

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
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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, including changes to these policies, 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. The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs** or **TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only 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 the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** – A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 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 exceed 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.
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A.1	PHA Name: <u>Housing Authority of the County of Contra Costa</u> PHA Code: <u>CA011</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>4/2025</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>963</u> Number of Housing Choice Vouchers (HCVs) <u>9562</u> Total Combined Units/Vouchers <u>10,525</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission
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Availability of Information. 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. 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.

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.	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input type="checkbox"/> Operation and Management.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Grievance Procedures.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input type="checkbox"/> Substantial Deviation.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>See Attachment B.1.</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</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?</p> <p>Y N</p> <p><input type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input type="checkbox"/> <input type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input type="checkbox"/> Occupancy by Police Officers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Non-Smoking Policies.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers.</p> <p><input type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>See Attachment B.2.</p> <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 and Annual Plan.</p> <p>See Attachment B.3.</p>

B.4	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>See Attachment B.4.</p>
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C. Other Document and/or Certification Requirements.</p>	
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>See Attachment C.1.</p> <p>(b) 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>
C.2	<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>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
C.5	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>

D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <div data-bbox="203 642 1463 1150" style="border: 1px solid black; padding: 5px;"> <p>Fair Housing Goal: <u>Describe fair housing strategies and actions to achieve the goal</u></p> <p>1. Reduce discriminatory barriers to residential mobility.</p> <ul style="list-style-type: none"> i. Work to ban discrimination in housing on the basis of source of income, including receipt of a Housing Choice Voucher, in the unincorporated areas of the County and in the Cities of Antioch, Concord, Pittsburg, and Walnut Creek. Develop and disseminate a model ordinance for adoption by other municipalities throughout the County. ii. Encourage local block grants or other funding for a security deposit fund to incentivize landlords to rent to voucher holders. </div> <div data-bbox="203 1178 1463 1612" style="border: 1px solid black; padding: 5px;"> <p>Fair Housing Goal: <u>Describe fair housing strategies and actions to achieve the goal</u></p> <p>2. Increase residential racial and ethnic integration by increasing the supply of affirmatively marketed affordable housing for families in high opportunity areas.</p> <ul style="list-style-type: none"> i. Target the use of Project-Based Vouchers and RAD Transfers of assistance in designated opportunity areas with low poverty rates, healthy neighborhoods and high performing schools. ii. Explore pooling of Project-Based Vouchers across Contra Costa County </div> <div data-bbox="203 1640 1463 1680" style="border: 1px solid black; padding: 5px;"> <p>Fair Housing Goal:</p> </div>

Describe fair housing strategies and actions to achieve the goal

3. Increase and Stabilize access to proficient Schools

- i. Create regular lines of communications between housing boards and staff with county and district school boards and school district staff to ensure that districts take into account the needs of low income residents in redistricting and investment decisions, particularly for residents of public housing and assisted housing in the region.**
- ii. To the extent possible, focus the development of new family affordable housing in school districts and school zones with lower rates of school-based poverty concentration and require new market rate multifamily development in high performing school zones to include larger affordable apartments for families with children.**

Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

- 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. Plan Elements. All PHAs must complete this section.

B.1 Revision of Existing 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." (24 CFR §903.7)

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 and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. 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 (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. 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)) 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 maintain 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))
- Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))
- Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))
- Homeownership Programs.** A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))
- Community Service and Self Sufficiency Programs.** Describe how the PHA will comply with the requirements of (24 CFR §903.7(l)). Provide a description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))
- Safety and Crime Prevention (VAWA).** Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) 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))
- Asset Management.** State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))
- 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. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

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 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 or Choice Neighborhoods.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. (Notice PIH 2011-47)
- Mixed Finance Modernization or Development.** 1) A description of any housing (including 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: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4
- Demolition and/or Disposition.** With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including 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 approval under section 18 of the 1937 Act (42 U.S.C. 1437p); 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 as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and

approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

Designated Housing for Elderly and Disabled Families. Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, 5) the number of units affected and; 6) expiration date of the designation of any HUD approved plan. **Note:** The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. 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))

Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

Occupancy by Over-Income Families. A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7.](#) (24 CFR 960.503) (24 CFR 903.7(b))

Occupancy by Police Officers. The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7.](#) (24 CFR 960.505) (24 CFR 903.7(b))

Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21](#) and [Notice PIH-2017-03.](#) (24 CFR §903.7(e))

Project-Based Vouchers. Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. 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 (24 CFR §903.7(b)).

Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with 24 CFR §990.145(a)(1).

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

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

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 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section (24 CFR §903.7(g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

B.5 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 Resident Advisory Board (RAB) comments. If the RAB had comments on 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.2 Certification by State of 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). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ 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 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* 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 certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations, 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.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) ... Strategies and actions must affirmatively further fair housing" Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

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.

Public reporting burden for this information collection is estimated to average 7.52 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.

Attachment B.1

Summary of ACOP Changes

- Chapter 2 – Reasonable Accommodation – Updates to our Reasonable Accommodation forms, processes and procedures.
- Chapter 10 – Changes in Pet Fees and Deposits:
 - Previously we had a \$100 non-refundable pet fee and a \$150 refundable pet deposit.
 - 10-III.B. We are removing the \$100 non-refundable pet fee and increasing the pet deposit to a flat amount of \$250 that can be broken down into payments.
 - 10-III.C. Increasing Pet Waste Removal waste from \$10 to \$25
 - These changes will reflect in our new pet policy and pet request forms.
- Chapter 16 – Corrections made to the VAWA exhibits 16-1 and 16-3.
 - Change from “sample” notice to “notice” and replace PH (public housing) to HACCC.

PART III: PET DEPOSITS AND FEES IN ELDERLY/DISABLED DEVELOPMENTS

10-III.A. OVERVIEW

This part describes HACCC's policies for pet deposits and fees in elderly, disabled and mixed population developments. Policies governing deposits and fees in general occupancy developments are described in Part IV.

10-III.B. PET DEPOSITS

Payment of Deposit

HACCC may require tenants who own or keep pets in their units to pay a refundable pet deposit. This deposit is in addition to any other financial obligation generally imposed on tenants of the project [24 CFR 5.318(d)(1)].

The maximum amount of pet deposit that may be charged by HACCC on a per dwelling unit basis, is the higher of the total tenant payment (TTP) or such reasonable fixed amount as HACCC may require. HACCC may permit gradual accumulation of the pet deposit by the pet owner [24 CFR 5.318(d)(3)].

The pet deposit is not part of the rent payable by the resident [24 CFR 5.318(d)(5)].

HACCC Policy

Pet owners are required to pay a pet deposit in addition to any other required deposits. The amount of the deposit is the higher of the family's total tenant payment or \$50.00, and must be paid in full before the pet is brought on the premises. will be \$250. At the time HACCC approves the pet, residents may elect to pay the full amount or pay \$100 up front with (3) additional monthly installments of \$50. Should the resident default in any payment, the agreement will be null and void and all monies owing will be due.

Refund of Deposit [24 CFR 5.318(d)(1)]

HACCC may use the pet deposit only to pay reasonable expenses directly attributable to the presence of the pet, including (but not limited to) the costs of repairs and replacements to, and fumigation of, the tenant's dwelling unit. HACCC must refund the unused portion of the pet deposit to the tenant within a reasonable time after the tenant moves from the project or no longer owns or keeps a pet in the unit.

HACCC Policy

HACCC will refund the pet deposit to the resident, less the costs of any damages caused by the pet to the dwelling unit, within 21 days of move-out or removal of the pet from the unit.

The resident will be billed for any amount that exceeds the pet deposit.

HACCC will provide the resident with a written list of any charges against the pet deposit within 14 calendar days of the move-out inspection. If the resident disagrees with the amount charged to the pet deposit, HACCC will provide a meeting to discuss the charges.

10-III.C. OTHER CHARGES

Pet-Related Damages During Occupancy

HACCC Policy

All reasonable expenses incurred by HACCC as a result of damages directly attributable to the presence of the pet in the project will be the responsibility of the resident, including:

The cost of repairs and replacements to the resident's dwelling unit

Fumigation of the dwelling unit

Repairs to common areas of the project

The expense of flea elimination shall also be the responsibility of the resident.

If the resident is in occupancy when such costs occur, the resident shall be billed for such costs in accordance with the policies in Section 8-I.G, Maintenance and Damage Charges. Pet deposits will not be applied to the costs of pet-related damages during occupancy.

Charges for pet-related damage are not part of rent payable by the resident.

Pet Waste Removal Charge

The regulations do not address HACCC's ability to impose charges for house pet rule violations. However, charges for violation of HACCC pet rules may be treated like charges for other violations of the lease and HACCC tenancy rules.

HACCC Policy

A separate pet waste removal charge of ~~\$10~~\$25.00 per occurrence will be assessed against pet owners who fail to remove pet waste in accordance with this policy.

Notices of pet waste removal charges will be in accordance with requirements regarding notices of adverse action. Charges are due and payable 14 calendar days after billing. If the family requests a grievance hearing within the required timeframe, HACCC may not take action for nonpayment of the charge until the conclusion of the grievance process.

Charges for pet waste removal are not part of rent payable by the resident.

Attachment B.1.

Summary of December, 2024 Administrative Plan Changes

In addition to any grammatical changes, edits were made to the standard HUD language in the plan that introduces the subject matter. These are not policy changes but regulatory edits from the Code of Federal Regulations. The following substantial changes were made to the Housing Choice Voucher Program Administrative Plan as it pertains to HACCC Policy:

- In 2023, the Administrative Plan was updated to incorporate all HOTMA Section 102 and 104 changes. Since then, HUD has suspended implementation of some changes until January, 2026. Accordingly, language has been added to temporarily restore language from the Administrative Plan approved 12/13/2022 pending implementation of HOTMA changes pursuant to HUD's implantation date.
- Modified the language in the Administrative Plan regarding when revisions to the Payment Standard are effective after HUD releases new Fair Market Rents
- Added language that the Payment Standard will be changed at the family's next Interim or Annual Reexamination that has an effective date on or after the effective date of the revised Payment Standard.
- Made changes to the Admin Plan language regarding when Interim Certifications are completed to reflect that all reported changes in income or household composition will result in an Interim Certification being completed regardless of whether it meets the HUD \$200 threshold indicated in the new HOTMA changes.
- Added language that states if the payment standards increase and the family's Annual reexamination has been completed with the previous payment standard with an effective date on or after the release of the new Fair Market Rents by HUD, then HACCC shall determine if the family is now rent burdened and process an Interim to apply the new Payment Standard.
- Added language to clarify the Project-Based Voucher Vacancy Loss policy. Added specific language about how to calculate the vacancy period and when and under what circumstances the family's security deposit is deducted from the vacancy loss calculation.
- Removed language that stated HACCC would administer a separate waiting list for the Mainstream Program.
- Added language to the Administrative Plan that incorporates mandatory waivers approved for all Mainstream Program participants. Specifically, that initial vouchers would be issued for 120 Days and any voucher extensions would be for a minimum of 90 days.

INTRODUCTION

HOTMA CHANGES IN THE ADMINISTRATIVE PLAN

On July 29, 2016, the Housing Opportunity Through Modernization Act of 2016 (HOTMA) was signed into law. HOTMA made numerous changes to statutes governing HUD programs, including sections of the United States Housing Act of 1937. Title I of HOTMA contains 14 different sections that impact the public housing and Section 8 programs.

HOTMA 102/104

HUD published a final rule on February 14, 2023, revising regulations related to income, assets, adjusted income, verification, and reexams (among others) to implement Sections 102 and 104 of HOTMA. While the new regulations were effective January 1, 2024, HUD has delayed the compliance date for HOTMA 102/104. Initially, HUD published a delayed compliance date of January 1, 2025, but HUD again delayed the compliance date for HOTMA 102/104 and no new date has been provided. Compliance with Sections 102 and 104 of HOTMA means not only applying HOTMA 102/104 regulations to affected programs but also reporting in HUD's new Housing Information Portal (HIP) system. Currently, PHAs remain unable to comply with HOTMA 102/104 because compliance depends on transitioning from HUD's IMS/PIC system (which is unable to accept HOTMA-compliant Form HUD-50058) to HUD's new HIP system (which will be the only system that accepts HOTMA-compliant Form HUD-50058). PHAs cannot transition to HOTMA until HIP is in place, HOTMA-compliant, and accessible. However, HUD has determined that a few HOTMA 102/104 policies are not dependent on transition systems and easily isolated from other HOTMA 102/104 policy changes. These policies may be implemented prior to the migration to HIP.

HUD stated that PHAs may update their policy documents before determining the date at which they will transition to all HOTMA Section 102 and 104 policies. HUD stated that in order to update their policy documents for HOTMA in this circumstance, PHAs may create an appendix that contains the HOTMA policies that will be incorporated at a later date. The model policy adopts such an approach. HOTMA 102/104 policies are provided in each affected area of the model policy. However, with the exception of the policies HUD has indicated may be adopted early, HOTMA policies that are "on hold" are indicated in the model policy as such. Further, an appendix has been provided to explicitly call out those policies that are on hold.

