

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

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# PHA Plans

5 Year Plan for Fiscal Years 2000 - 2004

Annual Plan for Fiscal Year 2000

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

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HUD 50075  
OMB Approval No: 2577-0226  
Expires: 03/31/2002

**PHA Plan  
Agency Identification**

**PHA Name:** Housing Authority of the City of Alameda

**PHA Number:** CA062

**PHA Fiscal Year Beginning:** 07/2000

**Public Access to Information**

**Information regarding any activities outlined in this plan can be obtained by contacting:  
(select all that apply)**

- Main administrative office of the PHA
- PHA development management offices
- PHA local offices

**Display Locations For PHA Plans and Supporting Documents**

The PHA Plans (including attachments) are available for public inspection at: (select all that apply)

- Main administrative office of the PHA
- PHA development management offices
- PHA local offices
- Main administrative office of the local government
- Main administrative office of the County government
- Main administrative office of the State government
- Public library
- PHA website
- Other (list below)  
Office of the Esperanza Resident Management Council

PHA Plan Supporting Documents are available for inspection at: (select all that apply)

- Main business office of the PHA
- PHA development management offices
- Other (list below)



**5-YEAR PLAN**  
**PHA FISCAL YEARS 2000 - 2004**

[24 CFR Part 903.5]

**A. Mission**

State the PHA's mission for serving the needs of low-income, very low income, and extremely low-income families in the PHA's jurisdiction. (select one of the choices below)

- The mission of the PHA is the same as that of the Department of Housing and Urban Development: To promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.
- The PHA's mission is: (state mission here)

The Housing Authority of the City of Alameda, in partnership with the entire community, advocates and provides quality, affordable safe housing, and encourages self-sufficiency and strengthening community inclusiveness and diversity in housing.

**B. Goals**

The goals and objectives listed below are derived from HUD's strategic Goals and Objectives and those emphasized in recent legislation. PHAs may select any of these goals and objectives as their own, or identify other goals and/or objectives. Whether selecting the HUD-suggested objectives or their own, **PHAS ARE STRONGLY ENCOURAGED TO IDENTIFY QUANTIFIABLE MEASURES OF SUCCESS IN REACHING THEIR OBJECTIVES OVER THE COURSE OF THE 5 YEARS.** (Quantifiable measures would include targets such as: numbers of families served or PHAS scores achieved.) PHAs should identify these measures in the spaces to the right of or below the stated objectives.

**HUD Strategic Goal: Increase the availability of decent, safe, and affordable housing.**

- PHA Goal: Expand the supply of assisted housing  
Objectives:
  - Apply for additional rental vouchers:
  - Reduce public housing vacancies:
  - Leverage private or other public funds to create additional housing opportunities:
  - Acquire or build units or developments
  - Other (list below)
- PHA Goal: Improve the quality of assisted housing  
Objectives:
  - Improve public housing management: (PHAS score)
  - Improve voucher management: (SEMAP score)

- Increase customer satisfaction:
- Concentrate on efforts to improve specific management functions:  
(list; e.g., public housing finance; voucher unit inspections)
- Renovate or modernize public housing units:
- Demolish or dispose of obsolete public housing:
- Provide replacement public housing:
- Provide replacement vouchers:
- Other: (list below)

- PHA Goal: Increase assisted housing choices

Objectives:

- Provide voucher mobility counseling:
- Conduct outreach efforts to potential voucher landlords
- Increase voucher payment standards
- Implement voucher homeownership program:
- Implement public housing or other homeownership programs:
- Implement public housing site-based waiting lists:
- Convert public housing to vouchers:
- Other: (list below)

**HUD Strategic Goal: Improve community quality of life and economic vitality**

- PHA Goal: Provide an improved living environment

Objectives:

- Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments:
- Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments:
- Implement public housing security improvements:
- Designate developments or buildings for particular resident groups (elderly, persons with disabilities)
- Other: (list below)

**HUD Strategic Goal: Promote self-sufficiency and asset development of families and individuals**

- PHA Goal: Promote self-sufficiency and asset development of assisted households

Objectives:

- Increase the number and percentage of employed persons in assisted families:
- Provide or attract supportive services to improve assistance recipients' employability:
- Provide or attract supportive services to increase independence for the elderly or families with disabilities.
- Other: (list below)

**HUD Strategic Goal: Ensure Equal Opportunity in Housing for all Americans**

- PHA Goal: Ensure equal opportunity and affirmatively further fair housing  
Objectives:
  - Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability:
  - Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability:
  - Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required:
  - Other: (list below)

**Other PHA Goals and Objectives: (list below)**

Guiding Principles:

- a. Our services, policies and staff considerations shall reflect the agency's value for inclusiveness, diversity and culturally sensitive services.
- b. Our agency goals will be achieved by ongoing collaboration with customers and community partners.

**Goal 1: Maintain and expand quality, safe and affordable housing throughout the city of Alameda.**

*Objective:*

- a. Manage the existing 572 rental housing units and the Section 8 program in an efficient and effective manner.
- b. Lease up 200 families (averaging 40 per year) under the Section 8 program. (By June 2005)
- c. Move 20 families into homeownership. (By June 2005)
- d. Develop 50 managed housing units. (By June 2005)
- e. Develop program to add 50 landlords to the Section 8 program making more affordable rental units available. (By June 2002)
- f. Develop an organized strategy to promote and educate the citizens of Alameda on the need for affordable housing in the city. (By June 2001)
- g. Continue to maintain high performer levels in all housing programs.

- h. Continue to modernize housing complexes to improve the basic standard of living for our customers.

**Goal 2: Achieve full potential as an organization through improved communications, work relationships and staff development.**

*Objectives:*

- a. Develop guidelines for improved communications and team practices. (By August 2000)
- b. Develop and implement a formal approach to staff development and career advancement, which includes cross-training, mentoring, constructive feedback, and external development opportunities. (By January 2002)
- c. Develop and implement a training program for managers to develop skills in supporting staff development, managing time, projects, and personnel practices. (By January 2001)
- d. Develop and implement a new model for all agency meetings that elicits more participation in decision-making, encourages greater teamwork and effective communications. (By July 2000)

**Goal 3: Provide the highest quality of service for all our customers.**

*Objectives:*

- a. Formally adopt Principles to Ensure Quality Client Services. (By July 2000)
- b. Implement a system for increasing feedback and communication to inform customers how the Housing Authority is responding to their concerns. (By September 2000)
- c. Develop and implement a program to provide support and training for staff to ensure continued improvement in customer service. (By January 2001)
- d. Design and implement an organized schedule of customer programs and activities that will serve to better coordinate and support quality service. (By September 2000)

**Goal 4: Promote greater family self-reliance and community responsibility.**

*Objectives:*

- a. Develop a program to train residents on home maintenance and repairs. (By October 2000)
- b. Design and implement an organized schedule of programs and activities for customers that will coordinate those programs and activities that promote self-reliance and neighborhood pride. (By September 2000)
- c. Support the development of an effective resident association at Anne B. Diamant Plaza. (By June 2001)
- d. Develop and implement an educational process that aids customers to understand their lease responsibilities and their Family Obligations. (By July 2000)

**Annual PHA Plan**  
**PHA Fiscal Year 2000**

[24 CFR Part 903.7]

**i. Annual Plan Type:**

Select which type of Annual Plan the PHA will submit.

**Standard Plan**

**Streamlined Plan:**

- High Performing PHA**
- Small Agency (<250 Public Housing Units)**
- Administering Section 8 Only**

**Troubled Agency Plan**

**ii. Executive Summary of the Annual PHA Plan**

[24 CFR Part 903.7 9 (r)]

Provide a brief overview of the information in the Annual Plan, including highlights of major initiatives and discretionary policies the PHA has included in the Annual Plan.

The Housing Authority of the City of Alameda has developed four broad goals and developed several quantifiable objectives to be achieved to meet those goals. The Authority's goals are to: 1) Maintain and expand quality, safe and affordable housing throughout the city of Alameda; 2) Achieve full potential as an organization through improved communications, work relationships and staff development; 3) Provide the highest quality of service for all our customers; and 4) Promote greater family self-reliance and community responsibility. The Authority also has developed two guiding principles that will guide staff. These principles are: 1) Our services, policies and staff considerations shall reflect the agency's value for inclusiveness, diversity and culturally sensitive services; and 2) Our agency goals will be achieved by ongoing collaboration with customers and community partners.

The Housing Authority's Annual Plan reflects our mission, goals, objectives and our guiding principles. The Authority has implemented all HUD-mandated changes to the Section 8 and Public Housing programs. Where feasible and where it is believed Alameda residents will best be served, the Housing Authority also has included discretionary policies and procedures. For instance, the Housing Authority has adopted admissions preferences that benefit families living or working in Alameda, whose members are working or in study programs, etc.

To determine housing need, the Housing Authority depended upon information contained in the Consolidated Plan and its waiting list. The Consolidated Plan reflects housing need of Alamedans whereas the waiting list, which was open to anyone, better reflects the housing need for the entire San Francisco East Bay Area.

As a High Performer, the Housing Authority is submitting a streamlined Agency Plan. Because of the interest in homeownership, however, the Authority is completing the optional section of the template that deals with this topic. No other optional sections are completed. As a recipient of Public Housing Drug Elimination Program (PHDEP) funding and Comprehensive Improvement Assistance Program (CIAP), now Capital Fund grants, the Housing Authority has attached its PHDEP Plan and its five-year action plan for Capital Fund.

The Housing Authority of the City of Alameda has exceeded the public display requirements by having this document available in more locations than required. A public hearing is scheduled for March 15, 2000, at which time the 45-day comment period will have expired. Through a series of town hall meetings, all residents of Housing Authority complexes, Section 8 participants and community partners were provided with an opportunity to participate in the strategic planning component of the Five Year Plan. A resident advisory board called the Resident Advisory Committee (RAC) has had the opportunity to participate in this process as well. The RAC has been provided copies of the Five-Year and Annual Plans, all policies and procedures relevant to the Plans and additional materials they have requested. Comments and suggestions from RAC members are included as an attachment to this document. Some suggestions were incorporated. Where they are not, the Housing Authority provides its reasoning for not doing so.

This Agency Plan represents the policies and procedures of the public housing and Section 8 programs of the Housing Authority of the City of Alameda.

**iii. Annual Plan Table of Contents**

[24 CFR Part 903.7 9 (r)]

Provide a table of contents for the Annual Plan, including attachments, and a list of supporting documents available for public inspection.

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**Attachments**

Indicate which attachments are provided by selecting all that apply. Provide the attachment’s name (A, B, etc.) in the space to the left of the name of the attachment. Note: If the attachment is provided as a **SEPARATE** file submission from the PHA Plans file, provide the file name in parentheses in the space to the right of the title.

Required Attachments:

- Admissions Policy for Deconcentration (**Attachment A**)
- FY 2000 Capital Fund Program Annual Statement (**Attachment B**)
- Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)

Optional Attachments:

- PHA Management Organizational Chart
- FY 2000 Capital Fund Program 5 Year Action Plan (**Attachment C**)
- Public Housing Drug Elimination Program (PHDEP) Plan (**Attachment D**)
- Comments of Resident Advisory Board or Boards (**Attachment E**)
- Other (List below, providing each attachment name)

**Supporting Documents Available for Review**

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

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
X	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
X	State/Local Government Certification of Consistency with the Consolidated Plan	5 Year and Annual Plans
X	Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions’ initiatives to affirmatively further fair housing that require the	5 Year and Annual Plans

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
	PHA's involvement.	
X	Consolidated Plan for the jurisdiction/s in which the PHA is located (which includes the Analysis of Impediments to Fair Housing Choice (AI)) and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan: Housing Needs
X	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources;
X	Public Housing Admissions and (Continued) Occupancy Policy (A&O), which includes the Tenant Selection and Assignment Plan [TSAP]	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public Housing Deconcentration and Income Mixing Documentation: <ol style="list-style-type: none"> <li>PHA board certifications of compliance with deconcentration requirements (section 16(a) of the US Housing Act of 1937, as implemented in the 2/18/99 <i>Quality Housing and Work Responsibility Act Initial Guidance; Notice</i> and any further HUD guidance) and</li> <li>Documentation of the required deconcentration and income mixing analysis</li> </ol>	Annual Plan: Eligibility, Selection, and Admissions Policies
	Public housing rent determination policies, including the methodology for setting public housing flat rents <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
	Schedule of flat rents offered at each public housing development <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
	Section 8 rent determination (payment standard) policies <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation)	Annual Plan: Operations and Maintenance
	Public housing grievance procedures <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
	Section 8 informal review and hearing procedures <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant	Annual Plan: Capital Needs

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
	year	
X	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant	Annual Plan: Capital Needs
	Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment (provided at PHA option)	Annual Plan: Capital Needs
	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any other approved proposal for development of public housing	Annual Plan: Capital Needs
	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition
	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
	Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act	Annual Plan: Conversion of Public Housing
	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership
	Policies governing any Section 8 Homeownership program <input type="checkbox"/> check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency
	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	Annual Plan: Community Service & Self-Sufficiency
X	The most recent Public Housing Drug Elimination Program (PHEDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan)	Annual Plan: Safety and Crime Prevention
X	The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
	Troubled PHAs: MOA/Recovery Plan	Troubled PHAs
	Other supporting documents (optional) (list individually; use as many lines as necessary)	(specify as needed)

## **1. Statement of Housing Needs**

[24 CFR Part 903.7 9 (a)]

### **A. Housing Needs of Families in the Jurisdiction/s Served by the PHA**

Based upon the information contained in the Consolidated Plan/s applicable to the jurisdiction, and/or other data available to the PHA, provide a statement of the housing needs in the jurisdiction by completing the following table. In the “Overall” Needs column, provide the estimated number of renter families that have housing needs. For the remaining characteristics, rate the impact of that factor on the housing needs for each family type, from 1 to 5, with 1 being “no impact” and 5 being “severe impact.” Use N/A to indicate that no information is available upon which the PHA can make this assessment.

<b>Housing Needs of Families in the Jurisdiction by Family Type</b>							
Family Type	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Loca-tion
Income <= 30% of AMI	2078	5	5	2	N/A	3	3
Income >30% but <=50% of AMI	2161	5	5	2	N/A	3	3
Income >50% but <80% of AMI	2634	4	4	2	N/A	2	3
Elderly	2037	4	4	1	4	1	3
Families with Disabilities	788	5	5	2	5	3	3
White	5626	5	4	2	N/A	2	2
Black	573	5	4	2	N/A	2	2
Hispanic (all races)	993	5	4	2	N/A	2	2
Native American	30	5	4	2	N/A	2	2
Asian/Pacific Isl.	1279	5	4	2	N/A	2	2

What sources of information did the PHA use to conduct this analysis? (Check all that apply; all materials must be made available for public inspection.)

- Consolidated Plan of the Jurisdiction/s Alameda County Home Consortium  
Indicate year: FY1995-FY1999
- U.S. Census data: the Comprehensive Housing Affordability Strategy (“CHAS”) dataset
- American Housing Survey data  
Indicate year:
- Other housing market study  
Indicate year:
- Other sources: (list and indicate year of information)

**B. Housing Needs of Families on the Public Housing and Section 8  
Tenant- Based Assistance Waiting Lists**

State the housing needs of the families on the PHA's waiting list/s. **Complete one table for each type of PHA-wide waiting list administered by the PHA.** PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

<b>Housing Needs of Families on the Waiting List</b>			
Waiting list type: (select one)			
<input type="checkbox"/> Section 8 tenant-based assistance			
<input type="checkbox"/> Public Housing			
<input checked="" type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	5,623		Approx. 450
Extremely low income <=30% AMI	4,465	79	
Very low income (>30% but <=50% AMI)	941	17	
Low income (>50% but <80% AMI)	217	4	
Families with children	4,494	80	
Elderly families	437	8	
Families with Disabilities	1,011	22	
White	577	10.2	
Black	4,175	73.6	
Hispanic (all races)	198	3.5	
Native American	53	0.9	
Asian/Pac. Islander	645	11.4	
Other	25	0.4	
Characteristics by Bedroom Size (Public Housing Only)	The PHA maintains a combined list – not just public housing.		
1BR	26	0.5	
2 BR	1,685	29.7	
3 BR	3,014	53.1	
4 BR	796	14.0	
5 BR	133	2.3	

Housing Needs of Families on the Waiting List			
5+ BR	18	0.3	
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			
If yes:			
How long has it been closed (# of months)? 13			
Does the PHA expect to reopen the list in the PHA Plan year? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			

### C. Strategy for Addressing Needs

Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list **IN THE UPCOMING YEAR**, and the Agency's reasons for choosing this strategy.

