

Streamlined Annual PHA Plan <i>(High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** - A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment, and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A.	PHA Information.				
A.1	PHA Name: <u>FRAMINGHAM HOUSING AUTHORITY</u> PHA Code: <u>MA028</u> PHA Type: <input type="checkbox"/> Small <input checked="" type="checkbox"/> High Performer PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/01/2017</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>235</u> Number of Housing Choice Vouchers (HCVs) <u>983</u> Total Combined <u>1248</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission				
<p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p>					
<input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)					
Participating PHAs		PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program
					PH HCV
Lead PHA:					

B.	Annual Plan Elements
B.1	<p>Revision of PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission? Y N</p> <ul style="list-style-type: none"> <input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs. <input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. <input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources. <input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination. <input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs. <input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention. <input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy. <input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation. <input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification <p>(b) The PHA must submit its Deconcentration Policy for Field Office Review.</p> <p>(c) If the PHA answered yes for any element, describe the revisions for each element below:</p> <p>SEE ATTACHMENT A - Financial Resorces ATTACHMENT B- updated Flat Rents</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N</p> <ul style="list-style-type: none"> <input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods. <input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development. <input type="checkbox"/> <input checked="" type="checkbox"/> Demolition and/or Disposition. <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance. <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD. <input type="checkbox"/> <input checked="" type="checkbox"/> Project Based Vouchers. <input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization. <input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p>
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p> <p>The Framingham Housing Authority strives to provide safe, sanitary and secure housing for its low and moderate income residents by efficiently utilizing its modernization monies by maintaining the units and property. With a limited amount of funding the work is prioritized according to preventative needs and goals set by the Director of Operations whose Modernization Department is educated in updated and continually changing regulations. The Authority has always maintained that the security of the units and residents as an important part of providing a good quality of life for its residents. Over twenty (20) years ago the Authority entered into a successful relationship with the Framingham Police Department providing an officer full time to work directly with the Deputy Executive Director in a Community Policing enviroment. A large decline in crimes on the property has proven the success of the program . Fraud, unauthorized occupants and violent crimes are some of the issues the program investigates.The Residents have become allies with police.</p>

B.4.	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p>See Attachment C- The Framingham Housing Authority is doing a constructive Work Plan with consultants to train and and update staff. The Work Plan will be submitted to HUD for approval.</p>
<p>Other Document and/or Certification Requirements</p>	
C.1	<p>Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan</p> <p>Form 50077-ST-HCV-HP, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.2	<p>Civil Rights Certification.</p> <p>Form 50077-ST-HCV-HP, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p>ATTACHMENT D</p>
C.4	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>D Statement of Capital Improvements. Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>	
D.1	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>On April 13, 2016 the FHA received approval of its five (5) year Capital Action Plan. The 2016 funding is in the amount of \$315237.00. SEE ATTACHMENT E</p> <p>In 2016 the Authority will complete installation of energy efficient electric heat in 110 elderly/disabled units. As preventive maintenance the roofs were replaced in four (4) more buildings on Brady Drive bringing the total of roofs complete ten (10).</p> <p>Completed seal coating and patching at our Mass 28-1 Family development.</p> <p>Two (2) sump Pumps were placed at Mass 28-1 and preventive maintenace was done of remaining do to high water table.</p> <p>In preparation the FHA has purchased two (2) complete kitchens with counter tops to be installed as needed</p>

Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing PHAs

A. PHA Information. All PHAs must complete this section.

- A.1 Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

B. Annual Plan.

B.1 Revision of PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no."

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA's public housing and Section 8 tenant-based assistance waiting lists. 24 CFR §903.7(a)(1) and 24 CFR §903.12(b). Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA's public housing and Section 8 tenant-based assistance waiting lists. 24 CFR §903.7(a)(2)(ii) and 24 CFR §903.12(b).

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions. Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. 24 CFR §903.7(b) Describe the PHA's procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. 24 CFR §903.7(b) A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b) Describe the unit assignment policies for public housing. 24 CFR §903.7(b)

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

Homeownership Programs. A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. (24 CFR §903.7(k) and 24 CFR §903.12(b).

