

Attachment B: Comments & Responses

FY2013 MTW Plan Comments

1. Rescind the out of unit absence policy (RAB)
2. The MHRC Executive Committee met September 6 and voted to support the recommendation by RAB to rescind the previously adopted “Absence from Unit Initiative” which disallows rent adjustment during extended absences even when income is lost during this period. The MHRC continues to believe that this policy does not in any measurable way improve MPHA’s financial situation but causes undue financial hardship for public housing residents. If the MPHA is reluctant to rescind this policy we request that MPHA systematically request and report on information from residents about how this policy has affected their lives and that staff report on the expected effects of possible changes to the policy including:
 - A. Changing from 30 days to 60 days absence before the rent policy is implemented; and
 - B. Increasing to three years the pay-back period for hardship waivers.

***MPHA Response (Comments 1-2):** The Absence from Unit Initiative was implemented as an amendment to MPHA’s 2011 MTW Plan. MPHA provides detailed information on this and all MTW Initiatives in its ‘Annual MTW Report’ which is published on line at www.mphaonline.org and also available at its Administrative Offices. MPHA does not plan to discontinue or make changes to this initiative. Residents do have an option for a longer repayment agreement.*

3. Residents support the proposed MPHA-Hennepin County Transitional Housing Demonstration Initiative which will provide housing and services to extremely vulnerable persons (MHRC).

***MPHA Response:** Thank you.*

II. FY2013 Public Housing Low Rent Statement of Policies (ACOP)

1. MPHA is proposing only minimal changes to their SOP, none of which, to date; have generated objections or concerns by residents. (MHRC)

MPHA Response: Thank you.

2. Residents are in support of the proposed change to Part V, regarding offering transfers to current tenants in studio apartments to one bedroom apartments in the same building, at designated buildings. (MHRC)

MPHA Response: Thank you.

3. Residents request that the Sales and Service Charge of \$60 for after-hours lock-outs be reduced to \$30. MPHA does not incur a cost for this service because the contract guard company provides the service with no charge to MPHA. (MHRC)

MPHA Response: MPHA will reduce this to \$30

4. A resident commented that the residents on Social Security Disability and General Assistance who receive only \$203/month, and who already pay rent of \$75/month, should not have to pay the additional \$25/month air conditioner charge for three summer months. This person said that while he is grateful for his apartment, having to pay 50% of his small income in rent is a hardship and does not seem fair. (MHRC)

MPHA Response: HUD regulations require PHA's to charge a surcharge, equivalent to the cost of utilities, to the resident for the use of air conditioning.

5. MPHA's policy as outlined in the SOP is to "inactivate" applicants if no preference points are apparent, or a family applicant has been housed in an MHOP unit. MHOP developments do not use MPHA's preference point system; rather they contact "apparently eligible" applicants from MPHA's family waiting list in chronological order. By inactivating an applicant because they have no MPHA preference points, or live in an MHOP unit, MPHA is not only denying low income families the opportunity to be housed, but limits the pool of potentially viable candidates for MHOP developments scattered throughout the 7-county Metro area. Many applicants specifically apply to MPHA's list to be afforded an opportunity to be considered for units in mixed finance developments (AMPs 8 and 9). The current policy limits the pool of candidates for MHOP developments, and exacerbates the growing problem of families currently living in MHOP developments from having an opportunity to move to a suitable unit outside of their respective developments when they become over/under housed.

MPHA Response: *MHOP families come off of MPHA’s waiting list. The purpose of the preference points is to establish a priority among those families who need affordable housing. MPHA’s waiting list by preferences to do not stop MHOP developments from taking families in chronological order.*

MHOP families agree to be taken off of MPHA’s family waiting list if they are housed in a MHOP development. Should MPHA open up its waiting list, a MHOP family applying for MPHA housing should be subject to the same criteria as are applied to all families submitting and application for public housing.

Please see the response to the next question as it relates to your comments about MHOP families who are over and under housed.

6. There is no provision in MPHA’s Policies to permit MHOP developments to effectuate a “transfer” of their public housing families to another MHOP development, or MPHA owned property when a family in good standing no longer meets the occupancy standards for the unit they are in. The Hollman Consent Decree obligates MHOP developments to house families from MPHA’s waiting list and Transfer waiting list for the life of the ACC. Permitting the opening of the waiting list specifically for this purpose, or otherwise adding families to the transfer waiting list specifically for this purpose will not fully eliminate this problem; however, will help in alleviating the problem of over/under occupancy and has the potential to greatly reduce turnaround time for MHOP developments. The offering policy would remain the same.

MPHA Response: *MPHA recognizes that MHOP families are from MPHA’s waiting list and are housed under MPHA’s Annual Contributions Contract (ACC) with HUD. MPHA will revised its Statement of Policies to first permit MHOP families who are over or under housed an opportunity to have a priority transfer to other MHOP developments who have openings in their developments, provided that the over or under housed MHOP tenant can meet the criteria for the development to which that family is seeking to transfer. MPHA will also permit MHOP families who are over or under housed to be put on MPHA’s transfer list under the same criteria as MPHA housed families, with the understanding that the MHOP family will need to be screened under MPHA’s screening criteria for being housed.*

MHOP families who are no longer eligible for a two bedroom unit and have screened and are otherwise eligible for MPHA’s highrise program will be offered a MPHA highrise unit in accordance with MPHA’s transfer policy from its family developments for similarly overhoused families. If a family meeting these circumstances refuses a MPHA unit, the MHOP Developer may terminate the tenant’s lease.