HOTMA VOUCHER FINAL RULE

The final rule implementing streamlining changes to the HCV and PBV programs was published on May 7, 2024, and codified certain provisions in Sections 101, 105, 106, and 112 of HOTMA, as well as incorporating changes from the NSPIRE final rule discussed above. The rule is known as the “HOTMA voucher final rule.” The effective date of the HOTMA voucher final rule was June 6, 2024. While the compliance date for certain provisions of the rule is the same as the effective date, the compliance date for other provisions is not until 90 days, 180 days, or one year after the effective date. Further, many new changes to the regulations described in the HOTMA voucher final rule require changes to the PHA’s administrative plan. PHAs must make all revisions needed to bring existing policies into compliance with the final rule no later than June 6, 2025 (one year after the effective date). However, if a PHA wishes to use program flexibilities requiring adoption of new local policies not already present in the PHA’s administrative plan, the PHA must add those policies to the administrative plan prior to using those program flexibilities.

Further, the delayed compliance date for policies of June 6, 2025, does not authorize delayed compliance with the provisions of the rule. PHAs that choose not to bring their policies into compliance with the rule until June 6, 2025, must still implement each provision on its compliance date.

In order to identify those provisions of the final rule that are not effective until after June 6, 2024, the model policy states that certain policies are not effective until a specific date.

Prior to the HOTMA 102/104 compliance date, the HACCC will follow policies as outlined in the Pre-HOTMA-Updated Administrative Plan approved 12/13/2022.

ABOUT THE ADMINISTRATIVE PLAN

REFERENCES CITED IN THE ADMINISTRATIVE PLAN

The authority for PHA policies is derived from many sources. Primary among these sources are federal statutes, federal regulations, and guidance issued by HUD. State law also directs PHA policy. State law must be followed where such law exists and does not conflict with federal regulations. Industry practice may also be used to develop policy as long as it does not conflict with federal requirements or prohibitions.

HUD

HUD provides the primary source of PHA policy through federal regulations, HUD notices, and handbooks. Compliance with federal regulations, current HUD notices, and current HUD handbooks is mandatory.

HUD also provides guidance to PHAs through other means such as HUD-published guidebooks, expired HUD notices, and expired handbooks. Basing PHA policy on HUD guidance is optional, as long as PHA policies comply with federal law, federal regulations and mandatory policy. Because HUD has already determined that the guidance it provides is consistent with mandatory policies, PHA reliance on HUD guidance provides the PHA with a “safe harbor.”

Material posted on the HUD website can provide further clarification of HUD policies. For example, FAQs on the HUD website can provide direction on the application of federal regulations in various aspects of the program.

State Law

Where there is no mandatory federal guidance, PHAs must comply with state law, if it exists. Where state law is more restrictive than federal law, but does not conflict with it, the PHA should follow the state law.

Industry Practice

Where no law or HUD authority exists on a particular subject, industry practice may support PHA policy. Industry practice refers to a way of doing things or a policy that has been adopted by a majority of PHAs.

NSPIRE AND HQS IN THE ADMINISTRATIVE PLAN

The PHA must determine that the rental unit selected by the family is in safe and habitable condition at certain times prescribed by the regulations. The current applicable inspection standard for the HCV and PBV programs is Housing Quality Standards (HQS). On May 11, 2023, HUD published a final rule implementing the National Standards for the Physical Inspection of Real Estate (NSPIRE final rule), a new approach to defining and assessing housing quality across multiple HUD programs. 24 CFR 5.703 describes the NSPIRE standards, including variations for the HCV and PBV programs. Notice PIH 2023-28 finalized the administrative procedures for NSPIRE as they pertain specifically to the HCV and PBV programs. Collectively, this is known as “NSPIRE-V.”

The compliance date for NSPIRE-V is no later than October 1, 2025, at which point the HQS inspection standard will sunset. PHAs may, however, implement NSPIRE-V prior to October 1, 2025, provided they do so in accordance with requirements in FR Notice 7/5/24.

However, even once the HQS inspection standard has sunset, the regulations at 24 CFR Part 982 and 983 governing the HCV and PBV programs will continue to use the terms *HQS* and *housing quality standards* rather than *NSPIRE*. This is because, the definition of *housing quality standards (HQS)* at 24 CFR 982.4 means the minimum quality standards developed by HUD in accordance with 24 CFR 5.703 for the HCV program, including any variations approved by HUD for the PHA. As such, the model policy uses the term *housing quality standards* whenever applicable regulations use this term. Except in the chapter describing HQS, the acronym *HQS* is not used in the model policy in order to avoid confusion between the umbrella term meaning housing standards and the specific inspection protocol. The model policy only uses the term *NSPIRE* when referring to specific NSPIRE standards.

HOTMA SECTIONS 102 AND 104 CHANGES IN THE MODEL POLICY

On July 29, 2016, the Housing Opportunity Through Modernization Act of 2016 (HOTMA) was signed into law. HOTMA made numerous changes to statutes governing HUD programs, including sections of the United States Housing Act of 1937. Title I of HOTMA contains 14 different sections that impact the public housing and Section 8 programs. HUD published a final rule on February 14, 2023, revising regulations related to income and assets (Sections 102 and 104 of HOTMA). While the new income and asset regulations were effective January 1, 2024, PHAs were instructed to select a compliance date no later than January 1, 2025. Compliance with Sections 102 and 104 of HOTMA means not only applying HOTMA regulations to affected programs but also reporting in HUD’s new Housing Information Portal (HIP) system. Currently, PHAs remain unable to select a compliance date because HOTMA compliance depends on transitioning from HUD’s IMS/PIC system (which is unable to accept HOTMA-compliant Form HUD-50058) to HUD’s new HIP system (which will be the only system that accepts HOTMA-compliant Form HUD-50058). Because HOTMA-compliant reexaminations cannot be successfully submitted to IMS/PIC, HUD advised PHAs not to begin conducting reexaminations under HOTMA rules without further information on when the new HOTMA-compliant Form HUD-50058 in HIP will be available. PHAs cannot transition to HOTMA until HIP is in place, HOTMA-compliant, and accessible.

HOTMA VOUCHER FINAL RULE CHANGES IN THE MODEL POLICY

The final rule implementing streamlining changes to the HCV and PBV programs was published on May 7, 2024, and codified certain provisions in Sections 101, 105, 106, and 112 of HOTMA, as well as incorporating changes from the NSPIRE final rule discussed above. The rule is known as the “HOTMA voucher final rule.” The effective date of the HOTMA voucher final rule was June 6, 2024. While the compliance date for certain provisions of the rule is the same as the effective date, the compliance date for other provisions is not until 90 days, 180 days, or one year after the effective date. Further, many new changes to the regulations described in the HOTMA voucher final rule require changes to the PHA’s administrative plan. PHAs must make all revisions needed to bring existing policies into compliance with the final rule no later than June 6, 2025 (one year after the effective date). However, if a PHA wishes to use program flexibilities requiring adoption of new local policies not already present in the PHA’s administrative plan, the PHA must add those policies to the administrative plan prior to using those program flexibilities. Further, the delayed compliance date for policies of June 6, 2025, does not authorize delayed compliance with the provisions of the rule. PHAs that choose not to bring their policies into compliance with the rule until June 6, 2025, must still implement each provision on its compliance date.

In order to identify those provisions of the final rule that are not effective until after June 6, 2024, the model policy states that certain policies are not effective until a specific date.

RESOURCES CITED IN THE ADMINISTRATIVE PLAN

The administrative plan cites several documents. Where a document or resource is cited frequently, it may be abbreviated. Where it is cited only once or twice, the administrative plan may contain the entire name of the document or resource. Following is a key to abbreviations used for various sources that are frequently cited in the administrative plan and a list of references and document locations that are referenced in the administrative plan or that may be helpful to you.

HUD HCV Guidebook

In November 2019 HUD began issuing a new version of the HCV Guidebook chapter-by-chapter. Unlike the previous version of the HCV Guidebook in which chapters were numbered, the new version of the guidebook includes chapter names, but no numbers. As the new version of the guidebook has not yet been fully released, and since the previous version of the guidebook contains guidance not found in the new version, the policy cites both versions of the guidebook. Therefore, where the HCV Guidebook is cited in the policy, the citation will make a distinction between the “old” and “new” versions of the guidebook. The “old” version of the guidebook will continue to be cited as *HCV GB* with a chapter/page reference (example: HCV GB, p. 5-4). If HUD has also released a new chapter on the same topic with information that either adds new information or updates existing information from the previous guidebook, the new guidebook will be cited as *New HCV GB* with a chapter title and page reference (example: New HCV GB, *Payment Standards*, p. 11). On September 29, 2023, HUD issued Notice PIH 2023-27 to implement sections 102 and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA). The notice supersedes relevant portions of the guidebook, specifically the chapters on eligibility, denials, and annual reexaminations and interim reexaminations. Where chapters have not been altered by the HOTMA implementation notice, the model policy continues to cite the HCV Guidebook.

Abbreviations

Throughout the administrative plan, abbreviations are used to designate certain documents in citations. The following is a table of abbreviations of documents cited in the administrative plan.

<u>Abbreviation</u>	<u>Document</u>
<u>CFR</u>	<u>Code of Federal Regulations</u>
<u>HCV GB</u>	<u>Housing Choice Voucher Program Guidebook (7420.10G), April 2001.</u>
<u>New HCV GB</u>	<u>Housing Choice Voucher Program Guidebook (7420.10G), Various dates of release</u>
<u>HUD-50058 IB</u>	<u>HUD-50058 Instruction Booklet</u>
<u>RHIIP FAQs</u>	<u>Rental Housing Integrity Improvement Program (RHIIP) Frequently Asked Questions.</u>
<u>VG</u>	<u>PIH Notice 2004-01 Verification Guidance, March 9, 2004.</u>
<u>HB 4350.3</u>	<u>Occupancy Requirements of Subsidized Multifamily Housing Programs</u>

Resources and Where to Find Them

The HUD website is <https://www.hud.gov/>.

Guidebooks, handbooks, and other HUD resources may be found at the HUDClips website:
https://www.hud.gov/program_offices/administration/hudclips.

Following is a list of resources helpful to the PHA or referenced in the administrative plan, and the online location of each.

<u>Document and Location</u>
<u>Code of Federal Regulations</u> https://www.ecfr.gov/
<u>Eligibility of Students for Assisted Housing Under Section 8 of the U.S. Housing Act of 1937; Final Rule</u> http://edocket.access.gpo.gov/2008/pdf/E8-19435.pdf
<u>Enterprise Income Verification (EIV) System, Security Procedures for Upfront Income Verification data</u> https://www.hud.gov/sites/documents/EIVSECGUIDEPHA.PDF
<u>Executive Order 11063</u> https://www.archives.gov/federal-register/codification/executive-order/11063.html
<u>Federal Register</u> https://www.federalregister.gov/
<u>Housing Choice Voucher Program Guidebook (7420.10G), Updated Chapters</u> https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/guidebook
<u>HOTMA Final Rule</u> https://www.federalregister.gov/documents/2023/02/14/2023-01617/housing-opportunity-through-modernization-act-of-2016-implementation-of-sections-102-103-and-104?utm_campaign=subscription+mailing+list&utm_source=federalregister.gov&utm_medium=email
<u>HOTMA Implementation Notice, PIH 2023-27</u> https://www.hud.gov/sites/dfiles/OCHCO/documents/2023-27pihn.pdf
<u>Joint Statement of the Department of Housing and Urban Development and the Department of Justice, issued May 17, 2004</u> https://www.justice.gov/sites/default/files/crt/legacy/2010/12/14/joint_statement_ra.pdf
<u>Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, published January 22, 2007</u> https://www.lep.gov/guidance/HUD_guidance_Jan07.pdf
<u>Notice PIH 2010-26 (HA), Nondiscrimination and Accessibility Notice</u> https://www.hud.gov/sites/documents/DOC_8993.PDF
<u>Notice PIH 2017-12, Administrative Guidance for Effective and Mandated Use of the Enterprise Income Verification (EIV) System</u> https://www.hud.gov/sites/documents/PIH2017-12EIVNOTICE.PDF
<u>VAWA Resources</u> https://www.hud.gov/vawa

CHAPTER 1

OVERVIEW OF THE PROGRAM AND PLAN

INTRODUCTION

This chapter is applicable upon the PHA's HOTMA 102/104 compliance date. Prior to this date, the HACCC will follow policies as outlined in Chapter 1 of the Pre-HOTMA-Updated Administrative Plan approved 12/13/2022.

HACCC receives its funding for the Housing Choice Voucher (HCV) program from the Department of Housing and Urban Development. HACCC is not a federal department or agency. A public housing agency (PHA) is a governmental or public body, created and authorized by state law to develop and operate housing and housing programs for low-income families. HACCC enters into an Annual Contributions Contract (ACC) with HUD to administer the program requirements on behalf of HUD. HACCC must ensure compliance with federal laws, regulations and notices and must establish policy and procedures to clarify federal requirements and to ensure consistency in program operation.

This chapter contains information about HACCC and its programs with emphasis on the HCV program. It also contains information about the purpose, intent and use of the plan and guide. There are three parts to this chapter:

Part I: The Public Housing Agency (PHA). This part includes a description of HACCC, its jurisdiction, its programs, and its mission and intent.