Safety and Crime Prevention (VAWA). A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

Pet Policy. Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. Should the PHA fail to define "significant amendment/modification", HUD will consider the following to be "significant amendments or modifications": a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency public housing CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan); or c) any change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD's website at: Notice PIH 1999-51. (24 CFR §903.7(r)(2)(ii))

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements or discretionary policies in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

Hope VI. 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

Mixed Finance Modernization or Development. 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

Demolition and/or Disposition. Describe any public housing projects owned by the PHA and subject to ACCs (including name, project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

Conversion of Public Housing. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

Project-Based Vouchers. Describe any plans to use HCVs for new project-based vouchers. (24 CFR §983.57(b)(1)) If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

B.4 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

C. Other Document and/or Certification Requirements

C.1 Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 SM-HP.

C.2 Civil Rights Certification. Form HUD-50077 SM-HP, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o))

C.3 Resident Advisory Board (RAB) comments. If the RAB provided comments to the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

C.4 Certification by State or Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15)

D. Statement of Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR 903.7 (g))

D.1 Capital Improvements. In order to comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan. PHAs can reference the form by including the following language in Section C. 8.0 of the PHA Plan Template: "See HUD Form 50075.2 approved by HUD on XX/XX/XXXX."

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 16.64 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq, and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

**ALL INFORMATION INCLUDED IN THE 2017 PHA PLAN IS
AVAILABLE AT THE ADMINISTRATION OFFICE AT 1 JOHN J.
BRADY DRIVE, FRAMINGHAM, MASS 01702**

ATTACHMENT A

ATTACHMENT - A

Financial Resources

<u>Source</u>	<u>Planned</u>	<u>Fed</u>	<u>VP</u>	<u>Total</u>
<u>1. Federal Grants (FY 2016)</u>				
a) Public Housing Operating Fund	893,721	893,721	0	893,721
b) Public Housing Capital Fund	270,389	270,389	0	270,389
c) Annual HAP Contributions for Sec 8	10,284,698	0	10,284,698	10,284,698
d) Annual Admin Contributions for Sec 8	982,942	0	982,942	982,942
e) Ross Grants-A013	66,970	66,970	0	66,970
e) Ross Grants-A014	82,000	82,000	0	82,000
<u>2. Prior Year Federal Grants (unobligated funds only)</u>				
a. 2015 (CFP Grant MA06-P028-501-15)	49,167	49,167		49,167
b. 2016 (CFP Grant MA06-P028-501-16)	219,819	219,819		219,819
<u>3. Public Housing Dwelling Rental Income</u>	1,258,780	1,258,780	0	1,258,780
<u>4. Other Income</u>				
a. Interest from Operations	13,420	13,356	64	13,420
b. Fraud Recovery	0	0	0	0
c. Other	17,659	17,659	0	17,659
<u>Total Resources</u>	<u>14,139,565</u>	<u>2,871,861</u>	<u>11,267,704</u>	<u>14,139,565</u>

ATTACHMENT B

Flat Rent VS Income-Based Rent

This new Flat Rent is effective March 1, 2016.

Flat Rent: The Flat rent is based on the market rent charges for comparable unit in the private unassisted rental market.

Income-Based Rent: An income based rent is a tenant rent that is based on the family income and the PHA's rent policies for determination of such rents.

The Framingham Housing Authority has determined the flat rent to be:

MASS 28-1 New Applicants: (Electric Utility allowance deducted from Flat Rent)

1BR	2BR	3BR	4BR
\$1,213	\$1,505	\$1,878	\$2,075

MASS 28-2 ALL UTILITIES INCLUDED

1BR	2BR
\$1,261	\$1,567

ATTACHMENT C

The Framingham Housing Authority will be submitting a work plan to the HUD regional Office addressing the Three (3) findings in the Audit year ending December 31, 2015. The three (3) findings have been addressed and the FHA will await HUDS approval of work plan as we go forward.

