

**IN THE DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION**

DOROTHY GAUTREAUX, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 66 C 1459
	)	
	)	Hon. Marvin E Aspen
CHICAGO HOUSING AUTHORITY, <i>et al.</i> ,	)	
	)	
Defendant.	)	

**MEMORANDUM IN SUPPORT OF PLAINTIFFS’ MOTION FOR ENFORCEMENT OF
COURT ORDERS AND OTHER RELIEF**

After a period of “re-assessment,” *see* Chicago Housing Authority, *FY2011 Moving to Work Annual Report* 19 (2012) (excerpt attached as “Exhibit A”), the Chicago Housing Authority (“CHA”) now proposes to rehabilitate 509 public housing units at its Altgeld Gardens/Philip Murray Homes development (“Altgeld”), adding some fifteen hundred more public housing residents to the approximately 4,000 persons already living at Altgeld.

Given the circumstances described below, the proposed rehabilitation would be unlawful because it would (1) violate the 1969 judgment order (“Judgment Order”) in this case, (2) violate an October 29, 1982 order (the “1982 Order,” attached as “Exhibit B”) in this case, and (3) violate duties CHA owes to plaintiffs under the federal fair housing law. After an appropriate hearing on the merits, plaintiffs will therefore be entitled to an order preventing the proposed rehabilitation. (Part I of Argument below.)

As also described below, the balance of harms and the public interest call for immediate, interim relief. Accordingly, after an appropriate hearing on such relief, plaintiffs will be entitled to an order preventing the proposed rehabilitation from going forward pending a hearing on the merits of their request. (Part II of Argument below.)

FACTS

At its inception in 2000, redevelopment of CHA's non-elderly public housing system (the "Plan for Transformation") was designed to proceed primarily on two tracks, roughly simultaneously. On one track, CHA would rehabilitate deteriorating non-elderly public housing units at a number of traditional (i.e., 100 percent public housing) sites, nearly all located in Gautreaux Limited Areas,¹ and maintain them as 100 percent public housing developments. On the second track, CHA would demolish buildings at other traditional public housing sites, many but not all in Gautreaux Limited Areas, and replace them with mixed-income developments that would include but not be dominated by public housing.²

Though many mixed-income developments were in Limited Areas, the Court had agreed (at plaintiffs' urging) to permit, under certain conditions, public housing units to be constructed as part of mixed income developments on these sites and to treat such units as "Gautreaux relief." As the Court said when that proposal was first made to it in connection with a proposed order for Henry Horner Homes, "[T]his proposed order] does . . . do[] something about the

¹ A "Limited Area" is a census tract in Cook County having a 30 percent or greater African American population. *Gautreaux v. Chicago Hous. Auth.*, 304 F. Supp. 736, 737 (1969) ("Judgment Order"). A Cook County census tract with less than a 30 percent African-American population is in the "General Area." *Id.*

² The Plan for Transformation also included rehabilitation of scattered site units, most developed by The Habitat Company as Receiver in both Limited and General Areas approved by the Court, and rehabilitation of elderly units. Elderly units were not addressed by the Judgment Order or by subsequent Gautreaux orders except as described below.

ghettoes of the City of Chicago . . . I think it's really a 21st century view of what Gautreaux ought to be about." Tr. Proceedings 43, Mar. 8, 1995 (excerpt attached as "Exhibit C").

The plaintiffs have always strongly supported the Plan for Transformation, and have supported as well the numerous orders this Court has entered over the years authorizing the development of public housing "remedial units" as part of mixed income developments. *See, e.g.,* Order, Dec. 12, 2002 (revitalizing order) (attached as "Exhibit D"); Order, Apr. 17, 2006 (waiver order) (attached as "Exhibit E").³

For some years, through 2008, development of non-elderly public housing units proceeded along both tracks. The stream of rehabilitated units in traditional sites in Limited Areas was roughly "matched" by the stream of public housing "remedial units" planned as part of new mixed-income developments, roughly in compliance—treating "remedial units" as the equivalent of General Area units—with the Judgment Order requirement that Limited Area units be "matched" by General Area units.⁴

Then, beginning in 2009, following dramatically changed economic circumstances as the nation plunged into financial crisis, the stream of mixed-income redevelopment, including its public housing units, slowed to a trickle.⁵ In this context, with rehabilitation of Altgeld only two-

3. In these orders, the Court has always determined that the public housing units authorized to be developed are "designed to achieve results consistent with the Judgment Order previously entered in this case." *E.g.,* Order, Apr. 17, 2006 (Exhibit E).

⁴ Though the original Judgment Order required that 75 percent of new family public housing units be located in the General Area, a 1982 order allowed half of new family units to be located in Limited Areas, provided that new construction, acquisition, and/or rehabilitation of family units would not commence in a Limited Area until a like amount of construction, acquisition, and/or rehabilitation was commenced in the General Area. *See* 1982 Order (Exhibit B) at 2. Because planning and developing new mixed income communities takes longer than rehabilitating existing units, rehabilitated units (2949) exceeded the number of completed mixed income remedial units (2054) during the period prior to 2009. Plaintiff's compilation based on Chicago Housing Authority, *FY2012 Moving to Work Annual Report* 106–09 (2013) (excerpt attached as "Exhibit F").

⁵ Whereas 328 mixed income remedial units were completed in 2008, only 88 were completed in 2013 and only 40 are projected for 2014. *See* Chicago Housing Authority, *FY2012 Moving to Work Annual Report* 106–07 (2013) (Exhibit F); Chicago Housing Authority, *FY 2013 Moving to Work Annual Report* 6 (2014) (excerpt attached as

thirds complete, CHA decided in 2010 to halt rehabilitation at Altgeld in order to reassess the site's long-term development needs. Chicago Housing Authority, *FY2011 Moving to Work Annual Report* 19 (2012) (Exhibit A). Altgeld, by far the largest of CHA's traditional developments, originally consisted of 1,998 units, some 1,323 of which had been rehabilitated before CHA's decision to halt further such work (Exhibit F, 108).

Since CHA's decision to halt Altgeld rehabilitation, there has been no return to pre-2009 levels in the stream of remedial public housing units in mixed-income developments. CHA nonetheless recently decided to resume work at Altgeld, declaring its intention to rehabilitate some 509 long-vacant public housing units there, thus to introduce some fifteen hundred additional public housing residents into the development. *See, e.g., Chicago Housing Authority, Minutes of the Commissioners of the Chicago Housing Authority* 3–4, 9 (Feb. 18, 2014) (authorizing funds regarding rehabilitation of “approximately 509 off-line units” at Altgeld) (excerpt attached as “Exhibit G”).

While segregated, concentrated enclaves of public housing still exist in the CHA system, the unique circumstances at Altgeld—including its size, geographic isolation, current racial concentration, and lack of community resources—make the prospects for future economic or racial integration especially poor. Built in 1945, Altgeld currently houses over 4,000 thousand persons, many hundreds of whom are children, in over 1,300 units, 100 percent of which are public housing. The development is located on Chicago's far south side (south of 130th Street) in the Riverdale Community Area, a community bounded in every direction by physical barriers—

“Exhibit H”); Chicago Housing Authority, *FY2014 Moving to Work Annual Plan* 12 (2014) (excerpt attached as “Exhibit I”). In addition, the financial crisis has made it more difficult to maintain a true “mix” of housing types at mixed income developments. The existing public housing units at these sites are thus surrounded by fewer for-sale and other market rate units than originally anticipated, limiting the prospects for economic integration.

the Calumet River to the west and south, the Bishop Ford Freeway to the east, and the Metro Water Reclamation District to the north.⁶

The site's geographic isolation is compounded by a dearth of public transportation; a single CTA bus serves Altgeld, and the ride from Altgeld to the nearest CTA train station takes over a half hour. Thus, residents must often rely solely on the minimal retail options available locally.⁷

In the census tract of which Altgeld is a part, social conditions are dire. Over *half* the families in the census tract live below the poverty level. U.S. Census Bureau/American FactFinder, *Selected Economic Characteristics, 2008–12 American Community Survey* (2014). Nearly two-thirds of the population are either unemployed or out of the labor force. *Id.* A recent study of Altgeld reports high rates of crime, illegal drug dealing and use, and a high incidence of anxiety and depression among residents. Chantal Hailey & Priya Saxena, *HOST: Helping Families, Building Community*, Urban Institute Brief #5, Oct. 2013 (attached as “Exhibit J”), at 3. The study also reports that Altgeld women and children live in a “coercive sexual environment” and that over *two-thirds* of Altgeld youth have heard gun shots more than once in the past year. *Id.* at 4.

The precarious situation of children living at Altgeld is not ameliorated by the neighborhood's public education options. All four elementary schools serving Altgeld are among the city's worst, with low performance scores on state examinations. Chicago Public Schools, *2013 School Progress Report* (2013) (excerpt attached as “Exhibit K”). Finally, Altgeld is plagued not only by high poverty and resource deprivation but also by racial segregation. Over

⁶ Riverdale also contains three smaller, low-income developments, which neighbor Altgeld.

⁷ The neighborhood contains a handful of small convenience stores, but the nearest large retail outlets such as Target or Wal-Mart are at least four miles away.

96% of residents within the census tract are African American, and almost all adjacent tracts are over half African American. U.S. Census Bureau/American FactFinder, *Profile of General Population and Housing Characteristics, 2010 Census Summary File 1* (2010).

Under these circumstances, adding over 500 public housing families to Altgeld, that is, some fifteen hundred persons, many hundreds of whom will be children, and virtually all of whom will likely be low-income and African American, *cf.* Chicago Housing Authority, *2012 Moving to Work Annual Report* 48–49 (2013), Exhibit F (providing waitlist statistics prior to waitlist update in 2012), would more deeply entrench the present racial segregation, add further strain upon Altgeld’s limited resources and living conditions, and condemn Altgeld’s current and new residents to a continued state of economic and racial segregation for the foreseeable future. If, as this Court has said, a “revitalizing” area is one characterized by circumstances supporting a responsible forecast of “economic integration, with a longer term possibility of racial desegregation,” *e.g.*, Order, Dec.12, 2002, Exhibit D, at 1, Altgeld is plainly not such an area. Rather, it is a geographically isolated, racially concentrated, resource-poor, extremely low-income community that suffers from the social conditions that plague high poverty neighborhoods generally.

Moreover, should the rehabilitation be completed, many hundreds of families currently on CHA’s public housing waitlist, a vast majority of whom are members of the Gautreaux class, *Gautreaux v. Chicago Hous. Auth.*, 265 F. Supp. 582, 583 (N.D. Ill. 1967) (defining plaintiff class as African American “tenants in or applicants for public housing”), would be offered Altgeld as their housing “choice.” A refusal to accept this segregated “choice” risks loss of waitlist status, because under CHA’s waitlist procedures a family reaching the top of the list is given the option of (a) accepting a unit in the location offered or (b) being removed from the

waitlist unless good cause for refusal can be shown. *See* Chicago Housing Authority, *FY2011 Admissions and Continued Occupancy Policy (ACOP)* § III(C) (2011) (excerpt attached as “Exhibit L”). Thus, should Altgeld rehabilitation proceed as planned, some 500 Gautreaux families will face the Hobson’s choice of living in segregated public housing at Altgeld or prejudicing their prospect of gaining admission to public housing.

ARGUMENT

I. CHA’s Proposed Rehabilitation of Over 500 Units at Altgeld Would Violate Two Orders of this Court and Federal Fair Housing Law.

A. Rehabilitating an additional 500 public housing units at Altgeld would violate Section VIII of the Gautreaux Judgment Order.

The Judgment Order places specific constraints on CHA’s future administration of its system. But recognizing that the system’s racial segregation might be maintained or reinforced in ways not explicitly contemplated by the Order’s specific provisions, the Court also included the following general obligation in section VIII of the Order:

CHA shall affirmatively administer its public housing system *in every respect (whether or not covered by specific provisions of this judgment order)* to the end of disestablishing the segregated housing system which has resulted from CHA’s unconstitutional [practices].

Judgment Order at 741 (emphasis added). As a matter of logic, the duty to affirmatively administer its system to the end of disestablishing segregation obligates CHA to refrain from actions that will have the effect of *expanding and perpetuating* racial segregation within its public housing system. Adding fifteen hundred more African American persons to Altgeld, and forcing over 500 families to choose between living in segregated housing or being removed from the public housing waitlist, would have just that effect.

Theoretically, placement of any additional African American public housing families in a predominantly African American community is a step toward expansion and perpetuation of segregation. But the Judgment Order declined to adopt this theoretical view, which would have effectively prohibited any further residential development of any sort at African American public housing sites. Instead it adopted a balanced—“matching”—approach, allowing further development in Limited Areas so long as it was matched by development, originally 3:1, later 1:1, in General Areas.⁸ *Id.* at 738. Thus, as discussed above, once this Court accepted mixed-income public housing units as “remedial,” the Plan for Transformation was able to proceed on its two tracks.

Now, however, as described above, the situation has dramatically changed, and there are no longer two roughly equivalent tracks proceeding forward simultaneously. Absent a General Area matching “track,” there can be no question that, in the unique racial and socio-economic circumstances at Altgeld, the size of the proposed addition would constitute expansion and perpetuation of segregation in violation of CHA’s duty to administer its public housing system, *in every respect, even if not covered by a specific judgment order provision*, to disestablish segregation in its public housing system. The proposed rehabilitation at Altgeld would do the exact opposite—expand and perpetuate segregation without the justification of “matching” units.

B. Rehabilitating an additional 500 units at Altgeld would violate the 1982 Gautreaux Order.

The original Judgment Order required CHA to construct three public housing units in the General Area for each unit of public housing constructed in a Limited Area. Judgment Order at

⁸ The order initially required that within three months following commencement of Limited Area construction, 75 percent of all family units were to be located in the General Area. Judgment Order at 738. In 1982, this requirement was altered so that “not less than 50%” of family units were required to be located in the General Area, and construction of family units in a Limited Area could not commence until a like amount of construction had commenced in the General Area. 1982 Order, Exhibit B, at 2.

738. But the Order did not explicitly cover the development of elderly units or the rehabilitation of existing family units. To avoid the political challenges of developing new public housing units for families in predominantly white neighborhoods, CHA could thus divert funds eligible for General Area family unit construction to the more politically expedient construction of elderly units or rehabilitation of existing family units in Limited Areas.

In 1982, the Gautreaux plaintiffs and CHA struck a compromise. New HUD funding was available to resume stalled public housing development, and a new Mayor said she was ready to restart the stalled public housing engine. The Court entered an agreed order embodying the compromise. Order, Oct. 29, 1982, Exhibit B. Among other things, in addition to parceling out how the new money could be spent, the order modified the 3:1 General-to-Limited-Area ratio of the Judgment Order, lowering the ratio to 1:1, a major concession by plaintiffs to CHA. In exchange, however, the order added new restrictions on CHA development activities. To prevent diversion of funds away from General Area family unit construction, the order prohibited HUD from reserving authority for elderly units “without further order of this Court.” *Id.* at 2. And to prevent CHA from rehabilitating Limited Area units without simultaneous development in the General Area, the order provided the following:

No acquisition and/or rehabilitation of family public housing units outside the [General Area] shall commence until a like amount of acquisition and/or rehabilitation of family public housing units in the [General Area] has commenced.

Id. Thus, under the compromise, the required ratio of General to Limited Area units was reduced, but CHA was restricted both in its ability to divert funds into more elderly construction and in its ability to diverge from the matching requirement applicable to family development, including through rehabilitation of existing units.

As CHA's Plan for Transformation initially moved forward on parallel tracks—roughly matching the rehabilitation of traditional public housing developments in Limited Areas with the planning and development of new mixed-income “remedial” units in revitalizing areas—the Gautreaux plaintiffs supported the Plan as complying with the spirit of the 1982 Order. But now that mixed-income development has slowed to a trickle, and 509 matching General Area units have not been “commenced,” the rehabilitation of 509 more units at Altgeld would be a violation of the express terms of the 1982 Order. Therefore, in addition to violating Article VIII of the Judgment Order, the proposed Altgeld rehabilitation would, unless and until CHA “commences” development of 509 “matching” General Area units, also violate the 1982 Order.

C. Rehabilitating an additional 500 units at Altgeld would violate the Fair Housing Act.

Although CHA's decision to rehabilitate the additional units at Altgeld is facially neutral with respect to race, the inevitable effect of that decision—to enlarge and perpetuate segregation—renders it unlawful under the Fair Housing Act. Under the Act, housing authorities must take “[a]ction . . . to fulfill, as much as possible, the goal of open, integrated residential housing patterns and to prevent the increase of segregation, in ghettos, of racial groups whose lack of opportunities the Act was designed to combat.” *Otero v. New York City Hous. Auth.*, 484 F.2d 1122, 1134 (2d Cir. 1973). The goal of the Act was “to replace the ghettos ‘by truly integrated and balanced living patterns.’” *Trafficante v. Metro. Life Ins. Co.*, 409 U.S. 205, 211 (1972)) (quoting 114 Cong.Rec. 3422 (statement of Sen. Mondale)). The Act thus prohibits, among other things, discrimination “because of race.” 42 U.S.C.A. § 3604(b) (West).

In this Circuit, “discrimination because of race” includes “conduct that has the necessary and foreseeable consequence of perpetuating segregation,” because such conduct “can be as

deleterious as purposefully discriminatory conduct . . .” *Metro. Hous. Dev. Corp. v. Vill. of Arlington Heights*, 558 F.2d 1283, 1289 (7th Cir. 1977). Where, as here, the Court is asked to evaluate a housing authority’s facially neutral decision about housing, the Court should look at “the effect which the decision has on the community involved; if it perpetuates segregation and thereby prevents interracial association it will be considered invidious under the Fair Housing Act.” *Id.* at 1290.

As discussed above, the effect of rehabilitating over 500 non-elderly units and housing some fifteen hundred additional African American persons at Altgeld is obvious: racial segregation will be enlarged and perpetuated. Given this consequence of the decision, the remaining *Arlington Heights* considerations cannot save CHA’s decision from illegality under the Fair Housing Act. *See id.* at 1290 (discussing four factors to be weighed). Here, for example, CHA’s interest in delivering a few hundred additional units cannot outweigh the harm of enlarging and perpetuating segregation in the Altgeld circumstances. Thus, CHA’s proposed rehabilitation of additional units at Altgeld must be considered “invidious under the Fair Housing Act” and therefore unlawful.

II. CHA’s Proposed Rehabilitation would Cause Immediate and Irreparable Harm; the Balance of Harms and the Public Interest Both Favor Immediate Interim Relief.

Expending money irretrievably on further Altgeld rehabilitation (money that should be spent on generating Gautreaux relief), enlarging racial concentration at the already segregated Altgeld site, and requiring over 500 more Gautreaux families on CHA’s waitlist to choose between segregated living and prejudicing their prospects of gaining admission to public housing collectively constitute immediate and irreparable harm. The balance of harms and the public interest militate against permitting such a result. Thus, following an appropriate hearing,

plaintiffs will be entitled to an order preventing the proposed rehabilitation from going forward until a merits hearing is held.

Because CHA is already subject to injunctive orders which its proposed action will violate (the Judgment Order and the 1982 Order), an order enforcing the extant orders—not a new injunction—is all that is required. Nonetheless, the requirements for a preliminary injunction are satisfied here.

To “win a preliminary injunction, a party must show that it has (1) no adequate remedy at law and will suffer irreparable harm if a preliminary injunction is denied and (2) some likelihood of success on the merits.” *Am. Civil Liberties Union of Illinois v. Alvarez*, 679 F.3d 583, 589 (7th Cir. 2012). Once the moving party makes this threshold showing, the court “weighs the factors against one another, assessing whether the balance of harms favors the moving party or whether the harm to the nonmoving party or the public is sufficiently weighty that the injunction should be denied.” *Id.*

Unless immediate, interim relief is forthcoming from this Court, CHA will proceed on its publicly stated intention to commence rehabilitation this year of over 500 public housing units at Altgeld, and to fill these units with families from the CHA waitlist—that is, Gautreaux class members. That will result in an irretrievable expenditure of funds that should be spent on providing further Gautreaux relief. Moreover, the influx of African American persons at Altgeld will both enlarge existing racial segregation at the site and force over 500 Gautreaux families to choose between living in segregated public housing or prejudicing their chances of gaining admission to public housing. Collectively, these foreseeable consequences constitute irreparable harm for which there is no adequate remedy at law. *See Arlington Heights*, 558 F.2d at 1289–90

(conduct that perpetuates segregation frustrates “the national commitment to [integrated housing]”). Because as discussed in Part I above, plaintiffs are likely to succeed on the merits, the threshold showing for immediate, interim relief is made.

