one)	
Part of the development	
Total development	
7. Relocation resources (select all that apply)	
Section 8 for units	
Public housing for units	
Preference for admission to other public housing or section 8	
Other housing for units (describe below)	
8. Timeline for activity:	
a. Actual or projected start date of activity:	
b. Actual or projected start date of relocation activities:	
c. Projected end date of activity:	
4. Voucher Homeownership Program [24 CFR Part 903.7 9 (k)]	
A. Yes X No: Does the PHA plan to administer a Section 8 Homeownership program purimplemented by 24 CFR part 982? (If "No", skip to next component; if complete questions for each program identified.)	• •

B. Capacity of the PHA to Administer a Section 8 Homeownership Program

The PHA has demonstrated its capacity to administer the program by (select all that apply):

Establishing a minimum homeowner down payment requirement of at least 3 percent and requiring that at least 1 percent of the down payment comes from the family's resources Requiring that financing for purchase of a home under its section 8 homeownership will be provided, insured or guaranteed by the state or Federal government; comply with secondary mortgage market underwriting requirements; or comply with generally accepted private sector underwriting standards Demonstrating that it has or will acquire other relevant experience (list PHA experience, or any other organization to be involved and its experience below):
5. Safety and Crime Prevention: PHDEP Plan [24 CFR Part 903.7 (m)] Exemptions Section 8 Only PHAs may skip to the next component PHAs eligible for PHDEP funds must provide a PHDEP Plan meeting specified requirements prior to receipt of PHDEP funds.
A. Yes No: Is the PHA eligible to participate in the PHDEP in the fiscal year covered by this PHA Plan?
B. What is the amount of the PHA's estimated or actual (if known) PHDEP grant for the upcoming year? \$_42,000
C. Yes No Does the PHA plan to participate in the PHDEP in the upcoming year? If yes, answer question D. If no, skip to next component.
D. Yes No: The PHDEP Plan is attached at Attachment
6. Other Information [24 CFR Part 903.7 9 (r)]

Small PHA Plan Update Page 6 **Table Library**

A. Resident Advisory Board (RAB) Recommendations and PHA Response

1. Yes X N	o: Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?
2. If yes, the o	comments are Attached at Attachment
3. In what ma	Inner did the PHA address those comments? (Select all that apply) The PHA changed portions of the PHA Plan in response to comments A list of these changes is included Yes No: below or Yes No: at the end of the RAB Comments in Attachment
	Other: (list below)
	t of Consistency with the Consolidated Plan ble Consolidated Plan, make the following statement (copy questions as many times as necessary).
•	ed Plan jurisdiction: State of Missouri
2. The PHA h	as taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)
X	The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s. The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan. The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan. Activities to be undertaken by the PHA in the coming year are consistent with specific initiatives contained in the Consolidated Plan. (list such initiatives below)
	Other: (list below)

3.	PHA Rec	uests for	support	from t	the Conso	olidated	Plan A	Agency

Yes X No: Does the PHA request financial or other support from the State or local government agency in order to meet the needs of its public housing residents or inventory? If yes, please list the 5 most important requests below:

4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

C. Criteria for Substantial Deviation and Significant Amendments

1. Amendment and Deviation Definitions

24 CFR Part 903.7(r)

PHAs are required to define and adopt their own standards of substantial deviation from the 5-year Plan and Significant Amendment to the Annual Plan. The definition of significant amendment is important because it defines when the PHA will subject a change to the policies or activities described in the Annual Plan to full public hearing and HUD review before implementation.

A. Substantial Deviation from the 5-year Plan:

Substantial deviation from the five year plan will be defined as a significant change in the mission or operation of the Housing Authority.

A. Significant Amendment or Modification to the Annual Plan:

Significant amendment or modification to the annual plan will be defined as changes that substantially alter the operations of the housing authority including major changes in policies, changes in modernization projects, drug elimination grants, or other sources of funding.

<u>Attachment_A_</u> Supporting Documents Available for Review

PHAs are to indicate which documents are available for public review by placing a mark in the "Applicable & On Display" column in the appropriate rows. All listed documents must be on display if applicable to the program activities conducted by the PHA.

List of Supporting Documents Available for Review					
Applicable & On Display	Supporting Document	Related Plan Component			
XX	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations State/Local Government Certification of Consistency with the Consolidated Plan (not required for this update)	5 Year and Annual Plans 5 Year and Annual Plans			
XX	Fair Housing Documentation Supporting Fair Housing Certifications: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions' initiatives to affirmatively further fair housing that require the PHA's involvement.	5 Year and Annual Plans			
XX	Housing Needs Statement of the Consolidated Plan for the jurisdiction/s in which the PHA is located and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan: Housing Needs			
XX	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources			

List of Supporting Documents Available for Review					
Applicable & On Display	Supporting Document	Related Plan Component			
XX	Public Housing Admissions and (Continued) Occupancy Policy (A&O/ACOP), which includes the Tenant Selection and Assignment Plan [TSAP]	Annual Plan: Eligibility, Selection, and Admissions Policies			
XX	Any policy governing occupancy of Police Officers in Public Housing check here if included in the public housing A&O Policy	Annual Plan: Eligibility, Selection, and Admissions Policies			
XX	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies			
XX	Public housing rent determination policies, including the method for setting public housing flat rents check here if included in the public housing A & O Policy	Annual Plan: Rent Determination			
XX	Schedule of flat rents offered at each public housing development check here if included in the public housing A & O Policy	Annual Plan: Rent Determination			
XX	Section 8 rent determination (payment standard) policies X check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination			
XX	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation)	Annual Plan: Operations and Maintenance			
XX	Results of latest binding Public Housing Assessment System (PHAS) Assessment	Annual Plan: Management and Operations			
XX	Follow-up Plan to Results of the PHAS Resident Satisfaction Survey (if necessary)	Annual Plan: Operations and Maintenance and Community Service & Self-Sufficiency			

