

HOUSING AUTHORITY OF THE CITY OF BRIDGEPORT

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July 17, 2012

Ms. Jennifer R. Gottlieb
Program Center Coordinator
U.S. Department of Housing and
Urban Development
Office of Public Housing
20 Church Street, 10th floor
Hartford, Connecticut 06103

Dear Ms. Gottlieb:

Subject: Annual and Five Year Plan

The Housing Authority of the City of Bridgeport is pleased to submit the 2012-2017 Annual and Five Year Plan. Also enclosed are the revised Admission and Continued Occupancy Plan and the Section 8 Administrative Plan for your review.

If you require additional information, please feel free to contact Mrs. Kimberly Ford at 203-337-8816.

Sincerely yours,

HOUSING AUTHORITY OF
THE CITY OF BRIDGEPORT

A handwritten signature in black ink, appearing to read "Nicholas A. Calace", is written over the typed name and title.

Nicholas A. Calace
Executive Director

NAC:ktf
Enclosure

PHA 5-Year and Annual Plan	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 4/30/2011
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1.0	PHA Information PHA Name: <u>Housing Authority of the City of Bridgeport</u> PHA Code: <u>CT001</u> PHA Type: <input type="checkbox"/> Small <input type="checkbox"/> High Performing <input checked="" type="checkbox"/> Standard <input type="checkbox"/> HCV (Section 8) PHA Fiscal Year Beginning: (MM/YYYY): <u>10/2012</u>					
2.0	Inventory (based on ACC units at time of FY beginning in 1.0 above) Number of PH units: <u>2524</u> Number of HCV units: <u>2551</u>					
3.0	Submission Type <input checked="" type="checkbox"/> 5-Year and Annual Plan <input type="checkbox"/> Annual Plan Only <input type="checkbox"/> 5-Year Plan Only					
4.0	PHA Consortia <input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below.)					
	Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program	
					PH	HCV
	PHA 1:n/a					
	PHA 2:					
	PHA 3:					
5.0	5-Year Plan. Complete items 5.1 and 5.2 only at 5-Year Plan update.					
5.1	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 for the next five years: The Housing Authority of the City of Bridgeport (HACB) is committed to providing quality, affordable housing and services in an efficient effective and creative manner. We will serve our residents by providing affordable housing opportunities in a safe environment; revitalizing and maintaining neighborhoods; and forming effective partnerships to maximize social and economic opportunities. This mission shall be accomplished by a fiscally responsible, ethical and professional organization committed to excellence in public service					
5.2	Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. See attached pages 1-12					
6.0	PHA Plan Update (a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission: (b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions. The following PHA Plan elements have been revised by HACB since its Annual Plan Submission: 1. Waiting List Organizations 2. HACB's Plans (including attachments) are available for public inspection at: ➤ HACB's main administrative office (150 Highland Avenue)					
7.0	Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. Include statements related to these programs as applicable. See attached Page 34					
8.0	Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable. See attached Page 48					

8.1	Capital Fund Program Annual Statement/Performance and Evaluation Report. As part of the PHA 5-Year and Annual Plan, annually complete and submit the <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> , form HUD-50075.1, for each current and open CFP grant and CFFP financing. See attached Page 48
8.2	Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the <i>Capital Fund Program Five-Year Action Plan</i> , form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan. See attached Page 48
8.3	Capital Fund Financing Program (CFFP). <input checked="" type="checkbox"/> Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements. See attached page 48
9.0	Housing Needs. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. See attached See attached page48

9.1	Strategy for Addressing Housing 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. Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan. See attached Page 64
10.0	Additional Information. Describe the following, as well as any additional information HUD has requested. (a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan. See attached (b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification" See attached page 68

11.0	Required Submission for HUD Field Office Review. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. Note: Faxed copies of these documents will not be accepted by the Field Office. (a) Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> (which includes all certifications relating to Civil Rights) (b) Form HUD-50070, <i>Certification for a Drug-Free Workplace</i> (PHAs receiving CFP grants only) (c) Form HUD-50071, <i>Certification of Payments to Influence Federal Transactions</i> (PHAs receiving CFP grants only) (d) Form SF-LLL, <i>Disclosure of Lobbying Activities</i> (PHAs receiving CFP grants only) (e) Form SF-LLL-A, <i>Disclosure of Lobbying Activities Continuation Sheet</i> (PHAs receiving CFP grants only) (f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations. (g) Challenged Elements (h) Form HUD-50075.1, <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> (PHAs receiving CFP grants only) (i) Form HUD-50075.2, <i>Capital Fund Program Five-Year Action Plan</i> (PHAs receiving CFP grants only) See attached
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This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced 5-Year and Annual PHA Plans. The 5-Year and Annual PHA plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission and strategies for serving the needs of low-income and very low-income families. This form is to be used by all PHA types for submission of the 5-Year and Annual Plans to HUD. Public reporting burden for this information collection is estimated to average 12.68 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

Instructions form HUD-50075

Applicability. This form is to be used by all Public Housing Agencies (PHAs) with Fiscal Year beginning April 1, 2008 for the submission of their 5-Year and Annual Plan in accordance with 24 CFR Part 903. The previous version may be used only through April 30, 2008.

1.0 PHA Information

Include the full PHA name, PHA code, PHA type, and PHA Fiscal Year Beginning (MM/YYYY).

2.0 Inventory

Under each program, enter the number of Annual Contributions Contract (ACC) Public Housing (PH) and Section 8 units (HCV).

3.0 Submission Type

Indicate whether this submission is for an Annual and Five Year Plan, Annual Plan only, or 5-Year Plan only.

4.0 PHA Consortia

Check box if submitting a Joint PHA Plan and complete the table.

5.0 Five-Year Plan

Identify the PHA's Mission, Goals and/or Objectives (24 CFR 903.6). Complete only at 5-Year update.

5.1 Mission. A statement of the mission of the public housing agency for serving the needs of low-income, very low-income, and extremely low-income families in the jurisdiction of the PHA during the years covered under the plan.

5.2 Goals and Objectives. Identify quantifiable goals and objectives that will enable the PHA to serve the needs of low income, very low-income, and extremely low-income families.

6.0 PHA Plan Update. In addition to the items captured in the Plan template, PHAs must have the elements listed below readily available to the public. Additionally, a PHA must:

- (a) Identify specifically which plan elements have been revised since the PHA's prior plan submission.
- (b) Identify where the 5-Year and Annual Plan may be obtained by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on its official website. PHAs

are also encouraged to provide each resident council a copy of its 5-Year and Annual Plan.

PHA Plan Elements. (24 CFR 903.7)

1. **Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures.** Describe the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV and unit assignment policies for public housing; and procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists.
2. **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA Operating, Capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources.
3. **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units.
4. **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA.
5. **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants.
6. **Designated Housing for Elderly and Disabled Families.** With respect to public housing projects owned, assisted, or operated by the PHA, describe any projects (or portions thereof), in the upcoming

fiscal year, that the PHA has designated or will apply for designation for occupancy by elderly and disabled families. The description shall include the following information: **1)** development name and number; **2)** designation type; **3)** application status; **4)** date the designation was approved, submitted, or planned for submission, and; **5)** the number of units affected.

7. **Community Service and Self-Sufficiency.** A description of: **(1)** Any programs relating to services and amenities provided or offered to assisted families; **(2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS; **(3)** How the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. **(Note: applies to only public housing).**
8. **Safety and Crime Prevention.** For public housing only, describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must include: **(i)** A description of the need for measures to ensure the safety of public housing residents; **(ii)** A description of any crime prevention activities conducted or to be conducted by the PHA; and **(iii)** A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities.
9. **Pets.** A statement describing the PHAs policies and requirements pertaining to the ownership of pets in public housing.
10. **Civil Rights Certification.** A PHA will be considered in compliance with the Civil Rights and AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction.
11. **Fiscal Year Audit.** The results of the most recent fiscal year audit for the PHA.
12. **Asset Management.** A statement of how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory.
13. **Violence Against Women Act (VAWA).** A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service

providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families.

7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers

- (a) Hope VI or Mixed Finance Modernization or Development.** **1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Mixed Finance Modernization or Development; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI, Mixed Finance Modernization or Development, is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>
- (b) Demolition and/or Disposition.** With respect to public housing projects owned by the PHA and subject to ACCs under the Act: **(1)** A description of any housing (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and **(2)** A timetable for the demolition or disposition. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_disposition/index.cfm
Note: This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed.
- (c) Conversion of Public Housing.** With respect to public housing owned by a PHA: **1)** A description of any building or buildings (including project number and unit count) that the PHA is required to convert to tenant-based assistance or that the public housing agency plans to voluntarily convert; **2)** An analysis of the projects or buildings required to be converted; and **3)** A statement of the amount of assistance received under this chapter to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>
- (d) Homeownership.** A description of any homeownership (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval.

- (e) **Project-based Vouchers.** If the PHA wishes to use the project-based voucher program, a statement of the projected number of project-based units and general locations and how project basing would be consistent with its PHA Plan.

8.0 Capital Improvements. This section provides information on a PHA's Capital Fund Program. With respect to public housing projects owned, assisted, or operated by the public housing agency, a plan describing the capital improvements necessary to ensure long-term physical and social viability of the projects must be completed along with the required forms. Items identified in 8.1 through 8.3, must be signed where directed and transmitted electronically along with the PHA's Annual Plan submission.

8.1 Capital Fund Program Annual Statement/Performance and Evaluation Report. PHAs must complete the *Capital Fund Program Annual Statement/Performance and Evaluation Report* (form HUD-50075.1), for each Capital Fund Program (CFP) to be undertaken with the current year's CFP funds or with CFFP proceeds. Additionally, the form shall be used for the following purposes:

- (a) To submit the initial budget for a new grant or CFFP;
- (b) To report on the Performance and Evaluation Report progress on any open grants previously funded or CFFP; and
- (c) To record a budget revision on a previously approved open grant or CFFP, e.g., additions or deletions of work items, modification of budgeted amounts that have been undertaken since the submission of the last Annual Plan. The Capital Fund Program Annual Statement/Performance and Evaluation Report must be submitted annually.

Additionally, PHAs shall complete the Performance and Evaluation Report section (see footnote 2) of the *Capital Fund Program Annual Statement/Performance and Evaluation* (form HUD-50075.1), at the following times:

1. At the end of the program year; until the program is completed or all funds are expended;
2. When revisions to the Annual Statement are made, which do not require prior HUD approval, (e.g., expenditures for emergency work, revisions resulting from the PHAs application of fungibility); and
3. Upon completion or termination of the activities funded in a specific capital fund program year.

8.2 Capital Fund Program Five-Year Action Plan

PHAs must submit the *Capital Fund Program Five-Year Action Plan* (form HUD-50075.2) for the entire PHA portfolio for the first year of participation in the CFP and annual update thereafter to eliminate the previous year and to add a new fifth year (rolling basis) so that the form always covers the present five-year period beginning with the current year.

8.3 Capital Fund Financing Program (CFFP). Separate, written HUD approval is required if the PHA proposes to pledge any portion of its CFP/RHF funds to repay debt incurred to finance capital improvements. The PHA must identify in its Annual and 5-year capital plans the amount of the annual payments required to service the debt. The PHA must also submit an annual statement detailing the use of the CFFP proceeds. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/programs/ph/capfund/cffp.cfm>

9.0 Housing Needs. Provide a statement of the housing needs of families residing in the jurisdiction served by the PHA and the means by which the PHA intends, to the maximum extent practicable, to address those needs. (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).

9.1 Strategy for Addressing Housing Needs. Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).

10.0 Additional Information. Describe the following, as well as any additional information requested by HUD:

- (a) **Progress in Meeting Mission and Goals.** PHAs must include (i) a statement of the PHAs progress in meeting the mission and goals described in the 5-Year Plan; (ii) the basic criteria the PHA will use for determining a significant amendment from its 5-year Plan; and a significant amendment or modification to its 5-Year Plan and Annual Plan. (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).
- (b) **Significant Amendment and Substantial Deviation/Modification.** PHA must provide the definition of "significant amendment" and "substantial deviation/modification". (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan.)
- (c) PHAs must include or reference any applicable memorandum of agreement with HUD or any plan to improve performance. (Note: Standard and Troubled PHAs complete annually).

11.0 Required Submission for HUD Field Office Review. In order to be a complete package, PHAs must submit items (a) through (g), with signature by mail or electronically with scanned signatures. Items (h) and (i) shall be submitted electronically as an attachment to the PHA Plan.

- (a) Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*
- (b) Form HUD-50070, *Certification for a Drug-Free Workplace (PHAs receiving CFP grants only)*

- (c) Form HUD-50071, *Certification of Payments to Influence Federal Transactions* (PHAs receiving CFP grants only)
- (d) Form SF-LLL, *Disclosure of Lobbying Activities* (PHAs receiving CFP grants only)
- (e) Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet* (PHAs receiving CFP grants only)
- (f) Resident Advisory Board (RAB) comments.
- (g) Challenged Elements. Include any element(s) of the PHA Plan that is challenged.
- (h) Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report* (Must be attached electronically for PHAs receiving CFP grants only). See instructions in 8.1.
- (i) Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan* (Must be attached electronically for PHAs receiving CFP grants only). See instructions in 8.2.

5.2 Goals and Objectives

1. Increase the availability of decent, safe, and affordable housing.

- Expand the supply of assisted housing.

Objectives:

Reduce public housing vacancies:

- Continue to:
 - Utilize existing management system (implemented two years ago), which is benchmarked, measured and that holds staff accountable. HACB's occupancy and 30 day turnover rates continue to be at or very near our stated goals of 98 percent.
 - Increase capacity of the asset management staff through training and testing. Clerks have completed training and testing to become Certified Occupancy Specialists.
 - Implement measurement and verification phase of EPC.
 - Address perceived and actual safety and security concerns at our complexes by identifying and implementing security programs and protocols.
 - Increase staffing skills and capacity to address maintenance issues and PHAS Physical Management Score.
 - Develop and implement quality control and tracking mechanisms comparable to the private industry.
 - Implement a preventative maintenance program to minimize extensive repairs when a vacancy does occur.
- Actively advertise the public housing program to all applicants and affirmatively further fair housing.
- Engage consultants and learn from their examples to find efficiencies in the purchase of goods and services, in the management and operations of public housing, in the implementation of Section 8 administrative plan and in the development public/affordable housing units.
- Supplement basic staff through the renewed Architects and Engineers roster.

Leverage private or other public funds to create additional housing opportunities:

- Continue to:
 - The Father Panik Village (FPV) replacement housing program funds with funding streams secured in partnership agreements with City and State housing agencies, as well as with private housing industry organizations, developers and financial institutions and apply for Capital Fund Financing Program.
 - Develop the Project Based Section 8 program to incorporate a funding stream for supportive housing and maintain development

department staffing for the nascent Project-Based Section 8 program.

- Address the Marina Village site as a potential part of a Choice Neighborhoods application and ensure that plans incorporate leveraging the property for a minimum of 1:1 replacement on and off-site.
- Complete:
 - The Capital Fund Financing Program application in an effort to secure funds sufficient to complete the Authority's Voluntary Compliance Agreement with HUD. HACB received technical assistance from HUD for the feasibility of submitting an application to CFFP to complete the VCA. We are awaiting their response.
 - The analysis of vacant and/or occupied properties, including our administrative buildings, to determine the best use of each property. Proceeds from the sale of properties will be matched by the creation of incremental, affordable housing. The acquisition of incremental units will in some cases be counted toward the satisfaction of the FPV replacement and Pequonnock replacement programs (such units have to date been identified but not all have been acquired) and will otherwise count in supplement of the general agency portfolio.
 - The acquisition and rehabilitation of properties identified and approved by Connecticut Legal Services as appropriate for the completion of the FPV and Pequonnock replacement programs. Launch Building Blocks program, if funded, to help stabilize West Side neighborhoods while providing, through the Project-Based Section 8 program, supportive housing opportunities for special populations, e.g., homeless, veterans, survivors of domestic violence, refugees, and prisoners re-entering the community.
- Collaborate with other communities and community providers, as approved by the HACB Board of Commissioners in 2010, in the development of supportive and subsidized housing through our Project-Based Section 8 program.

Acquire or build units or developments:

- Complete:
 - The acquisition and rehabilitation of replacement housing in satisfaction of the Pequonnock Agreement and the amended Father Panik Village Settlement Agreement.
 - The comprehensive redevelopment plan for the combined former Marina Apartments and Pequonnock Apartments vacant land parcels, as well as the Father Panik Village land parcels, in cooperation with the City of Bridgeport and the private development team specific to the creation of new mixed-income rental and for-sale affordable public housing, perhaps as part of a

Choice Neighborhoods application or in a variety of developments per a comprehensive Master Plan.

- Negotiate and acquire, in partnership with City, State and private agencies and funders, new properties for HACB's Project Based Section 8 program, especially opportunities to expand supportive housing in those Section 8 units.
- Develop Albion Street property as part of the Father Panik Village Replacement Program using a variety of funding sources to include Development Fund, Replacement Housing Factor via CFFP, and Tax Credits.
- Acquire property from private and public sources in anticipation of meeting relocation needs of Marina Village Residents.
- Negotiate and acquire Pembroke Green homes for HACB's Project Based Section 8 program.
- Application for funding submitted to State of Connecticut Department of Economic and Community Development to build new workforce housing on the following parcels: 103-105 Center Street, 191-197 Herral Avenue, 323-325 Herral Avenue and 207 Catherine Street.
- Enter into equity sharing ownership positions with other developers and land owners to deconcentrate public housing and provide additional income to HACB or its affiliates.
- HACB through an associate not-for-profit will continue to utilize the Project Base Section 8 program to acquire and develop additional housing units supplementing public and private sources
- Purchase property within the city in support of other development for HACB long range goals.

Other:

- Maintain:
 - The utilization rate of Section 8 vouchers to 97 percent or better by implementing lease up marketing programs.
 - The protocol that ensures that HACB stays current with Section 8 program changes, takes advantage of regulatory waivers, and capitalizes fully on other Section 8 program guidelines and opportunities.
- Continue:
 - To train staff in their respective disciplines by providing access to in-house and off-site trainings and seminars.
 - Ongoing needs and housing market assessment consequent to the economic reversals ongoing since September 2008.
In an effort to redevelop the Marina Village neighborhood, look for potential office space for Highland Ave. and scattered site office in the Marina Village neighborhood.

- Improve the quality of assisted housing
Objectives:

Improve public housing management: (PHAS score) 81 as of 10/07/11;

Increase customer satisfaction:

- Implement preventative maintenance program.
- Implement general materials/replacement costs, as determined by inventory taken over the past year, for damaged property.
- Continue to fine tune emergency response procedures to ensure timely intervention to resident and property needs.
- Continue to:
 - Improve physical conditions at each site.
 - Increase security measures.
 - Evict non-performing households who cannot or do not elect to engage in supportive programming offered.

Concentrate on efforts to improve specific management functions:

- Continue:
 - Vacancy turnaround of less than 30 days.
 - Staff trainings to assure accuracy and consistency in meeting all reporting requirements.
 - To decrease tenant account receivables.
 - Strict enforcement of Admission and Continued Occupancy Policy and Lease.
- Fine tune and implement resident orientation to educate new tenants about HACB lease and resident obligations.
- Create customer service procedures to track progress and quality of work at specific locations and to identify operational deficiencies.

Renovate or modernize public housing units:

- Continue:
 - Implementation of the measurement and verification phase of the Energy Performance Contract (EPC). A staff training program is included in the EPC and is being implemented.
 - Implementation of the physical needs/modernization plan derived from the Physical Needs Assessment (PNA) of all HACB properties completed in 2008-09.
 - Under PIH Notice 2009-12, to employ force account to perform Capital Fund Stimulus grant work without prior HUD approval. Such items include vacancy reduction, building exterior work (roofs, siding, gutters, and downspouts), bathroom upgrades, HVAC replacement, facility improvements, etc.
 - To administer the ongoing Architects and Engineers and Indefinite Quantities contracts established in 2009 for the proactive and efficient contracting of routine and extraordinary construction, modernizations, planning and development items.

Demolish or dispose of obsolete public housing:

- Use PNA and City Master Plan data to develop redevelopment plans for Marina Village, Pequonnock Apartments and Marina Apartments. Coordinate master planning with City officials, residents, business community and legislative representatives.
- Develop a strategic plan regarding the maintenance of and/or disposition of the HACB's current inventory of underutilized vacant land parcels and existing rental properties to submit to HUD for approval. Potentially among the items in this plan are HACB-owned vacant properties that may be slated for demolition or sale.

Provide replacement public housing:

- Complete Father Panik Village Replacement Program, as amended. By June 2012, HACB will have completed the Pequonnock Apartment Settlement Agreement, as amended. The completion of these Settlement Agreements includes hard units and Project Based Section 8 units via Baldwin Holdings a subsidiary of HACB.
- Replace and supplement development staff to manage the implementation and administrative requirements of new programs initiated by HACB as well as through City, State and private partnerships.
- Continue to develop a revitalization/replacement plan for Marina Village that includes a replacement housing program to anticipate the needs of any Marina resident who might need to be relocated in order to implement the plan, such plan to be approved by HUD prior to implementation.

Provide replacement vouchers:

Other:

- Implement any updates to the Section 8 Administrative Plan accordingly.
- Ensure timely Housing Quality Standards Enforcement inspections.
- Continue Section 8 automated waiting list system.
- Advertise in different media to attract landlords in non-impacted areas and outside of Bridgeport.
- Administer the Re-Entry Program policy and procedures adopted by the Board in 2009 (FUSE program) with the ultimate goal of family re-unification.
- Contract for Section 8 services with entities outside of HACB
- Contract with other public housing authorities to provide public housing or Section 8 services.
- Contract or subcontract with other organizations to administer the Project Based Section 8 Certificate contract.
- Assist other PHAs in development activities in accordance with Memorandum of Agreement between the communities.

➤ Increase assisted housing choices

Objectives:

Provide voucher mobility counseling:

- As per Pequonnock Apartment Settlement Agreement.

Conduct outreach efforts to potential voucher landlords

- Advertise in different media to attract landlords in non-impacted areas.

Adjust voucher payment standards to maintain affordability but at maximum standard.

Implement Section 8 voucher homeownership program.

Implement public housing or other homeownership programs:

- HACB will continue to pursue Section 32 Program in cooperation with the City of Bridgeport and other local affordable homeownership counseling and down-payment assistance providers upon internal review of existing public housing properties that are most appropriate for homeownership.
- Work with a non-profit organization to develop 361 Bird Street into a Section 202 Supportive Housing for the Elderly. This will expand the supply of affordable housing with supportive services for the elderly.
- Participate in City initiatives supporting home ownership and rent-to-own programs.
- Expand homeownership programs as part of our effort to create mixed-income communities.

Maintain public housing site-based waiting lists for each development

Other:

- Continue progress toward satisfaction of the Voluntary Compliance Agreement (VCA) to create a housing authority responsive to the needs of disabled households. HACB will continue to retrofit existing units and sites for full compliance with the UFAS and to offer residents reasonable accommodations. HACB will also continue its progress in satisfaction of specific administrative improvements cited in the Agreement in order to serve the disabled population more effectively. HACB will complete its application for Capital Fund Financing Program funding to complete its obligations per the Agreement.
- Incorporate and ensure within all new development plans consistency with the goals and provisions of the Pequonnock Settlement Agreement, Father Panik Village Settlement Agreement, and Matyasovsky consent decrees.

- Comply with the Matyasovsky Consent Decree in providing fair and equal housing opportunities for disabled households, specifically for Fireside Apartments and Harborview Towers, and Scattered Site units.
- Implement the HUD-approved elderly-only and disabled-only designated housing plans in the tenant selection at the former Park City Hospital (now named, respectively, The Eleanor and The Franklin):
 - Eleanor (one bedroom)
 1. Elderly only
 2. Congregate elderly only
 - Franklin
 1. Homeless/disabled only
 2. PHA (all eligible LIPH households)
 - Merton House (two and three bedrooms)
 - Homeless/disabled family units
 - Father Panik Village Project-based vouchers
 - Applicants are selected from the Public Housing waiting list through approved landlords and HACB owned units.
 - Tenant-based Vouchers
 - Applicants are selected from LIPH waiting list for Pequonnock Replacement vouchers
- Apply for additional vouchers upon funding availability.

2. Improve community quality of life and economic vitality.

- Provide an improved living environment.

Objectives:

Implement measures to de-concentrate poverty by bringing higher income public housing households into lower income developments:

- Actively market to families between the 50-80percent of area median income.
- Improve—through modernization, maintenance, and security efforts—the physical conditions of the HACB’s sites.
- Continue to refine the comprehensive redevelopment plan for the existing Marina Village that includes the creation of a mixed-income, contextually-appropriate affordable housing development with alternative housing opportunities for public housing residents within other Bridgeport neighborhoods
- Continue “curb appeal” improvements at all sites.

Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments:

- Policies and procedures are in place for households to transfer within HACB.

- Use the GIS maps developed with the City’s planning department, as well as other visual tools, to assess the relationship of HACB properties and Section 8 program utilization within the context of census tracts and neighborhood composition.
- Conduct new demographic needs assessment to ascertain the relative incomes in HACB neighborhoods, especially as a consequence of the subprime lending crisis and economic downturn since September 2008.

Implement public housing security improvements:

- Continue to enforce “One Strike” policy.
- Enhance, supplement, and refine crime prevention efforts through wider spread applications of effective measures, including environmental designs and the installation of CCTV.
- Improve screening measures and lease enforcement.
- Continue contracting private security providers at Harborview Towers, Fireside Apartments and Trumbull Gardens.
- Work with the police department to define the problem of crime that occurs near our developments and create strategies for identifying and reducing this problem.
- Continue advocacy for residents with the Police Force to prevent unnecessary censure and citations for legitimate activities conducted in public spaces of public housing developments.

Designate developments or buildings for particular resident groups (elderly, persons with disabilities):

- Consider further designation of particular resident groups as deemed consistent with FHEO guidelines for selected developments. (The Eleanor and Franklin, formerly the Park City Hospital, were approved by HUD for designation of elderly- and disabled- veterans and all eligible one bedroom household units in January 2009.)
- Provide Project-Based Section 8 program vouchers to supportive housing developers who wish to serve priority populations, including homeless, veterans, survivors of domestic violence, refugees, etc.

Other:

- Maintain an average response time of less than 24 hours in responding to emergency work orders.
- Comply with PHAS UPCS standards.
- Improve the quality and energy efficiency of new construction and replacement housing units in order to assist in the maintenance of these units for use by the low-income population over the long-term.

- Create quality affordable units within available land parcels throughout Bridgeport that promote appropriate urban density and address transit-oriented workforce housing objectives.
- Continue to collaborate with community organizations to provide resident-driven social and behavioral supports for people with disabilities, and to implement resident self-sufficiency programs.
- Provide HACB site staff with adequate training and resources to become effective Asset Managers, that is, to deliver immediate and effective quality service to the resident communities.
- Build on established alliances and create new collaborative relationships with neighborhood groups/councils to foster joint planning and to promote interactive community relationships.
- Continue efforts to partner with City Park and Recreation Department to acquire properties on or near public housing for future development or modernization improvements.

3. Promote self-sufficiency and asset development of families and individuals.

- Promote self-sufficiency and asset development of assisted households.

Objectives:

Increase the number and percentage of employed persons in assisted families:

- Include referrals for employment and vocational training as part of Stable Families Program.
- Ensure that businesses doing work for the Authority comply with Section 3 requirements.
- Continue various resident programming.
- Provide entry level employment opportunities to residents of the Authority.
- Continue efforts to gain approval from HUD to implement a self-sufficiency program for public housing residents.
- Collaborate with social service agencies that provide training and support services for employment options.
- Support the newly-established Resident Owned Business initiative provided for under the Energy Performance Contract.

Provide or attract supportive services to improve assistance recipients' employability:

- Seek out new and maintain existing partnerships with local service providers.
- Continue presence in leadership in the Bridgeport Continuum of Care/Ten Year Plan to End Homelessness and at the Bridgeport Area Council of Church's Reentry Roundtable.
- Increase on-site community room utilization by community service providers in conjunction with site and resident needs.

Provide or attract supportive services to increase independence for the elderly or families with disabilities.

- Partner with City and other community organizations in seeking grants, donations and delivery of support systems to various families and individuals.
- Partner with Connecticut Legal Services to provide legal support/services to at-risk individuals and/or households in order to maintain their residency status with HACB.
- Satisfy ADA and Section 504 compliance requirements.
- Participate directly and indirectly in a variety of initiatives launched by the City and by local non-profit service provider agencies.

Other:

- Apply for and/or renew Family Unification Program, Resident Opportunity and Self-Sufficiency grants upon funding availability.
- Support Resident Programming, which will include leadership training, youth programs, and elderly/disabled recreational programs.
- Comply with HUD requirements and legal proceedings as it relates to the HACB Scholarship Fund as administered by the Fairfield County Community Foundation.
- Provide Project-Based Section 8 vouchers to selected SAMHSA grant recipients that are Continuum of Care providers.

4. Ensure Equal Opportunity in Housing for all Americans

- 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:

- Comply with the Voluntary Compliance Agreement with HUD.
- Comply with the Matyasovsky Consent Decree for the disabled population as it pertains to housing at Fireside Apartments and Harborview Towers.
- Train staff in the regulatory requirements.

5. Maintain a fiscally responsible and responsive public housing agency.

➤ Streamline financial management.

Objectives:

Root out inefficiencies in use of manpower and materials.
Minimize use of overtime.

Other:

- Occupy units in a timely manner to maximize income stream.
- Continue technology upgrades and increase e-commerce/procurement opportunities.
- Continue anti-fraud efforts through rigorous verification process and resident integrity monitoring.
- Improve tenant account receivables.
- Continue implementation of energy conservation measures as identified in the Energy Performance Contract.
- Implement a recycling program.
- Engage utility companies to develop a direct payment and tracking system in order to minimize negative rent conditions.
- Utilize rebate programs with utility companies when conducting on-going modernization improvements that are outside the scope of the energy performance contract.

6. Encourage coordination and innovation in the delivery of public housing.

➤ Improve coordination of activities.

Objectives:

Gain fluency in new Authority software system:

- Complete training in the new software system.
- Create management systems/forms by using the potential of the system.

Increase administrative and management efficiencies.

- Use intra-agency access to new software system to improve communications/data delivery to all staff to allow for prompt, efficient reporting within the Authority and to stakeholders, e.g., HUD, CHFA, etc.
- Upgrade hardware to keep pace with general technology improvements.
- Update HACB website regularly.
- Use CCTV system to facilitate web-based networking.

➤ Encourage innovation.

Establish partnerships to improve public housing stock and services/programs.

- Seek joint ventures and/or partnerships with the City and other housing authorities for aggregation of goods, services and commodities.

- Increase e-commerce/procurement activities when soliciting goods and services.

7. Encourage greater resident involvement in HACB planning and operations.

- Improve resident relations via the Resident Advisory Board.

Objectives:

Continue open dialogue with public housing and Section 8 residents through RAB and local site meetings, ensuring at least one Director is present at each meeting.

Assist local councils to operate efficiently and effectively and provide technical assistance to become better board members or send council members to resident training activities conducted by other housing organizations.

Encourage residents to participate in at least three (3) local council meetings and one (1) RAB meeting. Council and RAB meetings are integrated into HACB’s self-sufficiency program.

Encourage attendance of RAB and council members to the Board of Commissioner meetings.

Continue operation of after-school programs for the benefit of resident children and families at all family complexes.

Support resident programs occurring at local sites.

Support other resident initiatives that provide programs and services to the youths of HACB, including existing programs and making applications to participate in additional programs, such as Family Unification as well as other State, City, and local agency initiatives.

6.0 PHA Plan Update

6.0a. Revised Plan Elements

The following PHA Plan elements have been revised by HACB since its last Annual Plan Submission:

1. Eligibility, Selection and Admissions Policies
2. Financial Resources
3. Rent Determination
4. Operation and Management
6. Designated Housing for Elderly and Disabled Families
9. Pets

12. Asset Management

6.0b. Display Locations for HACB's Plans and Supporting Documents

HACB's Plans (including attachments) are available for public inspection at:

- HACB's main administrative office (150 Highland Avenue).
- HACB's local offices.
- Clerk's Office of the City of Bridgeport.
- Bridgeport Public Library (Broad Street).
- HACB's website (www.bridgeporthousing.org).

PHA Plan Supporting Documents are available for inspection at:

- HACB's main administrative office (150 Highland Avenue).
- City of Bridgeport's Clerk's Office.
- Bridgeport Public Library (Broad Street).
- HACB's website (www.bridgeporthousing.org).

PHA Plan Elements

1. Eligibility, Selection and Admissions Policies, including De-concentration and Wait List Procedures

Public Housing

Eligibility:

HACB verifies eligibility for admission to public housing when families are within 90 days of being offered a unit.

In addition to income checks, HACB screens for criminal or drug-related activity as well as rental history as non-income factors in establishing eligibility for admission. HACB:

- Requests criminal records from local law enforcement agencies for screening purposes.
- Requests criminal records from State law enforcement agencies for screening purposes.
- Accesses FBI criminal records from the FBI for screening purposes (either directly or through an NCIC-authorized source).

Waiting List Organization:

HACB plans to use the following methods to organize its public housing waiting list:

- Site-based waiting lists (current)
- Other
 - ⊙ Incentive transfer policy
 - ⊙ Pequonnock Apartment Court Settlement Agreement (Closed)
 - ⊙ Father Panik Village Consent Decree (Closed)

- ⊙ Matyasovszky Consent Decree (one bedroom only)
 - Disabled/Elderly waiting list
 - Disabled Transfer List
 - Elderly Transfer List
- ⊙ Park City Hospital Redevelopment
 - Homeless/Disabled Next Step definition Wait List (Franklin)
- ⊙ Congregate Elderly Wait List (Eleanor)
- ⊙ Waiting list for elderly (Transfer & New Admissions) (Eleanor)
- ⊙ Franklin Wait List one bedroom eligible family (Transfer & New Admission)
- ⊙ Merton Homes
 - Homeless/Disabled Next Step definition Wait List
 - Youth Aged Out of foster care (18-23 years old with 1 or more children)
Next Step wait list

Persons interested in public housing may apply for admission at:

- HACB's main administrative office
- HACB's development site management office
- Trumbull Gardens Administrative Office Resident Selection Department

HACB created nine newly established site-based waiting lists. The Authority currently utilizes site-based waiting lists; however:

- Pequonnock Apartments replacement units will have a site-based wait list, as per Pequonnock Apartment Settlement Agreement.(See Section 8 Administrative Plan Project Base Section 8 Vouchers)
- Matyasovsky Settlement Agreement to house disabled households in Fireside Apartments, Harborview Towers and 25 scattered site units requires HACB to have a separate site based wait list for the sites.
- HACB currently operates site-based waiting lists by bedroom size for each family development: Marina Village, PT Barnum, Charles Greene Homes, Trumbull Gardens, and Scattered Sites.

Families may be on more than one list simultaneously (two or three), depending on their particular circumstances:

- Applicants off the public housing wait list requesting Scattered Site or 1st available may be offered Pequonnock Section 8 voucher.
- Former residents of Pequonnock Apartments were given preference to occupy a scattered site unit as completed by the City of Bridgeport.(completed)
- Elderly residents who were former Pequonnock Apartments and eligible for certain benefits. (completed)
- Disabled households may concurrently be on the elderly/disabled list and on the regular wait list.
- All current applicants can be on the list of up to 3 developments or opt for first available unit.

People interested in obtaining more information about the site-based waiting lists and wishing to sign up for these waiting lists may access information and applications at:

- HACB's main administrative office.
- All HACB development management offices.
- Management offices at developments with site-based waiting lists.

Assignment:

Applicants/Transfer Residents are given two choices of vacant units concurrently and with good cause before they are removed from the waiting list,

Admissions Preferences:

HACB plans to exceed federal targeting requirements by targeting more than 40 percent of all new admissions to public housing to families at or below 30 percent of area median income.

Transfers will take precedence over new admissions when residents are:

- Emergency conditions that are documented
- Extremely overhoused (minimum two or more bedroom size).
- Extremely underhoused (minimum two or more bedroom size).
- Overhoused.
- Underhoused.
- Documenting a medical justification.
- Requested by HACB, for administrative reasons, to move (e.g., to permit modernization work).

Offers of apartments will be made in the following order:

1. Emergency transfers; 24 CFR §966.4 (h)
2. Administrative transfers in the following category order:
 - a) Category 1: Reasonable accommodations for residents with disabilities 24CFR §8.4
 - b) Category 2: Problems of a life-threatening nature
 - c) Category 3: Three sub priorities below:
 - Modernization Transfer;
 - Revitalization transfers
 - Serious overcrowding, over-housing, and split families
3. Incentive transfers;
4. New Admissions from the waiting list;

HACB has established preferences for admission to public housing (other than date and time of application). HACB plans to adopt the following admission preferences in the next three (3) years:

Former Federal preferences:

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition).
- Victims of domestic violence.

Other preferences:

- Working families and those unable to work because of age or disability.
- Veterans
- Residents who live and/or work in the jurisdiction.
- Compliance with consent decrees:
 - ⊙ Pequonnock Apartment Settlement Agreement – former residents of may return to public housing (completed)
 - ⊙ Matyasovsky Consent Decree – disabled applicants will have preference over elderly applicants for Fireside Apartments and Harborview Towers until the sites reach a specific ratio
 - ⊙ Reentry Program
 - ⊙ Homeless
 - ⊙ Lease in Place (applicants for FPV replacement housing will be leased in place in existing properties acquired, with HUD’s previous approval, as public housing, provided that such applicants meet minimum eligibility for HACB public housing)

HACB will employ admissions preferences according to the following priorities:

- Date and Time
- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Working families and those unable to work because of age or disability
- Veterans
- Residents who live and/or work in the jurisdiction
- Lease in place
- Compliance with consent decrees:
and Matyasovsky Consent Decree

These preferences are not applicable to income targeting requirements; the pool of applicant families ensures that HACB will meet its income targeting requirements.

Occupancy:

Applicants and residents have access to the following sources of information about the rules of occupancy in public housing:

- The HACB resident lease.
- HACB’s Admissions and Continued Occupancy Policy.
- HACB briefing seminars or written materials.
- Other sources include:
 - ⊙ HACB’s website

- ⊙ City Clerk's office
- ⊙ Bridgeport Public Library
- ⊙ HACB web site (www.bridgeporthousing.org)

Residents notify HACB of changes in family composition at various junctures:

- At an annual reexamination and lease renewal.
- Any time family composition changes.
- At family request for revision.
- Other:
 - ⊙ As per Flat Rent guidelines.

De-concentration and Income Mixing:

HACB's analysis of its family (general occupancy) developments to determine concentrations of poverty indicates the need for measures to promote de-concentration of poverty or income mixing. Consequently, HACB adopted changes to its admissions policies based on the results on the required analysis, which led to the following:

- Adoption of site-based waiting lists for:
 - ⊙ Marina Village
 - ⊙ PT Barnum
 - ⊙ Charles Greene Homes
 - ⊙ Trumbull Gardens
 - ⊙ Scattered Sites
 - ⊙ The Eleanor and The Franklin (former Park City Hospital)
- Employing new admission preferences at targeted developments
Listed below:
 - ⊙ Marina Village
 - ⊙ PT Barnum
 - ⊙ Charles Greene Homes
 - ⊙ Trumbull Gardens
 - ⊙ Scattered Sites

HACB did not adopt any changes to other policies based on the results of the require analysis of the need for de-concentration of poverty and income mixing.

Based on the results of the required analysis, HACB will make special efforts to attract or retain higher income families at the following developments:

- ⊙ Marina Village
- ⊙ PT Barnum
- ⊙ Charles Greene Homes
- ⊙ Trumbull Gardens
- ⊙ Scattered Sites

Based on the results of the required analysis, HACB will not make special efforts to assure access for lower income families.

Section 8

Eligibility:

HACB screens applicants for:

- Criminal and drug-related activity, more extensively than required by law or regulation
- Income Requirements
- Rental History

HACB requests criminal records from local law enforcement agencies for screening purposes.

HACB requests criminal records from State law enforcement agencies for screening purposes.

HACB accesses FBI criminal records from the FBI for screening purposes.

HACB shares the following kinds of information with prospective landlords:

- Criminal or drug-related activity.
- Other (describe below)
 - ⊙ HACB will furnish upon request by prospective Section 8 landlords with information about a family's rental history, compliance with essential conditions of tenancy, current address of prospective tenant, and name and address of current and/or previous landlord, or any history of drug trafficking.

Waiting List Organization:

The Section 8 tenant-based assistance waiting list is merged with the federal public housing, moderate rehabilitation, project-base certificate programs, or other federal or local program.

Interested persons may apply for admission to Section 8 tenant-based assistance when and as specified by HACB in public advertisements.

Search Time:

HACB gives extensions on standard 60-day period to search for a unit in the following circumstances:

- Vouchers are initially issued for sixty (60) days).
- Extensions are permissible at the discretion of the Authority at 30-day intervals up to a maximum of sixty (60) days primarily for these reasons:
 - ⊙ Extenuating circumstances, such as hospitalization or a family emergency for an extended period of time that has affected the family's ability to find a unit within the initial sixty-day period.

- ⊙ The Authority is satisfied that the family has made a reasonable effort to locate a unit, including seeking the assistance of the Authority, through the initial sixty-day period.
- ⊙ The family was prevented from finding a unit due to disability accessibility requirements or large size bedroom unit requirement.
- ⊙ Per the Pequonnock Apartments Settlement Agreement, for eligible Pequonnock Apartment residents (180 days, subject to 60 day extensions for good cause).

Admissions Preferences:

HACB has established preferences for admission to Section 8 tenant-based assistance.

HACB plans to employ the following admission preferences in the coming year:

- Working families and those unable to work because of age or disability.
- Veterans and veterans’ families.
- Victims of domestic violence.
- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition).
- Residents who live and/or work in HACB’s jurisdiction.
- Other preferences:
 - ⊙ HACB will comply with Pequonnock Apartment Settlement Agreement and subsequent revisions.
 - ⊙ HACB will comply with Father Panik Village Settlement Agreement and subsequent revisions.
 - ⊙ HACB will comply with the Matyasovsky consent decree.

HACB will employ admissions preferences, indicating priority by marking a “1” in the space that represents its first priority, a “2” in the box representing its second priority, etc., as follows:

Date and Time:

Former Federal preferences

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence

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

Other preferences:

- HACB will comply with Pequonnock Apartment Settlement Agreement and subsequent revisions.
- HACB will comply with Father Panik Village Settlement Agreement and subsequent revisions.

- Matyasovsky consent decree.

Among applicants on the waiting list with equal preference status, date and time of application will determine order of application.

HACB plans to employ preferences for “residents who live and/or work in the jurisdiction,” provided this preference has previously been reviewed and approved by HUD.

NB: Given the pool of applicant families, HACB’s planned preferences will not interfere with HACB’s income to income targeting requirements.

Special Purpose Section 8 Assistance Programs:

Policies governing eligibility, selection, and admissions to any special-purpose Section 8 program administered by HACB are contained in HACB’s Annual and Five Year Plan:

- Section 8 Administrative Plan.
- Briefing sessions and written materials.
- Other:
 - ⊙ Pequonnock Apartment Settlement Agreement and subsequent amendment.
 - ⊙ Father Panik Village Settlement Agreement and subsequent amendment.
 - ⊙ Section 8 Voucher Homeownership Program upon funding availability.

HACB will announce the availability of any special-purpose Section 8 programs to the public through:

- Published notices.
- Other:
 - ⊙ Pequonnock Apartment Settlement Agreement and subsequent amendment.

2. Statement of Financial Resources

Following is a list of financial resources that are anticipated to be available to HACB for the support of Federal public housing and tenant-based Section 8 assistance programs administered by HACB 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, the use for those funds is indicated as one of the following categories: public housing operations, public housing capital improvements, public housing safety/security, public housing supportive services, and Section 8 tenant-based assistance and Section 8 support services.

FY 2012 Financial Resources

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2011 grants)		
a) Public Housing Operating Fund	\$12,901,916	
b) Public Housing Capital Fund	\$ 3,061,787	
c) HOPE VI Revitalization	\$0	
d) HOPE VI Demolition	\$0	
e) Annual Contributions for Section 8 Tenant-Based Assistance	\$27,404,568	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)	\$0	
g) Resident Opportunity and Self-Sufficiency Grants	\$467,388/3 yrs	Computer training specialist, Job Developer, Job pre-employment program
h) Community Development Block Grant	\$0	
i) HOME	\$0	
Other Federal Grants (list below)		
2. Prior Year Federal Grants (unobligated funds only) (list below) CFP10	394,753	
3. Public Housing Dwelling Rental Income	\$6,151,125	Public housing operations, tenant services
4. Other income (list below)		
Operations*	\$ 168,299	Operations
Funding for replacement units	\$ 1,405.00	Replacement Housing Factor
5. Non-federal sources (list below)		
Total resources	\$50,551,241	

Funding represents lease agreements with the City of Bridgeport, Action for Bridgeport Community Development, Southwest Community Health Center and Cedar Shopping Center.

3. Rent Determination

Public Housing

Income Based Rent Policies:

- HACB employs discretionary policies for determining income-based rent, assuming a minimum rent of \$50.
- HACB has adopted discretionary minimum rent hardship exemption policies, as indicated below:
 - ⊙ The family has lost eligibility for or is awaiting eligibility determination for a Federal, State or local assistance program, including a family that includes a member who is an alien lawfully admitted for permanent resident under the Immigration and Nationality Act who would be entitled to public benefits by

for Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996.

- ⊙ The family would be evicted as a result of the imposition of the minimum rent.
- ⊙ The income of the family has decreased because of changed circumstance, including the loss of employment, death in the family or other circumstances as determined by HACB or HUD.

HACB plans to charge rents at a percentage less than 30 percent of adjusted income:

- ⊙ Residents may choose flat rent rates. Minimum rates, as indicated above, are set at \$50.

HACB uses the following discretionary (optional) deductions and/or exclusions policies:

- For the earned income of a previously unemployed household member.
- For increases in earned income.

Ceiling rents:

HACB does not establish ceiling rents.

Rent Re-determinations:

Between income reexaminations, tenants report changes in income or family composition to HACB at the following junctures

- Any time the family experiences an income increase.
- Within ten calendar days of all changes in family composition or status.

HACB does not plan in the next year 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.

Flat Rents:

The market-based flat rents are shown below. HACB used the following method to determine these flat rents:

- HACB adopted flat rents based on a reduced rate of the Fair Market Rent for units comparable in size, location, quality, unit type, age, housing services, maintenance, utilities and amenities in the area in which each public housing development is located. HACB will apply flat rents to its inventory-wide public housing stock. HACB used the Section 8 Annual Rent Reasonableness Study to establish the Fair Market Rents.

HACB will adjust its market-based flat rents this fiscal year initially in conformance with Fair Market Rents and subsequently using a review of market comparables. To establish comparability, HACB may use the Section 8 rent reasonableness study of comparable housing, rent surveys of similar assisted units in the neighborhood, and/or other reasonable methods to determine the flat rent for a unit.