Because the expansion and perpetuation of racial segregation is clearly under the cases antithetical to the public interest and not outweighed by any comparable harm a remedial order would cause to CHA, the balance of harms respecting “non-merits” factors favors immediate, interim relief. *See, e.g., Davis v. New York City Hous. Auth.*, 278 F.3d 64, 66 (2d Cir. 2002) (affirming injunction preventing housing authority from taking action that would cause perpetuation of past segregation); *Glendale Neighborhood Ass’n v. Greensboro Hous. Auth.*, 901 F. Supp. 996, 1001–02 (M.D.N.C. 1995) (issuing preliminary injunction where proposed public housing project would increase racial concentration and produce irreparable harm of racially segregated neighborhood). *Cf. United States v. Sch. Dist. of Ferndale, Mich.*, 577 F.2d 1339, 1353 (6th Cir. 1978) (reversing denial of preliminary injunction, stating: “It is axiomatic that black students . . . suffer irreparable harm from the maintenance of a segregated school system.”) (citing *Brown v. Board of Education*, 347 U.S. 483, 493-95 (1954)).

CONCLUSION

For the reasons given, plaintiffs request that—following an appropriate preliminary hearing—an order be entered staying CHA’s proposed rehabilitation at Altgeld until a hearing on the merits of plaintiffs’ request can be held.

Respectfully submitted,

/s/ Alexander Polikoff
One of the Attorneys for Plaintiffs

June 13, 2014

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EXHIBIT A



CHANGE.
CHICAGO HOUSING AUTHORITY

Case: 1:66-cv-01459 Document #: 449-1 Filed: 06/13/14 Page 2 of 3 PageID #:4971

Approved FY2011 Moving to Work Annual Report
Plan for Transformation Year 12
March 30, 2012

Section II: General Housing Authority Information

• • •

- Relocation Resources: 97 units – These units are held vacant to help CHA comply with the Relocation Rights contract by ensuring we have units available for residents undergoing relocation. This legal contract has been in place since 2000 and these units are held for 10/1/99 residents covered under the contract.

CHA is working to bring these units back online as quickly as possible.

Units Offline for Planning and Not Included in Overall 25,000-Unit Delivery Progress

In addition to the units described above, there are other public housing units currently offline as CHA undertakes redevelopment planning at sites across the city through the Plan for Transformation.

Units Offline for Planning and Not Included in Overall 25,000-Unit Delivery Progress	
Category	Total Units
Pending Demolition/Disposition	61
Redevelopment Planning (Timeline TBD)	1,859
Total Units	1,920

The units in this category are offline for the following reasons:

- Pending Demolition/Disposition: This category includes units slated for demolition or pending disposition.
- Redevelopment Planning: This category includes units at sites with redevelopment planning underway and also sites for which CHA is exploring options for future plans.
 - Altgeld Gardens/Phillip Murray Homes- As stated in the FY2011 MTW Annual Plan, CHA is exploring options for Altgeld/Murray, including integrating other housing types, commercial, or social service components within or adjacent to the property. All unit rehabilitation activity is pending a re-assessment of long-term redevelopment needs at this site.
 - Frances Cabrini Rowhouses- As mentioned in the FY2012 Annual Plan, CHA has reassessed its previous plans for the non-rehabilitated section of the Cabrini Rowhouses and will no longer support 100% public housing at the Rowhouse property. Therefore, CHA will work with the Near North Working Group group to incorporate the Cabrini Rowhouse property into the broader Request for Qualifications (RFQ) being developed by the Near North Working Group.
 - Lathrop Homes- CHA is planning for the redevelopment of this site with the Lathrop Working Group and selected developer, Lathrop Community Partners. In FY2011, CHA conducted relocation for consolidation from the north end to the south end of the site.

Unit Delivery Progress vs. Total Public Housing Units

CHA's progress toward the 25,000 unit delivery goal is not the same as the total number of public housing units CHA owns or manages or the number of online public housing units. Public housing units renovated or redeveloped through the Plan ten to twelve years ago, though counted toward unit delivery

EXHIBIT B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RECEIVED
OCT 29 1982

Judge Marvin E. Aspen
U. S. District Court

DOROTHY CAUTREAUX, et al.,)

Plaintiffs,)

-v-)

SAMUEL R. PIERCE, Secretary of)
Department of Housing and)
Urban Development, et al.,)

Defendant.)

Nos. 66 C 1459
66 C 1460
(Consolidated)

ORDER

This matter coming to be heard on plaintiffs' motion pursuant to the provisions of Article X of the judgment order of July 1, 1969, whereby this Court has retained jurisdiction of this matter for all purposes particularly enumerated therein, and

The Court having determined that the several provisions of this order modifying said judgment order are based upon relevant information with respect to the subject matter thereof, and that said provisions are appropriate and consistent with and in furtherance of the reasons for the issuance of said judgment order,

It is hereby ordered:

1. Notwithstanding the provisions of any other order of this Court, including without limitation the provisions of Article III of said judgment order of July 1, 1969, the Chicago Housing Authority (CHA) and the Department of Housing and Urban Development (HUD) shall be free to carry out a development program for 175

family public housing units reserved by HUD for CHA in fiscal year 1981, and CHA shall be free to propose to HUD, HUD shall be free to approve and both defendants shall thereafter be free to carry out future development programs for family public housing units (new construction and acquisition with and without rehabilitation) which may be reserved by HUD for CHA in subsequent fiscal years, under which not less than 50% of such units are located in the General Public Housing Area (GPHA), provided, however,

- (a) No new construction of family public housing units outside the GPHA shall commence until a like amount of new construction of family public housing units in the GPHA has commenced; and
- (b) No acquisition and/or rehabilitation of family public housing units outside the GPHA shall commence until a like amount of acquisition and/or rehabilitation of family public housing units in the GPHA has commenced.
- (c) No additional authority for CHA elderly units shall be reserved without a further order of this Court.

2. For purposes of development programs for family public housing (new construction and acquisition with and without rehabilitation) proposed by CHA to HUD and approved by HUD subsequent to the entry of this order, the GPHA shall mean that part of the City of Chicago which lies within the census tracts listed on page 1 of Exhibit A and that part of the County of Cook outside

the City of Chicago that does not lie within census tracts listed on page 2 of Exhibit A. Exhibit A is attached hereto.

3. Except as and to the extent specifically provided in this order, this Court's judgment orders previously entered herein, as previously modified, remain in full force and effect, including without limitation the provision of Article VIII of said judgment order of July 1, 1969, that "CHA shall use its best efforts to increase the supply of Dwelling Units as rapidly as possible in conformity with the provisions of this judgment order and shall take all steps necessary to that end..."

4. This Court retains jurisdiction of this matter for all purposes, including enforcement and issuance, upon proper notice and motion, of orders modifying or supplementing the terms of this order upon the presentation of relevant information with respect to proposed housing developments designed to achieve results consistent with judgment orders previously entered herein, material changes in conditions existing at the time of this order or any other matter.

Enter:



Judge, United States District Court

DATED: 10-29-62

EXHIBIT A
CENSUS TRACT NUMBERS

102 through 109	1901 through 1914	6101 through 6108
201 through 209	2001 through 2006	6111 through 6115
301 through 310	2101 through 2109	6201 through 6204
318 through 319	2201 through 2229	6302 through 6305
401 through 410	2301 through 2305	6307 through 6309
501 through 515	2401 through 2408	6401 through 6408
601 through 634	2501 through 2505	6501 through 6505
701 through 717	3001 through 3002	6602 through 6606
801 through 802	3005 through 3012	6608 through 6609
810 through 817	3014 through 3020	6611
901 through 903	3101 through 3115	7001 through 7005
1001 through 1007	3201 through 3206	7204 through 7205
1101 through 1105	3401 through 3405	7401 through 7405
1201 through 1204	5201 through 5206	7503 through 7505
1301 through 1305	5501	7601 through 7605
1401 through 1408	5605 through 5613	7701
1501 through 1512	5701 through 5705	8117
1601 through 1613	5801 through 5811	8209
1701 through 1711	5901 through 5907	8408
1801 through 1803	6001 through 6016	

[Census tracts constituting "General
Area" within City of Chicago]

EXHIBIT A

CENSUS TRACT NUMBERS

8092

8095 through 8098

8101 through 8103

8121

8125 through 8126

8130 through 8131

8170 through 8180

8204

8214

8236.03

8243 through 8244

8248 through 8249

8251

8255.01

8255.02

8255.03

8256

8268 through 8276

8290 through 8291

8293 through 8294

8297 (East Chicago Heights portion)

8303

[Census tracts excluded from "General Area"
within Cook County outside City of Chicago]

EXHIBIT C

ORIGINAL 1

1 THE UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF ILLINOIS
3 EASTERN DIVISION

05-3578

3 DOROTHY GAUTREAUX, et al.,)
4 Plaintiffs,)
5 vs.)
6 SAMUEL R. PIERCE, et al.,)
7 Defendants.)

Docket No. 66 C 1459
No. 66 C 1460

Chicago, Illinois
March 8, 1995
3:00 o'clock p.m.

8 TRANSCRIPT OF PROCEEDINGS - STATUS
9 BEFORE THE HON. MARVIN E. ASPEN

10 APPEARANCES U.S.C.A.—7th Circuit

FILED

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Business and Professional
People for the Public Interest
(17 East Monroe Street
Chicago, Illinois 60603)

H. Stuart Cunningham, Clerk
United States District Court

JUL 11 1995

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U.S.C.A.—7th Circuit
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GINO J. AGNELLO
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MARY M. GALLAGHER, CSR

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1 APPEARANCES: (continued)

2 MR. WILLIAM P. WILEN
3 Legal Assistance Foundation
4 of Chicago
(343 South Dearborn Street
Chicago, Illinois 60604)

5 Court Reporter: MS. MARY M. GALLAGHER
6 (219 South Dearborn Street
7 Room No. 1944
Chicago, Illinois 60604)
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MARY M. GALLAGHER, CSR

1 THE CLERK: 66 C 1459, 66 C 1460, Gautreaux versus
2 CHA, et al.

3 MR. POLIKOFF: Good afternoon, your Honor.

4 THE COURT: Good afternoon.

5 MR. POLIKOFF: We very much appreciate your making
6 this time available to us in what I know is a busy schedule.

7 We are here on Gautreaux, but as you know we are here
8 on a matter that is related to an independent matter in which
9 the Gautreaux plaintiffs are not parties, in a formal sense,
10 the Horner matter.

11 And here with me in the courtroom today and prepared
12 to answer your questions are personnel, the chairman and
13 lawyers from CHA, personnel from HUD, Mr. Eisendrath, the
14 special representative of the Secretary and members of his
15 staff, and also the Receiver and members of the Receiver's
16 staff, probably other people I should mention -- oh, Mr. Wilen
17 from Legal Assistance Foundation, who represents the plaintiffs
18 in the Horner litigation and members of his staff, and one or
19 more consultants to the Horner plaintiffs. And probably other
20 people are here as well who you may call upon as you see fit.

21 THE COURT: Okay.

22 MR. POLIKOFF: What I would like to do this afternoon
23 is to take a very short time, just a very few minutes, less
24 than five, I think, to set the procedural context for you, and
25 then within that context we'll make a factual presentation.

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1 And if you let us get that far, we'll get to the point of
2 asking you to indicate a willingness to sign an order, which
3 has not yet been drafted because we want to hear from you, but
4 which we would then draft if you're favorably inclined and ask
5 you to make the decision on promptly.

6 As you know, the -- I think you know, the preliminary
7 hearing on the Horner consent decree is scheduled to commence
8 before Judge Zagel on Friday morning.

9 Well, here's the procedural context, your Honor: CHA
10 proposes to demolish some public housing in what I'm going to
11 call the Horner revitalization area; I will describe that to
12 you geographically in a moment. We have something on the easel
13 here for that purpose.

14 As you also know, the law presently requires that when
15 public housing is demolished, it be replaced unit for unit.
16 For every physical unit that is taken down, you have to put up
17 another physical unit. That's the way the law stands today.

18 Now, ordinarily under the existing Gautreaux orders
19 that replacement housing, as I will call it, could go 50
20 percent in the limited public housing area provided
21 simultaneously 50 percent of it went into the general public
22 housing area. And if that were the proposal, there would be no
23 need to come before you today.

24 The reason we are here is that we're going to be
25 asking you to decide that some portion beyond 50 percent can go

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1 into the Horner revitalizing area. Some portion of the
2 replacement housing to be built for the units to be demolished
3 above the 50 percent limit in the current Gautreaux orders
4 could go into this Horner revitalizing area.

5 We are not going to be asking you to tell us today
6 what that number is, only to tell us whether in your view,
7 after you hear today's presentation, some number to be
8 determined beyond the 50 percent could go in this area.

9 The area I am talking about --

10 THE COURT: In other words, you want a blank check?

11 MR. POLIKOFF: No. Quite to the contrary.

12 The procedure we envision involves coming back to you
13 when certain facts are known that are not known today, and at
14 that point, far from wanting a blank check, you will be filling
15 in the numbers on the check as you then determine. And
16 whatever those numbers are, those are the numbers.

17 We will be making a presentation to you at that time
18 as to what we think the numbers ought to be, but while you've
19 always listened to us very carefully, you've not been known to
20 slavishly follow my recommendations on every occasion. And I
21 don't expect you'll necessarily do it on this one either.

22 THE COURT: Most occasions, Mr. Polikoff.

23 MR. POLIKOFF: The area we're talking about, your
24 Honor -- I have termed it the Horner revitalization area for a
25 reason I'm sure you understand and that I will expand on

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1 units, public housing units, be provided for the families who
2 have to be housed, and all the parties are of the view that one
3 way or another, inside this area and outside this area, we can
4 accomplish that.

5 You could go to 51 percent. I mean, we are not asking
6 for a blank check, to use the phrase you referred to at the
7 beginning. You could wind up and give us only a small number
8 of units, and then we would have to figure out ways to put a
9 larger number in the Gautreaux public housing area. But you
10 won't have to decide that until the specifics are presented to
11 you.

12 So, that's the pitch. If you agree, we hope you'll
13 tell us about it now or soon and we'll draft an appropriate
14 order. And if you don't agree, well, thank you anyway for your
15 time.

16 THE COURT: Well, let me, first of all, thank you,
17 Mr. Polikoff, and all the other representatives of CHA, HUD,
18 the Receiver -- who's done a yeoman job, not only obviously in
19 this project but in all the Receiver's undertakings since his
20 appointment -- LAF and the other interested agencies.

21 We have really built, I think, a very historic
22 consensus since the Gautreaux case was first filed in 1966.
23 This case before and after the first consent decree was
24 essentially an adversary proceeding and the adversaries
25 changed. Sometimes the city was on the left, sometimes the

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1 city was on the right, sometimes the federal government was on
2 one side, sometimes on the other side.

3 I will say this quite frankly: There were transparent
4 political agendas on behalf of principals in this litigation in
5 the past. I think, in my view -- and maybe I'm becoming naive
6 or perhaps wistful in my older years, but I think, in my view,
7 this is a historic occasion because for the first time
8 everybody is on the same wavelength. There is a commitment on
9 all agencies, federal, local, private, to do something about
10 the housing mess that we've inherited and that has festered
11 through the years.

12 And not only is everybody on the same wavelength, but
13 I think there are no hidden agendas. Or if there are hidden
14 agendas, you've done a masterful job of hiding them from me
15 because I can't ascertain any. And I think that really is as
16 important as anything that has happened in the more than 30
17 years that Mr. Polikoff has lived with Gautreaux, and I am
18 including the pre-filing stages as well.

19 Gautreaux has changed through the years, not only in
20 terms of the changes that I've commented on but changes in
21 society and changes in urban life.

22 There's no question that Gautreaux initially was a
23 lawsuit and the consent decree was a relief in response to a
24 segregated city. And I -- and perhaps I'm being sanguine again
25 -- see the changes in the city. I think that economically

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1 people of all races can live where they want to in the city,
2 and that's an important step.

3 I think in spite of many problems that we have to deal
4 with, just as we have made progress significantly in terms of
5 urban integration or urban -- or relief from urban segregation,
6 the problems of urban housing, putting aside racial problems,
7 have, if anything, in my view become worse by both neglect and
8 also because of the unfortunate monetary crunch that all
9 federal and local governments are under these days.

10 To me, your proposal is one that addresses a 21st
11 century view of the City of Chicago and its housing problems as
12 opposed to the 1966 view that was properly the view at the time
13 of the filing of the Gautreaux litigation.

14 It is important to finally admit, not only in
15 conversation and debate but by action taken, the terrible
16 mistake of public high-rise housing and to be doing something
17 tangible to rectify that mistake.

18 I think your proposed revitalization project improves
19 the landscape of the City of Chicago, not only physically,
20 which you can see on the plats and plans, but also has a view
21 of improving the quality of life in the City of Chicago. And
22 perhaps this, if successful -- and you can't get excited about
23 anything in Chicago unless you see it come through to fruition.
24 But if this is successful, this could be a model for similar
25 projects all over the city, where they are needed obviously

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1 just as much as they are needed in the Horner area.

2 Although this project does not directly impact on the
3 goals of racial integration that the Gautreaux consent decree
4 was designed primarily to address, it does have an impact in
5 the broad sense of doing something about the ghettos of the
6 City of Chicago, which I think are the source of obviously
7 misery for those people who live in them and social excuses for
8 others to live in a community where people of differing
9 backgrounds, economic, social, racial and culturally, can live
10 together. As I said before, I think it's really a 21st century
11 view of what Gautreaux ought to be about.

12 And at the risk of being characterized as one of those
13 dreaded activist judges, I would certainly consent to this
14 project as a revitalization area and will sign an order to that
15 effect, of course reserving the right to look at the numbers as
16 the project comes to completion.

17 MR. POLIKOFF: Thank you, your Honor.

18 Would you be around tomorrow so we can present that
19 order to you?

20 THE COURT: Yes.

21 MR. POLIKOFF: Okay. Thank you again for your time.

22 THE COURT: Thank you all for coming in. I appreciate
23 it.

24 MR. POLIKOFF: Thank you, your Honor.

25

MARY M. GALLAGHER, CSR

1 (Which were all the proceedings had at the hearing of
2 the within cause on the day and date hereof.)

3 CERTIFICATE

4 I HEREBY CERTIFY that the foregoing is a true,
5 correct and partial transcript of the proceedings had at the
6 hearing of the aforementioned cause on the day and date hereof.

7 
8 Official Court Reporter
9 U.S. District Court
10 Northern District of Illinois
Eastern Division

7-10-95
Date

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MARY M. GALLAGHER, CSR

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DOROTHY GAUTREAUX, et al.

Plaintiffs,

VS.

CHICAGO HOUSING AUTHORITY

Defendants.