	List of Supporting Documents Available for Review							
Applicable & On Display	Supporting Document	Related Plan Component						
XX	Results of latest Section 8 Management Assessment System (SEMAP)	Annual Plan: Management and Operations						
	Any required policies governing any Section 8 special housing types check here if included in Section 8 Administrative Plan	Annual Plan: Operations and Maintenance						
XX	Public housing grievance procedures check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures						
XX	Section 8 informal review and hearing procedures X check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures						
XX	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for any active grant year	Annual Plan: Capital Needs						
XX	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grants	Annual Plan: Capital Needs						
	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans, or any other approved proposal for development of public housing	Annual Plan: Capital Needs						
	Self-evaluation, Needs Assessment and Transition Plan required by regulations implementing § 504 of the Rehabilitation Act and the Americans with Disabilities Act. See, PIH 99-52 (HA).	Annual Plan: Capital Needs						
	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition						
	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing						

	List of Supporting Documents Available for Review							
Applicable & On Display	Supporting Document	Related Plan Component						
	Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act, Section 22 of the US Housing Act of 1937, or Section 33 of the US Housing Act of 1937	Annual Plan: Conversion of Public Housing						
	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership						
	Policies governing any Section 8 Homeownership program (sectionof the Section 8 Administrative Plan)	Annual Plan: Homeownership						
XX	Cooperation agreement between the PHA and the TANF agency and between the PHA and local employment and training service agencies	Annual Plan: Community Service & Self-Sufficiency						
	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency						
XX	Section 3 documentation required by 24 CFR Part 135, Subpart E	Annual Plan: Community Service & Self-Sufficiency						
	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	Annual Plan: Community Service & Self-Sufficiency						
XX	The most recent Public Housing Drug Elimination Program (PHEDEP) semi-annual performance report	Annual Plan: Safety and Crime Prevention						

	List of Supporting Documents Available for Review							
Applicable & On Display	Supporting Document	Related Plan Component						
XX	PHDEP-related documentation: Baseline law enforcement services for public housing developments assisted under the PHDEP plan; Consortium agreement/s between the PHAs participating in the consortium and a copy of the payment agreement between the consortium and HUD (applicable only to PHAs participating in a consortium as specified under 24 CFR 761.15); Partnership agreements (indicating specific leveraged support) with agencies/organizations providing funding, services or other in-kind resources for PHDEP-funded activities; Coordination with other law enforcement efforts; Written agreement(s) with local law enforcement agencies (receiving any PHDEP funds); and All crime statistics and other relevant data (including Part I and specified Part II crimes) that establish need for the public housing sites assisted under the PHDEP Plan.	Annual Plan: Safety and Crime Prevention						
XX	Policy on Ownership of Pets in Public Housing Family Developments (as required by regulation at 24 CFR Part 960, Subpart G) check here if included in the public housing A & O Policy	Pet Policy-Attached						
XX								
	Troubled PHAs: MOA/Recovery Plan Other supporting documents (optional) (list individually; use as many lines as necessary)	Troubled PHAs (specify as needed)						

Attachment B

Ann	ual Statement/Performance and Evalu	ation Report			
Сар	ital Fund Program and Capital Fund l	Program Replace	ment Housing Fact	tor (CFP/CFPRHF)	Part 1: Summary
PHA	Name: Housing Authority of the City of Fulton Missouri	Grant Type and Number			Federal FY of Grant:
		Capital Fund Program:]	MO36PO14501-00		2000
		Capital Fund Program			
			sing Factor Grant No:		
Or	iginal Annual Statement	Reserve for Disa	sters/ Emergencies Revi	sed Annual Statement (revision	on no:)
X Per	formance and Evaluation Report for Period Ending: 03/31	/2002 Final Performa	ance and Evaluation Report	•	,
Line	Summary by Development Account	Total E	Estimated Cost	Total	Actual Cost
No.					
		Original	Revised	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations	3,980	3,980	3,980	3,980
3	1408 Management Improvements	5,,000	5,000	5,000	5000
4	1410 Administration	25,000	25,000	25,000	25000
5	1411 Audit				
6	1415 liquidated Damages				
7	1430 Fees and Costs	30,000	0		
8	1440 Site Acquisition				
9	1450 Site Improvement	100,000	0		
10	1460 Dwelling Structures	100,000	0		
11	1465.1 Dwelling Equipment—Nonexp endable	20,000	10,000	10,000	10000
12	1470 Non-dwelling Structures	15,000	304,406	304,406	304406.00
13	1475 Non-dwelling Equipment	30,000	0		
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs				
18	1498 Mod Used for Development				