Part II: The HCV Program. This part contains information about the Housing Choice Voucher program operation, roles and responsibilities, and partnerships.

Part III: The HCV Administrative Plan. This part discusses the purpose and organization of the plan and its revision requirements.

standard to the current amount in effect on HACCC's payment standard schedule or may reduce the payment standard to another amount that is higher than the normally applicable amount on the schedule. HACCC may also establish different policies for designated areas within its jurisdiction (e.g., different zip code areas).

In any case, HACCC must provide the family with at least 12 months' notice that the payment standard is being reduced before the effective date of the change. HACCC's policy on decreases in the payment standard during the term of the HAP contract apply to all families under HAP contract at the time of the effective date of the decrease in the payment standard within the designated area.

HACCC Policy

If HACCC changes its payment standard schedule resulting in a lower payment standard amount, during the term of a HAP contract, HACCC will not reduce the payment standard used to calculate subsidy for families under HAP contract as long as the HAP contract remains in effect.

HACCC will not establish different policies for decreases in the payment standard for designated areas within its jurisdiction.

Increases

~~If the payment standard amount has increased, the increased payment standard will be applied on the effective date of the first Interim or Annual reexamination completed the day after the staff is notified of a new Payment Standard or the effective date of the new Payment Standard, whichever is earlier. If the family has already completed their Annual reexamination with an effective date on or after the effective date of the new Payment Standard but did not have the benefit of having the new payment standard implemented due to the date the reexamination was completed, and, as a result, the family is burdened by the previous payment standard (rent portion is greater than 30% of their monthly adjusted income), an interim certification can be completed so that the family may benefit from the new payment standard.~~

~~If the payment standard is increased during the term of the HAP contract, the increased payment standard will be used to calculate the monthly housing assistance payment for the family~~

~~beginning on the effective date of the family's first regular reexamination on or after the effective date of the increase in the payment standard.~~

~~Families requiring or requesting interim reexaminations will not have their HAP payments calculated using the higher payment standard until their next annual reexamination [HCV GB, p. 7-8].~~

Changes in Family Unit Size

Irrespective of any increase or decrease in the payment standard, if the family unit size increases or decreases during the HAP contract term, the new family unit size must be used to determine the

PART II: INTERIM REEXAMINATIONS [24 CFR 982.516]

11-II.A. OVERVIEW

Family circumstances may change between annual reexaminations. HUD and PHA policies dictate what kinds of information about changes in family circumstances must be reported, and under what circumstances HACCC must process interim reexaminations to reflect those changes.

A family may request an interim determination of family income or composition because of any changes since the last determination. The PHA must conduct any interim reexamination within a reasonable period of time after the family request or when the PHA becomes aware of a change in the family's adjusted income that must be processed in accordance with HUD regulations. What qualifies as a "reasonable time" may vary based on the amount of time it takes to verify information, but the PHA generally should conduct the interim reexamination not longer than 30 days after the PHA becomes aware of changes in income.

Notice PIH 2023-27 changes the conditions under which interim reexaminations must be conducted, codifies when interim reexaminations should be processed and made effective, and requires related changes for annual reexaminations and streamlined income determinations. When the PHA determines that an interim reexamination of income is necessary, they must ask the family to report changes in all aspects of adjusted income.

11-II.B. CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION

Reporting

PHAs must require families to report household composition changes; however, PHAs determine the timeframe in which reporting happens [Notice PIH 2023-27]. HACCC must adopt policies prescribing when and under what conditions the family must report changes in income and family composition [24 CFR 960.257(b)(5)].

HACCC Policy

All families must report all changes in family and household composition that occur between annual reexaminations within ~~10 business~~ 14 calendar days of the change.

~~New Family Members Not Requiring PHA Approval~~

The addition of a family member as a result of birth, adoption, or court-awarded custody does not require PHA approval. However, the family is required to promptly notify HACCC of the addition and supply HACCC with all required verifications. [24 CFR 982.551(h)(2)].

~~New Family and Household Members Requiring Subject to PHA Approval~~

With the exception of children who join the family as a result of birth, adoption, or court-awarded custody, a family must request PHA approval to add a new family member [24 CFR 982.551(h)(2)] or other household member (live-in aide or foster child) [24 CFR 982.551(h)(4)].

Although the PHA must verify aspects of program eligibility when any new family member is added, the Streamlining Final Rule removed the requirement that PHAs conduct a reexamination of income whenever a new family member is added. The PHA may state in policy that an income reexamination will be conducted.

HACCC Policy

HACCC shall conduct a reexamination to determine any new income or deductions associated with the additional family member and to make appropriate adjustments in the family share of the rent and the HAP payment.

If a change in family size causes a violation of space standards (see Chapter 8), HACCC must issue the family a new voucher, and the family and PHA must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, HACCC must terminate the family's HAP contract in accordance with its terms [24 CFR 982.403].

HACCC Policy

Families must request PHA approval to add a new family member, live-in aide, foster child, or foster adult. This includes any person not on the lease who is expected to stay in the unit for more than 15 consecutive days or 45 cumulative days within a 12-month period and therefore no longer qualifies as a "guest." Requests must be made in writing and approved by HACCC prior to the individual moving into the unit.

HACCC will not increase the subsidy size (number of bedrooms) when adding additional family member(s) to an existing tenancy. This does not include adults by marriage, children by birth, adoption or ~~legal guardianship~~~~court-awarded custody~~. The family is required to sign a Waiver of Voucher Size Standards declaring that they understand that there will be no increase in their subsidy size as a result of the addition of the family member outside of marriage, children by birth, adoption or court-awarded custody. Additionally, if they family moves from the assisted unit, the voucher size will remain the same size as it was prior to the addition of the new family member(s).

HACCC will not approve the addition of a new family or household member unless the individual meets HACCC's eligibility criteria (see Chapter 3) and documentation requirements (see Chapter 7, Part II).

If HACCC determines an individual meets HACCC's eligibility criteria as defined in Chapter 3 and documentation requirements of Chapter 7, Part II, HACCC will provide written approval to the family. If the approval of a live-in aide will cause overcrowding according to NSPIRE standards, the approval letter will explain that the family will be issued a voucher and will be required to move.

HACCC will not approve the addition of a foster child or foster adult if it will cause a violation of space standards. If the addition of a foster child results in a violation of space standards, the family will be required to move in order to add the foster child(ren). Note this provision is only for foster children, not foster adults. The addition of a foster adult shall not result in a change in the subsidy size.

If HACCC determines that an individual does not meet HACCC's eligibility criteria or documentation requirements defined in Chapter 3, HACCC will notify the family in writing of its decision to deny approval of the new family or household member and the reasons for the denial.

HACCC will make its determination within 14 calendar days of receiving all information required to verify the individual's eligibility.

Departure of a Family or Household Member

Families must promptly notify HACCC if any household member no longer lives in the unit [24 CFR 982.551(h)(3)]. Because household members are considered when determining the family unit (voucher) size [24 CFR 982.402], HACCC also needs to know when any live-in aide, foster child, or foster adult ceases to reside in the unit. The PHA must process an interim for all decreases in adjusted income when a family member permanently moves out of the unit pursuant to section 7-II.D. FAMILY RELATIONSHIPS of this plan.

HACCC Policy

If a household member ceases to reside in the unit, the family must inform HACCC within 14 calendar days. This requirement also applies to a family member who has been considered temporarily absent at the point that the family concludes the individual is permanently absent.

If a live-in aide, foster child, or foster adult ceases to reside in the unit, the family must inform HACCC within 14 calendar days.

HACCC will attempt to contact a household member to be removed via notice. The household member will have 14 calendar days to contact HACCC confirming and/or disputing the change before HACCC moves forward with Head of Household's request to remove the household member. If the member fails to respond to the notice within 14 calendar days, HACCC will proceed with the removal of the household member.

11-II.C. CHANGES AFFECTING INCOME OR EXPENSES

Overview

Interim reexaminations for changes in income or expenses may be scheduled either because the PHA has reason to believe that changes in income or expenses may have occurred, or because the family reports a change.

PHAs must conduct an interim reexamination of family income when the PHA becomes aware that the family's adjusted income has changed by an amount that the PHA estimates will result in an increase of 10 percent or more in adjusted income, with the following exceptions:

- PHAs may not consider any increases in earned income when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction during the same reexamination cycle; and
- PHAs may choose not to conduct an interim reexamination during the last three months of a certification period if a family reports an increase in income within three months of the next annual reexamination effective date.

When the family previously received an interim reexamination for a decrease to adjusted income during the same annual reexamination cycle, a PHA has the discretion whether to consider a subsequent increase in earned income.

HACCC Policy

HACCC is required to act on specified changes that occur mid-period or outside of the application or Recertification reporting process. Mid-period or interim changes, to a tenant's voucher or rent include changes that result from client mandatory reporting, certain client voluntary reporting, and HACCC-initiated actions. HACCC must now act on both verified voluntary and mandated interim reporting that result in an increase due to changes to income source, frequency, or dollar amount regardless of whether the amount exceeds \$200/month.

When a family reports an increase in their earned income between annual reexaminations, HACCC will ~~not~~ conduct an interim reexamination, regardless of the amount of the increase, ~~unless there was a previous decrease since the family's last annual reexamination.~~

HACCC will process an interim reexamination for any increases in unearned income ~~of 10 percent or more in adjusted income.~~

HACCC will not perform an interim reexamination when a family reports an increase in income (whether earned or unearned income) within three months of their annual reexamination effective date. However, families who delay reporting income increases until the last three months of their certification period may be subject to retroactive rent increases in accordance with HACCC policies in Chapter 14.

Concurrent Increases in Earned and Unearned Income [Notice PIH 2023-27]

When the family reports an increase in both earned and unearned income at the same time, the PHA must look at the earned and unearned income changes independently of each other to determine if an interim reexamination is performed. The PHA will only conduct an interim reexamination when the increase independently meets the 10 percent threshold and all other

requirements for performing interim reexaminations. For example, if a family reported increases in both earned and unearned income that overall resulted in a 12 percent increase in their adjusted income, but the change in earned income represented a 7 percent increase and the change in unearned income represented a 5 percent increase, the PHA may not perform an interim for either change since neither change meets the 10 percent threshold amount independently. If the change in unearned income met the 10 percent threshold in this case, the PHA would be required to perform an interim. If the change in earned income met the 10 percent threshold in this case, the PHA would refer to PHA policy to determine whether an interim was required.

Cumulative Increases [Notice PIH 2023-27]

A series of smaller reported increases in adjusted income may cumulatively meet or exceed the 10-percent increase threshold, at which point the PHA must conduct an interim reexamination in accordance with PHA policy.

Family Reporting

The PHA must adopt policies consistent with HUD regulations prescribing when and under what conditions the family must report a change in family income or composition [24 CFR 982.516(d)].

PHA policy may require families to report only changes that the family estimates meet the threshold for an interim reexamination or the PHA may establish policies requiring that families report all changes in income and household composition, and the PHA will subsequently determine if the change requires an interim reexamination [Notice PIH 2023-27].

When the PHA determines that an interim reexamination of income is necessary, they must ask the family to report changes in all aspects of adjusted income. For example, if the family is reporting a decrease in adjusted income that is more than 10 percent, but the family also had a change in assets that would result in a change in income, the change in assets must also be reviewed [Notice PIH 2023-27].

HACCC Policy

The family will be required to report all changes in income regardless of the amount of the change, whether the change is to earned or unearned income, or if the change occurred during the last three months of the certification period. Families must report changes in income within ~~10 business~~ 14 calendar days of the date the change takes effect. The family may notify HACCC of changes either orally or in writing. If the family provides oral notice, HACCC will document the oral reporting of the change in income and~~may~~ also require the family to submit the changes in writing. The oral reporting will count as part of the 14 calendar-day notification period regardless of when the written request is received. For decreases in income, the change in rent will be effective on the first of the month following the reporting month in which the family made the oral report. For increases in income, the rent change will take effect after a 30-Day notification to the tenant and owner.

~~Within 10-business days of the family reporting the change, HACCC will determine whether the change will require an interim reexamination.~~

~~If the change will not result in an interim reexamination, HACCC will note the information in the tenant file but will not conduct an interim reexamination. HACCC will send the family written notification within 10 business days of making this determination informing the family that HACCC will not conduct an interim reexamination.~~

~~To complete~~If the change will result in an interim reexamination, HACCC will determine the documentation the family will be required to submit based on the type of change reported and HACCC policies in Chapter 7. HACCC will ask the family to report changes in all aspects of adjusted income at this time. The family must submit any required information or documents within 10 business days of receiving a request from HACCC. This time frame may be extended for good cause with HACCC approval. HACCC will accept required documentation by mail, email, fax, or in person. HACCC will conduct the interim within a reasonable time period based on the amount of time it takes to verify the information.

Generally, the family will not be required to attend an interview for an interim reexamination. However, if HACCC determines that an interview is warranted, the family may be required to attend.