7. The Grievance Committee Selection: MHRC should have more involvement in the panel rotation process.

MPHA Response: *MPHA periodically trains hearing officers. All residents are sent information regarding the training and should let their Property Manager know if they are interested in being a hearing officer. Once residents are trained, they are called regarding upcoming opportunities to be an officer on a rotating basis. Residents must keep MPHA informed of any changes to their phone number as that is how they will be contacted.*

III. Capital Fund

1. Residents would like to see the Honeywell Security Audit Report.

MPHA Response: *MPHA has provided a copy of the Honeywell Security Audit Report to the Security Advisory Committee, the Minneapolis Highrise Representative Council, MPHA Board of Commissioners, and published it on its website. Copies of the Honeywell Security Audit Report are also available for review at MPHA's administrative offices.*

2. The elevators at 800 – 5th (MPHA's oldest building) should be a high priority.

MPHA Response: *The elevators at 800- 5th are slated for comprehensive rehab in 2017. MPHA's elevator consultant continues to assess elevator conditions at all MPHA's buildings and each year we fine tune the elevator rehab schedule.*

3. The skyway proposal for HPSSC and Heritage Commons should have been included in the original plan – 314 Hennepin needs repairs on pipes and elevators prior to funding the skyway.

4. There seemed to be consensus among residents at MPHA's Advance meeting that Capital Plan B which includes funding for major plumbing and other repairs at 314 Hennepin should take precedence over Plan A which would allocate \$2.6 million for a "skyway link" between Heritage Commons and the Senior Center. Residents from 314 Hennepin said that addressing chronic and long-standing plumbing and other concerns at their highrise is a critical need for the nearly 300 residents there. Residents at MPHA's Advance meeting were shown pictures of corroded and blocked plumbing at 314 Hennepin and at other highrises which raised

concerns about the safety of the water in our buildings. We understand that replacement of old plumbing has been, and continues to be, a major focus of MPHA capital improvement efforts. (MHRC – There were 23 resident comments regarding this issue attached.)

MPHA Response (Capital Fund Comments 3-4): *MPHA has decided to move forward with Plan B which includes 314 Hennepin work. We are continuing to assess the link including options for funding but priority for use of capital funds will be for preserving the viability of our housing portfolio, which is consistent with MPHA's Strategic Plan.*

IV. Other Comments

1. There should be an expansion of the resident self-help program.

MPHA Response: *MPHA is currently in the process of considering funding requests and funding availability for 2013 and will consider the expansion of the resident self help program in conjunction with other funding needs.*

2. Create a Section 3 Job bank

MPHA Response: *MPHA's Strategic Plan calls for MPHA to "create a job bank that provides a list of Section 3 Eligible Residents, job interest categories, and contact information that can be provided to firms doing business with MPHA." MPHA is working on an implementation process for its Strategic Plan and creating a job bank will be part of that process.*

3. The Board of Commissioners should meet at least once a year off site at an MPHA development/property. (RAB)

MPHA Response: *As noted in MPHA's response to similar comments in 2011, the Agency's Administrative offices are centrally located, easily accessible by bus routes and have available parking for Board and visitors. All MPHA residents and its over 10,000 Section 8 participants are familiar with this location. Moving Board meetings to various locations could create confusion for residents, participants and others who wish to attend MPHA Board meetings. We do not see that the benefit of having Board of Commissioners meetings in other locations, as outweighing the administrative burden and costs related to hosting such a meeting.*

4. MHRC supports RAB’s recommendation that MPHA Commissioners meet off-site at various MPHA housing locations at least once a year. This will give different groups of residents a chance to better understand the functioning of the board and potentially share their ideas and concerns, and would also help the Board better understand the communities they serve.

MPHA Response: *See previous answer.*

5. MPHA should partner with the broadband access project.

MPHA Response: *MPHA does partner with the Broadband Access Project (BAP) and hosts a site at its Glendale family development. MPHA is also forwarding this comment to the agency’s IT Committee to identify other possible ways it can work with both the City of Minneapolis and BAP to enhance opportunities for residents.*

6. MPHA should have e-cycling for electronics

MPHA Response: *Hennepin County has an e-cycling program for all county residents drop off locations are located at:*

- **Brooklyn Park**
*Hennepin County Recycling Center and Transfer Station
8100 Jefferson Highway, Brooklyn Park, MN 55445*
- **Bloomington**
*South Hennepin Recycling and Problem Waste Drop-Off Center
1400 West 96th Street, Bloomington, MN 55431*
- **You can call: 612 348-3777**

7. Although the MHRC Executive Committee has not yet had an opportunity to comment on the final priorities adopted by the Resident Advisory Board (RAB) yesterday, residents have already expressed strong agreement with RAB that security continues to be the number one priority for highrise residents, including improving relationships with the MPD and funding for Project Lookout. As you know, volunteers have really stepped up to the plate in response to the major guard cuts earlier this year. They now contribute over 64,000 hours of volunteer service in 29 highrises a year. It is critical that we support this essential program. (MHRC)

MPHA Response: *As noted in its response to similar comments, MPHA is currently in the process of considering funding requests and funding availability for 2013. MPHA understands that security is the number one priority for highrise residents. MPHA is reviewing the results of a comprehensive security assessment and will consider the need and the costs for security in conjunction with other funding needs.*

8. The MHRC Executive Committee voted to reiterate the importance of MPHA working closely with the MHRC on the implementation of its Smoke-Free Goal.

MPHA Response: *We welcome the opportunity to work with MHRC on the implementation of this Goal.*