PEQUONNOCK SECTION/LOWER WOOD AREA

Charles Greene Homes, Catherine Street, Calhoun Street, Harral Avenue, Highland Avenue, Madison Avenue, Pequonnock Towers, Sedgewick Avenue

Unit Type	Flat Rent
Efficiency/Studio	\$413.00
One (1) Bedroom	\$525.00
Two (2) Bedroom	\$638.00
Three (3) Bedroom	\$731.00
Four (4) Bedroom	\$825.00
Five (5) + Bedroom	\$949.00

SOUTH END/WEST END AREA

Marina Village, P.T. Barnum, and Pequonnock Apartments, Atlantic Avenue, Center Street, Charles Street, Elmwood Avenue, Grove Street, Iranistan Avenue, Norman Court, Park Avenue, West Liberty, and Wood Avenue, Poplar Street, Carleton Avenue

Unit Type	Flat Rent
Efficiency/Studio	\$413.00
One (1) Bedroom	\$525.00
Two (2) Bedroom	\$638.00
Three (3) Bedroom	\$713.00
Four (4) Bedroom	\$825.00
Five (5) + Bedroom	\$949.00

UPPER EAST SIDE/MILL HILL AVENUE AREA

Asylum Street, Bond Street, Boston Commons, Concord Street, Grant Street, Kings Bury Road, Kossuth Street, North Bishop Avenue, North Ridgefield Avenue, Ogden Street EXT, Pixlee Street, Prince Street, Priscilla Street, Sheridan Street, Stillman Street, Summerfield Avenue, Tudor Hill, Velvet Street

Unit Type	Flat Rent
Efficiency/Studio	\$450.00
One (1) Bedroom	\$563.50
Two (2) Bedroom	\$683.00
Three (3) Bedroom	\$750.00
Four (4) Bedroom	\$874.00
Five (5) + Bedroom	\$1005.00

LOWER EAST SIDE/EAST END AREA

Fireside Apartments and Harborview Towers, Beardsley Street, Cowles Street, Dekalb Avenue, Hewitt Street, Newfield Avenue, Sixth Street, Williston Street, Caroline Street, Cedar Street, East Main Street, Hallett Street, Marlboro Court, Nichols Street, Steuban Street, Water view Avenue, Pembroke II

Unit Type	Flat Rent
Efficiency/Studio	\$413.00
One (1) Bedroom	\$525.00
Two (2) Bedroom	\$638.00
Three (3) Bedroom	\$713.00
Four (4) Bedroom	\$825.00
Five (5) + Bedroom	\$949.00

RESERVOIR AREA

Trumbull Avenue, Alba Avenue, Alexander Avenue, Ezra Street, Garden Drive, Hawley Avenue, Houston Avenue, Lindley Street, Parrot Street, Salem Street, Sound view Avenue, Sunshine Circle, Yaremich Drive

Unit Type	Flat Rent
Efficiency/Studio	\$488.00
One (1) Bedroom	\$600.00
Two (2) Bedroom	\$728.00
Three (3) Bedroom	\$806.00
Four (4) Bedroom	\$926.00
Five (5) + Bedroom	\$1065.00

NORTH END AREA

Clark Street, Woodside Avenue

Unit Type	Flat Rent
Efficiency/Studio	\$488.00
One (1) Bedroom	\$600.00
Two (2) Bedroom	\$728.00
Three (3) Bedroom	\$806.00
Four (4) Bedroom	\$926.00
Five (5) + Bedroom	\$1065.00

LOWER NORTH END AREA

Unit Type	Flat Rent
Efficiency/Studio	\$450.00
One (1) Bedroom	\$563.00
Two (2) Bedroom	\$683.00
Three (3) Bedroom	\$750.00
Four (4) Bedroom	\$874.00
Five (5) + Bedroom	\$1005.00

BLACK ROCK AREA

Belmont Avenue, Harbor Avenue, Scofield Avenue

Unit Type	Flat Rent
Efficiency/Studio	\$488.00
One (1) Bedroom	\$600.00
Two (2) Bedroom	\$728.00
Three (3) Bedroom	\$806.00
Four (4) Bedroom	\$926.00
Five (5) Bedroom	\$1065.00

Section 8 Tenant-Based Assistance

Payment Standards:

HACB’s payment standard is at or about 90 percent but below 100 percent FMR, but above 100 percent only for HUD approved Section 8 Vouchers as per Pequonnock Apartment Settlement Agreement.

Payment standards are reevaluated for adequacy annually, and consider the following factors in its assessment of adequacy:

- Success rates of assisted families.
- Rent burdens of assisted families.

Minimum Rent:

HACB’s minimum rent ranges from \$26-50.

HACB has adopted the following discretionary minimum rent hardship exemption policies:

- Lost eligibility while waiting for a determination for Federal, state or local assistance programs.
- Facing an eviction because of this hardship.
- Income decrease because of changed circumstance (e.g., unemployment).
- Death in the family and other circumstances determined by HACB or HUD.

4. Operations and Management

PHA Management Structure

A brief description of the management structure and organization of HACB follows:

HUD Programs Under PHA Management:

Following is a list of Federal programs administered by HACB, indicating the number of families served at the beginning of the upcoming fiscal year and the expected turnover in each.

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	2524	320
Section 8 Vouchers	2551	3%
Section 8 Certificates		
Section 8 Mod Rehab		
Special Purpose Section 8 Certificates/Vouchers (list individually)	183	0
Public Housing Drug Elimination Program (PHDEP)	0	
Other Federal Programs(list individually)		

Deconcentration and Income Mixing

Does the PHA have any general occupancy (family) public housing developments covered by the deconcentration rule. If no, this section is complete. If yes, continue to the next section

YES

Do any of these covered developments average incomes above or below 85% - 115% of the average incomes of all such developments. If no, this section is complete. If yes, list these developments as follows:

YES

Development Name	Number of Units	Adjusted Avg	Explanation	Deconcentration Policy
Marina Village	406	\$10,760	24CFR903.2 c 1 iv b	
Charles Greene	270	\$8,537	24CFR903.2 c 1 iv d	
Fireside	272	\$15,699	24CFR903.2 c 1 iv a	
Scattered sites 1	231	\$17,983	24CFR903.2 c 1 iv c	
Scattered sites 2	301	\$16,876	24CFR903.2 c 1 iv c	
Yaremich	12	\$31,270	24CFR903.2 c 1 iv c	

Management and Maintenance Policies:

Following is a list of HACB's public housing management and maintenance policy documents, manuals, and handbooks that contain the agency's rules, standards, and policies, including a description of pest prevention and eradication measures and the policies governs Section 8 management:

- Public Housing Maintenance and Management:
 - ⊙ Affirmative Marketing Policy, Statement of Procedures and Fair Housing Procedures
 - ⊙ Capitalization Policy & Investment Policy
 - ⊙ Procurement Policy
 - ⊙ Admissions and Continued Occupancy Policy, Resident Lease, Rent Collection Policy, Pet Policy, Emergency and Work Order Policy, Grievance Procedures
 - ⊙ Extermination Plan for each development
- Section 8 Management: (list below)
 - ⊙ Section 8 Administration Plan
 - ⊙ Section 32 homeownership plan
 - ⊙ Section 8 Voucher Homeownership Program

5. PHA Grievance Procedures

Public Housing

HACB has not established any written grievance procedure that makes additions to the requirements found at 24 CFR Part 966, Subpart B, for residents of public housing.

Residents or applicants to public housing who wish to initiate HACB's grievance process may apply at:

- HACB's main administrative office.
- HACB's development management offices.
- Other:
 - ⊙ Office of the Director of Asset Management at Gary Crooks Center, 301 Bostwick Avenue, Bridgeport, CT 06604.

Section 8 Tenant-Based Assistance

HACB has 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.

Applicants or assisted families who wish to initiate the informal review and informal hearing processes may apply at:

- PHA main administrative office.
- The Office of the Director of Section 8 at 150 Highland Avenue, Bridgeport, CT.

6. Community Service and Self-Sufficiency

HACB Coordination with the Welfare (TANF) Agency

HACB in preparation for entering into a cooperative agreement with the TANF Agency is conducting a comprehensive study of Zero Rent Payers. This will equip HACB to make appropriate outreach for cohorts of residents who fall into this category. Ultimately, HACB will share information and/or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937).

Coordination efforts between HACB and the TANF agency will be identified through:

- 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

Services and programs offered to residents and participants

Self-Sufficiency Policies:

The following discretionary policies will be employed by HACB to enhance the economic and social self-sufficiency of assisted families:

- Public housing rent determination policies.
- Public housing admissions policies.
- Section 8 admissions policies.
- Preference/eligibility for public housing homeownership option participation.
- Preference/eligibility for section 8 homeownership option participation.

Economic and Social Self-sufficiency Programs:

HACB coordinates, promotes or provides several programs to enhance the economic and social self-sufficiency of residents:

Services and Programs				
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)
<i>Computer Learning Center</i>	<i>5,000</i>	<i>Random</i>	<i>Trumbull Gardens and PT Barnum</i>	<i>Public Housing</i>
<i>Resident Service Coordinator for elderly and disabled households</i>	<i>1500</i>	<i>Random</i>	<i>Resident Services Department</i>	<i>Public Housing</i>
<i>Scholarship Program</i>	<i>4</i>	<i>Random</i>	<i>Resident Services</i>	<i>Public Housing</i>

				<i>and Section 8</i>
<i>Homeownership*</i>	<i>Varies</i>	<i>Random</i>	<i>Resident Selection</i>	<i>Public Housing and Section 8</i>
<i>Job Developer</i>	<i>2410</i>	<i>Random</i>	<i>Resident Services</i>	<i>Public Housing and Section 8</i>
<i>After-School Programs</i>	<i>309</i>	<i>Random</i>	<i>Trumbull Gardens, Marina Village, PT Barnum</i>	<i>Public Housing and Section 8</i>
<i>Summer Sensational Camp</i>	<i>100</i>	<i>Random</i>	<i>Trumbull Gardens</i>	<i>Public Housing Residents</i>
<i>Renter's Rebate Program</i>	<i>600</i>	<i>Elderly/Disabled</i>	<i>Site Offices</i>	<i>Public Housing</i>
<i>Resident Association Leadership Training</i>	<i>12</i>	<i>Resident Association Officers</i>	<i>Resident Associations/Site Offices</i>	<i>Public Housing</i>
<i>Financial Literacy</i>	<i>25</i>	<i>Random</i>	<i>Gary Crooks Center and area agencies</i>	<i>Public Housing/Section 8</i>
<i>City-wide Youth Center</i>	<i>260</i>	<i>Random</i>	<i>Trumbull Gardens</i>	<i>Public Housing/Section 8</i>

**HACB doesn't have an approved program at this time, although will consider developing a program for approval is demonstrated by resident demand.*

Family Self-sufficiency program Participation Description

Family Self Sufficiency (FSS) Participation		
Program	Required Number of Participants (start of FY 2008 Estimate)	Actual Number of Participants (As of: DD/MM/YY)
Public Housing	N/A	0
Section 8	33	33 as of July 15, 2010

Welfare Benefit Reductions

HACB 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:

- 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.
- Maintaining a protocol for exchange of information with all appropriate TANF agencies.

Community Service Requirement (pursuant to Section 12c of the U.S. Housing Act of 1937)

The Authority will operate within the following guidelines:

All adult (nonexempt) residents of public housing are encouraged to participate on an average of 8 hours per month of community service or participate in an economic self-sufficiency program for 8 hours per month or a combination of each activity for a total average of 8 hours a month or a total of 96 hours per year.

The Authority exempts adult residents who are elderly, blind or disabled preventing them from participating, a primary caretaker of such an individual, exempt from work by the State, receiving assistance and in compliance with State or TANF requirements, or is gainfully employed. The adult resident is exempt if they are already participating in community service and/or self-sufficiency activities as defined below.

Work activities include unsubsidized or subsidized employment, work experience if sufficient private sector employment is not available, on-the-job training, job search or job readiness assistance, community service programs, vocational educational training (not to exceed 12 months for any individual), and/or job skills training directly related to employment.

1. COMMUNITY SERVICE ACTIVITIES

The Authority will give residents the greatest amount of community service activities possible for participation. The Authority will inform residents of volunteer opportunities in the PHA and community annually, during any changes in the household, and during admissions. Community service activities can include, but not limited to, physical improvement of the community, volunteer work in schools, child-care centers, hospitals, homeless shelters, or other social service organizations and local agencies

Political activity cannot be considered community service. The Authority will not replace HACB employees with community service residents.

2. SELF-SUFFICIENCY ACTIVITIES

The self-sufficiency program is defined as any program designed to encourage, develop, assist, train, or facilitate economic independence or to provide work for our public housing residents. These activities may include job training, employment counseling, work placement, basic skills training, education, English proficiency, workfare, financial or household management, apprenticeship, and any program necessary to ready a participant to work (such as substance abuse or mental health counseling and treatment).

3. LEASE REQUIREMENTS

HACB reserves the right to not renew the household's lease should they fail to comply with the community service requirement. Failure to complete the 96 hours per year will carry over to the following year. Households must enter into an agreement to complete

them. Should the household continue to fail the requirement; the Authority will exercise its right not to renew the household's lease. Further non-compliance (i.e. one adult member not meeting requirement, two years of non-participation) may result in eviction.

4. ADMINISTRATION OF PROGRAM AND REQUIREMENTS

The Department of Social Services (DSS) has partnered with the Authority to provide information regarding eligibility of public housing residents receiving assistance. DSS will verify the number of people on public assistance and also provide the number of months they have remaining on their eligibility.

The Authority will initially identify residents paying minimum rent. The Community Affairs Department will provide an assessment to determine exemption or non-exemption. The Counselor will then develop a plan of action identifying their needs and course of action to comply with the requirements should they be identified as non-exempt.

Subsequently, the Authority will continue to identify non-exempt residents annually during their re-certification, intermittently as households' request changes, during new admissions, and/or as identified by DSS as non-exempt. The Authority reserves the right to change exemption status during the year should they become exempt or non-exempt.

The Authority will provide residents with a Community Service Verification Form that should be completed wherever they perform community service. The Authority will identify a point person from that organization as the sole verifier. That person's signature must be on the form. The resident must turn in their verification forms monthly to the Clerk Typist or the Site Manager. The Verification Forms will remain in the residents' file.

5. NOTIFICATION PROCESS

All new residents, during admissions, will be informed of this requirement. Their status will be determined annually during their re-certification and during any changes in the household.

Current residents will be notified annually by, but not limited to, mail, flyers, resident association meetings, monthly and quarterly mailers, and public meetings.

The Authority will periodically inform all social service agencies, churches, and local board of education of the service requirements and to identify point persons for verifications. All organizations providing the community service activity must comply with the Authority's non-discrimination policy.

7. Safety and Crime Prevention

Measures to Ensure the Safety of Public Housing Residents

Described in the following list are needs for measures to ensure the safety of public housing residents:

- 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.

HACB use the following information or data to determine the need to improve safety of residents:

- Safety and security survey of residents.
- Analysis of crime statistics over time for crimes committed “in and around” public housing authority.
- Resident reports.
- HACB’s employee reports.
- Police reports.
- Demonstrable, quantifiable success with previous or ongoing anticrime/anti drug programs.

The most affected among HACB’s developments are Marina Village, PT Barnum, Trumbull Gardens, Charles Greene, Harborview Towers, Fireside Apartments and the scattered sites.

Crime and Drug Prevention Activities Undertaken or Planned in the Next Fiscal Year

Following is a list of the crime prevention activities HACB has undertaken or plans to undertake:

- 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:
 - ⊙ Continuation of the unarmed security patrols in HACB developments.
 - ⊙ Continued income mixing.
 - ⊙ Providing homeownership opportunities.
 - ⊙ Planned revitalization of Marina Village.
 - ⊙ Installation of security cameras and security lighting at Marina Village, Charles Greene Homes, Trumbull Gardens, Harborview Towers, and PT Barnum Apartments.

- ⊙ Assisting residents to obtain a skill, trade or higher education through the Authority's scholarship program and job development programs through the ROSS grant.
- ⊙ Narcotic Hotline #576-7983 and Gang Hotline #334-4264. Identification of all callers is not required and shall remain private should the caller identify themselves.

The developments most affected are Marina Village, PT Barnum, Trumbull Gardens, Charles Greene, Harborview Towers, Fireside Apartments and the scattered sites.

Coordination between HACB and the Police

Coordination efforts made between HACB and the appropriate police precincts for carrying out crime prevention measures and activities are listed below:

- 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 regularly testify in and otherwise support eviction cases
- Police regularly meet with the PHA management and residents

The developments most affected are Marina Village, PT Barnum, Trumbull Gardens, Charles Greene, Harborview Towers, Fireside Apartments and the scattered sites.

8. Pets

HACB's policy—originally developed after weighing and balancing the interests of Housing Authority's residents, management, and the communities surrounding HACB developments—permits, in accordance with Federal regulations, pet(s) in specified dwelling sites:

- No exotic, wild or dangerous animals, snakes, farm animals to include chickens and roosters or any other animal not permitted in residential units by state or local laws, ordinances or this policy may be kept by residents.
- Public housing residents living in determined sites are permitted to keep no more than one dog or one cat per unit. The site restrictions do not apply to service animals that assist persons with disabilities, or service animals that accompany visitors to the developments, or elderly residents requiring the companionship of an animal.

Currently, additional fees and restrictions apply, which is outlined in the Admissions and Continued Occupancy Policy. The document is available for review to the public. (As part of the comprehensive review of HACB's resident lease, the pet policy is being further scrutinized and fine tuned.)

9. Civil Rights Certifications

Civil rights certifications are included in HACB's Plan Certifications of Compliance with the PHA Plans and Related Regulations, and are consistent with the jurisdictional guidelines set forth in the Consolidated Plan of the City of Bridgeport.

HACB has taken the following steps to ensure consistency of this Plan with the Consolidated Plan for the jurisdiction:

- 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.
- The Authority is participating in the Asset Control Area Participation Program.

10. Fiscal Audit

HACB is 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)). The most recent fiscal audit (2011) was submitted to HUD.

11. PHA Asset Management

HACB plans to engage in the following types of asset management activities in the Plan Year:

- Private management for select scattered sites.
- Development-based accounting.
- Other:
 - ⊙ Physical Needs Assessment updates.
 - ⊙ Energy Audit and Performance Contract improvements.

12. Violence Against Women Act (VAWA)

HACB continues to work with Connecticut Legal Services and other local organizations (Center for Women and Families and Emerge, as well as member agencies of the Greater Bridgeport Area Continuum of Care) to develop policies and procedures for both the public housing and Section 8 programs that HACB will then implement and monitor. We will comply with the requirement of the Act as prescribed in the Federal Register, Volume 72, No. 51, March 16, 2007. Upon completion of the policies and procedures, they will be incorporated into the Admissions and Occupancy Plan and into the Section 8 Administrative Plan.

We continue to work with other local housing authorities to develop an inter-agency/regional policy and protocol to provide protections and opportunities for victims of domestic violence. A Memorandum of Agreement between the Housing Authority of New Haven and HACB established an Inter-Jurisdictional policy and protocol for the relocation of resident in the event that such resident is the victim of domestic violence, dating violence or stalking.

In the meantime, referrals are made to the Center for Women and Families and any admissions or transfer requests are addressed on a case-by-case basis.

7.0 Hope VI/Choice Neighborhood Initiative, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-Based Vouchers

7.0a. Hope VI/Choice Neighborhood Initiative

HACB has neither applied for nor received a HOPE VI/Choice Neighborhood revitalization grant. However, HACB plans to apply for Choice Neighborhoods grants as soon as the upcoming year to address either the Marina Village or the former Marina Apartments/Pequonnock sites.

Mixed Finance Modernization or Development

HACB will be engaging in mixed-finance development activities for public housing within the Plan year. Currently, HACB has created and implemented plans to complete several identified developments in satisfaction of the Father Panik Village Replacement Agreement, including Albion Street and a smaller replacement housing project on a yet to be identified site.

In addition, HACB will be conducting other public housing development and/or replacement activities. For example:

- The City of Bridgeport is concluding replacement housing activities to comply with the Pequonnock Apartment Settlement Agreement.
- Possible purchase and rehabilitation of properties in the West Side, East End, and Hollow neighborhoods.
- Construction of 14 townhouse and garden units at Yaremich II.

7.0B. Demolition and Disposition

HACB plans to conduct 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.

Demolition/Disposition Activity Description
1a. Development name: Marina Village 1b. Development (project) number: CT26-P001-002
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: First application July 2012 others to follow.
5. Number of units affected: to be confirmed during discussion with community and residents, but remaining units not rehabilitated will be affected by this activity.
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Antinozzi and Associates were procured October, 2011 to provide oversight of the visual limited mold assessment. b. Relocation Consultant procured c. Monthly meetings are held with the City of Bridgeport with regards to this project. d. Diversified Technology Consultants was hired to provide technical information in preparation of the Demolition Application to the SAC. e. Anticipated Demolition Application for buildings 26,27, 34, 7 to SAC, October 2012.

Demolition/Disposition Activity Description
1a. Development name: Wayne Street 1b. Development (project) number: CT26-P001-040
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: <u>(July 2005 approved for demolition; planned submission for disposition by October 2008)</u>
5. Number of units affected: None
6. Coverage of action (select one)

<input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<p>7. Timeline for activity: The building on site was approved for demolition in July 2005. As part of our requirement to replace housing under the Father Panik Village replacement program and the Pequonnock Apartment Settlement Agreement, the Authority reserves the option to dispose of the property for the benefit of either agreement. HACB environmental certification was approved by the Harford Field Office on 6/19/2012. HACB is working with Connecticut Legal Services and the City of Bridgeport to determine the viability of exchanging this property, with a satisfactory building lot or equivalent housing. Negotiations are ongoing but moving forward, with the expectation that we could have a mutual agreement among the parties named above to allow an Application to HUD by August 2012.</p>

Demolition/Disposition Activity Description
<p>1a. Development name: Former Father Panik Village, Pembroke III, 70 Church St., 271 Hallett St., 540 Crescent Street 1b. Development (project) number: CT26-P001-001 (original) CT26-P001-053 (development budget used)</p>
<p>2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/></p>
<p>3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/></p>
<p>4. Date application approved, submitted, or planned for submission: <u>May, 2013</u></p>
<p>5. Number of units affected: Parcel is vacant</p>
<p>6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development approximately 2 parcels</p>
<p>7. Timeline for activity: a. Request for Proposal was released on May 23, 2012 seeking proposals from architectural firms to produce conceptual designs for the redevelopment of a portion of the former Father Panik Village site. b. Applications were reviewed/scored by staff. Finalist met with staff June 20, 2012 c. Contract awarded September 2012</p>

Demolition/Disposition Activity Description
<p>1a. Development name: Marina Apartments Lot 1b. Development (project) number: CT26-P001-002b</p>
<p>2. Activity type: Demolition <input type="checkbox"/></p>

Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: <u>January 2013</u>
5. Number of units affected: Parcel is vacant
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development approximately 5 acres
7. Timeline for activity: As part of a comprehensive revitalization plan for the Marina Apartments, Pequonnock Apartments lot and adjacent properties owned by the City with a preferred developer, HACB anticipates a planned disposition application in January 2013. This lot may be considered for development as part of the Marina Village replacement/Choice Neighborhoods application. Timeline for activity: a. Actual or projected start date of activity: October 2012 plan will begin with identification of roster IQC consultant and the hiring of a Senior Project Manager in development to be tasked with creating a Master Development Plan for Marina Village and replacement housing, potentially as part of a Choice Neighborhood application. b. Submission of Master Development Plan to HUD for review and approval, which may include demolition activities in March 2013. c. Demolition and other building to begin as early as August 2013 with a projected end date of activity in 2018.

Demolition/Disposition Activity Description
1a. Development name: Marina Village 1b. Development (project) number: CT26-P001-002a
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date application approved, submitted, or planned for submission: <u>October 5, 2006</u>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development, for easement with CT Light and Power <input type="checkbox"/> Total development
7. Timeline for activity: Ongoing

Demolition/Disposition Activity Description
1a. Development name: Father Panik Village Acquired Units for Replacement Housing: 26 Adams St., 244-246 Olive St., 331 Alba Ave. #Rear, 319, 325, 329 Woodlawn Ave., 65-69 Highland Ave., 191-197 and 323 Herral Avenue, 1081-1083 Iranistan Ave., 147-153 and 157-163 Lee Ave., and 177 Voight Ave, 147-151 Highland Ave., 59 Sedgwick Ave., 73-127 Garden St., 1b. Development (project) number: CT26-P001-053
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: <u>(planned application December 2012)</u>
5. Number of units affected: properties are vacant
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Submission of application: December 2011 b. HUD review and approval: February 2012 c. Transaction completion: April 2012

Demolition/Disposition Activity Description
1a. Development name: Various occupied single family scattered site properties 1b. Development (project) number: CT26-P001-to be determined
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: December 2013
5. Number of units affected: 32 occupied units
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: HACB is reviewing its entire public housing inventory to determine the most appropriate housing to remain within our portfolio. Upon completion of this review, certain public housing properties most appropriate for creating additional housing will be disposed of under the Section while those most

appropriate for homeownership opportunities will be identified under the homeownership section.

Demolition/Disposition Activity Description
1a. Development name: 361 Bird Street, Central Warehouse 1b. Development (project) number: CT26-P001-005
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> Long term lease
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: December 2012
5. Number of units affected: 0 units 6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: HACB is reviewing its inventory to determine the most appropriate use of office facilities based on existing and future office needs. Upon determination of the best of the site, the HACB may dispose of the property.

Demolition/Disposition Activity Description
1a. Development name: Church Street (Beth's House) 1b. Development (project) number: TBD
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: December 2010
5. Number of units affected: 0 units 6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: HACB is negotiating the potential to purchase Sts. Cyril and Methodius convent on Church Street (contiguous to Fr. Panik Village property) from the Catholic Diocese of Fairfield County. The Diocese is also negotiating the potential to purchase of HACB land underlying the Church of Sts. Cyril and Methodius parking lot. Upon contract with the Diocese, HACB will make

application to HUD for approval of the purchase and the disposition of the parking lot property.

Designation of Public Housing Activity Description
1a. Development name: 361 Bird Street 1b. Development (project) number: TBD
2. Designation type: Section 202 Supportive Housing for the Elderly Program
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: <u>(June 2013)</u>
5. Number of units affected: to be confirmed during discussion with community and residents. – to be determined
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: a. RFP for Turnkey Development - September, 2013 b. Selection of Developer - November, 2013 c. Construction begins – January, 2014 d. Available for occupancy – January 2015

Designation of Public Housing Activity Description
1a. Development name: Homes for the Hollow 1b. Development (project) number: CT26-P001-to be determined
2. Activity type: To develop four vacant lots into 7 workforce housing units.
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application <input type="checkbox"/>
5. Application was submitted to the State of Connecticut Department of Economic and Community Development – April 13, 2012
5. Number of units affected:
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: a. Submission of application: April 13, 2012 b. Notification from DECD: August 2012

c. RFQ will be issued upon notification of grant funding

Designation of Public Housing Activity Description
1a. Development name: Pembroke Green
1b. Development (project) number: to be determine
2. Designation type: Occupancy by only the elderly <input type="checkbox"/> Occupancy by families <input checked="" 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 checked="" type="checkbox"/>
4. Date this designation approved, submitted, or planned for submission: TBD
5. If approved, will this designation constitute a (select one) <input checked="" type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 21
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development

Designation of Public Housing Activity Description
1a. Development name: Kids Place
1b. Development (project) number: to be determine
2. Designation type: Occupancy by only the elderly <input type="checkbox"/> Occupancy by families <input checked="" 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 checked="" type="checkbox"/>
4. Date this designation approved, submitted, or planned for submission: TBD
5. If approved, will this designation constitute a (select one) <input checked="" type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
7. Number of units affected: TBD
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development

Designation of Public Housing Activity Description	
1a. Development name: Maplewood School	
1b. Development (project) number: to be determine	
2. Designation type:	Occupancy by only the elderly <input type="checkbox"/> Occupancy by families <input checked="" 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 checked="" type="checkbox"/>
4. Date this designation approved, submitted, or planned for submission: TBD	
5. If approved, will this designation constitute a (select one)	<input checked="" type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
8. Number of units affected: 32	
7. Coverage of action (select one)	<input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development

Designation of Public Housing Activity Description	
1a. Development name: North End Homes	
1b. Development (project) number: to be determine	
2. Designation type:	Occupancy by only the elderly <input type="checkbox"/> Occupancy by families <input checked="" 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 checked="" type="checkbox"/>
4. Date this designation approved, submitted, or planned for submission: TBD	
5. If approved, will this designation constitute a (select one)	<input checked="" type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
9. Number of units affected: TBD	
7. Coverage of action (select one)	<input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development

7.0c. Conversion of Public Housing to Tenant-Based Assistance

None of HACB's developments or portions of developments have been identified by HUD or the PHA as covered under section 202 of the HUD FY 1996 HUD Appropriations Act. However, HACB will be analyzing Trumbull Gardens, Marina Village and other single and two-family properties to determine if conversion to tenant-based assistance is appropriate for the sites.

7.0d. Homeownership

HACB has suspended its homeownership program that had been approved under section 5(h) (42 U.S.C. 1437c(h)). Following is the activity description:

Public Housing Homeownership Activity Description	
1a. Development name:	Scattered Sites
1b. Development (project) number:	to be determined
2. Federal Program authority:	<input type="checkbox"/> HOPE I <input checked="" 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 checked="" 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:	(3/31/1999)
5. Number of units affected:	20
6. Coverage of action: (select one)	<input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development

Public Housing Homeownership Activity Description	
1a. Development name:	Various Scattered Sites single family homes
1b. Development (project) number:	all projects may be affected
2. Federal Program authority:	<input type="checkbox"/> HOPE I <input type="checkbox"/> 5(h) <input type="checkbox"/> Turnkey III <input checked="" type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/1/99)

<p>3. Application status: (select one)</p> <p><input type="checkbox"/> Approved; included in the PHA's Homeownership Plan/Program</p> <p><input type="checkbox"/> Submitted, pending approval</p> <p><input checked="" type="checkbox"/> Planned application</p>
<p>4. Date Homeownership Plan/Program approved, submitted, or planned for submission: TBD</p>
<p>5. Number of units affected: 20</p> <p>6. Coverage of action: (select one)</p> <p><input checked="" type="checkbox"/> Part of the development</p> <p><input type="checkbox"/> Total development</p> <p>The BHA is reviewing its entire public housing inventory to determine the most appropriate housing to remain within our portfolio. Upon completion of this review, certain public housing properties most appropriate for creating additional housing will be disposed of under the Section while those most appropriate for homeownership opportunities will be identified under the homeownership section.</p>

HACB also plans 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. The proposed Program, which will be limited to 25 families or fewer, will employ the following minimum criteria for its Section 8 Homeownership Program:

- Eligible households will make a minimum of 3percent down payment towards the purchase of the home.
- At least 1percent of the down payment will come from the household's resources.

7.0e. Project-based Vouchers

HACB intends to use this program to provide housing for preferred populations as well as for people living at or below 30 percent of area median income. Consequently, the parameters of the project-based voucher program will correspond with the housing needs, and the admissions and occupancy guidelines already in place at HACB.

Following is a table indicating the number and general locations of project-based vouchers in HACB's program.

LIST OF PROPERTIES

Project Based Section 8 Units Under Contract as of June 2012

Address	Units
54-58 Clarence	6
247 Jane	2
235 Park	1

40 Sanford	6
200-208 Carroll Ave	4
1986-88 Seaview Ave	3
279-283 William St	1
19 Waldorf Ave	1
530 E Washington Ave	2
2575 Main St	3
150 Black Rock Ave	3
156-160 Norman St	3
160 Black Rock Ave	2
162-166 Norman St	3
204-206 Black Rock Ave	2
23 Goddard Ave	1
336-338 Hanover St	3
344-346 Hanover St	3
350-352 Hanover St	3
354-356 Hanover St	3
372-376 Hanover St	3
378-382 Hanover St	3
59 Hanover St	1
63 Hanover St	1
1011 Hancock Ave	2
127 – 128 Bradley St	2
261-263 Clinton Ave	2
49 Pacific St	2
76-78 Baldwin St	2
125 Columbia St	1
29 Ridge Ave	1
101 Sawyer Rd	1
249 Wilmot Ave	1
33 Yale St	2
609 Arctic St	5
1071 Pembroke St	6
80-140 Yale St	7
265-269 Barnum Ave	3
271 Barnum Ave	1
380-382 Barnum Ave	2
480 East Washington Ave	1
496-498 East Washington Ave	4
530 Kossuth St	1
554 Kossuth St	1
657 Kossuth St	1
401 Noble Ave	1

327 Barnum Ave	1
275 Barnum Ave	1
331 Barnum Ave	1
486 East Washington Ave	1
556 Kossuth St	2
465-475 Noble Ave	6
564 Kossuth St	6
1235 Huntington Tpke	12
588-612 East Main St	10
753-777 Arctic St	5
1062 Fairfield Ave	16
431 Washington Ave	19
329 Barnum Ave.	1
572 E. Washington Ave.	2
31 Ridge Ave.	1
13-17 Linen Ave. 3	3
401 Noble Ave	1
327 Barnum Ave	1
275 Barnum Ave	1
331 Barnum Ave	1
486 East Washington Ave	1
556 Kossuth St	2
465-475 Noble Ave	6
564 Kossuth St	6
1235 Huntington Tpke	12
588-612 East Main St	10
753-777 Arctic St	5
1062 Fairfield Ave	16
431 Washington Ave	19
329 Barnum Ave.	1
572 E. Washington Ave.	2
31 Ridge Ave.	1
13-17 Linen Ave.	3
177 Wordin Ave.	3
184 Beach St.	2
187-189 Priscilla St.	2
260-262 Beardsley St.	4
303 Harral Ave.	3
41 Beatrice St.	2
680 Dewey St.	3
700 Capital Ave.	1
81 Newfield Ave.	3
89-91 Mill Hill Ave.	2

955 Main St.	4
511 Carroll Ave.	3
164-166 Williams St.	6
246 Hanover St.	2
212-214 Maplewood Ave.	6
547-549 Brooks St.	2
551-553 Brooks St.	2
49-51 Pacific St.	2
231-233 Lewis St.	2
88-102 Smith St.,	6

8.0 Capital Improvements

Capital Fund Program/Modernization Activities

HACB will follow its established modernization priorities in order to ensure ongoing long-term physical and social viability of our developments:

- Emergency Work—eliminate any emergency or potential emergency conditions. Emergency remediation must be expedient and sensitive to budgetary constraints.
- Statutory or Code Compliance, in particular, 504 compliance.
- Energy Performance Contract measurement, verification and maintenance
- Building Envelope—roofing, brick repair/replacement, window and door replacement, etc.
- System Replacement—whole structure concerns, such as plumbing, electrical, HVAC, etc.
- Interiors—unit- and office-specific improvements and repairs.
- Administrative Activities—management and operational improvements, such as staffing, A & E consultations, special consultation firms, security needs, resident programs, training, acquisition, relocation, technology improvements and inventory controls.
- Grounds—improvements established in our site master plans.
- Development Activities—construction and acquisition and rehabilitation of properties to meet Father Panik Village Replacement requirements and/or to increase supply of affordable rental housing units.

8.1 Capital Fund Program Annual Statement/Performance and Evaluation Report

HUD form 50075.1 is attached. ct001a0 for capital fund; ct001b0 for replacement housing factor

8.2 Capital Fund Program Five-Year Action Plan

HUD form 50075.2 is attached. ct001

8.3 Capital Fund Financing Program

HACB proposes to use a portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHP) to repay debt incurred to finance capital improvements.

9.0 Housing Needs

HACB's PNA, which was completed in 2009, provides an evaluation of sites based not only on their immediate and unique strengths and deficits, but also in the wider context of

their strengths and weaknesses in the community at large, that is, from immediate neighborhoods to the greater City. Consequently, HACB has created a PNA document with assessment data that corresponds to items noted in the City of Bridgeport's Consolidated Plan and in the comprehensive analysis driving Bridgeport's housing policy conducted by CZB. With the approval from the City of Bridgeport, the following material has been reproduced from that analysis. The complete housing policy study conducted by CZB for the City of Bridgeport is available for review at http://bridgeportmasterplan.com/docs/czb_bridgeport.pdf.

A Demographic and Socioeconomic Snapshot of Bridgeport

According to the American Community Survey, Bridgeport was home to just over 32,000 residents in 2005. Those residents were substantially more diverse and significantly more vulnerable than residents in other portions of Fairfield County. Data at the Census tract level from 2000 (the most recent year available) and city and county wide data from 2005 (again, the most recent year available) clearly indicate the roots of the city's fiscal weakness: Bridgeport households are far more likely to live below the poverty level, earn less overall, rely on public assistance, and be led by single mothers than Fairfield County households; and Bridgeport adults are far more likely to be under-educated and unemployed than Fairfield County adults.

And, despite the promise of pent up demand manifest by the potential for Steel Point and other developments, Bridgeport has continued to lose ground against the Fairfield County in recent years. While the county added more than 56,000 residents between 1990 and 2005, the city lost nearly 10,000 – a decline of almost 7%. Those households that did move into Bridgeport in the 1990s averaged incomes equal to just 40% of the typical income among households moving into Fairfield County as a whole. City household incomes increased at a slower rate than county incomes over the course of the 1990s. By 2000, more Bridgeport households earned less than 30% of the Area Median Income, and fewer earned at least 80% of the Area Median Income than had in 1990. Between 2000 and 2005, poor Fairfield County residents remained highly concentrated and minority Fairfield County residents became increasingly concentrated in Bridgeport.

These conditions and trends undermine the city, its neighborhoods, and its residents in multiple ways. High-poverty neighborhoods typically have higher rates of crime and poorer quality public services, and offer adults and children less access to self-sufficiency and quality employment or education. Such socioeconomic distress can also prompt ongoing neighborhood decline: socioeconomic distress makes residents unable to improve their communities or encourage landlords to do so; social distress also weakens the demand for local housing, thereby reducing insiders' and outsiders' willingness to move into or invest in neighborhood units. Across Bridgeport, these realities force the city to do more with less, or to provide a wider array of social services with fewer resources (and less revenue-generating capacity).

None of this is lost on the regional home-buying public, primarily comprised of strong middle market households capable of and quite willing to spend exorbitantly on housing in the county so as to avoid spending in Bridgeport. However pent up, demand is waiting for signals that new housing stocks exist in Bridgeport, that development can occur seamlessly in Bridgeport, and that neighborhoods are becoming more amenable to middle income sensibilities in Bridgeport. These signals can come through a combination of factors, such as public investments in beautification, higher levels of service delivery, increased standards or care through improved tenancy, and an increased sense of safety.

Who Lives in Bridgeport Now

The City of Bridgeport's total population has been declining since 1950 – a trend that accelerated between 1970 and 1980 and again between 2000 and 2005. The city's experience since 1990 contrasts sharply with Fairfield County's: rather than losing 7% of its population (like Bridgeport did), the county grew by 7%, adding over 56,000 new residents while Bridgeport lost nearly 10,000.

The city's experience also differs from those of other nearby municipalities: Norwalk added roughly 8,000 new residents and Stamford added more than 10,000 new residents during this time.

In 2005, the city's 132,011 residents were substantially more diverse than the county's roughly 884,000 residents. That year, just 27% identified as non-Hispanic white (compared to 70% countywide) while 36% identified as African American (up from 30% in 2000) and 32% identified as Hispanic.

Although already largely concentrated in Bridgeport by 2000, Fairfield County's African American residents became increasingly concentrated in Bridgeport between 2000 and 2005. In 2000, 48% of the county's black residents lived in Bridgeport (while just 16% of the county's overall population did so). Five years later, over half of Fairfield County's African American population lived in Bridgeport.

In contrast, outside of the County's other cities, at least 90% of residents were non-Hispanic white in 2000 (the last year data was available at the Census tract level).

In 2005, the city's population was also significantly more socioeconomically distressed than the County's. That year, three out of every six (58%) families with children were headed by single mothers (compared to just 22% countywide), over one-quarter (28%) of adults had not graduated from high school, 18% of residents lived below the poverty level (a rate more than double the county's), one out of every ten workers (9.9%) was unemployed, and the typical household earned just half as much as the typical household countywide.

While the city's portion of adults without a high school degree and unemployment rate declined (from 35% and 11%, respectively) between 2000 and 2005, other indicators remained relatively constant. And by 2000, most issues were primarily found in Bridgeport (and, to a lesser degree, in other Fairfield County cities) and not found in the area's suburban communities.

Poverty Rate (2000) Female-headed Households (2000)

In 1999 (the year reported by the 2000 Census), most city census tracts had median incomes below 50% of the Area Median Income that year; several had medians below figures, Bridgeport's Area Median Family Income was \$79,900 for a family of four and \$71,900 for a family of three.

By 2005, the city's income distribution was decidedly bottom-heavy: two-thirds (62%) of Bridgeport households had annual incomes below \$50,000; half (48%) had annual incomes below \$35,000.

Most problematic, though, is the region's income distribution. In both 2000 and 2005, the city's median income was equal to just half the County's. Between 2000 and 2005, the city's median actually fell relative to the County's, increasing by just 7% while the county's rose by 10%.

The percentage of households in Bridgeport earning over 80% of the AMI actually decreased between 1990 and 2000, from 50% to 38%. At the same time, the portion of households earning less than 30% of the AMI increased, from 21% to roughly 25%.

Over the course of the 1990s, Bridgeport household incomes also increased at a slower rate than in other parts of Fairfield County – by just 21% in Bridgeport compared to 31% in Fairfield County as a whole. This suggests that Bridgeport residents are not experiencing the same level of economic gain as residents in nearby areas.

These trends are also prompted by the fact that Fairfield County's new higher-income households are not choosing Bridgeport. The average household income of all households and specifically owner households moving into units in Bridgeport during the 1990s were both roughly 40% of the comparable figures for Fairfield County.

Indeed, by 2000, most college graduates and professional workers lived outside of Bridgeport. That year, 40% of county adults had at least a Bachelor's degree, compared to just 12% of Bridgeport adults, and 44% of county adults worked in professional occupations, compared to just 22% for the city. Bridgeport Census tracts had some of the area's lowest portions of both groups in 2000: college graduation rates typically below 15% and less than 10% of workers in professional occupations.

Bridgeport's Housing Stock and Housing Market

The nature of the housing stock in Bridgeport further hampers housing market strength. Realtors, developers, and public officials all pointed to the age and configuration of local units as potential barriers to demand.

Most (68%) of the city's units were constructed prior to 1960; nearly two-fifths (39%) were constructed in 1939 or earlier. While half (51%) of the county's housing stock was at least 45 years old in 2005, a much larger share was fairly new: 21% of county units were built since 1980 (compared to just 10% in the city) and 4% were built since 2000 alone (compared to just 1% in the city).

According to the Census, building permits for just 1,050 units were issued in Bridgeport between 2000 and September 2006, representing a potential (if all permits were actually constructed) increase in housing units of less than 2%. By 2005 (according to the American Community Survey), only 723 units had been added since 2000, representing just 1.2% of the city's new total number of units.

In addition, city properties were more likely to include multiple units per structure and were more likely to have fewer bedrooms than their county equivalents. As of 2005, 33% of Bridgeport units were single-family homes (28% were detached homes and 5% were attached homes), 38% were smaller (2 to 4-unit) multifamily properties, and 28% were larger (5 units or more) multifamily properties. In Fairfield County as a whole, two-thirds (65%) of units were single-family homes and well over half (59%) were single-family detached homes.

Housing vacancy rates and values indicate the extent to which current and potential Bridgeport residents demand the city's existing housing stock. In 2000, the Census found 7.5% of the city's housing units to be vacant and considered 2.4% likely abandoned. The City's abandonment rate was fully three times the County's (0.8%). By 2005, the number of vacant units had increased by 66% in the city: from 4,060 in 2000 to 6,740 in 2005.

In 2000 (the most recent year data was available), vacancy rates in the city were not uniform across all housing types; they tended to be highest in structures with at least 5 units (particularly those with over 50 units) and in housing built either in the 1970's or prior to 1950.

In addition to high vacancy and abandonment rates, the city has some of the region's lowest property values. The median value of owner occupied units actually decreased in Bridgeport between 1990 and 2000, from \$145,600 to \$117,500 (a 19% decline) – while the median value in the county as a whole climbed more than 16%. The city's median did recover between 2000 and 2005 (increasing by 85% to \$218,800) but remained well below the County's.

By 2005, though nearly all (83%) of the county's owner-occupied units were valued at \$250,000 or higher, just one-third (35%) of Bridgeport's were. At the other end of the spectrum, roughly one-fourth (23%) of Bridgeport's owner units were valued below \$150,000.

Additionally, a municipality's homeownership rate is a measure of both demand (for local owner-occupied units and for local neighborhoods) and resident commitment (since homeowners are typically more likely than absentee owners to make necessary repairs or building improvements, and spend more on them when they do; and homeowners are typically more likely than renters to be politically active and volunteer in their neighborhoods). In Bridgeport, just 43% of households owned their homes in 2000 compared to over 69% in the county as a whole. Although the city's homeownership rate increased slightly (to 49% in 2005), it remained well below the county's (which also increased, to 72% in 2005).

A Turning Point

Recent value increases, robust home sales activity, and a spate of new development, as well as feedback from Realtors, lenders, residents and public officials, suggest that Bridgeport is now at a critical turning point.

A significant number of development projects are in the pipeline in the City of Bridgeport. Once completed, these projects will add nearly 5,000 housing units, almost 1.3 million square feet of retail space, and roughly 300,000 square feet of commercial/industrial space.

This indicates renewed interest in residential and commercial construction in Bridgeport. When interviewed, Realtors and lenders confirmed that they have seen an increase in developer interest over the past five years, with more sales of lots and buildings for development and re-development purposes. At the same time, though continuing to trail Fairfield County medians, the city's median sale price for condominiums and for single-family homes both gained ground between 2004 and 2006.

Over the same time period, the portion of Bridgeport sales priced below \$200,000 decreased from 61% in 2004 to just 45% in 2006. The portion of sales priced below \$100,000 declined by an even larger margin: from 17% in 2004 to less than 11% in 2006. Sales priced at or above \$250,000 increased between 2004 and 2006, from less than 7% of all sales in 2004 to roughly 16% in 2006.

The median sale price per square foot offers more insight into the extent that housing prices have increased and also enable cleaner comparisons between city and county values (that are not distorted by differences in housing size). The median sale price per square foot for all residences in Bridgeport increased by 22.6% between 2004 and 2006. Although Bridgeport's median price per square foot in 2006 (\$152) was lower than Fairfield County's (\$269), home prices per square foot have increased at a much faster rate in Bridgeport than in the county as a whole.

The price of rental units is also increasing in Bridgeport. According to data from the Department of Housing and Urban Development (HUD), the city's Fair Market Rents have increased an estimated 27% since the 2000, or an average of roughly 4.1% per year

– outpacing both median household incomes (which increased by an average of 3.0% per year) and local wages (which increased by an average of just 1.9% per year).