11-II.D. EFFECTIVE DATES [24 CFR 982.516(e) and Notice 2023-27]

Changes Reported Timely [Notice PIH 2023-27]

If the family reports a change in family income or composition timely in accordance with PHA policies:

- For rent increases, the PHA must provide the family with 30 days advance written notice. The rent increase is effective the first of the month after the end of that 30-day notice period.
- Rent decreases are effective on the first of the month after the date of the actual change leading to the interim reexamination of family income. This means the decrease will be applied retroactively.

Changes Not Reported Timely [Notice PIH 2023-27]

If the family failed to report a change in family income or composition timely in accordance with PHA policies:

- For rent increases, the PHA must implement any resulting rent increases retroactively to the first of the month following the date of the change leading to the interim reexamination of family income.
- For rent decreases, the PHA must implement the change no later than the first rent period following completion of the interim reexamination.

PART III: RECALCULATING FAMILY SHARE AND SUBSIDY AMOUNT

11-III.A. OVERVIEW

After gathering and verifying required information for an annual or interim reexamination, HACCC must recalculate the family share of the rent and the subsidy amount and notify the family and owner of the changes [24 CFR 982.516(d)(2), HCV 12-6 and 12-10]. While the basic policies that govern these calculations are provided in Chapter 6, this part lays out policies that affect these calculations during a reexamination.

11-III.B. CHANGES IN PAYMENT STANDARDS AND UTILITY ALLOWANCES

In order to calculate the family share of the rent and HAP amount correctly, changes in payment standards, subsidy standards, or utility allowances may need to be updated and included in HACCC's calculations.

Specific policies governing how subsidy standards, payment standards, and utility allowances are applied are discussed below.

Payment Standards [24 CFR 982.505]

The family share of the rent and HAP calculations must use the correct payment standard for the family, taking into consideration the family unit size, the size of unit, and the area in which the unit is located [HCV GB, p. 12-5]. See Chapter 6 for information on how to select the appropriate payment standard.

When HACCC changes its payment standards or the family's situation changes, new payment standards are applied at the following times:

- If HACCC's payment standard amount changes during the term of the HAP contract, the date on which the new standard is applied depends on whether the standard has increased or decreased:
 - If the payment standard amount has increased, the increased payment standard will be applied on the effective date of -at the first Interim or Annual reexamination following the effective date completed the day after the staff is notified of a new Payment Standard or the effective date of the new Payment Standard, whichever is earlier, date of the increase in the payment-If the family has already completed their Annual reexamination with an effective date on or after the effective date of the new Payment Standard but did not have the benefit of having the new payment standard implemented due to the date the reexamination was completed, and, as a result, standard the family is burdened by the previous payment standard (rent portion is greater than 30% of their monthly adjusted income), an interim certification can be completed so that the family may benefit from the new payment standard.
 - If the payment standard amount has decreased, during the term of a HAP contract, HACCC shall not reduce the payment standard as long as the HAP contract remains in effect. At the family's second annual reexamination, HACCC may, but is not required to, apply the

Commented [TU3]: This language may need to change based on Management decision.

Updating Payment Standards

When HUD updates its FMRs, HACCC must update its payment standards if the standards are no longer within the basic range [24 CFR 982.503(b)]. HUD may require HACCC to make further adjustments if it determines that rent burdens for assisted families in HACCC's jurisdiction are unacceptably high [24 CFR 982.503(g)].

HACCC Policy

HACCC will review the appropriateness of the payment standards on an annual basis when the new FMR is published, and at other times as determined necessary. In addition to ensuring the payment standards are always within the "basic range" HACCC will consider the following factors when determining whether an adjustment should be made to the payment standard schedule:

Funding Availability: HACCC will review the budget to determine the impact projected subsidy adjustments will have on funding available for the program and the number of families served. HACCC will compare the number of families who could be served under revised payment standard amounts with the number assisted under current payment standard amounts.

Rent Burden of Participating Families: Rent burden will be determined by identifying the percentage of families, for each unit size, that are paying more than 30 percent of their monthly adjusted income as the family share. When 40 percent or more of families, for any given unit size, are paying more than 30 percent of adjusted monthly income as the family share, HACCC will consider increasing the payment standard. In evaluating rent burdens, HACCC will not include families renting a larger unit than their family unit size.

Quality of Units Selected: HACCC may review the quality of units selected by participant families when making the determination of the percent of income families are paying for housing, to ensure that payment standard increases are only made when needed to reach the mid-range of the market.

Changes in Rent to Owner: HACCC may review a sample of the units to determine how often owners are increasing or decreasing rents and the average percent of increases/decreases by bedroom size.

Unit Availability: HACCC may review the availability of units for each unit size, particularly in areas with low concentrations of poor and minority families.

Lease-up Time and Success Rate: HACCC may consider the percentage of families that are unable to locate suitable housing before the voucher expires and whether families are leaving the jurisdiction to find affordable housing.

If the payment standard amount has increased, Changes to payment standard amounts will be applied on the effective date of the first Interim or Annual reexamination completed the day after the staff is notified of a new Payment Standard or the effective date of the new Payment Standard.

~~whichever is earlier. If the family has already completed their Annual reexamination with an effective date on or after the effective date of the new Payment Standard but did not have the benefit of having the new payment standard implemented due to the date the reexamination was completed, and, as a result, the family is burdened by the previous payment standard (rent portion is greater than 30% of their monthly adjusted income), an interim certification can be completed so that the family may benefit from the new payment standard. effective on January 1st of every year, or within three months of the FMR effective date, whichever is earlier. In no event will Payment Standards be effective less than 90 days/3 months from the HUD published effective date of the FMR. The effective date is applicable both to HUD-required revisions and to discretionary revisions.~~

~~If a family has completed an Annual Certification and as a result is rent burdened because the new higher payment standard was not applied, HACCC shall conduct an Interim Certification of Correction to the Annual Certification to apply the new payment standard to reduce the burden on the family.~~

For all other transactions where the payment standard decreases, the pre-adjusted higher payment standard will remain in place as long as the family continues to reside in the same unit they were living in when the FMR was reduced.

Exception Payment Standards [982.503(c)(5), Notice PIH 2018-01, FR Notice 9/27/21]

A non-SAFMR PHA may establish an exception payment standard for a zip code area of up to and including 110 percent of the SAFMR determined by HUD for that zip code area. Regardless of the level of the exception payment standard compared to the metropolitan area FMRs (MAFMRs), the PHA must send an email to SAFMRs@hud.gov to notify HUD that it has adopted an exception payment standard based on the SAFMR. A PHA that adopts an exception payment standard pursuant to this authority must apply it to the entire ZIP code area, for both its HCV, and if applicable, its PBV program. For the PBV program, this means that the rent to owner may not exceed the new exception payment standard amount, provided the rent is still reasonable. A PHA that adopts an exception payment standard area must revise its briefing materials to make families aware of the exception payment standard and the area that it covers.

In addition, HUD allows PHAs to establish a HUD-Veterans Affairs Supportive Housing (HUD-VASH) exception payment standard. PHAs may go up to but no higher than 120 percent of the FMR or SAFMR specifically for VASH families. PHAs who want to establish a VASH exception payment standard over 120 percent must still request a waiver from HUD (See Section 19-III.E.).

Voluntary Use of Small Area FMRs [24 CFR 982.503, Notice PIH 2018-01]

PHAs that administer vouchers in a metropolitan area where the adoption of SAFMRs is not required may request approval from HUD to voluntarily adopt SAFMRs. SAFMRs may be voluntarily adopted for one or more zip code areas.

HACCC Policy

HACCC will not voluntarily adopt the use of SAFMRs except to establish exception payment standards in certain zip code areas.

re-decoration must be in accordance with the standard practice for the project as established by the owner.

HACCC may elect to establish additional requirements for quality, architecture, or design of PBV housing. Any such additional requirements must be specified in the Agreement to enter into a HAP contract and the HAP contract. These requirements must be in addition to, not in place of, compliance with NSPIRE standards.

HACCC Policy

HACCC will identify the need for any special features on a case-by-case basis depending on the intended occupancy of the PBV project. HACCC will specify any special design standards or additional requirements in the invitation for PBV proposals, the agreement to enter into HAP contract, and the HAP contract.

Vacancy Payments [24 CFR 983.352(B)]

At the discretion of HACCC, the HAP contract may provide for vacancy payments to the owner for a HACCC-determined period of vacancy extending from the beginning of the first calendar month after the move-out month for a period not exceeding two full months following the move-out month. The amount of the vacancy payment will be determined by HACCC and cannot exceed the monthly rent to owner under the assisted lease, minus any portion of the rental payment received by the owner (including amounts available from the tenant's security deposit).

HACCC Policy

HACCC will provide vacancy payments to the owner equal to the contract rent in effect at the time of the vacancy for a period not to exceed 60 days. The HAP contract with the owner will contain the terms under which vacancy payments will be made. Generally, the owner shall retain the HAP Payment for the vacating month. The vacancy period begins with the first day of the month following the vacating month for a period of 60 days or until the unit is leased again, whichever is sooner.

Vacancy Loss Guidelines:

1. The Vacancy Period begins the first of the month following the moveout month
2. The Vacancy Period continues for two full months unless the unit is occupied sooner
3. If the Vacancy Period is less than two full months, the vacancy amount for the final month will be prorated based on a 30-day month
4. The Vacancy Payment per month is equal to the "Total Contract Rent" less any other payments or compensation the owner has received or will receive to cover the Vacancy Period. This includes any funds the owner has applied or will apply from the tenant's security deposit to cover the Vacancy Period. If there are any such payments, the owner will report them to HACCC and HACCC will reduce the Vacancy Payment by this amount.
5. "Total Contract Rent" means the Tenant Rent Portion plus the Housing Assistance Payment.
6. The owner will certify that all information they report is true and correct.

- The owner certifies that the vacancy is not the fault of the owner and that the unit was vacant during the period for which payment is claimed;
- The owner certifies that it has taken every reasonable action to minimize the likelihood and length of vacancy; and
- The owner provides any additional information required and requested by HACCC to verify that the owner is entitled to the vacancy payment.

The owner must submit a request for vacancy payments in the form and manner required by HACCC and must provide any information or substantiation required by HACCC to determine the amount of any vacancy payment.

If an owner's HAP contract calls for vacancy payments to be made, and the owner wishes to receive vacancy payments, the owner must have properly notified HACCC of the vacancy in accordance with the policy in Section 17-VI.F. regarding filling vacancies.

In order for a vacancy payment request to be considered, it must be made within ~~60~~ 60+ business days of the end of the period for which the owner is requesting the vacancy payment. The vacancy period begins with the first day of the month following the vacating month. For example, if the family vacates the unit on June 10th, the owner shall be entitled to keep the HAP payment for June and the Vacancy period begins from July 1 through August 31. If the unit is not re-rented during this period, then the owner has until October 31 to submit a claim for vacancy loss and can claim 60 days of rent as reimbursement for the vacancy period. If the unit is re-rented before the 60-day vacancy period ends, then the owner is entitled to apply for vacancy loss from the first day of the vacancy period through the day before the start of the new tenancy. The request must include the required owner certifications and HACCC may require the owner to provide documentation to support the request. If the owner does not provide the information requested by HACCC within 10 business days of HACCC's request, no vacancy payments will be made.

17-IX.C. TENANT RENT TO OWNER

[24 CFR 983.353]

The tenant rent is the portion of the rent to owner paid by the family. The amount of tenant rent is determined by HACCC in accordance with HUD requirements. Any changes in the amount of tenant rent will be effective on the date stated in HACCC notice to the family and owner.

The family is responsible for paying the tenant rent (total tenant payment minus the utility allowance). The amount of the tenant rent determined by HACCC is the maximum amount the owner may charge the family for rental of a contract unit. The tenant rent covers all housing services, maintenance, equipment, and utilities to be provided by the owner. The owner may not demand or accept any rent payment from the tenant in excess of the tenant rent as determined by HACCC. The owner must immediately return any excess payment to the tenant.

RAD Phase-in of Increase in Tenant Rent Portion.

19-IV.C. PARTNERSHIP AND SUPPORTIVE SERVICES [Notice PIH 2020-01]

PHAs are encouraged but not required to establish formal and informal partnerships with a variety of organizations that assist persons with disabilities to help ensure eligible participants find and maintain stable housing.

HACCC Policy

HACCC will implement a Mainstream program in partnership with the Department of Health, Housing and Homeless Services (H3) and the Housing Consortium of the East Bay (HCEB).

19-IV.D. WAITING LIST ADMINISTRATION

General Waiting List Requirements [Notice PIH 2020-01 and Mainstream Voucher Basics Webinar, 10/15/20]

PHAs must not have a separate waiting list for Mainstream voucher assistance since the PHA is required by the regulations to maintain one waiting list for tenant-based assistance [24 CFR 982.204(f)]. All PHA policies on opening, closing, and updating the waiting list, as well as waiting list preferences in Chapter 4, apply to the Mainstream program.

When the PHA is awarded Mainstream vouchers, these vouchers must be used for new admissions to the PHA's program from the waiting list. The PHA must lease these vouchers by pulling the first Mainstream-eligible family from its tenant-based waiting list. PHAs are not permitted to reassign existing participants to the program in order to make regular tenant-based vouchers available. Further, the PHA may not skip over Mainstream-eligible families on the waiting list because the PHA is serving the required number of Mainstream families.