#### (1) Strategies

**Need: Shortage of affordable housing for all eligible populations**

**Strategy 1. Maximize the number of affordable units available to the PHA within its current resources by:**

Select all that apply

- Employ effective maintenance and management policies to minimize the number of public housing units off-line
- Reduce turnover time for vacated public housing units
- Reduce time to renovate public housing units
- Seek replacement of public housing units lost to the inventory through mixed finance development
- Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources
- Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required
- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies
- Other (list below)

**Strategy 2: Increase the number of affordable housing units by:**

Select all that apply

- Apply for additional section 8 units should they become available
- Leverage affordable housing resources in the community through the creation of mixed - finance housing
- Pursue housing resources other than public housing or Section 8 tenant-based assistance.
- Other: (list below)

**Need: Specific Family Types: Families at or below 30% of median**

**Strategy 1: Target available assistance to families at or below 30 % of AMI**

Select all that apply

- Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing
- Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance
- Employ admissions preferences aimed at families with economic hardships
- Adopt rent policies to support and encourage work
- Other: (list below)  
Families on the waiting list at or below 30% of AMI are offered housing assistance first.

**Need: Specific Family Types: Families at or below 50% of median**

**Strategy 1: Target available assistance to families at or below 50% of AMI**

Select all that apply

- Employ admissions preferences aimed at families who are working
- Adopt rent policies to support and encourage work
- Other: (list below)

**Need: Specific Family Types: The Elderly**

**Strategy 1: Target available assistance to the elderly:**

Select all that apply

- Seek designation of public housing for the elderly
- Apply for special-purpose vouchers targeted to the elderly, should they become available
- Other: (list below)

**Need: Specific Family Types: Families with Disabilities**

**Strategy 1: Target available assistance to Families with Disabilities:**

Select all that apply

- Seek designation of public housing for families with disabilities
- Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing
- Apply for special-purpose vouchers targeted to families with disabilities, should they become available
- Affirmatively market to local non-profit agencies that assist families with disabilities
- Other: (list below)

**Need: Specific Family Types: Races or ethnicities with disproportionate housing needs**

**Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:**

Select if applicable

- Affirmatively market to races/ethnicities shown to have disproportionate housing needs
- Other: (list below)

**Strategy 2: Conduct activities to affirmatively further fair housing**

Select all that apply

- Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- Market the section 8 program to owners outside of areas of poverty /minority concentrations
- Other: (list below)

**Other Housing Needs & Strategies: (list needs and strategies below)**

**(2) Reasons for Selecting Strategies**

Of the factors listed below, select all that influenced the PHA's selection of the strategies it will pursue:

- Funding constraints
- Staffing constraints
- Limited availability of sites for assisted housing
- Extent to which particular housing needs are met by other organizations in the community

- Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- Influence of the housing market on PHA programs
- Community priorities regarding housing assistance
- Results of consultation with local or state government
- Results of consultation with residents and the Resident Advisory Board
- Results of consultation with advocacy groups
- Other: (list below)

## **2. Statement of Financial Resources**

[24 CFR Part 903.7 9 (b)]

List the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year. Note: the table assumes that Federal public housing or tenant based Section 8 assistance grant funds are expended on eligible purposes; therefore, uses of these funds need not be stated. For other funds, indicate the use for those funds as one of the following categories: public housing operations, public housing capital improvements, public housing safety/security, public housing supportive services, Section 8 tenant-based assistance, Section 8 supportive services or other.

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants (FY 2000 grants)</b>		
a) Public Housing Operating Fund	\$ 57,570	
b) Public Housing Capital Fund	260,000	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	11,077,486	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)	26,393	
g) Resident Opportunity and Self-Sufficiency Grants		
h) Community Development Block Grant		
i) HOME		
Other Federal Grants (list below)		
CIAP		
<b>2. Prior Year Federal Grants (unobligated funds only) (list below)</b>		
PHDEP	26,393	

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>3. Public Housing Dwelling Rental Income</b>	416,625	To operate complex and programs*
<b>4. Other income</b> (list below)		
Savings from bond refunding	15,400	* See above
Audit reimbursement	1,200	To pay for ind. audit
Miscellaneous	400	* See above
<b>4. Non-federal sources</b> (list below)		
<b>Total resources</b>	<b>\$11,881,467</b>	

### **3. PHA Policies Governing Eligibility, Selection, and Admissions**

[24 CFR Part 903.7 9 (c)]

#### **A. Public Housing**

Exemptions: PHAs that do not administer public housing are not required to complete subcomponent 3A.

##### **(1) Eligibility**

a. When does the PHA verify eligibility for admission to public housing? (select all that apply)

- When families are within a certain number of being offered a unit: (state number) 20
- When families are within a certain time of being offered a unit: (state time)
- Other: (describe)

b. Which non-income (screening) factors does the PHA use to establish eligibility for admission to public housing (select all that apply)?

- Criminal or Drug-related activity
- Rental history
- Housekeeping
- Other (describe) – Credit History

- c.  Yes  No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?
- d.  Yes  No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?
- e.  Yes  No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source)

**(2)Waiting List Organization**

a. Which methods does the PHA plan to use to organize its public housing waiting list (select all that apply)

- Community-wide list  
 Sub-jurisdictional lists  
 Site-based waiting lists  
 Other (describe)

b. Where may interested persons apply for admission to public housing?

- PHA main administrative office  
 PHA development site management office  
 Other (list below)

The Housing Authority's waiting list is currently closed. The location where applications were last distributed (when the waiting list was opened for one day on March 13, 1999) was a local school. Applications, however, were to be submitted to the Housing Authority's administrative office by April 2, 1999.

c. If the PHA plans to operate one or more site-based waiting lists in the coming year, answer each of the following questions; if not, skip to subsection **(3) Assignment**

1. How many site-based waiting lists will the PHA operate in the coming year?

2.  Yes  No: Are any or all of the PHA's site-based waiting lists new for the upcoming year (that is, they are not part of a previously-HUD-approved site based waiting list plan)?  
 If yes, how many lists?

3.  Yes  No: May families be on more than one list simultaneously  
 If yes, how many lists?

4. Where can interested persons obtain more information about and sign up to be on the site-based waiting lists (select all that apply)?

- PHA main administrative office  
 All PHA development management offices

- Management offices at developments with site-based waiting lists
- At the development to which they would like to apply
- Other (list below)

**(3) Assignment**

a. How many vacant unit choices are applicants ordinarily given before they fall to the bottom of or are removed from the waiting list? (select one)

- One
- Two
- Three or More

b.  Yes  No: Is this policy consistent across all waiting list types?

The Housing Authority maintains only one waiting list for public housing and Section 8 applicants.

c. If answer to b is no, list variations for any other than the primary public housing waiting list/s for the PHA:

**(4) Admissions Preferences**

a. Income targeting:

Yes  No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 40% of all new admissions to public housing to families at or below 30% of median area income?

b. Transfer policies:

In what circumstances will transfers take precedence over new admissions? (list below)

- Emergencies
- Overhoused
- Underhoused
- Medical justification
- Administrative reasons determined by the PHA (e.g., to permit modernization work)
- Resident choice: (state circumstances below)
- Other: (list below)

c. Preferences

1.  Yes  No: Has the PHA established preferences for admission to public housing (other than date and time of application)? (If “no” is selected, skip to subsection **(5) Occupancy**)

2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences:

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden (rent is > 50 percent of income)

Other preferences: (select below)

- Working families and those unable to work because of age or disability
- Veterans and veterans' families
- Residents who live and/or work in the jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs (if they graduated)
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

Special Provisions Preference -- Applicants with a Special Provision preference include:

- 1) Low-or very low-income Applicants who resided at the Harbor Island Apartments (formerly Bridgeport Apartments) prior to September 1987, referred to and accepted by the Owner, have first priority to obtain Housing Choice Vouchers for any new construction units funded by the Affordable Housing Fee (i.e. Infill New Construction Program), redevelopment or Proposition 84 funds<sup>1</sup>.
- 2) Managed housing program tenants required to move out of managed housing due to special circumstances and approved by the Executive Director.
- 3) Homeless single women when being considered for the Bessie Coleman SRO Section 8 Mod Rehab program only. Homeless are those who, without the intervention of a HUD-administered program, would (or imminently will) spend the night in a shelter or in a place not meant for human habitation.
- 4) Applicants requiring a handicapped-accessible unit.
- 5) Applicants for special programs, such as the Welfare-to-Work and Mainstream Voucher programs.

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<sup>1</sup> Refer to the excerpt from the settlement arising from the action entitled Clayton Guyton and Modessa Henderson v. City of Alameda, No. 646480-8 (appendix C) for further explanation on this preference.

3. If the PHA will employ admissions preferences, please prioritize by placing a “1” in the space that represents your first priority, a “2” in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use “1” more than once, “2” more than once, etc.

**2 Date and Time**

Former Federal preferences:

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans’ families
- Residents who live and/or work in the jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs (if they graduate)
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

- 1 The PHA employs the following admissions preferences first and then will apply date and time of application:

Points are not assigned for “Special Provisions” preferences. Applicants who qualify for special programs (e.g., Bessie Coleman SRO Section 8 Mod Rehab, Mainstream or Welfare-to-Work Vouchers) will be placed on lists specific to those programs in order of the date and time the application was received.

Other preferences have point values, which determine, in addition to the date and time of applications, the Applicant’s order of placement on the waiting lists. The Broad Range of Income Priority points are applied only after the 40 percent projected extremely low-income target for admissions in public housing has been met. The point values are:

<u>Points</u>	<u>Preference</u>
9	Residency
8	Broad Range of Income Priority 1
7	Broad Range of Income Priority 2
6	Broad Range of Income Priority 3

- 2 Members of the military or Veterans
- 1 Working Family

Points are cumulative. Applicants with the most points and earliest application are ranked higher on the waiting list. The date and time of application will be noted and utilized to determine the sequence within the above-prescribed preferences. Notwithstanding the above, families who are elderly or disabled will be offered housing before other single persons.

4. Relationship of preferences to income targeting requirements:

- The PHA applies preferences within income tiers
- Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

**(5) Occupancy**

a. What reference materials can applicants and residents use to obtain information about the rules of occupancy of public housing (select all that apply)

- The PHA-resident lease
- The PHA's Admissions and (Continued) Occupancy policy
- PHA briefing seminars or written materials
- Other source (list):
  - 1) Code of Federal Regulations located at local library, PHA office, Office of Esperanza Resident Management Council
  - 2) House Rules located on bulletin boards at complexes and given to residents with lease

b. How often must residents notify the PHA of changes in family composition? (select all that apply)

- At an annual reexamination and lease renewal
- Any time family composition changes
- At family request for revision
- Other (list)

**(6) Deconcentration and Income Mixing**

a.  Yes  No: Did the PHA's analysis of its family (general occupancy) developments to determine concentrations of poverty indicate the need for measures to promote deconcentration of poverty or income mixing?

b.  Yes  No: Did the PHA adopt any changes to its **admissions policies** based on the results of the required analysis of the need to promote deconcentration of poverty or to assure income mixing?

c. If the answer to b was yes, what changes were adopted? (select all that apply)

- Adoption of site-based waiting lists  
If selected, list targeted developments below:
- Employing waiting list “skipping” to achieve deconcentration of poverty or income mixing goals at targeted developments  
If selected, list targeted developments below:
- Employing new admission preferences at targeted developments  
If selected, list targeted developments below:
- Other (list policies and developments targeted below)

The Housing Authority reaffirmed the Broad Range of Incomes and Working Family preferences when adopting its Deconcentration Policy as part of the Admissions and Occupancy Policy.

d.  Yes  No: Did the PHA adopt any changes to **other** policies based on the results of the required analysis of the need for deconcentration of poverty and income mixing?

e. If the answer to d was yes, how would you describe these changes? (select all that apply)

- Additional affirmative marketing
- Actions to improve the marketability of certain developments
- Adoption or adjustment of ceiling rents for certain developments
- Adoption of rent incentives to encourage deconcentration of poverty and income-mixing
- Other (list below)

f. Based on the results of the required analysis, in which developments will the PHA make special efforts to attract or retain higher-income families? (select all that apply)

- Not applicable: results of analysis did not indicate a need for such efforts
- List (any applicable) developments below:

Esperanza is the Housing Authority’s only public housing complex.

g. Based on the results of the required analysis, in which developments will the PHA make special efforts to assure access for lower-income families? (select all that apply)

- Not applicable: results of analysis did not indicate a need for such efforts
- List (any applicable) developments below:

Esperanza is the Housing Authority’s only public housing complex.

## B. Section 8

Exemptions: PHAs that do not administer section 8 are not required to complete sub-component 3B.

**Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

### (1) Eligibility

a. What is the extent of screening conducted by the PHA? (select all that apply)

- Criminal or drug-related activity only to the extent required by law or regulation  
 Criminal and drug-related activity, more extensively than required by law or regulation  
 More general screening than criminal and drug-related activity (list factors below)  
 Other (list below)

b.  Yes  No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?

c.  Yes  No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?

d.  Yes  No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source)

e. Indicate what kinds of information you share with prospective landlords? (select all that apply)

- Criminal or drug-related activity (see below)  
 Other (describe below)

Upon receipt of a Request for Lease Approval by the Housing Authority, Owners may request, and the Authority will provide, specific information about the family being considered for tenancy. The Authority will provide the following information:

- The family's current address as provided by the Applicant; and
- The name and address, if known, of the Owner/Landlord of the family's current and prior places of residence.

The Housing Authority will only respond to specific questions asked by Owners and only when the Authority has documentation to confirm the accuracy of the information being provided. Information may be released if contained in the following types of documents:

- 1) Notices of lease violation or termination
- 2) Unit inspections
- 3) Owner claims for unpaid tenant rent and damages
- 4) Records of illegal drug activities as reported in newspapers or other public records

5) Tenant rent accounts (for tenants of Housing Authority-managed housing units)

**(2) Waiting List Organization**

a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged? (select all that apply)

- None
- Federal public housing
- Federal moderate rehabilitation
- Federal project-based certificate program
- Other federal or local program (list below)

In addition to public housing and Section 8 tenant-based assistance, the Housing Authority owns and manages several complexes. The types of applicants vary. Only applicants for units with HOME rents and for Independence Plaza, a senior housing facility, a non-HUD supported complex, are not on a common waiting list.

b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply)

- PHA main administrative office
- Other (list below)

The Housing Authority's waiting list is closed. When the Housing Authority recently opened its waiting list, for one day only (March 13, 1999), applications were distributed at a local school. Submission, however, was at the Authority's administrative office by April 2, 1999.

**(3) Search Time**

a.  Yes  No: Does the PHA give extensions on standard 60-day period to search for a unit?

If yes, state circumstances below:

Housing Choice Vouchers are issued for an initial term of 60 days. A person with a disability may request an initial term of 120 days to have an equal opportunity to seek housing. Such request will be approved upon verification of need.