Yearly published Fair Market Rent (FMR) rates by the Department of Housing and Urban Development (HUD) are gross rent estimates that include shelter rent and the cost of utilities, except telephone. The level at which FMRs are set in Bridgeport is expressed as the 40th percentile rent, the dollar amount below which 40 percent of standard quality rental housing units rent. Newly built units less than two years old are excluded from rent estimates, and adjustments have been made to correct for the below market rents of public housing units included in the data base.

Quantitative data and qualitative feedback both confirm that Bridgeport’s rental market is currently very tight. Based on interviews of property managers conducted in November and December of 2006, only 2.7% (11 of 425) of units were found to be vacant. (Typically, vacancy rates around 5% suggest some equilibrium in the market, or that there is sufficient supply to provide renters with a choice of product. Vacancy rates below this threshold indicate an under-supply of housing; rates above this level suggest over-supply.) Evaluated by unit type, vacancy rates for efficiency apartments are the highest (4.9%), followed by 2-bedroom units (2.7%) and 1-bedroom units (1.3%).

In addition, property managers also noted that units, regardless of bedroom size, tend to be in equal demand, and that turnover rates tend to be relatively low, typically ranging between 1 to 5 units per year.

In subsidized apartments, vacancy rates are even lower. Only 3 of the 765 units represented in surveys of subsidized property managers were vacant (although all three were already rented, just not yet occupied). All section 8 properties available to seniors and persons with disabilities reported waitlists ranging from 6 months to 3 years.

Preserving Affordability

What does this all mean? The gap between what housing in Fairfield County costs and what the average county household can afford coupled with Bridgeport’s relative affordability will catch developers’ attention; more and more, they will see the city as a viable location for investment and city properties as opportunities on which to build products in demand. The city’s unique urban setting further opens the door for a renaissance in Bridgeport, provided development appetites are greeted with clear signals from the city regarding expectations. Since such activity eventually translates into higher housing costs, one of those expectations is that private market development activity today and in the future generates resources (housing or housing dollars) capable of offsetting these costs in the form of affordable housing protections.

Feedback from Realtors, lenders, residents and government officials generally confirmed the popular perception that “Bridgeport is going to improve because the market forces are there,” and also the widespread concern that this improvement will make the city less affordable. To a certain extent, affordability is already an issue in Bridgeport: values and rents are increasing faster than incomes, and a large portion of city residents have existing housing needs (either live in overcrowded conditions or pay too much for their housing unit).

Concerning owner units, housing prices are rising faster than local incomes. And while homes in Bridgeport are the most affordable in Fairfield County, they are not necessarily affordable to local Bridgeport households. In 2005, just one-third (32%) of all owner units was affordable to households at 80% of the Area Median Income (for a family of 3); only 12% were affordable to households at 80% of the city’s median household income.

Making matters worse, the portion of “affordable” for-sale housing is shrinking: While roughly 61% of homes were sold at prices below \$200,000 in 2004, this was true of just 45% of sales in 2006 and only 32% of units listed for sale as of November 19, 2006. And new construction is adding more expensive (not more affordable) units. In 2006, Bridgeport’s median sale price for homes sold within one year of construction was 56% higher than the median sale price for existing units (\$296,450 for a new home versus \$190,000 for an existing home).

With rents also rising faster than income, a substantial portion of Bridgeport households are “cost-burdened” (paying at least 30% of income on housing costs). In 2000, roughly 40% of city households (43% of renters and 33% of owners) paid too much for housing – compared to just 31% of households in the county as a whole. At least two-thirds (68% or more) of owners and renters earning less than 50% of the AMI had some housing problem in 2000.

By 2006, nearly three-quarters of households earning less than 50% AMI had housing problems.

Bridgeport’s Neighborhoods

A closer look at the city’s 17 neighborhoods illustrates the extent to which people- and place-based conditions and housing market strength vary across Bridgeport. This diversity highlights the distinct needs of the city’s various types of neighborhoods and, by doing so, argues against a one-size-fits-all housing policy response.

As different as they are, though, Bridgeport’s neighborhoods can be grouped according to current socioeconomic characteristics and recent trends, the existing housing stock, and present market conditions. This analysis explicitly categorized neighborhoods into two typologies, one based on the local housing stock and a second based on local housing market strength. These clusters can help organize the city’s housing policy approach to its neighborhoods: Housing and neighborhood revitalization strategies can be tailored to these types of places, and then specified to individual neighborhoods.

According to U.S. Census data from 1990 and 2000 (the most recent year for which data was available at the Census tract level), half of the city’s neighborhoods lost residents over the course of the 1990s and half of the city’s neighborhoods gained residents.

For the most part, population increases occurred in Census tracts within the city’s more northerly neighborhoods: Brooklawn, the North End, Lake Forest, Whiskey Hill, North Bridgeport and Success Park/Boston Avenue. Mill Hill, the East End and East Side, Downtown, the South End, and southern portions of the West End/West Side registered some of the greatest losses.

Population Change by Neighborhood, 1990-2000

Bridgeport’s social distress is similarly concentrated in particular neighborhoods. In areas like the East Side, West End/West Side and Hollow, nearly (if not more than) half of adults have not graduated from high school and fewer than 10% have a college degree or are employed in professional occupations, over 10% of the workforce is unemployed, at least one-quarter of residents live below the poverty line, and half of all families with children are headed by single mothers.

In contrast, in areas like the North End, Lake Forest and Brooklawn, the vast majority of adults have high school degrees and nearly twenty percent have college degrees, roughly one-fifth of workers are employed in professional occupations and just 6% are unemployed, barely one-tenth of residents live below the poverty line and less than one-third of families with children are headed by single mothers.

Most adults in Census tracts in the city's central neighborhoods did not graduate from high school. Alternatively, at least 20% of adults have a Bachelor's degree or more in Census tracts in Black Rock, Brooklawn, the North End and the South End.

A larger share of adult residents are professional workers in Census tracts in Lake Forest, the North End, Brooklawn and Black Rock; a larger share of adult residents (at least 20%) are unemployed in parts of the East Side and West End/West Side, the South End, Downtown, the Enterprise Zone. "High-poverty" areas are those with poverty rates at or above 40%. Residents of high-poverty neighborhoods typically deal with lower-quality public services (particularly schools, face higher levels of crime and property abandonment, and have less access to jobs. Tracts in the West End/West Side and East Side had poverty rates at this level in 2000. Nearly all of the West End/West Side, South End, Downtown, Hollow, Enterprise Zone, the East Side, and East End, had poverty rates at or above 20% in 2000. High-poverty Census tracts have some of the city's highest unemployment rates and lowest education levels.

In addition, at least half of all families with children are headed by single mothers in most high-poverty Census tracts. This is the case throughout the East Side, East End, and Downtown, and in much of the West End/West Side.

Not surprisingly, Bridgeport's high-poverty neighborhoods had some of the city's lowest median household incomes in 1999. Additionally, high-poverty and low-income neighborhoods also typically had the smallest increases in median incomes over the course of the 1990s. Downtown and the East Side actually both saw their median incomes decline between 1989 and 1999.

Alternatively, median incomes often rose the most in higher-income areas (like Lake Forest and Black Rock). One notable exception was the South End, where the median income was the third lowest in the city in 1999 but where the median income increased by 23% during the 1990s.

Geographically, the city's highest income households live along its northern border, in Lake Forest and Whiskey Hill. Median incomes were also high throughout the North End, Brooklawn, Black Rock and Reservoir, and in parts of North Bridgeport, in 1999. That year, median household incomes were under \$20,000 in Census tracts in the East Side, Downtown, and the West End/West Side.

High poverty rates are commonly linked not only with broader social distress but also with physical distress. In Bridgeport, high-poverty neighborhoods typically had high abandonment rates and lower homeownership rates. In the West End/West Side, East End, East Side, and Downtown, abandonment rates (the portion of units identified as "other" vacant by the 2000 U.S. Census) were often over 5% and homeownership rates less than 30%.

The type of housing in a given neighborhood also appeared to impact local abandonment and homeownership rates. To classify neighborhoods into a Housing Stock Typology reflecting housing type, czb reviewed each neighborhood's portion of single-family homes, smaller multifamily properties (those with 2 to 4 units per structure) and larger multifamily properties (those with 5 or more units per structure) (according to the U.S. Census), and then grouped neighborhoods with similar building profiles.

Bridgeport's Housing Stock Typology includes:

1. "Suburban" neighborhoods (Lake Forest, Whiskey Hill, and Reservoir), with primarily single-family units.

2. “Suburban/Mixed” neighborhoods (North Bridgeport, North End, Brooklawn, and Success Park/Boston Avenue), with large portions of single-family homes but also substantial amounts of multifamily housing.
3. “Low Density Urban” neighborhoods (East End, East Side, Black Rock, Mill Hill, St. Vincent, West End/West Side, and Hollow), with fewer single-family units and mostly smaller multifamily properties.
4. “High Density Urban/Commercial” neighborhoods (Enterprise Zone, South End, and Downtown), with mainly large multifamily units or non-residential properties.

Both rents and values were highest in Census tracts along the city’s northern and western borders (where socioeconomic profiles are strongest, housing problems are lowest, and neighborhoods are more suburban); both rents and values were lowest in Census tracts in central and southeastern Bridgeport (where socioeconomic profiles are weakest, housing problems are greatest, and smaller multifamily housing is more prevalent).

To update the 2000 Census figures, czb reviewed single-family and multifamily sales from 2004 to 2006, provided by the multiple listing service. Neighborhoods’ average sale prices for single-family and multifamily housing were compared to other neighborhoods’, and those significantly (at least one standard deviation) above or below the overall average were flagged. According to this data, the city’s strongest markets are Black Rock, Lake Forest, and Brooklawn; the City’s weakest market is the East End.

Sources: U.S. Census 1990 and 2000; American Community Survey, 2005; U.S. Census Bureau; CHAS; RRC Associates, Inc; Fairfield County MLS; Bridgeport Office of Economic Development website; Property Manager interview (2006); ERSI Business Analyst; czbLLC

Analysis of HACB’s waiting lists and existing families for public housing and Section 8 was also conducted to discern the specific housing needs of families in HACB’s jurisdiction:

Housing Needs of Families at Charles Greene Homes (The public housing waiting list is open.)			
	# of families	% of total families	Annual Turnover
Waiting list total	894		
Extremely low income <=30% AMI			
Very low income (>30% but <=50% AMI)			
Low income (>50% but <80% AMI)			
Families with children	741		
Elderly families	36		
Families with	209		

Housing Needs of Families at Charles Greene Homes (The public housing waiting list is open.)			
Disabilities			
White families	N/A		
Black families**	N/A		
Hispanic families*	N/A		
Asian families	N/A		
American Indian	N/A		
* Hispanic families may also be counted as white families ** Black families may be Hispanic			
Characteristics by Bedroom Size (Public Housing Wait List Only)			
1BR			
2 BR	780		
3 BR	75		
4 BR			
5 BR			
5+ BR			

Housing Needs of Families at Fireside Apartments (The public housing waiting list is open.)			
	# of families	% of total families	Annual Turnover
Waiting list total	389		
Extremely low income <=30% AMI			
Very low income (>30% but <=50% AMI)			
Low income (>50% but <80% AMI)			
Families with children	N/A		
Elderly families	121		
Families with Disabilities	376		
White families	N/A		
Black families**	N/A		
Hispanic families*	N/A		
Asian families	N/A		
American Indian	N/A		
* Hispanic families may also be counted as white families ** Black families may be Hispanic			

Housing Needs of Families at Fireside Apartments (The public housing waiting list is open.)			
Characteristics by Bedroom Size (Public Housing Only)			
1BR	389		
2 BR			
3 BR	N/A		
4 BR	N/A		
5 BR	N/A		
5+ BR	N/A		

Housing Needs of Families at Harborview Towers (The public housing waiting list is open.)			
	# of families	% of total families	Annual Turnover
Waiting list total	354		
Extremely low income <=30% AMI			
Very low income (>30% but <=50% AMI)			
Low income (>50% but <80% AMI)			
Families with children			
Elderly families	98		
Families with Disabilities	345		
White families	N/A		
Black families**	N/A		
Hispanic families*	N/A		
Asian families	N/A		
American Indian	N/A		
* Hispanic families may also be counted as white families ** Black families may be Hispanic			
Characteristics by Bedroom Size (Public Housing Only)			
1BR	354		
2 BR			

Housing Needs of Families at Harborview Towers (The public housing waiting list is open.)			
3 BR	N/A		
4 BR	N/A		
5 BR	N/A		
5+ BR	N/A		

Housing Needs of Families at Marina Village (The public housing waiting list is open.)			
	# of families	% of total families	Annual Turnover
Waiting list total	2005		
Extremely low income <=30% AMI			
Very low income (>30% but <=50% AMI)			
Low income (>50% but <80% AMI)			
Families with children	922		
Elderly families	128		
Families with Disabilities	578		
White families	N/A		
Black families**	N/A		
Hispanic families*	N/A		
Asian families	N/A		
American Indian	N/A		
* Hispanic families may also be counted as white families ** Black families may be Hispanic			
Characteristics by Bedroom Size (Public Housing Only)			
1BR	941		
2 BR	919		
3 BR	104		
4 BR	11		
5 BR			
5+ BR			

Housing Needs of Families at PT Barnum (The public housing waiting list is open.)			
	# of families	% of total families	Annual Turnover
Waiting list total	1025		
Extremely low income <=30% AMI			
Very low income (>30% but <=50% AMI)			
Low income (>50% but <80% AMI)			
Families with children	875		
Elderly families	34		
Families with Disabilities	221		
White families	N/A		
Black families**	N/A		
Hispanic families*	N/A		
Asian families	N/A		
American Indian	N/A		
* Hispanic families may also be counted as white families ** Black families may be Hispanic			
Characteristics by Bedroom Size (Public Housing Only)			
1BR			
2 BR	905		
3 BR	91		
4 BR	7		
5 BR			
5+ BR	N/A		

Housing Needs of Families at all Scattered Sites (The public housing waiting list is open.)			
	# of families	% of total families	Annual Turnover
Waiting list total	2129		
Extremely low income <=30%			

Housing Needs of Families at all Scattered Sites (The public housing waiting list is open.)			
AMI			
Very low income (>30% but <=50% AMI)			
Low income (>50% but <80% AMI)			
Families with children	1562		
Elderly families	89		
Families with Disabilities	639		
White families	N/A		
Black families**	N/A		
Hispanic families*	N/A		
Asian families	N/A		
American Indian	N/A		
* Hispanic families may also be counted as white families ** Black families may be Hispanic			
Characteristics by Bedroom Size (Public Housing Only)			
1BR	286		
2 BR	1,568		
3 BR	197		
4 BR	29		
5 BR	5		
5+ BR	N/A		

Housing Needs of Families at Trumbull Gardens (The public housing waiting list is open.)			
	# of families	% of total families	Annual Turnover
Waiting list total	1346		
Extremely low income <=30% AMI			
Very low income (>30% but <=50% AMI)			
Low income (>50% but <80% AMI)			

Housing Needs of Families at Trumbull Gardens (The public housing waiting list is open.)			
Families with children	1141		
Elderly families	39		
Families with Disabilities	639		
White families	N/A		
Black families**	N/A		
Hispanic families*	N/A		
Asian families	N/A		
American Indian	N/A		
* Hispanic families may also be counted as white families ** Black families may be Hispanic			
Characteristics by Bedroom Size (Public Housing Only)			
1BR			
2 BR	1,165		
3 BR	122		
4 BR	16		
5 BR	4		
5+ BR	N/A		

Housing Needs of Families at Park City (The public housing waiting list is open.)			
	# of families	% of total families	Annual Turnover
Waiting list total	266		
Extremely low income <=30% AMI			
Very low income (>30% but <=50% AMI)			
Low income (>50% but <80% AMI)			
Families with children	N/A		
Elderly families	86		
Families with Disabilities	179		
White families	N/A		

Housing Needs of Families at Park City (The public housing waiting list is open.)			
Black families**	N/A		
Hispanic families*	N/A		
Asian families	N/A		
American Indian	N/A		
* Hispanic families may also be counted as white families ** Black families may be Hispanic			
Characteristics by Bedroom Size (Public Housing Only)			
1BR	266		
2 BR			
3 BR	N/A		
4 BR	N/A		
5 BR	N/A		
5+ BR	N/A		

Public Housing Wait List Demographics as of 6/25/2012 (The public housing waiting list is open.)			
	# of families	% of total families or HOH	Annual Turnover
Waiting list total	2339		N/A
Elderly families	546		
Families with Disabilities Handicap	1118		
White families HOH			
Black families HOH			
Asian families HOH			
American Indian HOH			
Other HOH			
Multiple HOH			
None HOH			
Hispanic families			

Housing Needs of Families on the Section 8 Waiting List as of 6/25/2012 (The waiting list has been closed for more than 72 months with no plan to reopen during this Plan year. Specific categories of families are identified on the waiting list, per the Pequonnock Settlement Agreement.)			
	# of families	% of total families	Annual Turnover
Waiting list total	1333		
Extremely low income <=30% AMI			
Very low income (>30% but <=50% AMI)			
Low income (>50% but <80% AMI)			
Families with children	914		
Elderly families	106		
Families with Disabilities	243		
White families			
Black families			
Hispanic families			
Asian families			
American Indian			
Other			
Multiple			
None/Not defined			

9.1b. Strategy for Addressing Housing Needs

Strategies for addressing housing needs are identified as solutions to specific housing needs.

- **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:
 - Employing effective maintenance and management policies to minimize the number of public housing units off-line.
 - Reducing turnover time for vacated public housing units.
 - Reducing time to renovate public housing units.

- Seeking replacement of public housing units lost to the inventory through mixed finance development.
- Seeking replacement of public housing units lost to the inventory through Section 8 replacement housing resources.
- Maintaining or increasing section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction.
- Undertaking measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required.
- Maintaining or increasing Section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration.
- Maintaining or increasing Section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program.
- Participating in the Consolidated Plan development process to ensure coordination with broader community strategies.
- Utilizing Project-based Section 8 vouchers as per Father Panik Village Replacement Program and as part of community revitalization in partnership with City and private and not-for-profit developers.

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

- Applying for additional Section 8 units should they become available.
- Leveraging affordable housing resources in the community through the creation of mixed-finance housing.
- Pursuing housing resources other than public housing or Section 8 tenant-based assistance.
- Participating, in partnership with the City, HACB in community revitalization initiatives, neighborhood by neighborhood. HACB will utilize its assets and manage them to the full extent within HUD rules and guidelines.
- Identifying and making applications to secure additional funding streams (i.e., through grants as well as State and private funding entities) to acquire, rehabilitate, and construct new affordable units.

➤ **Need: Housing for Specific Family Types, i.e., Families at or below 30% of Median Income (AMI)**

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

- Exceeding HUD federal targeting requirements for families at or below 30% of AMI in public housing.
- Exceeding HUD federal targeting requirements for families at or below 30% of AMI in tenant-based Section 8 assistance.
- Adopting rent policies to support and encourage work.
- Operating flat rents at a reduced rate of the fair market rent for each geographic area in Bridgeport: East End, East Side, Hollow, South End, West End, Black Rock and North End.

- Maximizing the number of affordable homeownership opportunities available to HACB residents.
 - Expanding Project-based Section 8 program to collaborate with agencies offering supportive services for families coming out of homelessness.
 - Refer residents to the Stable Families Program, which provides supportive services to HACB residents who demonstrate instability (as indicated by rent payment arrearages and/or by other resident complaints) in their current housing circumstances.
- **Need: Housing for Specific Family Types, i.e., Families at or below 50% of median income (AMI)**
 Strategy: Target available assistance to families at or below 50% of AMI by:
- Employing admissions preferences aimed at families who are working.
 - Adopting rent policies to support and encourage work.
 - Maximizing the number of affordable homeownership opportunities available to HACB residents.
- **Need: Housing for Specific Family Types, i.e., the Elderly**
 Strategy: Target available assistance to the elderly by:
- Seeking designation of public housing for the elderly.
 - Apply for special-purpose vouchers targeted to the elderly, should they become available.
 - Implementing programs that increase health and human services for residents of Harborview Towers and Fireside Apartments.
 - Exploring conversion of other housing stock to support the housing needs of the elderly/disabled.
 - Utilizing Section 8 vouchers as subsidy options for elderly people with disabilities.
- **Need: Housing for Specific Family Types, i.e., Families with Disabilities**
 Strategy: Target available assistance to Families with Disabilities by:
- Carrying out the modifications needed in public housing based on the Section 504 Needs Assessment for Public Housing.
 - Applying for special-purpose vouchers targeted to families with disabilities, should they become available.
 - Affirmatively marketing to local non-profit agencies that assist families with disabilities.
 - Implementing programs that increase health and human services for residents of Harborview Towers and Fireside Apartments.
 - Exploring conversion of other housing stock to support the housing needs of the elderly/disabled.
 - Utilizing Section 8 vouchers as housing options for people with disabilities.
 - Linking with local, state and federal programs to provide housing options with supportive services.

- Complying with negotiated settlements that support the housing needs of the disabled.

➤ **Need: Housing for Specific Family Types, i.e., per races or ethnicities with disproportionate housing needs**

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

- Affirmatively marketing to races/ethnicities shown to have disproportionate housing needs.

Strategy 2. Conduct activities to affirmatively further fair housing, e.g.:

- Counseling Section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units.
- Marketing the Section 8 program to owners outside of areas of poverty /minority concentrations.
- Targeting HACB replacement and homeownership programs and activities in non or low-impacted areas.
- Promoting rental opportunities for existing public housing units in local newspapers to the community at large who are at 80percent or below of the AMI.
- Working in coordination with the City of Bridgeport to address fair housing impediments as identified in their 2008 updated Consolidated Plan.
- Educating tenants, landlords, property managers, real estate agents, etc. about the rights and responsibilities of all under the CT fair housing laws.
- Training staff on fair housing issues, rules and regulations.

Following is a list of factors that influenced HACB'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.

10.0 Additional Information

10.0a. Progress in Meeting Mission and Goals.

General Description

The Housing Authority of the City of Bridgeport (HACB) has made significant achievements in the past year. HACB has:

- Received two Standard & Poor's "A" ratings, one for the management of the agency as a whole, the other for the merit of the EPC in 2009. (The S&P ratings were solicited by HACB as part of the financing requirements for EPC.)
- Completed a comprehensive Physical Needs Assessment in 2009, which serves not only to inventory our current portfolio and itemize expenditures for our short-, medium-, and long-range financial planning for sites, but also to inform HACB's comprehensive modernization, disposition and development plans for the next year and into the next decade;
- Maintained and expanded partnerships with social service and behavioral health providers who serve difficult to house populations, including homeless, prison reentry, and survivors of domestic violence.
- Achieved significant improvements in remediating vacancy statistics by expediting lease up/resident qualification process and unit turnaround time.
- Identified, researched, tested, and purchased a new IT program to integrate financial, administrative, development, and management reporting and forecasting into a seamless, unified system for use across agency departments.

HACB also continues to satisfy its previously identified goals:

- Landscape and Security Surveillance Master Planning for our family complexes;
- 504 alterations and additions necessary to satisfy a Voluntary Compliance Agreement with HUD;
- Management improvements and strategic staff changes intended to streamline and enhance organizational, operational, policy and procedural efficiencies;
- Completion of a master plan, approved by Connecticut Legal Services, to complete the Father Panik Village and Pequonnock Replacement Programs;
- Ongoing leasing, particularly at Fireside/Forest Green and Harborview Towers, to meet the requirements of the Matyasovsky consent decree;
- Establishment and development of a Project-Based Section 8 program, which, in collaboration with community service providers, allows residents access to a full range of supportive social, economic, and behavioral health services.
- Obligation and expenditure of Capital Fund allocation for identified improvements across HACB's physical plant.

These varied accomplishments are intended to address four distinct areas of concern:

1. Resident satisfaction and quality of life;

2. Safe, attractive housing developments and scattered site public housing properties;
3. Streamlined, efficient management operations; and
4. Financial efficiency.

The objectives achieved also reflect HACB's ongoing goal of becoming a HUD-designated High Performing PHA.

The 2012-2013 annual plan is also informed and aided by the additional funding made available through competitive grants. HACB is committed to explore any and all efficiencies and cost saving measures to allow the agency to maximize the dollars it is granted through both ACC and ARRA, and to further leverage the dollars awarded through the many additional grant and low-interest loan programs, lean real estate prices, and other advantages afforded in the current local and national economic climate.

Following are brief progress reports on some of HACB's major ongoing projects:

Father Panik Village Replacement Program

By July 2012, the Authority will have completed the Father Panik Village (FPV) Settlement Agreement. The settlement resulted in HACB creating 1,203 units of public housing in Bridgeport over a twenty year period. The settlement of the FPV lawsuit will enable HACB to create multi-use, multi-income developments that will attract mixed income groups of younger professions and families.

Capital Fund Program/Modernization Activities

HACB has implemented a plan to address the provisions of the Voluntary Compliance Agreement, while simultaneously addressing deferred maintenance concerns and reducing unit vacancies. In 2012-2013 HACB will follow its established sequencing of modernization priorities:

- Emergency Work—eliminates any emergency or potential emergency conditions. Emergency remediation must be expedient and sensitive to budgetary constraints.
- Statutory or Code Compliance, in particular, 504 compliance.
- Building Envelope—roofing, brick repair/replacement, window and door replacement, etc.
- System Replacement—whole structure concerns, such as plumbing, electrical, HVAC, etc.
- Interiors—unit- and office-specific improvements and repairs.
- Administrative Activities—management and operational improvements, such as staffing, A & E consultations, special consultation firms, security needs, resident programs, training, acquisition, relocation, technology improvements and inventory controls.
- Grounds—improvements established in our site master plans.

- Development Activities—construction and acquisition and rehabilitation of properties to increase supply of affordable rental housing units.

Public Housing Asset Management Program

HACB continues to work to improve its vacant unit turnaround time and to raise its occupancy rate; the goal is to have units ready within 14-21 days of vacancy, and to gain new occupancy within 7 days of unit readiness

Consent Decree Office

This department was established to respond to the requirements of the Voluntary Compliance Agreement and the Matyasovsky Consent Decree as well as the Father Panik Consent Decree and Pequonnock Memorandum of Agreement. The requirements of all agreements directly affect the admissions process; therefore, the Authority gave the Consent Decree Office the responsibility to supervise the admissions office.

Section 8 Program

The program has a 93% utilization rate. HACB changed its policy to increase the maximum payment standard to 100% of the 2012 fair market rent.

Resident Services

HACB has been active in its efforts to develop operating local councils and a strong Resident Advisory Board. We have and will continue to provide resident training activities for the leadership and for employment and/or self-sufficiency improvements. We are committed to making the resident associations viable and productive. The Authority will work with local agencies to ensure that local initiatives are inclusive of programs that will enable the residents to become economically self-sufficient. The Authority will continue to seek local, state and federal funding that will provide economic self-sufficiency and empowerment programs for residents. The Authority will continue to work with residents to develop youth and adult leaders that are viable members of the community.

Security

HACB expects continued baseline police service from the Bridgeport Police Department through the Cooperation Agreement between the Authority and the City of Bridgeport. In the meantime, we will continue providing security guard services at Trumbull Gardens, Harborview Towers and Fireside Apartments. We intend to install, in phases, an integrated BHA networked CCTV system at critical locations and monitored centrally. Aggressive screening measures are in place and lease enforcement will continue. HACB received funding to provide security cameras in Marina Village and Charles F. Greene Homes, Inc.

Conclusion

HACB is ready for the challenges ahead. It is our earnest goal to make this housing authority a high performing authority, one that serves its residents and community with the greatest efficiency and innovation among the other high performing PHAs in our state and across our nation. To achieve this goal, HACB intends to work in partnership with the City of Bridgeport, the residents, business entities, community support organizations, the public at large and with HACB's dedicated employees, as well as with State of Connecticut and Federal agencies, especially HUD.

10.0b. Significant Amendment and Substantial Deviation/Modification.

HACB is complying with HUD's default definition of substantial deviation or significant amendment to the Annual Plan, which is as follows:

- Changes to the rent or admissions policies or organization of the wait list.
- Additions to non-emergency work items or change in the use of the replacement reserve funds under the Capital Fund Program.
- Any changes with regard to demolition, designation, homeownership programs or conversion activities.

11.0 Required Submission for HUD Field Office Review

- a) Form HUD-50077 see below
- b) Form HUD-50070 see below
- c) Form HUD-50071 see below
- d) Form SF-LLL see below
- e) SF-LLL-A not applicable
- f) Resident Advisory Board comments – attached as ct001d01
- g) Challenged elements not applicable
- h) Form HUD-50075.1 – attached as ct001b01 and ct001c01
- i) Form HUD-50075.2 – attached as ct001b01

Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

Applicant Name

Housing Authority of the City of Bridgeport

Program/Activity Receiving Federal Grant Funding

Annual and Five Year Plan

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:

a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b. Establishing an on-going drug-free awareness program to inform employees ---

(1) The dangers of drug abuse in the workplace;

(2) The Applicant's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;

d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

2. Sites for Work Performance. The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above. Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)

Check here if there are workplaces on file that are not identified on the attached sheets.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties.
(18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official
Nicholas A. Calace

Title
Executive Director

Signature



Date

07/13/2012

X

Certification of Payments to Influence Federal Transactions

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

OMB Approval No. 2577-0157 (Exp. 01/31/2014)

Applicant Name

Housing Authority of the City of Bridgeport

Program/Activity Receiving Federal Grant Funding

Annual and Five Year Plan

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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

Name of Authorized Official

Nicholas A. Calace

Title

Executive Director

Signature



Date (mm/dd/yyyy)

07/13/2012

**PHA Certifications of Compliance
with PHA Plans and Related
R e g u l a t i o n s**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 08/30/2011

**PHA Certifications of Compliance with the PHA Plans and Related Regulations:
Board Resolution to Accompany the PHA 5-Year and Annual PHA Plan**

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

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA certifies that there has been no change, significant or otherwise, to the Capital Fund Program (and Capital Fund Program/Replacement Housing Factor) Annual Statement(s), since submission of its last approved Annual Plan. The Capital Fund Program Annual Statement/Annual Statement/Performance and Evaluation Report must be submitted annually even if there is no change.
4. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
7. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. For PHA Plan that includes a policy for site based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2006-24);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing;
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
11. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
12. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

13. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
14. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
15. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
16. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
17. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
18. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
19. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
20. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
21. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
22. The PHA certifies that it is in compliance with all applicable Federal statutory and regulatory requirements.

Housing Authority of the City of Bridgeport

CT-001

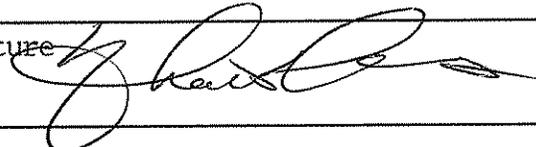
PHA Name

PHA Number/HA Code

5-Year PHA Plan for Fiscal Years 2012- 2017

Annual PHA Plan for Fiscal Years 2012- 2013

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

Name of Authorized Official Shante T. Hanks	Title: Chairperson, Board of Commissioners
Signature 	Date: <i>6/18/12</i>

Civil Rights Certification

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 08/30/2011

Civil Rights Certification**Annual Certification and Board Resolution**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioner, I approve the submission of the Plan for the PHA of which this document is a part and make the following certification and agreement with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing.

Housing Authority of the City of Bridgeport
 PHA Name

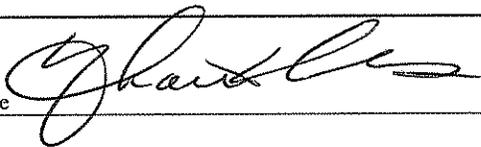
CT001
 PHA Number/HA Code

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

Name of Authorized Official Shante T. Hanks

Title Chairperson, Board of Commissioners

Signature



Date

6/18/12

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

**U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB# 2577-0226
Expires 08/30/2011**

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

I, Kelly McDermott the Senior Manager of Central Grants and Community Development for the City of Bridgeport certify that the Five Year and Annual PHA Plan of this is consistent with the Consolidated Plan of City of Bridgeport prepared pursuant to 24 CFR Part 91.

 10/26/12

Signed / Dated by Appropriate State or Local Official

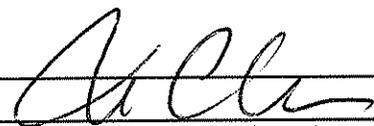
DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

Approved by OMB

0348-0046

(See reverse for public burden disclosure.)

1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____
4. Name and Address of Reporting Entity: <input type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Congressional District, if known: 4c	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:	
6. Federal Department/Agency:	7. Federal Program Name/Description: CFDA Number, if applicable: _____	
8. Federal Action Number, if known:	9. Award Amount, if known: \$ _____	
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI):	b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI):	
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature:  Print Name: <u>Nicholas Calace</u> Title: <u>Executive Director</u> Telephone No.: _____ Date: <u>07/17/2012</u>	
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

**RESOLUTION OF
THE HOUSING AUTHORITY OF THE CITY OF BRIDGEPORT
RESOLUTION NO. 06-18-12-18**

Special Board Meeting Date: June 18, 2011

**RESOLUTION IN SUPPORT OF AND TAKING CERTAIN ACTIONS IN CONNECTION
WITH THE AUTHORITY'S UPDATED FIVE YEAR AND ANNUAL PLAN**

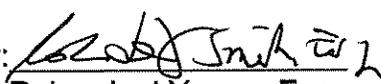
Factual Content Certified

Approved:

Resolution Reviewed
Berchem, Moses & Devlin, P.C.
General Counsel

By: 
Peter Hance
Deputy Executive Director
for Administration

By: 
Nicholas Calace
Secretary/
Executive Director

By: 
Rolan Joni Young, Esq.
A Senior Partner

Commissioner Stack submitted the following resolution:

WHEREAS, the Board of Commissioners reviewed and approved the proposed Five Year Plan and Annual Plan for the fiscal year beginning October 1, 2012 (the "Plan"); and

WHEREAS, the Authority has complied with all statutory requirements regarding the presentation and review of the proposed Plan; and

WHEREAS, the Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the Authority is located; and

WHEREAS, the Board of Commissioners has determined that it is in the best interests of the Authority to adopt the proposed Five Year Plan and Annual Plan as presented; and

WHEREAS, the Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the Authority's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan; and

WHEREAS, the Authority has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the Authority, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR 903.13.) The Authority included in the Plan submission

a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations; and

WHEREAS, the Authority made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment; and

WHEREAS, the Authority will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990; and

WHEREAS, the Authority will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the Authority's involvement and maintain records reflecting these analyses and actions; and

WHEREAS, the Authority will comply with (i) the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975, (ii) the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped, (iii) the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low or Very Low Income Persons and with its implementing regulations at 24 CFR Part 135, and (iv) Davis Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act; and

WHEREAS, the Authority submitted with the Plan certifications with regard to (i) a drug free workplace required by 24 CFR Part 24, Subpart F, (ii) compliance and restrictions on lobbying required by 24 CFR Part 87, along with (a) required disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24; and

WHEREAS, the Authority will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable; and

WHEREAS, the Authority will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a); and

WHEREAS, the Authority will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National

Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58; and

WHEREAS, the Authority will (i) keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements, (ii) comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35; (iii) comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments); (iv) undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan; and

WHEREAS, all attachments to the Plan have been and will continue to be available at all times and at all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the Authority and at all other times and locations identified by the Authority in its Plan and will continue to be made available at least at the primary business office of the Authority.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF BRIDGEPORT THAT:

1. The submission of the final version of the Annual Plan and Five Year to the U. S. Department of Housing and Urban Development is hereby authorized; and
2. The Plan is hereby approved and the Chairperson be and hereby is authorized, empowered and directed to submit the standard Annual and standard 5 Year Plans for the Authority's fiscal year beginning October 1, 2012; and
3. The adoption of the Plan is subject to HUD approval; and
4. This resolution shall take effect immediately.

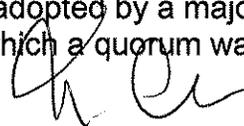
Commissioner Brown seconded the motion.

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[RECORD OF VOTE FOLLOWS]

BOARD OF COMMISSIONERS VOTE OF FINAL PASSAGE					
X – INDICATES VOTE					
COMMISSIONERS	AYE	NAY	NOT PRESENT	NOT VOTING	ABSTENTION
Hanks	x				
Nieves			x		
Stack, Jr.	x				
Brown	x				
Santiago	x				

I hereby certify that the above resolution was adopted by a majority of the Commissioners present at a meeting duly called at which a quorum was present on June 18, 2012.



 Nicholas Calace
 Secretary/Executive Director

7/18/12

 Date

HUD-9011

(11-68)

CERTIFICATE

I, Nicholas Calace, the duly appointed, qualified and Secretary of the Housing Authority of the City of Bridgeport, do hereby certify that the attached resolution from the minutes of the Regular Meeting of the Commissioners of said Authority, held on June 18, 2012 is a true and correct copy of the original minutes of such meeting on file. I do further certify that each resolution is a true and correct copy of a resolution adopted at such meeting and on file and of record.

IN TESTIMONY WHEREOF, I have hereunto set my hand and the seal of said Authority this 19th day of June, 2012.



Nicholas Calace

(SEAL)

Number	Street	Owner	Location	PIC#	Dev#
101	LORRAINE ST	HOUSING AUTHORITY CITY OF BPT	SS	053	881
81	LORRAINE ST	HOUSING AUTHORITY CITY OF BPT	SS	053	881
91	LORRAINE ST	HOUSING AUTHORITY CITY OF BPT	SS	053	881
144	MADISON AV #150	HOUSING AUTHORITY OF	SS	050	882
156	MADISON AV #162	HOUSING AUTHORITY OF	SS	050	882
375	MAIN ST	HOUSING AUTHORITY CITY OF BPT	MarinaApts	vacant lot	
183	MAIN ST	HOUSING AUTHORITY OF CITY OF BRIDGEPORT	SS	055	
25	MARCEL ST	HOUSING AUTHORITY OF CITY OF BRIDGEPORT	SS	055	
145	MARION ST	HOUSING AUTHORITY OF BRIDGEPORT	SS	053	881
23	MARTIN LUTHER KING DR	BRIDGEPORT HOUSING AUTHORITY	SS	036	882
9	MARTIN LUTHER KING DR	BRIDGEPORT HOUSING AUTHORITY	SS	036	882
75	MARTIN LUTHER KING DR	BRIDGEPORT HOUSING AUTHORITY	SS	053	881
61	MARTIN LUTHER KING DR	BRIDGEPORT HOUSING AUTHORITY	SS	053	881
49	MARTIN LUTHER KING DR	BRIDGEPORT HOUSING AUTHORITY	SS	053	881
37	MARTIN LUTHER KING DR	BRIDGEPORT HOUSING AUTHORITY	SS	036	882
38	MCKINLEY AV #40	HOUSING AUTHORITY OF CITY OF BRIDGEPORT	FPV Rep	055	
144	MILES ST	BRIDGEPORT HOUSING AUTHORITY	SS	053	881
272	NEWFIELD AV	HOUSING AUTHORITY OF THE	SS	032	882
530	NEWFIELD AV #534	HOUSING AUTHORITY OF THE	SS	032	882
263	NICHOLS ST	HOUSING AUTHORITY CITY OF BPT	SS	027	881
855	NORMAN ST #01	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #02	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #03	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #04	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #05	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #06	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #07	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #08	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #09	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #10	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #11	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #12	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #13	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #14	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #15	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #16	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #17	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #18	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #19	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #20	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #21	HOUSING AUTHORITY CITY OF BPT	SS	018	882
855	NORMAN ST #22	HOUSING AUTHORITY CITY OF BPT	SS	018	882
220	NORTH BISHOP AV	HOUSING AUTHORITY CITY OF BPT	SS	050	882
566	NORTH RIDGEFIELD AV	HOUSING AUTHORITY CITY OF BPT	SS	030	882
1116	OGDEN ST EX	HOUSING AUTHORITY OF THE CITY	SS	050	882
244	OLIVE ST #246	HOUSING AUTHORITY/CITY OF	FPV Rep	vacant bldg	
725	PALISADE AV	HOUSING AUTHORITY CITY OF BPT	ForestGreen		
655	PALISADE AV	HOUSING AUTHORITY CITY OF BPT	Fireside		
730	PALISADE AV	HOUSING AUTHORITY CITY OF BPT	Fireside		
93	PALISADE AV #97	HOUSING AUTHORITY OF CITY OF BRIDGEPORT	SS	055	
695	PARK AV	THE HOUSING AUTHORITY OF CITY OF BRIDGEPORT	ParkCity H	vacant bldg	
1457	PARK AV #1475	HOUSING AUTHORITY OF THE	SS	037	882
130	PARROTT AV #132	HOUSING AUTHORITY OF THE CITY	SS	053	881
786	PEMBROKE ST	BRIDGEPORT HOUSING AUTHORITY	SS	036	882
838	PEMBROKE ST	BRIDGEPORT HOUSING AUTHORITY	SS	036	882
826	PEMBROKE ST	BRIDGEPORT HOUSING AUTHORITY	SS	036	882
800	PEMBROKE ST	BRIDGEPORT HOUSING AUTHORITY	SS	036	882

Number	Street	Owner	Location	PIC#	Dev#
774	PEMBROKE ST	BRIDGEPORT HOUSING AUTHORITY	SS	036	882
812	PEMBROKE ST	BRIDGEPORT HOUSING AUTHORITY	SS	036	882
762	PEMBROKE ST	BRIDGEPORT HOUSING AUTHORITY	SS	036	882
1435	PEMBROKE ST	HOUSING AUTHORITY OF THE	SS	053	881
1423	PEMBROKE ST	HOUSING AUTHORITY OF THE	SS	053	881
1150	PEMBROKE ST #10	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #11	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #12	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #13	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1373	PEMBROKE ST #1375	HOUSING AUTHORITY OF THE	SS	053	881
1150	PEMBROKE ST #14	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #15	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #16	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #17	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #18	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #19	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #20	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #21	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #22	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #23	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #24	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #25	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #26	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #27	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #28	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #29	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #G01	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #G02	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #G03	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #G04	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #G05	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #G06	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #G07	HOUSING AUTHORITY CITY OF BPT	SS	026	882
1150	PEMBROKE ST #G08	HOUSING AUTHORITY CITY OF BPT	SS	026	882
235	PEQUONNOCK ST #01	HOUSING AUTHORITY CITY OF BPT	SS	025	882
235	PEQUONNOCK ST #02	HOUSING AUTHORITY CITY OF BPT	SS	025	882
235	PEQUONNOCK ST #03	HOUSING AUTHORITY CITY OF BPT	SS	025	882
235	PEQUONNOCK ST #04	HOUSING AUTHORITY CITY OF BPT	SS	025	882
235	PEQUONNOCK ST #05	HOUSING AUTHORITY CITY OF BPT	SS	025	882
235	PEQUONNOCK ST #06	HOUSING AUTHORITY CITY OF BPT	SS	025	882
235	PEQUONNOCK ST #07	HOUSING AUTHORITY CITY OF BPT	SS	025	882
235	PEQUONNOCK ST #08	HOUSING AUTHORITY CITY OF BPT	SS	025	882
235	PEQUONNOCK ST #09	HOUSING AUTHORITY CITY OF BPT	SS	025	882
235	PEQUONNOCK ST #10	HOUSING AUTHORITY CITY OF BPT	SS	025	882
181	PIXLEE PL	HOUSING AUTHORITY OF THE	SS	050	882
71	PRINCE ST	HOUSING AUTHORITY OF THE	SS	051	881
370	PRISCILLA ST #376	HOUSING AUTHORITY OF THE CITY	SS	034	822
53	REMINGTON ST #55	HOUSING AUTHORITY OF CITY OF BRIDGEPORT	SS	055	
155	ROBERT ST	HOUSING AUTHORITY OF CITY OF BRIDGEPORT	SS	055	
243	SALEM ST	HOUSING AUTHORITY OF BPT	SS	033	881
241	SALEM ST	HOUSING AUTHORITY OF BPT	SS	033	881
300	SALEM ST	HOUSING AUTHORITY CITY OF	SS	033	881
30	SALEM ST #34	HOUSING AUTHORITY OF THE	SS	034	882
40	SALEM ST #44	HOUSING AUTHORITY OF THE	SS	034	882
128	SCOFIELD AV #130	HOUSING AUTHORITY CITY OF BPT	SS	028	882
138	SCOFIELD AV #140	HOUSING AUTHORITY OF THE	SS	028	882
1856	SEAVIEW AV	CITY OF BRIDGEPORT HOUSING	SS	053	881

Number	Street	Owner	Location	PIC#	Dev#
59	SEDGEWICK ST	HOUSING AUTHORITY OF THE	SS	041	882
67	SEDGEWICK ST #69	HOUSING AUTHORITY OF THE	SS	041	882
75	SEDGEWICK ST #77	HOUSING AUTHORITY OF THE	SS	041	882
70	SEELEY ST #76	HOUSING AUTHORITY OF THE CITY	SS	053	881
86	SEELEY ST #88	HOUSING AUTHORITY CITY OF BPT	SS	053	881
769	SHELTON ST #771	HOUSING AUTHORITY OF CITY OF	SS	053	881
45	SHERIDAN ST #55	HOUSING AUTHORITY OF THE	SS	035	881
43	SIXTH ST #49	HOUSING AUTHORITY CITY OF BPT	SS	053	881
60	SIXTH ST #62	HOUSING AUTHORITY CITY OF BPT	SS	053	881
581	SOUNDVIEW AV	HOUSING AUTHORITY OF THE CITY	SS	050	882
75	STEWART ST	HOUSING AUTHORITY CITY OF BPT	Fireside		
554	STILLMAN ST	HOUSING AUTHORITY OF THE	SS	050	882
92	SUMMERFIELD AV	HOUSING AUTHORITY OF THE CITY	SS	051	
156	SUNSHINE CR	HOUSING AUTHORITY OF THE	SS	053	881
96	TAYLOR DR	HOUSING AUTHORITY CITY OF BPT	PT Barnum		
508	TRUMBULL AV	HOUSING AUTHORITY OF THE CITY	Trumbull		
507	TRUMBULL AV	HOUSING AUTHORITY OF THE CITY	Trumbull		
597	UNION AV #599	HOUSING AUTHORITY OF CITY OF BRIDGEPORT	SS	055	
659	UNION AV #665	HOUSING AUTHORITY OF BPT	SS	053	881
310	VALLEY AV	HOUSING AUTHORITY OF THE CITY	SS	053	881
111	VELVET REAR ST #15	HOUSING AUTHORITY OF BPT	SS	029	882
85	VELVET ST	HOUSING AUTHORITY OF BPT	SS	029	882
107	VELVET ST #09	HOUSING AUTHORITY OF BPT	SS	029	882
75	VELVET ST #79	HOUSING AUTHORITY OF THE	SS	029	882
87	VELVET ST #REAR	HOUSING AUTHORITY OF BPT	SS	029	882
99	VELVET ST #REAR	HOUSING AUTHORITY OF BPT	SS	029	882
75	VELVET ST #REAR	HOUSING AUTHORITY OF BPT	SS	029	882
177	VOIGHT AV	HOUSING SITE DEV AUTHORITY	FPV rep	vacant lot	
133	WAYNE ST #145	HOUSING AUTHORITY CITY OF BPT	FPV rep	vacant lot	
89	WEST LIBERTY ST #95	HOUSING AUTHORITY OF THE	SS	041	882
102	WEST LIBERTY ST	HOUSING AUTHORITY OF THE CITY	SS	041	882
104	WEST LIBERTY ST	HOUSING AUTHORITY OF THE	SS	041	882
102	WILLISTON ST #104	HOUSING AUTHORITY CITY OF BPT	SS	031	882
380	WOOD AV	HOUSING AUTHORITY CITY OF BPT	SS	041	882
297	WOOD AV #319	HOUSING AUTHORITY OF CITY OF	SS	041	882
319	WOODLAWN AV	HOUSING AUTHORITY OF THE	FPV Rep	vacant lot	
335	WOODLAWN AV	HOUSING AUTHORITY OF THE	FPV Rep	vacant lot	
329	WOODLAWN AV	HOUSING AUTHORITY OF THE	FPV Rep	vacant lot	
367	WOODSIDE AV	HOUSING AUTHORITY CITY OF BPT	SS	039	882
365	WOODSIDE AV	HOUSING AUTHORITY CITY OF BPT	SS	039	882
1059	WORDIN AV	HOUSING AUTHORITY CITY OF BPT	Warehouse		