Upon turnover, vouchers must be provided to Mainstream-eligible families. If a Mainstream turnover voucher becomes available, the PHA must determine if the families at the top of the waiting list qualify under program requirements.

Admission Preferences [Notice PIH 2020-01; FY17 Mainstream NOFA; FY19 Mainstream NOFA]

If the PHA claimed points for a preference in a NOFA application for Mainstream vouchers, the PHA must adopt a preference for at least one of the targeted groups identified in the NOFA.

HACCC Policy

HACCC claimed a preference for a targeted group as part of an application for Mainstream vouchers under a NOFA. HACCC will offer the following preference:

- **Mainstream (250 Points).** A preference for non-elderly persons with disabilities transitioning out of institutional and other segregated settings, at serious risk of institutionalization, homeless, at risk of becoming homeless or previously experienced homelessness and is currently a client in permanent supportive housing or a rapid rehousing project. Families on the HCV waiting list shall have first priority for the Mainstream vouchers and thereafter ~~a separate waiting list for Mainstream-eligible households shall be maintained to include~~ referrals from the Housing Consortium of the

East Bay and the Contra Costa County Health, Housing and Human Services department who are partners with HACCC in the Mainstream voucher program.

19-IV.E. PORTABILITY [Notice PIH 2020-01 and Mainstream Voucher Basics Webinar, 10/15/20]

Mainstream voucher participants are eligible for portability under standard portability rules and all PHA policies regarding portability in Chapter 10, Part II apply to Mainstream families.

The following special considerations for Mainstream vouchers apply under portability:

- If the receiving PHA has a Mainstream voucher available, the participant may remain a Mainstream participant.
 - If the receiving PHA chooses to bill the initial PHA, then the voucher will remain a Mainstream voucher.
 - If the receiving PHA chooses to absorb the voucher, the voucher will be considered a regular voucher, or a Mainstream voucher if the receiving PHA has a Mainstream voucher available, and the Mainstream voucher at the initial PHA will be freed up to lease to another Mainstream-eligible family.
- If the receiving PHA does not have a Mainstream voucher available, the participant may receive a regular voucher.

19-IV.F. PROJECT-BASING MAINSTREAM VOUCHERS [FY19 Mainstream Voucher NOFA Q&A]

The PHA may project-base Mainstream vouchers in accordance with all applicable PBV regulations and PHA policies in Chapter 17. PHAs are responsible for ensuring that, in addition to complying with project-based voucher program requirements, the project complies with all applicable federal nondiscrimination and civil rights statutes and requirements. This includes, but is not limited to, Section 504 of the Rehabilitation Act (Section 504), Titles II or III of the Americans with Disabilities (ADA), and the Fair Housing Act and their implementing regulations at 24 CFR Part 8; 28 CFR Parts 35 and 36; and 24 CFR Part 100. Mainstream vouchers are subject to the PBV program percentage limitation discussed in Section 17-I.A.

19-IV.G. MANDATORY PROGRAM POLICIES

Initial Search Term

HUD waived 24 Code of Federal Regulations (CFR) 982.303(a), which requires an initial search term of at least 60 days, and establishing an alternative requirement that the initial search term for a Mainstream Voucher must be at least 120 days. The initial 120-day term also applies when a family chooses to move to a new unit with continued assistance inside or outside the PHA's jurisdiction, in accordance with 24 CFR 982 subpart H. When issuing a Mainstream Voucher, PHAs also must provide a current listing of available accessible units known to the PHA and, if necessary, otherwise assist the family in identifying an accessible unit (24 CFR 8.28(a)(3)).

HACCC Policy

HACCC shall issue Mainstream vouchers with an initial search period of 120 days. In addition, HACCC shall provide participants of the Mainstream Program information on available accessible units as found on its unit search portal, www.affordablehousing.com.

Voucher Extension of Search Term

The PHA's administrative plan must describe its policies for granting extensions of the initial 120-day term (24 CFR 982.303(b)(1)) and provide clear instructions to families on the procedures for requesting an extension. If a family requires additional time for their unit search, PHAs are required to provide an extension as part of a reasonable accommodation under Section 504 of the Rehabilitation Act and HUD's Section 504 requirements (24 CFR part 8; See also 24 CFR 982.303(b)(2)).

While all Mainstream Voucher applicants include a family member with a disability and are eligible for an extension as part of a reasonable accommodation, PHAs have considerable discretion in the details they may establish for their general extension policy under (24 CFR 982.303(b)(1)) outside of the context of reasonable accommodations, including the deadline for requesting an extension and the length of the extension. National voucher success rates and median search times indicate that, on average, Mainstream Voucher applicants take longer to lease than HCV applicants and are more likely to ultimately be unsuccessful in using their voucher compared to other special purpose voucher applicants. As discussed above in Section 6(a), multiple circumstances may contribute to the barriers that Mainstream Voucher applicants experience in successfully leasing.

Given the challenges Mainstream Voucher applicants may face in securing a unit, applicants should be provided with flexible extension policies. To support this need, HUD waived 24 CFR 982.303(b)(1) and established an alternative requirement for the process of requesting search extensions. PHAs must adopt an extension policy for Mainstream Vouchers that includes the following: 1) each extension must be for a minimum of 90 days, 2) the PHA must approve the first extension request, regardless of how the request is made (written or verbal) or when it is made, as long as the request is made on or before the term expiration date and is consistent with applicable requirements; subsequent requests should be processed in accordance with the PHA's administrative plan, and 3) the PHA must, on at least one occasion after voucher issuance, notify the family prior to the initial term expiration to remind them of the term expiration date, the process for requesting an extension, and to inquire if the family is in need of assistance with their housing search.

PHAs may not restrict a first extension approval to certain circumstances or require documentation from applicants. For all extension requests, the written or verbal request is sufficient. Note that this alternative requirement also applies to current Mainstream Voucher participants who choose to move to a new unit with continued assistance inside or outside the PHA's jurisdiction, in accordance with 24 CFR 982 subpart 11.

HACCC Policy

HACCC shall grant extensions to the initial search period as requested by the family consistent with HUD regulations and ensure that the following is met:

- i. Each extension must be for a minimum of 90 days.
- ii. HACCC must approve the first extension request, regardless of how the request is made (written or verbal) or when it is made, as long as the request is made on or before the term expiration date and is consistent with applicable requirements; subsequent requests should be processed in accordance with this administrative plan, and
- iii. HACCC must, on at least one occasion after voucher issuance, notify the family prior to the initial term expiration to remind them of the term expiration date, the process for requesting an extension, and to inquire if the family is in need of assistance with their housing search.

APPENDIX I

HOTMA 102/104 Appendix to the Administrative Plan

Purpose of the Appendix

HUD published a final rule on February 14, 2023, revising regulations related to income, assets, adjusted income, verification, and reexams (among others) to implement Sections 102 and 104 of HOTMA. While the new regulations were effective January 1, 2024, HUD has delayed the compliance date for HOTMA 102/104. Initially, HUD published a delayed compliance date of January 1, 2025, but HUD again delayed the compliance date for HOTMA 102/104 and no new date has been provided. Compliance with Sections 102 and 104 of HOTMA means not only applying HOTMA 102/104 regulations to affected programs but also reporting in HUD's new Housing Information Portal (HIP) system. Currently, PHAs remain unable to comply with HOTMA 102/104 because compliance depends on transitioning from HUD's IMS/PIC system (which is unable to accept HOTMA-compliant Form HUD-50058) to HUD's new HIP system (which will be the only system that accepts HOTMA-compliant Form HUD-50058). PHAs cannot transition to HOTMA until HIP is in place, HOTMA-compliant, and accessible. However, HUD has determined that a few HOTMA 102/104 policies are not dependent on transition systems and easily isolated from other HOTMA 102/104 policy changes. These policies may be implemented prior to the migration to HIP.

HUD stated that PHAs may update their policy documents before determining the date at which they will transition to all HOTMA Section 102 and 104 policies. HUD stated that in order to update their policy documents for HOTMA in this circumstance, PHAs may create an appendix that contains the HOTMA policies that will be incorporated at a later date. The model policy adopts such an approach. HOTMA 102/104 policies are provided in each affected area of the model policy. However, with the exception of the policies HUD has indicated may be adopted early, HOTMA policies that are "on hold" are indicated in the model policy as such. Further, an appendix has been provided to explicitly call out those policies that are on hold.

HOTMA 102/104 Policies Not Yet Implemented

Chapter 00

No HOTMA 102/104 policies apply.

Chapter 1

No HOTMA 102/104 policies apply.

Chapter 2

No HOTMA 102/104 policies apply.

Chapter 3

Model policy section **3-I.B. FAMILY AND HOUSEHOLD** is amended to comply with section E.1 of Notice PIH 2023-27, **Definition of Family**

Model policy section **3-I.K. FOSTER CHILDREN AND FOSTER ADULTS** is amended to comply with section E.2 of Notice PIH 2023-27, **New Definitions of Foster Adult and Foster Child**

Model policy section **3-II.D. FAMILY CONSENT TO RELEASE OF INFORMATION** is amended to comply with section J.2 of Notice PIH 2023-27, **Revocation of Consent**

Model Policy section **III.C. RESTRICTION ON ASSISTANCE BASED ON ASSETS** is added to comply with section A.1 of Notice PIH 2023-27, **Asset Limitation**

Chapter 4

No HOTMA 102/104 policies apply.

Chapter 5

No HOTMA 102/104 policies apply.

Chapter 6

Prior to the PHA's HOTMA compliance date, the PHA will follow policies in Chapter 6.A.

Upon the PHA's HOTMA compliance date, the PHA will follow policies in Chapter 6.B.

Chapter 7

Prior to the PHA's HOTMA compliance date, the PHA will follow policies in Chapter 7.A.

Upon the PHA's HOTMA compliance date, the PHA will follow policies in Chapter 7.B.

Chapter 8

No HOTMA 102/104 policies apply. However, prior to the NSPIRE compliance date, the PHA will follow policies in Chapter 8.A. Upon the NSPIRE compliance date, the PHA will follow policies in Chapter 8.B.

Chapter 9

No HOTMA 102/104 policies apply.

Chapter 10

No HOTMA 102/104 policies apply.

Chapter 11

Prior to the PHA's HOTMA compliance date, the PHA will follow policies in Chapter 11.A.

Upon the PHA's HOTMA compliance date, the PHA will follow policies in Chapter 11.B.

Chapter 12

Model policy section 12-I.D. MANDATORY TERMINATION OF ASSISTANCE is amended to comply with section J.2 of Notice PIH 2023-27, Revocation of Consent

Model Policy section 12-I.E. MANDATORY POLICIES AND OTHER AUTHORIZED TERMINATIONS is added to comply with section A.1 of Notice PIH 2023-27, Asset Limitation

Chapter 13

No HOTMA 102/104 policies apply.

Chapter 14

Model policy section 14-II.D. PHA-CAUSED ERRORS OR PROGRAM ABUSE is amended to comply with 24 CFR 5.609(c)(4), De Minimis Errors

Chapter 15

No HOTMA 102/104 policies apply.

Chapter 16

No HOTMA 102/104 policies apply.

Chapter 17

No HOTMA 102/104 policies apply.

Chapter 18

No HOTMA 102/104 policies apply.

Chapter 19

No HOTMA 102/104 policies apply.

Glossary

The following definitions are applicable upon the PHA's implementation of HOTMA 102/104:

Annual income (revised)

Day laborer

De minimis error

Earned income

Family (revised)

Foster child

Foster adult

Independent contractor

Inflationary index

Net family assets (revised)

Real property

Seasonal worker

Unearned income

B.1 (c) Deconcentration Policy

Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2]

HACCC's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of HACCC's deconcentration policies must be included in its annual plan [24 CFR 903.7(b)].

HACCC's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

Steps for Implementation [24 CFR 903.2(c)(1)]

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, HACCC must comply with the following steps:

Step 1. HACCC must determine the average income of all families residing in all HACCC's covered developments. HACCC may use the median income, instead of average income, provided that HACCC includes a written explanation in its annual plan justifying the use of median income.

HACCC Policy

HACCC will determine the average income of all families in all covered developments on an annual basis.

Step 2. HACCC must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, HACCC has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

HACCC Policy

HACCC will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

Step 3. HACCC must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low income family (30% of median income).

Step 4. HACCC with covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.

Step 5. Where the income profile for a covered development is not explained or justified in the annual plan submission, HACCC must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances HACCC's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration
- Providing other strategies permitted by statute and determined by HACCC in consultation with the residents and the community through the annual plan process to be responsive to local needs and PHA strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under HACCC's deconcentration policy. HACCC must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under HACCC's deconcentration policy [24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, HACCC will be considered to be in compliance with the deconcentration requirement and no further action is required.

Deconcentration Incentives

HACCC has 3 general occupancy (family) public housing developments covered by the deconcentration rule. None of these covered developments have average incomes above or below 85% to 115% of the average incomes of all such developments. The Contra Costa Housing Authority will analyze developments on a regular basis according to the deconcentration rule.