66 C 1459

Hon. Marvin E. Aspen

AGREED ORDER

This matter coming to be heard on the joint motion of the Plaintiffs and the Defendant Chicago Housing Authority for an order to expand the Horner Revitalizing Area ("HRA") by adding the area of the City of Chicago bounded by Lake Street on the North, Washington Boulevard on the South, Hermitage Avenue on the East and Damen Avenue on the West, to permit development of family public housing units within the expanded HRA, to authorize adoption of certain measures that may be taken to further promote economic integration, to permit families with children to be housed in certain public housing units above the third story within the HRA, subject to the plaintiff's written approval and to authorize allocation of Gautreaux funding to aid such development; and

The Receiver, Daniel Levin and the Habitat Company, having represented to the Court that the Expansion Area is an appropriate and desirable location for approximately 271 public housing units; and

The Court being cognizant that the principal remedial purpose of the orders previously entered in this case has been to provide plaintiff class families with desegregated housing opportunities; and

The Court also being cognizant that on occasion it has permitted public or assisted housing to be provided in census tracts other than the General Public Housing Area upon a sufficient showing of "revitalizing" circumstances such that a responsible forecast of economic integration, with a longer term possibility of racial desegregation, could be made; and

The Court being of the view that based on the circumstances described in the joint motion and supporting affidavit, such a forecast can be made with respect to the expanded HRA if the terms and conditions of this order are met; and

The Court being of the view that additional economic integration within the originally designated HRA is desirable; and

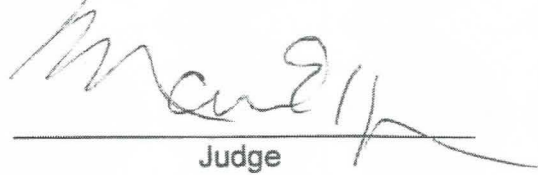
The Court being of the view that permitting families with children to be housed in certain public housing units above the third story within the HRA, subject to the plaintiff's written approval of the initial location and configuration of such units, will be an

appropriate and desirable way to create viable mixed-income and desegregated housing opportunities for members of the plaintiff class;

Now, therefore, IT IS HEREBY ORDERED:

1. The previously designated HRA shall be expanded to include the area of the City of Chicago bounded by Lake Street on the North, Washington Boulevard on the South, Hermitage Avenue on the East and Damen Avenue on the West;
2. The Receiver, previously appointed by the Court to develop family public housing on behalf of the defendant, Chicago Housing Authority, shall be free to develop within the expanded HRA 271 units of public housing, provided, however, that additional non-public housing units are constructed within the expanded HRA such that public housing units constitute no more than 35.5% of the total number of units to be constructed, that in each phase of construction this ratio of public to non-public housing units is maintained, that the public housing units are and remain well distributed throughout the expanded HRA and within buildings, and that at plaintiffs' request, the defendant shall provide or cause to be provided to plaintiffs annual written reports on the location of public housing units, including sufficient information to assess whether such units continue to be broadly dispersed throughout the expanded HRA and within buildings;
3. Notwithstanding any previous order in this cause and Paragraph 2 of this Order, the number of public housing units within the previously designated HRA may be reduced so long as an equal number of public housing units in addition to the 271 public housing units described above is provided within the expanded HRA, very low income public housing units are replaced with very low income public housing units, low income public housing units are replaced with low income public housing units, and public housing residents are not involuntarily relocated as part of this effort;
4. Within the HRA the Receiver shall be free to provide public housing units above the third floor for families with children as it deems consistent with achieving the purposes of the Gautreaux order, except that no such units shall be provided until plaintiffs approve in writing the initial location and configuration of such units, and except that in elevator buildings with family public housing units above the third floor such units shall comprise no more than 35.5% of the total number of residential units; and
5. Plaintiffs shall be free to allocate up to \$12 million of the "set-aside" available to them under the Consent Decree approved by this Court in 66 C 1460 to aid in implementing paragraph (2) of this Order.

ENTER:



Judge

December 12, 2002

EXHIBIT E

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DOROTHY GAUTREAUX, et al.	)	
	)	
Plaintiffs,	)	
	)	No. 66 C 1459
v.	)	Judge Marvin E. Aspen
	)	
CHICAGO HOUSING AUTHORITY,	)	
	)	
Defendant.	)	

AGREED ORDER

This matter coming to be heard on the Joint Motion of Plaintiffs and Defendant Chicago Housing Authority, for 1) an order to waive Gautreaux locational restrictions and authorize the development of 83 new non-elderly public housing units in several mixed-income developments to be located in an area bounded by 40th Street to the north, Root Street to the south, State Street to the east, and the railroad embankment west of Federal Street to the west, on a site previously occupied by CHA's Robert Taylor public housing development, and 2) to amend the Tenant Assignment Plan to require that the 83 public housing units that are the subject of this motion be made available to eligible families relocating under CHA's Plan for Transformation; and

The Court having heard from the Parties concerning the proposed order, including that the Receiver, Daniel Levin and The Habitat Company LLC support the Joint Motion; and

The Court being cognizant that the principal remedial purpose of the orders previously entered in this case has been to provide Plaintiff class families with desegregated housing opportunities; and

The Court having retained jurisdiction to issue orders in this case "designed . . . to achieve results consistent with [the Judgment Order]," 304 F. Supp. 736, 741 (N.D.Ill. 1969); and

The Court being of the view that based on the representations of the Parties and the Receiver, the proposed 83 public housing units are designed to achieve results consistent with the Judgment Order previously entered in this case;

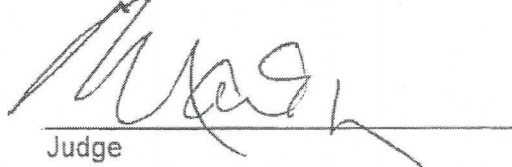
Now, therefore, IT IS HEREBY ORDERED:

(A) The Receiver, previously appointed by the Court to develop new non-elderly public housing on behalf of the Defendant, Chicago Housing Authority, shall be free to develop or cause to be developed 83 units of public housing in mixed-income buildings on the site previously occupied by CHA's Robert Taylor public housing development provided, however, that (1) the planned 68 affordable and 30 market-rate rental units in the buildings that are the subject of this motion are built and marketed roughly simultaneously with the development of the 83 public housing units to be authorized pursuant to this motion, and the 57 for-sale units (not including the 16 homeownership units to be built once the city relocates the Fire Station currently located within the development area), planned for the immediate area are marketed roughly simultaneously with such development and (2) the public housing units are and remain well-distributed among the non-public housing units across the developments that are the subject of this motion.

(B) The Chicago Housing Authority Tenant Assignment Plan, originally approved by the Order of this Court on November 24, 1969, and amended by further orders dated September 12, 1983, June 9, 1989, October 1, 1990, October 6, 1994, August 14, 1995,

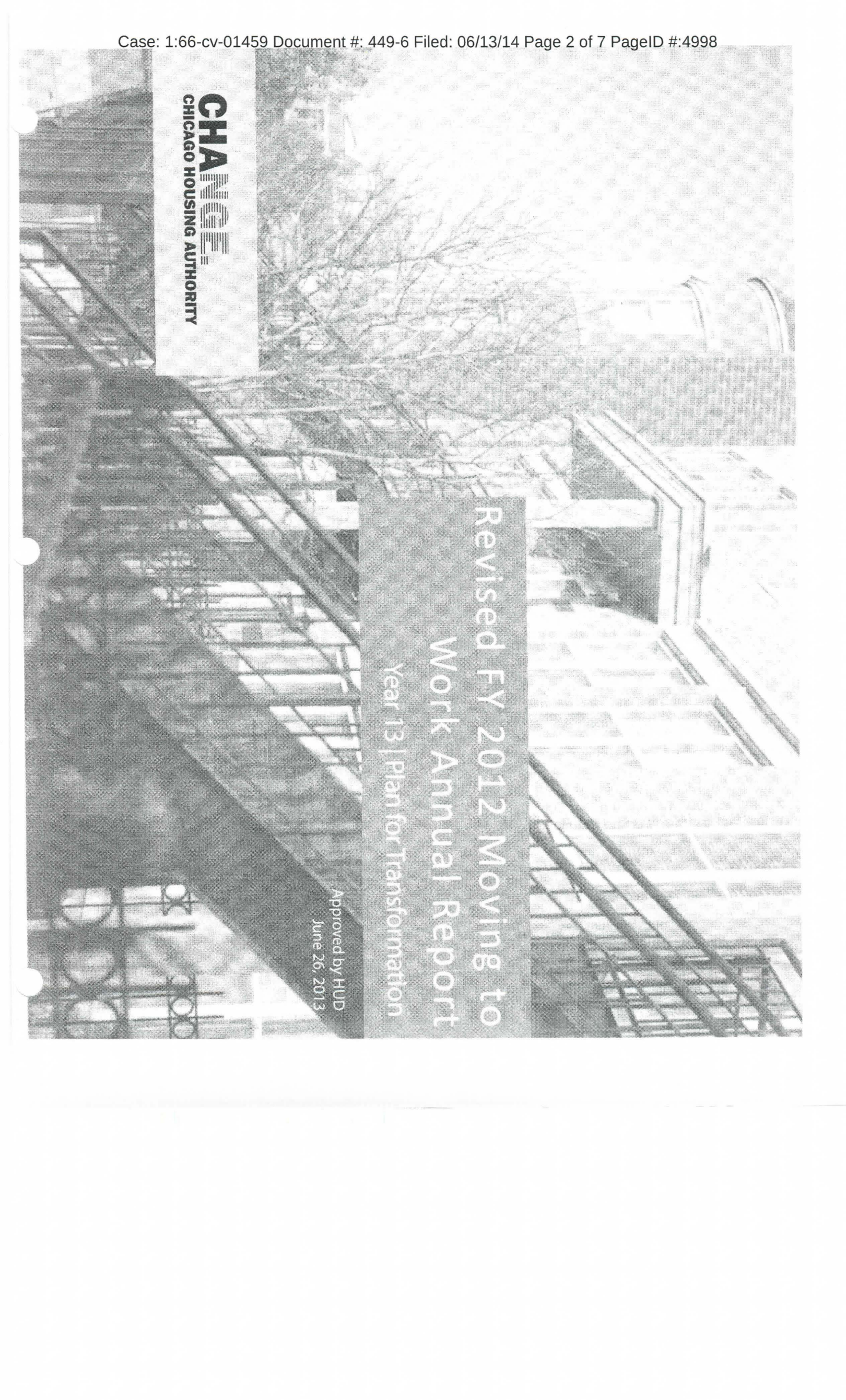
July 20, 2001, August 29, 2002, March 24, 2003, August 5, 2003, December 16, 2003, March 30, 2004, and November 22, 2005 is hereby amended to require that the 83 public housing units that are the subject of this Order be made available to eligible families relocating under CHA's Plan for Transformation.

ENTER:


Judge

Dated: 4/17/06

EXHIBIT F



CHA
CHICAGO HOUSING AUTHORITY

Revised FY 2012 Moving to
Work Annual Report
Year 13 | Plan for Transformation

Approved by HUD
June 26, 2013

APPENDICES

CHANGE.
CHICAGO HOUSING AUTHORITY

Appendix 1: Overall Unit Delivery Progress toward 25,000 Goal through FY2012

Plan for Transformation Unit Delivery by Year through FY2012																
AMP	Development Name	Actual Units Delivered												FY2012 Actual Delivery	FY2012 Annual Plan Goals	Total Units Delivered through FY2012
		FY2000 and Before	FY2001	FY2002	FY2003	FY2004	FY2005	FY2006	FY2007	FY2008	FY2009	FY2010	FY2011			
Mixed-Income Replacement Housing																
IL002001000	ABLA Homes	330	0	0	0	0	117	8	0	120	0	0	0	0	0	575
IL002001000	Brooks Homes	330	-	-	-	-	-	-	-	-	-	-	-	-	-	330
IL002116000	Roosevelt Square Phase I	-	-	-	-	-	117	8	-	-	-	-	-	-	-	125
IL002133000	Roosevelt Square Phase II	-	-	-	-	-	-	-	-	120	-	-	-	-	-	120
IL002089000	Frances Cabrini Extension North	44	32	53	57	20	70	0	22	35	62	0	16	23	23	434
IL002027000	Mohawk North	16	-	-	-	-	-	-	-	-	-	-	-	-	-	16
IL002028000	North Town Village I	28	11	-	-	-	-	-	-	-	-	-	-	-	-	39
IL002109000	North Town Village II	-	16	24	-	-	-	-	-	-	-	-	-	-	-	40
IL002097000	Mohawk Partners	-	5	-	-	-	-	-	-	-	-	-	-	-	-	5
IL002098000	Renaissance North	-	-	-	18	-	-	-	-	-	-	-	-	-	-	18
IL002088000	Old Town Square	-	-	16	-	-	-	-	-	-	-	-	-	-	-	16
IL002090000	Orchard Park	-	-	13	-	-	-	-	-	-	-	-	-	-	-	13
IL002102000	Old Town Village East I	-	-	-	7	4	1	-	-	-	-	-	-	-	-	12
IL002102000	Old Town Village East II	-	-	-	4	4	8	-	-	-	-	-	-	-	-	16
IL002104000	Old Town Village West	-	-	-	12	12	14	-	-	-	-	-	-	-	-	38
IL002101000	Domain Lofts	-	-	-	16	-	-	-	-	-	-	-	-	-	-	16
IL002118000	River Village North	-	-	-	-	-	25	-	-	-	-	-	-	-	-	25
IL002136000	River Village South	-	-	-	-	-	18	-	-	-	-	-	-	-	-	18
IL002129000	River Village Pointe (864 N. Larrabee, site G)	-	-	-	-	-	-	-	12	-	-	-	-	-	-	12
IL002123000	The Larrabee (865 N. Larrabee)	-	-	-	-	-	4	-	-	-	-	-	-	-	-	4
IL002126000	Parkside of Old Town Phase 1A-Condo	-	-	-	-	-	-	-	10	35	27	-	-	-	-	72
IL002131000	Parkside of Old Town Phase 1B-Rental	-	-	-	-	-	-	-	-	-	35	-	-	-	-	35
IL002147000	Parkside of Old Town Phase 2A-Rental	-	-	-	-	-	-	-	-	-	-	-	16	23	23	39
IL002030000	William Green Homes/1230 N. Burling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IL002089000	Frances Cabrini Extension South	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IL002093000	Governor Henry Horner Homes	552	0	0	8	79	0	34	12	58	11	35	0	0	0	789
IL002093000	Horner Phase 1 and Annex	552	-	-	-	-	-	-	-	-	-	-	-	-	-	552
IL002019000	Westhaven IIa1	-	-	-	8	79	-	-	-	-	-	-	-	-	-	87
IL002121000	Westhaven IIa2 Mid-rise	-	-	-	-	-	-	34	-	-	-	-	-	-	-	34
IL002132000	Westhaven Phase IIB Rental	-	-	-	-	-	-	-	12	58	-	-	-	-	-	70
IL002141000	Westhaven Phase IIC- Rental	-	-	-	-	-	-	-	-	-	11	35	-	-	-	46
IL002016000	Harold Ickes Homes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
-	Lakefront Replacement Housing	90	16	0	15	62	16	15	2	13	0	0	0	0	0	229
IL002033000	Completed Scattered Sites-SE (N. Kenwood/Oakland)	56	-	-	-	-	-	-	-	-	-	-	-	-	-	56
IL002032000	Lakefront Program 194 - W. Ridge/Rogers Park (SS-NE)	34	4	-	-	-	-	-	-	-	-	-	-	-	-	38
IL002033000	Shakespeare (SS-SE)	-	12	-	-	-	-	-	-	-	-	-	-	-	-	12
IL002033000	Hutchinson Row (SS-SE)	-	-	-	15	2	3	-	-	-	-	-	-	-	-	20
IL002119000	Jazz on the Boulevard	-	-	-	-	-	13	15	2	-	-	-	-	-	-	30
IL002105000	Lake Park Crescent Phase 1	-	-	-	-	60	-	-	-	-	-	-	-	-	-	60
IL002140000	Lake Park Crescent For Sale Phase 1	-	-	-	-	-	-	-	-	13	-	-	-	-	-	13

Plan for Transformation Unit Delivery by Year through FY2012 (continued)																
AMP	Development Name	Actual Units Delivered												FY2012 Actual Delivery	FY2012 Annual Plan Goals	Total Units Delivered through FY2012
		FY2000 and Before	FY2001	FY2002	FY2003	FY2004	FY2005	FY2006	FY2007	FY2008	FY2009	FY2010	FY2011			
IL002022000	Lathrop Homes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
-	Lawndale Complex Redevelopment	0	0	0	0	0	0	0	0	0	0	0	31	29	32	60
IL002149000	Park Douglas (Phase 1 Rental)	-	-	-	-	-	-	-	-	-	-	0	31	29	32	60
IL002024000	LeClaire Courts Extension	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IL002017000	Madden Park/Ida B. Wells Homes and Extension/Clarence Darrow Homes	0	0	0	0	11	52	63	0	31	50	29	59	0	0	295
IL002113000	Oakwood Shores (Phase 1A)	-	-	-	-	11	52	-	-	-	-	-	-	-	-	63
IL002130000	Oakwood Shores (Phase 1B)	-	-	-	-	-	-	63	-	-	-	-	-	-	-	63
IL002137000	Oakwood Shores (Phase 2A) Rental	-	-	-	-	-	-	-	-	31	50	-	-	-	-	81
IL002145000	Oakwood Shores Phase 2B (One)	-	-	-	-	-	-	-	-	-	-	29	0	-	0	29
IL002155000	Oakwood Shores Senior 202 Phase I (Senior Bldg 1)	-	-	-	-	-	-	-	-	-	-	-	59	-	0	59
-	Rockwell Gardens Redevelopment	0	0	0	0	16	4	32	25	0	0	0	65	0	0	142
IL002112000	Archer Courts	-	-	-	-	-	4	-	-	-	-	-	-	-	-	4
IL002106000	1 South Leavitt	-	-	-	-	2	-	-	-	-	-	-	-	-	-	2
IL002107000	West End Phase IA (off-site)	-	-	-	-	14	-	-	-	-	-	-	-	-	-	14
IL002120000	Jackson Square at West End Phase IB	-	-	-	-	-	-	32	25	-	-	-	-	-	-	57
IL002148000	West End Phase II	-	-	-	-	-	-	-	-	-	-	-	65	-	-	65
-	Stateway Gardens Redevelopment	0	0	0	0	0	27	0	22	24	8	0	0	46	46	127
IL002115000	The Pershing Phase IA (offsite)	-	-	-	-	-	27	-	-	-	-	-	-	-	-	27
IL002125000	Park Boulevard Phase IB (on-site)	-	-	-	-	-	-	-	22	24	8	-	-	-	-	54
IL002159000	Park Boulevard Phase IIA	-	-	-	-	-	-	-	-	-	-	-	-	46	46	46
-	Robert Taylor Homes Redevelopment	29	27	0	0	0	54	0	83	33	19	53	7	0	0	305
IL002021000	Langston	29	-	-	-	-	-	-	-	-	-	-	-	-	-	29
IL002020000	Quincy	-	27	-	-	-	-	-	-	-	-	-	-	-	-	27
IL002117000	Mahalia Place (Legends South C-1)	-	-	-	-	-	54	-	-	-	-	-	-	-	-	54
IL002127000	Hansberry Square (Legends South A-1)	-	-	-	-	-	-	-	83	-	-	-	-	-	-	83
IL002139000	Coleman Place (Legends South C-2)	-	-	-	-	-	-	-	-	33	19	-	-	-	-	52
IL002146000	Savoy Square (Legends South A-2)	-	-	-	-	-	-	-	-	-	-	53	7	-	-	60
-	Washington Park Homes Redevelopment	0	0	0	0	0	6	0	46	0	0	0	0	0	0	52
IL002108000	Washington Park St. Edmund's Meadows	-	-	-	-	-	6	-	8	-	-	-	-	-	-	14
IL002122000	Keystone Place (Outside N. Kenwood/Oakland)	-	-	-	-	-	-	-	38	-	-	-	-	-	-	38
-	Hilliard Towers Apartments	0	0	0	94	59	0	152	0	0	0	0	0	0	0	305
IL002099000	Hilliard Towers Apartments Phase 1 (Family)	-	-	-	-	59	-	-	-	-	-	-	-	-	-	59
IL002134000	Hilliard Towers Apartments Phase 1 (Senior)	-	-	-	94	-	-	-	-	-	-	-	-	-	-	94
IL002100000	Hilliard Towers Apartments Phase 2 (Senior)	-	-	-	-	-	-	94	-	-	-	-	-	-	-	94
IL002135000	Hilliard Towers Apartments Phase 2 (Family)	-	-	-	-	-	-	58	-	-	-	-	-	-	-	58
IL002124000	Fountainview	0	0	0	0	0	0	0	0	14	0	0	0	0	0	14
TOTAL: Mixed-Income Replacement Housing		1,045	75	53	174	247	346	304	212	328	150	117	178	98	101	3,327