Part I: Summary					
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: CT26-P001-50112 Replacement Housing Factor Grant No: Date of CFPP:		FFY of Grant: 2012 FFY of Grant Approval:	
Type of Grant					
<input checked="" type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Revised Annual Statement (revision no.)			
<input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1	
		Original	Revised 2	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21)	\$ 306,174			
3	1408 Management Improvements	\$ 612,357			
4	1410 Administration (may not exceed 10% of line 21)	\$ 306,178			
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	\$ 300,000			
8	1440 Site Acquisition				
9	1450 Site Improvements	\$ 394,998			
10	1460 Dwelling Structures	\$ 627,343			
11	1465.1 Dwelling Equipment - Nonexpendable	\$ 269,000			
12	1470 Non Dwelling Structures	\$ 50,000			
13	1475 Non Dwelling Equipment	\$ 73,987			
14	1485 Demolition	\$ 75,000			
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs	\$ 46,750			
17	1499 Development Activities 4				

2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
 3 PHA's with under 250 units in management may use 100% of CFP grant for operations.
 4 RHF funds shall be included here

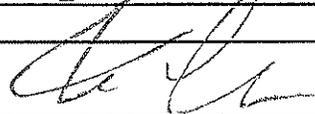
Part I: Summary

PHA Name: Housing Authority of the City of Bridgeport	Grant Type and Number Capital Fund Program Grant No: CT26-P001-50112	FFY of Grant: 2012
	Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval:

Type of Grant

Original Annual Statement
 Revised Annual Statement (revision no.)
 Performance and Evaluation Report for Period Ending:
 Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1	
		Original	Revised 2	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2-19)	\$ 3,061,787			
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

Signature of Executive Director 	Date 1/17/12	Signature of Public Housing Director	Date:
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- 1 To be completed for the Performance and Evaluation Report.
- 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
- 3 PHA's with under 250 units in management may use 100% of CFF grant for operations.
- 4 RHF funds shall be included here

Part II: Supporting Pages								
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: CT26-P001-50112 CFFP (Yes/No) No Replacement Housing Factor Grant No.				FFY of Grant: 2012 FFY of Grant Approval:		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised 1	Funds Obligated 2	Funds Expended	
BHA Wide	Management Improvements/Tech Upgrades	1408	Lump sum	\$207,583				
	Administration	1410	Lump sum	\$306,178				
	Admin Office Improvements, emergency generator	1470	Lump sum	\$35,000				
	Non dwelling equipment	1475	Lump sum	\$18,987				
CT00100002P	Operations	1406	Lump sum	\$43,740				
aka Marina Village	A & E Services	1430	Lump sum	\$100,000				
	Site improvements - parking, drainage, fencing	1450	Lump sum	\$25,000				
	Roofs, façade, heating, storm doors, 504 compliance	1460	Lump sum	\$15,000				
	Demolition	1485	Lump sum	\$75,000				
	Relocation for VCA Compliance/Demolition	1495	5 tenants	\$40,000				
	Dwelling equipment - boilers, emergency generator	1465	Lump sum	\$75,000				
CT00100005P	Operations	1406	Lump sum	\$43,739				
aka PT Barnum Apts	A & E Services	1430	Lump sum	\$50,000				
	Site Remediation, Walkway improvements, Curbs, Parking	1450	Lump sum	\$124,985				
	Doors, windows, kitchen, flooring, roofing, generator	1460	Lump sum	\$50,000				
	Relocation for VCA Compliance	1495	10 tenants	\$2,500				
CT00100006P	Operations	1406	Lump sum	\$43,739				
aka Charles Greene	A & E Services	1430	Lump sum	\$20,000				

continued to page 4

1 To be completed for the Performance and Evaluation Report.

2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement

Part II: Supporting Pages								
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: CT26-P001-50112 CFFP (Yes/No) No Replacement Housing Factor Grant No.				FFY of Grant: 2012 FFY of Grant Approval:		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised 1	Funds Obligated 2	Funds Expended	
aka Charles Greene	Pathways, parking, landscape, playground	1450	Lump sum	\$50,000				
	Bathrooms and kitchen upgrades	1460	Lump sum	\$10,000				
	Heating piping replacement, emergency generators	1465	Lump sum	\$10,000				
	Relocation for VCA Compliance	1495	4 tenants	\$1,000				
	Entrance Lighting and Security, generator	1465	Lump sum	\$69,000				
CT00100007P	Operations	1406	Lump sum	\$43,739				
aka Fireside Apts	A & E Services	1430	Lump sum	\$20,000				
	Gutters, Downspouts, Roofs, Sliding Doors, Bath vents, lightning rod, emergency generators	1460	Lump sum	\$62,343				
	Site Improvements, trees, landscape, sewer, lighting	1450	Lump sum	\$25,000				
	Relocation for VCA Compliance	1495	12 tenants	\$1,250				
	Community Room Upgrades, laundry, doors	1470	1 bldg	\$15,000				
	Non dwelling equipment	1475	Lump sum	\$30,000				
CT00100009P	Operations	1406	Lump sum	\$43,739				
aka Harborview Towers	Management Improvements - Security	1408	Lump sum	\$232,648				
	A & E Services	1430	Lump sum	\$25,000				
	Unit (kitchen, bathroom) upgrades	1460	Lump sum	\$25,000				
	Service elevator, emergency generator	1465	Lump sum	\$25,000				
	Parking Renovations	1450	Lump sum	\$90,000				
	Heating piping replacement	1465	Lump sum	\$10,000				
CT00100044P	Operations	1406	Lump sum	\$43,739				
aka Trumbull Gardens	Management Improvements - Security	1408	Lump sum	\$172,126				

continued to page 5

1 To be completed for the Performance and Evaluation Report.

2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement

Part II: Supporting Pages								
HA Name: Housing Authority of the City of Bridgeport			Grant Type and Number Capital Fund Program Grant No: CT26-P001-50112 CFFP (Yes/ No): No Replacement Housing Factor Grant No:			Federal FFY of Grant: 2012		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
T00100044P	A & E Services	1430	Lump sum	\$ 25,000				
aka Trumbull Gardens	Bldg. 10 front entrance modification	1460	Lump sum	\$ 45,000				
	Doors/Windows	1460	Lump sum	\$ 20,000				
	Grounds improvements, parking, curbs, sidewalks, tennis courts	1450	Lump sum	\$ 25,000				
	Unit boilers, heating piping	1465	Lump sum	\$ 30,000				
	Elevators, emergency generator	1475	Lump sum	\$ 50,000				
	Non dwelling equipment	1475	Lump sum	\$ 25,000				
	Operations	1406	Lump sum	\$ 21,870				
T001000881P	Operations	1406	Lump sum	\$ 21,870				
scattered Sites I	A & E Services	1430	Lump sum	\$ 30,000				
	Site Improvements-parking, drainage, fencing	1450	Lump sum	\$ 25,000				
	Building improvements-roofs, siding, façade, gutter/downspouts, storm doors, intercom, windows, structural at Stratford Avenue	1460	Lump sum	\$200,000				
	Relocation for VCA Compliance	1495	Lump sum	\$ 1,250				
T001000882P	Operations	1406	Lump sum	\$ 21,869				
scattered Site II	A&E Services	1430	Lump sum	\$ 30,000				
	Site improvements-parking, drainage, fencing	1450	Lump sum	\$ 30,013				
	Building improvements-roofs, siding, façade, gutters/downspouts, storm doors, intercom, windows	1460	Lump sum	\$200,000				
	Relocation for VCA Compliance	1495	3 tenants	\$ 750				
			Total	\$3,061,787				

Part III: Implementation Schedule for Capital Fund Financing Program					
PHA Name: Housing Authority of the City of Bridgeport				FFY of Grant: 2012	
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates 1
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
Central Office	9/30/2014		9/30/2016		
BHA Wide	9/30/2014		9/30/2016		
CT00100002P	9/30/2014		9/30/2016		
CT00100005P	9/30/2014		9/30/2016		
CT00100006P	9/30/2014		9/30/2016		
CT00100007P	9/30/2014		9/30/2016		
CT00100009P	9/30/2014		9/30/2016		
CT00100044P	9/30/2014		9/30/2016		
CT00100881P	9/30/2014		9/30/2016		
CT00100882P	9/30/2014		9/30/2016		

1 Obligation and expenditure end dates can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 8/31/2011

Part I: Summary						
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: CT26-P001-50111 Replacement Housing Factor Grant No: Date of CFFP:			FFY of Grant: 2011 FFY of Grant Approval:	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 6/30/2012 <input type="checkbox"/> Final Performance and Evaluation Report						
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹		
		Original	Revised ²	Obligated	Expended	
1	Total non-CFP Funds	\$ 341,811.00	\$ 341,811.00			
2	1406 Operations (may not exceed 20% of line 21) ³	\$ 683,624.00	\$ 683,624.00	\$ 678,504.00	\$ 75,400.28	
3	1408 Management Improvements	\$ 341,812.00	\$ 341,812.00	\$ 341,812.00	\$ 256,358.00	
4	1410 Administration (may not exceed 10% of line 21)					
5	1411 Audit					
6	1415 Liquidated Damages					
7	1430 Fees and Costs	\$ 250,000.00	\$ 250,000.00			
8	1440 Site Acquisition					
9	1450 Site Improvement	\$ 201,013.00	\$ 201,013.00			
10	1460 Dwelling Structures	\$ 711,343.00	\$ 711,343.00			
11	1465.1 Dwelling Equipment—Nonexpendable	\$ 576,000.00	\$ 576,000.00			
12	1470 Non-dwelling Structures	\$ 106,117.00	\$ 106,117.00			
13	1475 Non-dwelling Equipment	\$ 18,000.00	\$ 18,000.00			
14	1485 Demolition					
15	1492 Moving to Work Demonstration					
16	1495.1 Relocation Costs	\$ 12,000.00	\$ 12,000.00			
17	1499 Development Activities ⁴					

¹ To be completed for the Performance and Evaluation Report.

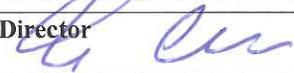
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 08/31/2011

Part I: Summary					
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: CT26-P001-5011 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant:2011 FFY of Grant Approval:	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 6/30/2012 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA	\$ 176,404.00	\$ 176,404.00		
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant:: (sum of lines 2 - 19)	\$ 3,418,124.00	\$ 3,418,124.00	\$ 1,020,316.09	\$ 331,758.28
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities	\$ 850,000.00			
23	Amount of line 20 Related to Security - Soft Costs	\$ 520,000.00	\$ 543,624.00	\$ 538,504.09	\$ 72,018.77
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director 		Date 10/26/12		Signature of Public Housing Director	
				Date	

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

Part II: Supporting Pages								
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: CT26-P001-50111 CFFP (Yes/ No): No Replacement Housing Factor Grant No:			Federal FFY of Grant: 2011			
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
Central Office	Management Improvements	1408	Lump sum	\$143,624.00	\$140,000.00	\$140,000.00	\$3,381.51	
	Technology Upgrades	1408	Lump sum	\$ 20,000.00				
	Administration	1410	Lump sum	\$341,812.00	\$341,812.00	\$341,812.00	\$256,358.00	
	Admin Office Improvements	1470	Lump sum	\$ 66,117.00	\$ 66,117.00			
CT00100002P	Operations	1406	Lump sum	\$ 48,830.00	\$ 48,830.00			
Aka Marina Village	A&E Services	1430	Lump sum	\$ 30,000.00	\$ 30,000.00			
	Site improvements – parking, drainage, fencing,	1450	Lump sum	\$ 50,000.00	\$ 50,000.00			
	Dwelling improvements – roofs, façade, heating, storm doors, 504 compliance	1501	Lump sum	\$ 72,050.00	\$ 72,050.00			
	Vacancy Reduction	1460	Lump sum	\$ 10,000.00	\$ 10,000.00			
	Relocation for VCA Compliance	1495	5 tenants	\$ 1,250.00	\$ 1,250.00			
	Dwelling equipment - boilers	1465	5 units	\$ 10,000.00	\$ 10,000.00			
CT00100005P	Operations	1406	Lump sum	\$ 48,830.00	\$ 48,830.00			
Aka PT Barnum Apts.	Vacancy Reduction	1460	Lump sum	\$ 10,000.00	\$ 10,000.00			
	Fire Suppression Devices	1460	Lump sum	\$ 50,000.00	\$ 50,000.00			
	Non-dwelling equipment	1475	1 vehicle	\$ 18,000.00	\$ 18,000.00			
	540/VCA Compliance	1501	Lump sum	\$ 22,050.00	\$ 22,050.00			
	Relocation for VCA Compliance	1495	Lump sum	\$ 2,500.00	\$ 2,500.00			

Continue to page 5

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

Part II: Supporting Pages								
PHA Name: Housing Authority of the City of Bridgeport			Grant Type and Number Capital Fund Program Grant No: CT26-P001-50111 CFFP (Yes/ No): No Replacement Housing Factor Grant No:			Federal FFY of Grant: 2011		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
CT00100006P	Operations	1406	Lump sum	\$ 48,830.00	\$48,830.00			
Aka Charles Greene	A&E Services	1430	Lump sum	\$ 50,000.00	\$50,000.00			
	Vacancy Reduction	1460	Lump sum	\$ 10,000.00	\$10,000.00			
	Heating pipe replacement	1465	Lump sum	\$ 36,000.00	\$36,000.00			
	504/VCA Compliance	1501	Lump sum	\$22,050.50	\$22,050.50			
	Relocation for VCA Compliance	1495	4 tenants	\$ 1,000.00	\$ 1,000.00			
	Front Entrance Lighting and Security	1460	Lump sum	\$ 34,000.00	\$ 34,000.00			
CT00100007P	Operations	1406	Lump sum	\$ 48,830.00	\$ 48,830.00			
Aka Fireside Apts	Management Improvements – Security	1408	Lump sum	\$120,000.00	\$118,000.00	\$116,186.22	\$ 6,186.22	
	A & E Services	1430	Lump sum	\$ 20,000.00	\$ 20,000.00			
	Vacancy Reduction	1460	Lump sum	\$ 10,000.00	\$ 10,000.00			
	Gutters, downspouts, Roofs	1460	Lump sum	\$ 37,343.00	\$ 37,343.00			
	Site improvements including sewer	1450	Lump sum	\$ 25,000.00	\$ 25,000.00			
	504/VCA Compliance	1501	Lump sum	\$ 22,050.50	\$ 22,050.50			
	Relocation for VCA Compliance	1495	12 tenants	\$ 1,250.00	\$ 1,250.00			
	Community Room Roofs and Doors	1470	2 bldgs.	\$ 40,000.00	\$ 40,000.00			
CT00100009P	Operations	1406	Lump sum	\$ 48,830.00	\$ 48,830.00			
Aka Harborview Towers	Management Improvements-Security	1408	Lump sum	\$200,000.00	\$195,000.00	\$192,223.67	\$ 32,223.67	
	A & E Services	1430	Lump sum	\$ 25,000.00	\$ 25,000.00			

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

Part II: Supporting Pages								
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: CT26-P001-50111 CFFP (Yes/ No): No Replacement Housing Factor Grant No:			Federal FFY of Grant: 2011			
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
CT00100009P	Vacancy Reduction	1460	Lump sum	\$ 10,000.00	\$10,000.00			
	Building exterior improvements (masonry)	1460	Lump sum	\$ 50,000.00	\$ 50,000.00			
	Heating piping replacement	1465	Lump sum	\$ 50,000.00	\$50,000.00			
	504/VAC Compliance	1501	Lump sum	\$ 22,050.50	\$22,050.00			
	Relocation for VCA Compliance	1495	5 tenants	\$ 3,000.00	\$ 3,000.00			
	Parking Renovations	1465	Lump sum	\$100,000.00	\$100,000.00			
CT00100044P	Operations	1406	Lump sum	\$ 48,830.00	\$ 48,830.00			
Aka Trumbull Gardens	Management Improvements – security	1408	Lump sum	\$200,000.00	\$230,624.00	\$230,094.20	\$ 33,608.88	
	A & E Services	1430	Lump sum	\$ 65,000.00	\$ 65,000.00			
	Bldg 10/11 Roof/Drain Replacement	1460	Lump sum	\$ 10,000.00	\$ 10,000.00			
	Vacancy Reduction	1460	Lump sum	\$ 10,000.00	\$ 10,000.00			
	Grounds Improvement – parking, drainage, fencing,	1450	Lump sum	\$ 50,000.00	\$50,000.00			
	Relocation	1495	4 tenants	\$ 1,000.00	\$ 1,000.00			
	Electrical Meter Replacement	1465	Lump sum	\$200,000.00	\$200,000.00			
	504/VCA Compliance	1501	Lump sum	\$ 22,050.50	\$ 22,050.50			
	Heating piping replacement & DHW boiler repl.	1465	Lump sum	\$ 60,000.00	\$ 60,000.00			
	Unit boilers	1465	Lump sum	\$ 20,000.00	\$ 20,000.00			
	Elevators	1465	Lump sum	\$100,000.00	\$100,000.00			
CT001000881P	Operations	1406	Lump sum	\$ 24,415.00	\$ 24,415.00			
Aka Scattered Site I	A & E Services	1430	Lump sum	\$ 30,000.00	\$30,000.00			

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

Part II: Supporting Pages								
PHA Name: Housing Authority of the City of Bridgeport			Grant Type and Number Capital Fund Program Grant No: CT26-P001-50111 CFFP (Yes/ No): No Replacement Housing Factor Grant No:			Federal FFY of Grant: 2011		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
CT001000881P	Site improvements - parking, drainage, fencing	1450	Lump sum	\$46,000.00	\$46,000.00			
	Building improvements - roofs, siding, façade, gutters/downspouts, storm doors, intercom, windows, structural at Stratford Ave.	1460	Lump sum	\$200,000.00	\$200,000.00			
	Vacancy Reduction	1460	Lump sum	\$ 10,000.00	\$ 10,000.00			
	504/VCA Compliance	1501	Lump sum	\$ 22,050.50	\$ 22,050.50			
	Relocation for VCA Compliance	1495	3 tenants	\$ 1,250.00	\$ 1,250.00			
CT001000882P	Operations	1406	Lump sum	\$ 24,416.00	\$ 24,416.00			
Aka Scattered Site II	A&E Services	1430	Lump sum	\$ 30,000.00	\$30,000.00			
	Site improvements – parking, drainage, fencing	1450	Lump sum	\$ 30,013.00	\$ 30,010.00			
	Building improvements – roofs, siding, façade, gutter/downspouts, storm doors, intercom, windows	1460	Lump sum	\$200,000.00	\$200,000.00			
	Vacancy Reduction	1460	Lump sum	\$ 10,000.00	\$ 10,000.00			
	504/VCA Compliance	1501	Lump sum	\$ 22,050.50	\$ 22,050.50			
	Relocation for VCA Compliance	1495	3 tenants	\$ 750.00	\$ 750.00			
			Total	\$3,418,124.00	#####	\$1,020,316.09	\$ 331,758.28	

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

Part III: Implementation Schedule for Capital Fund Financing Program					
PHA Name: Housing Authority of the City of Bridgeport				Federal FFY of Grant: 2011	
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
Central Office	9/30/2013		9/30/2015		
BHA Wide	9/30/2013		9/30/2015		
CT00100002P	9/30/2013		9/30/2015		
CT00100005P	9/30/2013		9/30/2015		
CT00100006P	9/30/2013		9/30/2015		
CT00100007P	9/30/2013		9/30/2015		
CT00100009P	9/30/2013		9/30/2015		
CT00100044P	9/30/2013		9/30/2015		
CT00100881P	9/30/2013		9/30/2015		
CT00100882P	9/30/2013		9/30/2015		

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Part I: Summary					
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: CT26-P001-50110 Replacement Housing Factor Grant No: Date of CFFC:		FFY of Grant: 2010 FFY of Grant Approval:	
Type of Grant <input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Revised Annual Statement (revision no. 2) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 6/30/2012 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1	
		Original	Revised 2	Obligated	Expended
1	Total non-CFFP Funds				
2	1406 Operations (may not exceed 20% of line 21)	\$ 393,057.00	\$ 393,057.00	\$ 393,057.00	\$ -
3	1408 Management Improvements	\$ 786,533.00	\$ 789,424.33	\$ 789,424.33	\$ 745,399.17
4	1410 Administration (may not exceed 10% of line 21)	\$ 393,059.00	\$ 394,712.00	\$ 394,712.00	\$ 394,712.00
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	\$ 250,000.00	\$ 367,037.72	\$ 367,037.72	\$ 106,113.72
8	1440 Site Acquisition				
9	1450 Site Improvements	\$ 236,249.00	\$ 478,624.98	\$ 478,624.98	\$ 289,942.11
10	1460 Dwelling Structures	\$ 1,134,107.00	\$ 1,408,310.20	\$ 1,408,310.20	\$ 382,393.58
11	1465.1 Dwelling Equipment - Nonexpendable	\$ 30,000.00	\$ 8,135.00	\$ 8,135.00	\$ 8,135.00
12	1470 Non Dwelling Structures	\$ 91,117.00	\$ 48,931.00	\$ 48,931.00	\$ 295.00
13	1475 Non Dwelling Equipment	\$ 18,000.00	\$ 39,889.77	\$ 39,889.77	\$ 32,374.77
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs	\$ 15,000.00	\$ 19,000.00	\$ 19,000.00	\$ 13,105.50
17	1499 Development Activities 4				

1 To be completed for the Performance and Evaluation Report.
 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
 3 PHA's with under 250 units in management may use 100% of CFFP grant for operations.
 4 RHF funds shall be included here

Part I: Summary

PHA Name: Housing Authority of the City of Bridgeport	Grant Type and Number Capital Fund Program Grant No: CT26-P001-50110 Replacement Housing Factor Grant No: Date of CFPP:	FFY of Grant: 2010 FFY of Grant Approval:
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Type of Grant

Original Annual Statement
 Revised Annual Statement (revision no. 2)
 Performance and Evaluation Report for Period Ending: 6/30/2012
 Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1	
		Original	Revised 2	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA	\$ 600,000.00	\$ -	\$ -	\$ -
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment:				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant; (sum of lines 2-19)	\$ 3,947,122.00	\$ 3,947,122.00	\$ 3,947,122.00	\$ 1,972,470.85
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities	\$ 850,000.00	\$ 1,452,585.62	\$ 1,452,585.62	\$ 427,433.45
23	Amount of line 20 Related to Security - Soft Costs	\$ 520,000.00	\$ 686,867.56	\$ 686,867.56	\$ 685,911.05
24	Amount of line 20 Related to Security - Hard Costs	\$ -	\$ -	\$ -	\$ -
25	Amount of line 20 Related to Energy Conservation Measures	\$ -	\$ 214,127.99	\$ 214,127.99	\$ 100,354.00
Signature of Executive Director		Date: 7/17/12		Signature of Public Housing Director	

1 To be completed for the Performance and Evaluation Report.
 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
 3 PHA's with under 250 units in management may use 100% of CFP grant for operations.
 4 RHF funds shall be included here

Part II: Supporting Pages									
PHA Name: Housing Authority of the City of Bridgeport			Grant Type and Number Capital Fund Program Grant No: CT26-P001-50110 CFPP (Yes/No) No Replacement Housing Factor Grant No.				FFY of Grant: 2010 FFY of Grant Approval:		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work	
				Original	Revised 1	Funds Obligated 2	Funds Expended		
Central Office	Management Improvements	1408	Lump sum	\$216,533.00	\$569.00	\$569.00	\$0.00	0%	
	Technology Upgrades	1408	Lump sum	\$50,000.00	\$4,335.00	\$4,335.00	\$4,335.00	100%	
	Administration	1410	Lump sum	\$393,059.00	\$394,712.00	\$394,712.00	\$394,712.00	100%	
	CFPP for 504/VCA Compliance	1501	Lump sum	\$600,000.00					
	Admin Office Improvements	1490	Lump sum	\$66,117.00					
	Non-dwelling equipment	1475	Lump sum	\$0.00	\$8,004.97	\$8,004.97	\$884.97	11%	
CT00100002P	Operations	1406	Lump sum	\$56,151.00	\$56,151.00	\$56,151.00	\$0.00		
aka Marina Village	Management Improvements	1408	Lump sum	\$0.00	\$40,761.23	\$40,761.23	\$14,475.49	36%	
	A & B Services	1430	Lump sum	\$30,000.00	\$74,688.22	\$74,688.22	\$26,548.51	36%	
	Site improvements - parking, drainage, fencing	1450	Lump sum	\$50,000.00					
	Dwelling improvements - roofs, facade, heating, storm doors	1460	Lump sum	\$50,000.00	\$3,190.00	\$3,190.00	\$1,770.00	55%	
	Vacancy Reduction	1460	Lump sum	\$23,077.00	\$68,496.70	\$68,496.70	\$15,341.35	22%	
	Dwelling equipment - boilers	1465	5 units	\$10,000.00					
	Non-dwelling equipment	1475	Lump sum	\$0.00	\$395.00	\$395.00	\$0.00	0%	
	Relocation for VCA Compliance	1495	5 tenants	\$1,250.00	\$16,000.00	\$16,000.00	\$12,757.50	80%	
CT00100005P	Operations	1406	Lump sum	\$56,151.00	\$56,151.00	\$56,151.00	\$0.00		
aka PT Barnum Apts	Management Improvements	1408		\$0.00	\$9,763.70	\$9,763.70	\$6,981.07	72%	
	A & B Services	1430	Lump sum	\$0.00	\$56,120.99	\$56,120.99	\$12,386.06	22%	
	Grounds Improvements	1450	Lump sum	\$0.00	\$47,000.00	\$47,000.00	\$6,197.85	13%	
	Vacancy Reduction/Fire Suppression Device	1460	Lump sum	\$23,078.00	\$4,882.60	\$4,882.60	\$923.79	19%	
	Facility Improvements	1470	Lump sum	\$0.00	\$1,588.00	\$1,588.00	\$295.00	19%	
	Non-dwelling equipment	1475	1 vehicle	\$18,000.00					
	Relocation for VCA Compliance	1495	10 tenants	\$2,500.00					
CT00100006P	Operations	1406	Lump sum	\$56,151.00	\$56,151.00	\$56,151.00	\$0.00		
aka Charles Greene	Management Improvements	1408		\$0.00	\$7,319.38	\$7,319.38	\$5,233.38	72%	
	A & B Services	1430	Lump sum	\$50,000.00	\$19,256.60	\$19,256.60	\$4,503.79	23%	
	Site Improvements - parking, drainage, fencing, bollards	1450	Lump sum	\$15,000.00	\$37,447.59	\$37,447.59	\$0.00	0%	
	Vacancy Reduction	1460	Lump sum	\$23,077.00	\$20,104.50	\$20,104.50	\$692.52	3%	
	Facility Improvements	1470	Lump sum	\$0.00	\$43,285.00	\$43,285.00	\$0.00	0%	
	Non-dwelling equipment	1475	1 vehicle	\$0.00	\$31,489.80	\$31,489.80	\$31,489.80	100%	
	Relocation for VCA Compliance	1495	4 tenants	\$1,000.00					

continued to page 4

1 To be completed for the Performance and Evaluation Report.

2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement

Annual Statement/Performance Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part II: Supporting Pages								
PHA Name: Housing Authority of the City of Bridgeport			Grant Type and Number Capital Fund Program Grant No: CT26-F091-50110				FFY of Grant: 2010	
			CFFP (Yes/No) No Replacement Housing Factor Grant No.				FFY of Grant Approval:	
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised 1	Funds Obligated 2	Funds Expended	
CT00100007P	Operations	1406	Lump sum	\$56,151.00	\$56,151.00	\$56,151.00		
aka Fireside Apts	Management Improvements - Security	1408	Lump sum	\$120,000.00	\$133,525.84	\$133,525.84	\$131,424.37	98%
	A & E Services	1430	Lump sum	\$20,000.00	\$37,948.24	\$37,948.24	\$14,895.03	39%
	Grounds Improvements	1450	Lump sum	\$25,000.00	\$9,418.00	\$9,418.00	\$9,418.00	100%
	Vacancy Reduction	1460	Lump sum	\$23,077.00	\$36,690.46	\$36,690.46	\$33,742.22	92%
	Gutters, Downspouts, Roofs, Insulation, Individual boilers, Doors	1460	Lump sum	\$37,343.00	\$189,938.83	\$189,938.83	\$128,914.76	68%
	Dwelling equipment - boilers	1465	Lump sum	\$0.00	\$8,135.00	\$8,135.00	\$8,135.00	100%
	Relocation for VCA Compliance	1495	12 tenants	\$1,250.00	\$2,000.00	\$2,000.00	\$348.00	17%
CT00100009P	Operations	1406	Lump sum	\$56,151.00	\$56,151.00	\$56,151.00	\$0.00	0%
aka Harborview Towers	Management Improvements - Security	1408	Lump sum	\$200,000.00	\$265,403.54	\$265,403.54	\$263,549.74	99%
	A & E Services	1430	Lump sum	\$25,000.00	\$14,446.96	\$14,446.96	\$2,669.41	18%
	Grounds Improvements	1450	Lump sum	\$0.00	\$384,759.39	\$384,759.39	\$274,326.26	71%
	Vacancy Reduction	1460	Lump sum	\$23,077.00	\$13,541.35	\$13,541.35	\$4,591.43	34%
	Roof Replacement	1460	Lump sum	\$380,000.00				
	Relocation for VCA Compliance	1495	5 tenants	\$3,000.00				
CT00100044P	Operations	1406	Lump sum	\$56,151.00	\$56,151.00	\$56,151.00	\$0.00	
aka Trumbull Gardens	Management Improvements - Security	1408	Lump sum	\$200,000.00	\$313,039.98	\$313,039.98	\$308,884.81	99%
	A & E Services	1430	Lump sum	\$65,000.00	\$90,354.71	\$90,354.71	\$23,046.59	26%
	Grounds Improvements - parking, drainage, fencing	1450	Lump sum	\$50,000.00				
	Roof Drain Replacement	1460	Lump sum	\$10,000.00	\$1,900.00	\$1,900.00	\$0.00	0%
	Elevator Replacement	1460	Lump sum	\$0.00	\$794,831.50	\$794,831.50	\$91,893.04	12%
	Vacancy Reduction	1460	Lump sum	\$23,077.00	\$45,930.19	\$45,930.19	\$41,141.00	90%
	Unit boilers	1465	10 units	\$20,000.00				
	Office Improvements	1470	Lump sum	\$25,000.00	\$4,058.00	\$4,058.00	\$0.00	0%
	Non-dwelling equipment	1475		\$0.00				
	Relocation for VCA Compliance	1495	Lump sum	\$4,000.00				

continued to page 5

1 To be completed for the Performance and Evaluation Report.

2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement

Part I: Summary	
PHA Name: Housing Authority of the City of Bridgeport	Grant Type and Number Capital Fund Program Grant No: CT26-P001-50109 Replacement Housing Factor Grant No: Date of CFFP:
	FFY of Grant: 2009 FFY of Grant Approval:

Type of Grant

Original Annual Statement
 Revised Annual Statement (revision no. 4)

Performance and Evaluation Report for Period Ending: 6/30/2012
 Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1	
		Original	Revised 2	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) 3	\$ 349,400.00	\$ 349,000.00	\$ 349,000.00	\$ 349,000.00
3	1408 Management Improvements	\$ 755,336.00	\$ 779,701.52	\$ 779,701.52	\$ 779,701.52
4	1410 Administration (may not exceed 10% of line 21)	\$ 393,059.00	\$ 393,058.00	\$ 393,058.00	\$ 393,058.00
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	\$ 300,000.00	\$ 155,156.59	\$ 155,156.59	\$ 130,420.71
8	1440 Site Acquisition				
9	1450 Site Improvements	\$ 96,249.00	\$ 93,100.66	\$ 93,100.66	\$ 91,710.33
10	1460 Dwelling Structures	\$ 736,545.00	\$ 1,683,575.96	\$ 1,683,575.96	\$ 1,130,897.92
11	1465.1 Dwelling Equipment - Nonexpendable	\$ 610,000.00	\$ 113,295.36	\$ 113,295.36	\$ 110,021.46
12	1470 Non Dwelling Structures	\$ 25,000.00	\$ 259,923.76	\$ 259,923.76	\$ 230,077.77
13	1475 Non Dwelling Equipment	\$ -	\$ 95,555.65	\$ 95,555.65	\$ 95,555.65
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs	\$ 15,000.00	\$ 8,221.50	\$ 8,221.50	\$ 8,221.50
17	1499 Development Activities 4				

1 To be completed for the Performance and Evaluation Report.

2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement

3 PHA's with under 250 units in management may use 100% of CFP grant for operations.

4 RHF funds shall be included here

Part I: Summary

PHA Name: Housing Authority of the City of Bridgeport	Grant Type and Number	FFY of Grant: 2009
	Capital Fund Program Grant No: CT26-P001-50109	FFY of Grant Approval:
	Replacement Housing Factor Grant No:	
	Date of CFFP:	

Type of Grant

<input type="checkbox"/> Original Annual Statement	<input checked="" type="checkbox"/> Revised Annual Statement (revision no. 4)
<input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 6/30/2012	<input type="checkbox"/> Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised 2	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA	\$ 650,000.00	\$ -	\$ -	\$ -
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2-19)	\$ 3,930,589.00	\$ 3,930,589.00	\$ 3,930,589.00	\$ 3,318,664.86
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities	\$ 850,000.00	\$ 799,923.72	\$ 799,923.72	\$ 281,328.14
23	Amount of line 20 Related to Security - Soft Costs	\$ 520,000.00	\$ 555,578.40	\$ 555,578.40	\$ 555,578.40
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures	\$ 396,000.00	\$ 298,601.65	\$ 298,601.65	\$ 291,988.38

Signature of Executive Director		Date	7/17/12	Signature of Public Housing Director	Date:
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- 1 To be completed for the Performance and Evaluation Report.
- 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
- 3 PHA's with under 250 units in management may use 100% of CFP grant for operations.
- 4 RHF funds shall be included here

Part II: Supporting Pages								
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: CT26-P001-50109 CFFP (Yes/No) No Replacement Housing Factor Grant No.					FFY of Grant: 2009 FFY of Grant Approval:	
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised 1	Funds Obligated	Funds Expended	
Central Office	Management Improvements	1408	Lump sum	\$ 235,336.00	\$ 18,358.14	\$ 18,358.14	\$ 18,358.14	100%
Central Office	Administration	1410	Lump sum	\$ 393,059.00	\$ 393,058.00	\$ 393,058.00	\$ 393,058.00	100%
Central Office	Non-dwelling structures	1470	Lump sum	\$ -	\$ 6,333.60	\$ 6,333.60	\$ 6,333.60	100%
Central Office	Non-dwelling equipment	1475	Lump sum	\$ -	\$ 6,754.00	\$ 6,754.00	\$ 6,754.00	100%
Central Office	CFFP for 504/VCA Compliance	1501	Lump sum	\$ 650,000.00	\$ -	\$ -	\$ -	
CT00100002P Marina	Operations	1406	Lump sum	\$ 49,914.00	\$ 49,857.00	\$ 49,857.00	\$ 49,857.00	100%
CT00100002P Marina	Management Improvements	1408	Lump sum	\$ 30,000.00	\$ 27,629.59	\$ 27,629.59	\$ 27,629.59	100%
CT00100002P Marina	A & E Services	1430	Lump sum	\$ 30,000.00	\$ -	\$ -	\$ -	
CT00100002P Marina	Site improvements - parking, drainage	1450	Lump sum	\$ 50,000.00	\$ -	\$ -	\$ -	
CT00100002P Marina	Dwelling improvements - roofs, façade,	1460	Lump sum	\$ 50,000.00	\$ 108,213.00	\$ 108,213.00	\$ 107,093.00	99%
CT00100002P Marina	Vacancy Reduction	1460	Lump sum	\$ 23,077.00	\$ 2,725.00	\$ 2,725.00	\$ 2,725.00	100%
CT00100002P Marina	504/VCA compliance	1460	Lump sum	\$ -	\$ 28,731.98	\$ 28,731.98	\$ 28,731.92	100%
CT00100002P Marina	Relocation for VCA Compliance	1495	5 tenants	\$ 1,250.00	\$ 2,746.00	\$ 2,746.00	\$ 2,746.00	100%
CT00100002P Marina	Non-dwelling equipment	1475	1 copier	\$ -	\$ 14,025.00	\$ 14,025.00	\$ 14,025.00	0%
CT00100005P PT	Operations	1406	Lump sum	\$ 49,915.00	\$ 49,857.00	\$ 49,857.00	\$ 49,857.00	100%
CT00100005P PT	Management Improvements	1408	Lump sum	\$ 30,000.00	\$ 22,452.31	\$ 22,452.31	\$ 22,452.31	100%
CT00100005P PT	A & E Services	1430	Lump sum	\$ -	\$ 11,218.02	\$ 11,218.02	\$ 11,218.02	100%
CT00100005P PT	Grounds Improvements	1450	Lump sum	\$ -	\$ 6,979.26	\$ 6,979.26	\$ 5,638.93	81%
CT00100005P PT	504/VCA compliance	1460	Lump sum	\$ 23,078.00	\$ 200,027.00	\$ 200,027.00	\$ 180,024.30	90%
CT00100005P PT	Dwelling Improvements	1460	Lump sum	\$ -	\$ 183,396.00	\$ 183,396.00	\$ 169,606.34	92%
CT00100005P PT	Non-dwelling structures	1470	Lump sum	\$ -	\$ 222,830.59	\$ 222,830.59	\$ 196,578.60	88%
CT00100005P PT	Non-dwelling equipment	1475	Lump sum	\$ -	\$ 22,645.00	\$ 22,645.00	\$ 22,645.00	100%
CT00100005P PT	Relocation for VCA Compliance	1495	10 tenants	\$ 2,500.00	\$ 5,475.50	\$ 5,475.50	\$ 5,475.50	100%
CT00100006P Greene	Operations	1406	Lump sum	\$ 49,915.00	\$ 49,857.00	\$ 49,857.00	\$ 49,857.00	100%
CT00100006P Greene	Management Improvements	1408	Lump sum	\$ -	\$ 49,427.85	\$ 49,427.85	\$ 49,427.85	100%
CT00100006P Greene	A & E Services	1430	Lump sum	\$ 50,000.00	\$ 6,187.50	\$ 6,187.50	\$ 4,937.50	80%

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1 To be completed for the Performance and Evaluation Report.

2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement

Part II: Supporting Pages								
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: CT26-P001-50109 CFFP (Yes/No) No Replacement Housing Factor Grant No.				FFY of Grant: 2009 FFY of Grant Approval:		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised 1	Funds Obligated	Funds Expended	
CT00100006P Greene.	Grounds improvements	1450	Lump sum	\$ -	\$ 13,054.50	\$ 13,054.50	\$ 13,054.50	100%
CT00100006P Greene	Building improvements and CCTV	1460	Lump sum	\$ 15,000.00	\$ 97,319.65	\$ 97,319.65	\$ 97,319.65	100%
CT00100006P Greene	Vacancy Reduction	1460	Lump sum	\$ 23,077.00	\$ -	\$ -		
CT00100006P Greene	Dwelling equipment - laundry	1465	Lump sum	\$ 10,000.00	\$ 77,058.96	\$ 77,058.96	\$ 76,964.00	100%
CT00100006P Greene	Non-dwelling improvements	1470	Lump sum	\$ -	\$ 77.57	\$ 77.57	\$ 77.57	100%
CT00100006P Greene	Non-dwelling equipment	1475	Lump sum	\$ -	\$ 17,407.00	\$ 17,407.00	\$ 17,407.00	100%
CT00100006P Greene	Relocation for VCA Compliance	1495	4 tenants	\$ 1,000.00	\$ -	\$ -	\$ -	
CT00100007P Fireside	Operations	1406	Lump sum	\$ 49,914.00	\$ 49,857.00	\$ 49,857.00	\$ 49,857.00	100%
CT00100007P Fireside	Management Improvements - Security	1408	Lump sum	\$ 120,000.00	\$ 148,261.93	\$ 148,261.93	\$ 148,261.93	100%
CT00100007P Fireside	A & E Services	1430	Lump sum	\$ 20,000.00	\$ 3,078.20	\$ 3,078.20	\$ 3,078.20	100%
CT00100007P Fireside	Grounds improvements	1450	Lump sum	\$ -	\$ -	\$ -	\$ -	
CT00100007P Fireside	Vacancy Reduction	1460	Lump sum	\$ 23,077.00	\$ 6,790.00	\$ 6,790.00	\$ 6,790.00	100%
CT00100007P Fireside	504/VCA Compliance	1460	Lump sum	\$ -	\$ 1,010.97	\$ 1,010.97	\$ 1,010.97	100%
CT00100007P Fireside	Dwelling improvements	1460	Lump sum	\$ -	\$ 90,045.49	\$ 90,045.49	\$ 88,981.16	99%
CT00100007P Fireside	Building System Improvements	1465	Lump sum	\$ -	\$ 6,763.00	\$ 6,763.00	\$ 3,584.06	53%
CT00100007P Fireside	Clinic at Forest Green	1470	Lump sum	\$ 25,000.00	\$ -	\$ -		
CT00100007P Fireside	Non-dwelling equipment	1475	1 gator	\$ -	\$ 14,025.00	\$ 14,025.00	\$ 14,025.00	100%
CT00100007P Fireside	Relocation for VCA Compliance	1495	12 tenants	\$ 1,250.00	\$ -	\$ -		
CT00100009P Harborview	Operations	1406	Lump sum	\$ 49,914.00	\$ 49,857.00	\$ 49,857.00	\$ 49,857.00	100%
CT00100009P Harborview	Management Improvements - Security	1408	Lump sum	\$ 200,000.00	\$ 211,419.85	\$ 211,419.85	\$ 211,419.85	100%
CT00100009P Harborview	A & E Services	1430	Lump sum	\$ 75,000.00	\$ 73,222.96	\$ 73,222.96	\$ 61,485.41	84%
CT00100009P Harborview	Grounds improvements	1450	Lump sum	\$ -	\$ 9,729.90	\$ 9,729.90	\$ 9,729.90	100%
CT00100009P Harborview	Vacancy Reduction	1460	Lump sum	\$ 23,077.00	\$ 516.57	\$ 516.57	\$ 516.57	100%
CT00100009P Harborview	Building System Improvements	1465	Lump sum	\$ -	\$ 6,500.00	\$ 6,500.00	\$ 6,500.00	100%
CT00100009P Harborview	Relocation for VCA Compliance	1495	5 tenants	\$ 3,000.00	\$ -	\$ -		
CT00100044P Trumbull	Operations	1406	Lump sum	\$ 49,914.00	\$ 49,857.00	\$ 49,857.00	\$ 49,857.00	100%
CT00100044P Trumbull	Management Improvements - Security	1408	Lump sum	\$ 200,000.00	\$ 268,332.87	\$ 268,332.87	\$ 268,332.87	100%
CT00100044P Trumbull	A & E Services	1430	Lump sum	\$ 65,000.00	\$ 24,047.50	\$ 24,047.50	\$ 21,899.17	91%
CT00100044P Trumbull	Grounds improvements	1450	Lump sum	\$ -	\$ 10,550.00	\$ 10,550.00	\$ 10,500.00	100%
CT00100044P Trumbull	Dwelling improvements	1460	Lump sum	\$ 10,000.00	\$ 77,991.00	\$ 77,991.00	\$ 77,991.00	100%
CT00100044P Trumbull	504/VCA Compliance	1460	Lump sum	\$ -	\$ 495,527.88	\$ 495,527.88	\$ 5,287.88	1%

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Annual Statement/Performance Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

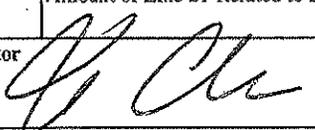
Part II: Supporting Pages								
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: CT26-P001-50109 CFFP (Yes/No) No Replacement Housing Factor Grant No.				FFY of Grant: 2009 FFY of Grant Approval:		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised 1	Funds Obligated	Funds Expended	
CT00100044P Trumbull	Vacancy Reduction	1460	Lump sum	\$ 23,077.00	\$ 48,950.00	\$ 48,950.00	\$ 46,288.13	95%
CT00100044P Trumbull	Building System Improvements	1465	Lump sum	\$ -	\$ 22,973.40	\$ 22,973.40	\$ 22,973.40	100%
CT00100044P Trumbull	Building 11 Elevators	1465	Lump sum	\$ 550,000.00	\$ -	\$ -	\$ -	
CT00100044P Trumbull	Non-dwelling improvements	1470	Lump sum	\$ -	\$ 30,682.00	\$ 30,682.00	\$ 27,088.00	88%
CT00100044P Trumbull	Non-dwelling equipment	1475	Lump sum	\$ -	\$ 20,699.65	\$ 20,699.65	\$ 20,699.65	100%
CT00100044P Trumbull	Relocation for VCA Compliance	1495	Lump sum	\$ 4,000.00	\$ -	\$ -		
CT001000881P	Operations	1406	Lump sum	\$ 24,957.00	\$ 24,928.00	\$ 24,928.00	\$ 24,928.00	100%
CT001000881P	Management Improvements	1408	Lump sum	\$ 30,000.00	\$ 14,536.23	\$ 14,536.23	\$ 14,536.23	100%
CT001000881P	A & E Services	1430	Lump sum	\$ 30,000.00	\$ 37,402.41	\$ 37,402.41	\$ 27,802.41	74%
CT001000881P	Site improvements - parking, drainage	1450	Lump sum	\$ 21,000.00	\$ -	\$ -	\$ -	
CT001000881P	Building improvements - roofs, siding,	1460	Lump sum	\$ 250,000.00	\$ 111,193.80	\$ 111,193.80	\$ 91,164.00	82%
CT001000881P	Vacancy Reduction	1460	Lump sum	\$ 11,541.00				
CT001000881P	504/VCA Compliance	1460	Lump sum	\$ -	\$ 4,011.87	\$ 4,011.87	\$ 3,617.15	90%
CT001000881P	Poplar Street Elevator	1465	1 building	\$ 50,000.00	\$ -	\$ -		
CT001000881P	Relocation for VCA Compliance	1495	Lump sum	\$ 1,250.00	\$ -			
CT001000882P	Operations	1406	Lump sum	\$ 24,957.00	\$ 24,930.00	\$ 24,930.00	\$ 24,930.00	100%
CT001000882P	Management Improvements	1408	Lump sum	\$ 30,000.00	\$ 19,282.75	\$ 19,282.75	\$ 19,282.75	100%
CT001000882P	A & E Services	1430	Lump sum	\$ 30,000.00				
CT001000882P	Site improvements - parking, drainage	1450	Lump sum	\$ 25,249.00	\$ 52,787.00	\$ 52,787.00	\$ 52,787.00	100%
CT001000882P	Building improvements - roofs, siding,	1460	Lump sum	\$ 250,000.00	\$ 127,201.00	\$ 127,201.00	\$ 127,201.00	100%
CT001000882P	Vacancy Reduction	1460	Lump sum	\$ 11,541.00	\$ 88,260.30	\$ 88,260.30	\$ 84,885.40	96%
CT001000882P	504/VCA Compliance	1460	Lump sum	\$ -	\$ 11,664.45	\$ 11,664.45	\$ 11,664.45	100%
CT001000882P	Relocation for VCA Compliance	1495	3 tenants	\$ 750.00				
			Total	\$ 4,050,589.00	\$ 3,435,061.12	\$ 3,435,061.12	\$ 3,318,664.86	97%