Ann	Annual Statement/Performance and Evaluation Report							
Capi	Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary							
PHA N	lame: Housing Authority of the City of Fulton Missouri	Grant Type and Number			Federal FY of Grant:			
		Capital Fund Program: ${f M}$	O36PO14501-00		2000			
		Capital Fund Program						
		Replacement Housing	g Factor Grant No:					
Ori	ginal Annual Statement	Reserve for Disaste	ers/ Emergencies Revised	Annual Statement (revision n	o:)			
X Perf	ormance and Evaluation Report for Period Ending: 03/31/	2002 Final Performand	ce and Evaluation Report					
Line	Summary by Development Account	Total Esti	mated Cost	Total Ac	tual Cost			
No.			<u>, </u>					
19	1502 Contingency							
20	Amount of Annual Grant: (sum of lines 2-19)	328,980.00	348,386	348,386.00	348,386.00			
21	Amount of line 20 Related to LBP Activities							
22	22 Amount of line 20 Related to Section 504 Compliance							
23	Amount of line 20 Related to Security							
24	Amount of line 20 Related to Energy Conservation							
	Measures							

Annual Statement/Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) **Part II: Supporting Pages**

Housing Authority of the City of Fulton **Grant Type and Number** Federal FY of Grant: 2000 PHA Name: Capital Fund Program #: MO36P014501-00 Missouri Capital Fund Program Replacement Housing Factor #:

Development Number	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Esti	mated Cost	Total Ac	Status of Proposed	
Name/HA-Wide Activities				Original	Revised	Funds Obligated	Funds Expended	Work
Ha Wide	Upgrade software	1408	Upgrade op System and security on 13 computers	5,000	5,000	5,000	5,000	Completed
Ha Wide	Advertising, Executive Director Salary	1410	18 Months	25,000	25,000	25,000	25,000	Completed
Ha Wide	Design, Construction Admin. Program Management	1430	12 Months	30,000	0	0	0	Removed
Ha Wide	Gutter replacement/repair Siding replacement/repair, Exterior Plumbing fixtures, roof replacement	1460	2000ft Gutter 50sq siding 25 outdoor plumbing fixtures (Hose Bibs) Roof 9 buildings	100,000	0	0	0	Moved forward to next CFP
Ha Wide	Landscaping, Security lighting	1450	50 buildings	100,000	0	0	0	Moved forward to next CFP
Ha Wide	Range/Refrigerator Replacement	1465.1	50	20,000	20,000	20,000	20,000	Completed

Annual Statement/Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) **Part II: Supporting Pages** Housing Authority of the City of Fulton **Grant Type and Number** Federal FY of Grant: 2000 PHA Name: Capital Fund Program #: MO36P014501-00 Missouri Capital Fund Program Replacement Housing Factor #: General Description of Major Work Development Dev. Acct No. Quantity **Total Estimated Cost** Total Actual Cost Status of Number Proposed Categories Original Name/HA-Wide Work Revised Funds Funds Obligated Expended Activities Ha Wide Community Center Flooring & Painting 1470 Additional 15,000 304,406 304,406 304,406 Completed New HVAC for one are of building roof Maintenance shop repairs replacement HVAC Ha Wide 1475 0 0 Replace Two Trucks, Service Bodies 2 trucks 30,000 0 Moved Forward to nest CFP

Annual Statement/Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part III: Implementation Schedule PHA Name: Fulton Housing Authority Grant Type and Number Federal EV of Cross 2006

PHA Name: Fulton Housing Authority			Type and Nu	mber			Federal FY of Grant: 2000
		Capi	tal Fund Progr	ram #: MO36P0	14501-00		
		Capi	tal Fund Progi	ram Replacement	Housing Factor #:		
Development Number	All F	and Obligat	igated All Funds Expended			Reasons for Revised Target Dates	
Name/HA-Wide	(Quar	Ending Da	ite)	(Q	uarter Ending Date	e)	
Activities							
	Original	Revised	Actual	Original	Revised	Actual	
Ha Wide	3/2002		3/2002	12/2002		3/2002	

Ann	ual Statement/Performance and Evalu	ation Report			
Cap	ital Fund Program and Capital Fund	Program Replace	ment Housing Fac	tor (CFP/CFPRHF)	Part 1: Summary
PHA N	Name: Housing Authority of The City of Fulton Missouri	Grant Type and Number	•		Federal FY of Grant:
		Capital Fund Program:	MO36PO14501-01		2001
		Capital Fund Program			
			sing Factor Grant No:		
Ori	ginal Annual Statement			ised Annual Statement (revisi	on no:)
	formance and Evaluation Report for Period Ending: 3/31/	02 Final Performanc	e and Evaluation Report	`	,
Line	Summary by Development Account	Total F	Estimated Cost	Tota	l Actual Cost
No.					
		Original	Revised	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations	50,000	50,000	50,000	50,000
3	1408 Management Improvements	5,000	15,000	14,456.93	14,456.93
4	1410 Administration	25,000	0	0	0
5	1411 Audit				
6	1415 liquidated Damages				
7	1430 Fees and Costs	25,000	15,000	15,000	13,417.75
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	200,000	166,328	160,000	73,513.65
11	1465.1 Dwelling Equipment—Nonexpendable	25,000	25,000	21,457	21,547
12	1470 Non-dwelling Structures	0	64,000	64,000	62,961
13	1475 Non-dwelling Equipment	25,000	20,000	20000	9500
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs				
18	1498 Mod Used for Development				
19	1502 Contingency				
20	Amount of Annual Grant: (sum of lines 2-19)	350,000	355,328	344,913.93	245,396.33
21	Amount of line 20 Related to LBP Activities				
22.	Amount of line 20 Related to Section 504 Compliance				