Plan for Transformation Unit Delivery by Year through FY2011 (continued)																
AMP	Development Name	Actual Units Delivered												FY2012 Actual Delivery	FY2012 Annual Plan Goals	Total Units Delivered through FY2012
		FY2000 and Before	FY2001	FY2002	FY2003	FY2004	FY2005	FY2006	FY2007	FY2008	FY2009	FY2010	FY2011			
Senior Designated Housing Rehabilitation																
-	Phases I-IV	0	1,026	3,489	2,911	1,166	206	0	0	0	0	0	0	0	0	8,798
IL002073000	Phase V: Larrabee	0	0	0	0	0	0	0	0	61	22	0	0	0	0	83
-	Phase VI: Flannery, Britton Budd	0	0	0	0	0	0	0	100	25	172	0	0	0	0	297
IL002044000	Flannery	-	-	-	-	-	-	-	100	25	-	-	-	-	-	125
IL002144000	Britton Budd (rehabilitated)	-	-	-	-	-	-	-	-	-	172	-	-	-	-	172
-	Phase VII: Kenmore, Pomeroy	0	0	0	0	0	0	0	0	0	0	99	104	0	0	203
IL002151000	Kenmore Apartments (rehabilitated)	-	-	-	-	-	-	-	-	-	-	99	-	-	-	99
IL002152000	Ralph J. Pomeroy Apartments (rehabilitated)	-	-	-	-	-	-	-	-	-	-	0	104	-	-	104
TOTAL: Senior Designated Housing Rehabilitation		0	1,026	3,489	2,911	1,166	206	0	100	86	194	99	104	0	0	9,381
Scattered Site Housing Rehabilitation																
-	Scattered Sites (Total)	0	606	1,163	654	77	36	7	0	0	0	12	12	14	14	2,581
IL002031000	North Central	-	184	654	311	19	5	1	-	-	-	-	-	-	-	1,174
IL002032000	Northeast	-	159	267	113	6	2	-	-	-	-	-	-	-	-	547
IL002033000	Southeast	-	187	114	42	1	6	5	-	-	-	12	12	14	-	393
-	Wentworth Annex	-	-	-	-	-	-	-	-	-	-	12	12	14	14	38
IL002034000	Southwest	-	46	110	79	9	2	1	-	-	-	-	-	-	-	247
IL002035000	West (includes Cabrini-Lincoln)	-	30	18	109	42	21	-	-	-	-	-	-	-	-	220
TOTAL: Scattered Site Housing Rehabilitation		0	606	1,163	654	77	36	7	0	0	0	12	12	14	14	2,581
Family Housing Rehabilitation																
-	Altgeld Gardens	0	0	0	0	0	101	286	0	128	254	240	0	0	0	1,009
IL002002000	Altgeld Gardens I (Blocks 1-7)	-	-	-	-	-	101	286	-	128	254	-	-	-	-	769
IL002002100	Altgeld Gardens II (Blocks 8-13)	-	-	-	-	-	-	-	-	-	-	240	-	-	-	240
IL002023000	Phillip Murray Homes (Blocks 15-17)	0	0	0	0	0	0	0	314	0	0	0	0	0	0	314
IL002003000	Bridgeport Homes	0	0	0	15	10	0	35	32	19	0	-	0	0	0	111
IL002013000	Dearborn Homes	0	0	0	0	0	0	0	78	124	42	294	130	0	-	668
IL002091000	Frances Cabrini Rowhouses	0	0	0	0	0	0	0	0	0	146	0	0	0	0	146
IL002018100	Lake Parc Place	0	0	0	21	279	0	0	0	0	0	-	0	0	0	300
IL002095000	Lawndale Gardens	0	0	0	0	0	0	0	47	15	63	-	0	0	0	125
IL002025000	Lowden Homes	0	0	0	5	49	39	34	0	0	0	-	0	0	0	127
IL002038000	Trumbull Park Homes	0	0	0	0	27	162	245	0	0	0	-	0	0	0	434
IL002039000	Washington Park Low-Rises	0	0	0	0	45	32	65	11	64	26	89	0	0	0	332
IL002040000	Wentworth Gardens	0	0	0	0	0	130	127	86	0	0	-	0	0	0	343
TOTAL: Family Housing Rehabilitation		0	0	0	41	410	464	792	568	350	531	623	130	0	0	3,909

Plan for Transformation Unit Delivery by Year through FY2012 (continued)																	
AMP	Development Name	Actual Units Delivered												FY2012 Actual Delivery	FY2012 Annual Plan Goals	Total Units Delivered through FY2012	
		FY2000 and Before	FY2001	FY2002	FY2003	FY2004	FY2005	FY2006	FY2007	FY2008	FY2009	FY2010	FY2011				
Property Investment Initiative																	
IL0021570001																	
IL0021580001	Property Investment Initiative	0	0	0	0	0	0	0	0	0	0	0	6	8	9	85	23
Project-Based Vouchers/Property Rental Assistance Program																	
Project-Based Vouchers prior to FY2010		-	-	-	-	-	-	-	-	-	-	-	1,390	-	-	-	1,390
Property Rental Assistance Program		-	-	-	-	-	-	-	-	-	-	-	229	484	52	645	765
TOTAL: Project-Based Vouchers/Property Rental Assistance Program		-	-	-	-	-	-	-	-	-	-	-	1,619	484	52	645	2,155
GRAND TOTALS																	
TOTAL NUMBER OF HOUSING UNITS		1,045	1,707	4,705	3,780	1,900	1,052	1,103	880	764	875	2,476	916	173	845	21,376	
CUMULATIVE TOTAL NUMBER OF HOUSING UNITS		1,045	2,752	7,457	11,237	13,137	14,189	15,292	16,172	16,936	17,811	20,287	21,203	21,376	-	21,376	
PERCENTAGE OF 25,000		4%	11%	30%	45%	53%	57%	61%	65%	68%	71%	81%	85%	86%	-	86%	

EXHIBIT G

**MINUTES OF THE REGULAR MEETING
OF THE
COMMISSIONERS OF THE CHICAGO HOUSING AUTHORITY**

February 18, 2014

The Commissioners of the Chicago Housing Authority held its Regular Meeting of the Board of Commissioners on Tuesday, February 18, 2014 at approximately 8:45 a.m. at the Charles Hayes Family Investment Center located at 4859 S. Wabash in Chicago, IL.

In the absence of Chairwoman Z. Scott, Vice Chairman Rodrigo Sierra called the meeting to order and upon roll call, those present and absent were as follows:

Present:	Rodrigo Sierra
	Mark Cozzi
	Dr. Mildred Harris
	Harriet Johnson
	Myra King
	Jack Markowski

Absent:	Matthew Brewer
	Z. Scott
	Bridget Reidy

Also present were Amy Degnan, Chief of Staff; Scott Ammarell, Chief Legal Officer; Chicago Housing Authority Staff Members and the General Public.

There being a quorum present, the meeting duly convened and business was transacted as follows:

Upon Motion made by Acting Chairman Sierra and properly seconded by Commissioner Markowski, the Commissioners adjourned to Executive Session. Acting Chairman Sierra announced that pursuant to the Open Meetings Act, 5 ILCS 120/2, the Board would adjourn for approximately one hour to discuss personnel related matters, pending, probable or imminent litigation and audit reviews.

The Commissioners subsequently reconvened in Open Session and upon roll call, those present and absent were as follows:

Present:	Rodrigo Sierra
	Mark Cozzi
	Dr. Mildred Harris
	Harriet Johnson
	Myra King
	Jack Markowski

Absent:	Matthew Brewer
	Z. Scott
	Bridget Reidy

There being a quorum present, the meeting duly convened and business was transacted as follows:

After Motion made by Commissioner Markowski and seconded by Commissioner Cozzi, minutes for the Regular and Closed meetings of January 21, 2014 were unanimously approved as submitted.

Chairman Sierra then introduced Item 1 discussed in Closed Meeting and Commissioner Cozzi presented a Motion for approval of Item 1:

of the third and final one-year option, at the discretion of the Chief Executive Officer or his designee, subject to funding availability and satisfactory contract performance, in an amount not-to-exceed \$1,700,000, to provide the Learn and Earn summer youth program. The aggregate total requested for approval of the second and third one-year option periods is an amount not to exceed \$3,400,000. The new aggregate contract total, including the base term, first option year, and final two one-year options will be an amount not-to-exceed amount \$5,441,598.

This award is subject to the Contractor's compliance with the CHA's MBE/WBE/DBE, Section 3 hiring, and insurance requirements.

The Motion to adopt resolution for Item 2 was seconded by Commissioner Johnson and the voting was as follows:

Ayes:	Mark Cozzi Dr. Mildred Harris Harriet Johnson Jack Markowski Myra King Rodrigo Sierra
Nays:	None

There being no questions or discussion, Chairman Sierra thereupon declared said Motion carried and said resolution adopted.

Commissioner Mark Cozzi then presented the report of the Joint Operations and Finance Committee meeting. Per Commissioner Cozzi, since there was not a quorum on Wednesday, February 12, the Joint Operations and Finance Committee meeting was not officially held, however, Commissioners and the public were briefed on the nine items appearing on the agenda, and the items were open to comments and questions from Commissioners and the public, but for the record, no vote was taken.

Commissioner Cozzi then presented an Omnibus Motion for the approval of Items 3 through 11.

(Item 3)

As part of the Capital Improvement Program, Contract No. 0638 was executed between the Chicago Housing Authority and Holabird & Root (H&R) for Prime Design Consultant services at Altgeld Gardens. The resolution for Item 3 approves Modification No. 5 to Contract 0638 to increase the design fees for H&R related to additional Prime Design Consultant Services at Altgeld Gardens and modify the contract to refocus on unit rehabilitation. In 2013, CHA secured an Urban Planner to develop a comprehensive master-site plan and started a robust master planning process. A Preferred Design Concept plan was presented to the residents and community at a September 30, 2013 Town Hall meeting. The Preferred Design Concept includes the rehabilitation of approximately 509 off-line units, renovation and/or new construction of community facilities, new commercial space, a new green boulevard and outdoor recreation spaces. H&R is the Architect of Record for the rehabilitation program at Altgeld-Murray. Currently H&R has two contracts 0638 and 0651; Contract 0638 is for Altgeld and Contract 0651 is for Murray from their previous rehabilitation work prior to the master planning process that will be used to implement the proposed rehabilitation work in the recently developed Preferred Design Concept plan.

RESOLUTION NO. 2014-CHA-16

WHEREAS, the Board of Commissioners has reviewed the Board Letter dated February 12, 2014 entitled, "Authorization to execute Contract Modification No. 05 to Contract No. 0638 with Holabird & Root LLC for the provision of Additional Prime Design Consultant services at Altgeld Gardens."

THEREFORE, BE IT RESOLVED BY THE CHICAGO HOUSING AUTHORITY

THAT, It is recommended that the Board of Commissioners authorize the CEO or his designee to enter a Modification No. 5 to Contract No. 0638 with Holabird and Root LLC., (H&R) for the modification and provision of Additional Prime Design

Consultant Services at Altgeld Gardens and increase the not-to-exceed contract amount by \$213,736.00. The new total contract value of Contract No. 0638 is not-to-exceed \$9,207,755.00.

This award is subject to the Contractor's compliance with the CHA's MBE/WBE/DBE, Section 3 and insurance requirements.

(Item 4)

The resolution for Item 4 approves a Predevelopment Loan Agreement with BMH-I, LLC; amends the Master Development Agreement; commits up to \$750,000 of CHA funds for Pre-development work at the Horner Superblock and approves submission of a Disposition application to HUD. The original Henry Horner (Horner) site was developed between 1957 thru 1969 and was comprised of 1,765 public housing units. The redevelopment of Horner began with Phase I in the late 1990's. The redevelopment of Phase I was comprised of 552 units, of which 260 are scattered site, 90 are at the Annex and 201 are at the Superblock. Phase I was completed in 2000. In 1996 Horner was awarded a HOPE VI grant for \$18.4MM for the redevelopment of Phase II, introducing a true mixed-income/finance community. The HOPE VI plan calls for three major redevelopment phases comprised of 764 mixed income units of which 271 are public housing, 132 are affordable and 361 are market rate units. To date, a total of 547 mixed-income units have been delivered (408 rental and 139 for-sale). Two-hundred thirty-seven are public housing, 109 are affordable and 201 are market rate units. In November 2013, after 3 years of negotiations among CHA, the HRC, BPI, and HUD, including the filing of a motion to allow amendment of the Consent Decree, Judge Zagel signed an Agreed Order for the redevelopment of the Superblock. The Superblock Redevelopment Plan included redevelopment of the existing site from 100% public housing into a mixed-income rental community that will co-exist with the surrounding mixed-income Westhaven Park community. The outcome of the negotiations and surveys has resulted in a mixed-income rental phase comprised of: 95 public housing units; 50 affordable units and 55 market rate units. At least fifty (50) off-line units will be used as a temporary relocation resource for Superblock families who elected to remain on the Superblock after redevelopment. On April 16, 2013, a town hall meeting was held for all Superblock families to explain the terms of the proposed settlement agreement and address any questions and concerns. In addition, smaller community meetings were conducted on April 29, April 30 and May 1, 2013 to discuss the issues and for residents to complete and submit their Housing Preference Sheets.

RESOLUTION NO. 2014-CHA-17

WHEREAS, the Board of Commissioners has reviewed the Board Letter dated February 12, 2014 entitled 1) Enter into a Predevelopment Loan Agreement with BMH-I, LLC; 2) Amend the Master Development Agreement; 3) Commit Chicago Housing Authority Funds up to \$750,000 for pre-development work at the Horner Superblock; 4) Submit a Disposition Application to the United States Department of Housing and Urban Development; and 5) Execute and deliver such other documents and perform such actions as may be necessary or appropriate to implement the foregoing.

THEREFORE, BE IT RESOLVED BY THE CHICAGO HOUSING AUTHORITY

THAT, the Board of Commissioners authorizes the Chief Executive Officer or his designee to 1) Enter into a Predevelopment Loan Agreement with BMH-I, LLC; 2) Amend the Master Development Agreement; 3) Commit Chicago Housing Authority Funds up to \$750,000 for pre-development work at the Horner Superblock; 4) Submit a Disposition Application to the United States Department of Housing and Urban Development; and 5) Execute and deliver such other documents and perform such actions as may be necessary or appropriate to implement the foregoing.

This award is subject to the Contractor's compliance with the CHA's MBE/WBE/DBE, Section 3 and insurance requirements.

(Item 5)

The CHA requires environmental consulting (EC) services for 2014 through 2018 to satisfy CHA's need for environmental compliance requirements for construction, capital maintenance

THAT the Board of Commissioners authorizes the Chief Executive Officer or his designee to enter into a contract with the Center for Economic Progress, which will provide early tax refund loans to up to 500 CHA residents who enroll in the Earned Income Tax Credit pilot in an amount not-to-exceed \$575,000 for the period of March 1, 2014 through June 30, 2015.

The Motion to adopt resolutions for Items 3 through 11 was seconded by Commissioner Markowski and the voting was as follows:

Ayes: Mark Cozzi
Dr. Mildred Harris
Harriet Johnson
Jack Markowski
Myra King
Rodrigo Sierra

Nays: Myra King (on Item 3 only)

There being no questions or discussion, Chairman Sierra thereupon declared said Motion carried and said resolutions adopted.

Amy Degnan, Chief of Staff, then presented the CEO's monthly report.

Chairman Sierra then invited the residents and the public at large to address the Board.

There being no further business to come before the Commissioners, upon Motion made by Commissioner Markowski, seconded by Commissioner Cozzi, the February 18, 2014 meeting of the Board of Commissioners was adjourned.

s/b: Rodrigo Sierra
Acting Chairman, Chicago Housing Authority

s/b: Lee Chuc-Gill, Secretary
Custodian and Keeper of Records

EXHIBIT H



FY2013 Moving to Work Annual Report
Original Submission: March 31, 2014
Approved:



Overview of CHA's MTW Goals and Objectives

Since 2000, CHA has been engaged in achieving the goals of the original Plan for Transformation: rehabilitate or redevelop 25,000 housing units in Chicago; reintegrate low-income families and housing into the larger physical, social and economic fabric of the city; provide opportunities and services to help residents improve their lives; and spur the revitalization of communities once dominated by CHA developments. CHA and HUD signed the original Moving To Work (MTW) Agreement on February 6, 2000 which allowed CHA to implement the original Plan for Transformation. CHA's Amended and Restated MTW Agreement with HUD was fully executed on June 26, 2008 which extended CHA's participation in the MTW Demonstration Program through FY2018.

On April 20, 2013, Mayor Rahm Emanuel and CHA unveiled a new strategic plan, *Plan Forward: Communities that Work*, which outlines the agency's newly articulated mission and strategic goals that will guide CHA's work moving forward. The key goals of Plan Forward include completing the final phase of the original Plan and coordinating public and private investments to develop vibrant communities; ensuring CHA's housing portfolio is safe, decent and sustainable; and expanding targeted services to more residents at critical milestones in their lives. As CHA implements Plan Forward initiatives, the agency will continue to pursue the three statutory objectives of the MTW Demonstration Program:

- **MTW Statutory Objective I:** Increase housing choices for low-income families.
- **MTW Statutory Objective II:** Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
- **MTW Statutory Objective III:** Reduce costs and achieve greater cost effectiveness in federal expenditures.

As part of the MTW Agreement, CHA must submit an annual report to HUD no later than 90 days after the end of the fiscal year. In May 2013, HUD issued a revised Form 50900 (Attachment B to the MTW Agreement) which outlines new requirements for the content of MTW annual plans/reports and for tracking the impact of MTW activities. CHA's FY2013 MTW Annual Report is the first document in which CHA must fully adopt these new reporting requirements. CHA will continue to work with HUD to ensure compliance with the new Form 50900.

The following sections summarize CHA's key MTW goals and initiatives.

Key Plan Forward Initiatives

Throughout FY2013, CHA continued to pursue and/or plan for future implementation of the following Plan Forward initiatives:

CHA Unit Delivery Strategy and Progress toward Goal of 25,000 Housing Units

In order to achieve the 25,000 unit goal of the original Plan, CHA is pursuing a variety of unit delivery strategies.

- CHA continues to move forward with new phases in mixed-income developments which have replaced many former CHA properties.
- CHA also continues to expand the Property Rental Assistance (PRA) Program to bring new project-based vouchers units through multi-year contracts with private owners and developers.
- In FY2013, CHA launched a new Real Estate Acquisition Program (REAP) as a strategy for acquisition of public housing units primarily in CHA-designated opportunity areas.

- In addition, CHA released a Request for Qualifications (RFQ) in July 2013 to solicit a pool of developers interested in partnering with CHA, and 24 initial prequalified development teams were approved by CHA's Board in December 2013.
- As part of Plan Forward, CHA is exploring additional local housing programs to provide more units toward the 25,000 goal. CHA will propose these programs for HUD approval through annual plans/amendments, as required, and will also request HUD approval to count housing toward the overall 25,000 unit goal.

During FY2013, CHA continued to make progress toward the original Plan for Transformation goal of rehabilitating or replacing 25,000 units of affordable housing in Chicago. In FY2013, CHA delivered 298 housing units through mixed-income redevelopment, public housing acquisition and new project-based voucher units through the PRA program. As of the end of FY2013, CHA has completed 21,649 housing units or 87% of the overall unit delivery goal for the Plan.¹ (Please refer to Section II and IV for more information.)

FY2013 Overall Unit Delivery

IL Number	Type/Program	Development	Projected FY2013 Unit Delivery	Actual FY2013 Unit Delivery
IL002153000	Mixed-Income Family Housing Redevelopment	Oakwood Shores 2C	19	19
IL002128000		Lakefront II Rental	47	47
IL002114000		Oakwood Shores 2D	22	22
IL002157000	Public Housing Acquisition	Property Investment Initiative	7	7
TBD		Real Estate Acquisition Program (REAP)*	250	0
N/A	Project-Based Vouchers	Property Rental Assistance Program	180	203
Total Housing Units			525	298
*REAP includes 2013 annual plan projections for Multi-Family Acquisition Initiative and Housing for Chicagoans Everywhere, which are no longer applicable as separate initiatives.				

Uniform Housing Policy

Like most housing authorities, CHA administers two primary housing subsidy programs: the Public Housing and Housing Choice Voucher programs. While the programs are similar in several key aspects, the specific policies have evolved over time and differ in areas that lead to administrative inefficiencies and participant confusion. Another element of Plan Forward is to address these issues by creating a Uniform Housing Policy to establish a more consistent set of rules for all CHA-assisted housing. The Uniform Housing Policy will align housing policies to streamline and clarify program administration. It will unify the rules for the two housing programs to make them more user-friendly and efficient to manage by having a single set of requirements, standards, and

¹ CHA's progress toward the 25,000 unit delivery goal is not the same as the total number of CHA public housing units, or the number of online public housing units. Public housing units renovated or redeveloped through the Plan ten to twelve years ago, though counted toward unit delivery progress, may now temporarily be offline for capital maintenance. Moreover, project-based vouchers (PBVs) administered through CHA's PRA Program are not CHA ACC/public housing units, but do provide needed affordable housing opportunities and are counted toward the overall goal of 25,000 revitalized housing units.

processes. CHA will implement the Uniform Housing Policy through a multi-phased approach. This implementation strategy will prioritize policies that benefit participants and enhance consistency across programs in FY2014. New policies that require more discussion and analysis will be adopted in subsequent years.