If a Housing Choice Voucher expires or is about to expire, and the Voucher holder has been unable to locate a suitable housing unit, the Voucher holder may submit a request for an extension. The Housing Authority will review the situation with the Voucher holder, including the efforts made to find a suitable housing unit, and will determine if an extension of the term should enable the Voucher holder to locate a suitable unit. As documentation of efforts to find a suitable housing unit, the Voucher holder must submit to the Housing Authority a list of contacts with prospective lessors and the results of the contacts. If the Housing Authority determines that there is a reasonable possibility that

additional assistance should enable the Voucher holder to locate a suitable unit, the Authority may grant one or more extensions, not to exceed a maximum of 60 additional days. Extensions are generally granted in 30-day increments.

If a member of the family is disabled and the family requests an extension beyond 120 days because of this disability, the Housing Authority will verify that there is reasonable documentation of the nature and effect of the disability on the family's search for acceptable housing and if it appears reasonable, the Authority will grant a request to extend the term of the Voucher holder, as a reasonable accommodation.

Expiration of a Housing Choice Voucher will not preclude the holder from filing a new application for another Housing Choice Voucher if the Authority is accepting applications and the Applicant continues to be eligible.

#### **(4) Admissions Preferences**

a. Income targeting

Yes  No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 75% of all new admissions to the section 8 program to families at or below 30% of median area income?

b. Preferences

1.  Yes  No: Has the PHA established preferences for admission to section 8 tenant-based assistance? (other than date and time of application) (if no, skip to subcomponent **(5) Special purpose section 8 assistance programs**)

2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden (rent is > 50 percent of income)

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans' families
- Residents who live and/or work in your jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)

- Those previously enrolled in educational, training, or upward mobility programs (If they graduate.)
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

Special Provisions Preference -- Applicants with a Special Provision preference include:

- 1) Low-or very low-income Applicants who resided at the Harbor Island Apartments (formerly Bridgeport Apartments) prior to September 1987, referred to and accepted by the Owner, have first priority to obtain Housing Choice Vouchers for any new construction units funded by the Affordable Housing Fee (i.e. Infill New Construction Program), redevelopment or Proposition 84 funds<sup>2</sup>.
- 2) Managed housing program tenants required to move out of managed housing due to special circumstances and approved by the Executive Director.
- 3) Homeless single women when being considered for the Bessie Coleman SRO Section 8 Mod Rehab program only. Homeless are those who, without the intervention of a HUD-administered program, would (or imminently will) spend the night in a shelter or in a place not meant for human habitation.
- 4) Applicants requiring a handicapped-accessible unit.
- 5) Applicants for special programs, such as the Welfare-to-Work and Mainstream Voucher programs.

3. If the PHA will employ admissions preferences, please prioritize by placing a “1” in the space that represents your first priority, a “2” in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use “1” more than once, “2” more than once, etc.

## 2 Date and Time

### Former Federal preferences

Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)

Victims of domestic violence

Substandard housing

Homelessness

High rent burden

Other preferences (select all that apply) – See below for ranking.

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<sup>2</sup> Refer to the excerpt from the settlement arising from the action entitled Clayton Guyton and Modessa Henderson v. City of Alameda, No. 646480-8 (appendix C) for further explanation on this preference.

- Working families and those unable to work because of age or disability
- Veterans and veterans' families
- Residents who live and/or work in your jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

1 The PHA will apply the following preferences first prior to applying date and time of application:

Points are not assigned for "Special Provisions" preferences. Applicants who qualify for special programs (e.g., Bessie Coleman SRO Section 8 Mod Rehab, Mainstream or Welfare-to-Work Vouchers) will be placed on lists specific to those programs in order of the date and time the application was received.

Other preferences have point values, which determine, in addition to the date and time of applications, the Applicant's order of placement on the waiting lists. The Broad Range of Income Priority points are applied only after the 40 percent projected extremely low-income target for admissions in public housing has been met. The point values are:

<u>Points</u>	<u>Preference</u>
9	Residency
8	Broad Range of Income Priority 1
7	Broad Range of Income Priority 2
6	Broad Range of Income Priority 3
2	Members of the military or Veterans
1	Working Family

Points are cumulative. Applicants with the most points and earliest application are ranked higher on the waiting list.

The date and time of application will be noted and utilized to determine the sequence within the above-prescribed preferences. Notwithstanding the above, families who are elderly or disabled will be offered housing before other single persons.

4. Among applicants on the waiting list with equal preference status, how are applicants selected? (select one)

- Date and time of application
- Drawing (lottery) or other random choice technique

5. If the PHA plans to employ preferences for “residents who live and/or work in the jurisdiction” (select one)

- This preference has previously been reviewed and approved by HUD  
 The PHA requests approval for this preference through this PHA Plan

6. Relationship of preferences to income targeting requirements: (select one)

- The PHA applies preferences within income tiers  
 Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

### **(5) Special Purpose Section 8 Assistance Programs**

a. In which documents or other reference materials are the policies governing eligibility, selection, and admissions to any special-purpose section 8 program administered by the PHA contained? (select all that apply)

- The Section 8 Administrative Plan  
 Briefing sessions and written materials  
 Other (list below)

b. How does the PHA announce the availability of any special-purpose Section 8 programs to the public?

- Through published notices  
 Other (list below)

The Housing Authority intends to survey families on the waiting list and to select 500 families for a special list specific for the special-purpose Section 8 programs (i.e., Welfare-to-Work Vouchers). The Housing Authority also will contact agencies and community-based organizations that work with eligible families in the case of the Mainstream program.

## **4. PHA Rent Determination Policies**

[24 CFR Part 903.7 9 (d)]

### **A. Public Housing**

Exemptions: PHAs that do not administer public housing are not required to complete sub-component 4A.

#### **(1) Income Based Rent Policies**

Describe the PHA’s income based rent setting policy/ies for public housing using, including discretionary (that is, not required by statute or regulation) income disregards and exclusions, in the appropriate spaces below.

a. Use of discretionary policies: (select one)

- The PHA will not employ any discretionary rent-setting policies for income based rent in public housing. Income-based rents are set at the higher of 30% of adjusted monthly income, 10% of unadjusted monthly income, the welfare rent, or minimum rent (less HUD mandatory deductions and exclusions). (If selected, skip to sub-component (2))

---or---

- The PHA employs discretionary policies for determining income-based rent (If selected, continue to question b.)

b. Minimum Rent

1. What amount best reflects the PHA's minimum rent? (select one)

- \$0  
 \$1-\$25  
 \$26-\$50

2.  Yes  No: Has the PHA adopted any discretionary minimum rent hardship exemption policies?

The Housing Authority has adopted only the non-discretionary hardship exemptions.

3. If yes to question 2, list these policies below:

c. Rents set at less than 30% than adjusted income

1.  Yes  No: Does the PHA plan to charge rents at a fixed amount or percentage less than 30% of adjusted income?

2. If yes to above, list the amounts or percentages charged and the circumstances under which these will be used below:

The Housing Authority has established the following fixed rents as options to the standard 30% of adjusted income rent, which is unchanged:

One Bedroom	\$450
Two Bedroom	\$600
Three Bedroom	\$700
Four Bedroom	\$800
Five Bedroom	\$850

- d. Which of the discretionary (optional) deductions and/or exclusions policies does the PHA plan to employ (select all that apply)

- For the earned income of a previously unemployed household member
- For increases in earned income
- Fixed amount (other than general rent-setting policy)  
If yes, state amount/s and circumstances below:
- Fixed percentage (other than general rent-setting policy)  
If yes, state percentage/s and circumstances below:
- For household heads
- For other family members
- For transportation expenses
- For the non-reimbursed medical expenses of non-disabled or non-elderly families
- Other (describe below)

e. Ceiling rents

1. Do you have ceiling rents? (rents set at a level lower than 30% of adjusted income) (select one)

- Yes for all developments
- Yes but only for some developments
- No

2. For which kinds of developments are ceiling rents in place? (select all that apply)

- For all developments
- For all general occupancy developments (not elderly or disabled or elderly only)
- For specified general occupancy developments
- For certain parts of developments; e.g., the high-rise portion
- For certain size units; e.g., larger bedroom sizes
- Other (list below)

3. Select the space or spaces that best describe how you arrive at ceiling rents (select all that apply)

- Market comparability study
- Fair market rents (FMR)
- 95<sup>th</sup> percentile rents
- 75 percent of operating costs
- 100 percent of operating costs for general occupancy (family) developments
- Operating costs plus debt service
- The “rental value” of the unit
- Other (list below)

f. Rent re-determinations:

1. Between income reexaminations, how often must tenants report changes in income or family composition to the PHA such that the changes result in an adjustment to rent? (select all that apply)

- Never
- At family option
- Any time the family experiences an income increase
- Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold)\_\_\_\_\_
- Other (list below)

Tenants must report changes in income or family composition within 10 days of the occurrence. If the change results in an upward adjustment to the rent, the Housing Authority does not raise the rent amount until the next regularly scheduled re-examination.

g.  Yes  No: Does the PHA plan to implement individual savings accounts for residents (ISAs) as an alternative to the required 12 month disallowance of earned income and phasing in of rent increases in the next year?

**(2) Flat Rents**

1. In setting the market-based flat rents, what sources of information did the PHA use to establish comparability? (select all that apply.)

- The section 8 rent reasonableness study of comparable housing
- Survey of rents listed in local newspaper
- Survey of similar unassisted units in the neighborhood
- Other (list/describe below)

**B. Section 8 Tenant-Based Assistance**

Exemptions: PHAs that do not administer Section 8 tenant-based assistance are not required to complete sub-component 4B. **Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

**(1) Payment Standards**

Describe the voucher payment standards and policies .

a. What is the PHA's payment standard? (select the category that best describes your standard)

- At or above 90% but below 100% of FMR
- 100% of FMR
- Above 100% but at or below 110% of FMR

Above 110% of FMR (if HUD approved; describe circumstances below)

b. If the payment standard is lower than FMR, why has the PHA selected this standard? (select all that apply)

- FMRs are adequate to ensure success among assisted families in the PHA's segment of the FMR area
- The PHA has chosen to serve additional families by lowering the payment standard
- Reflects market or submarket
- Other (list below)

c. If the payment standard is higher than FMR, why has the PHA chosen this level? (select all that apply)

- FMRs are not adequate to ensure success among assisted families in the PHA's segment of the FMR area
- Reflects market or submarket
- To increase housing options for families
- Other (list below)

d. How often are payment standards reevaluated for adequacy? (select one)

- Annually
- Other (list below)

Recently with the rapidly changing local housing market, the Housing Authority has been conducting this re-evaluation at six-month intervals.

e. What factors will the PHA consider in its assessment of the adequacy of its payment standard? (select all that apply)

- Success rates of assisted families
- Rent burdens of assisted families
- Other (list below)

## **(2) Minimum Rent**

a. What amount best reflects the PHA's minimum rent? (select one)

- \$0
- \$1-\$25
- \$26-\$50

[Note: The Housing Authority has established a \$25 minimum rent for Section 8 New Construction only – Parrot Village and Eagle Village complexes. The above applies to tenant-based Section 8 only.]

b.  Yes  No: Has the PHA adopted any discretionary minimum rent hardship exemption policies? (if yes, list below)

The Housing Authority has adopted only non-discretionary hardship exemptions.

**5. Operations and Management**

[24 CFR Part 903.7 9 (e)]

Exemptions from Component 5: High performing and small PHAs are not required to complete this section. Section 8 only PHAs must complete parts A, B, and C(2)

**A. PHA Management Structure**

Describe the PHA’s management structure and organization.

(select one)

- An organization chart showing the PHA’s management structure and organization is attached.
- A brief description of the management structure and organization of the PHA follows:

**B. HUD Programs Under PHA Management**

List Federal programs administered by the PHA, number of families served at the beginning of the upcoming fiscal year, and expected turnover in each. (Use “NA” to indicate that the PHA does not operate any of the programs listed below.)

<b>Program Name</b>	<b>Units or Families Served at Year Beginning</b>	<b>Expected Turnover</b>
Public Housing		
Section 8 Vouchers		
Section 8 Certificates		
Section 8 Mod Rehab		
Special Purpose Section 8 Certificates/Vouchers (list individually)		
Public Housing Drug Elimination Program (PHDEP)		
Other Federal Programs(list individually)		

**C. Management and Maintenance Policies**

List the PHA’s public housing management and maintenance policy documents, manuals and handbooks that contain the Agency’s rules, standards, and policies that govern maintenance and management of public

housing, including a description of any measures necessary for the prevention or eradication of pest infestation (which includes cockroach infestation) and the policies governing Section 8 management.

(1) Public Housing Maintenance and Management: (list below)

(2) Section 8 Management: (list below)

## **6. PHA Grievance Procedures**

[24 CFR Part 903.7 9 (f)]

Exemptions from component 6: High performing PHAs are not required to complete component 6. Section 8-Only PHAs are exempt from sub-component 6A.

### **A. Public Housing**

1.  Yes  No: Has the PHA established any written grievance procedures in addition to federal requirements found at 24 CFR Part 966, Subpart B, for residents of public housing?

If yes, list additions to federal requirements below:

2. Which PHA office should residents or applicants to public housing contact to initiate the PHA grievance process? (select all that apply)

- PHA main administrative office
- PHA development management offices
- Other (list below)

### **B. Section 8 Tenant-Based Assistance**

1.  Yes  No: Has the PHA established informal review procedures for applicants to the Section 8 tenant-based assistance program and informal hearing procedures for families assisted by the Section 8 tenant-based assistance program in addition to federal requirements found at 24 CFR 982?

If yes, list additions to federal requirements below:

2. Which PHA office should applicants or assisted families contact to initiate the informal review and informal hearing processes? (select all that apply)

- PHA main administrative office
- Other (list below)

## **7. Capital Improvement Needs**

[24 CFR Part 903.7 9 (g)]

Exemptions from Component 7: Section 8 only PHAs are not required to complete this component and may skip to Component 8.

**A. Capital Fund Activities**

Exemptions from sub-component 7A: PHAs that will not participate in the Capital Fund Program may skip to component 7B. All other PHAs must complete 7A as instructed.

**(1) Capital Fund Program Annual Statement**

Using parts I, II, and III of the Annual Statement for the Capital Fund Program (CFP), identify capital activities the PHA is proposing for the upcoming year to ensure long-term physical and social viability of its public housing developments. This statement can be completed by using the CFP Annual Statement tables provided in the table library at the end of the PHA Plan template **OR**, at the PHA’s option, by completing and attaching a properly updated HUD-52837.

Select one:

The Capital Fund Program Annual Statement is provided as an attachment to the PHA Plan at Attachment (state name) **Attachment B**

-or-

The Capital Fund Program Annual Statement is provided below: (if selected, copy the CFP Annual Statement from the Table Library and insert here)

**(2) Optional 5-Year Action Plan**

Agencies are encouraged to include a 5-Year Action Plan covering capital work items. This statement can be completed by using the 5 Year Action Plan table provided in the table library at the end of the PHA Plan template **OR** by completing and attaching a properly updated HUD-52834.

a.  Yes  No: Is the PHA providing an optional 5-Year Action Plan for the Capital Fund? (if no, skip to sub-component 7B)

b. If yes to question a, select one:

The Capital Fund Program 5-Year Action Plan is provided as an attachment to the PHA Plan at Attachment (state name) **Attachment C**

-or-

The Capital Fund Program 5-Year Action Plan is provided below: (if selected, copy the CFP optional 5 Year Action Plan from the Table Library and insert here)

**B. HOPE VI and Public Housing Development and Replacement Activities (Non-Capital Fund)**

Applicability of sub-component 7B: All PHAs administering public housing. Identify any approved HOPE VI and/or public housing development or replacement activities not described in the Capital Fund Program Annual Statement.