1 To be completed for the Performance and Evaluation Report.

2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement

Part I: Summary					
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: CT26-P001-50108 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant: 2008 FFY of Grant Approval: 2008	
Type of Grant					
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no. 1) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input checked="" type="checkbox"/> Final Performance and Evaluation Report					
Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1	
		Original	Revised 2	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations	254,000.00	254,000.00	254,000.00	254,000.00
3	1408 Operations (may not exceed 20% of line 21)	812,536.00	812,536.00	812,536.00	812,536.00
4	1410 Administration	397,409.00	406,268.00	406,268.00	406,268.00
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	370,000.00	257,333.93	257,333.93	257,333.93
8	1440 Site Acquisition				
9	1450 Site Improvements	400,000.00	1,440,954.28	1,440,954.28	1,440,954.28
10	1460 Dwelling Structures	1,652,738.00	383,256.40	383,256.40	383,256.40
11	1465.1 Dwelling Equipment	0.00	33,013.50	33,013.50	33,013.50
12	1470 Non Dwelling Structures	75,000.00	37,415.23	37,415.23	37,415.23
13	1475 Non Dwelling Equipment	50,000.00	435,884.66	435,884.66	435,884.66
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs	15,000.00	2,021.00	2,021.00	2,021.00
17	1499 Development Activities 4				

1 To be completed for the Performance and Evaluation Report.
 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
 3 PHA's with under 250 units in management may use 100% of CFP grant for operations.
 4 RHF funds shall be included here

Part I: Summary					
PHA Name: Housing Authority of the City of Bridgeport	Grant Type and Number Capital Fund Program Grant No: CT26-P001-50108 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: 2008 FFY of Grant Approval: 2008			
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no. 1) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input checked="" type="checkbox"/> Final Performance and Evaluation Report					
Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1	
		Original	Revised 2	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18b	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency				
20	Amount of Annual Grant: (sum of line 2-20)	4,026,683.00	4,062,683.00	4,062,683.00	4,062,683.00
21	Amount of Line 21 Related to LBP Activities	0.00	0.00	0.00	0.00
22	Amount of Line 21 Related to Section 504 Compliance	1,646,511.00	660,482.22	660,482.22	660,482.22
23	Amount of Line 21 Related to Security - Soft Costs	520,000.00	413,064.06	413,064.06	413,064.06
24	Amount of Line 21 Related to Security - Hard Costs	200,000.00	0.00	0.00	0.00
25	Amount of Line 21 Related to Energy Conservation Measures	60,000.00	397,034.73	397,034.73	397,034.73
Signature of Executive Director 		Date: 7/14/12		Signature of Public Housing Director _____	
				Date _____	

1 To be completed for the Performance and Evaluation Report.
 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
 3 PHA's with under 250 units in management may use 100% of CFF grant for operations.
 4 RHF funds shall be included here

Part II: Supporting Documents								
PHA Name: Bridgeport Housing Authority		Grant Type and Number Capital Fund Program Grant No: CT26-P001-50108 CFFP (Yes/No): No Replacement Housing Factor Grant No:				Federal FFY of Grant: 2008		
Development Number Name/HA-Wide Activities	General Description of Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised 1	Funds Obligated 2	Funds Expended 2	
Central Office	Operations	1406	Lump sum	\$31,750.00	\$0.00			
Central Office	504/VCA Compliance	1408	Lump sum	\$25,000.00	\$0.00			
Central Office	Management Improvements - Procurement	1408	Lump sum	\$22,200.00	\$0.00			
Central Office	Management Improvements	1408	Lump sum	\$85,336.00	\$296,411.35	\$296,411.35	\$296,411.35	100%
Central Office	Staff Training	1408	Lump sum	\$30,000.00	\$0.00	\$0.00		
Central Office	Resident Programs	1408	Lump sum	\$30,000.00	\$0.00	\$0.00		
Central Office	Technology Upgrades	1408	Lump sum	\$100,000.00	\$16,290.00	\$16,290.00	\$16,290.00	100%
Central Office	Administrative Salaries	1410	Lump sum	\$397,409.00	\$406,268.00	\$406,268.00	\$406,268.00	100%
Central Office	A & E Services	1430	Lump sum	\$65,000.00	\$5,489.43	\$5,489.43	\$5,489.43	100%
Central Office	Facility Improvements	1470	Lump sum	\$50,000.00	\$2,946.00	\$2,946.00	\$2,946.00	100%
Central Office	504/VCA Compliance	1470	Lump sum	\$25,000.00	\$0.00	\$0.00		
Central Office	Non-dwelling equipment	1475	Lump sum	\$25,000.00	\$171,128.89	\$171,128.89	\$171,128.89	100%
Central Office	Relocation	1495	Lump sum	\$15,000.00	\$0.00	\$0.00	\$0.00	
CT001000002P Marina Village	Operations	1406	Lump sum	\$31,750.00	\$36,286.00	\$36,286.00	\$36,286.00	100%
CT001000002P Marina Village	A & E Services	1430	Lump sum	\$20,000.00	\$14,571.03	\$14,571.03	\$14,571.03	100%
CT001000002P Marina Village	504/VCA Compliance	1460	Lump sum	\$0.00	\$2,785.00	\$2,785.00	\$2,785.00	100%
CT001000002P Marina Village	Dwelling improvements - roofs	1460	Lump sum	\$50,000.00	\$30,227.32	\$30,227.32	\$30,227.32	100%
CT001000002P Marina Village	Dwelling improvements - bathrooms	1460	Lump sum	\$0.00	\$0.00	\$0.00		
CT001000002P Marina Village	Extermination	1460	Lump sum	\$8,520.00	\$0.00	\$0.00	\$0.00	100%
CT001000002P Marina Village	Vacancy Reduction	1460	Lump sum	\$17,891.00	\$12,121.42	\$12,121.42	\$12,121.42	100%
CT001000002P Marina Village	504/VCA Compliance	1470	Lump sum	\$0.00	\$996.00	\$996.00	\$996.00	
CT001000005P PT Barnum	Operations	1406	Lump sum	\$31,750.00	\$36,286.00	\$36,286.00	\$36,286.00	100%
CT001000005P PT Barnum	A & E Services	1430	Lump sum	\$25,000.00	\$97,758.32	\$97,758.32	\$97,758.32	100%
CT001000005P PT Barnum	Stairs	1450	Lump sum	\$225,000.00	\$959,763.48	\$959,763.48	\$959,763.48	100%

1 To be completed for the Performance and Evaluation Report.

2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement

Part II: Supporting Documents								
PHA Name: Bridgeport Housing Authority		Grant Type and Number Capital Fund Program Grant No: CT26-P001-50108 CFFP (Yes/No): No Replacement Housing Factor Grant No:				Federal FFY of Grant: 2008		
Development Number Name/HA-Wide Activities	General Description of Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original ¹	Revised ¹	Funds Obligated ²	Funds Expended ²	
CT001000005P PT Barnum	Building improvement - CAT 5 cable	1460	Lump sum	\$0.00	\$9,419.25	\$9,419.25	\$9,419.25	100%
CT001000005P PT Barnum	Extermination	1460	Lump sum	\$6,602.00	\$0.00	\$0.00	\$0.00	100%
CT001000005P PT Barnum	504/VCA Compliance	1460	Lump sum	\$50,000.00	\$0.00	\$0.00		
CT001000005P PT Barnum	Vacancy Reduction	1460	Lump sum	\$39,525.00	\$21,977.40	\$21,977.40	\$21,977.40	100%
CT001000005P PT Barnum	504/VCA Compliance	1470	Lump sum	\$0.00	\$259.57	\$259.57	\$259.57	100%
CT001000006P Charles Greene	Operations	1406	Lump sum	\$31,750.00	\$36,286.00	\$36,286.00	\$36,286.00	100%
CT001000006P Charles Greene	Management Improvements	1408	Lump sum	\$0.00	\$92,255.22	\$92,255.22	\$92,255.22	100%
CT001000006P Charles Greene	A & E Services	1430	Lump sum	\$125,000.00	\$12,645.31	\$12,645.31	\$12,645.31	100%
CT001000006P Charles Greene	Grounds Improvements	1450	Lump sum	\$20,000.00	\$7,212.00	\$7,212.00	\$7,212.00	100%
CT001000006P Charles Greene	Building improvements	1460	Lump sum	\$25,000.00	\$49,256.90	\$49,256.90	\$49,256.90	100%
CT001000006P Charles Greene	Dwelling improvements	1460	Lump sum	\$0.00	\$56,688.00	\$56,688.00	\$56,688.00	100%
CT001000006P Charles Greene	504/VCA Compliance	1460	Lump sum	\$200,000.00	\$1,368.00	\$1,368.00	\$1,368.00	100%
CT001000006P Charles Greene	Extermination	1460	Lump sum	\$3,168.00	\$0.00	\$0.00		
CT001000006P Charles Greene	Exterior Door Modifications	1460	Lump sum	\$0.00	\$0.00	\$0.00		
CT001000006P Charles Greene	Vacancy Reduction	1460	Lump sum	\$60,549.00	\$22,402.76	\$22,402.76	\$22,402.76	100%
CT001000006P Charles Greene	Dwelling equipment	1465	Lump sum	\$0.00	\$0.00	\$0.00		
CT001000006P Charles Greene	504/VCA Compliance	1470	Lump sum	\$0.00	\$22,676.79	\$22,676.79	\$22,676.79	100%
CT001000006P Charles Greene	Non-dwelling equipment	1475	Lump sum	\$25,000.00	\$264,755.77	\$264,755.77	\$264,755.77	100%
CT001000007P Fireside	Operations	1406	Lump sum	\$31,750.00	\$36,286.00	\$36,286.00	\$36,286.00	100%
CT001000007P Fireside	Management Improvements - Security	1408	Lump sum	\$120,000.00	\$101,345.06	\$101,345.06	\$101,345.06	100%
CT001000007P Fireside	A & E Services	1430	Lump sum	\$15,000.00	\$7,655.21	\$7,655.21	\$7,655.21	100%
CT001000007P Fireside	Grounds Improvements	1450	Lump sum	\$0.00	\$1,900.00	\$1,900.00	\$1,900.00	100%
CT001000007P Fireside	504/VCA Compliance	1460	Lump sum	\$30,000.00	\$1,938.70	\$1,938.70	\$1,938.70	100%
CT001000007P Fireside	Dwelling improvements - bathrooms	1460	Lump sum	\$0.00				
CT001000007P Fireside	Building improvements	1460	Lump sum	\$0.00	\$5,345.27	\$5,345.27	\$5,345.27	100%
CT001000007P Fireside	Extermination	1460	Lump sum	\$4,128.00	\$6,132.00	\$6,132.00	\$6,132.00	100%

1 To be completed for the Performance and Evaluation Report.

2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement

Part II: Supporting Documents									
PHA Name:		Bridgeport Housing Authority		Grant Type and Number			Federal FFY of Grant: 2008		
				Capital Fund Program Grant No: CT26-P001-50108					
				CFFP (Yes/No): No					
				Replacement Housing Factor Grant No:					
Development Number Name/HA-Wide Activities	General Description of Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work	
				Original ¹	Revised ¹	Funds Obligated ²	Funds Expended ²		
CT001000007P Fireside	Siding, Gutters, Downspouts	1460	2 bldgs	\$15,000.00	\$0.00	\$0.00			
CT001000007P Fireside	Vacancy Reduction	1460	Lump sum	\$10,954.00	\$7,977.31	\$7,977.31	\$7,977.31	100%	
CT001000007P Fireside	Dwelling equipment - heaters	1465	Lump sum	\$0.00	\$0.00	\$0.00			
CT001000007P Fireside	504/VCA Compliance - Forest Green Clinic	1470	Lump sum	\$0.00	\$1,150.00	\$1,150.00	\$1,150.00	100%	
CT001000009P Harborview	Operations	1406	Lump sum	\$31,750.00	\$36,286.00	\$36,286.00	\$36,286.00	100%	
CT001000009P Harborview	Management Improvements - Security	1408	Lump sum	\$200,000.00	\$133,112.35	\$133,112.35	\$133,112.35	100%	
CT001000009P Harborview	A & E Services	1430	Lump sum	\$30,000.00	\$17,671.56	\$17,671.56	\$17,671.56	100%	
CT001000009P Harborview	Grounds Improvements	1450	Lump sum	\$50,000.00	\$439,777.02	\$439,777.02	\$439,777.02	100%	
CT001000009P Harborview	Dwelling improvements	1460	Lump sum	\$0.00	\$46,877.64	\$46,877.64	\$46,877.64	100%	
CT001000009P Harborview	Extermination	1460	Lump sum	\$7,034.00	\$0.00	\$0.00			
CT001000009P Harborview	Vacancy Reduction	1460	Lump sum	\$10,600.00	\$2,989.55	\$2,989.55	\$2,989.55	100%	
CT001000009P Harborview	Dwelling equipment - heaters	1465	Lump sum	\$0.00	\$9,845.00	\$9,845.00	\$9,845.00	100%	
CT001000044P Trumbull	Operations	1406	Lump sum	\$31,750.00	\$36,286.00	\$36,286.00	\$36,286.00	100%	
CT001000044P Trumbull	Management Improvements - Security	1408	Lump sum	\$200,000.00	\$173,122.02	\$173,122.02	\$173,122.02	100%	
CT001000044P Trumbull	A & E Services	1430	Lump sum	\$50,000.00	\$21,656.64	\$21,656.64	\$21,656.64	100%	
CT001000044P Trumbull	Grounds Improvements	1450	Lump sum	\$80,000.00	\$32,301.78	\$32,301.78	\$32,301.78	100%	
CT001000044P Trumbull	504/VCA Compliance	1460	Lump sum	\$900,000.00	\$3,243.97	\$3,243.97	\$3,243.97	100%	
CT001000044P Trumbull	Dwelling improvements	1460	Lump sum	\$0.00	\$75,730.25	\$75,730.25	\$75,730.25	100%	
CT001000044P Trumbull	Extermination	1460	Lump sum	\$15,984.00	\$0.00	\$0.00			
CT001000044P Trumbull	Vacancy Reduction	1460	Lump sum	\$41,293.00	\$9,984.11	\$9,984.11	\$9,984.11	100%	
CT001000044P Trumbull	Dwelling equipment	1465	Lump sum	\$0.00	\$23,168.50	\$23,168.50	\$23,168.50	100%	
CT001000044P Trumbull	Facility Improvements	1470	Lump sum	\$0.00	\$5,786.87	\$5,786.87	\$5,786.87	100%	
CT001000044P Trumbull	Relocation	1495	Lump sum	\$0.00	\$450.00	\$450.00	\$450.00	100%	
CT001000881P Scattered Sites I	Operations	1406	Lump sum	\$31,750.00	\$18,142.00	\$18,142.00	\$18,142.00	100%	
CT001000881P Scattered Sites I	A & E Services	1430	Lump sum	\$20,000.00	\$11,046.70	\$11,046.70	\$11,046.70	100%	
CT001000881P Scattered Sites I	504/VCA Compliance - Marlboro Court	1460	Lump sum	\$50,000.00	\$335.33	\$335.33	\$335.33	100%	
CT001000881P Scattered Sites I	Dwelling improvements	1460	Lump sum	\$20,000.00	\$0.00	\$0.00			

1 To be completed for the Performance and Evaluation Report.

2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement

Part II: Supporting Documents								
PHA Name: Bridgeport Housing Authority		Grant Type and Number Capital Fund Program Grant No: CT26-P001-50108 CFFP (Yes/No): No Replacement Housing Factor Grant No:				Federal FFY of Grant: 2008		
Development Number Name/HA-Wide Activities	General Description of Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
CT001000881P Scattered Sites I	Extermination	1460	Lump sum	\$26,346.00	\$0.00	\$0.00		
CT001000881P Scattered Sites I	Vacancy Reduction	1460	Lump sum	\$10,000.00	\$4,429.21	\$4,429.21	\$4,429.21	100%
CT001000881P Scattered Sites I	Facility Improvements	1470	Lump sum	\$0.00	\$1,975.00	\$1,975.00	\$1,975.00	100%
CT001000881P Scattered Sites I	Relocation	1495	2 households	\$0.00	\$1,571.00	\$1,571.00	\$1,571.00	100%
CT001000881P Scattered Sites I	Operations	1406	Lump sum	\$0.00	\$18,142.00	\$18,142.00	\$18,142.00	100%
CT001000882P Scattered Sites II	A & E Services	1430	Lump sum	\$20,000.00	\$68,839.73	\$68,839.73	\$68,839.73	100%
CT001000882P Scattered Sites II	Grounds Improvements	1450	Lump sum	\$25,000.00	\$0.00	\$0.00		
CT001000882P Scattered Sites II	Dwelling improvements - bathrooms	1460	Lump sum	\$10,000.00	\$0.00	\$0.00		
CT001000882P Scattered Sites II	Extermination	1460	Lump sum	\$26,867.00	\$0.00	\$0.00		
CT001000882P Scattered Sites II	Vacancy Reduction	1460	Lump sum	\$13,277.00	\$12,027.01	\$12,027.01	\$12,027.01	100%
CT001000882P Scattered Sites II	Facility Improvements	1470	Lump sum	\$0.00	\$1,625.00	\$1,625.00	\$1,625.00	100%
			Total	\$4,026,683.00	\$4,062,683.00	\$4,062,683.00	\$4,062,683.00	

1 To be completed for the Performance and Evaluation Report.

2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement

HOUSING AUTHORITY OF THE CITY OF BRIDGEPORT

Nicholas Calace, Executive Director
150 Highland Avenue
Bridgeport, CT 06604
Tel. (203) 337-8900
Fax. (203) 337-8830
TDD#: 1-800-545-1833 Ext. 226
www.bridgeporthehousing.org



Shanté T. Haaks, Chairperson
Commissioners:
Dulces Nieves
Rev. Sudron Stack, Jr.
James M. Brown
Americo Santiago

June 4, 2012

Ms. Jennifer Gottlieb
Program Center Coordinator
U.S. Department of Housing
and Urban Development
20 Church Street, 19th Floor
Hartford, Connecticut 06103-3220

Dear Ms. Gottlieb:

Subject: Capital Fund Program Grant No. CT26-S001-50109

Enclosed are three executed originals of the Capital Fund for 2009 ARRA Grant budget revision and three originals of the Actual Modernization Cost Certificate for the above grant from the Housing Authority of the City of Bridgeport.

Please contact Mr. Jonas DeGuzman for any questions at 203.337.8955.

Sincerely,

HOUSING AUTHORITY OF
THE CITY OF BRIDGEPORT



Nicholas Calace
Executive Director

NC:JDG:em

Enclosures (6)

cc: Toni McGant

Part I: Summary				FFY of Grant: 2009	
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: CT26-S001-50109 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant Approval:	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Revised Annual Statement (revision no. 3) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 3/31/2011 <input checked="" type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1	
		Original	Revised	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21)				
3	1408 Management Improvements	150,000.00	7,082.25	7,082.25	7,082.25
4	1410 Administration (may not exceed 10% of line 21)	185,138.00	185,138.00	185,138.00	185,138.00
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	166,234.00	107,186.70	107,186.70	107,186.70
8	1440 Site Acquisition				
9	1450 Site Improvements	3,099,027.00	1,366,905.38	1,366,905.38	1,366,905.38
10	1460 Dwelling Structures	1,640,000.00	2,565,248.82	2,565,248.82	2,565,248.82
11	1465.1 Dwelling Equipment - Nonexpendable	0.00	373,000.00	373,000.00	373,000.00
12	1470 Non Dwelling Structures	458,815.00	1,094,652.85	1,094,652.85	1,094,652.85
13	1475 Non Dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities 4				

1 To be completed for the Performance and Evaluation Report.
 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
 3 PHA's with under 250 units in management may use 100% of CFP grant for operations.
 4 RHF funds shall be included here

Part I: Summary

PHA Name: Housing Authority of the City of Bridgeport	Grant Type and Number	FFY of Grant: 2009
	Capital Fund Program Grant No: CT26-S001-50109	FFY of Grant Approval:
	Replacement Housing Factor Grant No:	
	Date of CFFP:	

Type of Grant
 Original Annual Statement
 Performance and Evaluation Report for Period Ending: 3/31/2011
 Revised Annual Statement (revision no. 3)
 Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1	
		Original	Revised 2	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2-19)	5,699,214.00	5,699,214.00	5,699,214.00	5,699,214.00
21	Amount of line 20 Related to LBP Activities	75,000	74,302	74,302.00	74,302.00
22	Amount of line 20 Related to Section 504 Activities	500,000	634,368	634,368.00	634,368.00
23	Amount of line 20 Related to Security - Soft Costs	50,000	0		
24	Amount of line 20 Related to Security - Hard Costs	3,055,000	0		
25	Amount of line 20 Related to Energy Conservation Measures	150,000	1,745,116	1,745,116.00	1,745,116.00

Signature of Executive Director	Date:	Signature of Public Housing Director	Date:
Nicholas Calace	6/4/12		

- 1 To be completed for the Performance and Evaluation Report.
- 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
- 3 PHA's with under 250 units in management may use 100% of CFF grant for operations.
- 4 RHF funds shall be included here

Part II: Supporting Pages

PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: CT26-S001-50109 CFFP (Yes/No) No Replacement Housing Factor Grant No.			FFY of Grant: 2009 FFY of Grant Approval:				
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status	
				Original	Revised 1	Funds Obligated 2	Funds Expended		
002, 005, 006, 007, 009, 044, 881, 882 *	Management Improvements	1408	Lump sum	\$ 150,000.00	\$ 7,082.25	\$ 7,082.25	\$ 7,082.25	100%	
002, 005, 006, 007, 009, 044, 881, 882 *	Administrative Salaries	1410	Lump sum	\$ 185,138.00	\$ 185,138.00	\$ 185,138.00	\$ 185,138.00	100%	
002, 005, 006, 007, 009, 044, 881, 882 *	Vacancy Reduction via JOC and/or Force Acct includes Hazelwood LBP	1460	130 units	\$ 650,000.00	\$ 338,094.27	\$ 338,094.27	\$ 338,094.27	100%	
CT001000005P	A & B Services	1430	3 firms	\$ 70,158.00	\$ 13,812.50	\$ 13,812.50	\$ 13,812.50	100%	
CT001000005P	Stairs	1450	88 stairs	\$ 1,934,027.00	\$ 1,157,235.47	\$ 1,157,235.47	\$ 1,157,235.47	100%	
CT001000005P	Community Center Modifications	1470	1 bldg	\$ 458,815.00	\$ 1,094,652.85	\$ 1,094,652.85	\$ 1,094,652.85	100%	
CT001000006P	A & B Services	1430	2 firms	\$ 30,000.00	\$ 30,411.39	\$ 30,411.39	\$ 30,411.39	100%	
CT001000006P	Grounds Improvements	1450	Lump sum	\$ 450,000.00	\$ 25,000.00	\$ 25,000.00	\$ 25,000.00	100%	
CT001000006P	Roofs	1460	5 Buildings	\$ 725,000.00	\$ 609,000.00	\$ 609,000.00	\$ 609,000.00	100%	
CT001000006P	Stairs	1460	5 Buildings	\$ -	\$ 259,344.50	\$ 259,344.50	\$ 259,344.50	100%	
CT001000007P	A & B Services	1430	2 firms	\$ 49,076.00	\$ 27,145.23	\$ 27,145.23	\$ 27,145.23	100%	
CT001000007P	Electrical Meter Upgrades	1460	248 units	\$ 265,000.00	\$ 588,348.14	\$ 588,348.14	\$ 588,348.14	100%	
CT001000007P	Windows	1460	128 units	\$ -	\$ 443,071.91	\$ 443,071.91	\$ 443,071.91	100%	
CT001000009P	A & B Services	1430	1 firm	\$ 17,000.00	\$ 27,888.58	\$ 27,888.58	\$ 27,888.58	100%	
CT001000009P	Grounds Improvements	1450	Lump sum	\$ 695,000.00	\$ 184,669.91	\$ 184,669.91	\$ 184,669.91	100%	
CT001000044P	Grounds Improvements/Sewer/Sitework	1430	Lump sum	\$ 20,000.00	\$ -	\$ -	\$ -	0%	
CT001000044P	Central Heating Plant Replacement	1465	Lump sum	\$ -	\$ 373,000.00	\$ 373,000.00	\$ 373,000.00	100%	
CT0010000881P	Mariboro Court - 504/VCA & Roof	1460	Lump sum	\$ -	\$ 327,390.00	\$ 327,390.00	\$ 327,390.00	100%	
CT0010000882P	A & B Services	1430	Lump sum	\$ -	\$ 7,929.00	\$ 7,929.00	\$ 7,929.00	100%	
			Total	\$ 5,699,214.00	\$ 5,699,214.00	\$ 5,699,214.00	\$ 5,699,214.00	100%	

* - see five year action plan for breakdown by AMP

1 To be completed for the Performance and Evaluation Report.

2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary					
PHA Name: Housing Authority of the City of Bridgeport 150 Highland Avenue Bridgeport CT, 06604		Grant Type and Number Capital Fund Program Grant No: CT00100000909R Replacement Housing Factor Grant No: Date of CFFP:			FFY of Grant: 2009 FFY of Grant Approval:
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: 6/30/2012 <input checked="" type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)	30,000		30,000	30,000
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	2,041,561		2,041,561	2,041,561
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary					
PHA Name: Housing Authority of the City of Bridgeport 150 Highland Avenue Bridgeport CT, 06604		Grant Type and Number Capital Fund Program Grant No: CT00100000909R Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant:2009 FFY of Grant Approval:	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no: 1) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 6/30/2012 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 - 19)	2,071,561		2,071,561	2,071,561
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures	2,041,561		2,041,561	2,041,561
Signature of Executive Director <i>Nicholas Calace</i> Date <i>7/17/12</i>		Signature of Public Housing Director		Date	

¹ To be completed for the Performance and Evaluation Report.
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Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

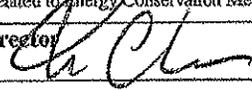
U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary					
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: CT00100000709R Replacement Housing Factor Grant No: Date of CFFP:			FFY of Grant: 2009 FFY of Grant Approval:
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no:01) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)	30,000	95,811.81	95,811.81	30,000
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	1,939,197	1,873,385.19	1,873,385.19	1,873,385.19
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFFP Grants for operations.
⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		FFY of Grant: 2009			
PHA Name: Housing Authority of the City of Bridgeport	Grant Type and Number Capital Fund Program Grant No: CT00100000709R Replacement Housing Factor Grant No: Date of CFPP:	FFY of Grant Approval:			
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no: 01) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 - 19)	1,969,197	1,969,197	1,969,197	1,903,385.19
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures	1,969,197	1,969,197	1,969,197	1,903,385.19
Signature of Executive Director 		Date	5/18/12	Signature of Public Housing Director	
				Date	

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFPP Grants for operations.
⁴ RHF funds shall be included here.

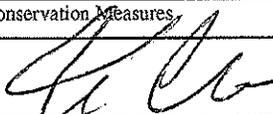
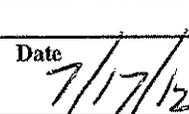
Expires 4/30/2011

Part I: Summary		
PHA Name: Housing Authority of the City of Bridgeport	Grant Type and Number	FFY of Grant: 2011
	Capital Fund Program Grant No: CT26E001501-11	FFY of Grant Approval:
	Replacement Housing Factor Grant No	
	Date of CFFP:	

Type of Grant			
<input type="checkbox"/>	Original Annual Statement	<input type="checkbox"/>	Revised Annual Statement (revision no.)
<input checked="" type="checkbox"/>	Performance and Evaluation Report for Period Ending: 6/30/2012	<input type="checkbox"/>	Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1	
		Original	Revised	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21)				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvements				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment - Nonexpendable				
12	1470 Non Dwelling Structures				
13	1475 Non Dwelling Equipment	\$	240,000.00		
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities 4				

- 1 To be completed for the Performance and Evaluation Report.
- 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
- 3 PHA's with under 250 units in management may use 100% of CFP grant for operations.
- 4 RHF funds shall be included here

Part I: Summary					
PHA Name: Housing Authority of the City of Bridgeport	Grant Type and Number Capital Fund Program Grant No: CT26E001501-11 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: 2011 FFY of Grant Approval:			
Type of Grant					
<input type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Revised Annual Statement (revision no.)			
<input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 6/30/2012		<input type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1	
		Original	Revised 2	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2-19)	\$ 240,000.00	\$ -	\$ -	\$ -
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs	\$ 240,000.00			
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director		Signature of Public Housing Director		Date:	
				7/17/12	

- 1 To be completed for the Performance and Evaluation Report.
- 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
- 3 PHA's with under 250 units in management may use 100% of CFP grant for operations.
- 4 RHF funds shall be included here

Part II: Supporting Pages									
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: CT26E001501-11 Replacement Housing Factor Grant No: Date of CFFP:					FFY of Grant: 2011 FFY of Grant Approval:		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status	
				Original	Revised 1	Funds Obligated 2	Funds Expended		
Marina Village	Security CCTV system	1475	Lump sum	\$ 120,000.00		\$ -	\$ -		
Charles Greene Homes	Security CCTV system	1475	Lump sum	\$ 120,000.00					
			Total	\$ 240,000.00	\$ -	\$ -	\$ -		

1 To be completed for the Performance and Evaluation Report.
 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement

Part I: Summary						
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: CT26D00150110 Replacement Housing Factor Grant No: Date of CFFP:			FFY of Grant: 2010 FFY of Grant Approval:	
Type of Grant						
<input type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Revised Annual Statement (revision no.)				
<input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 6/30/2012		<input type="checkbox"/> Final Performance and Evaluation Report				
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1		
		Original	Revised 2	Obligated	Expended	
1	Total non-CFP Funds					
2	1406 Operations (may not exceed 20% of line 21)					
3	1408 Management Improvements					
4	1410 Administration (may not exceed 10% of line 21)					
5	1411 Audit					
6	1415 Liquidated Damages					
7	1430 Fees and Costs					
8	1440 Site Acquisition					
9	1450 Site Improvements					
10	1460 Dwelling Structures	\$ 661,530		414,246.01	339,280.86	
11	1465.1 Dwelling Equipment - Nonexpendable	\$ -				
12	1470 Non Dwelling Structures					
13	1475 Non Dwelling Equipment	\$ -				
14	1485 Demolition					
15	1492 Moving to Work Demonstration					
16	1495.1 Relocation Costs					
17	1499 Development Activities 4					

1 To be completed for the Performance and Evaluation Report.

2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement

3 PHA's with under 250 units in management may use 100% of CFP grant for operations.

4 RHF funds shall be included here

Part I: Summary

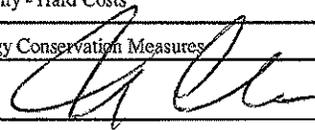
PHA Name: Housing Authority of the City of Bridgeport	Grant Type and Number	FFY of Grant: 2010 FFY of Grant Approval:
	Capital Fund Program Grant No: CT26D00150110	
	Replacement Housing Factor Grant No:	
	Date of CFFP:	

Type of Grant

Original Annual Statement
 Revised Annual Statement (revision no.)

Performance and Evaluation Report for Period Ending: 6/30/2012
 Final Performance and Evaluation Report

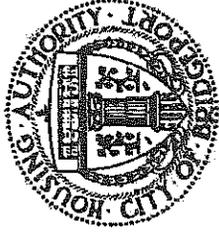
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1	
		Original	Revised 2	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2-19)	\$ 661,530		414,246.01	339,280.86
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

Signature of Executive Director		Date 4/17/12	Signature of Public Housing Director	Date:
--	---	---------------------	---	--------------

- 1 To be completed for the Performance and Evaluation Report.
- 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
- 3 PHA's with under 250 units in management may use 100% of CFP grant for operations.
- 4 RHF funds shall be included here

HOUSING AUTHORITY OF THE CITY OF BRIDGEPORT

Nicholas Calace, Executive Director
150 Highland Avenue
Bridgeport, CT 06604
T# (203) 337-8900
F# (203) 337-8830
TDD# 1-800-545-1833 Ext. 226
www.bridgeporthousing.org



Sharié T. Hanks, Chairperson
Commissioners:
Dulce Nieves
Rev. Sulton Stack, Jr.
James M. Brown
Americo Santiago

July 18, 2012

Ms. Jennifer Gottlieb-Elazhari
Program Center Coordinator
U.S. Department of Housing
and Urban Development
20 Church Street, 19th Floor
Hartford, Connecticut 06103-3220

Dear Ms. Gottlieb-Elazhari:

SUBJECT: Second Increment RHF Plan

The Housing Authority of the City of Bridgeport (HACB) sent a letter to your attention for HUD approval on July 22, 2011 regarding our RHF plan for the second increment proposing an accumulation of five years of grant funding to be used towards the Albion Street Project and other initiatives for the remaining years of the grant (see attached). We were not notified that our plan was officially approved.

Please note that the Authority should have been eligible for the 2nd increment RHF in 2011 and should have received more funds than currently allocated. We discovered that HUD had entered the incorrect data for Pequonnock Apartments but we were advised by the Field Office that the data was accurate, and no further changes were needed. As a result, the error impacted the Replacement Housing Factor calculation and we received significantly less funding. We are formulating an appeal for this discrepancy at this time.

Since the HACB did not receive notice from your office if the RHF plan was approved, we are requesting your review of the same request in concert with the review of the Agency's Annual and Five Year Plan.

If you have any questions, please contact Peter Hance at (203) 395-1785.

Sincerely,

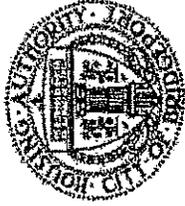
HOUSING AUTHORITY OF
THE CITY OF BRIDGEPORT


Nicholas Calace
Executive Director

cc: Peter Hance
Jonas de Guzman

HOUSING AUTHORITY OF THE CITY OF BRIDGEPORT

Nicholas Calace, Executive Director
150 Highland Avenue
Bridgeport, CT 06604
T# (203) 337-8900
F# (203) 337-8830
TDD# 1-800-545-1833 Ext. 226
www.bridgeporthehousing.org



Shante T. Hanks, Chairperson
Commissioners:
Rev. Shifton Stöck, Jr.
Daniel Ford, Esquire
Dulce Nieves

Housing and Urban Development
Hartford Field Office
One Corporate Center
20 Church Street, 19th Floor
Hartford, CT 06103-3220
July 22, 2011

For the attention of: Jennifer Gottlieb-Elazhari

Reference: **Second Increment RHF Plan -- Use and Accumulation of Second Increment RHF Funds**

Dear Ms Gottlieb-Elazhari,

The Housing Authority of the City of Bridgeport (HACB) would like to accumulate five years of second increment Replacement Housing Factor (RHF) grants, totaling approximately \$2,115,108 to be used as collateral in a Capital Fund Finance Program (CFFP) which would partly fund the construction of thirty five (35) new two bedroom apartments at 46 Albion Street. All thirty five (35) apartments would be replacement Public Housing/ACC for the former Father Panik Village. The HACB needs these funds to have sufficient funds to construct these units.

The subject grants are:

CT R001 502-11	\$ 423,021 (estimate)
CT R001 502-12	\$ 423,021 (estimate)
CT R001 503-13	\$ 423,021 (estimate)
CT R001 503-14	\$ 423,021 (estimate)
CT R001 503-15	\$ 423,021 (estimate)

It is our understanding from the information posted on the Capital Fund webpage that the obligation end date for these funds will be 10/29/2013. The HACB will construct the units in accordance with the requirements found at 24 CFR Part 941 and will meet the newly established obligation and disbursement deadlines.

The HACB confirms that its Capital Fund Program Annual Statement/Performance and Evaluation report has been approved by HUD on September 17, 2010. The HACB also confirms that its Five-Year and Annual Plan was approved on September 17, 2010. The 2011 Five Year

and Annual Plan was transmitted to HUD on July 22, 2011. The HACB is in compliance with the obligation and expenditure deadlines on all of its Capital Funds Grants and is current on its LOCCS reporting.

The HACB recognizes that in order to meet the leverage requirement, it must secure at least \$697,985 in firm financial commitments for additional funds. It is the intention of HACB to use in part the equity of approximately \$3,683,661 from the sale of 4% Low Income Housing tax Credits to meet the matching requirement. When these funds are secured, we will submit written documentation confirming the funding.

If you have any questions, please contact Christine Hermann, Director of Planning, Development and Modernization at (203) 337-8917 or chermann@bridgeporthousing.org

Yours sincerely



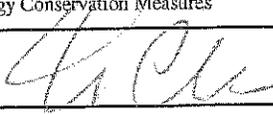
Nicholas Calace
Executive Director
Housing Authority of the City of Bridgeport

ncalace@bridgeporthousing.org
203-337-8900

Cc: Peter Hance
Christine Hermann
Joseph Macneil
Efrem Levy

Annual Statement/Performance Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary					
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: CT26-R001-50110 Date of CFFP:		FFY of Grant: 2010 FFY of Grant Approval:	
Type of Grant					
<input type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Revised Annual Statement (revision no.)			
<input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 6/30/2012		<input type="checkbox"/> Final Performance and Evaluation Report			
		Total Estimated Cost		Total Actual Cost 1	
Line	Summary by Development Account	Original	Revised 2	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2-19)	\$ 470,024.00	\$ -	\$ -	\$ -
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director:		Date		Signature of Public Housing Director	
		7/17/12			

- 1 To be completed for the Performance and Evaluation Report
- 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
- 3 PHA's with under 250 units in management may use 100% of CFP grant for operations.
- 4 RHF funds shall be included here

Part II: Supporting Pages								
PHA Name: Housing Authority of the City of Bridgeport			Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: CT26-R001-50110 Date of CFFP:				FFY of Grant: 2010 FFY of Grant Approval:	
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status
				Original	Revised 1	Funds Obligated 2	Funds Expended	
TBD	North End Housing	1499	5	\$ 470,024.00		\$ -	\$ -	
			Total	\$ 470,024.00	\$ -	\$ -	\$ -	

1 To be completed for the Performance and Evaluation Report.
 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement

Annual Statement/Performance Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

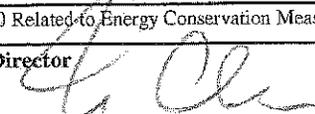
U.S Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary				FFY of Grant: 2011	
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: CT26-R001-50211 Date of CFFP:		FFY of Grant Approval:	
Type of Grant					
<input checked="" type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Revised Annual Statement (revision no.)			
<input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1	
		Original	Revised	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21)				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvements				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment - Nonexpendable				
12	1470 Non Dwelling Structures				
13	1475 Non Dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities 4	\$	423,021.00		

- 1 To be completed for the Performance and Evaluation Report.
- 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
- 3 PHA's with under 250 units in management may use 100% of CFP grant for operations.
- 4 RHF funds shall be included here

Annual Statement/Performance Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary					
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: CT26-R001502-12 Date of CFFP:			FFY of Grant: 2012 FFY of Grant Approval:
Type of Grant					
<input checked="" type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Revised Annual Statement (revision no.)			
<input type="checkbox"/> Performance and Evaluation Report for Period Ending		<input type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1	
		Original	Revised 2	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2-19)	\$ 423,021.00	\$ -	\$ -	\$ -
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director 		Date 7/17/12		Signature of Public Housing Director Date:	

- 1 To be completed for the Performance and Evaluation Report.
- 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
- 3 PHA's with under 250 units in management may use 100% of CFP grant for operations.
- 4 RHF funds shall be included here

Part II: Supporting Pages									
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: CT26-R001-50211 Date of CFFP:					FFY of Grant: 2011 FFY of Grant Approval:		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status	
				Original	Revised 1	Funds Obligated 2	Funds Expended		
Albion	Development Activity	1499	Lump sum	\$ 423,021.00		\$ -	\$ -		
			Total	\$ 423,021.00	\$ -	\$ -	\$ -		

1 To be completed for the Performance and Evaluation Report.
 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement

Annual Statement/Performance Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
Expires 4/30/2011

Part I: Summary	
PHA Name: Housing Authority of the City of Bridgeport	Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: CT26-R001502-12 Date of CFFP:
FFY of Grant: 2012 FFY of Grant Approval:	

Type of Grant

Original Annual Statement
 Revised Annual Statement (revision no.)

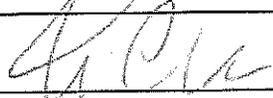
Performance and Evaluation Report for Period Ending:
 Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1	
		Original	Revised	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21)				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvements				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment - Nonexpendable				
12	1470 Non Dwelling Structures				
13	1475 Non Dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities 4		\$ 1,405.00		

- 1 To be completed for the Performance and Evaluation Report.
- 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
- 3 PHA's with under 250 units in management may use 100% of CFP grant for operations.
- 4 RHF funds shall be included here

Annual Statement/Performance Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary				FFY of Grant: 2012	
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: CT26-R001502-12 Date of CFFP:		FFY of Grant Approval:	
Type of Grant					
<input checked="" type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Revised Annual Statement (revision no.)			
<input type="checkbox"/> Performance and Evaluation Report for Period Ending		<input type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1	
		Original	Revised 2	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2-19)	\$ 1,405.00	\$ -	\$ -	\$ -
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director		Date		Signature of Public Housing Director	
		7/17/12		Date:	

- 1 To be completed for the Performance and Evaluation Report.
- 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
- 3 PHA's with under 250 units in management may use 100% of CFP grant for operations.
- 4 RHF funds shall be included here

Part I: Summary		
PHA Name: Housing Authority of the City of Bridgeport	Grant Type and Number	FFY of Grant: 2009
	Capital Fund Program Grant No:	FFY of Grant Approval:
	Replacement Housing Factor Grant No: CT26-R001-50109	
	Date of CFFP:	

Type of Grant

Original Annual Statement Revised Annual Statement (revision no.)

Performance and Evaluation Report for Period Ending: 6/30/2012 Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1	
		Original	Revised	Obligated	Expended
1	Total non-CFF Funds				
2	1406 Operations (may not exceed 20% of line 21)				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvements				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment - Nonexpendable				
12	1470 Non Dwelling Structures				
13	1475 Non Dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities 4		\$ 13,018.15		

1 To be completed for the Performance and Evaluation Report.
 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
 3 PHA's with under 250 units in management may use 100% of CFFP grant for operations.
 4 RHF funds shall be included here

Part I: Summary				FFY of Grant: 2009	
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: CT26-R001-50109 Date of CFFP:		FFY of Grant Approval:	
Type of Grant					
<input type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Revised Annual Statement (revision no.)			
<input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 6/30/2012		<input type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1	
		Original	Revised 2	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA	\$ 394,839.00	\$ 381,820.85	\$ 381,820.85	\$ 381,820.85
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2-19)	\$ 394,839.00	\$ 394,839.00	\$ 381,820.85	\$ 381,820.85
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director		Date		Signature of Public Housing Director	
		7/17/12			

- 1 To be completed for the Performance and Evaluation Report.
- 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
- 3 PHA's with under 250 units in management may use 100% of CFP grant for operations.
- 4 RHF funds shall be included here

Part II: Supporting Pages									
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number					FFY of Grant: 2009		FFY of Grant Approval:
		Capital Fund Program Grant No:							
		Replacement Housing Factor Grant No: CT26-R001-50109							
		Date of CFFP:							
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status	
				Original	Revised 1	Funds Obligated 2	Funds Expended		
Yaremich Commons	Debt Service	1501	Lump sum	\$ 394,839.00	\$ 381,820.85	\$ 381,820.85	\$ 381,820.85	100%	
North End Housing	Development of north end housing	1499	5		\$ 13,018.15				
			Total	\$ 394,839.00	\$ 394,839.00	\$ 381,820.85	\$ 381,820.85		

1 To be completed for the Performance and Evaluation Report.
 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 8/31/2011

Part I: Summary

PHA Name: Housing Authority of the City of Bridgeport	Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: CT26-R001-50108 Date of CFFP:	FFY of Grant: 2008 FFY of Grant Approval:
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Type of Grant

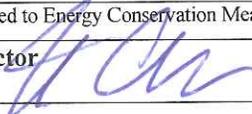
Original Annual Statement
 Reserve for Disasters/Emergencies
 Revised Annual Statement (revision no:)
 Performance and Evaluation Report for Period Ending:
 Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴	\$439,769.00			

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 08/31/2011

Part I: Summary						
PHA Name: Housing Authority of the City of Bridgeport		Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: CT26-R001-50108 Date of CFFP:			FFY of Grant:2008 FFY of Grant Approval:	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report						
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹		
		Original	Revised ²	Obligated	Expended	
18a	1501 Collateralization or Debt Service paid by the PHA	439,768.00	439,768.00	439,768.00	439,768.00	
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment					
19	1502 Contingency (may not exceed 8% of line 20)					
20	Amount of Annual Grant:: (sum of lines 2 - 19)	\$439,768.00			439,768.00	
21	Amount of line 20 Related to LBP Activities					
22	Amount of line 20 Related to Section 504 Activities					
23	Amount of line 20 Related to Security - Soft Costs					
24	Amount of line 20 Related to Security - Hard Costs					
25	Amount of line 20 Related to Energy Conservation Measures					
Signature of Executive Director 		Date 10/24/12		Signature of Public Housing Director		
				Date		

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHF funds shall be included here.