Beth O'Grady

From: Emanuelson, Gordon <gordon.emanuelson@hud.gov>
Sent: Thursday, September 22, 2016 8:02 AM
To: Beth O'Grady; Stephen Keane
Cc: Cwieka, Robert P; O'Brien, Maura; O'Sullivan, Marilyn B; Turner, Valarie L
Subject: Framingham HA - Audit Report 12/31/2015
Attachments: Framingham_12.31.2015_MD.pdf; MA028_Audit Findings_12.31.2015.pdf; MA028_Management Letter_12.31.2015.pdf

Mr. Stephen Keane, Executive Director:

We have reviewed the audited financial statements of the Framingham Housing Authority (FHA) prepared by Guyder Hurley, P.C. for the fiscal year ending December 31, 2015. There are three current year audit findings in the report which require corrective action. Also, the report identified one prior year finding that the Auditors consider closed. In addition, the management letter discloses certain matters from the current year that need improvement. You will find a copy of this information attached for your convenience.

FYI: This audit finding for the FYE 12/31/2015 directly impacts your Section Eight Management Assessment Program (SEMAP) score for the FYE 12/31/2015. Consequently, your performance rating requires modification.

Would you please review the information presented in this letter along with the enclosures. Then, send a written status report regarding each recommendation to Marilyn O'Sullivan by October 31, 2016. It is necessary you include in your response the target dates you anticipate completion of the corrective actions.

Gordon Emanuelson, Financial Analyst
U.S. Dept. of HUD
Boston HUB, PIH
Thomas P. O'Neill, Jr. Federal Building
10 Causeway St., Rm 553
Boston, MA 02222-1092

Work: 617-994-8442
gordon.emanuelson@hud.gov



New England

U.S. Department of Housing and Urban Development

Office of Public Housing
Boston Hub
Thomas P. O'Neill, Jr. Federal Building
10 Causeway Street
Boston, Massachusetts 02222-1092

Mr. Stephen Keane
Executive Director
Framingham Housing Authority
1 John J. Brady Drive
Framingham, MA 01702-2307

SEP 21 2016

Dear Mr. Keane:

We have reviewed the audited financial statements of the Framingham Housing Authority (FHA) prepared by Guyder Hurley, P.C. for the fiscal year ending December 31, 2015. There are three current year audit findings in the report which require corrective action. Also, the report identified one prior year finding that the Auditors consider closed. In addition, the management letter discloses certain matters from the current year that need improvement. You will find a copy of this information attached for your convenience.

Finding 2015-001 - Internal Controls over Financial Reporting

The Authority's control activities were not sufficient throughout the entirety of the fiscal year to prevent or detect fraud in a timely manner.

Management and those charged with governance have a responsibility to understand the five components of internal control and design either formal or informal systems that address each component sufficiently relative to the size and complexity of the organization in such a way that reduces the risk that financial statements will be materially misstated or that laws and the risk of noncompliance with regulations relating to the administration of government programs and grants to a relatively low level.

Recommendations

The Authority has taken corrective action as of the date of this report, we have no additional recommendations.

Auditee's Response

The Framingham Housing Authority has reviewed and updated the agency's Fraud Policy on 1/11/2016 while also implementing a new detailed internal control and cash policy on 2/18/2016. These policy's shall significantly reduce the risk of errors and fraud creating additional procedures, oversight and segregation of duty's. **Expected completion date of corrective action:** February 28, 2016.

Finding 2015-002 – Eligibility: Rent Calculation

The Firm examined a sample of tenant files for the HCV program and tested for various program compliance requirements, including eligibility and other special tests and provisions. Of the files tested, we noted the following:

- Three (3) instances of incorrect payment standards implemented;
- Seven (7) instances of missing, insufficient or incorrect income verifications and calculations, and;
- Seven (7) instances of missing Declaration of Section 214 Status forms and biological documentation.

Impacts of Finding

You will find this information in Attachment A.

Recommendation

It is recommended that the Authority carefully follow HUD's rules and regulations on the calculation of rent and the gathering of income verifications as stated in Notice PIH 2010-19. It is also recommended that if the Authority needs to establish an exception to their payment standard schedule as a reasonable accommodation to use current fair market rents, unless the payment standard has decreased (24 CFR 982.505 (c)). Lastly, the Authority should highly consider housing trainings that focus on administering the Housing Choice Voucher Program.