Throughout FY2013, CHA has continued internal analysis and planning for the adoption of the Uniform Housing Policy as well as outlining strategies for resident and stakeholder communication. Beginning in FY2014, CHA plans to move forward with several policies that require MTW authority, including expanding biennial recertification to public housing, adopting triennial recertification for households with only senior/disabled participants, simplifying asset verification, and modifying "Choose to Own" homeownership and Family Self Sufficiency program requirements. In addition, CHA plans to implement additional policies related to HCV unit inspection owner participation, clarification of waitlist priorities and income requirements across housing programs, clarification of definitions of absent participants, guests and unauthorized members, standardization of utility allowance schedules and adoption of smoke-free housing policies for all new properties. CHA plans to release Uniform Housing Policy documents for public housing and HCV programs for public comment and HUD approval in order to implement these policies in FY2014.

Rental Assistance Demonstration (RAD) Program

In October 2013, CHA submitted a portfolio application to HUD to utilize RAD for approximately 64 public housing properties with 10,935 units over the next two years (2014-2015). CHA plans to utilize RAD to refinance some properties and to support new initiatives that will expand affordable housing opportunities. More than 40 stakeholder, resident and community meetings were held prior to the application to educate people about the benefits of RAD and how it can be used to support long-term affordability.

After the RAD portfolio application was submitted, CHA learned that the 60,000 unit maximum currently available for RAD had already been reached through applications received by HUD. In FY2014, CHA will continue the internal planning process for RAD in the event that the number of units available for the program is increased, or if any of the earlier applications do not move forward. CHA will pursue a FY2014 Annual Plan Amendment, including public comment, as required, upon receipt of any RAD approval by HUD.

Housing Programs to Support Local Preferences

As part of Plan Forward, CHA has explored alternative housing programs, including potential non-traditional subsidy programs, to support local initiatives and needs. After careful consideration, CHA has determined it will not pursue non-traditional subsidy programs. However CHA continues to explore strategies and program parameters that will contribute to Chicago's Plan to End Homelessness 2.0, HUD's Designated Opportunities to End Homelessness and other local initiatives. CHA will propose specific initiatives, including any requiring the use of MTW flexibility, for HUD approval through a FY2014 Annual Plan Amendment or subsequent annual plan. As referenced earlier in this section, CHA may also seek HUD approval to count such housing toward the 25,000 unit goal.

New Service Model

CHA has developed a new service model in line with *Plan Forward: Communities that Work*. The new model will provide services to more residents, including some HCV residents, and will better tailor services to needs with a focus on adult education and employment, youth and clinical services. CHA will fully transition to the new model in FY2014, which includes:

EXHIBIT I

Approved FY2014 Moving to Work Annual Plan



Original Submission: October 18, 2013

Approved: March 21, 2014



Section II: General Housing Authority Operating Information

Section II: General Housing Authority Operating Information

This section contains General Housing Authority Operating Information, including anticipated changes to CHA's housing stock and planned leasing and wait list activity for the public housing portfolio and Housing Choice Voucher Program in FY2014.

Overall Plan for Transformation Unit Delivery Progress

Throughout FY2014, CHA will continue to revitalize its affordable housing stock and to create new housing opportunities for low-income families in Chicago toward completing the 25,000 housing unit goal of the original Plan for Transformation. By the end of FY2014, CHA anticipates an additional 563 units toward the overall unit delivery progress, which will bring the total to 22,307 housing units or 89% of the 25,000 goal. This includes new housing opportunities through redevelopment in mixed-income communities; acquisition of public housing units; and project-based voucher units added through the Property Rental Assistance Program.

Planned FY2014 Overall Unit Delivery

IL Number	Type	Development/Program	Projected FY2014 Unit Delivery
IL002162000	Mixed-Income Redevelopment (Public Housing)	Dorchester Artist Housing	12
IL002161000		Shops and Lofts	28
IL0021570001 IL0021580001	Public Housing Acquisition	Property Investment Initiative	7
TBD		Real Estate Acquisition Program	220
N/A	Project-Based Vouchers	Property Rental Assistance Program	296
Total Planned FY2014 Unit Delivery			563

Housing Stock Information: Public Housing**Number of Public Housing Units at the Beginning of FY2014**

As of 3rd quarter 2013, CHA currently has 21,189 public housing units including those offline and unavailable for occupancy.¹ This number includes all standing public housing units and is not the same as CHA's progress toward the 25,000 unit delivery goal. CHA public housing units are categorized in two ways:

- **Online/Leasable Units:** 18,303 units - All occupied units plus those that are vacant but available for occupancy/leasing. CHA's vacancy rate is calculated based on online, leasable units.
- **Offline Units:** 2,886 units - Units unavailable for occupancy and offline for HUD-approved reasons such as pending demolition/disposition, ADA modification, routine or major capital maintenance, non-dwelling use, on-site employee use, relocation resources, and pending redevelopment.

¹ CHA's progress toward the 25,000 unit delivery goal is not the same as the total number of CHA public housing units, or the number of online public housing units. Public housing units renovated or redeveloped through the Plan ten to twelve years ago, though counted toward unit delivery progress, may now temporarily be offline for reasons described in this section. Moreover, project-based vouchers (PBVs) administered through CHA's PRA Program are not CHA ACC/public housing units, but do provide needed affordable housing opportunities and are counted toward the overall goal of 25,000 revitalized housing units.

Section II: General Housing Authority Operating Information

CHA Public Housing/ACC Units as September 30, 2013

	Total Units	Explanation
Online/Leasable Units	18,303	Includes occupied and vacant units. CHA's vacancy rate is calculated based on online units.
Occupied Units	17,970	Includes online units which are currently occupied/leased.
Vacant Units	333	Includes online units which are currently vacant and available for occupancy.
Offline Units	2,886	Includes units offline and unavailable for occupancy for HUD-approved reasons described below.
Total Public Housing (ACC) Units*	21,189	Includes all standing public housing units (offline and online) which CHA owns and is responsible for.

*Does not include 339 units at city/state PBV sites (Lathrop Elderly, Harrison Courts, and Loomis Courts) which are not public housing units.

Offline Unit Summary

A total of 2,886 public housing units in CHA's portfolio are currently offline and unavailable for HUD-approved reasons, including:

- Pending Redevelopment/Planning: Includes sites with redevelopment planning underway; specific timelines for bringing new units online are pending finalization of plans.
- Major or Routine Capital Maintenance: Includes sites undergoing routine repairs or maintenance, updates to align with building requirements, ADA modifications and major capital maintenance projects.
- Pending Demolition or Disposition Activity: Units currently pending demolition or disposition; these units will not come back online.
- Non-Dwelling Use: Includes units used for service provider offices, property management offices and on-site employees.

The following table shows the number of offline units by category as of 3rd quarter 2013. (Please refer to p. 33 for information on CHA's long term plan for offline units.)

CHA Offline Unit Summary as of September 2013

Category	Total Units	% of Offline Units
Pending Redevelopment/Planning	2,101	72.8%
Major or Routine Capital Maintenance	475	16.5%
Pending Demolition/Disposition Activity	41	1.4%
Non-Dwelling Units	269	9.3%
Total Offline Units	2,886	100%

More information on the status of offline units is available and updated quarterly on CHA's website (www.thecha.org).

EXHIBIT J

**INSIDE THIS ISSUE**

- Targeting the most vulnerable families with intensive services for parents and children will help strengthen the community overall.
- Both the Chicago and Portland HOST sites are struggling with high crime and social disorder.
- How HOST addresses the issue of high stress and anxiety in these vulnerable communities.

HOST: Helping Families, Building Community

Chantal Hailey and Priya Saxena

The Housing Opportunity and Services Together (HOST) Demonstration is a place-based initiative that seeks to improve outcomes for the most vulnerable residents in public and mixed-income housing developments (see page 8). Public housing communities are among the most disadvantaged in the nation, suffering all the ills of concentrated poverty and chronic disadvantage. HOST is currently under way in four communities. The first two HOST sites, in Chicago and Portland, are very different. Chicago's Altgeld Gardens (see image 1) is a very large traditional public housing development, racially and economically segregated with high levels of crime and disorder. Portland's New Columbia and Humboldt Gardens are both new, mixed-income communities housing former public housing residents alongside market rate tenants and homeowners (see image 2; Scott et al. 2013). The HOST framework posits that targeting the most vulnerable families with intensive services for parents and children will help strengthen the community overall—and ultimately reduce costs to the housing authorities and other public systems (Popkin and McDaniel 2013).

Both sites provide a rich environment to test the HOST framework as a strategy for supporting families and their communities. In Chicago, the housing authority has made large investments in rehabilitating Altgeld's units, controlling crime, and, to the extent feasible, improving services and amenities in what is now its largest family public housing development—the hope is that HOST will help sustain these investments and help build community. In Portland, the goal is to capitalize on the large investment in new building, infrastructure, and amenities, as well as to support the already-strong levels of community cohesion.

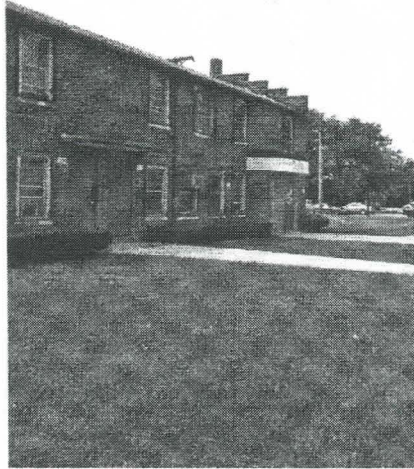
In this brief, we paint a picture of the first two HOST communities, drawing on data from our 2012 survey of adult and youth participants, administered as HOST services were just getting under way at both sites. To better understand the HOST participants' community perceptions, we compare them with adults from the Urban Institute's 2001 Chicago Panel Study of families who lived in a deteriorating Chicago public housing development, Madden/Wells Homes, and the 2007 Chicago Family Case Management Demonstration, a study that provided wrap-around case management services to adults in Chicago's Dearborn and Madden/Wells Homes (Popkin et al. 2002 and 2008).

HOST aims to
reduce community
violence and disorder
through adult and
youth services for
the most troubled
families.

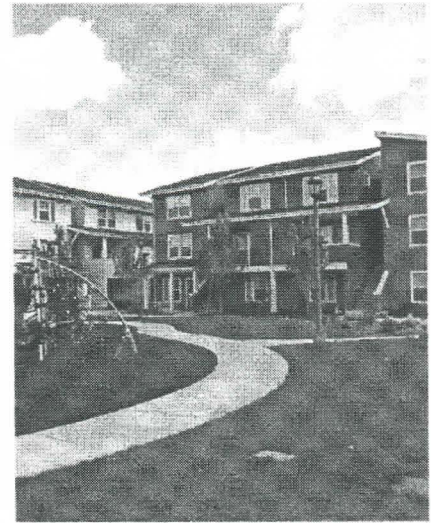
HOST Sites Are in Very Different Communities

The Chicago HOST site, Altgeld Gardens, is the Chicago Housing Authority's (CHA) largest remaining traditional public housing development and is home to approximately 4,000 predominately African-American residents. In 2005, large sections of the Altgeld Gardens homes underwent complete renovation; the CHA updated bathrooms, kitchens, and living spaces, and installed modern lighting fixtures and heating and cooling systems (Chicago Housing Authority 2013). During this rehabilitation, the CHA created a large urban garden, tended to by adult and youth residents, to improve the general livability of the neighborhood (see image 3). Although its buildings and physical environment have substantially improved, the residents of Altgeld Gardens remain in a high-poverty, racially segregated neighborhood (95 percent African American; 58 percent of families report incomes below the poverty level).¹ In addition, this community is extremely isolated, located about 25 miles south of Chicago's Downtown Loop, inaccessible by Chicago's expansive public train system, and similarly distant from employment opportunities and services.

According to focus groups held with residents and UCAN, the HOST service providers, case managers in August 2012, residents have access to only two grocery stores. The grocery store on-site sells mainly liquor and processed foods and the other is difficult to access on foot and sells overpriced, low-quality food. There is a community health center on the property, but case managers report that residents do not like to use it because the center's entrance faces the outside of the property, making residents feel uninvited to use its services. Because of concerns over the continued problems with crime and concentrated poverty, the CHA halted the development's renovations partway through, leaving about one-third of the units vacant and boarded up. The CHA board and resident advocates continue to debate the ulti-



1. UCAN Office in Altgeld Gardens



2. Housing in Humboldt Gardens

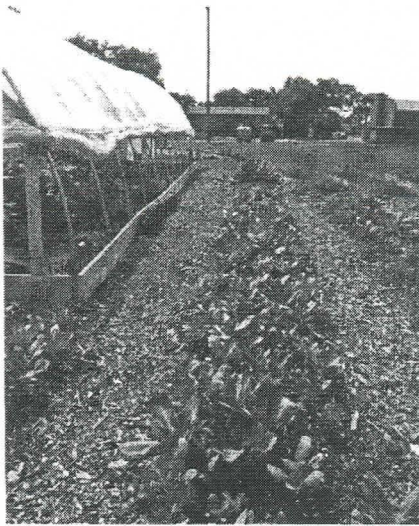
mate future of the development, including whether the CHA will be able to take eminent domain over a space that currently houses a convenience and liquor store to build a new community center (Chicago Housing Authority 2013).

Portland's HOST intervention is split between two Home Forward (the Housing Authority of Portland) sites: Humboldt Gardens, the largest HOPE VI mixed-income development in Portland, and New Columbia, also a HOPE VI site and an adjacent public housing property, Tamarack Apartments. Portland's HOST sites differ from Altgeld in many key ways. Most notably, Portland's sites have unusual racial and ethnic diversity—one-half of residents are native-born African Americans and Caucasians, one in six are Latin American immigrants, 11 percent are African immigrants, and the remaining 22 percent are European immigrants and native-born Latinos, Asians, and others. In 2001, Home Forward dedicated over \$120 million to revitalize the New Columbia community, including redeveloping the public housing development as new, mixed income apartments and homes, and constructing a new small grocery store, school, and boys and girls club.² In 2005, Home Forward also used HOPE VI funding to

redevelop Humboldt Gardens into an affordable public housing development within its revitalizing North Portland neighborhood (Home Forward 2013). Both Portland sites are physically attractive and boast a range of amenities, including community centers, parks, bus lines, community gardens, and in New Columbia, a new bike park (see image 4). The Portland HOST sites are also located in racially and economically diverse neighborhoods—about 60 percent of residents are white, 20 percent black, and 15 percent Hispanic or Latino.³ Although less impoverished than Altgeld Gardens, both Portland sites are in moderately poor neighborhoods—about 38 percent of families are under the poverty line. While Portland's sites could not look more different than Altgeld on the surface, they still house a substantial number of poor, vulnerable families (Scott, McDaniel et al. 2013).

HOST Participants Perceive a Lack of Quality Resources in Their Neighborhoods

Our 2012 survey findings indicate that residents in both HOST's Chicago and Portland sites are seeing the benefits of the housing authorities' investments in rehabilitation and



3. Altgeld's Community Garden



4. Beautification in Humboldt Gardens

management. Relatively few report problems with physical disorder—graffiti, trash, and junk (about 7.8 percent of HOST adults)—compared with the Chicago public housing development residents in our Chicago Panel Study and Demonstration described above (about 50 percent). However, both sites report similar levels of problems with neighborhood services. About one-fourth of HOST participants report quality of schools 26 percent in Chicago and 24 percent in Portland, as well as lack of response to crime from police (22 percent, Chicago, and 17 percent, Portland as big problems—figures comparable to Demonstration participants (28 percent and 24 percent, respectively).

The Portland perceptions of local services are surprising given their new on-site community facilities—grocery stores, schools, and public green spaces; however, recent school quality troubles may have disheartened residents. The school that served Humboldt Gardens' youth was closed last year, scattering students to schools throughout the city (Swart 2012).

Although the HOST demonstration does not directly address these community deficiencies, case managers connect families with services to help circumvent these resource

shortages. Tutoring services assist Portland and Chicago children in reaching their academic pursuits and supplement school sources. Additionally, Home Forward through HOST has partnered with the local schools to lead children to academic success. One New Columbia elementary school aims to help students get back on track by offering a year-round continuity of learning for all children and a longer school day for 4th and 5th grades to help its large immigrant and low-income student population with many cultural and language barriers succeed.

HOST Participants Perceive Violence and Social Disorder as Major Community Problems

Like many large public housing properties, Altgeld Gardens has struggled with high rates of crime, drug trafficking, and gang activity. Over the past decade, the CHA has made substantial investments in security, installing police cameras throughout the development, but there are still frequent incidents—such as a shooting that occurred in a nearby convenience store in 2011, leaving four people dead and two wounded (Gorner 2011).

About one-half of Chicago and Portland residents report shooting and violence as big

neighborhood problems. This is comparable to the reports of the Chicago Demonstration participants who lived in two deteriorating public housing developments in 2007, but lower than Chicago Panel study residents in 2001,⁴ consistent with the fact that CHA's public housing has improved over time, but that the developments have persistent problems with crime (Popkin et al. 2002 and 2008). Gangs are also a significant issue—about one-half of Altgeld adults and one-third Portland adults cite gangs as a big neighborhood problem.⁵ These perceptions may not reflect actual crime rates—official crime statistics document much higher levels of crime in Altgeld's neighborhood. In 2012, Altgeld's community area, Riverdale, had an average 1,581 crimes per 1,000,⁶ New Columbia's neighborhood, Portsmouth, had 473 crimes per 1,000; and Humboldt Garden's neighborhood, Humboldt, had 633 crimes per 1,000.⁷ The reports from the Portland participants likely reflect a set of high-profile violent incidents in one of the HOST sites, which, according to the case management staff, traumatized community members (Scott, Falkenburger et al. 2013). The disparity in reports of people being attacked or robbed may better reflect the difference between the two sites; three times as many Chicago HOST participants (36 percent) indicate this as a big neighborhood problem as did Portland participants (12 percent).

Beyond violent crime, our survey shows that the two HOST communities—especially Altgeld—are struggling with chronic social disorder: drug trafficking, drug use, loitering, and gang activity. One-third of HOST adults in both sites perceive loitering or people just hanging out as a significant neighborhood problem (41 percent in Chicago and 35 percent in Portland). In addition, in our survey with HOST youth ages 12–16, over one-half of children say they saw people yelling or cursing in public more than once in the past year. Drug use and trafficking are serious problems in Altgeld—one-half of the Chicago

adults report drug dealing (48 percent) and use (58 percent) are big problems in their community. Likewise, nearly one-half of Altgeld youth report witnessing open drug markets (43 percent) and drug paraphernalia on the ground or in public (35 percent) more than once in the past year. According to resident reports, Portland's drug problem is less severe, but still significant—one-third of Portland adults report big problems with drug dealing and 42 percent say drug use is a big problem in their community.

A Dangerous Place for Women

Another indicator of community distress is what we have termed a "coercive sexual environment." Our prior work suggests that a coercive sexual environment can emerge in a neighborhood with chronic violence, low collective efficacy (trust and cohesion among residents), and little social control. In these communities, sexual harassment and degradation, and abuse of women and girls are normalized; that is, part of daily life, while still being shameful and traumatizing for residents (Smith et al. forthcoming; Popkin, Leventhal, and Weisman 2010). Over one-quarter of surveyed HOST adults—the majority of whom are women (93 percent)—report receiving unwanted sexual comments, jokes, or gestures (34 percent in Chicago and 25 percent in Portland); 7 percent said they were grabbed, pinched, or touched in a sexual way; and one in 10 were brushed up against in a sexual way in the past 12 months. Children are exposed to this degrading behavior: One-third of youth said they saw men publicly mistreating women physically (46 percent) or verbally (32 percent) in the past year. Our survey also suggests that this unwanted sexual attention can be debilitating for residents; one in four Chicago adults and 18 percent of Portland participants were afraid to go out because of this unwanted attention.

Concurrent with theories and themes of low collective efficacy aiding and encouraging a more coercively sexual environment, less

than one-half of respondents (43 percent) reported people standing up for them when they received this unwanted physical or verbal sexual attention.

While they report serious problems with crime, disorder, and harassment in their communities, HOST youth still say they usually feel safe in their neighborhoods (60 percent in Chicago and 88 percent in Portland). In fact, the portion of Portland youth who feel safe is comparable to the national average in the 1994 National Longitudinal Study of Adolescent Health's survey with middle and high schoolers (90 percent).⁸ Youth's perceptions of safety, however, may reflect desensitization to violence rather than actual safety because they also report high incidents of victimization and exposure to violence. Over one-quarter of Chicago youth (28 percent) had a knife or gun pulled on them, were cut or stabbed, or were jumped in the past year. In addition, two-thirds of Chicago youth and one-third of Portland youth have heard gun shots more than once in the past year.