REVISIONS TO THE ADMISSION AND CONTINUED OCCUPANCY POLICY

The agency's Admission and Continued Occupancy Policy must be revised periodically in order to comply with changes set forth by the U.S. Department of Housing and Urban Development (HUD) and to adjust operating procedures. The last revision was made effective July 18, 2011.

The following policy is being submitted for adoption into the Housing Authority of the City of Bridgeport's ACOP for Fiscal year 2011-2012.

The revision proposed at this time pertains to:

**I. Mandated Use of Enterprise Income Verification (EIV) Policy 24 CFR § 5.233
[To be inserted onto page 52, under Article "C"]**

1. HACB will utilize the Department of Housing and Urban Development's (HUD) Enterprise Income Verification (EIV) system as a third party verification tool to authenticate a tenant's employment and income during reexaminations and rent interims. This system allows HACB to search within the Multifamily (MF) and Public and Indian Housing (PIH) databases to identify individuals who may be receiving multiple rental subsidies, those who may be recently hired, recently deceased, or to verify citizenship status. This system can also be used to verify a tenant's identity. Therefore, in an effort to reduce administrative and subsidy payment errors it is imperative that the reports be run on a consistent basis. The following reports need to be run at least once every three (3) months:
 - a. New Hires Report
 - b. Multiple Subsidy Report
2. HACB will utilize the Department of Housing and Urban Development's (HUD) Enterprise Income Verification (EIV) system to run the following reports at least monthly:
 - a. Deceased Tenants Report
 - b. Identity Verification Report
 - c. Immigration Report

**II. Qualifying for Admissions Policy
[To be inserted onto page 6, under Article "B"]**

- d. Provide documentation of Social Security Numbers for **all** family members, or certify that they do not have Social Security Numbers

III. Resident Paid Utilities Policy

[To be inserted onto page 44, under Article “A”]

11. During the annual reexamination, residents with tenant paid utilities must be able to demonstrate that each utility service account is active with the utility provider. “Shut-Off” Notices will not be accepted and the services must be in an adult member’s name within the current family composition; however, in the event that the household begins to receive a utility reimbursement from HACB, the utilities must be in the Head of Household’s name as any check issued to supplement utility expenses may only be issued to Head of Household.

IV. Reasonable Accommodations Policy

[To be inserted onto page 4, under Article “B”]

13. Assistance animals are those that assist persons with disabilities in the activities of independent living. Under equal housing opportunity laws, an assistance animal is one that assists or benefits a person with a disability by affording such person the equal opportunity to use and enjoy his or her dwelling. This includes not only assistance, but also emotional support animals. **The assistance animal must be licensed**, vaccinated, and qualified to perform the assistance or benefit needed by the person with the disability.

PHA applicants/tenants with disabilities have the right to have an assistance animal as a reasonable accommodation. To best manage these reasonable accommodation requests, the PHA has developed an Assistance Animal Policy which details the assistance animal reasonable accommodation processes and policy.

V. Providing Information in Languages other than English

[To be inserted onto page 5, under Article “C”]

4. At all HACB offices a notice will be available that states **“the Bridgeport office of the International Institute of Connecticut, Inc. can provide translation in other languages if HACB staff do not speak the appropriate language and the applicant or resident cannot provide their own translator.”**
5. Applicants and residents with low English comprehension may furnish an interpreter to assist in communication with HACB. **For applicants and residents who speak Spanish, HACB will provide translation services if requested by applicant.**

VI. Additions to and Deletions from the Resident Family and Household Policy
[To be inserted onto page 27, under Article “C”]

2. Family members added as a result of birth, adoption or court awarded custody do not require approval of HACB, although the family must notify HACB of the additional member. Generally HACB will approve the *addition* of other family or household members when that individual passes screening and does not overcrowd the family. The word “addition” will be applied to the following circumstances:
 - a. If resident plans to marry;
 - b. If resident is awarded custody of a child over the age for which juvenile justice records are available;
 - c. If resident desires to add a new family member to the lease;
 - d. If resident desires to employ a live-in aide;
 - e. If resident desires to take in a foster child(ren);
 - f. If a unit is left occupied by a “remaining family member(s)
3. Any added or requested “adult” must be part of the leaseholder’s family as defined by **24 CFR § 5.403**. In addition, the added or requested adult cannot add subordinate family (son, daughter, or legal guardian of requested additional member(s). Any adult family member that has been removed from the family composition will not be added back onto the family composition. When the new family member is added to the family composition, the additional adult member must reside within the household for a minimum of three (3) years in order to be eligible to become head of household.
4. Remaining family members may remain within the unit and become “Head of Household” only when the Head of Household passes or is institutionalized (i.e., convalescent home, nursing home, or assisted care) and the remaining family, upon re-execution of the lease, must agree to transfer into the next available unit, in accordance with the ***Occupancy Guidelines Policy***.



HOUSING AUTHORITY OF THE CITY OF BRIDGEPORT

ADMISSIONS & CONTINUED OCCUPANCY POLICY

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HOUSING AUTHORITY OF THE CITY OF BRIDGEPORT

Admissions and Continued Occupancy Policy

Explanatory Note 1: This Admissions and Continued Occupancy Policy (ACOP) is the policy of the Board of Commissioners of the Housing Authority of the City of Bridgeport (HACB) governing Public Housing occupancy in property the HACB owns. The ACOP sets forth the Board's mandatory requirements for performing occupancy-related work and can be revised only by Board resolution and, if the revision is significant, by changing the Annual Plan.

The ACOP is designed to be used with a series of Procedures referenced throughout the text in boldface italic type. The procedures are implementing requirements that describe how this policy is to be carried out. Operational details, forms, checklists, methods and systems are contained in procedures, rather than in this policy. The HACB will issue new procedures whenever necessary. All procedures will be dated and numbered.

APPLICABILITY: This Admissions and Continued Occupancy Policy applies to all public housing owned and managed by the Bridgeport Housing Authority. This policy does not apply to Bridgeport public housing managed by private entities. A separate Admissions and Continued Occupancy Policy governs public housing managed by private entities.

I. Nondiscrimination

A. Complying with Civil Rights Laws

1. Civil rights laws protect the rights of applicants and residents to equal treatment by the Housing Authority in operating its programs. It is the policy of HACB to comply with all Civil Rights laws now in effect and subsequently enacted, including but not limited to:
 - a. Title VI of the Civil Rights Act of 1964, which forbids discrimination on the basis of race, color, religion, national origin or sex; **24 CFR §§ 1 and 100**
 - b. Title VIII of the Civil Rights Act of 1968 (as amended by the 1974 HCDA and the Fair Housing Amendments Act of 1988), which extends protection against discrimination based on disability and familial status, and spell out forms of prohibited discrimination; **24 CFR § 100**
 - c. Executive Order 11063,
 - d. Section 504 of the Rehabilitation Act of 1973, which describes specific housing rights of persons with disabilities; **24 CFR § 8**
 - e. Age Discrimination Act of 1975, which establishes certain rights of the elderly; **24 CFR § 146**
 - f. Title II of the Americans with Disabilities Act, otherwise Section 504 and the Fair Housing Amendments govern (Title II deals with common areas and public space, not living units.)
 - g. Any applicable State laws or local ordinances.



1. The HACB shall not discriminate because of race, color, national origin, sex, religion, familial status, or disability in the leasing, rental, occupancy, use, or other disposition of housing or related facilities, including land which is part of a development under the HACB's jurisdiction covered by a public housing Annual Contributions Contract with HUD. Other rights of applicants and residents are listed in the *Procedure on Civil and Disability Rights*. **24 CFR § 100**
2. HACB shall not deny admission to otherwise qualified applicants because of their membership in some group to which negative behavior may be imputed (e.g., families with children born to unmarried parents or families whose head or spouse is a student). Instead, each applicant who is a member of a particular group will be treated as an individual based on his or her attributes and behavior. **24 CFR § 960.203(a)**
3. HACB shall not permit these policies to be subverted to do personal or political favors. **24 CFR § 206(e)**
4. HACB will offer units only in the order prescribed by this policy, since any other method violates the policy, federal law, and the civil rights of the other families on the waiting list. **24 CFR § 206(e)**

B. Reasonable Accommodations Policy

1. HACB, as a public agency that provides low rent housing to eligible families, has a legal obligation to provide "reasonable accommodations" to applicants and residents if they or any family members have a disability. **24 CFR § 8.4**
2. A reasonable accommodation is some modification or change HACB can make to its apartments, buildings, or grounds or methods and procedures that will assist an otherwise eligible applicant with a disability to take full advantage of and use HACB's programs, including those that are operated by other agencies in HACB-owned public space. **24 CFR § 8.20**
3. An accommodation is not reasonable if it: **24 CFR § 8.21(b) and 24 CFR § 8.24(a)(2)**
 - a. Causes an undue financial and administrative burden; or
 - b. Represents a fundamental alteration in the nature of HACB's program.
4. Subject to the undue burdens and fundamental alterations tests, HACB will correct physical situations or procedures that create a barrier to equal housing opportunity for all. To permit people with disabilities to take full advantage of the HACB's housing program and non-housing programs, in accordance with Section 504 and the Fair Housing Amendments Act of 1988, HACB shall comply with all requirements and prohibitions in applicable law. Specific actions are described in the *Procedure on Civil Rights and Disability Rights*. **24 CFR § 8.4**
5. Facilities and programs used by applicants and residents shall be accessible to persons in wheelchairs, persons with sensory impairments and other persons with disabilities. Application and management offices, hearing rooms, community centers, day care centers, laundry facilities, craft and game rooms, etc. (to the extent that the HACB has such facilities) will be usable by residents with a full range of



disabilities. If HACB offers such facilities, and none is accessible, some¹ will be made so, subject to the undue financial and administrative burden test. **24 CFR § 8.21**

6. Documents and procedures used by applicants and residents will be accessible for those with vision, hearing or other sensory impairments. Also, all documents will be written simply and clearly to enable applicants with learning or cognitive disabilities to understand as much as possible. Methods used to ensure that communication is understandable by persons with disabilities are described in the *Procedure on Civil Rights and Disability Rights*. **24 CFR § 8.6**
7. Examples of reasonable accommodations include, but are not limited to: **24 CFR § 8.4**
 - a. Making alterations to a HACB apartment to make it fully accessible so it could be used by a family member with a wheelchair;
 - b. Transferring a resident from an apartment or townhome that cannot be made accessible to an apartment that is accessible;
 - c. Widening the door of a community room or public restroom so a person in a wheelchair may use the facility;
 - d. Adding or altering apartment or building features so they may be used by a family member with a disability, including but not limited to:
 - 1) Installing strobe-type flashing light in addition to regular smoke detectors in an apartment for a family with a hearing impaired member;
 - 2) Adding structural grab bars in the bathroom;
 - 3) Changing the doorknobs to lever-type door handles;
 - 4) Changing to a refrigerator with the freezer on the bottom instead of the top;
 - 5) Installing a magnifier over the thermostat;
 - 6) Lowering or adding an additional lower peephole on the door so it may be used by a person in a wheelchair;
 - e. Permitting a family to have a large dog to assist a family member with a disability in a HACB family development where the size of dogs is usually limited; **24 CFR § 8.20** To best manage these reasonable accommodation requests, the PHA has developed an Assistance Animal Policy which details the assistance animal reasonable accommodation process and policy. *Procedure on Reasonable Accommodations*
 - f. Providing a van to take HACB resident children to and from their development, where the childcare facility is on HACB property and is not accessible, to an accessible childcare facility; **24 CFR § 8.21**
 - g. Making sure that HACB processes are understandable to applicants and residents with sensory or cognitive impairments, including but not limited to: **24 CFR § 8.6**

¹ It is not required that all public and common areas be made accessible so long as persons with disabilities have full access to all the types of facilities and activities available to persons without disabilities. Thus, not all laundry facilities need to be accessible so long as there are sufficient accessible laundry facilities for use by persons with disabilities at each development that provides laundry facilities.



- 1) Making large type documents, Braille documents, cassettes or a reader available to an applicant or resident with a vision impairment during interviews or meetings with HACB staff;
 - 2) With prior notice, making a sign language interpreter available to an applicant with a hearing impairment during interviews or meetings with HACB staff;
 - 3) Permitting an applicant or resident with a disability to be accompanied or represented by a family member, friend or advocate at all meetings and interviews with HACB if the individual desires such representation;
 - 4) Permitting an outside agency or individual to assist an applicant with a disability to meet the HACB's applicant screening criteria.
8. An applicant family that has a member with a disability must still be able to meet essential obligations of tenancy. They must be able **24 CFR § 8.3**
- a. to pay rent and other charges (e.g. utility bills) as required by the lease in a timely manner;
 - b. to care for and avoid damaging the apartment and common areas;
 - c. to use facilities and equipment in a reasonable way;
 - d. to create no health, or safety hazards, and to report maintenance needs;
 - e. not to interfere with the rights and peaceful enjoyment of others, and to avoid damaging the property of others;
 - f. not to engage in prohibited criminal activity that threatens the health, safety or right to peaceful enjoyment on or near the premises by other residents or staff; and not to engage in drug-related criminal activity; and
 - g. to comply with necessary and reasonable rules and program requirements of HUD and the HACB.
9. If an applicant or resident family member needs assistance with one of the essential obligations of tenancy, HACB will, as a reasonable accommodation, make a referral to an individual or agency that can provide such assistance. **24 CFR § 8.20**
10. If an applicant or resident receives a referral to an agency or individual who can assist the applicant or resident with complying with the essential obligations of tenancy, the applicant or resident is not obligated to accept the service, but if refusing service results in a lease violation, HACB may terminate the lease. **24 CFR § 8.20**
11. An applicant or resident family with a member who has a disability and needs or wants a reasonable accommodation may request it at any time. **24 CFR § 8.20**
12. If an applicant or resident would prefer not to discuss the situation with the HACB or disclose his/her disability, that is his/her right.
13. Assistance Animals-Assistance animals are those that assist persons with disabilities in the activities of independent living. Under equal housing opportunity laws, an assistance animal is one that assists or benefits a person with a disability by affording such person the equal opportunity to use and enjoy his or her dwelling. This includes not only assistance, but also emotional support animals. The assistance



animal must be licensed, vaccinated and qualified to perform the assistance or benefit needed by the person with the disability.

PHA applicants/tenants with disabilities have the right to have an assistance animal as a reasonable accommodation. To best manage these reasonable accommodation requests, the PHA has developed an Assistance Animal Policy which details the assistance animal reasonable accommodation processes and policy.

C. Providing Information in Languages other than English

1. All forms, written materials and recorded voice-mail messages used to communicate with prospective applicants and residents shall be available in Spanish. This includes the following documents related to registration, intake, marketing, outreach, certification, reexamination and inspections.
2. Whenever possible and whenever dictated by marketing and outreach efforts, the above materials and messages will be made available in other languages.
3. The HACB will make every effort to make information related to verification of citizenship or eligible immigration status available in the language of the applicant.
4. At all HACB offices a notice will be available that states "the Bridgeport office of the International Institute of Connecticut, Inc. can provide translation in other languages if HACB staff do not speak the appropriate language and the applicant or resident cannot provide their own translator."
5. Applicants and residents with low English comprehension may furnish an interpreter to assist in communication with HACB. For applicants and residents who speak Spanish, HACB will provide translation services if requested by applicant.
6. Periodically, HACB will review the necessity to address other languages. The following factors will be taken into account:
 - a. The number or proportion of Limited English Proficiency (LEP) persons eligible to be served or likely to be encountered by the program;
 - b. The frequency with which LEP persons come into contact with the programs;
 - c. The nature and importance of the program, activity or serviced provided by the HACB programs to people's lives;
 - d. The resources available to HACB and the costs.



II. Eligibility for Admission and Processing of Applications

A. Affirmative Marketing 24 CFR §960.103

1. HACB will conduct affirmative marketing as needed so the waiting list includes a mix of applicants with races, ethnic backgrounds, ages and disabilities proportionate to the mix of those groups in the eligible population of the area. The marketing plan will take into consideration the number and distribution of vacant units, units that can be expected to become vacant because of move-outs, and characteristics of families on the waiting list. HACB will review these factors regularly to determine the need for and scope of marketing efforts. All marketing efforts will include outreach to those least likely to apply. The method used for Affirmative Marketing is described in *Procedure on Affirmative Marketing*.

B. Qualifying for Admission

1. It is HACB's policy to admit only applicants who are qualified² according to the following criteria:
 - a. Are a family³, as defined in Section XII of this policy;
 - b. Meet HUD requirements on citizenship or immigration status;
(24 CFR § 5.5 (subpart E))
 - c. Have an Annual Income (as defined in Section XI of this document) at the time of admission that does not exceed the income limits (maximum incomes by family size established by HUD) posted in HACB offices. (24 CFR § 960.102)
 - d. Provide documentation of Social Security numbers for all family members, or certify that they do not have Social Security numbers; and (24 CFR § 5.216)
 - e. Meet the Applicant Selection Criteria in Section II. F. of these policies, including completing a HACB-approved pre-occupancy orientation session if required; (24 CFR § 960.202 & 203)
 - f. Meet the eligibility criteria for Supportive/Disabled as defined by Specific Program Guidelines.
2. The HACB will not deny admission to a current or former victim of domestic violence, dating violence or stalking, if otherwise qualified. (42 U.S.C. 13925)

C. Establishing and Maintaining the Waiting List

1. It is the policy of HACB to administer its waiting list as required by HUD's regulations and its *Procedure on Application Intake and Processing*. Waiting lists will be opened and closed in accordance with HACB's *Procedure on Opening and Closing Waiting Lists*. Applicant names will be removed from the waiting list only in accordance with HACB's *Procedure on Removing Applicants from the Waiting List*. 24 CFR § 960.206

² The term "qualified" refers to applicants who are eligible and able to meet the applicant selection standards. This term is taken from the 504 regulations: 24 CFR § 8.3 definition of "Qualified Individual with Disability".

³ A family can be a single person.



2. HACB will periodically update each waiting list sublist by contacting all applicants in writing⁴.
3. If an applicant's preference status changes while on the waiting list, the applicant's position on the list will be adjusted in accordance with HACB's *Procedure on Application Intake and Processing*.

D. Processing Applications for Admission

1. HACB will accept and process applications in accordance with applicable HUD Regulations and HACB's *Procedure on Application Intake and Processing*. HACB will assume that the facts certified to by the applicant in the preliminary application are correct, although all those facts will be verified later in the application process.
2. Every application file for admission to public housing shall include the application number; applicant's race and ethnicity; eligibility determination; when eligible, the apartment size(s) for which eligible; preference(s), if any; and the date, location, identification, and circumstances of each vacancy offered and accepted or refused. **24 CFR § 85.42**
3. As applicants approach the top of the waiting list, they will be asked to come to the HACB for an interview to complete their applicant file. Applicants who fail to attend their scheduled interview or who cannot be contacted to schedule an interview will be sent a letter of interest. If applicant is interested for LIPH they will be scheduled a second and final interview. Applicants who fail to attend their second and final interview have their applications withdrawn, subject to reasonable accommodations for people with disabilities. *See Procedure on Removing Applicant from the Waiting List*
4. Each application will be processed only to the extent necessary to determine whether the applicant is apparently eligible.
5. Only one application shall remain open per family for the same program. Applicants will be notified of duplicate applications
6. The application may be filled out by the applicant, designated agent, or by the PHA, but must be signed by the applicant and checked for completeness by the PHA in the presence of the applicant, before the application is submitted.
7. The PHA may request documentation from the applicant needed to verify the information provided at the time the application is taken.
 - a. The following information will be verified according to HACB's *Procedure on Verification*, to determine qualification for admission to HACB's housing: **24 CFR § 960.259**
 - 1) Family composition and type (Elderly/Disabled/Near elderly /Non-elderly)
 - 2) Annual Income
 - 3) Assets and Asset Income
 - 4) Deductions from Income
 - 5) Preferences
 - 6) Social Security Numbers of all Family Members⁵

⁴ Or by the method designated at initial application by applicants with disabilities.

⁵ Or certification that they do not have a social security number, if the individual doesn't have a social security number.



- 7) Applicant Screening Information
 - 8) Citizenship or eligible immigration status
 - 9) Photo identification of all adult family and household members
- b. Third party written, faxed or electronic verification is the required form of documentation. Any other form of verification requires a note to the file explaining its use. **24 CFR § 960.259**

E. The Preference System

1. Preferences establish the order of applicants on the waiting list. An admission preference does not guarantee admission. Every applicant must still meet HACB's Selection Criteria before being offered an apartment. Preferences will be granted to applicants who are otherwise qualified and who, at the time of the offer (immediately prior to execution of a lease), are verified to meet the definitions of the preferences described below. **24 CFR § 960.206**
2. Notwithstanding any applicant's application number, HACB will select applicants from the waiting list in such a way as to ensure that at least 40 percent of the applicants admitted to the public housing program during any fiscal year are at or below the Extremely Low Income (ELI) limit – 30 percent of the median income for the MSA-- at the time of admission. HACB will not implement income tiers, since analysis of the waiting list demographics indicates that reaching the 40 percent goal will be easily reached.

If necessary to meet the statutory requirement that 40 percent of newly admitted families in any fiscal year be families who are extremely low-income (unless a different target is agreed to by HUD), the HACB retains the right to skip higher income families on the waiting list to reach extremely low-income families. This measure will only be taken if it appears the goal will not otherwise be met. To ensure this goal is met, the Housing Authority will monitor incomes on a monthly basis of newly admitted families and the income of the families on the waiting list. If there are not enough extremely low-income families on the waiting list, we will conduct outreach on a non-discriminatory basis to attract extremely low-income families to reach the statutory requirement

3. Ranking Preferences-General Population Developments **24 CFR § 960.206**

Ranking preferences are used to sort among applicants. HACB has established two hierarchic ranking preferences. In order, they are:

 - a. **FIRST: Disaster Preference,**
 - b. **SECOND: Working Preference**

Families that qualify for no Ranking preferences will be categorized as No-preference families.

4. Definition of Ranking Preferences
 - a. HACB defines Disaster to include major catastrophic events that could neither be foreseen nor prevented by the applicant. Examples would include declared natural disasters (hurricanes, tornadoes, earthquakes, etc.) and events such as airplane crashes that destroy the applicant's housing. Disaster preferences would not normally be awarded to applicants whose homes are destroyed by fire unless the fire destroys more than one building and the applicant could in no way be implicated in the fire (as verified by the Fire



Marshall). For example, arson fires and fires caused by carelessness would not qualify an applicant for this preference

- b. HACB defines Working preference to include all applicants with adult members who have been employed for at least 28 hours per week for at least six months. Additionally, persons who cannot work because of age or disability qualify for this ranking preference.
5. Ranking Preferences - Mixed Population Buildings
 - a. HACB has no ranking preference for the Mixed Population Buildings, other than those listed in the Tenant Selection and Assignment Plan for Fireside Apartments and 25one-bedroom scattered sites.
 6. Ranking Preferences – Elderly Designated Buildings
 - a. HACB has no ranking preference for the Elderly Designated Buildings.
 7. Programmatic Preferences-If the low income public housing waiting lists are used to lease properties that have required programs applicants/transfers meeting those requirements will have preference. The following list: Homeless, Veterans, Congregate, HIV positive, domestic violence, incentive housing, (*See Transfer Procedure*, etc.) The authority reserves the right to establish new programmatic preferences and create sub waiting lists through formal notification of existing eligible applicant/transfers.

F. Screening Applicants for Admission

1. All applicants shall be screened in accordance with HUD's regulations and sound management practices. During screening, HACB requires applicants to demonstrate ability to comply with the essential provisions of the lease: **24 CFR§ 960.202 – 205**
 - a. to pay rent and other charges (e.g. utility bills) as required by the lease in a timely manner;
 - b. to care for and avoid damaging the apartment and common areas;
 - c. to use facilities and equipment in a reasonable way;
 - d. to create no health, or safety hazards, and to report maintenance needs;
 - e. not to interfere with the rights and peaceful enjoyment of others, and to avoid damaging the property of others;
 - f. not to engage in prohibited criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises by other residents or staff; and not to engage in drug-related criminal activity; and
 - g. to comply with necessary and reasonable rules and program requirements of HUD and the HACB.
2. HACB will determine each applicant family's ability to comply with the essential lease requirements in accordance with HACB's *Procedure on Applicant Screening*.
 - a. Any costs incurred to complete the application process and screening will by paid by HACB.
 - b. Applicants who owe money to HACB or any other housing authority will be rejected. **24 CFR §203**



- c. The HACB is **required** to reject the applications of certain applicants for criminal activity or drug abuse by family members⁶:
 - 1) The HACB is required to reject any applicant for three years from the date of eviction if any household member has been evicted from any federally assisted housing for drug-related criminal activity. However, the HACB may admit the household if the HACB determines that: **24 CFR § 204(a)**:
 - a) The evicted household member who engaged in drug-related criminal activity has successfully completed a supervised drug rehabilitation program approved by the HACB, or
 - b) The circumstances leading to the eviction no longer exist (for example, the criminal household member has died or is imprisoned).
 - c) The applicant household will not include the member involved in drug-related criminal activity
 - 2) The HACB is **required** to reject the application of a household if the HACB determines that:
 - a) Any household member is currently engaging in illegal use of a drug; or **24 CFR § 960.204 (a) (2)**⁷
 - b) The HACB has reasonable cause to believe that a household member's illegal use or pattern of illegal use of a drug may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents; or **24 CFR § 960.204 (a) (2)**
 - c) Any household member has ever been convicted of manufacture or production of methamphetamine on the premises of any federally assisted housing; or **24 CFR § 960.204 (a) (3)**
 - d) Any member of the household is subject to a lifetime registration requirement under a State sex offender registration program; or **24 CFR § 960.204(a) (4)**
 - e) Any member of the household's abuse or pattern of abuse of alcohol may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents. **24 CFR § 960.204. (a)(4)**⁸
 - f) In addition to the HUD-required rejections for criminal activity, HACB will reject applicants if HACB determines that
 - 1) Any household member has ever been convicted of arson or child molestation; or **24 CFR § 960. 203. (c)(3)**
 - 2) Any household member has a criminal history in the past three years that involves crimes of violence to persons or property; **24 CFR § 960.203.(c)**
 - 3) Crimes of violence to persons or property would include but not be limited to homicide or murder, destruction of property or vandalism, burglary, robbery or theft, drug trafficking, drug manufacture, drug use or drug possession, threats or harassment,

⁶ Criminal history on children under age 18 who are charged as adults will be used.

⁷ For purposes of this section a household member is "currently engaged in" the criminal activity if the person has engaged in the behavior recently enough to justify a belief that the behavior is current

⁸ HACB must be able to show a relationship between the applicant household member's abuse of alcohol and behavior that threatens the health, safety, or right to peaceful enjoyment of other residents.



assault or fighting, domestic violence, weapons offenses, criminal sexual assault, home invasion. **24 CFR § 960.203**

- 4) The HACB has reasonable cause to believe that a household member's involvement in gang activity in the past three years may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.
 - a) An applicant's intentional misrepresentation of information related to eligibility, preference for admission, housing history, allowances, family composition or rent will result in rejection. Unintentional mistakes that do not confer any advantage to the applicant will not be considered misrepresentations.
 - b) Applicants must be able to demonstrate the ability and willingness to comply with the terms of HACB's lease, either alone or with assistance that they can demonstrate they will have at the time of admission.⁹ Availability of assistance is subject to verification by HACB. **24 CFR § 8.2, Definition, Qualified Individual with Handicaps)**
 - c) The HACB will not deny admission to a current or former victim of domestic violence, dating violence or stalking, if otherwise qualified. (42 U.S.C. 13925)

3. Screening applicants who claim mitigating circumstances

- a. If negative information is received about an applicant, HACB shall consider the time, nature, and extent of the applicant's conduct and mitigating circumstances that might indicate a reasonable probability of favorable future conduct. **24 CFR § 960.203(d)**.
- b. Mitigating circumstances are facts relating to the applicant's record of unsuitable rental history or behavior, which, when verified, indicate both: (1) the reason for the unsuitable rental history and/or behavior; and (2) that the reason for the unsuitable rental history and behavior is no longer in effect or is under control, **AND** applicant's prospect for lease compliance is an acceptable one, justifying admission. Mitigating circumstances would overcome or outweigh information already gathered in the screening process.
- c. HACB will consider whether individuals with negative behavior in their recent past can document that they have been rehabilitated. See II.F.2.c of this ACOP.

4. Qualified and Unqualified Applicants

- a. Qualified families will be notified by HACB of the approximate date of admission insofar as that date can be determined, however the date stated is an estimate and does not guarantee that applicants will be housed by that date. **24 CFR § 960.208**
- b. Unqualified applicants will be promptly notified by a Notice of Rejection from HACB, stating the basis for such determination and offering an opportunity for informal hearing (see *Procedure for Informal Hearing for Rejected Applicants*). At the Informal

⁹ Applicants whose landlord, financial, criminal and other references demonstrate that they are already willing and able to comply with lease terms in their existing housing will be considered to have met this criterion, whether or not they are disabled. Applicants whose housing situations make it difficult for HACB to determine whether or not they are able and willing to comply with lease terms (e.g. because they are homeless, are living with friends or relatives, or have other non-traditional housing circumstances) will have to demonstrate ability and willingness to comply with lease terms whether or not they are disabled.



Hearing the applicant can offer information about mitigating circumstances or mistakes in fact upon which HACB's decision was based. Informal hearings for applicants are different from the resident grievance process. Applicants are not entitled to use of the resident grievance process (24 CFR § 960.208(a)).

- c. Applicants known to have a disability who are eligible but fail to meet the Selection Criteria will be offered an opportunity for a second meeting to determine whether mitigating circumstances or reasonable accommodations will make it possible for them to be housed in accordance with the Screening Procedures.

G. Occupancy Guidelines: (HUD Notice of Policy, Dec. 18, 1998 Federal Register)

- 1. Apartments shall be occupied by families of the appropriate size. This policy maintains the usefulness of the apartments, while preserving them from excessive wear and tear and underutilization.

Minimum and Maximum-Number-of-Persons-Per Unit Standard

<u>Number of Bedrooms</u>	<u>Min Persons/Unit</u> <u>(Largest Unit Size)</u>	<u>Max Persons/Unit</u> <u>(Smallest Unit Size)</u>
0BR	1	1
1BR	1	2
2BR	2	4
3BR	3	6
4BR	4	8
5BR	5	10

- 2. The following principles govern the size of apartment for which a family will qualify. Generally two people are expected to share a bedroom. Units will be so assigned that:
 - a. Children age two and under will share a bedroom with any other child or a parent, regardless of age or sex;
 - b. Two children between the ages of three and seventeen of the same sex share a bedroom;
 - c. Two children between the ages of three and seventeen of the opposite sex will not be assigned to share a bedroom, although they may do so at the request of the family.
 - d. Adults (over age eighteen) of the same sex share a bedroom;
 - e. Adults (over age eighteen) of opposite sexes who are spouses or co-heads share a bedroom;
 - f. Adults (over age eighteen) of opposite sexes who are not spouses or co-heads of household do not share a bedroom although they may do so at the request of the family.
 - g. Exceptions to the largest permissible apartment size may be made in case of reasonable accommodations for a person with disabilities.
 - h. An unborn child will not be counted as a person in determining apartment size. A single pregnant woman may be assigned to a one-bedroom apartment, although HACB may



place a pregnant woman in a larger bedroom size unit if the unit currently occupied is considered to be small.

- i. In determining apartment size, HACB will count for unit size determination a child who is temporarily away from the home because the child has been placed in foster care, kinship care, or is away at school, so long as the family can document that the child will be living with the family.
 - j. A live-in aide may be assigned a bedroom. Single elderly or disabled residents with live-in attendants will be assigned one or two bedroom units.
 - k. The Housing Authority will not discriminate to single persons with live-in aides.
3. The Local Housing Code of two persons per bedroom is the standard for the smallest apartment a family may be offered¹⁰.
 4. The largest apartment size that a family may be offered would be one bedroom per family member, considering family size and composition.
 5. When a family applies for housing and when the waiting list is updated, some families will qualify for more than one apartment size. These applicants will choose the waiting sublist from which they will receive an offer, and will be placed on the appropriate waiting sublist by apartment size.
 - a. If a family chooses a smaller apartment than would normally be assigned (e.g. because they will receive an offer sooner), the family shall agree in writing to occupy that apartment until their family size or circumstances change.
 - b. When a family is actually offered an apartment, if they no longer qualify for the apartment size where they were sublisted, they will be moved to the appropriate sublist, retaining their preferences and computer generated application number. However, their application date will change to the date and time they became qualified for the apartment size. This may mean that they may have to wait longer for an offer.
 - c. The HACB shall change the family's sublist at any time at the family's request. An applicant may remove him/herself from any sub-list and it will not affect their original pre-application date, as long as one of the original sub-lists is retained. An applicant may add him/herself to a new sub-list not depicted on the original pre-application and the date and time of the requested change will be used.

H. Record of Applications and Waiting Lists

The following are policies for documenting actions taken by PHA employees in processing applications for dwelling units.

A. Organizing the Applicant Waiting List

1. In order to achieve the PHA's goal of income targeting and income mixing, incentives such as waiver of pet or security deposits, assignment of units based on one person per bedroom, etc. may be adopted

¹⁰ Individual apartments with very small or very large bedrooms or other specific situations that inhibit or encourage lower or higher levels of occupancy may be permitted to establish lower or higher occupancy levels so long as the occupancy levels will not discriminate on the basis of familial status.



by the Board of Commissioners of the PHA. If so, that policy will be incorporated into this document by reference. **24 CFR § 1.4(2) (ii)**

HACB has received HUD approval for site-based waiting lists at certain properties.

- a. All current applicants for apartments of the size and type offered at developments with Site-based Waiting Lists will be given an opportunity to list up to three developments where they would accept an offer or to opt for the “first available” apartment offer¹¹.
- b. Thereafter, new applicants would have the same opportunity to select up to three developments or first available unit.
- c. During the purging of the waiting list, applicants will have an opportunity to change their site selection when their application is updated. This is the only time that it will not affect their original pre-application date. *See Procedure on Application Placement*

Although applicants will have an opportunity to select the sites where they wish to receive offers, the senior/disabled designated waiting list and offers will continue to be administered centrally for the designated mixed population senior/disabled properties.

Each applicant for family housing shall be assigned his/her appropriate place on the site based waiting list(s) in sequence based upon:

- d. Type and size of apartment needed and selected by the family (e.g. general occupancy building, accessible or non-accessible apartment, number of bedrooms);
- e. Applicant preference, if any; and
- f. Date and time application was received or application number.

HACB will maintain its waiting list in the forms of a computer report (capable of being tracked back to original paper applications) that records the type and size of apartment needed, each applicant’s priority/preference status, the date and time of application or application number, and the race and ethnicity of the family head.

2. Waiting Lists for Mixed Population Buildings **24 CFR § 903.7(b) (2)**

Each applicant for mixed population housing shall be assigned his/her appropriate place on a single community-wide waiting list in sequence based upon:

- a. type and size of apartment needed and selected by the family (e.g., accessible or non-accessible apartment, number of bedrooms); and
- b. date and time application was received or application number.

HACB will maintain its waiting list in the form of a computer report (capable of being tracked back to original paper applications) that records the type and size of apartment needed, each applicant’s priority/preference status, the date and time of application or application number, and the race and ethnicity of the family head.

3. Waiting Lists for Elderly Designated Buildings **24 CFR § 903.7(b) (2)**

Each applicant for elderly designated housing shall be assigned his/her appropriate place on a single community-wide waiting list in sequence based upon:

¹¹ Selecting the “First Available Unit” option would put the applicant on all the site-based units of the type for which the applicant qualifies.



- c. type and size of apartment needed and selected by the family (e.g., accessible or non-accessible apartment, number of bedrooms); and
- d. date and time application was received or application number.

HACB will maintain its waiting list in the form of a computer report (capable of being tracked back to original paper applications) that records the type and size of apartment needed, each applicant's priority/preference status, the date and time of application or application number, and the race and ethnicity of the family head.

B. Updating the Waiting Lists

1. The PHA requires applicants to report, in writing or in person, any changes in family composition or circumstances, and any significant changes in income or assets that would affect the family's eligibility, the type of development, the size and type of unit needed, or the family's preference category for admission. A verified change in preference status may result in the applicant being moved up or down on the waiting list.
2. An applicant must report immediately, in writing or in person, any change in address and/or telephone number. Any correspondence returned postmarked by the United States Postal Service as undeliverable or any unsuccessful attempt by the PHA to contact the applicant shall be grounds for withdrawal of the pre-application.

C. Application Rejection and Removal from the Waiting List

1. The PHA will remove an applicant's name from the waiting list under the following conditions:
 - a. The applicant requests that their name be removed; or
 - b. The applicant has been advised in writing to inform the PHA of the applicant's continued interest by a particular time, and the applicant failed to do so; or
 - c. The PHA has made reasonable efforts to contact the applicant to determine if there is continued interest, but the PHA has been unsuccessful in locating the applicant; or
 - d. The PHA has made reasonable efforts to contact the applicant to schedule interviews as necessary.

I. Re-Entry Program

This Re-Entry Program was recently approved by the Board of Commissioners as a Pilot Program to be administered by the Housing Choice Voucher (HCV) & Low Income Public Housing (LIPH) Program. The Board of Commissioners unanimously approved the implementation of this program in March 2008.

The purpose of this program is to promote family re-unification and provide assistance for eligible applicants who have been incarcerated and who are currently active participants in a Re-Entry Program.

- A. Qualified applicants will be processed by a referral, only from the Re-Entry program or an equivalent, to be eligible to participate in the Family Re-Unification Pilot Program, in the Section 8 HCV Program, the LIPH Program or the Project-Based Voucher Program. Each



applicant must complete the following eligibility screening criteria in accordance with the application selection process.

Qualified applicants must submit three references¹² from:

- a program supervisor
- probation officer; or
- a social service agency

Applicants must be gainfully employed or complete a training program to obtain employment.

1. If applicants have a history of drug abuse or alcohol abuse, they must obtain a Certificate of Completion from a reputable Rehabilitation Program.
- B. No one will be admitted to the program if he/she is a Lifetime Registered Sex Offender or if they have had any experience with the use and manufacturing of methamphetamines.
- C. All applicants are subject to all of the HUD regulations, statutes and guidelines that regulate the Section 8 HCV, LIPH and Project-Based Voucher Programs. All applicants are also subject to the Administrative Plan, guidelines, policies and procedures of the Section 8 HCV, LIPH and Project-Based Voucher Programs.
- D. Applicants for the Re-Entry Program must be on the existing waiting list. If a family member is re-unifying with an existing family, the member can be added to the family composition upon final eligibility screening.
- E. Applicants on the waiting list must be processed in accordance with existing screening criteria and eligibility determination.
- F. Applicants determined ineligible will be given an opportunity to request an Informal Hearing, in writing, to the HACB.

J. One Strike Policy

All federally assisted housing is intended to provide a place to live and raise families, not a place to commit crime, to use or sell drugs or terrorize neighbors. It is the intention of the Housing Authority of the City of Bridgeport to fully endorse and implement a policy that is designed to:

- Help create and maintain a safe and drug-free community
- Keep our program participants free from threats to their personal and family safety
- Support parental efforts to instill values of personal responsibility and hard work
- Help maintain an environment where children can live safely, learn and grow up to be productive citizens
- Assist families in their vocational/educational goals in the pursuit of self-sufficiency.

¹² Any exceptions or waivers to the screening criteria will be determined case by case. The Housing Authority of the City of Bridgeport (HACB) will have the last right of refusal.



A. Administration

1. All screening procedures shall be administered fairly and in such a way as not to discriminate on the basis of race, color, nationally, religion, sex, familial status, disability, or against other legally protected groups, and not to violate right to privacy. To the maximum extent possible, HACB will involve other community and governmental entities in the promotion and the enforcement of this policy. This policy will be posted on HACB's bulletin board and copies made readily available to applicants and residents upon request.

HUD Definitions

Drug-related criminal activity is the illegal manufacture, sale, distribution, use or possession with intent to manufacture, sell, distribute or use a controlled substance (as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802)). Drug-related criminal activity means on or off, not just near the premises. Criminal activity includes any criminal activity that threatens the health, safety or right to peaceful enjoyment of the resident's public housing premises by other residents or employees of HACB.

B. Screening for One Strike

1. In an effort to prevent drug related and other criminal activity, as well as other patterns of behavior that pose a threat to the health, safety or the right to peaceful enjoyment of the premises by other residents. HACB will endeavor to screen applicants at the time of the initial application is made, as thoroughly and fairly as possible.
2. If in the past HACB initiated a lease termination, which may or may not have resulted in eviction for any reason cited under the One Strike Notice, for a family, as a prior resident of public housing. HACB shall have the discretion to consider all circumstances of the case regarding the extent of participation by non-involved family members.
3. HACB will ferret out information concerning a family's criminal activities as part of the processing of an application for assistance. Initial screening will include routine inquiries of the family and any other information provided to HACB regarding this matter; and complete criminal checks. The inquiries will be standardized and directed to all applicants by inclusion in application form.
4. If as a result of the standardized inquiry and/or criminal check, or the receipt of a verifiable referral, there is indication that the family or any family member is engaged in drug-related criminal or violent criminal activity, HACB will conduct closer inquiry to determine whether the family should be denied admission.

C. FBI and Law Enforcement Records

1. HACB will check criminal history for all applicants and adults/family members in the household to determine whether any member of the family has engaged in violent or drug-related criminal activity. Verification of any past activity will be done prior to final eligibility and will include a check of conviction records.
2. HACB has applied to the Federal Bureau of investigation (FBI) and obtained a unique Originating Agency Identifier (ORI) number in order to maximize its efforts in obtaining applicant criminal



record history. HACB through the HACB Chief of Security processes and funnels requests in order to obtain National Crime Information Center (NCIC) data for the purpose of accessing FBI criminal records. HACB will do a name check only through its local law enforcement agency to access limited information from the NCIC. The Housing Authority also checks criminal histories of applicants.

3. If the channeling agency indicates to HACB that there is a criminal history record indexed in the Interstate Identification Index which might belong to the applicant, HACB must submit an applicant fingerprint card to the FBI through the appropriate channel in order to verify whether the criminal record is in fact the applicant's. Should the applicant instead elect to withdraw their application, no further action will be necessary.

D. Standard for Violation

1. Persons evicted from public housing, Indian housing, Section 23, or any Section 8 program because of drug-related criminal activity are ineligible for admission to Public Housing for a five (5) year period beginning on the date of such eviction. The HACB will waive this requirement if: The person demonstrates successful completion of a rehabilitation program approved by the HACB, or the circumstances leading to the eviction no longer exist. For example, the individual involved in drugs is no longer in the household because the person is incarcerated. ***See Procedure on Applicant Screening***
2. HACB will permanently deny admission to public housing persons convicted of manufacturing or producing methamphetamine on the premises of the assisted housing project in violation of any Federal or State law. "Premises" is defined as the building or complex in which the dwelling unit is located, including common areas and grounds.
3. HACB will deny participation in the program to applicants where HACB determines there is reasonable cause to believe that the person is illegally using a controlled substance or engages in drug-related or other criminal activity. The same will apply if it is determined that the person abuses alcohol in a way that may interfere with the health, safety or right to peaceful enjoyment of the premises by other residents. This includes cases where HACB determines that there is a pattern of illegal use of controlled substances or a pattern of alcohol abuse.
4. Engaged in or engaging in or recent history of drug related criminal activity means any act within the past five (5) years by applicant or participants, household members, or guests which involved criminal activity that would threaten the health, safety or right to peaceful enjoyment of the public housing premises by other residents or employees of the Housing Authority, which did or did not result in the arrest and/or conviction of the applicant or participant, household members, or guests.

E. Other Criminal Activity

1. "Other criminal activity" means a history of criminal activity involving crimes of actual or threatened violence to persons or property, or a history of other criminal acts, conducts or behavior which would adversely affect the health, safety or welfare of other residents.



- a. For the purposes of this policy, this is construed to mean that a member of the current family has been convicted of any criminal or drug-related criminal activity within the past five (5) years.
2. HUD defines violent criminal activity as any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force against a person or property, and the activity is being engaged in by any family member.
3. No family member may have engaged in or threatened abusive or violent behavior toward HACB personnel at any time. No family member may have committed fraud, bribery or any other corrupt or criminal act in connection with any federal housing program in the last five (5) years.

F. Evidence

The Housing Authority must have evidence of the violation.

1. Preponderance of evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not. The intent is not to prove criminal liability, but to establish that the act(s) occurred.
 - a. Preponderance of evidence is not to be determined by the number of witnesses, but by the greater weight of all evidence.
2. Credible evidence may be obtained from police and/or court records. Testimony from neighbors, when combined with other factual evidence, can be considered credible evidence. Other credible evidence includes documentation of drug raids or arrest warrants, evidence gathered by HACB inspectors and/or investigators and evidence gathered from the HACB Hotline (203-576-7983). Residents may call this number to report problems in the site. Caller identities are not required and shall remain private.
3. The HACB may pursue fact-finding efforts as needed to obtain credible evidence, including obtaining information from drug abuse treatment centers. HACB will inquire of all applicants whether they are currently using or in the past have ever engaged in the illegal use of a controlled substance. HACB will inquire of all applicants who respond in the affirmative whether they are currently receiving treatment or have ever received treatment at a drug abuse treatment facility. All participants who respond in the affirmative will be required to sign a written consent authorizing the Housing Authority to receive information from the drug abuse treatment facility stating only whether the facility has reasonable cause to believe that the applicant is currently engaging in the illegal use of a controlled substance. The authorization will be sent to the drug abuse treatment facility with a Housing Authority postage paid return addressed envelope addressed to the attention of the Resident Selection office.

G. Confidentiality of Criminal Records

1. HACB will ensure that any criminal record received is maintained confidentially, not misused or improperly disseminated and destroyed once the purpose for which it was requested is



accomplished. All criminal reports, while needed by the Resident Selection Department for screening for criminal behavior, will be housed in a locked file with access restricted to individuals responsible for such screening.

- a. Misuse of the above information by any employee will be grounds for termination of employment. Penalties for misuse are contained in the Personnel Policy.
2. If the family is determined eligible for initial or continued assistance, the HACB's copy of the criminal report shall be shredded as soon as the information is no longer needed for eligibility or continued assistance determination.
3. If the family's assistance is denied or terminated, the criminal record information shall be shredded immediately upon completion of the review or hearing procedures and a final decision has been made.
4. HACB will document in the family's file that the family was denied admission or the tenancy was terminated due to findings in the Criminal History Report.

H. Disclosure of Criminal Records to Family

1. Before HACB takes any adverse action based on a criminal conviction record, the applicant will be provided with a copy of the criminal record and an opportunity to dispute the record. Applicants will be provided an opportunity to dispute the record at an Informal Hearing. Residents may contest such records at the court hearing in the case of evictions.

I. Hearings

1. If information is revealed that would cause HACB to deny admission to the household and the person disputes the information, they shall be given an opportunity for an Informal Hearing according to HACB's hearing procedures outlined in the Chapter on Complaints, Grievances and Appeals.