Ann	Annual Statement/Performance and Evaluation Report								
Capi	Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary								
PHA N	ame: Housing Authority of The City of Fulton Missouri	Grant Type and Number			Federal FY of Grant:				
		Capital Fund Program: MC	O36PO14501-01		2001				
		Capital Fund Program							
		Replacement Housing	Factor Grant No:						
	ginal Annual Statement		rs/ Emergencies Revised A	Annual Statement (revision n	o:)				
⊠Per:	formance and Evaluation Report for Period Ending: 3/31/0	02 Final Performance at	nd Evaluation Report						
Line	Summary by Development Account	Total Estin	mated Cost	Total Ac	tual Cost				
No.									
23	23 Amount of line 20 Related to Security								
24	24 Amount of line 20 Related to Energy Conservation								
	Measures								

Annual Statement/Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part II: Supporting Pages

PHA Name: Housing Authority of The City of Fulton		Grant Type and N	umber		Federal FY of Grant:			
Missouri		Capital Fund Pro	gram #: MO36P gram t Housing Factor		2001			
Development Number	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Esti	mated Cost	Total Ac	etual Cost	Status of Proposed
Name/HA-Wide Activities				Original	Revised	Funds Obligated	Funds Expended	Work
HA WIDE	Operations	1406		50,000		50,000	50,000	Complete
HA WIDE	Computers/Software/PhotoCopy machine	1408	4 computers	5,000	15,000	5,000	14456.93	Complete
HA WIDE	Architectural/Engineering/Consulting	1430	18 Months	20,000	15,000	15,000	13,417.75	Near Completion
HA WIDE	Deputy Director	1410	12 Months	25,000	0	0		Funded from other source
HA WIDE	Roof Repair/Replacement	1460	12 buildings	50,000	166,328	160,000	73,513.65	under construction
	Flooring		40 apartments	50,000	0			Moved forward
	Ceiling Repair		25 units	50,000	0			Repaired under operating fund
	Bathroom Renovation		25 units	50,000	0			Moved forward

Annual States	Annual Statement/Performance and Evaluation Report								
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)									
Part II: Supp	Part II: Supporting Pages								
PHA Name: Housin	g Authority of The City of Fulton	Grant Type and Nu	mber			Federal FY of	Grant:		
Missouri	, ,	Capital Fund Prog	ram #: MO36I	PO14501-01			2001		
		Capital Fund Prog	ram						
		Replacement	Housing Factor	#:					
Development	General Description of Major Work	Dev. Acct No.	Quantity	Total Esti	mated Cost	Total Actual Cost		Status of	
Number	Categories					Prop		Proposed	
Name/HA-Wide				Original	Revised	Funds	Funds	Work	
Activities						Obligated	Expended		
HA WIDE	HVAC Repair	1465.1	20 units	20,000	0				
	Water Heaters & Installation		50 units	17,200	5000	5000	5000		
	Refrigerators		20 units	7500	15000	15000	11,457		
	Ranges		20 units	5300	5000	5000	5000		

Annual Statement/Performance and Evaluation Report									
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)									
Part III: Impleme	entation S	chedu	ıle						
PHA Name: Housing Auth	ority of the Cit	y of	Grant 7	Type and Nur	mber			Federal FY of Grant: 2001	
Fulton Missouri			Capita	al Fund Progr	am #: MO36PC	14501-01			
			Capita	al Fund Progr	am Replacement	Housing Factor #:	:		
Development Number	All	Fund O	Obligate	d	A	Il Funds Expended	d	Reasons for Revised Target Dates	
Name/HA-Wide	(Qu	art Endi	ing Date	e)	(Q	Quarter Ending Date	e)		
Activities									
	Original	Revi	ised	Actual	Original Revised Actual			Meet HUD Requirements	
HA WIDE	12/31/02				06/30/04				

Annual Statement/Performance and Evaluation Report							
Capital Fund Pro	gram and	Capital	Fund Pro	gram Repla	cement Hou	sing Facto	or (CFP/CFPRHF)
Part III: Impleme	entation S	chedule					
PHA Name: Housing Auth	ority of the Cit	y of Gran	nt Type and Nu	mber			Federal FY of Grant: 2001
Fulton Missouri		Cap	oital Fund Progr	ram #: MO36PC	014501-01		
		•			Housing Factor #:		
Development Number Name/HA-Wide Activities		l Fund Oblig art Ending D			all Funds Expended Quarter Ending Date		Reasons for Revised Target Dates
	Original	Revised	Actual	Original	Revised	Actual	Meet HUD Requirements

Ann	ual Statement/Performance and Evalu	ation Report				
Cap	ital Fund Program and Capital Fund 1	Program Replacem	ent Housing Factor	(CFP/CFPRHF) Pa	art 1: Summary	
PHA N	Name: Housing Authority of the City of Fulton Missouri	Grant Type and Number			Federal FY of Grant:	
		Capital Fund Program: MC	O36P014501-02		2002	
		Capital Fund Program				
		Replacement Housing	g Factor Grant No:			
X Orig	ginal Annual Statement	Reserve for Disaster	rs/ Emergencies Revised A	Annual Statement (revision no	:)	
Per	formance and Evaluation Report for Period Ending:	Final Performance and Ev	valuation Report			
Line	Summary by Development Account	Total Estin	mated Cost	Total Ac	etual Cost	
No.						
		Original	Revised	Obligated	Expended	
1	Total non-CFP Funds					
2	1406 Operations	50,000				
3	1408 Management Improvements	5,000				
4	1410 Administration	30,000				
5	1411 Audit					
6	1415 liquidated Damages					
7	1430 Fees and Costs	10,000				
8	1440 Site Acquisition					
9	1450 Site Improvement	75,000				
10	1460 Dwelling Structures	140,000				
11	1465.1 Dwelling Equipment—Nonexpendable					
12	1470 Non-dwelling Structures					
13	1475 Non-dwelling Equipment	40,000				
14	1485 Demolition					
15	1490 Replacement Reserve					
16	1492 Moving to Work Demonstration					
17	1495.1 Relocation Costs					
18	1498 Mod Used for Development					
19	1502 Contingency					
20	Amount of Annual Grant: (sum of lines 2-19)	350,000				
21	Amount of line 20 Related to LBP Activities					