Yes  No: a) Has the PHA received a HOPE VI revitalization grant? (if no, skip to question c; if yes, provide responses to question b for each grant, copying and completing as many times as necessary)

b) Status of HOPE VI revitalization grant (complete one set of questions for each grant)

1. Development name:
2. Development (project) number:
3. Status of grant: (select the statement that best describes the current status)
  - Revitalization Plan under development
  - Revitalization Plan submitted, pending approval
  - Revitalization Plan approved
  - Activities pursuant to an approved Revitalization Plan underway

Yes  No: c) Does the PHA plan to apply for a HOPE VI Revitalization grant in the Plan year?  
If yes, list development name/s below:

Yes  No: d) Will the PHA be engaging in any mixed-finance development activities for public housing in the Plan year?  
If yes, list developments or activities below:

Yes  No: e) Will the PHA be conducting any other public housing development or replacement activities not discussed in the Capital Fund Program Annual Statement?  
If yes, list developments or activities below:

## **8. Demolition and Disposition**

[24 CFR Part 903.7 9 (h)]

Applicability of component 8: Section 8 only PHAs are not required to complete this section.

1.  Yes  No: Does the PHA plan to conduct any demolition or disposition activities (pursuant to section 18 of the U.S. Housing Act of 1937 (42 U.S.C. 1437p)) in the plan Fiscal Year? (If “No”, skip to component 9; if “yes”, complete one activity description for each development.)

2. Activity Description

Yes  No: Has the PHA provided the activities description information in the **optional** Public Housing Asset Management Table? (If “yes”, skip to component 9. If “No”, complete the Activity Description table below.)

<b>Demolition/Disposition Activity Description</b>
1a. Development name:
1b. Development (project) number:
2. Activity type: Demolition <input type="checkbox"/>

Disposition <input type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date application approved, submitted, or planned for submission: <u>(DD/MM/YY)</u>
5. Number of units affected: 6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: b. Projected end date of activity:

**9. Designation of Public Housing for Occupancy by Elderly Families or Families with Disabilities or Elderly Families and Families with Disabilities**

[24 CFR Part 903.7 9 (i)]

Exemptions from Component 9; Section 8 only PHAs are not required to complete this section.

1.  Yes  No: Has the PHA designated or applied for approval to designate or does the PHA plan to apply to designate any public housing for occupancy only by the elderly families or only by families with disabilities, or by elderly families and families with disabilities or will apply for designation for occupancy by only elderly families or only families with disabilities, or by elderly families and families with disabilities as provided by section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) in the upcoming fiscal year? (If “No”, skip to component 10. If “yes”, complete one activity description for each development, unless the PHA is eligible to complete a streamlined submission; PHAs completing streamlined submissions may skip to component 10.)

2. Activity Description

Yes  No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? If “yes”, skip to component 10. If “No”, complete the Activity Description table below.

<b>Designation of Public Housing Activity Description</b>
1a. Development name:
1b. Development (project) number:
2. Designation type:

Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation approved, submitted, or planned for submission: <u>(DD/MM/YY)</u>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input type="checkbox"/> Total development

## **10. Conversion of Public Housing to Tenant-Based Assistance**

[24 CFR Part 903.7 9 (j)]

Exemptions from Component 10; Section 8 only PHAs are not required to complete this section.

### **A. Assessments of Reasonable Revitalization Pursuant to section 202 of the HUD FY 1996 HUD Appropriations Act**

1.  Yes  No: Have any of the PHA's developments or portions of developments been identified by HUD or the PHA as covered under section 202 of the HUD FY 1996 HUD Appropriations Act? (If "No", skip to component 11; if "yes", complete one activity description for each identified development, unless eligible to complete a streamlined submission. PHAs completing streamlined submissions may skip to component 11.)

#### 2. Activity Description

- Yes  No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? If "yes", skip to component 11. If "No", complete the Activity Description table below.

<b>Conversion of Public Housing Activity Description</b>
1a. Development name:
1b. Development (project) number:
2. What is the status of the required assessment? <input type="checkbox"/> Assessment underway

<input type="checkbox"/> Assessment results submitted to HUD <input type="checkbox"/> Assessment results approved by HUD (if marked, proceed to next question) <input type="checkbox"/> Other (explain below)
3. <input type="checkbox"/> Yes <input type="checkbox"/> No: Is a Conversion Plan required? (If yes, go to block 4; if no, go to block 5.)
4. Status of Conversion Plan (select the statement that best describes the current status) <input type="checkbox"/> Conversion Plan in development <input type="checkbox"/> Conversion Plan submitted to HUD on: (DD/MM/YYYY) <input type="checkbox"/> Conversion Plan approved by HUD on: (DD/MM/YYYY) <input type="checkbox"/> Activities pursuant to HUD-approved Conversion Plan underway
5. Description of how requirements of Section 202 are being satisfied by means other than conversion (select one) <input type="checkbox"/> Units addressed in a pending or approved demolition application (date submitted or approved: _____) <input type="checkbox"/> Units addressed in a pending or approved HOPE VI demolition application (date submitted or approved: _____) <input type="checkbox"/> Units addressed in a pending or approved HOPE VI Revitalization Plan (date submitted or approved: _____) <input type="checkbox"/> Requirements no longer applicable: vacancy rates are less than 10 percent <input type="checkbox"/> Requirements no longer applicable: site now has less than 300 units <input type="checkbox"/> Other: (describe below)

**B. Reserved for Conversions pursuant to Section 22 of the U.S. Housing Act of 1937**

**C. Reserved for Conversions pursuant to Section 33 of the U.S. Housing Act of 1937**

**11. Homeownership Programs Administered by the PHA**

[24 CFR Part 903.7 9 (k)]

**A. Public Housing**

Exemptions from Component 11A: Section 8 only PHAs are not required to complete 11A.

1.  Yes  No: Does the PHA administer any homeownership programs administered by the PHA under an approved section 5(h) homeownership program (42 U.S.C. 1437c(h)), or an approved HOPE I program (42 U.S.C. 1437aaa) or has the PHA applied or plan to apply to administer any homeownership programs under section 5(h), the HOPE I program, or section 32 of the U.S. Housing Act of 1937 (42 U.S.C. 1437z-4). (If “No”, skip to component 11B; if “yes”, complete one activity

description for each applicable program/plan, unless eligible to complete a streamlined submission due to **small PHA** or **high performing PHA** status. PHAs completing streamlined submissions may skip to component 11B.)

2. Activity Description

Yes  No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? (If “yes”, skip to component 12. If “No”, complete the Activity Description table below.)

<b>Public Housing Homeownership Activity Description (Complete one for each development affected)</b>
1a. Development name: 1b. Development (project) number:
2. Federal Program authority: <input type="checkbox"/> HOPE I <input type="checkbox"/> 5(h) <input type="checkbox"/> Turnkey III <input type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/1/99)
3. Application status: (select one) <input type="checkbox"/> Approved; included in the PHA’s Homeownership Plan/Program <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date Homeownership Plan/Program approved, submitted, or planned for submission: (DD/MM/YYYY)
5. Number of units affected: 6. Coverage of action: (select one) <input type="checkbox"/> Part of the development <input type="checkbox"/> Total development

**B. Section 8 Tenant Based Assistance**

1.  Yes  No: Does the PHA plan to administer a Section 8 Homeownership program pursuant to Section 8(y) of the U.S.H.A. of 1937, as implemented by 24 CFR part 982 ? (If “No”, skip to component 12; if “yes”, describe each program using the table below (copy and complete questions for each program identified), unless the PHA is eligible to complete a streamlined submission due to high performer status. **High performing PHAs** may skip to component 12.)

2. Program Description:

a. Size of Program

Yes  No: Will the PHA limit the number of families participating in the section 8 homeownership option?

If the answer to the question above was yes, which statement best describes the number of participants? (select one)

- 25 or fewer participants
- 26 - 50 participants
- 51 to 100 participants
- more than 100 participants

b. PHA-established eligibility criteria

Yes  No: Will the PHA's program have eligibility criteria for participation in its Section 8 Homeownership Option program in addition to HUD criteria?  
If yes, list criteria below:

## **12. PHA Community Service and Self-sufficiency Programs**

[24 CFR Part 903.7 9 (l)]

Exemptions from Component 12: High performing and small PHAs are not required to complete this component. Section 8-Only PHAs are not required to complete sub-component C.

### **A. PHA Coordination with the Welfare (TANF) Agency**

1. Cooperative agreements:

Yes  No: Has the PHA has entered into a cooperative agreement with the TANF Agency, to share information and/or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937)?

If yes, what was the date that agreement was signed? DD/MM/YY

2. Other coordination efforts between the PHA and TANF agency (select all that apply)

- Client referrals
- Information sharing regarding mutual clients (for rent determinations and otherwise)
- Coordinate the provision of specific social and self-sufficiency services and programs to eligible families
- Jointly administer programs
- Partner to administer a HUD Welfare-to-Work voucher program
- Joint administration of other demonstration program
- Other (describe)

### **B. Services and programs offered to residents and participants**

**(1) General**

a. Self-Sufficiency Policies

Which, if any of the following discretionary policies will the PHA employ to enhance the economic and social self-sufficiency of assisted families in the following areas? (select all that apply)

- Public housing rent determination policies
- Public housing admissions policies
- Section 8 admissions policies
- Preference in admission to section 8 for certain public housing families
- Preferences for families working or engaging in training or education programs for non-housing programs operated or coordinated by the PHA
- Preference/eligibility for public housing homeownership option participation
- Preference/eligibility for section 8 homeownership option participation
- Other policies (list below)

b. Economic and Social self-sufficiency programs

Yes  No: Does the PHA coordinate, promote or provide any programs to enhance the economic and social self-sufficiency of residents? (If “yes”, complete the following table; if “no” skip to sub-component 2, Family Self Sufficiency Programs. The position of the table may be altered to facilitate its use. )

<b>Services and Programs</b>				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)

**(2) Family Self Sufficiency program/s**

a. Participation Description

Family Self Sufficiency (FSS) Participation		
Program	Required Number of Participants (start of FY 2000 Estimate)	Actual Number of Participants (As of: DD/MM/YY)
Public Housing		
Section 8		

- b.  Yes  No: If the PHA is not maintaining the minimum program size required by HUD, does the most recent FSS Action Plan address the steps the PHA plans to take to achieve at least the minimum program size?  
If no, list steps the PHA will take below:

**C. Welfare Benefit Reductions**

1. The PHA is complying with the statutory requirements of section 12(d) of the U.S. Housing Act of 1937 (relating to the treatment of income changes resulting from welfare program requirements) by: (select all that apply)

- Adopting appropriate changes to the PHA’s public housing rent determination policies and train staff to carry out those policies
- Informing residents of new policy on admission and reexamination
- Actively notifying residents of new policy at times in addition to admission and reexamination.
- Establishing or pursuing a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services
- Establishing a protocol for exchange of information with all appropriate TANF agencies
- Other: (list below)

**D. Reserved for Community Service Requirement pursuant to section 12(c) of the U.S. Housing Act of 1937**

**13. PHA Safety and Crime Prevention Measures**

[24 CFR Part 903.7 9 (m)]

Exemptions from Component 13: High performing and small PHAs not participating in PHDEP and Section 8 Only PHAs may skip to component 15. High Performing and small PHAs that are participating in PHDEP and are submitting a PHDEP Plan with this PHA Plan may skip to sub-component D.

**A. Need for measures to ensure the safety of public housing residents**

1. Describe the need for measures to ensure the safety of public housing residents (select all that apply)

- High incidence of violent and/or drug-related crime in some or all of the PHA's developments
- High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the PHA's developments
- Residents fearful for their safety and/or the safety of their children
- Observed lower-level crime, vandalism and/or graffiti
- People on waiting list unwilling to move into one or more developments due to perceived and/or actual levels of violent and/or drug-related crime
- Other (describe below)

2. What information or data did the PHA used to determine the need for PHA actions to improve safety of residents (select all that apply).

- Safety and security survey of residents
- Analysis of crime statistics over time for crimes committed “in and around” public housing authority
- Analysis of cost trends over time for repair of vandalism and removal of graffiti
- Resident reports
- PHA employee reports
- Police reports
- Demonstrable, quantifiable success with previous or ongoing anticrime/anti drug programs
- Other (describe below)

3. Which developments are most affected? (list below)

**B. Crime and Drug Prevention activities the PHA has undertaken or plans to undertake in the next PHA fiscal year**

1. List the crime prevention activities the PHA has undertaken or plans to undertake: (select all that apply)

- Contracting with outside and/or resident organizations for the provision of crime- and/or drug-prevention activities
- Crime Prevention Through Environmental Design
- Activities targeted to at-risk youth, adults, or seniors
- Volunteer Resident Patrol/Block Watchers Program
- Other (describe below)

2. Which developments are most affected? (list below)

**C. Coordination between PHA and the police**

1. Describe the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities: (select all that apply)

- Police involvement in development, implementation, and/or ongoing evaluation of drug-elimination plan
- Police provide crime data to housing authority staff for analysis and action
- Police have established a physical presence on housing authority property (e.g., community policing office, officer in residence)
- Police regularly testify in and otherwise support eviction cases
- Police regularly meet with the PHA management and residents
- Agreement between PHA and local law enforcement agency for provision of above-baseline law enforcement services
- Other activities (list below)

2. Which developments are most affected? (list below)

**D. Additional information as required by PHDEP/PHDEP Plan**

PHAs eligible for FY 2000 PHDEP funds must provide a PHDEP Plan meeting specified requirements prior to receipt of PHDEP funds.

- Yes  No: Is the PHA eligible to participate in the PHDEP in the fiscal year covered by this PHA Plan?
- Yes  No: Has the PHA included the PHDEP Plan for FY 2000 in this PHA Plan?
- Yes  No: This PHDEP Plan is an Attachment. (Attachment D)

**14. RESERVED FOR PET POLICY**

[24 CFR Part 903.7 9 (n)]

According to the Final Rule on Public Housing Agency Plans, “The regulations governing pets in housing for the elderly or persons with disabilities are not required to be covered by the PHA Annual Plan.” The Housing Authority of the City of Alameda will establish policies and procedures in compliance with the Public Housing Reform Act pertaining to ownership of pets in public housing after publication of the Final Rule by HUD on this issue and the Authority has had sufficient time to deal effectively with the new requirements.

**15. Civil Rights Certifications**

[24 CFR Part 903.7 9 (o)]

Civil rights certifications are included in the PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations.

**16. Fiscal Audit**

[24 CFR Part 903.7 9 (p)]

1.  Yes  No: Is the PHA required to have an audit conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h))?  
(If no, skip to component 17.)
2.  Yes  No: Was the most recent fiscal audit submitted to HUD?
3.  Yes  No: Were there any findings as the result of that audit?
4.  Yes  No: If there were any findings, do any remain unresolved?  
If yes, how many unresolved findings remain? None
5.  Yes  No: Have responses to any unresolved findings been submitted to HUD?  
If not, when are they due (state below)?

## **17. PHA Asset Management**

[24 CFR Part 903.7 9 (q)]

Exemptions from component 17: Section 8 Only PHAs are not required to complete this component. High performing and small PHAs are not required to complete this component.

1.  Yes  No: Is the PHA engaging in any activities that will contribute to the long-term asset management of its public housing stock, including how the Agency will plan for long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs that have **not** been addressed elsewhere in this PHA Plan?
2. What types of asset management activities will the PHA undertake? (select all that apply)
  - Not applicable
  - Private management
  - Development-based accounting
  - Comprehensive stock assessment
  - Other: (list below)
3.  Yes  No: Has the PHA included descriptions of asset management activities in the **optional** Public Housing Asset Management Table?

## **18. Other Information**

[24 CFR Part 903.7 9 (r)]

### **A. Resident Advisory Board Recommendations**

1.  Yes  No: Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?
2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)
  - Attached as Attachment E

Provided below:

3. In what manner did the PHA address those comments? (select all that apply)

Considered comments, but determined that no changes to the PHA Plan were necessary.