III. Tenant Selection and Assignment Plan

A. Making Unit Offers – General Population Developments and Elderly Designated Developments (including Forest Green)

1. Certain types of transferees will receive offers of housing before applicants from the waiting list.
2. In all offers HACB shall not discriminate on grounds of race, color, sex, religion, national origin, disability or familial status. Also, see the *HACB Procedure on Transfers*.
3. Specifically, the following order of offers applies:
 - a. Emergency transfers; **24 CFR § 966.4 (h)**
 - b. Administrative transfers in the following category order:
 - 1)Category 1: Problems of a life-threatening nature
 - 2)Category 2: Reasonable accommodations for residents with disabilities **24 CFR § 8.4**
 - 3)Category 3: Four sub priorities below:
 - Modernization transfers
 - Revitalization transfers
 - Problems of violence that are less than life-threatening
 - Overcrowding, over-housing, and split families **24 CFR § 966.4(c)**
 - c. Designated housing transfers;
 - d. Incentive Transfers;
 - e. New Admissions from the waiting list;
 - f. Resident-initiated transfers
4. To assure equal opportunity and nondiscrimination on grounds of race, color, sex, religion, national origin, disability or familial status the one-offer plan will be used to make apartment offers to applicants from waiting lists. **24 CFR § 1.4(2)(ii)**
5. The first qualified applicant in sequence on the waiting list is made one offer of an apartment of appropriate size and type.
 - a. An applicant on the community-wide list must accept the vacancy offered or be withdrawn from the waiting list unless the applicant refuses the offer with Good Cause. The family cannot reapply for a period of 12 months from the withdrawal date.
 - b. Applicants for site-based waiting lists will be dropped from all the site-based lists they chose and must re-apply to get back on the waiting list unless they refuse the offer with Good Cause. The family cannot reapply for a period of 12 months from the withdrawal date. (see *Procedure on Good Cause for Refusal of Unit Offers*)
6. HACB will first match the apartment available to the highest-ranking applicant for an apartment of that size, type and special features (if any), taking into account designated housing. Preferences will then



be used to determine the order of selection from the waiting list. If two applicants need the same type and size of apartment and have the same preference status, the applicant with the earlier date and time of application or lower application number will receive the earliest offer. **24 CFR § 960.206(c)**

7. The applicant must accept any apartment offered within 3 working days of the later of
 - a. the date the offer is communicated (by phone, mail, or the method of communication designated by an applicant with disabilities); or
 - b. the date they are shown the apartment.
8. If the applicant does not accept the unit offer within the time frame in number 7 above, they will be withdrawn from the waiting list and cannot reapply for 12 months from the date of withdrawal.
9. All offers made over the phone will be confirmed by letter¹². If unable to contact an applicant by phone or first class mail, HACB will send a certified letter, return receipt requested.
10. If more than one apartment of the appropriate size and type is available, the first apartment to be offered will be the apartment that is or will be ready for move-in first. If two units are ready for move-in on the same day, the first apartment to be offered will be the apartment that became vacant first.
 - a. Names will be removed from the waiting list in accordance with *Procedure on Removing Applications from the Waiting List*.

B. Accessible/Adaptable Units – General Population Developments

1. Before offering accessible/adaptable apartments to non-disabled applicants, HACB will offer such units:
 - a. First, to a current public housing resident having a disability that requires the special features of the vacant apartment. **24 CFR § 8.27(1) (a)**
 - b. Second, to an eligible qualified applicant on the waiting list having a disability that requires the special features of the vacant apartment. **24 CFR § 8.27(1) (b)**
2. When offering an accessible/adaptable apartment to a non-disabled applicant, HACB will require the applicant to agree to move to an available non-accessible apartment within 30 days when a current resident or an applicant with a disability needs the apartment. This requirement is also reflected in the lease signed with the applicant. **24 CFR § 8.27 (2)**

C. Making Unit Offers – Fireside Apartments

1. Available units at Fireside Apartments will be offered as follows to ensure that the ratio of Disabled Families to Elderly Families reaches 2:1:
 - a. First, to the next elderly family on the Mixed Population waiting list or on the Over Housed Transfer Waiting list
 - b. Second, to the next elderly family on the Mixed Population waiting list or on the Over Housed Transfer Waiting list
 - c. Third, to the next disabled family on the Mixed Population waiting list, whose head of household is under 50 years of age on the date the offer is made. If there is no such disabled family on the Mixed Population waiting list whose file is ready to be

¹² Or by the communication method requested by an applicant with disabilities



assigned, then to the next disabled family on the Fireside Disabled Transfer List, whose head of household is under 50 years of age on the date the offer is made. If there are no disabled families whose head of household is less than 50 years of age on either the Mixed Population waiting list or on the Fireside Disabled Transfer List, then to the next disabled family on the Mixed Population waiting list whose head of household is under 62 years of age on the date the offer is made.

- d. Fourth, to the next disabled family on the Mixed Population waiting list, whose head of household is under 50 years of age on the date the offer is made. If there is no such disabled family on the Mixed Population waiting list whose file is ready to be assigned, then to the next disabled family on the Fireside Disabled Transfer List, whose head of household is under 50 years of age on the date the offer is made. If there are no disabled families whose head of household is less than 50 years of age on either the Mixed Population waiting list or on the Fireside Disabled Transfer List, then to the next disabled family on the Mixed Population waiting list whose head of household is under 62 years of age on the date the offer is made.
- e. Fifth, to the next disabled family on the Mixed Population waiting list whose head of household is under 62 years of age on the date the offer is made.
- f. Sixth, to the next disabled family on the Fireside Disabled Transfer List. If there is no disabled family on the Fireside Disabled Transfer List, then to the next disabled family on the Mixed Population waiting list whose head of household is less than 62 years of age on the date the offer is made.
- g. Seventh, to the next elderly family on the Mixed Population waiting list or on the Overhoused transfer waiting list.
- h. Eighth, to the next disabled family on the Mixed Population waiting list whose head of household is under 50 years of age on the date the offer is made. If there is no such disabled family on the Mixed Population waiting list whose file is ready to be assigned, then to the next disabled family on the Fireside Disabled Transfer List, whose head of household is under 50 years of age on the date the offer is made. If there are no disabled families whose head of household is less than 50 years of age on either the Mixed Population waiting list or on the Fireside Disabled Transfer List, then to the next disabled family on the Mixed Population waiting list whose head of household is under 62 years of age on the date the offer is made.
- i. Ninth, to the next disabled family on the Mixed Population waiting list whose head of household is under 50 years of age on the date the offer is made. If there is no such disabled family on the Mixed Population waiting list whose file is ready to be assigned, then to the next disabled family on the Fireside Disabled Transfer List, whose head of household is under 50 years of age on the date the offer is made. If there are no disabled families whose head of household is less than 50 years of age on either the Mixed Population waiting list or on the Fireside Disabled Transfer List, then to the next disabled family on the Mixed Population waiting list whose head of household is under 62 years of age on the date the offer is made.
- j. Tenth, to the next disabled family on the Mixed Population waiting list whose head of household is under 62 years of age on the date the offer is made.



- k. Eleventh, to the next disabled family on the Fireside Disabled Transfer List. If there is no Disabled Family on the Fireside Disabled Transfer List, then to the next disabled family on the Mixed Population waiting list whose head of household is less than 62 years of age on the date the offer is made.
- l. Twelfth, to the next elderly family on the Mixed Population family on the Mixed Population Waiting List or on the Overhoused transfer list.
- m. If there is an elderly family on the Overhoused transfer list willing to accept a one-bedroom unit at Fireside Apartments, then the unit may be assigned by HACB at any time. If HACB assigns a Fireside unit to an elderly family on the Overhoused transfer list outside of the order set above, then HACB will skip the next assignment to an elderly family.

D. Making Unit Offers – Scattered Site One-Bedroom Units

One bedroom scattered site units will be offered to eligible non-elderly disabled families on the Mixed Population Waiting list (as an alternative to a unit at Fireside Apartments). The scattered site units will be offered to disabled families until 25 scattered site one-bedroom units are assigned to disabled families. The assignment of the scattered site units does not impact HACB's obligation to meet the above-described ratio of disabled families to elderly families at Fireside Apartments. Once 25 scattered site one-bedroom units have been leased to non-elderly disabled families, this program will be ended.

E. Administering the Applicant and Transfer Waiting Lists

Applications for admission and transfer will be processed centrally by the Resident Selection Department. Initial intake, waiting list management, screening, and assigning of housing (including transfers) will be made from the Resident Selection Department¹³. Offers may be made in person, in writing or by phone from the central office or the development

F. Transfers – General Population Developments and Mixed Population (other than Fireside Apartments)

HACB has six types of transfers: Emergency, Administrative - Category 1, 2 and 3, and Incentive transfers. The definition of each type of transfer is found in the Transfer section of the Admissions and Occupancy Policy.

1. Emergency, Categories 1 and 2 Administrative, and Incentive transfers take precedence over admissions.
2. Category 3 administrative transfers will be processed at the rate of four admissions to each transfer.
3. The specific definitions of each type of transfer are covered in Section V, Transfers, below.
4. Tenants on the transfer list may refuse transfer offers for the "good cause" reasons cited in Section C above without losing their position on the transfer list.

¹³ The exception to this policy is that Mixed Finance properties are administered by the property managers at those sites.



5. Tenants receiving an offer of transfer must move within five working days of the date of the offer or from the date when the unit is ready for occupancy.
6. Tenants who refuse a transfer offer without good cause may be removed from the transfer list, and tenants whose transfers are mandatory are subject to lease termination. **24 CFR § 955.4(c)**
7. Tenants may use the HACB Grievance Procedure if they are refused the right to transfer or if HACB is requiring them to transfer and they do not want to do so. **24 CFR § 966.50**

G. Transfers – Fireside Apartments

HACB has established a Fireside Disabled Transfer list to allow HACB tenants who were disabled when they moved into public housing or became disabled afterward, to be considered for a transfer to Fireside Apartments. Only tenants who are disabled¹⁴ and under the age of 62 at the time they were initially assigned a unit of public housing and are a resident in good standing will be placed on the Fireside Disabled Transfer list. For purposes of the Fireside Disabled Transfer list a resident in good standing means a tenant who:

1. is current in his or her rent payments;
2. does not engage in conduct that constitutes a serious threat to the health, safety, or right to peaceful enjoyment of the premises by other residents and/or HACB employees, including, but not limited to:
 - a. criminal activity, which includes violent crimes, any drug related criminal activity occurring on or off, not just on or near, the HACB premises, and any other crime that poses a threat to the life, health, safety or peaceful enjoyment of the premises by other residents;
 - b. the illegal use of any controlled substance or the abuse of alcohol or the use of any controlled substance in such a way that may interfere with the health, safety, or right to peaceful enjoyment of the premises by other residents; and
 - c. any other conduct that constitutes a serious threat to the health, safety, or right to peaceful enjoyment of the premises by residents or HACB employees; and
3. meet the housekeeping standards of HACB.

For purposes of being transferred to a Fireside unit, tenants who are placed on the Fireside Disabled Transfer list who are more than 30 days behind on their rent or who owe any administrative charges pursuant to the terms of their lease with the HACB shall be placed on the Fireside Disabled Transfer list, but shall not be transferred until their rent is brought current and all administrative charges are paid. If a tenant reaches the top of the Fireside Disabled Transfer list, and is more than 30 days behind on their rent or owes administrative charges, the tenant shall not be transferred to the Fireside Apartments until the rent is brought current and all administrative charges are paid.

Families will be placed on the Fireside Disabled Transfer list based on the date and time the tenant filed his/her last pre-application.

Selection from the Fireside Disabled Transfer list will be in accordance with the Tenant Selection and Assignment Plan.

¹⁴ Either disabled at the time they were initially assigned or who thereafter became disabled



IV. Leasing Dwelling Units

A. General Leasing Policy

1. Apartments will be leased without regard to race, religion, sex, age, national origin, disability and family status. **24 CFR §§ 1.4 and 100**
2. All public housing units must be occupied by families whose sole residence is the public housing apartment. **24 CFR § 966.4(f)**
3. All units must be occupied pursuant to a signed HACB lease that complies with HUD's regulations **24 CFR § 966.4**.
4. HACB will not offer nor move a family into an apartment that does not meet basic standards of habitability, including HUD occupancy standards. **24 CFR § 966.4(e)**
5. The lease shall be signed by the head, spouse, and all other adult members of the family and by the Executive Director or other authorized representative of HACB, prior to actual admission **24 CFR § 966.4 (p)**
6. The manager shall provide an explanation of the lease provisions either prior to move-in or at the time of move-in.
7. Changes in family composition, income or family status between the eligibility interview and leasing will be processed by the Occupancy Department. Changes after leasing will be processed by the Manager.
8. The resident shall pay a security deposit at the time of leasing. The security deposit shall be an amount set forth in the Lease. Pet deposits are in addition to the security deposit, in accordance with the *Pet Procedure*. **24 CFR § 966.4(b)(5)**
9. If a resident transfers from one HACB apartment to another, a new lease will be executed for the dwelling into which the family moves. **24 CFR § 966.4 (a)(ii)**
10. If at any time during the life of the lease agreement, a change in the resident's status results in the need for changing or amending any provision of the lease, either: **24 CFR § 966.4(c)**
 - a. A new lease agreement will be executed, or
 - b. A Notice of Rent Adjustment will be executed, or
 - c. An appropriate rider will be prepared and made a part of the existing lease.

All copies of such riders or insertions are to be dated and signed by the Resident and by the Executive Director or other authorized representative of HACB. **24 CFR § 966.4 (o)**

11. At the time of leasing the new resident will receive a copy of the HACB Lease and the following attachments:
 - a. Pet Policy (**See Procedure on Pet Policy**)
 - b. Grievance Procedure
12. If, at any time, the head of household dies or leaves the unit for any reason (institutionalization, incarceration, forming a new household elsewhere), HACB will permit the remaining members of the family to remain in the unit so long as:
 - a. The remaining family member(s) report the death or departure of the head within ten days of the occurrence;



- b. There is still at least one family member who was listed on the lease for the apartment;
 - c. There is at least one family member who is either an adult or an emancipated minor capable of executing a lease;
13. Residents are not permitted to allow roomers or boarders to occupy their apartment. Violation of this provision is grounds for lease termination;
14. Residents are not permitted to allow a former resident of HACB who has been evicted to occupy their unit. Violation of this provision is grounds for lease termination.
15. Residents must advise HACB if they will be absent from the apartment for more than 7 days. Residents shall notify the manager, secure the apartment and provide a means for HACB to contact the resident in an emergency. Failure to advise HACB of an extended absence is grounds for termination of the lease. The Executive Director or his designee may determine if a family may remain following incarceration of the only adult family member. See *HACB's Procedure on Incarceration & HACB's Procedure on Family Absences*

B. Showing Units Prior to Leasing

1. Applicants shall have an opportunity to see the unit being offered before they accept the offer and lease the apartment in accordance with *HACB's Procedure on Showing Units Prior to Leasing*.
2. HACB will not show nor move a family into a unit that does not meet basic habitability standards,

C. Additions to and Deletions from the Resident Family and Household

1. Only persons listed on the most recent certification form and lease, or added in accordance with law or HACB's *Procedure on Additions to Resident Families/Households*, shall be permitted to occupy a dwelling unit (24 CFR § 966.4(a)(v)).
2. Family members added as a result of birth, adoption or court awarded custody do not require approval of HACB, although the family must notify HACB of the additional member. Generally HACB will approve the *addition* of other family or household members when that individual passes screening and does not overcrowd the family. The word "addition" will be applied to the following circumstances:
 - a. If resident plans to marry;
 - b. If resident is awarded custody of a child over the age for which juvenile justice records are available;
 - c. If resident desires to add a new family member to the lease;
 - d. If resident desires to employ a live-in aide;
 - e. If resident desires to take in a foster child(ren);
 - f. If a unit is left occupied by a "remaining family member(s)";
3. Any added or requested "adult" must be part of the leaseholder's family as defined by 24 CFR § 5.403. In addition, the added or requested adult cannot add subordinate family (son, daughter, or legal guardian of requested additional member(s)). Any adult family member that has been removed from the family composition will not be added back onto the family composition. When the new family member is



added to the family composition, the additional adult member must reside within the household for a minimum of three (3) years in order to be eligible to become head of household.

4. Remaining family members may remain within the unit and become "Head of Household" only when the head of household passes or is institutionalized (i.e., convalescent home, nursing home, or assisted care) and the remaining family, upon re-execution of the lease, must agree to transfer into the next available unit, in accordance with the *Occupancy Guidelines Policy*.

D. Visitors

1. Visitors are permitted in a dwelling unit in accordance with HACB's *Procedure on Visitors* so long as they have no previous history of behavior on HACB premises that would be a lease violation.
2. A guest may visit for a total of 14 days in any twelve-month period. Visits of more than three days and less than 14 days are permitted, provided they are reported to the Manager within three days. Requests for guest visits that exceed 14 days in any twelve-month period must be approved by the Executive Director or his designated representative.



V. Transfer Policy

A. General Transfer Policy

1. Transfers are made without regard to race, color, national origin, sex, religion, or familial status. Residents can be transferred to accommodate a disability. Transfers will be made in accordance with HACB's *Transfer Procedure*. **24 CFR § 100.5**
2. Transfers to Fireside Apartments and to 25 one-bedroom scattered site units are governed by the Tenant Selection and Assignment Plan. Once the ratio is reached for Fireside Apartments and 25 one-bedroom scattered site units have been leased in accordance with the Tenant Selection and Assignment Plan, all transfers to and from Fireside and the one-bedroom scattered site units will be processed in accordance with this Chapter.
3. Residents will not be transferred to a dwelling unit of equal size except to alleviate hardship of the resident or other undesirable conditions as determined by the Executive Director or designee.
4. Residents will receive one offer of a transfer. Refusal of that offer without good cause will result in lease termination for mandatory transfers or the removal of the household from the transfer list for voluntary transfers. **24 CFR § 1.4(2)(ii)**
5. A notice requirement for emergency transfers is not required, since, by definition, these involve danger to residents. A notice requirement for administrative transfers in which the resident is in danger from criminal elements or domestic violence is not required, but all other categories of transfers require at least 30 days written notice¹⁵. **24 CFR § 966.4(h)**
6. When possible, HACB will allow a resident in good standing to choose the property to which to transfer for rehabilitation or redevelopment units.
7. HACB may, from time to time, revise the *Transfer Procedures* to expand the categories of transfers to create and implement special programs and/or incentives for the benefit of public housing residents.
8. If a family is transferred to another HACB public housing unit while under a court stipulation, the terms of the court stipulation will continue to apply to the family during its tenancy in the new unit.

B. Types of Transfers

1. The order in which families are transferred shall be hierarchic by category set forth below.
 - a. Emergency Transfers are mandatory when HACB determines that unit or building conditions pose an immediate threat to resident life, health or safety. In addition, mandatory transfers are made to resolve problems of a life-threatening nature that are not related to building or unit conditions. Such conditions could involve crime, domestic violence, hate crimes, medical or disability issues, or other situations that put a resident's life in danger from something other than the condition of the unit or building. A family that is verified to be subject to domestic violence at another PHA may be transferred as an Emergency Transfer under this policy, following completion of all screening requirements. Approval for such a transfer may be made by the Executive Director or his designee. **24 CFR § 966.4(h)**

¹⁵ Transfers under the Relocation Rights Contract require 120 to 180 days notice.



- 1) HACB is not required to give prior notice of an Emergency Transfer;
 - 2) Emergency conditions that occur due to resident abuse or neglect will be grounds for emergency transfers, however resident will be charged for the damages caused to the apartment¹⁶. **24 CFR § 966.4(h)**
 - 3) Refusal to make an emergency transfer is grounds for lease termination and eviction.
- b. Administrative Transfers: These transfers shall take priority over new admissions.
- 1) Category 1 Voluntary administrative transfers to move residents with disabilities to accessible units or units with features that accommodate their disabilities better than those in their current apartments. Also included in this category are transfers of families living in accessible units who are required to move to accommodate a family requiring the accessibility features of the unit. **24 CFR § 8.27(1)**
 - 2) Category 2 This category of administrative transfers includes those due to modernization, revitalization, victim assistance, and severe over and under housing. It is set up in 3 sub priorities – A through C as described below
 - i. Sub priority A: Transfers to permit unit modernization and the revitalization of communities;
 - ii. Sub priority B: Transfers to alleviate threats from criminal elements and domestic violence;
 - iii. Sub priority C: Transfers for split families and severely over- or under-housed families; **24 CFR § 966.4(c)**
 - 3) Category 3 This category of administrative transfers includes mandatory transfers within sites or between sites may be made to: correct and avoid concentration of the most economically and socially deprived families; correct occupancy standards (Voluntary if the family is between the minimum and maximum occupancy standard but the family requests a transfer, e.g. to permit older children of opposite sexes to have separate bedrooms); or address situations such as neighbor disputes that are not criminal but interfere with the peaceful enjoyment of the unit or common areas.
- c. Incentive Transfers: Voluntary transfers to Mixed Income and scattered site properties available to residents who are both lease compliant and either working 30 hours per week or in full compliance with Community Service requirements and Voluntary transfers available to lease compliant residents of senior buildings (both elderly and non-elderly families) who wish to transfer from a designated elderly building and who were residents at the date of designation.
- Requests for these transfers will be made to the manager with necessary documentation to substantiate the need for such transfers. Transfers may also be initiated by HACB (e.g. moving a person with mobility problems to an apartment with accessible features).
2. Whenever feasible, transfers will be made within a resident's area or other location of the resident's choice.

¹⁶ Resident may challenge any charges for damages by using the HACB Grievance Procedure



C. Priorities for Transfers

The priorities detailed in this section are for all developments except Fireside and the 25 townhouses that will be leased to disabled families.

Transfers will be sorted into their appropriate categories by the Occupancy staff. Offers of apartments will be made in the following order:

- a. Emergency transfers;
- b. Administrative transfers in the following category order:
 - 1) Category 1: Reasonable accommodations for residents with disabilities
 - 2) Category 2: Three sub priorities below:
 - Modernization and Revitalization transfers
 - Problems of violence that are less than life-threatening
 - Serious overcrowding, over-housing, and split families
- c. Incentive transfers;
- d. New Admissions from the waiting list;
- e. Category 3 Administrative transfers

D. Processing Transfers

1. Residents request transfers from managers and managers prepare the paperwork justifying transfers, which is submitted to Occupancy. Occupancy maintains transfer waiting lists and processes transfers for all properties except the Mixed Finance properties. For details on processing, see HACB *Procedure on Transfers*.
2. Within each category, transfer applications will be sorted by the date the completed file (including any verification needed) is received from the manager.
3. When a head of a household, originally housed in a bedroom by him/herself, has or adopts a child, the family will not be approved for an Administrative transfer until the child is three (3) years of age. Exceptions: spouse or partner returns to the apartment, marriage takes place, or family decides to remain in the apartment and the apartment is large enough (using the smallest-unit standard) to accommodate the number of persons now in the household.
4. Split-family transfers will be processed as Category 2 administrative transfers.

E. Residents in Good Standing

1. In general, and in all cases of all incentive transfers, residents will be considered for transfers only if the head of household and other family members and guests under the resident's control:
 - a. Are current on rent without unpaid balance at any time in the past year and must have completed a repayment agreement twelve months from the date of reinstatement;
 - b. Are current on utility payments to HACB or to utility supplier or are current with any repayment agreement with the HACB or utility supplier;



- c. Are in compliance with the terms of the lease and any additional terms required to be added to that lease by Federal law;
 - d. Meet reasonable housekeeping standards and have no housekeeping lease violations as documented by housekeeping inspection reports or work orders reflecting a pattern of damage caused by poor housekeeping; and
 - e. Have not destroyed, defaced, damaged or removed any part of an apartment or the development as documented by housekeeping inspection reports or work orders reflecting a pattern of damage or abuse.
2. Exceptions to the good record requirements may be made for emergency transfers or when it is to HACB's advantage¹⁷ to make the transfer. The exception to the good record requirement will be made by the central transfer administrator taking into account the recommendation by the Manager.
 3. Absent a determination of exception, the following policy applies to transfers:
 - a. If back rent is owed, the resident will not be transferred until a payment plan is established or, if prior payment plans have failed; back rent is paid in full.
 - b. A resident with housekeeping standards violations will not be transferred until he/she passes a follow-up housekeeping inspection.

F. Cost of Transfers

1. HACB will pay the moving costs of all transfers except incentive transfers and those due to changes in family size;
2. Transfers in connection with accessibility, modernization, or revitalization will include moving expenses.

G. Split Family Transfers

1. Certain families will qualify for split family transfers in accordance with HACB's *Transfer Procedure*.
2. Families may qualify for split family transfers through regular annual reexaminations of income and family composition.
3. Generally the following must be true:
 - a. The original family must be both lease compliant and overcrowded; and
 - b. The splitting family must be able to pass applicant screening.
4. The presence of an additional adult family member, with or without children, does not automatically qualify a family for a split family transfer if there is no overcrowding.
5. If a family requests a split and the original family later violates the lease and the family requested a split before the implementation of this procedure or before the lease violation occurred, and the splitting family was not involved in the lease violation and meets all other requirements to split, the split will still be granted.

¹⁷ e.g. a single person is living alone in a three bedroom unit and does not want to move



VI. Annual Reexaminations of Income and Family Circumstances

A. Eligibility for Continued Occupancy

Residents who meet the following criteria will be eligible for continued occupancy:

1. Qualify as a family as defined in Section XII of this policy.¹⁸
2. Are in full compliance with the resident obligations and responsibilities as described in the dwelling lease. **24 CFR § 966.4(f)**
3. Whose family members, age 6 and older, each have Social Security numbers or have certifications on file indicating they have no Social Security number. **24 CFR § 5.216**
4. Who meet HUD standards on citizenship or immigration status or are paying a pro-rated rent **24 CFR § 5.5**
5. Who are in compliance with the HACB's 8 hour per month Community service requirements.¹⁹
6. Who successfully pass an annual criminal history check, in accordance with Section II of this policy.
7. Attend a one time, mandatory Fire Safety Training class.

B. Remaining Family Members and Prior Debt

1. If the head of household dies or leaves the unit, continued occupancy by remaining family members is permitted only if:
 - a. The family reports the departure (or death) of the head of household within 10 days of the occurrence; and
 - b. The family includes a member who can pass screening and is either of legal age to execute a lease or is a Court recognized emancipated minor; and
 - c. The new head signs a new lease within 30 days of the departure of the former head.
2. Remaining family members age 18 years or older will be held responsible for arrearages incurred by the former head or spouse.
3. HACB will not hold remaining family members (other than the head or spouse) responsible for any portion of the arrearage incurred before the remaining member attained age 18.
4. HACB will not hold remaining family members under age 18 for rent arrearages incurred by the former head of household.
5. Household members (i.e., foster children, live-in aides) have no rights as a remaining family member.

¹⁸ For purpose of continued occupancy, remaining family members qualify as a family so long as at least one of them is of legal age to execute a lease. Remaining family members can also include court recognized emancipated minors under age 18

¹⁹ Applicable to certain adults who are neither elderly, disabled, working nor participating in qualifying educational or job training programs



C. Periodic Reexaminations

1. Regular reexaminations: HACB shall, at least once a year, re-examine the family composition and incomes of all resident families in accordance with the *Procedure on Annual Reexamination*, except that families paying Flat Rent shall have their incomes reexamined only every three years **24 CFR § 960.257**
2. Special Reexaminations: When it is not possible to estimate family income accurately, a temporary determination will be made with respect to income and a special reexamination will be scheduled at least every 60 days until a reasonably accurate estimate of income can be made. **24 CFR § 5.609(d)**
3. A special reexamination shall be conducted when there is a change in the head of household that requires a remaining family member to take on the responsibilities of a leaseholder. **24 CFR § 960.257**
4. Zero Income Families: Unless the family has income that is excluded for rent computation, families reporting zero income will have their circumstances examined at least every 60 days until they have a stable income. Monetary or non-monetary contributions from persons not residing in the dwelling unit for any purpose other than the payment or reimbursement of medical expenses shall be considered income. **24 CFR § 5.609**
5. If HACB is terminating the lease of a resident when the resident is scheduled for reexamination, the reexamination will be completed but a new lease will not be executed.
 - a. If HACB prevails in the lease termination action, a new lease will not be executed, and the resident will be evicted;
 - b. If the resident prevails in the lease termination action, a new lease will be executed.
6. If HACB discovers criminal activity by an adult family member when they perform the criminal history check for reexamination, they will begin lease termination action.
7. Action Following Reexamination: If there is any change in rent, the lease will be amended, a new lease will be executed, or a Notice of Rent Adjustment will be issued. **24 CFR § 966.4(a)(3)**
 - a. If any change in the apartment size is required, the resident will be placed on a transfer list in accordance with the transfer criteria described above in this policy and moved to an appropriate apartment when one becomes available. **24 CFR § 966.4(c)(3)**
 - b. The Notice of rent adjustment will include the current rent, the new rent, the date when the new rent takes effect, the reason for the rent adjustment, and the fact that the resident has the right to request a Grievance hearing if he/she disagrees with the new rent.
8. Effective Date of Adjustments
 - a. Residents will be notified in writing of any rent adjustment including the effective date of the adjustment.
 - b. Rent decreases go into effect the first of the month following the report of a change. Income decreases reported or verified after the tenant accounting cut-off date will be effective the first of the second month with a credit retroactive to the first month.
 - c. Rent increases (except those due to misrepresentation) require 30 days notice and become effective the first of the second month.



- d. Rent increases due to misrepresentation are retroactive to the first of the month following the event that was misrepresented or not reported.

VII. Interim Rent Adjustments: Fixed Rent System

A. Adjusting Rent between Regular Reexaminations

1. Residents are required to report all changes in family composition or status to the housing manager within 10 calendar days of the occurrence. Failure to report within the 10 calendar days may result in a retroactive rent increase, but not a retroactive credit or rent reduction. In order to qualify for rent reductions, residents must report income decreases promptly. **Residents are also required to report interim increases in income.**
2. HACB wishes to encourage families to improve their economic circumstances, so most changes in family income between reexaminations will not result in a rent change. HACB will process interim changes in rent in accordance with the chart below:

<u>INCOME CHANGE</u>	<u>HACB ACTION</u>
(a) Decrease in income for any reason, <u>except</u> for decrease that is subject to Imputed Welfare Income rules ²⁰ .	• HACB will process an interim reduction in rent if the income decrease will last more than 30 days. 24 CFR § 5.609
(b) Increase in income following HACB granting of interim rent decrease.	• HACB will process an interim increase for income increases that follow interim rent reductions.
(c) Increase in earned income from the employment of a current household member.	• HACB will either defer the increase to the next regular reexamination or, if the individual is eligible for an earned income disallowance, grant the disallowance. 24 CFR § 960.255
(d) Increase in unearned income (e.g.COLA adjustment for social security).	• HACB will defer the increase to the next regular reexamination.
(e) Increase in income because a person with income (from any source) joins the household.	• HACB will process an interim rent increase.
(f) Increase in monetary or non-monetary income after Resident claimed zero income	• HACB will process an interim rent increase.

3. HACB will process an interim increase in rent only if
 - a. the resident's income increases after the resident was granted an interim decrease in rent; or
 - b. the resident reported zero income and has a verified increase in income (which may be a non-monetary contribution); or

²⁰ Decreases in welfare income resulting from welfare fraud or from cuts for failure to comply with economic self-sufficiency requirements are not eligible for rent reductions (**24 CFR § 5.615**).



- c. the resident has misrepresented or failed to report facts upon which rent is based, so the rent the Resident is paying is less than it should have been.
 - d. HACB will apply any increase in rent retroactive to the month following the month in which the misrepresentation occurred.
4. Complete verification of the circumstances applicable to rent adjustments must be documented and approved by according to HACB *Procedure on Verification 24 CFR § 960.259(c)*
5. HACB will process interim decreases in rent as follows:
 - a. When a decrease in income is reported, and HACB verifies that the decrease will last less than 30 days, an interim adjustment will not be processed.
 - b. Residents reporting decreases in income that are expected to last more than 30 days will have an interim adjustment processed.
6. Residents granted reductions in rent are required to report for special reexaminations at intervals determined by the Manager. Reporting is required until income increases or it is time for the next regularly scheduled reexamination, whichever occurs first.
7. If residents experience a decrease in income from public assistance because their grant is cut for one of the two following reasons, their rent will not be reduced:
 - a. Welfare department has reduced the grant because of welfare fraud; or
 - b. Welfare department has reduced the grant because the family failed to comply with economic self-sufficiency requirements.
8. If a resident challenges the welfare department's reduction of their grant, an interim reduction in rent will be processed until the matter is settled by the welfare department.
9. If the welfare department upholds the grant reduction, the resident shall owe a retroactive rent on the interim rent reduction granted in "c" above.
10. If the welfare department overturns the grant reduction, no retroactive balance is owed.

B. Interim Changes in Family Composition

1. All changes in family composition must be reported within ten days of occurrence. These changes would include:
 - a. Someone listed on the lease leaving the unit;
 - b. Birth, adoption or court-awarded custody of a child;
2. Additions of the following persons must be requested in writing and require written permission from HACB or the manager before the persons may move into the apartment:
 - a. Adult family member (including a new spouse);
 - b. Foster child or children;
 - c. Foster adult;
 - d. Live-in Aide;
 - e. Child in kinship care.



3. All adults who are proposed for addition to a family or household must be screened by the occupancy department, and, with the exception of Live-in Aides, must not overcrowd the unit.

C. Effective Date of Rent Adjustments

Residents will be notified in writing of any rent adjustment including the effective date of the adjustment.

1. Rent decreases go into effect the first of the month following the report of a change. Income decreases reported or verified after the tenant accounting cut-off date will be effective the first of the second month with a credit retroactive to the first month.
2. Rent increases (except those due to misrepresentation) require 30 days notice and become effective the first of the second month.

D. Earned Income Disallowances

1. If a resident goes to work or has new or additional earned income and qualifies under one of the following three criteria, that individual will receive an Earned Income Disallowance (EID) as described below:
 - a. Goes to work after having been unemployed for at least twelve months, or goes to work after having earned less than would be earned working ten hours per week for a fifty week year earning minimum wage; or
 - b. Receives new or increased earned income during participation in an education, job training, or other economic self sufficiency activity; or
 - c. Receives new or increased earned income within six months of having received a cash benefit or in-kind services funded through the program of Temporary Assistance to Needy Families (TANF). If an in-kind benefit (child care, clothing or transportation subsidies for example²¹) was received it must be worth at least \$500 in the past six months.
2. During the first 12 months after the date when the resident qualified for the EID, the resident's rent will not be increased because of the new earned income. Rent during this period will be based on the resident's income before qualifying for the EID plus any increases in unearned income that may occur after qualifying for the EID.
3. During the second 12 months after the date the resident qualified for the EID, the resident's rent will be increased by an amount equal to fifty percent of what the increase would be if not for the EID.
4. The disallowance periods described in number 3 and 4 above only occur while the resident is employed. If the resident stops working for any reason the disallowance stops and resumes again when the resident goes back to work.
5. Even if the full 24 months of disallowance (12 months of full disallowance plus 12 months of 50% disallowance) have not been used, the EID will terminate 48 months from the date when the resident first qualified for the EID.
6. An EID is awarded to a person, not an entire family. More than one adult family member can receive an EID at the same time if they qualify as described under number 1 above.

²¹ Food stamps, Medicaid and social security are NOT considered TANF benefits.



7. No one receives more than one EID in a lifetime.
8. Residents may qualify for a retroactive EID if all the following are true:
 - a. The residents had new or increased earned income and qualified for an EID after 10/1/99; and
 - b. The resident reported the increased income; and
 - c. HACB increased the resident's rent; and
 - d. The resident paid the increased rent.
9. Before the amount potentially owed to a resident for a retroactive rent credit is determined, any amounts owed to HACB by the resident shall be deducted.
10. If a resident qualifies for a retroactive EID as described in "8" above, he/she shall be entitled to the choice of a payment of the retroactive amount due as calculated above, or a prospective rent credit.



VIII. Lease Termination Procedures

A. General Policy: Lease Termination

1. Either HACB or the Resident may terminate tenancy at any time in accordance with all applicable Federal, State and local laws and the lease terms **24 CFR § 966.4(I)**
2. Criminal activity directly relating to domestic violence, dating violence, or stalking shall not be considered cause for eviction of tenant or immediate member of a tenant's family who is a victim of the domestic violence, dating violence, or stalking. Nothing limits HACB from pursuing eviction for other good cause unrelated to the incident or incidents of domestic violence, provided that the victim is not subject to a more demanding standard than non-victims. (42 U.S.C. 13925)

B. Resident-initiated Lease Terminations

1. Resident may terminate tenancy by providing 30 days written notice to HACB or the Manager.

C. HACB-initiated Lease Terminations

1. HACB or its manager terminates the lease only for serious or repeated violations of the material provisions of the lease. **24 CFR § 966.4(I)**
2. Manager shall give written notice of proposed lease termination in the form required by the lease and applicable regulations in English or Spanish, or, in the case of a resident with disability, in the format requested by the resident **24 CFR § 966.4(I)**
3. Notices of lease termination can be served personally, and if posted on the apartment door, shall also be sent to the resident by Certified Mail. Return of the Certified Mail receipt, whether signed or unsigned, shall be considered to be proof that the resident received proper notification.
4. In accordance with the lease and grievance procedure, HACB shall notify Resident in the lease termination notice of Resident's grievance rights if the lease termination is subject to the Grievance Procedure.

Tenant Complaints of Harassment

1. If a tenant comes into any of the management offices complaining about any type of incident with another tenant, the first thing to do is to have the tenant fill out a formal complaint form
2. Second, after the form is filled out completely, the Site Manager or Certified Occupancy Specialist must ask the tenant if the police were called in regards to this incident and if so, so they have the police report?
3. If the answer is YES, retrieve the police report from the tenant or have the Chief of Security retrieve the report from the police department. Retrieving the report should be done within a 48 hour time frame.

Once the report is received by the site office, that information must be forwarded to the In-Counsel Attorney to determine the validity of the claims and what will be the next step in either a mediation session between the tenants or eviction proceedings.

If the answer is NO, the tenant did not call the police in regards to this incident the Site Manager or Certified Occupancy Specialist must contact the Director of Asset Management. The Director of Asset Management must then take the tenant information from the site and forward that information to the



Chief of Security. The Chief of Security must then contact the tenant who made the complaint and transport the tenant if necessary to the police department to make a formal report.

4. In the event the tenant refuses to file a police report after being contacted by the Chief of Security, the Chief of Security must create a report documenting the date and time he spoke to the tenant and that the tenant has refused to file a police report regarding their original complaint. A copy of said report must be submitted to the Site Manager and the Director of Asset Management.

D. Eviction Actions

1. HACB may evict a resident from the apartment only by bringing a Court action.
2. The Sheriff's office or another legally authorized department is the only entity authorized to execute an eviction.
3. If HACB files an eviction action against a resident, the resident will be liable for Court costs, excluding attorney's fees, unless the resident prevails in the action;
4. HACB is not required to prove that the resident knew or should have known that a family member, household member, guest, or other person under the resident's control was engaged in the action that violated the lease.
 - a. The resident may raise as a defense that the resident did not know nor should have known about the action that violated the lease.
 - b. The resident must prove this defense by the preponderance of the evidence.
5. In deciding whether or not to evict for criminal activity HACB may consider all the circumstances of the case, including the seriousness of the offense, the extent of participation by family members and the effect that the eviction would have on family members not involved in the proscribed activity.
6. In appropriate cases, HACB may permit continued occupancy by remaining family members and may impose a condition that the family members who engaged in the proscribed activity will neither reside in nor visit the dwelling unit.
7. HACB may require a resident who has engaged in the illegal use of drugs to present evidence of successful completion of a treatment program as a condition to be allowed to visit and/or reside in the dwelling unit.
8. HACB may require that the remaining family members live in strict compliance with the lease and that the family be placed on probation for an appropriate period of time.

E. Record keeping Requirements

1. A written record of every termination and/or eviction shall be maintained by HACB, and shall contain the following information:
 - a. Name of resident, race and ethnicity, number and identification of apartment occupied;
 - b. Date of the Notice of Lease Termination and any other state or local notices required, which may be on the same form and run concurrently;



- c. For lease terminations for criminal activity, a note in the file with the date, case number and source of information relating to the Notice of Arrest or Notice of the Incident
- d. For "for cause" lease terminations, copies of any occurrence reports, lease violation notices, or other appropriate documentation of the underlying facts surrounding the incident that is the subject of the eviction;
- e. Specific reason(s) for the Notice(s), with section of the lease violated, and other facts pertinent to the issuing of the Notice(s) described in detail;
- f. Date and method of notifying resident; and
- g. Summaries of any conferences held with resident including dates, names of conference participants and conclusions;
- h. Copy of the served Termination Notice;
- i. Copy of any agreed settlement orders;
- j. Copy of any post-judgment agreements.

F. Family Debts Owed to HACB

1. This procedure describes the HACB's policies for the recovery of monies that have been underpaid by families. It describes the methods that will be utilized for collection of monies and the guidelines for different types of debts. It is the HACB's policy to meet the informational needs of families, and to communicate the program rules in order to avoid family debts. Before a debt is assessed against a family, the file must contain documentation to support the HACB's claim that the debt is owed. The file must further contain written documentation of the method of calculation, in a clear format for review by the family or other interested parties.

When families owe money to the HACB will make every effort to collect it. The HACB will use a variety of collection tools to recover, debts including, but not limited to:

- Requests for lump sum payments
 - Civil suits
 - Payment agreements
 - Collection agencies
 - Credit Bureaus
2. A payment agreement as used in this ACOP is a document entered into between the HACB and the Head of Household and spouse, if any, who owes a debt to the HACB in connection with the tenancy. The payment agreement contains details regarding the nature of the debts, the terms of payment, and special provisions of the agreement and the remedies available to the HACB upon default of the agreement.

The maximum amount for which the HACB will enter into a payment agreement with a family is \$2,500.00, except as provided in Section C of this Procedure.



The maximum length of time the HACB will enter into a payment agreement with a family is eighteen (18) months.

3. A payment will be considered to be in arrears if the payment has not been received by the close of the business day on which the payment was due. If the due date is on a weekend or holiday, the due date will be at the close of the next business day.

If the family's payment agreement is in arrears, the HACB will:

- Require the family to pay the balance in full
- Pursue civil collection of the balance due
- Terminate the tenancy

If the family requests a transfer to another unit and has a payment agreement in place and the payment agreement is not in arrears, the family will be permitted to move.

4. Payment Schedule for Monies Owed to the HACB

Initial Payment Due:

<u>(% of Total Amount)</u>	<u>Amount Owed</u>	<u>Maximum Term</u>
25% to 50%	0-\$500	3-6 months
25% to 50%	\$501-\$1,000	6-10 months
25% to 50%	\$1,001-\$2,500	12-18 months

The circumstances in which the HACB will not enter into a payment agreement are as follows:

- a. If the family already has a payment agreement in place; or
- b. If the HACB determines that the debt, due to fraud or failure to report income, is so large that it would take more than in months to repay.

5. Payment agreements will be executed between the HACB and the Head of Household and spouse, if there is one.

Monthly payments may be decreased in cases of hardship with the prior notice of the family verification of the hardship, and the approval of the Site Manager.

No transfer will be approved until the debt is paid in full unless the payment agreement is current and the transfer is the result of the following causes:

- a. Family size exceeds the maximum occupancy guidelines; or
- b. A natural disaster

6. If the family has a payment agreement in place and incurs an additional debt to the HACB, the payment agreement should be amended so that the additional amounts owed by the family will be added to the existing payment agreement.



G. Debts Due to Fraud/Non-Reporting of Information

The definition of "program fraud and abuse" is a single act or pattern of actions that constitutes false statement, omission or concealment of a substantive fact, made with intent to deceive or mislead.

Families, who owe money to the HACB due to the family's failure to report increases in income due to fraud, will be required to repay in accordance with the guidelines for program fraud set forth below.

1. Families who owe money to the HACB due to program fraud will be required to repay the amount in full within ninety (90) days. Failure of the family to report accurate information for rent determination or eligibility to HACB is grounds for eviction.

If a family owes an amount, which equals or exceeds \$2,500.00 as a result of program fraud, the case will be referred to the Inspector General, except as otherwise provided below in Section C of this Procedure. Where appropriate, the HACB will refer the case for criminal prosecution.

2. Families who commit program fraud will be subject to the following procedures except as provided in Section C of this Procedure.
 - a. The maximum time period for payment agreement will be ninety (90) days.
 - b. The family will be required to pre-pay $\frac{1}{2}$ of the amount owed prior to or upon execution of the payment agreement.
 - c. To the extent possible, the amount of the monthly payment will be determined in accordance with the family's current income.

If the family's payment agreement is in arrears, the HACB will make any or all of the following actions:

- a. Require the family to pay the balance in full immediately
 - b. Pursue civil collection of the balance due; or
 - c. Terminate the tenancy
3. In the event of an initiative by HACB or HUD to identify and resolve income discrepancies due to failure or residents to report income, HACB reserves the right to implement a procedure to allow residents to repay the debt without penalty for a limited time. In such case, HACB may enter into repayment agreements for terms longer than 90 days.
4. Debts will be written off if:
 - a. A determination is made that the debtor is judgment proof;
 - b. The debtor is deceased; or
 - c. The debtor is confined to an institution indefinitely or for more than three (3) years.



IX. Utilities

A. Resident-Paid Utilities **24 CFR § 965 & 966.4(b)(2)**

The following requirements apply to residents living in developments with resident-paid utilities:

1. In units with Resident-paid utilities, paying the utility bill in a timely manner is an obligation under the lease and failure to pay in a timely manner is a serious violation of the lease, subject to lease termination. **24 CFR § 960.253(c)(3) and 966.4(b)**
2. If a resident or applicant is unable to get utilities connected because of bad credit or a previous balance owed to the utility company at a prior address, the resident or applicant will not be permitted to move into a unit with resident-paid utilities. **24 CFR § 960.203**
3. When a resident makes an application for utility service in his/her own name, he or she **must** sign a third-party notification agreement for each utility service so that HACB will be notified if the resident fails to pay the utility bill.
4. Each resident will receive a monthly Utility Allowance that reflects a reasonable amount of utilities for the specific size and type of apartment occupied. **24 CFR § 5.609**
5. Residents who pay their utility bills directly and are paying an income-based rent have the amount of rent owed to HACB reduced by the amount of the Utility Allowance. In other words, the resident's Total Tenant Payment, less the Utility Allowance equals the Tenant Rent owed to HACB.
6. When a resident's Total Tenant Payment is less than the utility allowance, HACB will pay a utility reimbursement, equal to the difference between one month's total tenant payment and the utility allowance, to the utility company on the resident's behalf. **24 CFR § 5.632**
7. Residents who have Utility Reimbursements paid directly to the utility company are required to pay the utility supplier for any excess use not covered by the Utility Allowance;
8. If the resident's actual utility bill is less than the Utility Allowance, the resident receives the saving.
9. When the utility supplier offers a "Budget" payment plan, Manager shall suggest that Resident use this plan to protect the resident from seasonal fluctuations in utility bills.
10. HACB may elect to pay the utility reimbursement directly to the utility company.
11. During the annual reexamination, residents with tenant paid utilities must be able to demonstrate that each utility service account is active with the utility provider. "Shut-Off" Notices will not be accepted and the services must be in an adult member's name within the current family composition; however, in the event that the household begins to receive a utility reimbursement from HACB, the utilities must be in the Head of Household's name as any check issued to supplement utility expenses may only be issued to the Head of Household.