B.1 Housing Needs

Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

High housing costs reduce economic opportunities, limit access to jobs and services, and restrict the ability of lower-income households, including the elderly and persons with disabilities, to live in the communities and neighborhoods of their choice. The gap between what lower income households can afford, and the median price of homes or rents (an affordability gap) results in households paying more than 30 percent of their income for housing, and in overcrowding.

Based on the most recent Consolidated Plan for the County (2020-2025), of 384,644 households in the HOME Consortia area, there are 184,698 households or 48 percent of all households that are at 100 percent of Area Median Income (AMI) or below. Of these households, nearly 70 percent experience at least one or more housing problems as defined by HUD. Renters make up 50 percent of those experiencing one or more housing problems.

The area of greatest need is among renters in the extremely low-income category: 30,485 households, or 45 percent, experience substandard housing, overcrowding, or cost burden. Of those, 69 percent suffer from a cost burden of greater than 50 percent of income.

Cost burden is a significant issue for homeowners earning less than 100 percent of AMI. Of those with a housing problem, 85 percent are cost burdened; 41 percent are paying more than 50 percent of their incomes in housing costs.

Small family households make up the largest proportion of extremely-low (34%), and low-income (33.9%) households. Households with at least one person between the ages of 62 and 74 have the next highest proportion of extremely-low (20%) and low-income (23%) households.

There are 86,275 single-person households in the Contra Costa HOME Consortium. There are households with at least one member 65 years or older. Of these households, 57 percent are low-income. Because many elderly live alone, it is probable that many one person households are elderly. In addition, most of the elderly homeowners live in older homes with deferred maintenance and in need of rehabilitation.

According to HUD, disproportionate need refers to any need that is more than ten percentage points above the need demonstrated for the total households. The Contra Costa Consortium has 384,593 households, 184,698 of which have incomes below AMI. The number of households below AMI with a housing problem is 123,595, which represents about 67 percent of below-AMI households. While all racial/ethnic groups at particular income levels experience housing problems, there are three groups experiencing disproportionate housing need throughout the income spectrum. At the extremely low-income range (0-30 percent AMI) 85 percent of all extremely low-income households have a housing need, while 99 percent of American Indian/Alaska Natives experience a disproportionate need. At the low-income range

(30-50 percent AMI), 75 percent of all low-income households experience a housing need, while 94 percent of Pacific Islander and 86 percent of Black/African American households experience a disproportionate housing need. At the moderate-income range (50- 80 percent AMI), 60 percent of all moderate-income households have a housing need; however, there is no particular group experiencing a disproportionate need compared to the total moderate-income households. At median income (80-100 percent AMI), 45 percent of all households have a housing need, while both American Indians/Alaska Natives (56 percent) and Pacific Islanders (75 percent) experience a disproportionate housing need.

The number of Contra Costa HOME Consortium households with a severe housing problem is 74,722, which represents about 40 percent of all households below 100 percent AMI. While all racial/ethnic groups experience housing problems at particular income levels, there are three groups experiencing disproportionate housing need throughout the income spectrum. At the extremely low-income range (0- 30 percent AMI), 72.2 percent of all households have a severe housing need, and 79 percent of Hispanics experience a disproportionate need. At the very-low income range (30-50 percent AMI), 44.9 percent of all households experience a housing need, while 89 percent of Pacific Islanders experience a disproportionate severe housing need. At the low-income range (50-80 percent AMI), 23.9 percent of all households experience a housing need, while 32 percent of Pacific Islanders experience a disproportionate housing need. At the median income range (80-100 percent AMI), 13.7 percent of all households have a housing need, while 20.3 percent of Pacific Islanders experience a disproportionate severe housing need.

Per HUD definitions, a "disproportionate need" exists when any group has a housing need that is 10% or higher than the jurisdiction as a whole. A household is considered cost burdened when they are paying more than 30% of their income towards housing costs, including utilities. A household is considered severely cost burdened when they are paying more than 50% of their income towards housing costs, including utilities. In Contra Costa, 39% of all households are either cost burdened, or severely cost burdened. Both Black/African Americans (9,628 households, 28.6%) and Pacific Islanders (1,371 households, 29.1%) experience disproportionate severe cost burden.

There are 44,763 households with incomes at or less than 30 percent of the AMI with a housing problem. American Indians, Alaska Natives (335 households, 96 percent) have a disproportionate need. There are 34,062 households with incomes between 30 and 50 percent of the AMI with a housing problem. Black/African American (4,242 households, 86 percent) and Pacific Islanders (175 households, 95 percent) have a disproportionate need in this income category. There are 28,744 households with incomes between 50 and 80 percent of the AMI with a housing problem. There are no racial or ethnic groups that have a disproportionate need within this income category.

There are 37,878 households with incomes at or less than 30 percent of the AMI with a severe housing problem. Hispanics (10,728 households, 78 percent) have a disproportionate need. There are 20,372 households with incomes between 30 and 50 percent of the AMI with a housing problem. Pacific Islanders (165 households, 89 percent) have a disproportionate need. There are 11,574 households with incomes between 50 and 80 percent of the AMI with a housing problem. There are no racial or ethnic groups that have a disproportionate need.

46.2% of the County's renter households live in overcrowded housing. Among racial and ethnic groups reported in the Census, Latino/Hispanic households are most likely to live in crowded conditions in the County with 12.8% in such conditions.

According to 2010 U.S. Census Data, the population of seniors 65 and older from 2000 to 2010 increased from 107,272 to 130,432 in Contra Costa County, an increase of 21.5 percent. According to the American Community Survey (2013-17), 24 percent of households were headed by seniors. Three jurisdictions with the largest share of senior households are Walnut Creek (40.9 percent), Moraga (35.3 percent), and Orinda (35.2 percent) (ACS Data 2013-2017). Of the total County's senior population, nearly 34 percent have a disability limitation. Of all the jurisdictions in the County, San Pablo (44.1 percent), Pittsburg (43.1 percent), and Oakley (41.5 percent) have the highest share of senior populations living with disabilities.

There are only approximately 10,200 assisted rental units affordable to lower-income households, of which, over 950 are at risk of converting to market rate housing. Over 7,000 beds in 473 residential care facilities are available for individuals with special needs, (such as frail elderly and persons with disabilities) who cannot live independently in conventional housing. However, this is significantly less than the population of frail elderly, disabled, and others who may need a supportive housing environment.

Due to the ongoing gap in the availability of affordable housing, the County Consortium has assigned a high priority to new housing construction, homeownership assistance, and housing rehabilitation, particularly for households earning less than 50 percent of the area median income.

Two final measures of need are seen in HACCC's most recent housing choice voucher and public housing wait list openings. In November 2008 the voucher wait list opening attracted nearly 40,000 families who applied for 6,000 positions on the wait list. In addition, over 45,000 households are waiting for Project-Based Voucher units. In March 2017, nearly 17,000 families applied for the wait list for HACCC's 963-unit public housing program.

The 2025-2030 Consolidated Plan has not been released yet to provide updated data to the 2020-2025 Consolidated Plan. Affordable Housing needs remain greater than ever with the continuing rise in housing costs across all areas of Contra Costa County.

B.2 New Activities:

- a) **HOPE VI or Mixed Finance Modernization or Development.** HACCC will continue to work with CSG Advisors and other consultants in order to identify funding mechanisms to rehabilitate or redevelop all of its public housing properties. HACCC's goal is to preserve or increase the number of housing units affordable to public housing eligible families (regardless of whether they remain public housing specifically) and to provide adequate funding for these units over the long term. HACCC continues to evaluate and consider its options for development and preservation of its public housing portfolio. Addressing its needs may include applying for additional RAD, Choice Neighborhoods, a Phase II Energy Performance Contract or any other appropriate HUD programs. HACCC has already been awarded RAD funding for 214 units at Las Deltas in North Richmond (CA011-006, CA011-009A, CA011-009B). HACCC may also seek state and local funding through bonds, tax credits or any other available programs.

The HACCC has recently completed a demolition action for 134 units at the Las Deltas (CA006 and CA009A) property in North Richmond and approved for a disposition application for the remaining of the 80 units at Las Deltas(CA009b) in North Richmond. 107 units were disposed through the RAD Conversion process and a separate application process was completed for demolition and disposition of those 107 units and corresponding release of the DOT.

Timeline: An application for demo/dispo of the RAD units was approved through HUD's Special Applications Center in October of 2019. Demolition of the units in properties 006 and 009A for the non-RAD units was completed in October of 2020. HACCC plans to issue a Request For Proposals from developers to submit suggestions for the development of the contiguous site of the property with an expectation to enter into an Exclusive Negotiating Agreement with the submitter with the best proposal after getting community input on the proposed development plans. 81 occupied units were assisted with relocation services and all units are now vacant.

- b) **Conversion of Public Housing.** HACCC continues to work with consultants in order to identify funding mechanisms to rehabilitate or redevelop all of its public housing properties. An analysis completed by CSG showed that a viable plan does not exist to adequately fund rehabilitation and ongoing maintenance at any of HACCC's public housing properties, HACCC may submit voucher conversion applications for any of its public housing properties. HACCC also may submit applications to HUD for any other conversion funding programs that become available. It is expected that the next projects for consideration to convert to Project Based assistance will be El Pueblo in Pittsburg and Bayo Vista in Rodeo, CA.
- c) **Homeownership.** HACCC currently offers a homeownership voucher program.
- d) **Project-based Vouchers.** HACCC has already committed 1872 project-based vouchers (PBV). In addition, HACCC has approved 288 RAD PBV units for thirteen projects, including one under the RAD 2 component for conversion of a Mod Rehab Single Room Occupancy property and two from the City of Richmond. The RAD PBVs are replacement housing for units removed from the public housing inventory at Las Deltas and the Richmond Housing Authority's Public Housing disposition. The use of PBVs is consistent with HACCC's PHA Plan. Among HACCC's goals are to expand the supply of assisted housing and to increase assisted housing choices. By utilizing PBVs from HACCC, developers are able to leverage funding and produce additional units of new or modernized affordable housing. HACCC plans to award PBV funding throughout its jurisdiction in order to provide affordable housing options for clients in as broad a geographic area as possible. HACCC may also utilize PBVs in any other public housing redevelopment/repositioning projects it may undertake. In addition, not included in the above count, 75 additional PBVs were awarded under the Veterans Affairs Supportive Housing Program for Existing and New Construction projects as well as 25 PBVs under the Housing Stability Voucher program.
- e) Moreover, it is anticipated that over the course of the next five years, three other sites from Richmond will be converted under RAD or Section 18 Demolition and Disposition that will allocate another 267 PBVs for HACCC to administer.

ATTACHMENT B . 3

HOUSING AUTHORITY OF THE COUNTY OF CONTRA COSTA PROGRESS IN MEETING GOALS OF FIVE YEAR PLAN – 2020 - 2025

Goal: Expand the Supply of Assisted Housing

2020 - 2025 Future Actions

- Continue to offer and leverage project-based vouchers to spur affordable housing development, particularly in conjunction with the County's HOME and CDBG loan programs;
- Seek additional VASH funding. To date, HACCC has been awarded 147 VASH Vouchers and continues to work with VA Medical Center to house veterans;
- Seek to project-base VASH vouchers by identifying developers who may be interested in such funding if it becomes available;
- Continue to work with CSG Advisors in order to identify funding mechanisms to rehabilitate or redevelop all of its public housing properties. If the analysis indicates redevelopment or conversion to RAD or other project-based solutions are viable options, then pursue such funding as a means to spur development of new affordable housing in addition to rehabilitation/preservation of existing public housing;
- Work with the City of Antioch to identify funding to resume the funding of rental rehabilitation loans
- Continue to work with homeless housing and service providers to develop a preference for transitional housing graduates which will be operational in 2018;
- Seek any HUD funding for additional units that becomes available.
- Seek other relevant housing funds that become available.

Progress Report:

- Received 4 RAD awards for Las Deltas property to convert the 214 units to project-based vouchers that can be leveraged to develop a greater number of new units.
- Awarded 185 units of project-based vouchers (PBV) and 119 units of Rental Assistance Demonstration (RAD) PBV to 11 projects throughout Contra Costa County. These vouchers (including the project-based vouchers) helped fund 591 units of new affordable housing.
- Awarded a new round of 388 PBVs to 17 projects throughout Contra Cost County. These vouchers, including the PBVs, helped fund 1265 additional units of affordable housing for Contra Costa County. 138 units are part of a Richmond Housing Authority Public Housing disposition action. Total PBVs assisted to date = 2177.
- Continue to partner with County to maximize utilization of CoC Rental Assistance Program, formerly known as the Shelter-Plus Care program. Now serves over 260 households.
- Housed nearly 292 veteran households through the VASH program. Total award to date is 478 VASH Vouchers.
- Awarded an additional 75 VASH PBV vouchers to 4 projects under the Existing and

New Construction components of the PBV program.