Residents Suffer from Poor Mental Health

Social disorder and sexual harassment often cause adults and children to have high levels of stress and trauma and to exhibit emotional and behavioral ailments, as seen in the devastating levels of HOST adult and youth worry and depression explained by Scott, Popkin, et al. (2013) and Jordan and Mireles (2013) (see Popkin and McDaniel 2013). HOST parents have similar rates of anxiety and depression as the "high risk" families in the Chicago Family Case Management Demonstration, and the youth anxiety and worry incidences are almost twice the national average in the Portland site and almost three times the average in Chicago. Adults' experience with sexual harassment, in particular, has a substantial relationship with mental health—for every type of sexual harassment an adult experienced in the past year, they were 66 percent

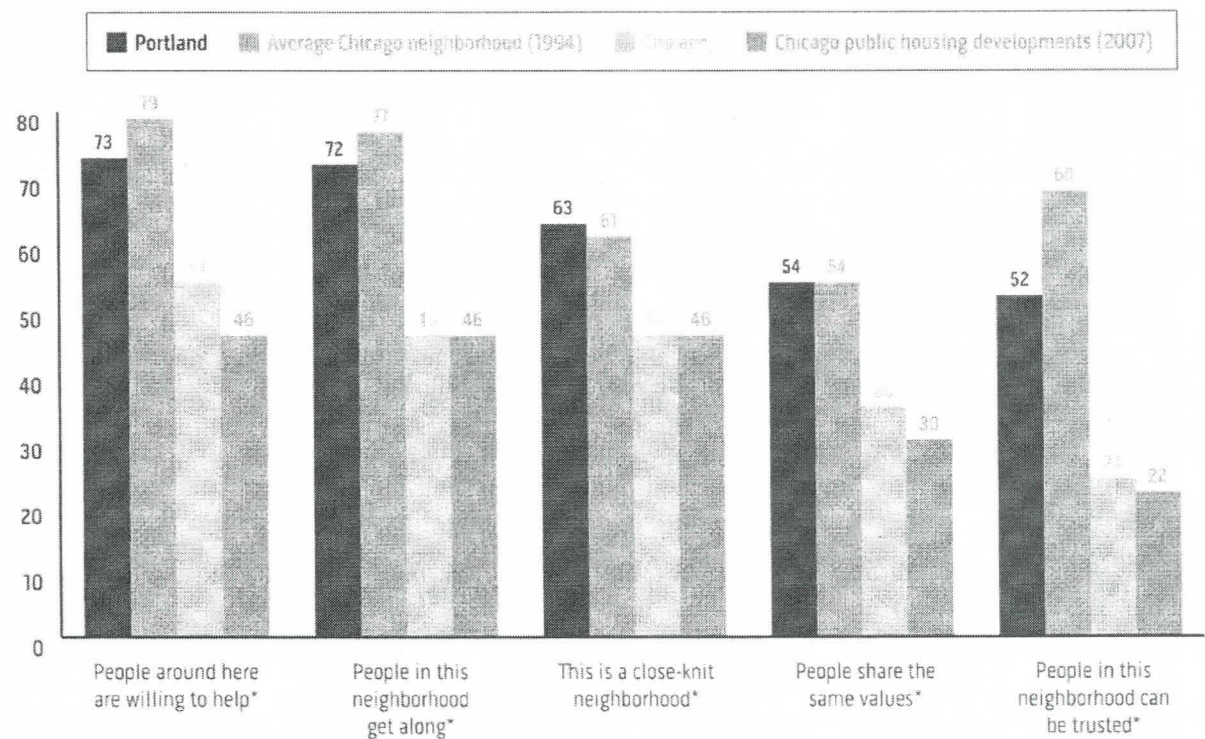
more likely to be depressed and 36 percent more likely to be anxious.⁹ These alarming levels of mental health issues could be related to HOST families' instability, including a 50 percent adult unemployment rate, one-half of youth being disengaged in school, and one-half of Chicago youth and one in three Portland youth being suspended from school in past year, and whole community instability. To address these individual impacts of chronic disadvantage and their subsequent community-wide impacts (drug use, crime, and gang activity), Chicago offers adults and youth individual and small group therapy and Portland, similarly, offers small group and family therapy and activities and mentoring for children (Scott, Falkenburger et al. 2013).

HOST participants' fear of violence also provides a challenge to families and youth reaching their self-sufficiency and well-being goals and youth engaging in programming and services. Case managers from Chicago have indicated that potential threats of violence, shootings, bullying, and sexual coercion isolate children in their homes, especially during the summer months. To remedy this barrier, adult case managers and concerned parents have created a "human bus" system in which adults escort groups of young people directly from their homes to activities, classes, or other events.

High Community Cohesion in Portland and "Community Depression" in Chicago

Concentrated disadvantage, social disorder, and chronic violence not only lead to poor outcomes for parents and youth, but also can erode community collective-efficacy—cohesion, shared values, expectations, and trust. Chicago participants' perceptions of collective efficacy are extremely low, demonstrating this community erosion—only one-quarter of residents believe people in their neighborhood can be trusted (Popkin and McDaniel 2013; Sampson 2012).

Figure 1. Portland Residents Perceive Higher Neighborhood Collective Efficacy than Chicago Residents



*Difference between the Chicago and Portland sites is statistically significant at the .01 level

Source: HOST Baseline Survey, 2012; Chicago Family Case Management Demonstration Baseline Survey, 2007; and Project on Human Development in Chicago Neighborhoods: Community Survey, 1994–1995

Note: The collective efficacy scales in the HOST Baseline Survey and Chicago Family Case Management Demonstration Baseline Survey are four-point Likert scales and the Project on Human Development in Chicago Neighborhoods (PHDCN) collective efficacy scale uses a five-point Likert scale. To compare these scales, it is assumed one-half the respondents in the middle category of the PHDCN five-point scale would have chosen either the upper middle or lower middle categories, if presented with the four-point scale.

Our survey results indicate that the Portland HOST sites are much stronger (see figure 1), with rates comparable to the average Chicago neighborhood¹⁰—a notable finding given the sites’ ethnic and racial diversity and the language barriers that can keep neighbors from communicating. Altgeld Garden’s low rates of community trust and solidarity, on the other hand, are similar to residents from our studies of other distressed public housing communities in Chicago.¹¹ High levels of community cohesion, like in the Portland sites, mediate potential neighborhood crime and disorder and serve as a great launching

point for the continued neighborhood improvement hoped for through HOST (Sampson 2012). Youth in both communities are highly connected to their neighbors, indicating high rates of knowing (73 percent in Chicago; 65.6 Portland) and talking to their neighbors (82 percent in Chicago and 81 percent in Portland), compared with the 1994 national average (70 percent and 78 percent, respectively).¹² Consistent with Sampson’s argument (2012) that strong social connections are not “inherently pro-social,” despite the high rates of neighborhood social interactions and

correspondence with their parents, Chicago youth reported lower rates of neighbors looking out for each other (61 percent) than the Portland (79 percent) and national average (71 percent). The Chicago HOST site aims to remedy its low level of community cohesion and trust by creating a HOST community of families collectively reaching their goals with positive reinforcement and encouragement. Community-wide parties hosted each quarter to highlight and celebrate youth goal setting and achievements are one tactic; this could increase resident interaction and assist in galvanizing

families amongst shared values, norms, and, possibly, further community activities (Tseng and Seidman 2007).

Looking Ahead: Community Impacts of Intensive Family Case Management Services

The HOST demonstration builds on the substantial investments the CHA and Home Forward have made in both sites. In addition to its new redeveloped homes and neighborhood amenities, the Portland HOST site has a high neighborhood collective efficacy that serves as viable base for the HOST neighborhood improvement goals. Chicago's low community cohesion and both sites' moderate violence and social disorder, however, challenge HOST's individual and collective sufficiency objectives, as youth and adults suffer from the debilitating emotional and behavioral impacts of violence. Although it is possible that HOST's individualized efforts will not be able to substantially improve the community distress described by Chicago residents nor advantages already permeating in Portland, at the end of the demonstration we hope these efforts will lead to increased individual and community well-being: violence and disorder will decline as the most troubled families' lives are stabilized through adult and youth services, HOST participants' mental health will improve as a result of counseling and decreased neighborhood violence, and Chicago's community cohesion and trust will increase as neighbors encourage one another's success (see figure 1). The rehabilitation of public housing, like in Altgeld, and the redevelopment of public housing into mixed-income communities, as in the Portland sites, has proven effects on resident's housing and neighborhood quality (Popkin and McDaniel, 2013); the HOST community impacts will provide a framework to maintain these physical improvements by comprehensively serving the most vulnerable—and possibly most disruptive—families and enhancing their well-being. *

Notes

1. Altgeld Gardens is located within Census Tract 5401.01. Data reported from the 2010 Census.
2. See "From Columbia Villa to New Columbia." New Columbia. Accessed August 21, 2013. <http://www.newcolumbia.org/our-roots/history/>.
3. Humboldt Gardens is a racially diverse community of white (56 percent), African American (28 percent), and Hispanic or Latino (11 percent) residents. Residents in the New Columbia, Tamarack Apartment Census Tracts are the most diverse among the Chicago and Portland sites (59.7 percent white, 22.4 percent black or African American, and 23.6 percent Hispanic or Latino in New Columbia, and 60.2 percent white, 15.6 percent black or African American, and 16.3 percent Hispanic or Latino in Tamarack). Tamarack Apartments falls under Census Tract 39.01, New Columbia under 40.01, and Humboldt Gardens under 34.01. All data reported from Census 2010.
4. In 2007, 50 percent of the Chicago Case Management Demonstration participants from CHA public housing developments, Madden/Wells and Dearborn Homes, rated shooting and violence as big neighborhood problems. In 2001, 69 percent of Madden/Wells residents rated this as a major neighborhood issue.
5. In the 2011 Long Term Outcomes Study, the 10- and 4-year follow-up with Chicago Panel Study and Demonstration residents, 24 percent of mixed income development and 19 percent of traditional public housing residents who formerly lived in Madden Wells or Dearborn Homes rated gangs as a big neighborhood problem.
6. Riverdale's crime rate was calculated using 2012 community area crime data from the City of Chicago Data Portal (see <https://data.cityofchicago.org/>) and 2010 census population data. See http://www.cityofchicago.org/city/en/depts/dcd/supp_info/community_area_2000and2010censuspopulationcomparisons.html. Reports of battery, arson, burglary, homicide, robbery, sex offense, assault, theft, and motor vehicle theft are included in these calculations.
7. Portsmouth and Humboldt's crime rates were calculated using 2012 neighborhood crime data from the City of Portland's Crime Stats Portal. See <http://www.portlandoregon.gov/police/crimestats/index.cfm>) and 2010 Census population data <http://www.portlandoregon.gov/oni/56897>. Reports of aggravated assault, arson, burglary, homicide, larceny, rape, robbery, sex crime, simple assault, stolen property, theft from vehicle, and vehicle theft are included in these calculations.
8. National Average derived from the 1994 National Longitudinal Study of Adolescent Health Adolescent In-Home Interview conducted with a nationally representative sample of 12,105 youth in grades 7 through 12 in the 1994–95 school year. See <http://www.icpsr.umich.edu/cgi-bin/SDA/DSDR/hsda?dsdr+21600-0001>.
9. Instances of adult depression and anxiety were modeled using multivariate logistic regressions. The dependent variable for the depression model was whether a resident indicated being depressed in the past year according to the Composite International Diagnostic Interview (CIDI), a validated depression screening tool used in the National Health Interview Survey. Indicating a sexual harassment experience in the past year, neighborhood social disorder, and physical health were significant at the .1 level, controlling for age, gender, and immigration status. The dependent variable for the anxiety model was if the adult answered yes to "During the past 12 months, have you ever had a period of time lasting one month or longer when most of the time you felt worried, tense, or anxious?" Indicating a sexual harassment action in the past year, neighborhood social disorder, neighborhood violence, and physical health were significant at the .1 level, controlling for age, gender, and immigration status. The sexual harassment/CSE scale is an additive scale (alpha=.71) of residents indicating the following has happened once or more in the past year: unwanted sexually touched or grabbed, unwanted sexual comments, jokes or gestures, brushed against in a sexual way, someone spread sexual rumors, and afraid to go someplace because of this unwanted sexual attention.
10. Collective Efficacy scales are comparable to Sampson's 1994 Project on Human Development in Chicago Neighborhoods, a large-scale, interdisciplinary study of how families, schools, and neighborhoods affect child and adolescent development. City-wide Chicago collective efficacy averages are derived from a sample of 8,782 adult Chicago residents from across 343 neighborhood clusters in 1994. This study was conducted during the height of the drug and violence epidemic in Chicago.
11. Rates are similar to those in the Chicago Family Case Management Demonstration 2007 study of residents living in Chicago's Madden/Wells and Dearborn Homes.
12. National Average derived from the 1994 National Longitudinal Study of Adolescent Health Adolescent In-Home Interview conducted with a nationally representative sample of 12,105 youth in grades 7 through 12 in the 1994–95 school year. See <http://www.icpsr.umich.edu/cgi-bin/SDA/DSDR/hsda?dsdr+21600-0001>.

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Baseline Survey

During this first year, the Urban Institute fielded two surveys—an adult survey and a youth survey—to capture baseline outcomes for HOST families and their communities. The adult survey asked respondents about themselves and up to two focal children—one between the age of 6 and 11, and another between the age of 12 and 16. Parents with a child in the older age range could then consent for that child to participate in a separate youth survey. Overall, response rate exceeded 80 percent among adults and 90 percent among eligible youth in both sites. The survey table describes the basic characteristics of adults, focal children, and youth respondents.

Survey Response Rates and Respondent Characteristics.			
	TOTAL	CHICAGO	PORTLAND
Total HOST families	366	230	136
Adult Survey			
Number of adult respondents	299.0	192.0	107.0
Percent female	93.3	95.3	89.5
Mean age	36.7	36.5	37.2
Number of focal children 6–11	165.0	98.0	67.0
Percent female	54.7	57.9	50.0
Mean age	9.3	9.1	9.5
Number of focal children 12–16	175.0	130.0	45.0
Percent female	53.3	53.8	51.5
Mean age	14.6	14.5	14.8
Youth Survey			
Number of youth respondents 12–16	145.0	113.0	32.0
Percent female	55.9	54.9	59.4
Mean age	14.0	13.9	14.2

Upcoming Research Tasks

A follow up survey will be fielded in Chicago and Portland late in 2014. Before the survey, the Urban Institute will conduct focus groups, interviews staff and program observations, as well as gather program data on HOST participants. The additional data will provide valuable feedback to the sites to continually refine their HOST model, contribute to a robust outcomes evaluation, and provide context for the larger evaluation findings.

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Tseng, Vivian and Seidman, Edward. 2007. A systems framework for understanding social settings. *American Journal of Community Psychology*. 39 (3-4): 217-228.

HOST Demonstration Program and Funding Overview

Housing Opportunities and Services Together (HOST), launched by the Urban Institute with support of the Open Society Foundations in December 2010, is an innovative approach to coordinating services and programs for adults and youth in public and mixed-income housing. HOST's core case management component helps parents in low-income neighborhoods confront key barrier to self-sufficiency—poor physical and mental health, addictions, low literacy and education attainment, and historically weak connections to the labor force—while simultaneously integrating services for children and youth. The results of the multisite research project will influence how federal agencies such as the US Department of Housing and Urban Development, local housing authorities, and private developers create place-based, multigenerational programs and supportive environments for their residents.

HOST's current funders include Open Society Foundations, Annie E. Casey Foundation, Kresge Foundation, Paul G. Allen Family Foundation, W.K. Kellogg Foundation, National Institutes of Health, and U.S. Department of Housing and Urban Development.

About the Authors

Chantal Hailey is a research associate in the Metropolitan Housing and Communities Policy Center.

Priya Saxena is a research assistant in the Metropolitan Housing and Communities Policy Center.

Housing Opportunity and Services Together Demonstration

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Cover photo: Photo courtesy of John Keating at Home Forward

URBAN INSTITUTE
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(202) 833-7200
paaffairs@urban.org www.urban.org



EXHIBIT K

2013 School Progress Report

George Washington Carver Primary School

901 E 133rd Pl Chicago, IL 60827

(773) 535-5674 • <http://www.carverprimary.cps.k12.il.us>

School Rating

Overall Rating: **LEVEL 3**Status: **ON PROBATION (6 years)**

How does CPS rate this school? Is the school on probation? This school received a Level 3 rating, which is the lowest rating at CPS. This rating is based on the school's score on the Performance Policy. Due to this rating, this school is on probation. To learn more, visit: <http://cps.edu/schoolprogressreports/>

RATING KEY

- LEVEL 1
- LEVEL 2
- LEVEL 3

Student Growth & Attainment

Student Growth: **ABOVE AVERAGE**

Are students at this school making sufficient academic progress each year? Yes, average student growth at this school is above average compared to similar schools nationally. Student growth measures how much students learn in a year, so it is a very important measure of the school's quality. See the back page for growth by grade level.

Reading (percentile)

Grades 3-8 **91st**
National Average

Mathematics (percentile)

Grades 3-8 **25th**
National Average

Student Attainment: **FAR BELOW AVERAGE**

Are students at this school meeting grade level standards? No, average student attainment at this school is far below average compared to schools nationally. Student attainment measures how well students score on standardized tests compared to national average performance. See the back page for attainment by grade level.

Reading (percentile)

Grades 2-8 **3rd**
National Average

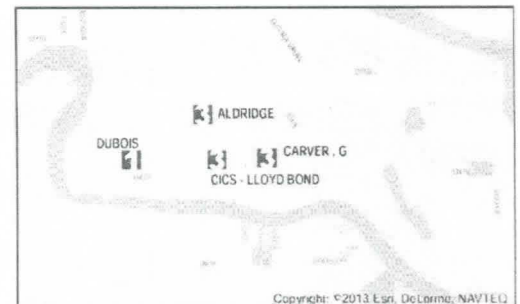
Mathematics (percentile)

Grades 2-8 **3rd**
National Average

Neighborhood Map

How are schools in the neighborhood doing?

This map shows how schools near George Washington Carver Primary School are performing. If you want to learn more about these or other schools, please visit www.cps.edu/schools



MAP KEY

1 LEVEL 1 2 LEVEL 2 3 LEVEL 3 □ NOT ENOUGH DATA

Culture & Climate

School Culture and Climate: **NOT YET ORGANIZED**

Is this school organized for improvement? This school is "Not Yet Organized for Improvement" which means there are several weaknesses with the school's culture and climate, suggesting that the school is not set up for success. Results are based on student and teacher responses to the My Voice, My School 5Essentials survey. For more information on this survey and other measures of school culture and climate visit <https://cps.5-essentials.org/2013/>

SURVEY RESPONSE RATE

Respondent	Response Rate	CPS Average
Students	72.5%	77%
Teachers	83.3%	81%

Certifications



Healthy Schools Certification

This school has not yet become Healthy Schools Certified. CPS supports schools in achieving the HealthierUS School Challenge (HUSC) through LearnWELL, as HUSC is a step for schools to complete along their LearnWELL trajectory. Learn more at www.learnwellcps.org



Creative Schools Certification

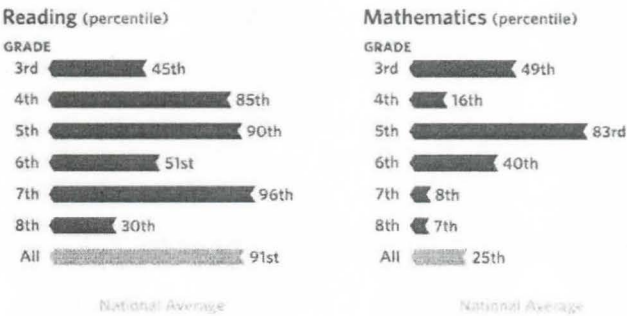
This school has an arts designation of Incomplete Data, meaning it may or may not meet the goals and priorities of the CPS Arts Education Plan, but has insufficient data available to complete an assessment. To learn more, visit: <http://www.cpsarts.org/creative-schools-certification/>

You can find more information about the measures used in this report on the www.cps.edu/schooldata web site.