The PHA changed portions of the PHA Plan in response to comments  
List changes below:

- 1) A suggestion was made to change Goal 1 to address the need to retain all current housing programs. The goal was revised to include the underlined words: Maintain and expand quality, safe and affordable housing throughout the city of Alameda.
- 2) A suggestion was made related to the Five-Year Plan to specify interim goals for each where applicable. The Housing Authority specified interim objectives where applicable, specifically on Goal 1, Objective b, where the five-year objective is to lease up 200 families. An interim objective was added to average 40 per year.
- 3) A clarification was requested of the term “welfare rent” in the Rent Determination policies as outlined in the ACOP and Administrative Plan. The Housing Authority agreed to remove reference to this term as it is not relevant in this jurisdiction.
- 4) A suggestion was made to revise the Subsidy Standards that state that a tenant may not use the living room as a bedroom. The Housing Authority agreed to reword this section of the ACOP to clarify its intent. The new wording will read: The Housing Authority will not consider the living room as a bedroom in assigning subsidy standards.
- 5) A suggestion was made to add a definition of “substantial deviation or significant amendments or modifications.” The Housing Authority discovered the requirement to include this definition after the Agency Plans were made available for the 45-day comment period. The Housing Authority agrees to include the definition that appears section 18.D below.
- 6) A suggestion was made to extend the deadline to lease a unit beyond 120 days to all voucher holders. The Housing Authority agreed to offer extensions beyond 120 days to disabled family upon request and upon documentation of the nature and effect of the disability on the family’s search for acceptable housing, as a reasonable accommodation.
- 7) A suggestion was made to clarify the wording in the Deconcentration Policy on how the Esperanza public housing complex will be designated. The Housing Authority will revise the section entitled “Deconcentration Efforts” to

do that. In addition, a typographical error, the inclusion of the word “not” where it should not be, was noticed. The Housing Authority has removed it. For the actual wording see Attachment A.

- 8) The Housing Authority was advised that those comments that resulted in changes to the Five-Year or Annual Plans should be listed in this section. The Housing Authority is doing so.

Other: (list below)

## **B. Description of Election process for Residents on the PHA Board**

1.  Yes  No: Does the PHA meet the exemption criteria provided section 2(b)(2) of the U.S. Housing Act of 1937? (If no, continue to question 2; if yes, skip to sub-component C.)
2.  Yes  No: Was the resident who serves on the PHA Board elected by the residents? (If yes, continue to question 3; if no, skip to sub-component C.)

### 3. Description of Resident Election Process

#### a. Nomination of candidates for place on the ballot: (select all that apply)

- Candidates were nominated by resident and assisted family organizations
- Candidates could be nominated by any adult recipient of PHA assistance
- Self-nomination: Candidates registered with the PHA and requested a place on ballot
- Other: (describe)

#### b. Eligible candidates: (select one)

- Any recipient of PHA assistance
- Any head of household receiving PHA assistance
- Any adult recipient of PHA assistance
- Any adult member of a resident or assisted family organization
- Other (list)

#### c. Eligible voters: (select all that apply)

- All adult recipients of PHA assistance (public housing and section 8 tenant-based assistance)
- Representatives of all PHA resident and assisted family organizations
- Other (list)

## **C. Statement of Consistency with the Consolidated Plan**

For each applicable Consolidated Plan, make the following statement (copy questions as many times as necessary).

1. Consolidated Plan jurisdiction: (Alameda County Home Consortium)
2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)

- The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)

The Housing Authority has set the goal to "Maintain and expand quality, safe and affordable housing throughout the city of Alameda." To achieve this goal, the Housing Authority has established the following objectives:

1. Maintain the existing 572 rental housing units and maintain housing currently available under the Section 8 program.
2. Lease up 40 additional families in the Section 8 program.
3. Work toward moving 20 families into homeownership by 2005.
4. Work toward developing 50 additional managed housing units by 2005.
5. Work toward adding 50 additional landlords to the Section 8 program by 2003.

The Housing Authority has established the following Guiding Principles as well:

- 1) Our services, policies and staff considerations shall reflect the agency's value for inclusiveness, diversity and culturally sensitive services.
- 2) Our agency goals will be achieved by ongoing collaboration with customers and community partners.

Other: (list below)

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

The Housing Authority's goals, guiding principles and objectives are consistent with the initiatives contained in the Consolidated Plan, which state:

1. Increase the availability of affordable rental housing for low- and moderate-income households.
2. Preserve existing affordable rental and ownership housing for low- and moderate-income households.

3. Assist low- and moderate-income first-time homebuyers.
4. Reduce housing discrimination.
5. Enhance accessibility for individuals with physical disabilities.

#### **D. Other Information Required by HUD**

Use this section to provide any additional information requested by HUD.

##### **Definition of “Substantial Deviation”**

Substantial deviations or significant amendments or modifications are defined as discretionary changes in the plans of the Housing Authority of the City of Alameda that fundamentally change the mission, goals, or policies contained in the Five-Year Plan or Annual Plan of the agency and which require formal approval of the Housing Commission.

Attachment A  
HOUSING AUTHORITY OF THE CITY OF ALAMEDA (CA062)  
DECONCENTRATION POLICY AND TARGETING

The policy and process for managing and promoting the deconcentration of poverty in the Esperanza (public housing) complex is founded on the premise there are distinct social and agency benefits to be derived from promoting and maintaining affordable housing developments which are occupied by families that have a range of incomes and that are not concentrated by very-low income families. This premise is recognized not only as an agency policy and goal, but also as a requirement of law.

Deconcentration and income mixing for Esperanza results in the formation of a more stable and cohesive resident community. Working families become positive role models for other families in the community who still rely on public assistance. The increased rental revenue also reduces the Housing Authority's dependence on the federal government.

#### Income Targeting

Esperanza (public housing): At least 40 percent of families admitted to public housing by the Housing Authority must have incomes that do not exceed 30 percent of the area's median income. The Housing Authority may admit less than 40 percent of the families with incomes below 30 percent of the median income (extremely low income families) in a fiscal year to the extent that they have provided more than 75 percent of newly available vouchers to very poor families. This provision is called "fungibility."

The Housing Authority is limited to using the fungibility credits under the following circumstances:

- 1) The number of units equivalent to 10 percent of the number of newly available vouchers in that fiscal year;
- 2) The number of units that are (i) are in projects located in census tracts having a poverty rate of 30 percent or more, and (ii) are made available for occupancy by and actually occupied in that year by very poor families;
- 3) The number of units that cause the Housing Authority's overall requirement for housing very poor families to drop to 30 percent of its newly available units.

Eagle Village and Parrot Village (Section 8 New Construction): There is no "fungibility" option for families receiving assistance under this program. The Housing Authority is required to target not less than 40 percent of units which become available each year must be leased to families with income that does not exceed 30 percent of the area's median income at the time they commence their lease.

#### Deconcentration Efforts

The Housing Authority will achieve deconcentration of poverty and income-mixing at Esperanza by bringing higher income families into the complex. Each year the Housing Authority will conduct an analysis of tenant income and income mix data within the complex to determine the percentage of households that are very low income compared with those

HOUSING AUTHORITY OF THE CITY OF ALAMEDA  
DECONCENTRATION POLICY

with incomes above the very low standard. If the analysis shows a majority of household incomes are above the very low income standard, the complex will be designated a “higher income complex.” It will be designated a “lower income complex” if the majority of households have incomes at or below the very low standard.

Implementation of the Housing Authority’s deconcentration efforts will not impose or require any specific income or racial quota for this complex.

New Admissions

As stated in the preferences section of this policy, the Housing Authority will continue to implement the “broad range of income” policy to avoid concentrations of the most economically and socially deprived families and to house families with a broad range of income, and with the rent paying ability to achieve financial stability.

The Housing Authority also gives a preference in admissions, to households with one member who is working, a graduate of, or an active participant in an educational or training program designed to prepare individuals for the job market (working family preference).

**Incentives for Working Families**

- a. The Quality Housing and Work Responsibility Act of 1998 requires that housing authorities establish a flat rent for public housing units (Esperanza) based on the rental value of the unit. This option will be made available to tenants after September 30, 1999. The Housing Authority will conduct a rental survey of unassisted units in the area to assist in determining the market value of the public housing units.
- b. The Housing Authority will also consider the per unit operating cost in establishing flat rents. Flat rents are designed to encourage and reward employment and self-sufficiency. Residents who find jobs resulting in higher –income tenants will not see their rents above this flat rent. This provides an incentive for higher-income tenants to remain in public housing. Another incentive provided by a flat rent is tenants will only be required to go through a full recertification once every three years.
- c. The incentives referred to in the above section will be made available by the Housing Authority in a manner that allows for each eligible family to have the sole discretion in determining whether to accept the incentive. The Housing Authority will not take any adverse action toward any family member that chooses not to accept an incentive or occupancy of an offered unit. The skipping of a family on the waiting list to reach another family in order to implement the policy under this section shall not be considered an shall not be considered an adverse action and shall not be contestable.
- d. In order of the Housing Authority to maintain its “Three Housing Offer and Cancellation “ rule for applicant families, the Housing Authority will only offer the above incentives to an eligible family on the first housing offer which shall be

HOUSING AUTHORITY OF THE CITY OF ALAMEDA  
DECONCENTRATION POLICY

considered an offer outside the Three Housing Offer rule. If the family rejects the incentives and complex offered, the family will remain eligible for three additional offers, without incentive. Each of these offers will count under the Three Offer Rule.

**Attachment B**  
**HOUSING AUTHORITY OF THE CITY OF ALAMEDA (CA062)**  
**Component 7**  
**Capital Fund Program Annual Statement**  
**Parts I, II, and III**

**Annual Statement**  
**Capital Fund Program (CFP) Part I: Summary**

Capital Fund Grant Number Unknown FFY of Grant Approval: (MM/YYYY)

Original Annual Statement THIS ASSUMES A GRANT IN FY2001 COMPARABLE TO FY2000 CIAP GRANT

Line No.	Summary by Development Account	Total Estimated Cost
1	Total Non-CGP Funds	
2	1406 Operations	
3	1408 Management Improvements	\$ 9,000
4	1410 Administration	45,000
5	1411 Audit	
6	1415 Liquidated Damages	
7	1430 Fees and Costs	6,000
8	1440 Site Acquisition	
9	1450 Site Improvement	
10	1460 Dwelling Structures	180,000
11	1465.1 Dwelling Equipment-Nonexpendable	
12	1470 Nondwelling Structures	
13	1475 Nondwelling Equipment	
14	1485 Demolition	
15	1490 Replacement Reserve	
16	1492 Moving to Work Demonstration	
17	1495.1 Relocation Costs	5,000
18	1498 Mod Used for Development	
19	1502 Contingency	15,000
20	<b>Amount of Annual Grant (Sum of lines 2-19)</b>	<b>\$260,000</b>
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	



HOUSING AUTHORITY OF THE CITY OF ALAMEDA  
 CAPITAL FUND PROGRAM

	<b>Tenant Relocation</b> Relocate five to seven families during renovation of their units.	<b>1495.1</b>	\$5,000
	<b>Contingency</b>	<b>1502</b>	\$15,000
	<b>TOTAL (estimated based on prior year)</b>		<b>\$260,000</b>

**Annual Statement**  
**Capital Fund Program (CFP) Part III: Implementation Schedule**

Development Number/Name HA-Wide Activities	All Funds Obligated (Quarter Ending Date)	All Funds Expended (Quarter Ending Date)
CA062/Esperanza	September 30, 2001	September 30, 2001

## Attachment C

### HOUSING AUTHORITY OF THE CITY OF ALAMEDA

### Table for 5-Year Action Plan for Capital Fund (Component 7)

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

<b>Optional 5-Year Action Plan Tables</b>				
<b>Development Number</b>	<b>Development Name (or indicate PHA wide)</b>	<b>Number Vacant Units</b>	<b>% Vacancies in Development</b>	
CA062	Esperanza	6 *	5%	
<b>Description of Needed Physical Improvements or Management Improvements</b>			<b>Estimated Cost</b>	<b>Planned Start Date (HA Fiscal Year)</b>
<p>There are 120 units at Esperanza. All units have received new windows, doors and furnaces. Full renovation has been completed on 26 units (4 of the five bedroom units, 6 of the four bedroom units, and 16 of the three bedroom units). Six more units (1 five bedroom, 1 four bedroom, 3 three bedroom, and 1 two bedroom) are currently being renovated. The remaining 89 units need to be renovated, which includes:</p> <ul style="list-style-type: none"> <li>- Replacing handrails and hardware (adding returns per City bldg. Code)</li> <li>- Removing flooring throughout unit, abating asbestos, replacing with durable new flooring material and replacing base molding.</li> <li>- Removing tubs, shower units and surrounds, abating asbestos, repairing water damaged sub-floor, and replacing all with durable products.</li> <li>- Replacing water heaters (and pressure-relief valves) with safer, energy-efficient models.</li> <li>- Repairing damaged wall surfaces and painting with two coats of latex over primer throughout.</li> <li>- Replacing damaged kitchen and bathroom cabinets and counters and sinks with durable new products.</li> <li>- Installing durable horizontal blinds on all windows.</li> </ul> <p>In addition, the north side fencing along the Atlantic Avenue beltway and storage sheds need to be replaced; and the parking lots need to be resurfaced. The total cost for all remaining units and these projects exceeds what can be accomplished with Capital Fund income over the next five years. Approximately one-third of the units can be done.</p> <p>Year one – renovate up to seven units, replace approx. ½ of sheds, repave ½ lots</p> <p>Year two – renovate up to seven units, replace remaining sheds, repave other lots</p> <p>Year three – renovate five to seven units</p> <p>Year four – renovate five to seven units</p> <p>Year five – renovate five to seven units</p>			<p>\$260,000</p> <p>260,000</p> <p>260,000</p> <p>260,000</p> <p>260,000</p>	<p>November 1, 2001</p> <p>November 1, 2002</p> <p>November 1, 2003</p> <p>November 1, 2004</p> <p>November 1, 2005</p>
<b>Total estimated cost over next 5 years</b>			<b>\$1,310,000</b>	

\* Five of the six vacant units are currently being renovated.

**Attachment D**  
**HOUSING AUTHORITY OF THE CITY OF ALAMEDA (CA062)**  
**Public Housing Drug Elimination Program Plan**

**Note: THIS PHDEP Plan template (HUD 50075-PHDEP Plan) is to be completed in accordance with Instructions located in applicable PIH Notices.**

**Annual PHDEP Plan Table of Contents:**

1. **General Information/History**
2. **PHDEP Plan Goals/Budget**
3. **Milestones**
4. **Certifications**

**Section 1: General Information/History**

**A. Amount of PHDEP Grant \$26,393**

**B. Eligibility type (Indicate with an "x")**      N1 \_\_\_\_\_ N2 \_\_\_\_\_      R   X  

**C. FFY in which funding is requested**   2000  

**D. Executive Summary of Annual PHDEP Plan**

In the space below, provide a brief overview of the PHDEP Plan, including highlights of major initiatives or activities undertaken. It may include a description of the expected outcomes. The summary must not be more than five (5) sentences long

The Crime Prevention Partnership Program of the Housing Authority of the City of Alameda consists of a comprehensive, three-pronged strategy to attack drug use and related crime at the Esperanza public housing complex. The strategy consists of aggressive community policing; after-school and summer youth activities with an emphasis on academic performance and drug resistance; and fostering economic independence for residents, specifically through the Esperanza Computer Resource Center. This year's PHDEP funding will support youth activities and the Computer Resource Center; community policing will continue to be funded from Housing Authority funds.

**E. Target Areas**

Complete the following table by indicating each PHDEP Target Area (development or site where activities will be conducted), the total number of units in each PHDEP Target Area, and the total number of individuals expected to participate in PHDEP sponsored activities in each Target Area.