- Awarded 85 Fair Share Vouchers. These vouchers are not “special use vouchers” and so this funding allowed the HACCC to issue vouchers to families from the Housing Choice Voucher waiting list.
- Awarded 41 Stability Vouchers. These Vouchers will be used to assist households who are homeless, at-risk of homelessness and those fleeing or attempting to flee domestic violence dating violence, sexual assault, stalking, or human trafficking. 25 of which are Project-Based in partnership with the County’s Health, Housing and Homeless Services Department.
- Awarded 26 Foster Youth Initiative for Independence (FYI). These vouchers allow the HACCC to issue vouchers to youth under the age of 25 with a history of child welfare involvement for up to 36 months.
- Leased newly-discovered 10 Family Unification Program subsidies to Youth exiting Foster Care.
- Transitioned a 11-unit HUD Multi-Family housing development to Enhanced Vouchers.
- Successfully placed 10 household into the HCV Homeownership Program with three additional households actively searching for homes for a total of 13 households to date.
- Maintained average occupancy at most properties to 94% or better. Working to increase this to an average of 98% or better.
- Housed 211 households in the Mainstream program for non-elderly disabled households.
- Received and housed 201 Emergency Housing Vouchers to assist households in Permanent Supportive Housing and County Shelters transition to permanent housing and thus making slots available for unsheltered families to move to shelters and sheltered households to move to Permanent Supportive Housing.

Goal: Improve the Quality of Assisted Housing

2020-2025 Future Actions

- Seek to re-establish the De-concentration Bonus in SEMAP;
- Utilize increased site presence by managers to encourage formation of more resident councils;
- Utilize increased site presence by managers to hold more frequent meetings with tenants;
- Increase and improve common area lighting in all housing communities;
- Continue funding additional police/Sheriff patrols as long as budget permits;
- Continue to work with law enforcement to improve response time;
- Increase use of surveillance cameras as needed;
- Seek funding to have Security Services at public housing sites in East County
- Seek grants or other funding that will facilitate expanded services for HACCC's clients;
- Seek partnerships with local community agencies to increase and strengthen services offered to public housing tenants and voucher clients;
- Continue to improve and enforce public housing screening policies and procedures.
- Public Housing to begin the scanning “day-forward” documents project. This tool streamlines the processing of incoming paper documents sent by participants to their HACCC assistance teams during annual recertification, interim income changes and initial leasing.

Progress Report:

- HACCC anticipates utilizing approximately \$2.6 million of HUD funding for a variety of modernization improvements at all its public housing developments. Specific improvements include:
 - Gas line and plumbing upgrades at the Los Nogales development.
 - Phase 2 modernization of Alhambra Terrace development.
 - Continuous repairs and replacement of concrete walk and driveways at various properties.
 - New appliances at various properties to replace aging appliances.
 - Window upgrades during unit turnovers.
 - New styles of interior finishes are being utilized in public housing units to upgrade the appearance of units so that they more closely emulate market-rate units.
 - Ongoing tree trimming/removal at all sites;
 - Completed demolition of the contiguous Las Deltas campus in preparation for redevelopment.
 - Phased reroofing of the Bayo Vista development.
 - Replacement of heating system at the Hacienda development.
 - Physical Needs Assessment of all public housing developments.
 - Foundation stabilization projects at the Alhambra Terrace and Los Nogales developments.
 - Repair of heavily fire-damaged units at the Elder Winds, Los Nogales, Casa de Manana, Bayo Vista and Bridgemont developments.
 - Installed new smoke/carbon monoxide detectors in all public housing units.
 - Repair electrical infrastructure at the Bayo Vista development.
 - Surveyed all balconies in public housing units for structural integrity per State law.
 - Engineering of Kidd Manor boiler replacement system.
- Lighting improvements in the common areas at Vista del Camino and Bayo Vista are underway.
- Roof replacement in 30 buildings at Bayo Vista have already been completed. As funding allows, throughout the 12 Public Housing developments, we are replacing windows during unit turns.
- Established relationships with Brentwood PD and Oakley PD to promote safety and security in our communities.
- In conjunction with the City of San Pablo, infrastructure improvements have been completed near Vista del Camino and Kidd Manor.
- Apart from Las Deltas, every public housing property now has an average occupancy rate that is at or above 94%;
- Work order turnaround times continue to improve through the implementation of new processes.
- Continue to operate medical office in the Bayo Vista development in collaboration with Life Long Medical services.
- PASS scores for public housing unit inspections continue to meet expectations.
- 95 percent of HACCC paper tenant files were converted for storage in the electronic record management software implemented this year. The HACCC is on track to convert all paper files to electronic records by the end of 2024 or early 2025. This initiative improves data security and allows the HACCC to redirect labor hours from administrative duties to direct tenant services.

- The Housing Choice Voucher program began scanning “day-forward” documents to the existing electronic tenant file via barcode. This tool streamlines the processing of incoming paper documents sent by participants to their HACCC assistance teams during annual recertification, interim income changes and initial leasing.
- The Housing Choice Voucher program began automated phone call campaigns notifying tenants and landlords of upcoming inspections. Preliminary data suggests that this initiative increases the rate of repairs prior to the inspection date and decreases the rate of “no-shows”.
- The Housing Choice voucher program has registered over 3360 new tenant and landlord accounts for our online self-service portals since January of 2023. Additionally, the HACCC has made annual recertification workflows available within this online portal for the first group of HCV participants.
- The HACCC has completed configuration of call center software which will modernize our agency phone system, improve call routing, and improve response times when implemented.
- Transition of the Housing Choice Voucher department workflow management tools to SharePoint began. This will create a more stable and reliable workflow management tool that is able to leverage existing business software data seamlessly. This will improve the reliability and stability of the workflow management tools, streamline service delivery, and improve response times for incoming inquiries.

Goal: Provide an Improved Living Environment

2020-2025 Future Actions

- Improve security and safety at Public Housing sites
- Increase access to early childhood development programs such as Head Start
- Coordinate with Contra Costa County Services to include Public Housing residents
- Facilitate and secure on-site medical clinics where feasible
- Strive to include more program participants in agency policies and procedures development

Progress Report:

- Provide continuous funding for police/Sheriff patrols at two public housing communities.
- Continue to work with several County and local agencies to coordinate funding to increase programs at public housing properties.
- Continue to coordinate communication between management staff and sheriff and local law enforcement officers at public housing properties.
- Successfully applied for grants for camera systems at our public housing developments. \$208,607 grant was awarded in 2024.
- Successfully increase the number of RAB members and included HCV participants for the first time ever.
- Expanded RAB meetings to be held virtually with the goal to meet in person next year.
- Collaborate with our commissioner to reinstate youth activities in El Pueblo Housing Development that were closed due to Covid-19. The Center will provide a variety of activities including recreational, afterschool program and library programs.

- Partnered with the County to offer Head Start facilities at three public housing properties.
- Continued operation of a variety of social, nutrition and service programs at our properties.
- Providing medical services to public housing and low-income residents of the Rodeo area, through a new medical office operated by Lifelong Medical at the Bayo Vista Development.
- Established a partnership with John Muir Mobil Clinic to provide medical services to the community at El Pueblo.
- Launched our first book fair at our El Pueblo Development in partnership with CC Library, Tandem, and Book Rich Environment.
- Replaced the automatic entrance gate at Casa de Serena and provided all residents with new access code to improve safety.

Goal: Promote Self-sufficiency and Asset Development of Assisted Households

2020-2025 Future Actions

- Continue to operate HACCC's self-sufficiency programs despite surpassing HUD's participation/graduation requirements;
- Expand voucher self-sufficiency services (if not escrow accounts) to public housing tenants where feasible;
- Seek other funding that will facilitate expanded services for HACCC's clients;
- Expand the FSS Program Coordinating Committee (PCC) to seek partnerships with local community agencies to increase and strengthen services offered to public housing tenants and voucher clients;
- Provide or attract supportive services designed to improve resident employability;
- Provide or attract supportive services to increase independence for the elderly or families with disabilities;
- Continue existing policies that permit voucher homeownership;
- Continue to enforce the Community Services Requirements policy;
- Provide Section 3 employment and training opportunities for residents where feasible

Progress Report:

- Since January of 2020, HACCC had 95 participants graduate from its FSS Program with \$1,674,837 in escrow.
- Employed Section 3 hires through construction contracts, employment training and jobs programs, or direct hires in a variety of contracts.
- Partnered with Kaiser Permanente School of Allied Health Sciences to provide access to the Phlebotomy Program by granting FSS participants funds for tuition, fees, and a stipend.
- Partnered with Contra Costa College, Opportunity Junction, and Martinez Adult Education to develop MOUs that aligns common goals for self-sufficiency for low income families in Contra Costa County;

- Continued partnerships with the Workforce Development Board, Humanity Way, and Habitat for Humanity to provide career and financial counseling to low-income families in Contra Costa County;
- Continue to promote partnerships with Public Housing tenants and Voucher recipients to be hired as Section 3 employees to help maintain landscaping services to HACCC's properties.
- Partnered with Healthy Hearts to bring senior services at Hacienda and Kidd Manor.
- Engaged with former Las Deltas residents to have access to home ownership opportunities in partnership with non-profit developers purchasing scattered sites at Las Deltas for below market prices.

Goal: Ensure Equal Opportunity in Housing

2020-2025 Future Actions

- Provide updated fair housing and ADA training for all staff.
- Provide updated training on the Violence Against Women Act for all staff.
- Provide updated training on Limited English Proficiency requirements for all staff.
- Continue to expand network of service providers who can assist with outreach for day-to-day client services, wait list openings and other events.
- Work with network of social service providers to conduct outreach to families and individuals who are disabled, homeless or who have limited English proficiency when HACCC open its HCV and public housing wait lists.
- Continue providing services in multiple languages as appropriate.
- Review and revise HACCC's existing reasonable accommodation policies and procedures as needed.

Progress Report:

- Continued to Update Reasonable Accommodation forms and procedures with ongoing training to all staff, including our Maintenance team.
- Ongoing training on Violence Against Women's Act and updating of Program forms.
- Continue to train on Limited English Proficiency requirements for all HCV and public housing managers.
- Continue to use other external and internal legal providers to conduct Fair Housing training for staff.

**Annual Statement /
Performance and Evaluation Report**
Part I: Summary
Capital Fund Program (CFP)

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

3843480

Capital Fund Program Grant Number

101522

OMB Approval No 2577-0274 (Exp 07/31/2017)
FFY of Grant Approval

2025

Housing Authority of the County of Contra Costa

Original Annual Statement Reserve for Disaster/Emergencies Revised Annual Statement/Revision Number 1 Performance and Evaluation Report for Program Year Ending ___

Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
1	Total Non-CGP Funds				
2	1406 Operations (May not exceed 25% of line 20)	\$986,250	\$0	\$0	\$0
3	1408 Management Improvements Soft Costs	\$394,500	\$0	\$0	\$0
	Management Improvements Hard Costs				
4	1410 Administration	\$394,500	\$0	\$0	\$0
5	1411 Audit	\$2,000	\$0	\$0	\$0
6	1415 Liquidated Damages				
7	1430 Fees and Costs	\$384,348	\$0	\$0	\$0
8	1440 Sale Acquisition				
9	1450 Site Improvement	\$384,348	\$0	\$0	\$0
10	1460 Dwelling Structures	\$745,665	\$0	\$0	\$0
11	1465 1 Dwelling Structures - Nonseparable	\$115,304	\$0	\$0	\$0
12	1470 Non Dwelling Structures	\$499,652	\$0	\$0	\$0
13	1475 Non Dwelling Equipment	\$38,435	\$0	\$0	\$0
14	1485 Demolition	\$0	\$0	\$0	\$0
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495 1 Relocation Costs	\$0	\$0	\$0	\$0
18	1498 Mod Used for Development	\$0	\$0	\$0	\$0
19	1502 Contingency (may not exceed 8% of line 20)	\$0	\$0	\$0	\$0
20	Amount of Annual Grant (Sum of lines 2 - 19)	\$3,945,002	\$0	\$0	\$0
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Compliance				
23	Amount of line 20 Related to Security				
24	Amount of line 20 Related to Energy Conservation Measures				
			\$0		\$3,945,002.00

Signature of Executive Director and Date

Signature of Public Housing Director/Office of Native American Programs Administrator and Date

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

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

Development Activity Name HA - Wide Activities	General Description of Major Work Categories	Development Account Number	Quantity	Total Estimated Cost		Total Actual Cost	
				Original	Revised	Funds Obligated	Funds Expended
PHA Wide Operations	Total for Account 1406	1406		\$986,250	\$0	\$0	\$0
				\$986,250	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
PHA Wide Management Improvements Property Security in dispersed units	Total for Account 1408	1408		\$394,500	\$0	\$0	\$0
				\$394,500	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
PHA Wide Administration Technical and Non-Technical Salaries & Benefit	Total for Account 1410	1410		\$394,500	\$0	\$0	\$0
				\$394,500	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
PHA Wide Audit	Total for Account 1411	1411		\$2,000	\$0	\$0	\$0
				\$2,000	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
PHA Wide Parks and Recreation Project Management, Planning Costs Prioritized annual amount posted	Total for Account 1430	1430		\$384,348	\$0	\$0	\$0
				\$384,348	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
CA-011001 Site Improvements Landscape Improvements	Total for Account 1450	1450		\$384,348	\$0	\$0	\$0
				\$384,348	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
CA-011003 Site Improvements Landscape Improvements	Total for Account 1450	1450		\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
CA-011004 Site Improvements Landscape Improvements	Total for Account 1450	1450		\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
CA-011005 Site Improvements Landscape Improvements	Total for Account 1450	1450		\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0