Student Growth & Attainment Grade Level Results

Student Growth: ABOVE AVERAGE

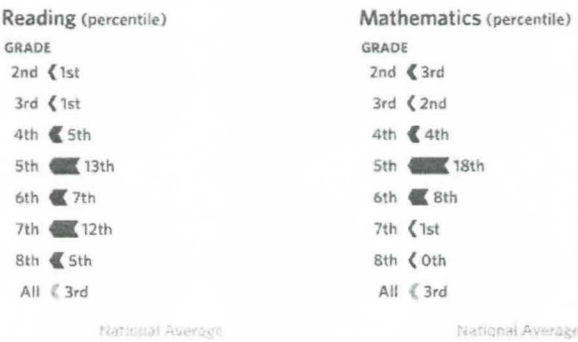
These charts show the national percentile of the school based on average student growth on the NWEA MAP[®] test between the fall and spring. The percentile is the school's national rank compared to schools that started with similar scores in the fall. A 50th percentile score means the school is at the national average of growth.



To learn more about NWEA MAP[®], visit www.nwea.org

Student Attainment: FAR BELOW AVERAGE

These charts show the national percentile of the school based on the average student score on the spring NWEA MAP[®] test. The percentile is the school's national rank. A 50th percentile score means the school is performing at the national average.



To learn more about NWEA MAP[®], visit www.nwea.org

Culture & Climate Details

School Culture and Climate: NOT YET ORGANIZED

5Essentials: This is based on the *My Voice, My School* 5Essentials survey of teachers and 6th-12th grade students. To see the complete report for your school, visit: <https://cps.5-essentials.org/2013>

The 5Essentials from the <i>My Voice, My School</i> Survey	This School's Score
Involved Families: Does the school partner with families and communities?	WEAK
Supportive Environment: Is the school safe and supportive with high expectations?	WEAK
Ambitious Instruction: Is instruction focused, challenging and engaging?	WEAK
Effective Leaders: Does leadership focus on results and school improvement?	NEUTRAL
Collaborative Teachers: Do teachers work well together and strive for excellence?	NEUTRAL

Parent Survey Results: To learn more, visit www.cps.edu/parentsurvey

Questions from the <i>My Voice, My School</i> Survey	This School's Score
School Community: Do parents feel welcome and included in the school?	NEUTRAL
Parent-Teacher Partnership: Do parents feel teachers partner with them to support student success?	NEUTRAL
Quality of Facilities: Do parents feel satisfied with the physical environment of their child's school?	STRONG

Safety: Student views of safety

Measure from the <i>My Voice, My School</i> Survey	This School's Score
Safety: Do students feel safe and does the school support positive behavior?	WEAK

Behavior and Discipline: How the school addresses student discipline

Metric	2012	2013	District Average
Number of suspensions per 100 students	14.6	10.9	13.0
Percent of misconducts resulting in suspension	38.0%	23.8%	51.1%
Average length of suspensions	4.2 days	3.2 days	2.2 days

Other Important Metrics

Metric	2012	2013	District Average
Student attendance	92.4%	90.5%	94.5%
Teacher attendance	94.8%	95.1%	95.0%
Grades 3 to 8 on-track for high school	--	52.4%	70.7%

COLOR KEY

Student Growth & Attainment

- FAR ABOVE AVERAGE
- ABOVE AVERAGE
- AVERAGE
- BELOW AVERAGE
- FAR BELOW AVERAGE

School Culture & Climate

- WELL-ORGANIZED
- ORGANIZED
- MODERATELY ORGANIZED
- PARTIALLY ORGANIZED
- NOT YET ORGANIZED

Survey Results

- VERY STRONG
- STRONG
- NEUTRAL
- WEAK
- VERY WEAK

2013 School Progress Report

Ira F Aldridge Elementary School

630 E 131st St Chicago, IL 60827
(773) 535-5614 • <http://cps.edu>

School Rating

Overall Rating: **LEVEL 3**Status: **ON PROBATION (7 years)**

How does CPS rate this school? Is the school on probation? This school received a Level 3 rating, which is the lowest rating at CPS. This rating is based on the school's score on the Performance Policy. Due to this rating, this school is on probation. To learn more, visit: <http://cps.edu/schoolprogressreports/>

RATING KEY

- LEVEL 1
- LEVEL 2
- LEVEL 3

Student Growth & Attainment

Student Growth: **FAR BELOW AVERAGE**

Are students at this school making sufficient academic progress each year? No, average student growth at this school is far below average compared to similar schools nationally. Student growth measures how much students learn in a year, so it is a very important measure of the school's quality. See the back page for growth by grade level.

Reading (percentile)

Grades 3-8 < 0th

National Average

Mathematics (percentile)

Grades 3-8 < 0th

National Average

Student Attainment: **FAR BELOW AVERAGE**

Are students at this school meeting grade level standards? No, average student attainment at this school is far below average compared to schools nationally. Student attainment measures how well students score on standardized tests compared to national average performance. See the back page for attainment by grade level.

Reading (percentile)

Grades 3-8 < 2nd

National Average

Mathematics (percentile)

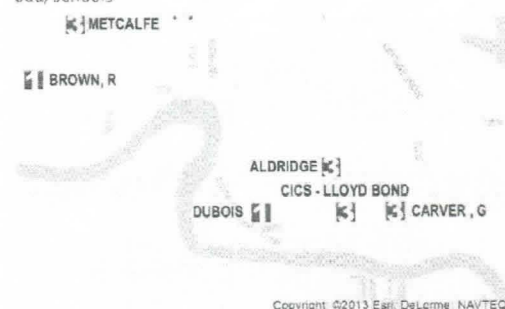
Grades 3-8 < 0th

National Average

Neighborhood Map

How are schools in the neighborhood doing?

This map shows how schools near Ira F Aldridge Elementary School are performing. If you want to learn more about these or other schools, please visit www.cps.edu/schools



MAP KEY

LEVEL 1 LEVEL 2 LEVEL 3 NOT ENOUGH DATA

Culture & Climate

School Culture and Climate: **PARTIALLY ORGANIZED**

Is this school organized for improvement? This school is "Partially Organized for Improvement" which means that the school's culture and climate has a few strengths, but also has several weaknesses. Results are based on student and teacher responses to the My Voice, My School 5Essentials survey. For more information on this survey and other measures of school culture and climate visit <https://cps.5-essentials.org/2013/>

SURVEY RESPONSE RATE

Respondent	Response Rate	CPS Average
Students	80.4%	77%
Teachers	70.6%	81%

Certifications



Healthy Schools Certification

This school has not yet become Healthy Schools Certified. CPS supports schools in achieving the HealthierUS School Challenge (HUSC) through LearnWELL, as HUSC is a step for schools to complete along their LearnWELL trajectory. Learn more at www.learnwellcps.org



Creative Schools Certification

This school is Developing in the arts. It occasionally meets the goals and priorities of the CPS Arts Education Plan including Staffing & Instruction, Partnerships, Community & Culture and Budget & Planning. To learn more, visit: <http://www.cpsarts.org/creative-schools-certification/>

You can find more information about the measures used in this report on the www.cps.edu/schooldata web site.

Student Growth & Attainment Grade Level Results

Student Growth: FAR BELOW AVERAGE

These charts show the national percentile of the school based on average student growth on the NWEA MAP[®] test between the fall and spring. The percentile is the school's national rank compared to schools that started with similar scores in the fall. A 50th percentile score means the school is at the national average of growth.

Reading (percentile)

GRADE
3rd < 5th
4th < 0th
5th < 0th
6th < 1st
7th < 2nd
8th < 0th
All < 0th

National Average

To learn more about NWEA MAP[®], visit www.nwea.org

Mathematics (percentile)

GRADE
3rd < 1st
4th < 0th
5th < 3rd
6th < 0th
7th < 12th
8th < 0th
All < 0th

National Average

Student Attainment: FAR BELOW AVERAGE

These charts show the national percentile of the school based on the average student score on the spring NWEA MAP[®] test. The percentile is the school's national rank. A 50th percentile score means the school is performing at the national average.

Reading (percentile)

GRADE
2nd No Data
3rd < 11th
4th < 1st
5th < 1st
6th < 3rd
7th < 5th
8th < 2nd
All < 2nd

National Average

To learn more about NWEA MAP[®], visit www.nwea.org

Mathematics (percentile)

GRADE
2nd No Data
3rd < 4th
4th < 1st
5th < 1st
6th < 1st
7th < 1st
8th < 1st
All < 0th

National Average

Culture & Climate Details

School Culture and Climate: PARTIALLY ORGANIZED

5Essentials: This is based on the *My Voice, My School* 5Essentials survey of teachers and 6th-12th grade students. To see the complete report for your school, visit: <https://cps-5-essentials.org/2013>

The 5Essentials from the <i>My Voice, My School</i> Survey	This School's Score
Involved Families: Does the school partner with families and communities?	WEAK
Supportive Environment: Is the school safe and supportive with high expectations?	WEAK
Ambitious Instruction: Is instruction focused, challenging and engaging?	NEUTRAL
Effective Leaders: Does leadership focus on results and school improvement?	NEUTRAL
Collaborative Teachers: Do teachers work well together and strive for excellence?	STRONG

Parent Survey Results: To learn more, visit www.cps.edu/parentsurvey

Questions from the <i>My Voice, My School</i> Survey	This School's Score
School Community: Do parents feel welcome and included in the school?	WEAK
Parent-Teacher Partnership: Do parents feel teachers partner with them to support student success?	NEUTRAL
Quality of Facilities: Do parents feel satisfied with the physical environment of their child's school?	NEUTRAL

Safety: Student views of safety

Measure from the <i>My Voice, My School</i> Survey	This School's Score
Safety: Do students feel safe and does the school support positive behavior?	WEAK

Behavior and Discipline: How the school addresses student discipline

Metric	2012	2013	District Average
Number of suspensions per 100 students	60.2	9.3	13.0
Percent of misconducts resulting in suspension	98.8%	96.0%	51.1%
Average length of suspensions	3.4 days	3.1 days	2.2 days

Other Important Metrics

Metric	2012	2013	District Average
Student attendance	92.2%	93.3%	94.5%
Teacher attendance	94.9%	92.9%	95.0%
Grades 3 to 8 on-track for high school	--	69.8%	70.7%

COLOR KEY

Student Growth & Attainment
FAR ABOVE AVERAGE
ABOVE AVERAGE
AVERAGE
BELOW AVERAGE
FAR BELOW AVERAGE

School Culture & Climate
WELL-ORGANIZED
ORGANIZED
MODERATELY ORGANIZED
PARTIALLY ORGANIZED
NOT YET ORGANIZED

Survey Results
VERY STRONG
STRONG
NEUTRAL
WEAK
VERY WEAK

2013 School Progress Report

William E B Dubois Elementary School

330 E 133rd St Chicago, IL 60827

(773) 535-5582 • <http://www.dubois.cps.k12.il.us>

School Rating

Overall Rating:

LEVEL 1

Status:

ON PROBATION (6 years)

How does CPS rate this school? Is the school on probation? This school received a Level 1 rating, which is the highest rating at CPS. This rating is based on the school's score on the Performance Policy. The school is on probation and must achieve a Level 1 or Level 2 rating for two years in a row to be removed from probation. To learn more, visit: <http://cps.edu/schoolprogressreports/>

RATING KEY

LEVEL 1
LEVEL 2
LEVEL 3

Student Growth & Attainment

Student Growth:

BELOW AVERAGE

Are students at this school making sufficient academic progress each year? No, average student growth at this school is below average compared to similar schools nationally. Student growth measures how much students learn in a year, so it is a very important measure of the school's quality. See the back page for growth by grade level.

Reading (percentile)

Grades 3-8 14th

National Average

Mathematics (percentile)

Grades 3-8 32nd

National Average

Student Attainment:

FAR BELOW AVERAGE

Are students at this school meeting grade level standards? No, average student attainment at this school is far below average compared to schools nationally. Student attainment measures how well students score on standardized tests compared to national average performance. See the back page for attainment by grade level.

Reading (percentile)

Grades 2-8 5th

National Average

Mathematics (percentile)

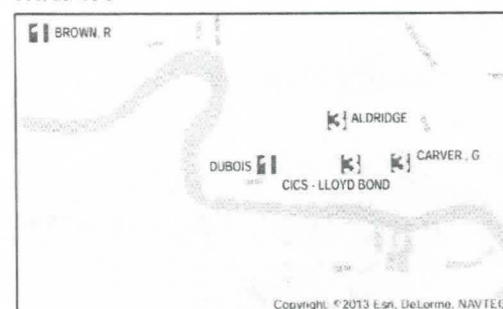
Grades 2-8 8th

National Average

Neighborhood Map

How are schools in the neighborhood doing?

This map shows how schools near William E B Dubois Elementary School are performing. If you want to learn more about these or other schools, please visit www.cps.edu/schools



MAP KEY

LEVEL 1 LEVEL 2 LEVEL 3 NOT ENOUGH DATA

Culture & Climate

School Culture and Climate:

Is this school organized for improvement? This school is "Moderately Organized for Improvement" which means that the school has both strengths and weaknesses in their culture and climate. Results are based on student and teacher responses to the My Voice, My School SEssentials survey. For more information on this survey and other measures of school culture and climate visit <https://cps.5-essentials.org/2013/>

SURVEY RESPONSE RATE

Respondent	Response Rate	CPS Average
Students	90.6%	77%
Teachers	100%	81%

Certifications



Healthy Schools Certification

This school has not yet become Healthy Schools Certified. CPS supports schools in achieving the HealthierUS School Challenge (HUSC) through LearnWELL, as HUSC is a step for schools to complete along their LearnWELL trajectory. Learn more at www.learnwellcps.org



Creative Schools Certification

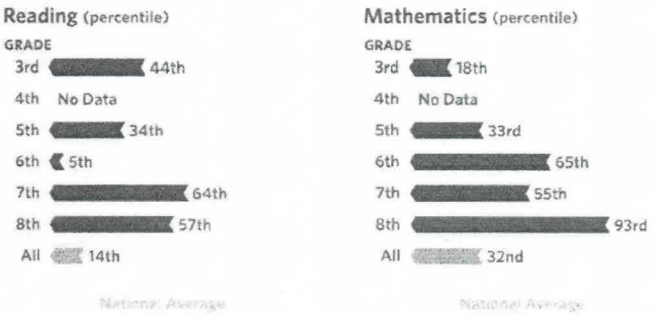
This school has an arts designation of Incomplete Data, meaning it may or may not meet the goals and priorities of the CPS Arts Education Plan, but has insufficient data available to complete an assessment. To learn more, visit: <http://www.cpsarts.org/creative-schools-certification/>

You can find more information about the measures used in this report on the www.cps.edu/schooldata web site.

Student Growth & Attainment Grade Level Results

Student Growth: **BELOW AVERAGE**

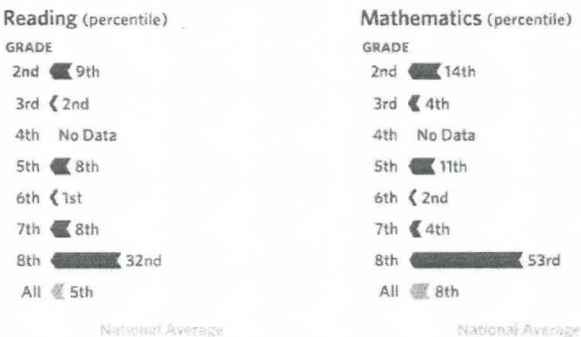
These charts show the national percentile of the school based on average student growth on the NWEA MAP[®] test between the fall and spring. The percentile is the school's national rank compared to schools that started with similar scores in the fall. A 50th percentile score means the school is at the national average of growth.



To learn more about NWEA MAP[®], visit www.nwea.org

Student Attainment: **FAR BELOW AVERAGE**

These charts show the national percentile of the school based on the average student score on the spring NWEA MAP[®] test. The percentile is the school's national rank. A 50th percentile score means the school is performing at the national average.



To learn more about NWEA MAP[®], visit www.nwea.org

Culture & Climate Details

School Culture and Climate: **MODERATELY ORGANIZED**

5Essentials: This is based on the *My Voice, My School* 5Essentials survey of teachers and 6th-12th grade students. To see the complete report for your school, visit: <https://cps.5-essentials.org/2013>

The 5Essentials from the <i>My Voice, My School</i> Survey	This School's Score
Involved Families: Does the school partner with families and communities?	WEAK
Supportive Environment: Is the school safe and supportive with high expectations?	NEUTRAL
Ambitious Instruction: Is instruction focused, challenging and engaging?	NEUTRAL
Effective Leaders: Does leadership focus on results and school improvement?	STRONG
Collaborative Teachers: Do teachers work well together and strive for excellence?	NEUTRAL

Parent Survey Results: To learn more, visit www.cps.edu/parentsurvey

Questions from the <i>My Voice, My School</i> Survey	This School's Score
School Community: Do parents feel welcome and included in the school?	NEUTRAL
Parent-Teacher Partnership: Do parents feel teachers partner with them to support student success?	NEUTRAL
Quality of Facilities: Do parents feel satisfied with the physical environment of their child's school?	NEUTRAL

Safety: Student views of safety

Measure from the <i>My Voice, My School</i> Survey	This School's Score
Safety: Do students feel safe and does the school support positive behavior?	NEUTRAL

Behavior and Discipline: How the school addresses student discipline

Metric	2012	2013	District Average
Number of suspensions per 100 students	26.4	12.7	13.0
Percent of misconducts resulting in suspension	72.1%	62.9%	51.1%
Average length of suspensions	2.5 days	2.2 days	2.2 days

Other Important Metrics

Metric	2012	2013	District Average
Student attendance	94.4%	94.4%	94.5%
Teacher attendance	95.6%	94.2%	95.0%
Grades 3 to 8 on-track for high school	--	67.6%	70.7%

COLOR KEY

Student Growth & Attainment

- FAR ABOVE AVERAGE
- ABOVE AVERAGE
- AVERAGE
- BELOW AVERAGE
- FAR BELOW AVERAGE

School Culture & Climate

- WELL-ORGANIZED
- ORGANIZED
- MODERATELY ORGANIZED
- PARTIALLY ORGANIZED
- NOT YET ORGANIZED

Survey Results

- VERY STRONG
- STRONG
- NEUTRAL
- WEAK
- VERY WEAK

CHICAGO
PUBLIC
SCHOOLS

CPS

2013 School Progress Report

Chicago Intl Charter - Lloyd Bond

13300 S Langley Ave Chicago, IL 60827
(773) 468-1300 • <http://www.chicagointl.org/>

School Rating

Overall Rating: **LEVEL 3** Status: **NOT APPLICABLE**

How does CPS rate this school? Is the school on probation? This school received a Level 3 rating, which is the lowest rating at CPS. This rating is based on the school's score on the Performance Policy. To learn more, visit: <http://cps.edu/schoolprogressreports/>

RATING KEY

LEVEL 1

LEVEL 2

LEVEL 3

Student Growth & Attainment

Student Growth: **BELOW AVERAGE**

Are students at this school making sufficient academic progress each year? Yes, average student growth at this school is about average compared to similar schools nationally. Student growth measures how much students learn in a year, so it is a very important measure of the school's quality. See the back page for growth by grade level.



Student Attainment: **BELOW AVERAGE**

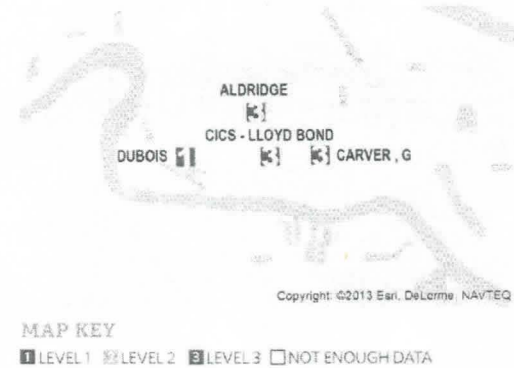
Are students at this school meeting grade level standards? No, average student attainment at this school is below average compared to schools nationally. Student attainment measures how well students score on standardized tests compared to national average performance. See the back page for attainment by grade level.



Neighborhood Map

How are schools in the neighborhood doing?