<b>PHDEP Target Areas (Name of development(s) or site)</b>	<b>Total # of Units within the PHDEP Target Area(s)</b>	<b>Total Population to be Served within the PHDEP Target Area(s)</b>
Esperanza	120	445

**F. Duration of Program**

Indicate the duration (number of months funds will be required) of the PHDEP Program proposed under this Plan (place an “x” to indicate the length of program by # of months. For “Other”, identify the # of months).

6 Months \_\_\_\_\_ 12 Months  X  18 Months \_\_\_\_\_ 24 Months \_\_\_\_\_ Other \_\_\_\_\_

**G. PHDEP Program History**

Indicate each FY that funding has been received under the PHDEP Program (place an “x” by each applicable Year) and provide amount of funding received. If previously funded programs have not been closed out at the time of this submission, indicate the fund balance and anticipated completion date. For grant extensions received, place “GE” in column or “W” for waivers.

Fiscal Year of Funding	PHDEP Funding Received	Grant #	Fund Balance as of Date of this Submission	Grant Extensions or Waivers	Anticipated Completion Date
FY 1995					
FY 1996					
X FY 1997	\$50,000	CA39DEP0620197	\$0.00		N/A
X FY 1998	\$50,000	CA39DEP0620198	\$15,000		6/30/2000
X FY 1999	\$26,393	CA39DEP0620199	\$26,393		6/30/2001

**Section 2: PHDEP Plan Goals and Budget**

**A. PHDEP Plan Summary**

In the space below, summarize the PHDEP strategy to address the needs of the target population/target area(s). Your summary should briefly identify: the broad goals and objectives, the role of plan partners, and your system or process for monitoring and evaluating PHDEP-funded activities. This summary should not exceed 5-10 sentences.

The Crime Prevention Partnership Program addresses the needs of the population of Esperanza to live in a safe community with a low crime rate and minimal drug activity through an aggressive community policing program, after-school recreational activities for youth, and a computer resource center that is available to all residents. PHDEP funded activities include the youth recreational program and the Computer Resource Center. The youth program provides after-school and summer recreational activities, with an emphasis on self-esteem, drug education information, development of leadership skills, as well as offering recreational and educational opportunities to participants. The Computer Resource Center serves both adults and youth with a variety of educational games and software, basic word processing and spread sheet programs and Internet access.

The Housing Authority works in partnership with the Alameda Police Department and with community-based organizations to provide these services. Oversight and evaluation of these programs occur through regular meetings of Housing Authority staff with direct service providers; reports to the Housing Commission; input from residents via the annual Town Hall Meeting and the Esperanza Resident Management Council; and surveys of Esperanza residents.

## B. PHDEP Budget Summary

Enter the total amount of PHDEP funding allocated to each line item.

<b>FY 2000 PHDEP Budget Summary</b>	
<b>Budget Line Item</b>	<b>Total Funding</b>
9110 - Reimbursement of Law Enforcement	
9120 - Security Personnel	
9130 - Employment of Investigators	
9140 - Voluntary Tenant Patrol	
9150 - Physical Improvements	
9160 - Drug Prevention	\$26,393
9170 - Drug Intervention	
9180 - Drug Treatment	
9190 - Other Program Costs	
<b>TOTAL PHDEP FUNDING</b>	<b>\$26,393</b>

## C. PHDEP Plan Goals and Activities

In the tables below, provide information on the PHDEP strategy summarized above by budget line item. Each goal and objective should be numbered sequentially for each budget line item (where applicable). Use as many rows as necessary to list proposed activities (additional rows may be inserted in the tables). PHAs are not required to provide information in shaded boxes. Information provided must be concise—not to exceed two sentences in any column. Tables for line items in which the PHA has no planned goals or activities may be deleted.

<b>9160 - Drug Prevention</b>					<b>Total PHDEP Funding: \$26,393</b>		
Goal #1	Keep crime rate at current low level.						
Objective #1	Provide positive recreational programming for youth.						
Objective #2	Offer technology resources for youth and adults through the Esperanza Computer Resource Center.						
Proposed Activities	# of Persons Served	Target Population	Start Date	Expected Complete Date	PHEDEP Funding	Other Funding (Amount /Source)	Performance Indicators
1. Esperanza Youth Services	130	Youth 8 – 18	7/1995	On going	\$14,393	\$25,607 (PHA funds)	Increase youth participation.
2. Esperanza Computer Center	60	All residents	6/1998	On going	\$12,000	\$0	Goal will be achieved
3.							

**Section 3: Expenditure/Obligation Milestones**

Indicate by Budget Line Item and the Proposed Activity (based on the information contained in Section 2 PHDEP Plan Budget and Goals), the % of funds that will be expended (at least 25% of the total grant award) and obligated (at least 50% of the total grant award) within 12 months of grant execution.

<b>Budget Line Item #</b>	<b>25% Expenditure of Total Grant Funds By Activity #</b>	<b>Total PHDEP Funding Expended (sum of the activities)</b>	<b>50% Obligation of Total Grant Funds by Activity #</b>	<b>Total PHDEP Funding Obligated (sum of the activities)</b>
<i>e.g Budget Line Item # 9120</i>	<i>Activities 1, 3</i>		<i>Activity 2</i>	
9110				
9120				
9130				
9140				
9150				
9160	Activities 1,2: 25%	\$6,598.25	Activities 1,2: 50%	\$13,196.50
9170				
9180				
9190				
<b>TOTAL</b>		\$6,598.25		\$13,196.50

**Section 4: Certifications**

A comprehensive certification of compliance with respect to the PHDEP Plan submission is included in the “PHA Certifications of Compliance with the PHA Plan and Related Regulations.”

## Attachment E

### RESIDENT ADVISORY COMMITTEE COMMENTS AND HOUSING AUTHORITY OF THE CITY OF ALAMEDA RESPONSES

Comments from first four Committee Meetings:

#### Five Year Plan

##### **Section A:**

1. In the Mission Statement, what is meant by “entire community?”  
**Response:** Staff explained the statement intends to communicate that the Housing Authority will work with all segments of the community to meet the Housing Authority’s mission.

##### **Section B:**

1. The Housing Authority should develop a promotional program to encourage partnership with landlords.  
**Response:** This is included in Goal 1, Objective b.
2. The Housing Authority should advertise to encourage/promote housing and HA tenants.  
**Response:** Included in Goal 1, Objective f.
3. The Housing Authority should promote newspaper articles about tenants.  
**Response:** This will be addressed in the implementation of Goal 1f.
4. In Goal 1, first objective should address the need to retain all current housing programs.  
**Response:** This was added to the Five Year Plan as Goal 1, Objective 1.
5. For five year goals, HA should specify interim goals for each year where applicable.  
**Response:** This suggestion was incorporated in Goal 1b. Additional milestones will be identified as the Agency Plan is implemented.
6. HA should develop incentive programs for employees to get them to want to do a better job.  
**Response:** The Housing Authority already has some incentives in place.
7. Notices to tenants should be in other languages. The office should have more interpreters in more languages. Floor monitors at Independence Plaza need to have updated emergency procedures in language of residents. The Housing Authority should use agencies such as FACSA for translation. Newsletter should go out in different languages.  
**Response:** The Housing Authority currently has designated employees who speak Spanish, Chinese, Vietnamese, and Tagalog. Staff will consider the feasibility of providing additional assistance to non-English speaking customers when implementing Goal 3b.

HOUSING AUTHORITY OF THE CITY OF ALAMEDA (CA 062)  
RESIDENT ADVISORY COMMITTEE RESPONSES AND AUTHORITY RESPONSES

8. A new objective should be incorporated under Goal 3 stating the Housing Authority will work with resident organizations to get tenant input as the Authority is planning programs.  
**Response:** This is addressed in Guiding Principle B.
9. Keep Independence Plaza (and other) tenants informed about upcoming activities.  
**Response:** This is addressed in Goal 3d.
10. There is a problem with litter at various complexes. The Housing Authority should develop an "honor system" and/or an incentive system for tenants who keep things clean. There should be trash baskets in every court so children can throw away their trash.  
**Response:** The Housing Authority sponsors an annual spring clean-up and newsletters are used to remind tenants of their responsibilities to maintain their complexes in a clean and neat manner. These additional suggestions will be considered in implementing Goal 4d.
11. The Housing Authority should respond more to needs of non-English speaking residents. It was suggested that the Housing Authority recruit bilingual residents to act as "mentors" or "big brothers/sisters" to non-English speaking tenants to tell them about meetings, translate notices, etc.  
**Response:** See #6 above.

**Agency Plan**

**Section 3**

1. Should families that receive managed housing from the waiting list be kept on the list for Section 8 assistance?  
**Response:** Yes, they remain on the Section 8 waiting list, and conversely, families that receive Section 8 assistance may remain on the list for managed housing if they wish.
2. Why does the Housing Authority give a preference to veterans?  
**Response:** It is state law.
3. People on the waiting list should be notified of their status, perhaps every 90 days.  
**Response:** It would be extremely expensive to do so with over 5000 people on the waiting list. Also, due to preferences, an applicant's status may frequently change.
4. Perhaps a tenant could be trained to give information about positions on the waiting list over the phone as part of their community service.  
**Response:** Because of the confidentiality of this information, this suggestion is not considered feasible.

**Section 4**

1. RAC asked for a clarification of "welfare rent" in the Rent Determination policies as outlined in the ACOP and Administrative Plan.  
**Response:** Staff agreed that this term should be removed, as it is not relevant.
2. One RAC member asked about "ceiling rents," and said that the Housing Authority should have these.  
**Response:** HA is not required to have ceiling rents and has chosen not to do so. In any

HOUSING AUTHORITY OF THE CITY OF ALAMEDA (CA 062)  
RESIDENT ADVISORY COMMITTEE RESPONSES AND AUTHORITY RESPONSES

rate, ceiling rents are being phased out now that new fixed rents are available to public housing tenants under QHWRA.

**Section 11**

1. Do only Section 8 Family Self-Sufficiency tenants have opportunities for home ownership?  
**Response:** No, all Housing Authority managed housing tenants and Section 8 participants are given priority in home ownership opportunities.
2. Housing Authority needs to help tenants move to home ownership in the community, not just Housing Authority-developed projects.  
**Response:** The Housing Authority has sponsored workshops to inform customers about home ownership opportunities for first-time home buyers and will continue to do so.

**Section 13**

1. Police officers should attend the after-school youth program at Esperanza at least once every two weeks.  
**Response:** This issue relates to funding under PHDEP. HA police officers already participate in the after-school youth project. Housing Authority staff will explore the feasibility of increasing that participation.

Comments From Public Hearing and Responses

The Housing Authority of the City of Alameda held a public hearing on the Five-Year and Annual Plan ("Agency Plans") on March 15, 2000, at 7:30 p.m. at Independence Plaza, Ruth Rambeau Memorial Community Room, 703 Atlantic Avenue, Alameda, California. About 10 persons attended the hearing. Verbal comments were received from seven individuals. In addition to verbal comments, Community Legal Aid Society provided written comments to the Housing Commission at the public hearing. No other written comments have been received.

Verbal Comments

1. **Comment from Resident Advisory Committee (RAC) member and member of Esperanza Resident Management Council (ERMC):** This RAC member requested clarification on flat rents for Esperanza.

**Response:** Housing Authority staff has met with the ERMC on this issue to explain flat rents in detail. Information has been included in newsletters to Esperanza residents and will be explained individually to each residents at their reexamination.

2. **Comment from Esperanza public housing resident:** The resident was concerned about the condition of her unit and the fact that all the other five-bedroom units had been renovated except for hers.

**Response:** The Housing Authority agrees to respond separately to this resident.

3. **Comment from Resident Advisory Committee (RAC) member and member of Esperanza Resident Management Council (ERMC):** This resident expressed concerns about the Housing Authority's policy that does not allow for separate bedrooms for children of the opposite sex.

HOUSING AUTHORITY OF THE CITY OF ALAMEDA (CA 062)  
RESIDENT ADVISORY COMMITTEE RESPONSES AND AUTHORITY RESPONSES

**Response:** The Housing Authority's occupancy and subsidy standards are based on the number of people in a family. The Authority believes this is an equitable and fair method of assigning a unit or voucher.

**4. Comment from Community Legal Aid Society of Alameda County:** This comment was a summary of what was stated in the written comments submitted at the meeting. Please refer to the written comments below.

**Response:** Refer to the Housing Authority's responses to the written comments below.

**5. Comment from Resident Advisory Committee (RAC) member and member of Esperanza Resident Management Council (ERMC):** This resident stated that her primary concern was that Esperanza residents be given economic opportunities. She also stated that some Esperanza residents would like to purchase their units. She expressed her concern that Esperanza residents were not give the opportunity to purchase homeownership units.

**Response:** The Housing Authority's programs for encouraging economic self-sufficiency are not part of the Agency Plans. The Housing Authority has responded to this comment separately.

The Housing Authority does not have a homeownership policy specific to public housing (i.e., Esperanza) residents.

**6. Comment from Resident Advisory Committee (RAC) member and Section 8 Participant:** This resident expressed his opinion that the RAC meetings were fair and above-board. He said that he did not feel rushed at the meetings. He expressed concern about Harbor Island Apartments no longer accepting Section 8 participants and that East Housing (on the former Alameda Naval Air Station) was not being made available as affordable rental units. He also asked if it is possible for the Housing Authority to enter into contracts with landlords to retain Section 8 residents. He expressed his opinion that the poor are discriminated against.

**Response:** The Housing Authority has a landlord outreach program to retain and add landlords to the Section 8 program. The Housing Authority has no authority to decide what will happen with East Housing.

**7. Comment from Resident Advisory Committee (RAC) member and Independence Plaza resident:** This resident stated that the first three RAC meetings were closed to the public but the fourth meeting was open.

**Response:** While the first three meetings were not noticed public meetings, subsequent meetings were noticed and there was opportunity for public input.

**8. Comment from Resident Advisory Committee (RAC) member and Rosefield Village resident:** This resident said that he was given the opportunity and the time to discuss anything at every RAC meeting. He mentioned that there was discussion on encouraging owners to participate in Section 8. He discussed the difficulties in obtaining greater landlord participation. He thanked the Housing Commission for giving him the opportunity to serve on the RAC.

**Response:** The Housing Commission thanked this member and all members for serving on the Resident Advisory Committee.

Written Comments

**1. Comment on Page 2, Paragraph 1:** The RAC was not given the opportunity to actually assist in the development of the Plan, nor was it given sufficient time or resources to fully make comprehensive recommendations on the Plan.

**Response:** The Housing Authority believes it is important to note that CLAS represents three members of the RAC in their individual citizen capacities, not the RAC as a whole. Other members of the RAC did not share the opinion expressed by CLAS.

The Housing Authority believes RAC members, including those represented by CLAS who are also members of the Esperanza Resident Management Council (ERMC), had ample opportunity to assist in the development of the plan.

The Housing Authority believes RAC members were given sufficient time and resources to fully make comprehensive recommendations on the plan. The final regulations governing the Agency Plans were not issued October 21, 1999. The deadlines for making the final draft available for public review and to submit the plans to HUD (April 15, 2000) were established by HUD. The time frame, therefore, was a finite item and one over which the Housing Authority had no control.

**2. Comment on Page 2, Paragraph 2** At the RAC meetings, the Housing Authority staff presented the draft Plan according to a pre-set agenda that the RAC was rushed to get through in the allotted two hours; RAC members were discouraged from asking questions and were not given the opportunity to break into discussion groups. A tremendous amount of material was covered in a relatively short period of time; consequently there were many issues that did not get discussed. Because of the expedited schedule, and because the meetings took place around the holidays, the RAC did not have adequate time to consult with other residents.

**Response:** The Housing Authority disagrees that RAC members were “rushed to get through in the allotted two hours.” Members were provided the materials for the meeting in advance and had ample time, therefore, to prepare questions and comments.