Ann	Annual Statement/Performance and Evaluation Report						
Capi	Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary						
PHA N	ame: Housing Authority of the City of Fulton Missouri	Grant Type and Number			Federal FY of Grant:		
		Capital Fund Program: MC	036P014501-02		2002		
		Capital Fund Program					
		Replacement Housing	Factor Grant No:				
X Orig	inal Annual Statement			Annual Statement (revision no	:)		
Per	formance and Evaluation Report for Period Ending:	Final Performance and Ev	aluation Report				
Line	Summary by Development Account	Total Estimated Cost		Total Ac	Total Actual Cost		
No.							
22	Amount of line 20 Related to Section 504 Compliance						
23	Amount of line 20 Related to Security	25,000					
24	Amount of line 20 Related to Energy Conservation						
	Measures						

Annual Statement/Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part II: Supporting Pages

PHA Name: Fulton MO **Grant Type and Number** Federal FY of Grant: 2002 Capital Fund Program #: MO36P014501-02 Capital Fund Program Replacement Housing Factor #: Development General Description of Major Work Dev. Acct No. Quantity **Total Estimated Cost** Total Actual Cost Status of Number Categories Proposed Name/HA-Wide Original Revised Funds Funds Work Activities Obligated Expended HA WIDE Operations 1406 50,000 HA WIDE Computer upgrades 1408 New server 5,000 and related equipment HA WIDE 30,000 Administration 1410 ED and deputy salary Landscape 10,000 HA WIDE A&E Fees 1430 planning and construction documents

Annual Statement/Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part II: Supporting Pages

PHA Name: Fulton N	MO	Grant Type and N Capital Fund Pro		Federal FY of	Federal FY of Grant: 2002			
		Capital Fund Pro						
			t Housing Factor	#•				
Development Number	General Description of Major Work Categories	Dev. Acct No.	Quantity		nated Cost	Total Ac	Total Actual Cost	
Name/HA-Wide Activities	•			Original	Revised	Funds Obligated	Funds Expended	Proposed Work
HA WIDE	Site Improvement	1450	Replace 1000'	25,000				
			Sidewalk landscaping	25,000				
			Exterior Video Security	25,000				
HA WIDE	Dwelling Structures	1460	Re Roof 40 buildings	150,000				
HA WIDE	Non Dwelling Structures	1470	Bucket truck and skid- steer loader	30,000				

Annual Statemen	t/Perform	ance and	Evaluatio	on Report			
Capital Fund Pro	gram and	Capital I	Fund Pro	gram Repla	cement Hou	sing Facto	or (CFP/CFPRHF)
Part III: Impleme	entation S	chedule					
PHA Name: Fulton MO		Grant	Type and Nu	mber			Federal FY of Grant: 2002
		_	-	ram #: MO36P0			
		Capit	tal Fund Prog		Housing Factor #:		
Development Number Name/HA-Wide Activities		l Fund Obligat uart Ending Da			All Funds Expended Quarter Ending Date		Reasons for Revised Target Dates
	Original	Revised	Actual	Original	Revised	Actual	
HA- Wide	12/31/03			06/30/05			

Attachment C

Capital Fund Program 5-Year Action Plan

Complete one table for each development in which work is planned in the next 5 PHA fiscal years. Complete a table for any PHA-wide physical or management improvements planned in the next 5 PHA fiscal year. Copy this table as many times as necessary. Note: PHAs need not include information from Year One of the 5-Year cycle, because this information is included in the Capital Fund Program Annual Statement.

	CFP 5-Year Action Plan			
Original statement	t X Revised statement			
Development				
Number	/			
MO014 001,2,3	PHA WIDE			
Description of Need	ed Physical Improvements or Management Improvements	Estimated Cost	Planned Sta (HA Fiscal	
Management Impro	vements: Hardware Software	30,000	4/2004	
Site Improvement:				
Landscape 200 unit	s (25 per year)	100,000	4/2002	
Drainage,		50,000	4/2004	
Water Line Replace	ement, Waste Line Replacement, [3 sites]	600,000	4/2003	
Sidewalk, Step and	Ramp replacement 3000' 50 steps/ramps	50,000	4/2002	
Parking Lot Resurf	ace / seal asphalt and concrete [30,000 sf]	150,000	4/2003	
Dwelling Structure	s:			
Entry and storm doc	or replacement, [25 units]	40,000	4/2003	
bathroom rehabilita	ation [25 units]	100,000	4/2002	
Brick repair. [Syc	camore various buildings due to settling]	25,000	4/2004	
Foundation Stabiliz	ration (mud Jack) [6 buildings]	25,000	4/2002	
Kitchen Rehabilitat	ion [50 units]	200,000	4/2004	
Non-Dwelling Equip	oment: Large tools, power equipment	50,000	4/2003	
Dwelling Equipment				
HVAC replacement		20,000	4/2004	
Water heater replac		10,000	4/2003	
Range and refrigera	ntor replacement [30 units]	20,000	4/2003	
Total estimated cost	over next 5 years	1,340,000		