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

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

Development Number / State HA - Wide Activities	General Description of Major Work Categories	Development Account Number	Quantity	Total Estimated Cost		Total Actual Cost	
				Original	Revised	Funds Obligated	Funds Expended
				\$0	\$0	\$0	\$0
CA-011008	Site Improvements -Landscape Improvements	1450		\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
Total for Account 1450				\$0	\$0	\$0	\$0
CA-011009	Site Improvements -Landscape Improvements	1450		\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
Total for Account 1450				\$0	\$0	\$0	\$0
CA-011010	Site Improvements -Landscape Improvements	1450		\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
Total for Account 1450				\$0	\$0	\$0	\$0
CA-011011	Site Improvements -Landscape Improvements	1450		\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
Total for Account 1450				\$0	\$0	\$0	\$0
CA-011012	Site Improvements -Landscape Improvements	1450		\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
Total for Account 1450				\$0	\$0	\$0	\$0
CA-011013	Site Improvements -Landscape Improvements	1450		\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
Total for Account 1450				\$0	\$0	\$0	\$0
CA-011014	Site Improvements -Landscape Improvements	1450		\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
Total for Account 1450				\$0	\$0	\$0	\$0
CA-011015	Site Improvements -Landscape Improvements	1450		\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
Total for Account 1450				\$0	\$0	\$0	\$0
CA-011016	Site Improvements -Landscape Improvements	1450		\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
Total for Account 1450				\$0	\$0	\$0	\$0

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

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

Development Number / Home IAs - Title Activities	General Description of Major Work Categories	Development Account Number	Quantity	Total Estimated Cost		Total Actual Cost	
				Original	Revised	Funds Obligated	Funds Expended
CA-011001	Dwelling Structures -Unit Interior Modernization	1460		\$0	\$0	\$0	\$0
				\$745,065	\$0	\$0	\$0
Total for Account 1460				\$745,065	\$0	\$0	\$0
CA-011003	Dwelling Structures -Unit Interior Modernization	1460		\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
Total for Account 1460				\$0	\$0	\$0	\$0
CA-011004	Dwelling Structures -Unit Interior Modernization	1460		\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
Total for Account 1460				\$0	\$0	\$0	\$0
CA-011005	Dwelling Structures -Unit Interior Modernization	1460		\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
Total for Account 1460				\$0	\$0	\$0	\$0
CA-011010	Dwelling Structures -Unit Interior Modernization	1460		\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
Total for Account 1460				\$0	\$0	\$0	\$0
CA-011011	Dwelling Structures -Unit Interior Modernization	1460		\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
Total for Account 1460				\$0	\$0	\$0	\$0
CA-011012	Dwelling Structures -Unit Interior Modernization	1460		\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
Total for Account 1460				\$0	\$0	\$0	\$0
CA-011013	Dwelling Structures -Unit Interior Modernization	1460		\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
Total for Account 1460				\$0	\$0	\$0	\$0
CA-011015	Dwelling Structures			\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
Total for Account 1460				\$0	\$0	\$0	\$0

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

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

Development Number / Name NA - Urban Activities	General Description of Major Work Categories	Development Account Number	Quantity	Total Estimated Cost		Total Actual Cost	
				Original	Revised	Funds Obligated	Funds Expended
CA-011017	-Unit Interior Modernization	1460	Total for Account 1460	\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
CA-011018	-Unit Interior Modernization	1460	Total for Account 1460	\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
CA-011096	-Unit Interior Modernization	1460	Total for Account 1460	\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
PIA 1162	Dwelling Equipment Accessibility Improvements Non Dwelling Equipment Demolition Relocation Costs Contingency	1465, 1 1470 1475 1485 1495, 1 1502	Total for Account 1460	\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
				\$0	\$0	\$0	\$0
Totals				\$3,345,002	\$0	\$0	\$0

(1) To be completed for the Signature of Executive Director and Date

(2) To be completed for the Signature of Public Housing Director/Office of Native American Programs Administrator and Date

**Annual Statement /
Performance and Evaluation Report
Part III: Implementation Schedule
Capital Fund Program (CFP)**

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

OMB Approval No. 2577-0274 (Exp. 07/31/2017)

Development Number / Name NA - Wide Activities	All Funds Obligated (Quarter Ending Date)			All Funds Expended (Quarter Ending Date)			Reasons for Revised Target Dates (2)
	Original	Revised	Actual	Original	Revised	Actual	
To be completed for the Performance and Evaluation Report or a Revised Annual Statement.							
Signature of Executive Director and Date				(2) To be completed for the Performance and Evaluation Report			
				Signature of Public Housing Director/Office of Native American Programs Administrator and Date			

ATTACHMENT C.1. Resident Advisory Board Comments

RAB Meeting

October 3, 2024

RAB Meeting Comments

Question:

Timothy Stelly: If a person looking for housing with a voucher and he has been given a couple of extensions, will his housing search be limited to contra Costa County, or could he look to another county say San Joaquin?

Answer:

All vouchers generally require you to lease up for the first time in Contra Costa for 12 months. After that you can go anywhere you want.

Question:

Lanita Mims: Are there any changes that be made or any updates to the home ownership program?

Answer:

There were last year, nothing this year. The current administrative plan that we have on our website has all the updates to our home ownership program that are currently active and running.

Question:

Deborah Drake: Is public housing eventually going away? What does that look like.

Answer:

There may be a relocation factor involved where we take all the families that live in a certain property move them here a minute while we completely renovate all this and then we bring them all back into the units. The only difference is when they come back its going to be under the housing choice voucher program not under the public housing program and that the general plan for all of them.

RAB Meeting

October 10, 2024

RAB Meeting Comments

Question:

How the housing authority has the ability to protect themselves against fraud when it comes to the rules and regulations

Answer:

That is an excellent question. With the VAWA protection the thought is who are we to question when somebody is claiming protections under violence against women act, however we know our clients, we know the communities, we have history more or less so we are allowed to do is to request supporting documentation when there's conflicting information. So that we are allowed to do. It is a little bit tricky, so we do consult with our legal team most of the time. Sometimes it's obvious like um no we keep seeing this person there and but then there's nothing else that you're doing despite the fact we've been having conversations and connected you to resources to help. It is a two-way street. We want to protect you, but we also need you to be as cooperative as well to help us with that.

Question:

Timothy Stelly: I was interested in knowing was in terms of violence women in housing authorities can help them get a restraining order. What are the policies on that? How much can the housing authority participate in that?

Answer:

That's an excellent question. We don't necessarily are the ones helping them get the restraining order, but we do connect them to organizations or even attorneys we do have Bay Area legal aid that that's what they are there for to provide legal assistance on how to navigate on how to do these things.

Question:

JoAnn: I was told dogs can't weight more 25 pounds or over. Is that true?

Answer:

Yea, I mean we have different, not different rules. We have our pet policy rule that you can have a pet under 25 pounds, and it can ether be a cat or a dog or a fish. Its very specific for what the pet policy says. However, if it's under a reasonable accommodation due to a verified disability then that's where accommodation is an exception to the rule.

Question:

JoAnn: Proposition 33?

Answer:

Can't talk about this here.

RAB Meeting

October 17, 2024

RAB Meeting Comments

Question:

Deborah Drake: How do you guys know where to spend the most money on where the units need the most repairs?

Answer:

That's a good question, so we have a document called a physical needs assessment that's done every ten years where we have professionals come in and look at all our properties and exam them, inspect them and look at the history of the developments when they were last had a new roof for example or when they last had new kitchen cabinets that type of thing. That helps guide us, sometimes it's something that changes and code requirements, like a few years ago we had to install carbon monoxide detectors combination smoke detectors and carbon monoxide detectors because the code required that. You know sometimes things pop up like that, that we did not see coming because of physical needs assessment or planning but they just come up. So, there's a number of different ways that we determine what modernization needs are necessary. I laid out a couple of those but then some others are for example we have a few units right now in Elder Winds that have had a couple of fires so were going to be rebuilding those units and bringing them back up to a newer standard that is considered modernization there foundation repairs that we've made and are continuing to make at these properties so there's things that come to our attention, sometimes it could be maintenance department that brings things to our attention that we weren't aware of.

Question:

Cynthia: How do you go about the sprinkler system needing to be repaired, how do you put that in the budget?

Answer:

The capital fund gives out roughly around 3.9 million dollars a year but, we have huge back log of need for funding that we do not get for public housing and every year we have to make tough choices about what were going to do and what were not going to do and unfortunately irrigation systems have suffered for a number of years there's been a good number of years we've not been able to put any real money into repair and upkeep into irrigation systems and that's really unfortunate but its much more important to have roofs that don't leak and stoves and refrigerators that work and windows that aren't broken those sort of things and I hope that you understand our position on that.

Question:

Timothy Stelly: When will the final budget be in?

Answer:

Usually it happens, well it depends on when congress passes the budget. It really does fluctuate it can be early spring it can be as early as March, I've seen it happen as late as May but its usually sometime during the spring that we know and then as soon as I know, then I tweak these numbers.

Question:

Timothy Stelly: Is there like a 10-year plan for El Pueblo in particular?

Answer:

So we do have the physical needs assessment for El Pueblo and there are items in that physical needs assessment that will need to be addressed during that 10-year period.

Question:

Timothy Stelly: What they did with the old medonis project in Bya Point is it like that or is the program still in affect?

Answer:

That's a great question, I don't have a definitive answer other than yeah, the goal or the long-term future is to convert just because realistically as you know your buildings are from the 50s you know we don't have enough capital funds to perhaps sub stain or to make all the repairs necessary so there's other options you know that utilizes conversions opportunities.

Question:

Lanita Mims: What about fundraising?

Answer:

I'm not sure about the fundraising but I think its looking into funding opportunities and sometimes that comes in the form of grants.

Question:

Cynthia: You have contracts with Pittsburg PD for El Pueblo, right? Does the Sheriff department have a contract with Las Deltas?

Answer:

That's correct, we use to have 3 contracts with law enforcement we use to have one specifically for Las Deltas, the sheriff's, we still have contracts with the sheriffs for our Rio Vista community and then for the Pittsburg development as well. Las Deltas we were no longer able to fund it just because we lost the property funding for that.

RAB Meeting

October 24, 2024

RAB Meeting Comments

Question:

Saleemah Alhark: Regarding the Kaiser phlebotomy program has that started yet? Or is that something you guys are presenting to the board?

Answer:

That's something we're still working out the details the MOU has been signed but I don't believe it has formally been launched one of the things that has to happen is word has to go out to the FFS participants and let them know this is a new thing that we have available for them to sign up for then they register and sign up for and start taking classes with Kaiser so all of this is coming down here. I think it's going to be in place before the start of the fiscal year on April 1st, so sometime in the next couple of months.

Question:

Saleemah Alhark: If someone graduated from the FFS program does that mean they will not be able to participate in the phlebotomy program?

Answer:

The Kaiser phlebotomy is a cohort, so they start on a specific schedule so we're aiming for February or April cohorts and as Tony said there be a specific method of outreach, to get to your point though is it available to folks that have graduated. The way that the agreement with the instructors that we would be able to provide certain funding that requires ensures that you have to be on the evident program because we're funding the enrollment of those participants with FFS escrow money and there's certain contingencies with that funding and you have to be certainly enrolled in the FFS program.

Question:

Saleemah Alhark: The homeowner's program, is that only for current FFS participants or can anyone?

Answer:

So normally we require that you participate in the FFS program to use your voucher for homeownership. If you graduate, then you don't have that requirement you can participate in homeownership.

**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 3/31/2024

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

I, Gabriel Lemus, the Assistant Deputy Director
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years 2025-2030 and/or Annual PHA Plan for
fiscal year 2025 of the Housing Authority of the County of Contra Costa is
consistent with the *PHA Name*

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair
Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

CONTRA COSTA COUNTY

Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or
State Consolidated Plan.

The Consolidated Plan is created and implemented with the input of the Housing Authority and its
residents. Both plans address the services available to low and very low income households and
how each agency is providing affordable housing to low-income and very-low income residents.

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:

Gabriel Lemus

Title:

Assistant Deputy Director

Signature:



Date: 11/04/2024

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. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year 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.

**Certifications of Compliance with
PHA Plan 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 3/31/2024

**PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations
including PHA Plan Elements that Have Changed**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the XX 5-Year and/or XX Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 4/2025, 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 (24 CFR § 91.2).
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 (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
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 provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. 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.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include 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 2011-65);

- 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; and
 - 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 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
 11. 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.
 12. 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.
 13. 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.
 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
 15. 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.
 16. 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.
 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
 18. 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.
 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
 20. 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.
 21. 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).

Housing Authority of the County of Contra Costa
 PHA Name

CA011
 PHA Number/HA Code

Annual PHA Plan for Fiscal Year 20 25

5-Year PHA Plan for Fiscal Years 2025 - 2030

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 Executive Director		Name Board Chairman	
Joseph Villarreal		Federal Glover	
Signature	Date	Signature	Date

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. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year 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.