Auditee's Response

The Authority shall carefully follow HUD's rules and regulations on the calculation of rent and the gathering of income verifications as stated in Notice PIH 2010-19. The Auditor has also recommended that if the Authority needs to establish an exception to their payment standard schedule as a reasonable accommodation to use current fair market rents, unless the payment standard has decreased (24 CFR 982.505 (c)). We shall follow this recommendation. The FHA has scheduled Nan McKay rent calculation training on October 18-19, 2016 for staff. We are in the process of completing an internal audit with a consultant and shall implement complete ongoing, sampling, monitoring and oversight of the Section 8 Department. The Department Director shall be required to be certified and implement staff training in program administration so we may further administer the program under the regulations. The Consultants review shall result in a progressive work plan for the Section 8 Director and staff and monthly monitoring for 12 months to ensure compliance. **Expected completion date of corrective action: September 30, 2016.**

Finding 2015-003 - Other: Lease

The Authority did not maintain and/or require landlords and HCV participants to enter into legal lease agreements.

Recommendation

It is recommended that the Authority promptly rectify this issue with the assistance of the Authority's HUD Field Representative.

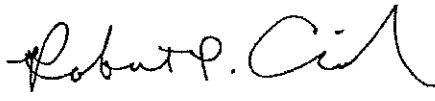
Auditee's Response

It has been recommended by the auditor that the Authority promptly rectify this Lease & HAP Contract violations with the assistance of the Authority's HUD Field Representative. The Housing Authority shall follow this recommendation with input from our current ongoing consultants audit recommendations which will be completed in 30 days. We are in the process of completing an internal audit with the consultant and once completed shall implement ongoing, sampling, monitoring and oversight of the Section 8 Department to resolve this and any other issues noted in the consultant's summary report. The Department Director shall be required to be certified and implement staff training in program administration so we may further administer the program under the regulations. The Consultants review shall result in a progressive work plan for the Section 8 Director and staff which shall include monthly monitoring for 12 months to ensure compliance. **Expected completion date of corrective action: September 30, 2016**

Would you please review the information presented in this letter. Then, send a written status report regarding each recommendation to Marilyn O'Sullivan by October 31, 2016. It is necessary you include in your response the target date you anticipate completion of the corrective actions.

If you have any questions regarding this matter please call or email Gordon Emanuelson, at (617)994-8442, gordon.emanuelson@hud.gov, or Robert Cwieka, at (617)994-8418, robert.p.cwieka@hud.gov.

Sincerely yours,


for Marilyn B. O'Sullivan
Director

Enclosures

ATTACHMENT D

RESIDENT MEETING

JULY 27, 2016

Present: Beth O'Grady
Deputy Executive Director

Paul Landers
Deputy Director of Operations

Tenants: Sharon Allen
4 D Carlson Rd

Kelly Fegan
24 D Carlson Rd

We met with residents- they were very pleased with the new camera system installed and felt this has eliminated a lot of issues. Told them we would be improving the lighting. Work on updating sump pumps- Basically the development is in good shape.

RESIDENT BOARD MEETING TO REVIEW 2017 ANNUAL PHA PLAN

PRESENT- Beth O'Grady
Deputy Executive Director

Pat Nutting
President
20 H John J. Brady Drive

Deborah Lakin
Treasurer
16 D John J. Brady Drive

The Members of Brady Dr association reviewed the 2017 Draft of the PHA plan- I informed them it would be available to all after the August 8, 2016 Board Meeting. I provided them a copy and all updated policies and inquired if any questions.

We also discussed the capital plan and the utilization of the monies. They stated all were happy with the roofs and the new heat.

They were encouraged to submit any comments in writing.

The Public Hearing is scheduled for October 12, 2016.