Required Attachment D: Resident Member on the PHA Governing Board

1.	Yes X No: Does the PHA governing board include at least one member who is directly assisted by the PHA this year? (if no, skip to #2)
A.	Name of resident member(s) on the governing board:
B.	How was the resident board member selected: (select one)? Elected Appointed
C.	The term of appointment is (include the date term expires):
2.	A. If the PHA governing board does not have at least one member who is directly assisted by the PHA, why not? the PHA is located in a State that requires the members of a governing board to be salaried and serve on a full time basis X the PHA has less than 300 public housing units, has provided reasonable notice to the resident advisory board of the opportunity to serve on the governing board, and has not been notified by any resident of their interest to participate in the Board. Other (explain):
B.	Date of next term expiration of a governing board member:
_	

- C. Name and title of appointing official(s) for governing board (indicate appointing official for the next position): Mayor Robert Craighead

Required Attachment E: Membership of the Resident Advisory Board or Boards

Rebecca Page, Linda Logan, Barbra Cheney, Joe Kemp, Tresa Jackson, Cheryl Allee, Shelia Eads, Thomas Kite, Sherry Gwinn, Amber Rorher:

Required Attachment F: Pet Policy

PET POLICY

The following rules are established to govern the keeping of pets in and on properties owned and operated by the Housing Authority of the City of Fulton, Missouri.

- 1. That no more than one dog or cat, as described hereafter, per household shall be permitted. That no exotic or farm animals will be allowed as pets, only common household pets will be allowed. Common household pet means a domesticated animal, such as a dog, cat, bird, rodent including a rabbit, fish or turtle, that is traditionally kept in homes for pleasure rather than commercial purposes. Common household pet does not include reptiles (except turtles). Exception: Persons with disabilities are entitled to have medically necessary assistive and companion animals and will not be charged a pet security deposit. The need for a medically necessary animal must be verified by a health provider agency &/or doctor as requested by FHA.
- 2. The following breeds, or mixed breeds, of dogs are specifically prohibited:
 Doberman Pinscher, Bulldog, Pitbull, Bull Terrier, Chow, German Shepherd, and Rottweiler. Any dog or cat bred to be aggressive in behavior is specifically prohibited. Any dog or cat that is greater than 18 inches tall is prohibited. Exception: FHA tenants with disabilities are allowed to have German Shepherds when said animals are being utilized as assistive animals. Medically necessary assistive and companion animals of any size and/or breed are allowed.
- 3. That any dog or cat housed within the Housing Authority shall be registered with the Housing Authority, wear a collar, and be in compliance with the Fulton City Ordinance governing animals and fowl. The owner's name shall be affixed to the collar on said dog or cat.
- 4. That said dog or cat shall be registered with the Housing Authority and the owner shall present current documentation of proper shot record and that the dog or cat be neutered with proof provided by the owner. The owner shall update the registration of the animal annually.
- 5. That said dog or cat shall be under the control of the owner at all times, either in the owner's yard, in the home, tied up or otherwise under the control of the owner in other areas outside the owner's yard area. Care is to be taken that the yard is not damaged by the animal confined in one location. Bodily wastes of the animal shall be cleaned up daily by the owner. The animal should be moved periodically to avoid destroying the ground cover. In the case of cats and other pets using litter boxes, the pet owner must change the litter at least twice a week, and pet owners must separate pet waste from litter at least once a day.
- a. A separate pet waste removal charge of twenty five dollars (\$25.00) per occurrence shall be charged to owners who fail to remove pet waste in accordance with these rules. (Occurrence means each time HA personnel perform the task of removing feces from the yard or adjacent area to the pet.)

- 6. That any dog or cat so registered with the Housing Authority which causes, in the judgment of the Housing Authority, a public nuisance in the neighborhood, shall be removed from Housing Authority property. A public nuisance is defined as excessive or continuous barking or yelping or noise, molesting passers-by, habitually chasing vehicles, habitually attacking other animals, trespassing on other public or private property in such a manner as to cause damage to said property. If an animal attacks a resident or employee of the Housing Authority the animal must be removed from all Housing Authority property. Excessive odor from animal waste is considered a nuisance. Pets must be kept free of ticks, fleas and other vermin.
- 7. That refusal of a tenant to remove a dog, cat or other household pet which has been determined to be a public nuisance, or is of a breed which is prohibited under this policy, or who fails to properly register a pet with the Housing Authority as required under this policy, shall be grounds for termination of said tenant's Dwelling Lease under Section 12 thereof.
- 8. That pets not owned by a tenant may not be kept temporarily on the premises, except for visiting pet programs sponsored by a humane society or other nonprofit organizations.