This map shows how schools near Chicago Intl Charter - Lloyd Bond are performing. If you want to learn more about these or other schools, please visit www.cps.edu/schools



Culture & Climate

School Culture and Climate: **PARTIALLY ORGANIZED**

Is this school organized for improvement? This school is "Partially Organized for Improvement" which means that the school's culture and climate has a few strengths, but also has several weaknesses. Results are based on student and teacher responses to the My Voice, My School 5Essentials survey. For more information on this survey and other measures of school culture and climate visit <https://cps.5-essentials.org/2013/>

SURVEY RESPONSE RATE		
Respondent	Response Rate	CPS Average
Students	100%	77%
Teachers	82.6%	81%

Certifications



Healthy Schools Certification

This school has not yet become Healthy Schools Certified. CPS supports schools in achieving the HealthierUS School Challenge (HUSC) through LearnWELL, as HUSC is a step for schools to complete along their LearnWELL trajectory. Learn more at www.learnwellcps.org



Creative Schools Certification

This school is Excelling in the arts. It meets the goals and priorities outlined in the CPS Arts Education Plan, including Staffing & Instruction, Partnerships, Community & Culture, and Budget & Planning. To learn more, visit: <http://www.cpsarts.org/creative-schools-certification/>

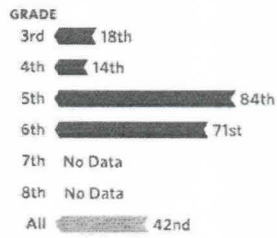
You can find more information about the measures used in this report on the www.cps.edu/schooldata web site.

Student Growth & Attainment Grade Level Results

Student Growth:

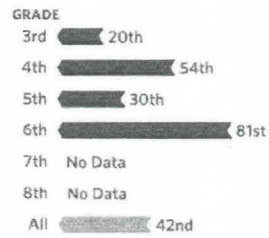
These charts show the national percentile of the school based on average student growth on the NWEA MAP[®] test between the fall and spring. The percentile is the school's national rank compared to schools that started with similar scores in the fall. A 50th percentile score means the school is at the national average of growth.

Reading (percentile)



National Average

Mathematics (percentile)



National Average

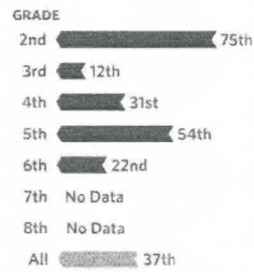
† To learn more about NWEA MAP[®], visit www.nwea.org

Student Attainment:

BELOW AVERAGE

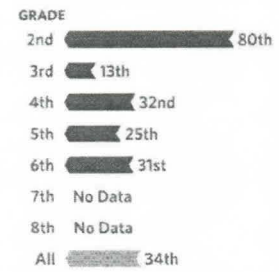
These charts show the national percentile of the school based on the average student score on the spring NWEA MAP[®] test. The percentile is the school's national rank. A 50th percentile score means the school is performing at the national average.

Reading (percentile)



National Average

Mathematics (percentile)



National Average

† To learn more about NWEA MAP[®], visit www.nwea.org

Culture & Climate Details

School Culture and Climate: PARTIALLY ORGANIZED

5Essentials: This is based on the *My Voice, My School* 5Essentials survey of teachers and 6th-12th grade students. To see the complete report for your school, visit: <https://cps.5-essentials.org/2013>

The 5Essentials from the *My Voice, My School* Survey This School's Score

Involved Families: Does the school partner with families and communities?	NEUTRAL
Supportive Environment: Is the school safe and supportive with high expectations?	NEUTRAL
Ambitious Instruction: Is instruction focused, challenging and engaging?	STRONG
Effective Leaders: Does leadership focus on results and school improvement?	WEAK
Collaborative Teachers: Do teachers work well together and strive for excellence?	WEAK

Parent Survey Results: To learn more, visit www.cps.edu/parentsurvey

Questions from the *My Voice, My School* Survey This School's Score

School Community: Do parents feel welcome and included in the school?	NEUTRAL
Parent-Teacher Partnership: Do parents feel teachers partner with them to support student success?	WEAK
Quality of Facilities: Do parents feel satisfied with the physical environment of their child's school?	WEAK

Safety: Student views of safety

Measure from the *My Voice, My School* Survey This School's Score

Safety: Do students feel safe and does the school support positive behavior?	WEAK
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Behavior and Discipline: How the school addresses student discipline

Metric	2012	2013	District Average
Number of suspensions per 100 students	--	--	13.0
Percent of misconducts resulting in suspension	--	--	51.1%
Average length of suspensions	--	--	2.2 days

Other Important Metrics

Metric	2012	2013	District Average
Student attendance	96.9%	92.9%	94.5%
Teacher attendance	--	--	95.0%
Grades 3 to 8 on-track for high school	--	--	70.7%

COLOR KEY

Student Growth & Attainment

	FAR ABOVE AVERAGE
	ABOVE AVERAGE
	AVERAGE
	BELOW AVERAGE
	FAR BELOW AVERAGE

School Culture & Climate

	WELL-ORGANIZED
	ORGANIZED
	MODERATELY ORGANIZED
	PARTIALLY ORGANIZED
	NOT YET ORGANIZED

Survey Results

	VERY STRONG
	STRONG
	NEUTRAL
	WEAK
	VERY WEAK

EXHIBIT L



CHANGE.

CHICAGO HOUSING AUTHORITY

FY2011 ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP)

Approved by Board of Commissioners
July 19, 2011



III. Tenant Selection and Assignment Plan

The Tenant Selection and Assignment Plan (TSAP) is the CHA policy that determines how applicants will be placed on the wait list and in what priority applicants will be screened and offered housing. This policy will be applied to all interested households that apply for public housing and for all new applicants selected from any CHA wait list.

A. Tenant Selection and Assignment Plan (TSAP)

1. Emergency applicants who are victims of federally declared disasters will be offered units on an as needed basis before applicants from the wait list. Applicants from the wait list will be offered units after existing residents receive an offer in accordance with the CHA Leaseholder Housing Choice Relocation Rights Contract 10/1/99 (RRC) or the CHA Relocation Rights Contract for Families with Occupancy after 10/1/99 (Post 10/1/99 RRC) and the Transfer Policy in Section V.
2. Existing residents, who are required to move under the RRC, and the Post 10/1/99 RRC will be processed in accordance with the contracts. Existing residents who are required to transfer by the CHA will be processed in accordance with the Transfer Policy in Section V.
3. All unit offers will be made in writing,¹⁶ and the CHA will not discriminate on grounds of race, color, sex, age (when age eligibility is not a factor), familial status, religion, disability, national origin, ancestry, sexual orientation (including gender identity), marital status, housing status, order of protection status, military discharge status or source of income.

B. Administering Wait Lists

1. For the community-wide (traditional family) wait list, marketing, initial application intake, application processing, and wait list management will be performed by the CHA. Applicant interviews, screening for suitability, eligibility determination, housing offers, and unit assignments will be conducted by the property management company.¹⁷ Property managers are required to report to the CHA on all outreach efforts to applicants, applicant ineligibility findings, unit offers, assignments, and refusals.
2. For community-area (scattered site) wait lists, marketing, application intake, applicant interviews, screening for suitability, eligibility determination, housing offers, and unit assignments will be conducted by the property manager. Application processing and wait list management, monitoring, auditing, and maintenance will be conducted by the CHA. After outreach is complete, property managers are required to forward applications to the CHA for applicants to be placed on the wait list. Property managers must report to the CHA on all outreach efforts to applicants and applicant ineligibility findings, as well as all unit offers, assignments, and refusals.

Property management shall maintain a copy of each application forwarded to the CHA. The CHA will process applications and place applicants on the appropriate wait list. Property managers are required to report to the CHA on all outreach efforts and each applicant's final status as a result of the outreach efforts, as well as all unit offers, assignments, and refusals.

3. For the transfer wait list, resident interviews, eligibility determination, housing offers, and unit assignments will be performed by the receiving property manager. Criminal and credit background screening, transfer processing, and management of the transfer wait list will be performed by the CHA.¹⁸ Exceptions include transfers made within the development including, but not limited to, transfers to the appropriate bedroom size of over housed families and emergency transfers that are expedited and completed by the property manager. All inter-development transfers are required to be processed by the CHA.

¹⁶ Or alternative format as a result of a request for a reasonable accommodation by a qualified applicant or resident with disabilities.

¹⁷ For public housing units in mixed-income/mixed-finance properties, determination and housing assignment will be performed by the property manager of the mixed-income/mixed-finance property.

¹⁸ For public housing units in mixed-income/mixed-finance properties, determination and housing assignment will be performed by the property manager of the mixed-income/mixed-finance property.



4. For the site-based wait lists, marketing, application intake, applicant interviews, screening for suitability, eligibility determination, housing offers, and unit assignments will be completed by the property manager. Application processing as well as wait list management, monitoring, auditing, and maintenance will be conducted by the CHA. Property managers are required to report to the CHA on all outreach efforts to applicants and applicant ineligibility findings, as well as all unit offers, assignments, and refusals.
5. For the 50/80% AMI wait lists, marketing, initial application intake, applicant interviews, screening for suitability, eligibility determination, housing offers, and unit assignments will be conducted in writing by the property manager. Application processing and wait list management, monitoring, auditing, and maintenance will be conducted by the CHA. Property managers are required to report to the CHA on all outreach efforts to applicants and applicant ineligibility findings, as well as all unit offers, assignments, and refusals.

To qualify for the 50/80% wait lists, applicants must have a household income that qualifies within the 50/80% AMI framework, as published by the HUD on an annual basis. Qualification applies to both the time of application and the time the applicant reaches the top of the wait list. Screening will include income verification. Applicants will not be offered units covered by the 50/80% AMI if they cannot meet the income requirements and will be removed from the 50/80% wait list. The applicants will retain their original date of application on the community-wide (traditional family) wait list.

6. For the 50/60% AMI wait lists, marketing, initial application intake, applicant interviews, screening for suitability, eligibility determination, housing offers, and unit assignments will be conducted in writing by the property manager. Application processing and wait list management, monitoring, auditing, and maintenance will be conducted by the CHA. Property managers are required to report to the CHA on all outreach efforts to applicants and applicant ineligibility findings, as well as all unit offers, assignments, and refusals.

Eligible applicants who qualify under the 50/80% AMI wait list, but have a household income within the Low Income Housing Tax Credit (LIHTC) limitation of 50/60% AMI, are eligible applicants for units created at mixed-income properties with public housing units. LIHTC units have an initial eligibility for occupancy that mandates applicants must have a household income, which does not exceed 50/60% AMI threshold, as published by the LIHTC program administered by the Illinois Housing Development Authority (IHDA) and the City of Chicago Department of Housing (DOH), pursuant to 26 USC § 42. Qualification is both at the time of application and at the time the applicant reaches the top of the wait list. Applicants who cannot meet the forgoing 50/60% AMI criteria at the time of initial screening occupancy will not be eligible for public housing units designated as 50/60% AMI units and will be removed from the 50/60% wait list. The applicants will retain their original date of application on the community-wide (traditional family) wait list.

7. Application updates and wait list withdrawals will be processed by the CHA.
8. Property managers must report all applicant ineligibility findings as well as all housing offers, unit assignments, and refusals to the CHA.

C. Community-wide (Traditional Family) Wait List 24 CFR § 1.4(2)(ii).

1. An applicant for a family property, other than a scattered site property reserved for applicants from the community where the unit is located, will submit a pre-application for housing to the CHA.
2. The CHA will maintain the community-wide (traditional family) wait list electronically.
3. It is the applicant's responsibility to contact the CHA in writing or in-person to update his/her application (e.g. contact information and family composition).
4. Applicants will be electronically assigned to a single community-wide (traditional family) wait list in sequence based upon:



- a. Type and size of unit needed (i.e. accessible or non-accessible unit, bedroom size);
 - b. Ranking admissions preference, if any;
 - c. Geographic preference; if any
 - d. Date of application; and
 - e. Income tier.
5. Refusing a unit without good cause or failing to respond to a unit offer will result in the applicant's name being removed from the wait list.
 6. Refusing a unit with good cause will result in the applicant's name being returned to the wait list with his/her original placement on the wait list. Good cause is determined by the property manager. Examples of good cause include, but are not limited to:
 - a. An applicant or transferring resident cannot move at the time of the offer and presents verification that acceptance of the offer of a suitable vacancy will result in undue hardship.
 - b. The unit is not ready for move-in on the date projected for move-in. "Ready for move-in" means the unit has no Uniform Physical Condition Standard (UPCS) deficiencies and is clean.
 - c. The unit is not accessible to a source of employment, education or job training, children's day care, or educational program for children with disabilities¹⁹. The location of the unit would require the adult household member to quit a job, drop out of an educational institution or job training program, or take a child out of day care or an educational program for children with disabilities.
 - d. The family demonstrates that accepting the offer will place a family member's life, health or safety in jeopardy. The family must provide documentation of domestic violence, sexual violence, dating violence, stalking, or hate crimes, and/or other situations of non-random violence that put a resident's life in danger.
 - e. A health professional verifies at the time of the unit offer with supporting documentation of temporary hospitalization or recovery from illness of the head of household, other household members (each as listed on final application or lease), or live-in aide necessary to the care of the head of household.
 - f. The unit has lead-based paint and the family has children under the age of seven and/or a household member(s) has a medical condition(s) that could be negatively impacted by living in a unit with lead based paint.
 - g. The unit is not accessible for a disabled member of the applicant's household.
 - h. The unit has accessibility features not needed by the applicant household.

D. Site-based Wait Lists for Senior Designated Housing Properties 24 CFR § 903.7(b)(2).

1. The CHA received HUD approval for site-based wait lists at its senior designated housing properties.
2. Applicants are allowed to select one senior designated housing site or opt for the first available unit offer from across the entire senior designated housing portfolio.
3. Applicants may change their site selection once every three months, unless the CHA offers them an opportunity to make additional changes. Applicants are not permitted to change their site selection while they are being outreached to and screened by the property manager at the site. Applicants who reject screening or a unit offer for any reason, including because they prefer a different site, will be removed from the site based wait list and must reapply if and when the wait list is opened.
4. The site-based wait lists for senior designated housing properties will be managed, monitored, audited,

¹⁹ If the applicant has a child participating in such a program.



and maintained by the CHA.

5. All senior housing applicants will be placed on the wait list for the site they selected, or they can request first available. When a unit becomes available (e.g. studio apartment or a one bedroom apartment), the unit will be offered to the first eligible family. If the family fails to respond to a unit offer or declines the unit or screening for a unit without good cause, including rejection based on unit size, the applicant will be removed from the wait list.
6. Refusing a unit or a screening for a unit with good cause will result in the applicant's name being returned to the wait list with his/her original date of application on the wait list. Good cause is determined by the property manager.
7. Refusal of a second unit offer or refusal to be screened for a unit, after the initial good cause refusal, will result in the application being removed from the wait list.

E. Community-area (Scattered Site) Wait Lists

1. Applicants for scattered site properties will be offered units in accordance with the Gautreaux court order which states that fifty percent (50%) of scattered site units must be offered to applicants from the community in which the unit is located. Community-area residents living in the same census tract as the unit available are given a priority. Residency will be determined based on the last permanent address of the applicant on the date of application.
2. The CHA will maintain the community-area wait list for scattered site properties. Marketing, screening for suitability, eligibility determination, unit assignment, and unit offers will be conducted by the property manager.
3. It is the applicant's responsibility to contact the CHA in writing or in-person to update his/her application (e.g. contact information and family composition).
4. Refusing a unit offer without good cause or failing to respond to an outreach will result in the applicant being removed from the wait list. Refusal of the first unit offer with good cause will result in the applicant's name being returned to the wait list with the original date of application. Good cause is determined by the property manager. CHA may consider extenuating circumstances on a case by case basis after one good cause for refusal has been provided.
5. Refusal of a second unit offer, after the initial good cause refusal, will result in the application being removed from the wait list.

F. Mixed-Income Developments Unit Offers

1. When mixed-income developments have unit offers available for the community-wide wait list, the CHA will determine the applicant's interest in being screened for a unit at mixed-income sites.
 - a. The CHA will send a notice to all applicants on the community-wide wait list to:
 - i. Provide information about mixed-income sites; and
 - ii. Ask about their interest in being screened for a unit at a mixed-income site, should the next unit available be at a mixed-income site when their name reaches the top of the wait list.
 - b. Applicants will have 30 calendar days to respond to the notice.
 - c. The CHA will flag applicants according to their response.
 - i. Applicants who do not respond to the notice will be deemed as not interested in being screened for a unit at a mixed-income site.
2. The CHA will send the names of all interested applicants to the property managers for screening.
3. The property manager will conduct the outreach and screening activity.
 - a. Applicants who do not meet the site-specific criteria:



- i. Will be returned to their original place on the wait list for future traditional public housing opportunities;
 - ii. Will have the flag of "interested in a mixed-income site" removed, therefore, will not be outreached to for future opportunities at a mixed-income site, unless they affirmatively demonstrate that their circumstances have changed, which cause them to meet the site-specific requirements. It shall be the applicant's sole responsibility to provide information to the CHA to demonstrate their change of circumstance; or
 - iii. Will have their name removed from the CHA community-wide wait list if failure to meet the site-specific criteria was based on negative results to the site's drug-test requirement
4. The property manager will document the outcome of outreach and screening activities in both the physical file and the housing management system.
 5. The CHA will review documentation in order to approve applicants for move-in.
 6. The property manager will make unit offers to applicants approved by the CHA.
 7. The property manager will secure a move-in date for each applicant that accepts a unit offer and provide the CHA with the move-in dates.

G. Transfer Wait List

1. Residents on the transfer wait list will receive one unit offer. However, multiple unit offers may be made in order to satisfy a reasonable accommodation request.
2. Refusal of or failure to respond to unit offers without good cause or failing to respond to an outreach will result in the resident being removed from the wait list. For resident-initiated transfers, if the unit is refused without good cause, the resident may not reapply for 12 months from the date of the final determination letter.
3. Refusal of a second unit offer, after an initial good cause refusal, will result in the resident being removed from the transfer wait list. For resident-initiated transfers, if the unit is refused, the resident may not reapply for 12 months from the date of final determination letter.

H. Making Unit Offers

1. Emergency Transfers, Transfers under the RRC or the Post 10/1/99 RRC, Mandatory Administrative Transfers, Voluntary Administrative Transfers and Incentive Transfers take precedence over new admissions from the wait list. Resident-Initiated Transfers for Good Cause will be processed on an ongoing basis in conjunction with new admissions from the wait list.
2. For new admissions, the CHA will match the next unit available to the highest ranking applicant for a unit by bedroom size, type, and accessible features, if any. Admissions preferences are used to determine the order of selection from the wait list. If two applicants with the same preference status need the same type and size of unit, the applicant with the earliest date of application will be offered the unit. **24 CFR § 960.206(c)**.
3. If more than one unit of the appropriate size and type is available, the first unit to be offered will be the unit that is or will be ready first for move-in. If two units are ready for move-in on the same day, the first unit to be offered will be the first unit that became vacant.
4. An applicant must accept any unit offered within five business days of the date of the unit offer letter (or the date the alternative format of communication designated by an applicant with disabilities was provided).
5. If an applicant refuses a unit offer, the property manager will determine whether the refusal was with or without good cause.
6. For the community-wide (traditional family) and site-based wait lists, if the applicant does not respond to



the unit offer within five business days, he/she will be removed from the wait list.

7. The CHA will offer the non-community area scattered site units (the remaining 50% of scattered site units) in accordance with the Gautreaux court order below (once rights pursuant to the RRC and Post 10/1/99 RRC have been satisfied):
 - a. Twenty-five percent (25%) of the units will be offered to qualified public housing residents from the transfer wait list, and
 - b. Twenty-five percent (25%) of the units will be offered to applicants on the community-wide (traditional family) wait list.
8. Pursuant to the RRC, leaseholders with a right of return will receive unit offers in accordance with the stipulations and requirements of the RRC.

I. Accessible Units

1. Pursuant to eligibility requirements, the CHA will offer available accessible units in the following order:
 - a. First, to a current qualified resident with a disability living in the same development that requires the special features of the vacant accessible unit and occupying a unit not having those accessibility features;
 - b. Second, to a current qualified resident with a disability residing in another development that requires the accessibility features of the vacant accessible unit;
 - c. Third, to an eligible, qualified applicant with disabilities on the wait list who requires the accessibility features; and
 - d. Fourth, to a non-disabled eligible applicant or resident. The CHA will require the applicant or resident to execute a lease addendum that requires them to move, at the CHA's expense, to a non-accessible unit within 30 calendar days of notice by the CHA if there is an eligible applicant or existing resident with disabilities who requires the accessibility features of the unit. **24 CFR § 8.27.**
2. The CHA shall not prohibit a qualified eligible, disabled family from accepting a non-accessible unit for which the family is eligible which may become available before an accessible unit. The CHA may modify a non-accessible unit as needed as a reasonable accommodation, unless the modification would result in an undue financial and/or an administrative burden.