ATTACHMENT E U.S. Department of Housing and Urban Development

New England

Office of Public Housing
Boston Hub
Thomas P. O'Neill, Jr. Federal Building
10 Causeway Street
Boston, Massachusetts 02222-1092

April 13, 2016

Mr. Stephen Keane
Executive Director
Framingham Housing Authority
1 John J. Brady Drive
Framingham, MA 01702-2307

Dear Mr. Keane:

This letter is to inform you that the Framingham Housing Authority's (FHA's) 5 Year Capital Action Plan (form HUD-50075.2) submitted with Capital Fund Program (CFP) Amendment to the Consolidated Annual Contributions Contract form HUD-52840-A which provided increased funding under grant number MA01P02850116 is **approved effective 4/13/2016**. This 5 Year Capital Action Plan covers identified Physical and Management needs at (FHA) for Fiscal Years 2015-2019.

Please be advised that your approved 5 Year Capital Action Plan and all required attachments and documents must be made available for review and inspection at the principal office of the FHA during normal business hours. The Framingham Housing Authority may use any available CFP assistance to fund identified work items in the approved 5 Year Capital Action Plan. Should another need arise, the FHA is reminded to amend their 5 Year Capital Action Plan in accordance with their Definition of Significant Amendment and consultation with the Resident Advisory Board (RAB) after 45 days written notice, per public hearing requirements.

If you have any questions please contact Mike Coughlin of my staff at (617) 994-8441.

Very sincerely yours,

Marilyn B. O'Sullivan
Director



New England

U.S. Department of Housing and Urban Development

Office of Public Housing
Boston Hub
Thomas P. O'Neill, Jr. Federal Building
10 Causeway Street
Boston, Massachusetts 02222-1092

April 13, 2016

Mr. Stephen Keane
Executive Director
Framingham Housing Authority
1 John J. Brady Drive
Framingham, MA 01702-2307

Dear Mr. Keane:

Enclosed for your files is a copy of a fully executed Capital Fund Program (CFP) Amendment to the Consolidated Annual Contributions Contract form HUD-52840-A which provides increased funding under grant number: MA01P02850116.

PHAs are reminded of the requirement to submit an environmental review (ER) for the FY 2016 CFP prior to the release of funds. The ER should be completed by the Responsible Entity (RE) in accordance with 24 CFR 58. It is recommended that you consult with your local planning office for assistance in completing the Part 58 environmental review. Please refer to HUD's Environmental Review Requirements found at: <https://www.hudexchange.info/environmental-review/>. After an environmental determination is made, the budget line items will be entered into the Line of Credit Control System (LOCCS), consistent with the Annual Statement included in the application. The Framingham Housing Authority (FHA) would then be authorized to undertake the modernization activities set forth in a program budget consistent with your application.

Please be advised that all of the Framingham Housing Authority's CFP assistance for this grant is considered available for the purposes of statutory obligation and expenditure time periods as of the obligation start date on this CFP amendment.

If you have any questions please contact Mike Coughlin of my staff at (617) 994-8441.

Very sincerely yours,

A handwritten signature in black ink, appearing to read "Marilyn B. O'Sullivan".

Marilyn B. O'Sullivan
Director

Enclosure

2016 Capital Fund

Capital Fund Program
(CFP) Amendment
To The Consolidated Annual Contributions
Contract (form HUD-53012)

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

Whereas, (Public Housing Authority) Framingham Housing Authority MA028 (herein called the "PHA")
and the United States of America, Secretary of Housing and Urban Development (herein called "HUD") entered into Consolidated Annual Contributions
Contract(s) ACC(s) Number(s) B-53 dated 1/10/1996

Whereas, HUD has agreed to provide CFP assistance, upon execution of this Amendment, to the PHA in the amount to be specified below for the
purpose of assisting the PHA in carrying out development, capital and management activities at existing public housing projects in order to ensure that
such projects continue to be available to serve low-income families. HUD reserves the right to provide additional CFP assistance in this FY to the
PHA. HUD will provide a revised ACC Amendment authorizing such additional amounts.