 Pets may not be unattended in a dwelling unit for more than twelve (12) hours at a time.
- 9. Any resident having a dog or cat on Housing Authority premises is required to pay a refundable pet deposit to cover potential damages in the amount of \$75.00, payable before the animal is brought onto Housing Authority property. The payment must be in one lump sum and cannot be divided. The Housing Authority shall refund any unused portion of a pet deposit to the tenant within 30 days of the move out date or when the tenant advises they no longer have a pet. Damages attributable to the keeping of the pet will be charged against the deposit(i.e. yard damages, floor stains, wall stains, odor problems, holes and scratches to walls and doors.)
- 10. These rules may be amended by the Housing Authority from time to time, following consultation with the tenants. The Housing Authority will give a 30-day written notice about any amendment. The notice will state the amendment and request written comments form the tenants. If requested by the tenants, a meeting will be held to discuss the amendment.
- 11. Tenants are encouraged to carry liability insurance to cover bodily harm to individuals or damages to buildings or other property caused by their pets.
- 12. Any litigation resulting from actions by pets shall be the sole responsibility of the pet owner. The pet owner agrees to indemnify and hold harmless the Housing Authority from any claims, causes of action, damages or expenses, including attorneys fees, resulting from the action or activities of his or her pet.

13. The pet owner hereby names	of
	, Fulton, Mo. as the person who shall be responsible for the pet during
anytime of emergency or absence	from the premises of the pet owner. The pet owner agrees that the
Housing Authority may release or	r hand over possession of the pet to the above-named individual at such
	efuses to take possession of the pets or cannot be contacted, then the pet Authority to the City Animal Shelter.
The undersigned tenant	states that he or she has read, understands and agrees to abide by the
above Pet Rules.	

Resident	
A ddragg	
	Resident

Required Attachment G: Resident Survey Corrective Action Plan

SAFETY:

Item:

How safe do you feel in your unit / Home (Also Building as all units have exterior entrances).

Score 72.7 / 72.6

Action:

The Housing Authority reviewed areas of possible concern regarding interior safety. All units have steel entry doors and steel security screens. The majority of units also have deadbolt locks. The few units that do not have dead bolt locks are scheduled to be replaced in the summer of 2002. The units do have working handset locks and interior chain locks. The one area we felt interior security was lacking, and had lead to some break-in's was the practice of tenants unlocking security screens and running cable to the second floor bedrooms. The Housing Authority immediately issued a notice to tenants that is practice would not be accepted and that the Housing authority would remove any cable run in this fashion and lock or repair the security screen at the tenants expense.

The Housing Authority also worked with the city to eliminate through traffic in one development experiencing problems with loitering, and other problems by non-tenants.

Item:

Do you think any of the following contribute to crime in your development? Resident Screening.

Score 75

Action:

The Housing Authority reviewed its screening policies, and determined that its policies were comparable with others in the state, and provide

adequate measures to prevent problem tenants from entering Public Housing.

Item:

Are you aware of any crime prevention programs available to residents?

Score 52.5

Action:

The Housing Authority employs one Community Policing Officer full time. A Police officer also lives in Public Housing.

The Community Police Officers attach an additional page to our monthly news letter to inform tenants of activities they are sponsoring. They also provide safety tips, and alert tenants of potential crime problems. In addition to the regular news letter if a problem arises through the month they provide fliers to affected tenants, and also try to contact those that could be affected.

The officer that lives in Public Housing plans regular events for the youth, and sponsors a dance class free of charge to all children in the community. The program has been underwritten by the city.

After receiving the feedback from the resident survey police officers made extra patrols, especially bike patrols in Public Housing Developments.

Neighborhood Appearance:

Item:

How satisfied are you with the upkeep of the following areas in your development: common areas

Score 67.6 percent

Action:

The Housing Authority has very few areas such as stairways, walkways or hallways. The one area where there are exterior stairwells have historically been an area in which trash collected. The Housing Authority has contracted with a sheltered workshop to clean trash and other debris from public areas in the developments. This cleaning has dramatically reduced the amount of trash that accumulates in public areas.

Item:

How satisfied are you with the upkeep of the following areas in your development: Exterior of buildings.

Score 73.8

Action:

This spring of 2001 the Housing Authority repaired guttering and siding on all of its sites. On King Street all roofs were replaced. Additional work was done grading and trimming trees and bushes. In the summer of 2001 the exterior of the community center including the roof was completely rehabbed. In the spring of 2002 all siding was removed and replaced from our largest site. All roofing and guttering, and downspouts on this site were also replaced. The Housing has budgeted in its 2002 operating budget a number of part time maintenance positions for the summer in an effort to further improve the appearance of Public Housing Neighborhoods. The Housing Authority has contracted with a local sheltered workshop to provide trash removal on a weekly basis. The contract will be continued for the coming year.

Item:

How satisfied are you with the upkeep of the following areas in your development: Parking Areas.

Score 61.9

Action:

In the spring of 2001 the Housing Authority purchased a pressure washer to assist in cleaning Parking areas. In conjunction with our cleaning, the sheltered workshop provides trash removal at least once a week. In the fall of 2001 the Housing Authority began sealing and re-striping parking lots. The Housing Authority will continue doing

this, and has budgeted the professional rehabilitation of those parking areas needing more than sealing.

Item:

How satisfied are you with the upkeep of the following areas in your development: Recreation Areas.

Score 57.1

Action:

The Housing Authority has cleaned and installed additional mulch on all of its playgrounds. The basketball courts on Sycamore had new goals and baskets installed. The equipment in the Housing Authority playgrounds is comparable or superior to that found in the local parks and schools.

Item:

How often if at all are any of the following a problem in your development: Broken Glass.