The Housing Authority believes RAC members were encouraged to participate by asking questions, providing comments, etc. Members of the RAC not represented by CLAS have stated that they were not rushed or discouraged from asking questions. No RAC members suggested “breaking into discussion groups.”

At each meeting, the RAC agreed to the date and time for the next meeting.

**3. Comment on Page 2, Paragraph 3:** The RAC was not given the necessary resources to obtain any training or technical assistance in order to fully understand the Housing Authority’s programs in order to make recommendations on the Plan. [T]he Housing Authority discouraged assistance to the RAC by prohibiting CLAS from attending the RAC meetings, in violation of the Brown Act.

**Response:** The Housing Authority disagrees with the CLAS claim that the RAC had insufficient resources for training or technical assistance “to fully understand the Housing Authority’s programs in order to make recommendations on the Plan.” The only members of the RAC asking for financial resources were members of the ERMC. The ERMC has

HOUSING AUTHORITY OF THE CITY OF ALAMEDA (CA 062)  
RESIDENT ADVISORY COMMITTEE RESPONSES AND AUTHORITY RESPONSES

grant funding available for such training, has the volunteer assistance of an attorney and the assistance of CLAS.

The Housing Authority has donated a copy machine to the ERMC, provided reimbursement for childcare to an ERMC member to attend the RAC meetings, provides the ERMC with office space, and met with ERMC members to discuss a few issues in more depth, including flat rents and homeownership opportunities. The Housing Authority believes the ERMC members represented by CLAS had the resources to understand fully the agency plans.

The Housing Authority was in error in not making the first three RAC meetings public. Once the Housing Authority was aware of the error, it was corrected. The fourth meeting was public and appropriately noticed to that effect. All Town Hall meetings held prior to the RAC meetings were public meetings, noticed appropriately.

**4. Comment on Page 3, top of the page:** CLAS states that the Housing Authority “must define a significant amendment or modification’ in detail in its Plan... The Housing Authority must also meet with the RAC after the public hearing to discuss the public’s comments and any changes that were made to the Plan.

**Response:** The Housing Authority learned about this requirement after the Agency Plans were made available to the public for the 45-day comment period. The Housing Authority will add the following definition to the Annual Plan:

Definition of “Substantial Deviation”

Substantial deviations or significant amendments or modifications are defined as discretionary changes in the plans of the Housing Authority of the City of Alameda that fundamentally change the mission, goals, or policies contained in the Annual Plan of the agency and which require formal approval of the Housing Commission.

Federal regulations (24 CFR § 903.13 (c)) states that the Housing Authority “must consider the recommendations of the Resident Advisory Board or Boards in preparing the final Annual Plan, and any significant amendment or modification to the Annual Plan...” The Housing Authority is complying with the provision. Public’s comments that do not affect the Five-Year Plan or Annual Plan do not have to go to the RAC for discussion.

**5. Comment on Page 3, First Paragraph:** CLAS states that the Housing Authority “should disclose the process by which the RAC was appointed in order to ensure that the individuals ‘adequately reflect and represent the residents assisted by the PHA’. The Housing Authority should explain how it notified and selected Section 8 participants to be on the RAC and what other efforts it made to obtain representation reflective of the residents it serves.”

**Response:** All clients were given the opportunity to apply to the RAC. The Esperanza Resident Management Council (ERMC) selected the representatives for the Authority’s only public housing complex. The Housing Commission appointed members to the RAC representative of all the complexes and Section 8 participants.

**6. Comment on Page 3, Five-Year Plan, Mission:** CLAS states the opinion that several terms in the Housing Authority’s mission statement should be defined. CLAS also says the Authority should state how “it will strengthen [community inclusiveness and diversity].

HOUSING AUTHORITY OF THE CITY OF ALAMEDA (CA 062)  
RESIDENT ADVISORY COMMITTEE RESPONSES AND AUTHORITY RESPONSES

**Response:** Including definitions as part of a mission statement is unnecessary. The Housing Authority believes that this mission will be achieved through the objectives outlined in the plan.

**7. Comment on Page 3, Five-Year Plan, Goals:** CLAS states that the Housing Authority “should actively develop job opportunities and access funds for employment programs in order to employ public housing and Section 8 residents where possible.”

**Response:** The Housing Authority has stated its goals for the next five years. The means to achieve these goals are broadly outlined in the objectives. Specific procedures are not appropriate to this planning document.

**8. Comment on Page 4, Five-Year Plan, Goals, Paragraph 1:** CLAS states “To promote self-sufficiency and self-reliance, the Housing Authority should also permit and encourage public housing residents to have garage sales, bake sales, work on cars, provide child care services, catering services, and have other home businesses.... [P]ublic housing residents should have input on how money for tenant activities is spent. The residents may want to spend that money on activities for adults, as well as for youth. The Housing Authority should also solicit input from the residents regarding how the maintenance charges are determined.... [R]esidents should not be charged to repair or replace items that are old or defective.”

**Response:** Esperanza residents have provided input on how money for tenant activities is spent. Several years ago, the Housing Authority conducted a survey of residents and found out that their highest priority was youth activities. This is when the Housing Authority started the Esperanza Youth Project. Another priority of residents was a computer center. The Esperanza Computer Resource Center is the result. This Center is available to adults as well as youth.

Esperanza residents also are invited annually to a Town Hall meeting. This forum provides the opportunity for residents to provide input on any topic, including how money for tenant activities is spent.

Maintenance charges are based on the actual cost of performing the maintenance tasks (i.e., parts and labor). Housing Authority staff met with the ERMCA on these charges prior to their adoption. The Housing Commission adopted the current maintenance charges at a public meeting, which was noticed publicly, including at the Esperanza public housing complex. Residents had the opportunity to submit comments either verbally or in writing to be considered by the Commission. No written comments were received. At the meeting, the president of the ERMCA had no objections to adoption of the scheduled charges.

The Housing Authority agrees that residents should not be charged for the replacement or repair of old or defective items and the Authority does not do so.

**9. Comment on Page 4, Five-Year Plan, Goals, Paragraph 2** CLAS states that the “Housing Authority should...add to its list of objectives a goal to ensure equal opportunity and affirmatively further fair housing.”

**Response:** Federal regulations (24 CFR 903.7(o)) state that the Housing Authority must “certify” that it will carry out our plan in conformance with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the

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Americans with Disabilities Act of 1990. The Housing Authority will do so upon adoption of its plan.

**10. Comment on Page 4, Annual Plan, Executive Summary:** CLAS states that it “was not informed of any town hall meetings.”

**Response:** The Town Hall meetings were public meetings and, as such, were noticed in the newspaper and several public places.

**11. Comment on Page 5, Executive Summary, top of the page:** CLAS states that the “Housing Authority should specify what community partners were able to participate in the planning process and how residents and Section 8 participants were encouraged to participate.”

**Response:** The Housing Authority works with quite a few agencies such as College of Alameda, the City of Alameda Community Development Department, Red Cross, Sentinel Fair Housing, etc. This meeting, not required under federal regulations, was simply an extra step the Housing Authority took in order to solicit input from a broader segment of the community.

In addition to the usual public noticing, the Housing Authority encouraged participation by sending notices about the Town Hall meetings to all residents and Section 8 participants.

**12. Comment on Page 5, Statement of Housing Needs, Housing Needs, Paragraph 1:** CLAS states that the Housing Authority should have used projections rather than data from the Consolidated Plan to determine housing need.

**Response:** Federal guidelines specifically state that housing authorities may use data from the Consolidated Plan, indeed emphasizes the appropriateness of this source. The Housing Authority used the Consolidated Plan data because it was the most recent and accurate information available that also has been approved by HUD.

**13. Comment on Page 5, Housing Needs, Paragraph 2:** CLAS states that the “Housing Authority is supposed to rate the impact of race or ethnicity on the housing needs of families in its jurisdiction.”

**Response:** The Final Rule states: “A PHA must make reasonable efforts to identify the housing needs of [extremely low-income families, elderly and disabled families, and households of various ethnic groups residing in the jurisdiction or on the waiting list] based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data.” The Housing Authority made a reasonable effort to provide the information required under the Final Rule using information available.

**14. Comment on Page 5, Housing Needs, Paragraph 3:** CLAS states that the “Housing Authority has also identified the housing needs of extremely low-income (below 30% of AMI) and very low-income families (between 31% and 50% of AMI) as being the same as far as affordability, etc.”

**Response:** The Housing Authority has identified affordability as having a “severe impact” on both classes of families. The Housing Authority stands by that assessment.

**15. Comment on Page 6, Strategy for Addressing Needs, Paragraph 1:** CLAS states that the Housing Authority “should target 79% extremely low-income for both its public housing units and its Section 8 participants....”

**Response:** As stated above, the Housing Authority believes that both extremely low and very low-income families have the same problem with affordability in Alameda; therefore, a change from the HUD-mandated 75% targeting to 79% will not assist everyone in need in this community.

**16. Comment on Page 6, Strategy for Addressing Needs, Paragraph 2:** CLAS states the “Housing Authority should also implement a policy to assist Section 8 participants in finding housing to ensure that it meets its targeting requirements.” CLAS also states that the Housing Authority should describe exactly what measures it will take to do the following: The Housing Authority will ‘Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required.’ CLAS states that the “Housing Authority should also explain how its rent policies that encourage work could possibly help target available assistance to extremely low-income families...”

**Response:** The Housing Authority’s proposed Five-Year Plan has a goal to “Maintain and expand quality, safe and affordable housing throughout the city of Alameda.” Objectives include developing additional housing units, adding more landlords to the Section 8 program, and educating the citizenry on the need for additional affordable housing. The Housing Authority believes, therefore, that this policy is in place.

It is correct that the Housing Authority checked the box in the HUD template for its Agency Plan that says it will “Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required.” The Final Rule does not state that a description of the measures to be taken and how success will be measured must be included. The Housing Authority does not believe it is necessary nor required to include this level of detail in the Annual Plan. The Plan is a planning document rather than a procedures manual.

The Housing Authority has adopted a rent policy that encourages work for families in all income groups as stated in the Annual Plan on page 9. For instance, if a very-low income family’s income increases between re-examinations, the Housing Authority will not increase the family’s rent until the next regularly-scheduled re-examination. The flat rent is also an option for Esperanza public housing residents. The flat rent gives the family the option of accepting a job with a higher income without proportionally increasing the family’s rent.

**17. Comment on Page 6, Strategy for Addressing Needs, Paragraph 3:** The Housing Authority should specify goals for each of its other stated strategies. For example, on page 8, the Housing Authority should analyze the current turnover time and renovation time for public housing units, and set specific goals to reduce those times. The Housing Authority also states that it will maintain or increase section 8 lease-up rates, so it should specify what the current rate is and what quantifiable goals it has to improve that rate.

**Response:** The Housing Authority believes that CLAS is asking for a level of specificity in the Annual Plan that is not appropriate.

**18. Comment on Page 7, Eligibility (Public Housing and Section 8):** CLAS states “If the Housing Authority finds that an applicant has had problems paying rent, the Housing Authority should take into consideration whether the applicant was paying more than 30% of their adjusted monthly income when they were having such trouble.

**Response:** The Housing Authority considers an applicant’s past rental payment history. The Authority also considers mitigating circumstances such as the amount of rent being paid as a proportion of the applicant’s income when determining eligibility.

**19. Comment on Page 7, Assignment:** CLAS states that “If a current public housing tenant is required to move from their unit, for example if they must move to a smaller unit, they should be given the option of moving to another unit in the complex they currently reside in.”

**Response:** The Housing Authority has never required a family to move to another complex nor is it implied in the Annual Plan.

**20. Comment on Page 7, Admissions Preferences (Public Housing and Section 8):** The Housing Authority has a residency preference for persons living or working in Alameda. This preference likely violates fair housing laws. HUD requires that the PHA policies in the Annual Plan “must specify that use of a residency preference will not have the purpose or effect of delaying or otherwise denying admission to the program based on the race, color, ethnic origin, gender, religion, disability, or age of any member of an applicant family.” 24 CFR § 982.207(b)(1)(iii). The Housing Authority should obtain and analyze information about the demographics in Alameda and surrounding areas and the trends in the region in order to be able to discern whether a residency preference would violate the fair housing laws.

**Response:** According to 24 CFR § 982.207(b)(1)(ii) “A county or municipality may be used as a residency preference area.” The Housing Authority believes its residency preference is consistent with federal regulations. The Housing Authority’s *Administrative Plan* will be revised to specify that “The use of the residency preference will not have the purpose or effect of delaying or otherwise denying admission to the program based on the race, color, ethnic origin, gender, religion, disability, or age of any member of an applicant family.” No change to the Annual Plan is required.

**21. Comment on Page 8, Admissions Preferences, Paragraph 1:** The Housing Authority has also adopted a preference for working families and those unable to work because of age or disability. Although a working preference may be acceptable under federal law, it violates California state law. As of January 1, 2000, California’s Fair Employment and Housing Act was amended to include source of income as a class protected from discrimination until January 1, 2005.

**Response:** The Housing Authority believes the Working Family preference is lawful and consistent with federal law under the Quality Housing and Work Responsibility Act and its statutory goals of work incentive and deconcentration of poverty.

**22. Comment on Page 8, Admissions Preferences, Paragraph 2** The Housing Authority also has adopted a preference for a broad range of incomes.... If this policy is intended to deconcentrate poverty and encourage income mixing, the Housing Authority should do so by policies which help lower-income families increase their incomes.... If the Housing Authority’s policy will effectively result in skipping lower income families to reach higher income families on the waiting list, then it is prohibited in the Section 8 program....

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**Response:** The Housing Authority's broad range of incomes preference is intended to deconcentrate poverty and encourage income mixing at the Housing Authority's only public housing complex. This preference does not result in lower income families being skipped on the waiting list for the Section 8 program.

**23. Comment on Page 8, Admissions Preferences, Paragraph 3:** The Housing Authority has eliminated its preferences for the displaced, those living in substandard housing, and those experiencing a severe cost burden.... If the Housing Authority retains preferences for applicants residing in substandard housing, those who are displaced or homeless, and those with severe cost burdens, the city's ability to address the housing problems of residents will be enhanced and hardship for the tenants will be minimized.

**Response:** HUD no longer mandates federal preferences. The Housing Authority chooses not to adopt these preferences.

**24. Comment on Page 9, Admissions Preferences, Paragraph 1:** [T]he Housing Authority should consider whether to adopt a local preference for admission of families that include victims of domestic violence.

**Response:** The Housing Authority has considered this comment and chooses not to adopt this preference.

**25. Comment on Page 9, Section 8 Search Time:** The Housing Authority's policy on pages 20-21 should explicitly state that it will extend the 120 day search term if necessary as a reasonable accommodation.... The Housing Authority should also allow for extensions beyond 120 days for other families under special circumstances, and should make this policy explicit in its Plan. The Housing Authority should use its discretion to grant families more time when they are unable to find housing with their voucher in 120 days. The Housing Authority should not only accommodate these families with longer extensions, but also otherwise assist them in their search for housing, where possible.

**Response:** Under the current difficult housing market, the Housing Authority agrees that extensions beyond 120 days as a reasonable accommodation for the disabled are warranted and will amend its Administrative Plan to that effect.

**26. Comment on Page 10, Income Based Rent and Flat Rent:** The Housing Authority should specify in its Plan and otherwise notify residents and participants of the benefits of switching to a flat rent, and that a tenant who chooses a flat rent can return to a 30% formula rent at any time.... Also, the Housing Authority should give anyone who was recertified after September 30, 1999 the option of moving to a flat rent before their next recertification.

**Response:** The HUD template does not have a place, nor is it required to include the Housing Authority's policy on flat rents and income-based rents. This level of specificity can be found in the Housing Authority's *Admissions and Continued Occupancy Policy* (ACOP). The ACOP states that a family recertified after October 1, 1999, has the option of moving to a flat rent before the next recertification. The Housing Authority will correct the ACOP to read "on or after October 1, 1999."