\$ \$315,237.00 for Fiscal Year 2016 to be referred to under Capital Fund Grant Number MA01P02850116
PHA Tax Identification Number (TIN): On File DUNS Number: On File

Whereas, HUD and the PHA are entering into the CFP Amendment Number 46

Now Therefore, the ACC(s) is (are) amended as follows:

- The ACC(s) is (are) amended to provide CFP assistance in the amount specified above for development, capital and management activities of PHA projects. This CFP Amendment is a part of the ACC(s).
- The PHA must carry out all development, capital and management activities in accordance with the United States Housing Act of 1937 (the Act), 24 CFR Part 905 (the Capital Fund Final rule) published at 78 Fed. Reg. 63748 (October 24, 2013), as well as other applicable HUD requirements, except that the limitation in section 9(g)(1) of the Act is increased such that of the amount of CFP assistance provided for under this CFP amendment only, the PHA may use no more than 25 percent for activities that are eligible under section 9(e) of the Act only if the PHA's HUD-approved Five Year Action Plan provides for such use; however, if the PHA owns or operates less than 250 public housing dwelling units, such PHA may continue to use the full flexibility in section 9(g)(2) of the Act.
- The PHA has a HUD-approved Capital Fund Five Year Action Plan and has complied with the requirements for reporting on open grants through the Performance and Evaluation Report. The PHA must comply with 24 CFR 905.300 of the Capital Fund Final rule regarding amendment of the Five Year Action Plan where the PHA proposes a Significant Amendment to the Capital Fund Five Year Action Plan.
- For cases where HUD has approved a Capital Fund Financing Amendment to the ACC, HUD will deduct the payment for amortization scheduled payments from the grant immediately on the effective date of this CFP Amendment. The payment of CFP funds due per the amortization scheduled will be made directly to a designated trustee within 3 days of the due date.
- Unless otherwise provided, the 24 month time period in which the PHA must obligate this CFP assistance pursuant to section 9(i)(1) of the Act and 48 month time period in which the PHA must expend this CFP assistance pursuant to section 9(i)(5) of the Act starts with the effective date of this CFP amendment (the date on which CFP assistance becomes available to the PHA for obligation). Any additional CFP assistance this FY will start with the same effective date.
- Subject to the provisions of the ACC(s) and paragraph 3, and to assist in development, capital and management activities, HUD agrees to disburse to the PHA or the designated trustee from time to time as needed up to the amount of the funding assistance specified herein.
- The PHA shall continue to operate each public housing project as low-income housing in compliance with the ACC(s), as amended, the Act and all HUD regulations for a period of twenty years after the last disbursement of CFP assistance for modernization activities for each public housing project or portion thereof and for a period of forty years after the last distribution of CFP

assistance for development activities for each public housing project and for a period of ten years following the last payment of assistance from the Operating Fund to each public housing project. However, the provisions of Section 7 of the ACC shall remain in effect for so long as HUD determines there is any outstanding indebtedness of the PHA to HUD which arose in connection with any public housing project(s) under the ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition of any project covered by this amendment shall occur unless approved by HUD.

8. The PHA will accept all CFP assistance provided for this FY. If the PHA does not comply with any of its obligations under this CFP Amendment and does not have its Annual PHA Plan approved within the period specified by HUD, HUD shall impose such penalties or take such remedial action as provided by law. HUD may direct the PHA to terminate all work described in the Capital Fund Annual Statement of the Annual PHA Plan. In such case, the PHA shall only incur additional costs with HUD approval.

9. Implementation or use of funding assistance provided under this CFP Amendment is subject to the attached corrective action order(s).
(mark one): Yes No

10. The PHA is required to report in the format and frequency established by HUD on all open Capital Fund grants awarded, including information on the installation of energy conservation measures.

11. If CFP assistance is provided for activities authorized pursuant to agreements between HUD and the PHA under the Rental Assistance Demonstration Program, the PHA shall follow such applicable statutory authorities and all applicable HUD regulations and requirements.
For total conversion of public housing projects, the provisions of Section 7 of the ACC shall remain in effect for so long as HUD determines there is any outstanding indebtedness of the PHA to HUD which arose in connection with any public housing projects(s) under the ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition or conversion of any public housing project covered by these terms and conditions shall occur unless approved by HUD. For partial conversion, the PHA shall continue to operate each non-converted public housing project as low-income housing in accordance with paragraph 7.