Score 63.1

Action:

The Housing Authority has seen few problems with glass since contracting with the sheltered workshop for cleaning services. It appears as though tenants are responsive to the improved appearance and are working harder to keep areas clean.

Item:

How often if at all are any of the following a problem n your development: Noise.

Score 66.1

Action:

In an effort to combat noise problems and reduce criminal activity caused by individuals not residing in Public Housing the Housing Authority successfully petitioned the city to allow the Housing Authority to block through traffic on one of its streets. The measure dramatically reduces police calls for service. The Housing Authority has received very few calls regarding traffic or noise since closing the street

Item:

How often if at all are any of the following a problem n your development: Rodents and Insects.

Score 71.9

Action:

The Housing Authority contracts for extermination services. The tenants that have problems with insects are usually those that do not prepare for the treatments or do not keep good sanitary conditions in their homes. The Housing Authority has been working with outside social service providers to assist tenants in preparing their apartment for treatment and in keeping their apartments clean to prevent insects.

Item:

How often if at all are any of the following a problem n your development: Trash and Litter.

Score 57.9

Action:

In the spring of 2001 the Housing Authority installed new dumpster surrounds in an effort to prevent trash from blowing out of the containers.

The Housing Authority has also contracted with the local sheltered workshop to remove litter from the developments. The service has made a remarkable improvement in the neighborhood appearance.

Com	miini	$\alpha \alpha t$	OB.
			4 5 6 6 7
	шиш		1/11.

Item:

Do you think management provides you information about: Maintenance and Repair.

Score 72.5

Action:

The Housing Authority notifies tenants of any maintenance and repair work that is known in advance. If/when the city notifies the Housing office that water shut-off or power disruption is imminent, tenants are notified in advance or as soon as possible.

Item:

Do you think management provides you information about: The rules of your lease.

Score 74.4

Action:

When new tenants are leased the entire lease is read to the tenant and the tenant is allowed a question/answer time to insure that the tenant fully understands the rules of the lease. In the spring of 2001 the Housing Authority held a mandatory lease signing for all of its tenants. The lease was read verbatim to the tenants with a question/answer period following the session. The Housing Authority posts a copy of the lease in its lobby and staff is available at any time to address tenant questions or concerns.

Item:

Do you think management provides you information about: Meetings and Events.

Score 71.2

Action:

The Housing Authority provides a monthly news letter to tenants, informing them of upcoming meetings and events. The Housing Authority also sends reminder notices closer to the time the meeting or event will be occurring. The Housing Authority posts a flier with information regarding upcoming meetings or events in the waiting room lobby.

Item:

Do you think management is: Responsive to your questions and concerns.

Score 67.3

Action:

The Housing Authority is available to address tenant questions and concerns at all times. The Housing Authority often responds to questions and concerns on a case by case bases to insure that tenants know that the Housing Authority feels that their individual question/concern is important. The Housing Authority also provides a wealth of referral services based on a specific need or concern that may be more adequately addressed by another agency. The Housing Authority hosts a monthly resident council meeting where tenants may voice questions and concerns.

Item:

Do you think that management is: Courteous and Professional with you.

Score 73.2

Action:

The Housing Authority strives to provide courteous and professional assistance. The Housing Authority continues to look for new opportunities for professional growth and successful ways to better our interaction with tenants.

Item: Do you think management is: Supportive of your resident/tenant organization.

Score 70.5

Action:

The Housing Authority hosts a monthly resident council meeting. A management staff person, a member of the board of commissioners and the Housing Community Police Officer attend these monthly meetings. Tenants are encouraged to participate in these monthly meetings to better allow the Housing Authority to address their questions and concerns. These meetings are also utilized to establish goals and plan resident events.

Required Attachment H: Conversion Analysis VOLUNTARY CONVERSION OF PUBLIC HOUSING DEVELOPMENTS REQUIRED INITIAL ASSESSMENT

HOUSING AUTHORITY OF FULTON, MISSOURI

As required by 24 CFR part 972-Conversion of Public Housing to Tenant-Based Assistance, we have:

- 1. Reviewed each development's Operation as public housing:
- 2. Considered the implications of converting the public housing to tenant-based assistance;
- 3. Concluded that the conversion of the development may be;

Appropriate because removal of the development would meet the necessary conditions For voluntary conversion; or

Inappropriate because removal of the development would not meet the necessary conditions for voluntary conversion.

NECESSARY CONDITIONS FOR VOLUNTARY CONVERSION:

Not to be more expensive than continuing to operate the Development (or proportion of It) as public housing;

Principally benefit the residents of the public housing Development to be converted and the community; and

Not adversely effect the availability of affordable housing in the community

Development	Development Name	Development	Exemption Reason	Conversion
Number		Exempted		Appropriate?
M0014-001	Housing Auth.	No		No
M0014-002	Housing Auth.	No		No
M0014-003	Housing Auth.	No		No

It is the conclusion of the Fulton Housing Authority of the City of Fulton, Missouri that it Would not be in the best interest of the community, the current tenants or the authority to convert from the current public housing to a Voucher Program.

CONVERSION OF PUBLIC HOUSING

Conversion of the Fulton Housing Authority, Fulton, Missouri, to Tenant Based Assistance would NOT be appropriate at this time due to not meeting the necessary conditions.

- 1. It would be more expensive than continuing to operate the development as public housing.
- 2. It would not principally benefit the residents of the Public Housing Development.
- 3. It would adversely affect the availability of affordable housing in the community.