**27. Comment on Page 10, Minimum Rent:** The Housing Authority should conduct a cost benefit analysis to determine whether imposing a \$50 minimum rent on public housing residents

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and tenant-based Section 8 participants is worthwhile.... The Housing Authority must therefore notify tenants of their right to receive a hardship exemption, initially and at any time they become unable to pay their minimum rent.

**Response:** The Housing Authority considered the cost involved in administering the minimum rent and believes that the amounts established are beneficial to the Housing Authority and to its customers. The Housing Authority initially notified tenants of their right to receive a hardship exemption and does so at other times as appropriate. This information also is available in the ACOP and *Administrative Plan*.

**28. Comment on Page 10, Section 8 Payment Standards:** The Housing Authority should conduct an analysis considering whether to adopt exception rents up to 120% of fair market rent for certain areas. Again, the Housing Authority is required to affirmatively further fair housing. Depending on the demographics in Alameda, if section 8 tenants cannot afford to live in certain areas because the payment standard is too low, and the Housing Authority is not using its authority to seek and grant area exception rents, then it is not complying with its duty to affirmatively further fair housing.

**Response:** The Housing Authority has aggressively pursued increases in the payment standard. The Housing Authority does not have the authority to adopt exception rents up to 120% of fair market rent (FMR) without HUD approval. Obtaining HUD approval requires gathering a substantial amount of documentation. Nevertheless, the Housing Authority has been gathering that data for some time. When the information that is needed has been gathered and put in the appropriate format for HUD, the Housing Authority will submit this data to HUD with a request for a payment standard that is 120% of FMR for the entire city of Alameda.

**29. Comment on Page 10, Homeownership:** CLAS's clients want the option to purchase their units at Esperanza, and assistance from the Housing Authority in purchasing homes elsewhere.... On page 3 of the Five-Year Plan, the Housing Authority has an objective to "Move 20 families into homeownership by 2005," and on page 45 of its Annual Plan, the Housing Authority states that it will "Work toward moving 20 families into homeownership by 2005." The Housing Authority must elaborate on its plan to move families into homeownership. It must have goals set out for each year, and describe how it plans to implement specific programs to meet those goals. Homeownership at Esperanza would also help the Housing Authority achieve its deconcentration and income mixing goals. If any of the existing public housing units do eventually become resident owned, the Housing Authority should replace each of those units with public housing units elsewhere, so that the public rental unit stock is not diminished.

**Response:** The Housing Authority Five-Year Plan is a planning document, not a procedural manual. Specific means to achieve goals and objectives are not appropriate to this document.

As stated in the Annual Plan, the Housing Authority does not have a homeownership policy specifically for public housing residents or Section 8 participants.

**30. Comment on Page 11, Other Information, Paragraph 1** On page 43, under the Resident Advisory Board Recommendations (18.A.3), the Housing Authority is supposed to list any changes it made to the Plan in response to the Resident Advisory Board's comments, but it has not.

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**Response:** The Housing Authority noted these changes with the RAC's recommendations in Attachment E of the Plan. The Housing Authority will list the changes in section 18.A.3.

**31. Comment on Page 11, Other Information, Paragraph 2** On page 44, in the Housing Authority's Statement of Consistency with the Consolidated Plan, it is supposed to list the activities it will undertake in the coming year, but instead it reiterates its five-year objectives.... Moreover, this section asks for specific activities, not just goals and guiding principles.

**Response:** The Housing Authority listed its goal and those objectives (i.e., activities) that would be undertaken that are consistent with the initiatives contained in the Consolidated Plan. Some of the objectives listed are for a five-year period; others are for the first year only or for each of the five years. For instance, the first objective to "Maintain the existing 572 rental housing units and maintain housing currently available under the Section 8 program" is applicable in each year of the five-year period. The objective to "Lease up 40 additional families in the Section 8 program" is specific to the first year. The other three objectives are to be accomplished over a three- to five-year period. These activities will be ongoing during each of the years specified.

The Housing Authority believes that these objectives are "activities" as intended for this section.

**32. Comment on Page 11, Other Information, Paragraph 3:** The Housing Authority is a high performing PHA and is therefore not required by HUD to complete all of the sections in the Plan, including the sections on Operations and Management, PHA Grievance Procedures, PHA Community Service and Self-Sufficiency Programs, PHA Safety and Crime Prevention Measures, and PHA Asset Management. Even though not required by HUD, the Housing Authority should still complete these sections in order to give public housing tenants and Section 8 participants, applicants, and the public the opportunity to examine the Housing Authority's policies in one concise document.

**Response:** As a high performing PHA, the Housing Authority is not mandated and chooses not to complete the sections mentioned above.

**33. Comment on Page 11, Deconcentration Policy and Targeting (Attachment A):** Page 47 of the Annual Plan states that "The Housing Authority may admit less than 40 percent of the families with incomes below 30 percent of the median income (very poor families) in a fiscal year to the extent that they have not provided more than 75 percent of the newly available vouchers to very poor families." (emphasis added). The word "not" must be removed to comply with HUD requirements. The same error is made in section 9.4 of the Admissions and Continued Occupancy Policy.

**Response:** The word "not" will be removed; it was a typographical error.

**34. Comment on Page 12, Deconcentration Policy..., Paragraph 1:** On page 48, the Plan states that "Each year the Housing Authority will conduct an analysis of tenant income mix data within the complex...." It is not clear what the tenant income mix is being compared to in order to determine whether it is higher or lower – higher or lower than what?

**Response:** The Housing Authority agrees that the policy is not clear and will clarify its Deconcentration Policy. The Housing Authority will analyze the income mix of families within the complex to determine the percentage of families who are extremely low, very

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low, low and other. If the majority of families have incomes at or above 50 percent of median, the complex will be designated a “higher income complex.”

**35. Comment on Page 12, Deconcentration Policy..., Paragraph 2:** On page 49, the Housing Authority states that “The skipping of a family on the waiting list to reach another family in order to implement the policy under this section shall not be considered an...adverse action and shall not be contestable.” [I]f the Housing Authority’s policy will effectively result in skipping lower income families to reach higher income families on the Section 8 waiting list, then it is prohibited under 24 CFR § 982.207(d).

**Response:** Families are not skipped for the Section 8 program.

**36. Comment on Page 12, ACOP, Grounds for Denial:** It is unclear from the Housing Authority’s Plan if it will penalize all family members if one member of the family is ineligible for assistance.... The Housing Authority must consider the mitigating circumstances and should use its discretion to impose, as a condition of continued assistance for other family members, a requirement that any culpable family members will not reside in the unit.

**Response:** The Housing Authority does not believe a change to the ACOP is necessary.

**37. Comment on Page 12, ACOP, Occupancy Standard:** In determining bedroom sizes for Section 8 and public housing tenants, the Housing Authority’s policy at section 9.2 does not allow for separate rooms for members of the opposite sex, so that a boy and a girl, even if adolescents, would have to share a bedroom. Forcing a brother and sister, or some other opposite sex combination of household members to share a bedroom could be disastrous. Our clients and several other members have expressed grave distress over this policy, telling from experience the horrors of forcing adolescent or pre-adolescent opposite sex children to share a bedroom.... The Housing Authority should provide public housing units and Section 8 subsidies that would allow unpartnered members of the opposite sex to have separate bedrooms.

Although the Housing Authority’s policy does not require a parent or guardian to share a bedroom with a child, it does not make any exceptions for other members of different generations who would be forced to share a bedroom.... The Housing Authority should provide for a separate bedroom for members of different generations, so that they will not have to share a bedroom.

**Response:** The Housing Authority’s occupancy and subsidy standards are based on the income and the number of people in a family. The Authority believes this is an equitable and fair method of assigning a unit or voucher.

**38. Comment on Page 13, ACOP, Occupancy Standard, Paragraphs 2 and 3:** The Housing Authority has responded to these concerns of the RAC by stating that “The subsidy standards do not require these groups to share a bedroom; they simply determine the amount of subsidy the family will receive.” See the RAC’s comments on page 61. However, the Housing Authority’s policy also states that “Children and their single, head-of-household parent will not be required to share a bedroom.” The Housing Authority’s policy also states that “The living room will not be used as a bedroom, except in the cases of single bedroom units.” See page 12 of the Admissions and Occupancy Policy. Because the RAC pointed out that this language implied that a tenant could not use a living room as a bedroom, the Housing Authority has stated that it will change it to “The Housing Authority will not consider the living room as a bedroom in assigning subsidy standards.” See the RAC’s comments on page 61. It is unclear if that change also applies to the Housing Authority’s occupancy standards in public housing.

The last part of Section 9.2 states that “Exceptions to normal bedroom size standards include the following:”, but no exceptions are listed. The Housing Authority must provide this list of exceptions. In the Section 8 Administrative Plan, on page SS-2, the Housing Authority states that it “will grant exceptions from the Subsidy Standards if the Authority determines the exceptions are justified by the relationship, age, sex, health, or handicap of family members, or other circumstances.” This exception should also apply to the public housing occupancy standards, and it should explicitly encompass situations where adolescent opposite sex children and members of different generations would have to share a bedroom in either public housing or Section 8.

**Response:** The Housing Authority’s occupancy/subsidy standards are consistent for the public housing and Section 8 programs. Wording in the *Administrative Plan* and the ACOP will be changed to make that clear.

The last part of Section 9.2 does not list exceptions. This phrase was included in the section in error and will be omitted. The exceptions to the Occupancy Standards in the ACOP begin on the previous page (page 25).

**39. Comment on Page 14, Section 8 Administrative Plan, Eligibility and Placement on the Waiting List, Paragraph 1:** On page WL-3, paragraph c., the Housing Authority states its policy to deny a family housing assistance to: “Applicants found to have been convicted of drug-related or violent criminal activity in the last 10 years. (Convictions for possession of an illegal controlled substance, only if occurring in the past 12 months, is reason for denying eligibility).” However, under 24 CFR § 982.553(b), “If the PHA seeks to deny or terminate assistance because of illegal use, or possession for personal use, of a controlled substance, such use or possession must have occurred within one year before the date that the PHA provides notice to the family of the PHA determination to deny or terminate assistance.” The parenthetical exception should therefore include use of a controlled substance, in addition to possession.... [I]f the Housing Authority seeks to deny assistance because of illegal use, or possession for personal use, of a controlled substance, such use or possession must have occurred within one year.

**Response:** The Housing Authority agrees with CLAS and will revise the *Administrative Plan* to that effect.

**40. Comment on Page 14, Section 8 Administrative Plan, Eligibility..., Paragraph 2:** Again, it is unclear from the Housing Authority’s Plan if it will penalize all family members if one member of the family is ineligible for assistance.... In the Section 8 program, the “PHA may impose, as a condition of continued assistance for other family members, a requirement that other family members who participated in or were culpable for the action or failure will not reside in the unit. The PHA may permit the other members of a participant family to continue receiving assistance.” The Housing Authority should not penalize the entire household for the actions of an individual; instead it must consider the mitigating circumstances and use its discretion to impose, as a condition of continued assistance for other family members, a requirement that any culpable family members will not reside in the unit.

**Response:** The Housing Authority does not believe that a change in the *Administrative Plan* is needed.

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**41. Comment on Page 14, Equal Opportunity:** On page SF-1, the Housing Authority should add source of income to its list of grounds of prohibited discrimination in the selection process. The Housing Authority must comply with California's Fair Employment and Housing Act, which was amended as of January 1, 2000, to prohibit source of income discrimination... Moreover, this equal opportunity pledge should apply to everything that the Housing Authority does, not just its selection process.

**Response:** The introduction to the *Administrative Plan* states "It is the policy of the Housing Authority to comply fully with all federal, state and local non-discrimination laws and with the rules and regulations governing Fair Housing and Equal Opportunity in housing and employment." The Housing Authority believes that this statement is sufficient and that the specific section entitled "Equal Opportunity" on Page SF-1 is unnecessary, redundant and will be deleted.

**42. Comment on Page 15, Subsidy Standards:** For comments on the Subsidy Standards found at page SS-1, please see the above comments on the public housing occupancy standards.

**Response:** See the Housing Authority's response to comment 37.

**43. Comment on Page 15, Other, Paragraph 1:** The Housing Authority's Administrative Plan should also state that landlords are required to give a tenant 90 days notice if they are terminating a Section 8 contract. As of January 1, 2000, California law requires a landlord who terminates or fails to renew a Section 8 contract to give a 90 day written notice to the tenant... In addition to amending its Administrative Plan, the Housing Authority should notify landlords participating in the Section 8 program that they must now give tenants 90 days written notice in order to terminate the contract, and that the tenant is not obligated to pay more than the tenant's portion of the rent for those 90 days.

**Response:** There is no requirement to include this provision in the Agency Plan; the *Administrative Plan* was provided for review only as a Supporting Document.

**44. Comment on Page 15, Other, Paragraph 2:** The Housing Authority should also consider adopting a policy to grant a Section 8 tenant the money for their security deposit or to make a loan to them and enter into a repayment plan....

**Response:** The Housing Authority has a program to assist Section 8 tenants with security deposits. The Housing Authority, however, does not believe that a change to the Agency Plans or the *Administrative Plan* is needed.

Comments from April 14, 2000, Resident Advisory Committee Meeting

Definition of Substantial Deviation

1. An RAC member asked for a detailed explanation of the definition and what it means to the RAC.

**Response:** If "substantial deviation or significant amendment or modification" to the Agency Plan was determined to exist, an RAC meeting would be called to discuss the change and allow the RAC to make comments. This would happen when the change meets three criteria: 1) the change would have to be discretionary, 2) the change would be

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a goal or a policy contained in the Five-Year or Annual Plan, and 3) it would be a change requiring Housing Commission action to adopt.

2. An RAC members said that the RAC did not have an opportunity to participate in developing the Agency Plan. She also stated that the RAC was rushed.  
**Response:** All residents, Section 8 participants and the public had an opportunity to participate in the process through a series of Town Hall meetings. The RAC met a total of five times to discuss the Agency Plan and to make comments and suggestions. The Housing Authority believes there was opportunity to participate in the development of the Agency Plan. The Housing Authority provided RAC members with documents to be reviewed and discussed at RAC meetings in advance of the meetings. No time limit was set on discussion. The Housing Authority does not believe RAC members were rushed to make decisions about the Agency Plan.
3. An RAC member stated that she did not believe the process was rushed. She also believes that residents at the complex where she lives would not want to be involved in the level of detail mentioned by the previous RAC member.  
**Response:** None.
4. An RAC member said he was unfamiliar with issues at Esperanza (public housing complex).  
**Response:** None.
5. Two RAC members said the definition was fine. One member abstained.  
**Response:** The meeting facilitator asked the RAC if there was consensus to accept the definition of substantial deviation or significant amendments or modifications and the RAC agreed that there was a consensus to do so.

Extending the Deadline to Lease a Unit beyond 120 days as a Reasonable Accommodation for Disabled Section 8 participants.

1. An RAC member asked if Section 8 voucher holders are able to lease up with the current skyrocketing rents.  
**Response:** The Housing Authority's current lease up rate is less than 50 percent. The Authority is taking steps to increase landlord participation, increase the payment standard, etc., to improve the lease up rate.
2. An RAC member requested a discussion on the written comments by Community Legal Aid Society or CLAS given to the Housing Commission at the public hearing on March 15, 2000.  
**Response:** The Housing Authority responded to CLAS comments separately.
3. An RAC member asked for a definition of "disabled."  
**Response:** The Housing Authority uses the federal definition of disabled as defined in Section 223 of the Social Security Act.
4. Two RAC members asked for an explanation of how the Section 8 leasing process works.  
**Response:** An explanation was provided.

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The meeting facilitator asked if there was RAC consensus on the change to the Agency Plan to allow for an increase in the lease up deadline beyond 120 days. The RAC agreed that there was a consensus to do so.