12. CFP assistance provided as an Emergency grant or a Safety and Security grant shall be subject to a 12 month obligation and 24 month expenditure time period. CFP assistance provided as a Natural Disaster grant shall be subject to a 24 month obligation and 48 month expenditure time period. The start date shall be the date on which such funding becomes available to the PHA for obligation. The PHA must record the Declaration(s) of Trust within 60 days of the effective date or HUD will recapture the funds.

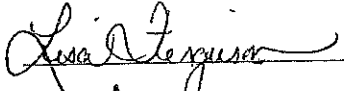
The parties have executed this CFP Amendment, and it will be effective on 4/13/2016. This is the date on which CFP assistance becomes available to the PHA for obligation.

U.S. Department of Housing and Urban Development
By Marilyn B. O'Sullivan Date: 4/13/16
Title **Director**

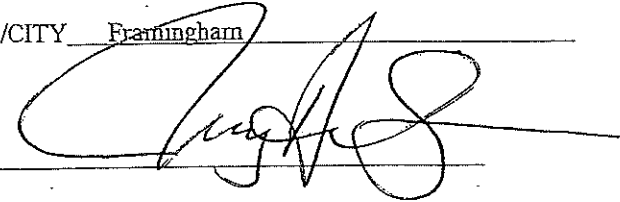
PHA (Executive Director or authorized agent)
By Steph L. Keane Date: 2/29/2016
Title **Executive Director**

Capital Fund Program
(CFP) Amendment—page 2
To The Consolidated Annual Contributions Contract
(form HUD-53012)

(SEAL)
Attest:


Asst. Town Clerk

TOWN/CITY Frammingham

BY: 

TITLE: Town Manager

DATE: 2/29/16

ATTACHMENT F

List of 2016 Policies

<u>Policy Name</u>	<u>Date Approved</u>
IPM (Integrated Pest Management)	9/12/16
Capitalization Policy	2/18/16
Public Housing Flat Rents	2/18/16
Workers Compensation Policy & Procedures	2/18/16
Travel Policy	2/18/16
OBRA Policy (Omnibus Budget Reconciliation Act)	2/18/16
Federal Section 8 Admin Plan Update	2/18/16 and 10/12/2016
ACOP (Admissions & Continued Occupancy Plan) update	2/18/16 and 10/12/2016
Re-edited Internal Control Policy	2/18/16
Family Medical Leave Act policy (FMLA)	2/18/16
Fraud Policy	1/11/16
Vehicle Policy	1/11/16
Procurement Policy	1/11/16
Amendment to Non Smoking Policy 25Ft from building	9/12/16

ATTACHMENT G

February 8, 2016

DEFINIITION OF SIGNIFICANT AMENDMENT/ MODIFICATION

The Framingham Housing Authority considers one or more of the following to be a significant amendment or modification to the CFP 5- year action plan:

- 1) A change in any open annual capital fund program that modifies or changes the work items by greater than 20% of the total grant amount
- 2) Any proposed demolition, disposition, homeownership, Capital Fund financing, development, or mixed finance proposals
- 3) Any major reduction in funding (>20%) from HUD or CFP

**Certifications of Compliance with
PHA Plans and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 02/29/2016

**PHA Certifications of Compliance with the PHA Plan and Related Regulations including
Required Civil Rights Certifications**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ___ 5-Year and/or X Annual PHA Plan for the PHA fiscal year beginning 1/1/2017 hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

13. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
14. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

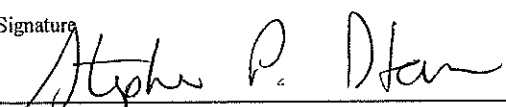
Framingham Housing Authority
PHA Name

MA0028
PHA Number/HA Code

Annual PHA Plan for Fiscal Year 20 17

5-Year PHA Plan for Fiscal Years 20____ - 20____

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Authorized Official Stephen P. Starr	Title Chairman
Signature 	Date 10/12/16

**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 2/29/2016

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Robert Halpin, the Town Manager
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

Framingham Housing Authority

PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of

Impediments (AI) to Fair Housing Choice of the

Town of Framingham

Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State
Consolidated Plan and the AI.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Robert Halpin

Title

Town Manager

Signature

Date

10/4/16