B. Excess Utility Charges

1. Check-metered developments or buildings: In buildings that are check-metered, residents shall have consumption-based utility allowances that reflect the size and type of units and actual equipment provided by HACB. Check meters are read by HACB and each tenant charged for consumption in excess of the utility allowance at the rate paid by HACB.



2. In buildings where utilities are not individually metered and there are no check meters, HACB may make excess utility charges for the use of certain resident-supplied appliances in excess of those supplied by HACB. Examples include:

- a. Second refrigerator;
- b. Air conditioner;
- c. Freezer

C. Reasonable Accommodations 24 CFR § 8.4 and 966.7

1. Residents with disabilities may be entitled to higher than normal utility allowances or may not be charged for the use of certain resident-supplied appliances if there is a verified need for special equipment because of the disability.



X. Flat Rents

A. Flat Rents

1. Flat rents are market-based rents.
2. Flat rents vary by apartment size and type and also by development location.
3. Flat rents do not have a utility allowance. An apartment with resident-paid utilities should have a lower flat rent than the same apartment with project-paid utilities.
4. HACB will take the following information into account in developing its Flat rent Schedule:
 - a. Rents of non-assisted rental units in the immediate neighborhood
 - b. Whether utilities are resident-paid or project-paid
 - c. Size of HACB's units compared to non-assisted rental units from the neighborhood
 - d. Age, type of apartment and condition of HACB's units compared to non-assisted rental units from the neighborhood
 - e. Land use in the surrounding neighborhood
 - f. Amenities (childcare, laundry facilities, playgrounds, community rooms, social services, education/ job training programs, etc.) at HACB's properties and in the surrounding neighborhood
 - g. Crime in HACB's developments and the surrounding neighborhood
 - h. Quality of local schools serving each HACB development
 - i. Availability of public transportation at each HACB development
 - j. Availability of accessible units for persons with mobility impairments.

B Update of Flat Rents

1. HACB shall review the Flat Rent structure periodically and adjust the rents as needed.
2. Flat rents may either be increased or decreased based on the market rents as described above.
3. When a resident chooses Flat rent, his/her rent shall be adjusted only at the next regular reexamination/ recertification rather than at the point the Flat rent may change.

C Choice of Rent

1. Once each year, beginning with admission, each family is offered a choice between paying the income-based rent and the Flat rent applicable to the unit they will be occupying.
2. Because of the way the Federal law is written, choice of Flat rent may only be offered at admission and annual reexamination.



D. Recertification of Families on Flat Rents

Families paying flat rents are required to recertify income only every three years, rather than annually, although they are still required to participate in an Annual Reexamination in order to ensure that apartment size is still appropriate, Community Service requirements (if applicable) are met and a Release of Information (Form HUD 9886) is signed by all adult household members. **24 CFR § 960.257 (a)(2)**

E. Hardship Reduction in Flat Rents

1. If a resident who opted for Flat Rent experiences a decrease in income, the Manager will perform an Interim Reexamination of Income.
2. If the reduction in income will last more than 30 days, and the income based rent is lower than the flat rent, the Manager will reduce rent to the income-based rent based on verified income information. **24 CFR § 960.253 (f)**



XI. Determining Income and Rent

A. Annual Income 24 CFR § 5.609

HACB shall use HUD's definition of Annual Income. Should this definition be revised, HUD's definition, rather than that presented below shall be used.

Annual income is the anticipated total income from all sources, including net income derived from assets, received by the family head and spouse (even if temporarily absent) and by each additional family member including all net income from assets for the 12-month period following the effective date of initial determination or reexamination of income, exclusive of income that is temporary, non-recurring, or sporadic as defined below, or is specifically excluded from income by other federal statute. Annual income includes but is not limited to:

1. The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services;
2. The net income from operation of a business or profession, including any withdrawal of cash or assets from the operation of the business. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining the net income from a business. An allowance for the straight-line depreciation of assets used in a business or profession may be deducted as provided in IRS regulations. Withdrawals of cash or assets will not be considered income when used to reimburse the family for cash or assets invested in the business;
3. Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for the straight-line depreciation of real or personal property is permitted. Withdrawals of cash or assets will not be considered income when used to reimburse the family for cash or assets invested in the property;
4. If the Family has Net Family Assets in excess of \$5,000, Annual Income shall include the greater of the actual income derived from all Net Family Assets or a percentage of the value of such Assets based on the current passbook savings rate as determined by HUD;
5. The full amount of periodic payments received from social security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts [See B. 14. below for treatment of delayed or deferred periodic payment of social security or supplemental security income benefits.];
6. Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation, and severance pay (But see paragraph B. 3. below concerning treatment of lump-sum additions as Family assets.);
7. All welfare assistance payments (Temporary Assistance to Needy Families, General Assistance) received by or on behalf of any family member;
8. Periodic and determinable allowances, such as alimony and child support payments, and regular cash and non-cash contributions or gifts received from agencies or persons not residing in the dwelling made to or on behalf of family members; and
9. All regular pay, special pay, and allowances of a family member in the Armed Forces. (See paragraph B. 7. below concerning pay for exposure to hostile fire.)



B. Excluded Income 24 CFR § 5.609

Annual Income does not include the following:

1. Income from the employment of children (including foster children) under the age of 18 years;
2. Payments received for the care of foster children or foster adults (usually individuals with disabilities, unrelated to the resident family, who are unable to live alone);
3. Lump sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance, and worker's compensation), capital gains, one-time lottery winnings, and settlement for personal property losses (but see paragraphs 4 and 5 above if the payments are or will be periodic in nature);

(See paragraph 14. below for treatment of delayed or deferred periodic payments of social security or supplemental security income benefits.)
4. Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member;
5. Income of a live-in aide, provided the person meets the definition of a live-in aide (See Section 12 of these policies);
6. The full amount of student financial assistance paid directly to the student or the educational institution;
7. The special pay to a family member serving in the Armed Forces who is exposed to hostile fire;
8. Certain amounts received that are related to participation in the following programs:
 - a. Amounts received under HUD funded training programs (e.g. Step-up program: excludes stipends, wages, transportation payments, child care vouchers, etc. for the duration of the training);
 - b. Amounts received by a person with disabilities that are disregarded for a limited time for purposes of Supplemental Security Income and benefits that are set aside for use under a Plan to Attain Self-Sufficiency (PASS);
 - c. Amounts received by a participant in other publicly assisted programs that are specifically for, or in reimbursement of, out-of-pocket expenses incurred (special equipment, clothing, transportation, child care, etc.) to allow participation in a specific program;
 - d. A resident services stipend. A resident services stipend is a modest amount (not to exceed \$200/month) received by a public housing resident for performing a service for the HACB, on a part-time basis, that enhances the quality of life in public housing. Such services may include but are not limited to, fire patrol, hall monitoring, lawn maintenance, and resident initiatives coordination. No resident may receive more than one such stipend during the same period of time; and
 - e. Incremental earnings and/or benefits resulting to any family member from participation in qualifying state or local employment training program (including training programs not affiliated with the local government), and training of family members as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for a limited period as determined in advance by the HACB;



9. Temporary, non-recurring, or sporadic income (including gifts);
10. Reparation payments paid by foreign governments pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;
11. Earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of the household and spouse);
12. Adoption assistance payments in excess of \$480 per adopted child;
13. The incremental earnings and benefits to any resident 1) whose annual income increases due to employment of a family member who was unemployed for one or more years previous to employment; or 2) whose annual income increases as the result of increased earnings by a family member during participation in any economic self sufficiency or other job training program; or 3) whose annual income increases due to new employment or increased earnings of a family member during or within six months of receiving state-funded assistance, benefits or services, will not be increased during the exclusion period. For purposes of this paragraph, the following definitions apply:
 - a. State-funded assistance, benefits or services means any state program for temporary assistance for needy families funded under Part A of Title IV of the Social Security Act, as determined by the HACB in consultation with the local agencies administering temporary assistance for needy families (TANF) and Welfare-to-Work programs. The TANF program is not limited to monthly income maintenance, but also includes such benefits and services as one-time payments, wage subsidies and transportation assistance – provided that the total amount over a six-month period is at least \$500.
 - b. During the 12-month period beginning when the member first qualifies for a disallowance, the HACB must exclude from Annual Income any increase in income as a result of employment. For the 12 months following the exclusion period, 50% of the income increase shall be excluded.
 - c. Regardless of how long it takes a resident to work for 12 months (to complete the first exclusion) or the second 12 months (to qualify for the second exclusion), the maximum period for the disallowance (exclusion) is 48 months.
 - d. The disallowance of increased income under this section is only applicable to current residents and will not apply to applicants who have begun working prior to admission (unless their earnings are less than would be earned working ten hours per week at minimum wage, under which they qualify as unemployed).
14. Deferred periodic payments of supplemental security income and social security benefits that are received in a lump sum payment;
15. Amounts received by the family in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit;
16. Amounts paid by a State agency to a family with a developmentally disabled family member living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home;
17. Amounts specifically excluded by any other Federal Statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under the United States Housing Act of 1937. (A notice will be published by HUD in the Federal



Register identifying the benefits that qualify for this exclusion. Updates will be published and distributed when necessary.)

The following is a list of benefits excluded by other Federal Statute:

- a. The value of the allotment provided to an eligible household for coupons under the Food Stamp Act of 1977; **7 USC 2017 (h)**
- b. Payments to volunteers under the Domestic Volunteer Service Act of 1973; **42 USC 5044 (g), 5088**
- c. Examples of programs under this Act include but are not limited to:
 - the Retired Senior Volunteer Program (RSVP), Foster Grandparent Program (FGP), Senior Companion Program (SCP), and the Older American Committee Service Program;
 - National Volunteer Antipoverty Programs such as VISTA, Peace Corps, Service Learning Program, and Special Volunteer Programs;
 - Small Business Administration Programs such as the National Volunteer Program to Assist Small Business and Promote Volunteer Service to Persons with Business Experience, Service Corps of Retired Executives (SCORE), and Active Corps of Executives (ACE).
- d. Payments received under the Alaska Native Claims Settlement Act; **43 USC.1626 (a)**
- e. Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes; **25 USC. 459e**
- f. Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program; **42 USC 8624 (f)**
- g. Payments received under programs funded in whole or in part under the Job Training Partnership Act; **29 USC 1552 (b)**
- h. Income derived from the disposition of funds of the Grand River Band of Ottawa Indians; **P. L. 94-540, 90 State 2503-04**
- i. The first \$2000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the Court of Claims **25 USC 1407-08**, or from funds held in trust for an Indian Tribe by the Secretary of Interior; and **25 USC 117b, 1407**
- j. Amounts of scholarships funded under Title IV of the Higher Education Act of 1965 including awards under the Federal work-study program or under the Bureau of Indian Affairs student assistance programs. **20 USC 1087 uu**
 - Examples of Title IV programs include but are not limited to: Basic Educational Opportunity Grants (Pell Grants), Supplemental Opportunity Grants, State Student Incentive Grants, College Work Study, and Byrd Scholarships.
- k. Payments received from programs funded under Title V of the Older Americans Act of 1965: **42 USC 3056 (f)**
 - Examples of programs under this act include but are not limited to: Senior Community Services Employment Program (CSEP), National Caucus



Center on the Black Aged, National Urban League, Association National Pro Personas Mayores, National Council on Aging, American Association of Retired Persons, National Council on Senior Citizens, and Green Thumb.

- I. Payments received after January 1, 1989 from the Agent Orange Settlement Fund or any other fund established in the In Re Agent Orange product liability litigation;
- m. Payments received under Maine Indian Claims Settlement Act of 1980; **P.L. 96-420,94 Stat. 1785**
- n. The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990; **42 USC 9858q**
- o. Earned income tax credit refund payments received on or after January 1, 1991 **26 USC 32 (j)**
- p. Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation;
- q. Allowances, earnings and payments to AmeriCorps participants under the National and Community Service Act of 1990;
- r. Any allowance paid under the provisions of **38 U.S.C. 1805** to a child suffering from spina bifida who is the child of a Vietnam veteran;
- s. Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act; and
- t. Allowances, earnings, and payments to individuals participating in programs under the Workforce Investment Act of 1998.

C. Anticipating Annual Income **24 CFR § 5.609(d)**

If it is not feasible to anticipate income for a 12-month period, the Authority may use the annualized income anticipated for a shorter period, subject to an Interim Adjustment at the end of the shorter period. For residents that work seasonally (for example, school bus drivers or school cafeteria workers), income received over the seasonal period will be annualized, so that interim adjustments will not be necessary during the summer months.

Mandated Use of Enterprise Income Verification (EIV) Policy 24 CFR § 5.233

1. HACB will utilize the Department of Housing and Urban Development's (HUD) Enterprise Income Verification (EIV) system as a third party verification tool to authenticate a tenant's employment and income during reexaminations and rent interims. This system allows HACB to search within the Multifamily (MF) and Public and Indian Housing (PIH) databases to identify individuals who may be receiving multiple rental subsidies, those who may be recently hired, recently deceased, or to verify citizenship status. This system can also be used to verify a tenant's identity. Therefore, in an effort to reduce administrative and subsidy payment errors, it is imperative that the reports be run on a consistent basis. The following reports need to be run at least once every three (3) months:



- a. New Hires Report
 - b. Multiple Subsidy Report
2. HACB will utilize the Department of Housing and Urban Development's (HUD) Enterprise Income Verification (EIV) system to run the following reports at least monthly:
- a. Deceased Tenant's Report
 - b. Identity Report
 - c. Immigration Report

D. Adjusted Income (24 CFR § 5.611)

Adjusted Income (the income upon which income-based rent is based) means Annual Income less the following deductions and exemptions:

For All Families

1. **Child Care Expenses** — A deduction of amounts anticipated to be paid by the family for the care of children under 13 years of age for the period for which Annual Income is computed, BUT ONLY when such care is necessary to enable a family member to be gainfully employed, to seek employment or to further his/her education. Amounts deducted must be unreimbursed expenses and shall not exceed: (a) the amount of income earned by the family member released to work; or (b) an amount determined to be reasonable by HACB when the expense is incurred to permit education or to seek employment.
2. **Dependent Deduction** — An exemption of \$480 for each member of the family residing in the household (other than the head of household, or spouse, Live-in Aide, foster adult or foster child) who is under eighteen years of age or who is eighteen years of age or older and disabled, or a full-time student.
3. **Work-related Disability Expenses** — a deduction of unreimbursed amounts paid for attendant care or auxiliary apparatus expenses for family members with disabilities where such expenses are necessary to permit a family member(s), including the disabled member, to be employed. In no event may the amount of the deduction exceed the employment income earned by the family member(s) freed to work.

Equipment and auxiliary apparatus may include but are not limited to: wheelchairs, lifts, reading devices for the visually impaired, and equipment added to cars and vans to permit their use by the disabled family member. Also included would be the annualized cost differential between a car and the cost of a van required by the family member with disabilities.

- a. For non-elderly families and elderly or disabled families without medical expenses: the amount of the deduction equals the cost of all unreimbursed expenses for work-related disability expense less three percent of Annual Income, provided the amount so calculated does not exceed the employment income earned.
- b. For elderly or disabled families with medical expenses: the amount of the deduction equals the cost of all unreimbursed expenses for work-related disability expense less three percent of Annual Income (provided the amount so calculated does not exceed the employment income earned) PLUS medical expenses as defined below.



For elderly and disabled families only:

4. **Medical Expense Deduction** — A deduction of unreimbursed Medical Expenses, including insurance premiums, anticipated for the period for which Annual Income is computed.

Medical expenses include but are not limited to: services of physicians and other health care professionals, services of health care facilities, health insurance premiums (including the cost of Medicare), prescription and non-prescription medicines, transportation to and from treatment, dental expenses, eyeglasses, hearing aids and batteries, attendant care (unrelated to employment of family members), and payments on accumulated medical bills. To be considered by HACB for the purpose of determining a deduction from income, the expenses claimed must be verifiable.

- a. For elderly or disabled families without work-related disability expenses: The amount of the deduction shall equal total medical expenses less three percent of annual income.
 - b. For elderly or disabled families with both work-related disability expenses and medical expenses: the amount of the deduction is calculated as described in paragraph 3 (b) above.
5. **Elderly/Disabled Household Exemption** — An exemption of \$400 per household. See Definitions in the next section.
6. **Optional Deductions/Exemptions:** HACB may amend this policy and grant further deductions. Any such deduction would be noted here. HUD does not increase operating subsidy to offset additional deductions.

E. Computing Income-based Rent and Choice of Rent 24 CFR § 5.628

1. Total Tenant Payment (TTP)

- a. The first step in computing income-based rent is to determine each family's Total Tenant Payment.
- b. Then, if the family is occupying an apartment that has tenant-paid utilities, the Utility Allowance is subtracted from the Total Tenant Payment.
- c. The result of this computation, if a positive number, is the Tenant Rent.
- d. If the Total Tenant Payment less the Utility Allowance is a negative number, the result is the utility reimbursement, which is paid directly to the utility company by the HACB.

2. Total Tenant Payment (income-based rent) is the higher of:

- 30% of adjusted monthly income;
- or
- 10% of monthly income;
- but never less than the
- Minimum Rent of \$50



3. Tenant rent

- a. Tenant rent is computed by subtracting the utility allowance for tenant-supplied utilities (if applicable) from the Total Tenant Payment.
- b. In developments where the HACB pays all utility bills directly to the utility supplier, Tenant Rent equals Total Tenant Payment. **24 CFR § 5.634**

4. Minimum Rent

The Minimum Rent shall be \$50 per month.

5. Minimum rent hardship exemption

A hardship exemption shall be granted to residents who can document that they are unable to pay the \$50 because of a long-term hardship (over 90 days). Examples of situations under which residents would qualify for the hardship exemption to the minimum rent are limited to the following: **24 CFR § 5.630**

- a. The family has lost eligibility for or is applying for an eligibility determination for a Federal, State or local assistance program;
- b. The family would be evicted as result of the imposition of the minimum rent requirements;
- c. The income of the family has decreased because of changed circumstances, including loss of employment;
- d. A death in the family has occurred;

Being exempted from paying minimum rent does not mean the family automatically pays nothing. Instead, the family is required to pay the greater of 30% of Adjusted Monthly Income or 10 percent of monthly income.

6. Choice of Rent

At initial certification and at each subsequent annual reexamination the resident shall be offered a choice of paying either the income-based rent or the Flat Rent applicable to the apartment they will be occupying.



XII. Definitions of Terms Used in This Statement of Policies

1. Accessible dwelling units—when used with respect to the design, construction or alteration of an individual dwelling unit, means that the apartment is located on an accessible route and when designed, constructed, altered, or adapted can be approached, entered, and used by individuals with physical disabilities. An apartment that is on an accessible route and is adaptable and otherwise in compliance with the standards set forth in **24 CFR § 8.32 & § 40** (the Uniform Federal Accessibility Standards) is “accessible” within the meaning of this paragraph.

When an individual dwelling unit in an existing facility is being modified for use by a specific individual, the apartment will not be deemed accessible, even though it meets the standards that address the impairment of that individual, unless it also meets the UFAS standards.
2. Accessible Facility - means all or any portion of a facility other than an individual dwelling unit used by individuals with physical disabilities. **24 CFR § 8.21**
3. Accessible Route - For persons with mobility impairments, a continuous unobstructed path that complies with space and reach requirements of the Uniform Federal Accessibility Standards. For persons with hearing or vision impairments, the route need not comply with requirements specific to mobility. **24 CFR § 8.3 & § 40.3.5**
4. Adaptability - Ability to change certain elements in a dwelling unit to accommodate the needs of disabled and non-disabled persons; or ability to meet the needs of persons with different types & degrees of disability. **24CFR § 8.3 & § 40.3.5**
5. Alteration - any change in a facility or its permanent fixtures or equipment. It does not include: normal maintenance or repairs, re-roofing, interior decoration or changes to mechanical systems. **24 CFR § 8.3 & § 8.23 (b)**
6. Applicant – an individual or a family that has applied for admission to housing.
7. Area of Operation - Jurisdiction of HACB as described in state law and HACB’s Articles of Incorporation.
8. Assets - Assets means “cash (including checking accounts), stocks, bonds, savings, equity in real property, or the cash value of life insurance policies. Assets do not include the value of personal property such as furniture, automobiles and household effects or the value of business assets.” See the definition of Net Family Assets, for assets used to compute annual income. **24 CFR § 5.603**
9. Auxiliary Aids - means services or devices that enable persons with impaired sensory, manual, or speaking skills to have an equal opportunity to participate in and enjoy the benefits of programs or activities. **24 CFR § 8.3**
10. Care attendant - a person that regularly visits the apartment of a HACB resident to provide supportive or medical services. Care attendants are not live-in aides, since they have their own place of residence (and if requested by HACB must demonstrate separate residence) and do not live in the public housing apartment. Care attendants have no rights of tenancy.
11. Citizen – Citizen (by birth or naturalization) or national of the United States. **24CFR § 5.504**
12. Co-head of household – One of two persons held responsible and accountable for the family.
13. Community Service Requirements – The performance of voluntary work or duties that benefit the public and that serve to improve the quality of life, enhance resident self-sufficiency, or increase resident self-



responsibility in the community. Community service is not employment and may not include political activities. See HACB *Procedure on Community Service*.

14. Covered Families for Welfare Benefits – Families who receive welfare assistance or other public assistance benefits (welfare benefits) from a state or other public agency (welfare agency) under a program for which federal, state or local law requires that a member of the family participate in an economic self sufficiency program as a condition for such assistance.
15. Covered Person – For the purposes of lease enforcement, covered person means a tenant, any member of the tenant’s household, a guest or another person under the tenant’s control. **24 CFR § 5.A**
16. Dependent - A member of the household, other than head, spouse, sole member, foster child, or Live-in Aide, who is under 18 years of age, or 18 years of age or older and disabled, or a full-time student. **24 CFR § 5.603**
17. Designated Family - means the category of family for whom HACB elects (subject to HUD approval) to designate a project (e.g. elderly family in a project designated for elderly families) in accordance with the 1992 Housing Act. **PL 96-120**
18. Designated housing (or designated project) - a project(s), or portion of a project(s) designated for elderly only or for disabled families only in accordance with **PL 96-106**.
19. Development – The whole of one or more residential structures and appurtenant structures, equipment, roads, walks, and parking lots that are covered by a single contract for federal financial assistance, or are treated as a whole for processing purposes, whether or not located on a common site. **24 CFR § 5.603**
20. Disability Assistance Expenses – Reasonable expenses that are anticipated during the period for which annual income is computed for attendant care or auxiliary apparatus for a disabled family member that are incurred to permit an adult family member (including the person with disability) to be employed, provided that the expenses are not paid to a family member, reimbursed by an outside source, and exceed 3 percent of Annual Income.
21. Disabled Family - A family whose head, spouse or sole member is a person with disabilities. (Person with disabilities is defined later in this section.) The term includes two or more persons with disabilities living together, and one or more such persons living with one or more persons including live-in aides determined to be essential to the care and well being of the person or persons with disabilities. A disabled family may include persons with disabilities who are elderly. **24 CFR § 5.403**
22. Displaced Person – A person who is displaced by governmental action or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or formally recognized pursuant to federal disaster relief laws **24 CFR § 5.403(b)** For purposes of redevelopment activities, a family may also be displaced as defined in the Uniform Relocation Act. Such families have been displaced if they have been required to permanently move from real property for the rehabilitation or demolition of such property. These families may be entitled to specified benefits under the Uniform Relocation Act. **49 CFR § 24.2**
23. Divestiture Income - Imputed income from assets, including business assets, disposed of by applicant or resident in the last two years at less than fair market value. (See the definition of Net Family Assets **24 CFR § 5.603** in this section.)
24. Drug-Related Criminal Activity – The illegal manufacture, sale, distribution, use or possession of a controlled substance with intent to manufacture, sell, distribute, or use the drug. **24 CFR § 5.A**



25. Economic Self-Sufficiency Program – Any program designed to encourage, assist, train, or facilitate the economic independence of HUD-assisted families or to provide work for such families. These programs include programs for job training, employment, counseling, work placement, basic skills training, education, English proficiency, workfare, financial or household management, apprenticeship, and any program necessary to ready a participant for work (including substance abuse or mental health treatment) or other work activities. **24 CFR § 5.603**
26. Elderly Family - A family whose head or spouse (or sole member) is at least 62 years of age. It may include two or more elderly persons living together, and one or more such persons living with one or more persons, including live-in aides, determined to be essential to the care and well-being of the elderly person or persons. An elderly family may include elderly persons with disabilities and other family members who are not elderly. **24 CFR § 5.403**
27. Elderly Person - A person who is at least 62 years of age. **42 USC 1437a(b)(3)**
28. Eligible Immigration Status – For a non-citizen, verification of immigration status eligible for assisted housing consisting of a signed certification and the original copy of an acceptable INS document. **24 CFR § 50508**
29. Emancipated Minor – A person under age 18 who does not live or intend to live with his/her parents, and who has been declared “emancipated” by a court of competent jurisdiction. An emancipated minor is eligible to be a head of household and sign a HACB lease.
30. Extremely Low Income Family – A Family whose Annual Income is equal to or less than 30% of Area Median Income, as published by HUD adjusted for family size.
31. Family - Two or more persons (with or without children) regularly living together, related by blood, marriage, adoption, guardianship or operation of law who will live together in HACB housing; **OR** two or more persons who are not so related, but are regularly living together, can verify shared income or resources who will live together in HACB housing.

The term family also includes: Elderly family (Definition #18), Near elderly family (Definition #32) disabled family (Definition #15), displaced person (Definition #16), single person (Definition #41), the remaining member of a tenant family, or a kinship care arrangement (Definition #25). Other persons, including members temporarily absent (e.g. a child temporarily placed in foster care or a student temporarily away at college), may be considered a part of the applicant family's household if they are living or will live regularly with the family. **24 CFR § 5 and 960**

Live-in Aides (Definition #26) may also be considered part of the applicant family's household. However, live-in aides are not family members and have no rights as “remaining family members”.

Foster Care Arrangements include situations in which the family is caring for a foster adult, child or children in their home who have been placed there by a public child placement agency, or a foster adult or adults placed in the home by a public adult placement agency. These individuals are household members but are not family members and have no rights as “remaining family members”.

For purposes of continued occupancy: the term family also includes the remaining member of a resident family with the capacity to execute a lease.

32. Foster Adult – An adult (usually a person with disabilities) who is placed in someone's home by a governmental agency so the family can help with his/her care. Foster adults may be members of HACB households, but they have no rights as remaining family members. The income received by the family for the care of a Foster Adult is excluded from Annual Income.



33. Full-Time Student - A person who is carrying a subject load that is considered full-time for day students under the standards and practices of the educational institution attended. Educational institution shall include but not be limited to: college, university, secondary school, vocational school or trade school **24 CFR 5.603**
34. Guest – For the purposes of resident selection and lease enforcement, a guest is a person temporarily staying in the unit with the consent of the resident or other member of the household who has express or implied authority to so consent on behalf of the resident. **24CFR § 5.A**
35. Head of the Household - Head of the household means the family member (identified by the family) who is held responsible and accountable for the family.
36. Imputed Welfare Income – The amount of Annual Income by which a resident's welfare grant has been reduced because of welfare fraud or failure to comply with economic self sufficiency requirements that is, nonetheless, included in Annual Income for determining rent. **24 CFR § 5.615(b)**
37. Individual with Disabilities, Section 504 definition **24 CFR § 8.3**

Section 504 definitions of Individual with Handicaps and Qualified Individual with disabilities are not the definitions used to determine program eligibility. Instead, use the definition of person with disabilities as defined later in this section. Note: the Section 504, Fair Housing, and Americans with Disabilities Act (ADA) definitions are similar. ADA uses the term "individual with a disability". Individual with disabilities means any person who has:

- a. A physical or mental impairment that:
 - substantially limits one or more major life activities;
 - has a record of such an impairment; or
 - is regarded as having such impairment.
- b. For purposes of housing programs, the term does not include any individual who is an alcoholic or drug abuser whose current use of alcohol or drugs prevents the individual from participating in the program or activity in question, or whose participation, by reason of such current alcohol or drug abuse, would constitute a direct threat to property or the safety of others.
- c. Definitional elements:

"physical or mental impairment" means any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: Neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; or

Any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term "physical or mental impairment" includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, drug addiction and alcoholism.

"Major life activities" means functions such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working.



"Has a record of such an impairment" means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities.

"Is regarded as having an impairment" means has a physical or mental impairment that does not substantially limit one or more major life activities but that is treated by a recipient as constituting such a limitation; or

Has a physical or mental impairment that substantially limits one or more major life activities only as result of the attitudes of others toward such impairment; or

Has none of the impairments defined in this section but is treated by a recipient as having such an impairment.

NOTE: A person would be covered under the first item if HACB refused to serve the person because of a perceived impairment and thus "treats" the person in accordance with this perception. The last two items cover persons who are denied the services or benefits of HACB's housing program because of myths, fears, and stereotypes associated with the disability or perceived disability.

- d. The 504 definition of disability does not include homosexuality, bisexuality, or transvestitism. Note: These characteristics do not disqualify an otherwise disabled applicant/resident from being covered.

The 504 definition of individual with disabilities is a civil rights definition. To be considered for admission to public housing a person must meet the program definition of person with disabilities found in this section.

38. Kinship care - an arrangement in which a relative or non-relative becomes the primary caregiver for a child or children but is not the biological parent of the child or children. The primary caregiver need not have legal custody of such child or children to be a kinship caregiver under this definition. (Definition provided by the Kinship Care Project, National Association for Public Interest Law) The primary caregiver must be able to document Kinship care, which is usually accomplished through school or medical records.
39. Live-in Aide - A person who resides with an elderly person(s), near elderly person(s) or person(s) with disabilities and who: (a) is determined by HACB to be essential to the care and well being of the person(s); (b) is not obligated to support the family member; and (c) would not be living in the apartment except to provide the necessary supportive services **24 CFR 5.403**
40. Low-Income Household - A family whose annual income does not exceed 80 percent of the median income for the area as determined by HUD with adjusted for smaller family size. **42 USC 1437a(b)**
41. Medical Expense Allowance - For purposes of calculating adjusted income for elderly or disabled families only, medical expenses mean the medical expense not compensated for or covered by insurance in excess of 3% of Annual Income. **24 CFR § 5.603**
42. Minor - A minor is a person less than 18 years of age. An unborn child will not be considered as a minor. (See definition of dependent.) Some minors are permitted to execute contracts, provided a court declares them "emancipated".
43. Mixed Family - a family with both citizen or eligible immigrant members and members that are neither citizens nor eligible immigrants. Such a family will be charged a pro-rated rent. **24 CFR § 5.504**



44. Mixed Population Project - means a public housing project for elderly and disabled families. The HACB is not required to designate this type of project.
45. Multifamily housing project - For purposes of Section 504, means a project containing five or more dwelling units. **24 CFR § 8.3**
46. National – A person who owes permanent allegiance to the United States, for example, as a result of birth in a United States territory or possession. **24 CFR § 5.504**
47. Near-elderly family - means a family whose head, spouse, or sole member is a near-elderly person who may be a person with a disability. The term includes two or more near-elderly persons living together, and one or more such persons living with one or more persons who are determined to be essential to the care or well being of the near-elderly person or persons. A near-elderly family may include other family members who are not near elderly. **24 CFR § 5.403**
48. Near-elderly person - means a person who is at least 50 years of age but below 62, who may be a person with a disability **42 USC 1437a(b)(3)**
49. Net Family Assets - The net cash value, after deducting reasonable costs that would be incurred in disposing of:
24 CFR § 5.603
 - a. Real property (land, houses, mobile homes)
 - b. Savings (CDs, IRA or KEOGH accounts, checking and savings accounts, precious metals)
 - c. Cash value of whole life insurance policies
 - d. Stocks and bonds (mutual funds, corporate bonds, savings bonds)
 - e. Other forms of capital investments (business equipment)

Net cash value is determined by subtracting the reasonable costs likely to be incurred in selling or disposing of an asset from the market value of the asset. Examples of such costs are: brokerage or legal fees, settlement costs for real property, or penalties for withdrawing saving funds before maturity.

Net Family assets also include the amount in excess of any consideration received for assets disposed of by an applicant or resident for less than fair market value during the two years preceding the date of the initial certification or reexamination. This does not apply to assets transferred as the result of a foreclosure or bankruptcy sale.

In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be less than fair market value if the applicant or resident receives important considerations not measurable in dollar terms
50. Other Person Under the Resident's Control - for the purposes of resident selection and lease enforcement means that the person, although not staying as a guest in the unit is, or was at the time of the activity in question, on the premises because of an invitation from the resident or other member of the household who has express or implied authority to so consent on behalf of the resident. Absent evidence to the contrary, a person temporarily and infrequently on the premises solely for legitimate commercial purposes is not "under the resident's control". **24CFR § 5.A**



51. Person with disabilities²² **42 USC 1437a(b)(3)** means a person²³ who —
- a. Has a disability as defined in Section 223 of the Social Security Act **42 USC 423** ;
or,
 - b. Has a physical or mental impairment that:
Is expected to be of long continued and indefinite duration;
Substantially impedes his/her ability to live independently; and,
Is of such nature that such disability could be improved by more suitable housing conditions; or,
 - c. Has a developmental disability as defined in Section 102 (5) (b) of the Developmental Disabilities Assistance and Bill of Rights Act 42 USC 6001 (5).
52. Portion of Development - includes, one or more buildings in a multi-building project; one or more floors of a development or developments; a certain number of dwelling units in a development or developments. **24CFR § 945.105**
53. Refusal of Housing – An applicant’s choice not to accept a HACB offer of housing without good cause.
54. Rejection for Housing – HACB’s determination not to accept an applicant either because of ineligibility or failing applicant screening.
55. Qualified Individual with Disabilities, Section 504 - means an individual with disabilities who meets the essential eligibility requirements and who can achieve the purpose of the program or activity without modifications in the program or activity that the HACB can demonstrate would result in a fundamental alteration in its nature.
- a. Essential eligibility requirements include: ...stated eligibility requirements such as income as well as other explicit or implicit requirements inherent in the nature of the program or activity, such as requirements that an occupant of multifamily housing be capable of meeting the recipient’s selection criteria and be capable of complying with all obligations of occupancy with or without supportive services provided by persons other than the HACB.
 - b. For example, a chronically mentally ill person whose particular condition poses a significant risk of substantial interference with the safety or enjoyment of others or with his or her own health or safety in the absence of necessary supportive services may be “qualified” for occupancy in a project where such supportive services are provided by the HACB as a part of the assisted program. The person may not be ‘qualified’ for a project lacking such services. **24 CFR § 8.3**
56. Service Provider - a person or organization qualified and experienced in the provision of supportive services, that is in compliance with applicable licensing requirements imposed by state or local law for the type of service to be provided. The service provider may be either a for-profit or a non-profit entity.
57. Single Person - A person who is not an elderly person, a person with disabilities, a displaced person, or the remaining member of a resident family.

²² **NOTE:** this is the program definition for public housing. The 504 definition does not supersede this definition for eligibility or admission. **24 CFR 8.4 (c) (2)**

²³ A person with disabilities may be a child



58. Spouse - Spouse means the husband or wife of the head of the household.
59. Tenant Rent - The amount payable monthly by the Family as rent to HACB. If all utilities (except telephone) and other essential housing services are supplied by the HACB, Tenant Rent equals Total Tenant Payment. If some or all utilities (except telephone) and other essential housing services are not supplied by the HACB the cost thereof is not included in the amount paid as rent, and Tenant Rent equals Total Tenant Payment less the Utility Allowance **24 CFR § 5.6**.
60. Total Tenant Payment (TTP) - The TTP is calculated using the following formula:
The greater of 30% of the monthly Adjusted Income (as defined in these policies) or 10% of the monthly Annual Income (as defined in these policies), but never less than the Minimum Rent. If the Resident pays utilities directly to the utility supplier, the amount of the Utility Allowance is deducted from the TTP. **24 CFR § 5.6** See definition for Tenant Rent
61. Uniform Federal Accessibility Standards - Standards for the design, construction, and alteration of publicly owned residential structures to insure that physically disabled persons will have ready access to and use of such structures. The standards are set forth in Appendix A to 24 CFR Part 40. See cross-reference to UFAS in 504 regulations, **24 CFR § 8.32 (a)**.
62. Utilities - Utilities means water, electricity, gas, other heating, refrigeration and cooking fuels, trash collection, and sewerage services. Telephone service is not included as a utility **24 CFR § 965.473**
63. Utility Reimbursement - Funds reimbursed to the utility company on the resident's behalf if the utility allowance exceeds the Total Tenant Payment. Families paying Flat rent do not receive Utility Allowances and, consequently, will never qualify for utility reimbursements.
64. Very Low-Income Family – A very low-income family has an Annual Income less than 50 percent of the median Annual Income for the area, adjusted for family size, as determined by HUD.
65. Welfare Assistance– Welfare or other payments to families or individuals based on need, that are made under programs, separately or jointly, by federal, state or local governments.
66. Work Activities – As used in the HUD definitions at **24 CFR § 5.603** the term work activities means:
- a. Unsubsidized employment;
 - b. Subsidized private sector employment;
 - c. Subsidized public sector employment;
 - d. Work experience (including work associated with the refurbishing of publicly assisted housing) if sufficient private sector employment is not available;
 - e. On-the-job training;
 - f. Job search and job readiness programs;
 - g. Community service programs;
 - h. Vocational educational training (< 12 months)
 - i. Job skills training directly related to employment;
 - j. Education directly related to employment, in the case of a recipient who has not received a high school diploma or certificate of high school equivalency;
 - k. Satisfactory attendance at a secondary school or in a course of study leading to a certificate of general equivalence;



- I. The provision of child care services to an individual who is participating in a community service program.



XIII. HACB COMMUNITY SERVICE POLICY

A. Background

1. HACB is working to enable its residents to become fully economically independent. In support of this goal, HACB is requiring that all non-exempt members of resident families meet monthly targets for neighborhood service or economic self-sufficiency.
2. The Community Service requirement is 8 hours per month for each non-exempt adult (not for each family with a non-exempt adult).
3. Compliance with Community Service activities is monitored by monthly contact between the non-exempt resident and the Manager.

B. Definitions

1. **Community Service** - volunteer work that benefits the property or the local neighborhood includes, but is not limited to:
 - a. Work at a local institution, including but not limited to: school, community center, hospital, hospice, recreation center, senior center, adult day care program, homeless shelter, meals or feeding program, library or bookmobile, before- or after-school education program, or child care center, etc.;
 - b. Work with a non-profit organization that serves HACB residents or their children, including but not limited to: Boy Scouts, Girl Scouts, Boys or Girls Club, 4-H Club, PAL, Garden Center, Neighborhood clean-up programs, Beautification programs, etc.;
 - c. Work with a community arts program involving performing arts, fine arts, visual arts or crafts including but not limited too community theater, dance, music (orchestra, voice, band, small ensemble, etc.) , etc.;
 - d. Work with any program funded under the Older Americans Act, including but not limited to: Green Thumb, Service Corps of Retired Executives, Meals on Wheels, etc.;
 - e. Work with service programs sponsored by churches so long as they do not involve religious education or the practice of religion (e.g. a meals program for the homeless sponsored by a church and provided in the parish hall would be acceptable, teaching Sunday School would not);
 - f. Work with other youth, disability service or advocacy, or senior organizations;
 - g. Work at the property to help improve physical conditions (for example as a grounds or building captain, or on a beautification program for the building or grounds);
 - h. Work at the property to help with children's programs;
 - i. Work at the property to help with senior programs;
 - j. Help neighborhood groups with special projects;



- k. Work through the Resident Association to help other residents with problems, serving as an officer in an RA, serving on the RA or Resident Advisory Board;
 - l. Care for the children of other residents so they may volunteer.
2. Political activity is excluded.
3. Work activity must not take the place of work performed by paid employees.
4. Self Sufficiency Activities - include, but are not limited to:
 - a. Job readiness programs;
 - b. Job training programs;
 - c. Skills training programs;
 - d. Higher education (Junior college or college);
 - e. Vocational education;
 - f. GED classes;
 - g. Verifiable job search activities;
 - h. Apprenticeships;
 - i. Substance abuse or mental health counseling;
 - j. English proficiency or literacy (reading) classes;
 - k. Parenting classes;
 - l. Budgeting and credit counseling;
 - m. Any kind of class that helps a person toward economic independence;
 - n. Carrying out any activity required by the Department of Public Assistance as part of welfare reform.
5. Exempt Adult - an adult member of the family who
 - a. Is 62 years of age or older
 - b. Has a disability that can be verified to prevent him/her from being gainfully employed
 - c. Is verified to be the fulltime caretaker of a disabled person
 - d. Is working at least 30 hours per week
 - e. Qualifies as a full-time student at a secondary school or an institution of higher learning

C. Requirements of the Program

1. Each non-exempt adult in a family paying at least the minimum rent must contribute and document some combination of 8 hours per month of Community service or self sufficiency activity.



2. The 8 hours per month may be either volunteer work or self-sufficiency program activity or a combination of the two.
3. At least 8 hours of activity must be performed each month. An individual may not skip a month and then double up the following month, unless special circumstances warrant special consideration. HACB will make the determination of whether to allow or disallow a deviation from the schedule.
4. Activities must be performed within the neighborhood and not outside the jurisdictional area of the HACB. The exception to this rule would be adults who are enrolled in full-time higher education or vocational training. Their hours of education would count toward the requirement.
5. Family obligations
 - a. At lease execution or re-examination after the effective date of this policy, all adult members (18 or older) of a public housing resident family must
 - 1) provide documentation that they are exempt from Community Service requirement if they qualify for an exemption, and
 - 2) sign a certification that they have received and read this policy and understand that if they are not exempt, failure to comply with the Community Service requirement will result in termination of their lease.
 - b. Once each month non-exempt family members must present a completed documentation form (provided HACB) of activities performed over the previous month to the Manager.
 - c. At each annual re-examination, non-exempt family members must present a completed documentation form (provided by HACB) of activities performed over the previous twelve months. Both forms will include places for signatures of supervisors, instructors, or counselors certifying to the number of hours contributed each month by month.
6. Change in exempt status:
 - a. If, during the twelve (12) month period, a non-exempt person becomes exempt, it is his/her responsibility to report this to HACB and provide documentation of such.
 - b. If, during the twelve (12) month period, an exempt person becomes non-exempt, it is his/her responsibility to report this to HACB and the property manager.
 - c. The Manager will provide the person with the Recording/Certification documentation form and a list of agencies in the neighborhood that provide volunteer and/or training opportunities.

D. HACB obligations

1. To the greatest extent possible and practicable, HACB and its property managers will
 - a. provide names and contacts at agencies that can provide opportunities for residents, including those with disabilities, to fulfill their Community Service/Self Sufficiency obligations;



- b. include a disabled person who is otherwise able to be gainfully employed, since such an individual is not exempt from the Community Service requirement; and
 - c. provide referrals for volunteer work or self-sufficiency programs.
2. The property manager will provide the family with exemption verification forms and Recording/Certification documentation forms and a copy of this policy at initial application and at lease execution.
3. HACB will make the final determination as to whether or not a family member is exempt from the Community Service/Self Sufficiency requirement. Residents may use HACB's Grievance Procedure if they disagree with HACB's determination.
4. Noncompliance of a non-exempt family member
 - a. If a non-exempt adult fails to report to the Manager or fails to complete the required eight hours of neighborhood service or self sufficiency activity, the Manager shall, at the end of the month, report to the district manager.
 - b. When a property manager receives a report of a non-exempt adult's failure to either report or complete the required activity, the property manager shall send a Notice of Lease Violation to the head of household.
 - c. The non-exempt adult will be granted one month to make up any lost hours, properly reported to the Manager.
 - d. If the lost hours are not made up in the subsequent month and verified to the Manager, the Manager shall, at the end of the month, report to the district manager.
 - e. When the district manager receives the report from the Manager of the non-exempt adult's failure to cure, the district manager shall send a Notice of Lease Termination to the head of household;
 - f. If the non-exempt adult who fails to make up the required hours is someone other than the head of household, the remaining family members may retain their tenancy if the noncompliant adult leaves the household;
 - g. The family may use HACB's Grievance Procedure to contest the lease termination.

Pet Policy

This policy was developed after weighing and balancing the interests of HACB's residents, management and its communities surrounding HACB's development and dispersed housing. In accordance with Federal regulations, the HACB will permit pet(s) in specified dwelling sites in accordance with this policy. No exotic, wild or dangerous animals, snakes, farm animals to include chickens and roosters or any other animal not permitted in residential units by state or local laws, ordinances or this policy may be kept by residents.

Public housing residents living in determined site (see Section 3 of this chapter) are permitted to keep no more than 1 dog or 1 cat per unit. The site restrictions do not apply to service animals that assist persons with disabilities, or service animals that accompany visitors to the developments, or elderly residents requiring the companionship of an animal.

A. Registration and Approval

1. Criteria Prior to Admittance

Request for permission to have a pet(s) must be submitted and written approval from HACB must be received *prior* to admittance of pet(s) into the unit. The applicant must provide the site manager proof of ownership, the pet's good health and suitability under the standards set forth in these rules and regulations (Exhibit A), proof of the animal's licensing, vaccination, neutering/spaying and paws de-clawed records, in accordance with state and local laws, etc. (Exhibit B). The licensing and vaccinations must be renewed at the time of resident's re-examination. All licenses and tags must be current. The applicant will be required to complete the following forms:

- Pet Information (see Exhibit A)
- Veterinarian Certification (see Exhibit B)

Upon written approval by HACB, the resident pet owner and HACB must enter into a "Pet Agreement" (Exhibit C) and sign an "Affidavit" (Exhibit D) indicating their understanding of the Pet Policy and their responsibilities before the dog is permitted on the premises and/or the dwelling unit. All pets must be photographed by the HACB.

2. Vaccination Requirements

Dogs and cats must have the proper inoculations required by law and certified by a veterinarian licensed to practice in the State of Connecticut.

All resident pet owners shall attach a tag to the dog or cat's collar showing that the animal has been inoculated with anti-rabies vaccine and has been properly licensed. The dog or cat shall wear the collar at all times.

3. Re-certification

Pet owners are required to recertify their pet with the HACB during their annual re-determinations. The Pet Information and Veterinarian Certification must be renewed.

B. Definitions

A common household "pet" shall mean a domestic animal as defined under state and local law, rule and ordinance; including dogs, cats, birds, fish, rabbits or rodents-such as gerbils, hamsters

or mice. However, the HACB will not allow residents to own, possess or keep a pit bull, German shepherd, Doberman pincher, American bulldog or chow. Common household pets shall not include: ferrets, monkeys, snakes or other reptilian other than turtles and farm animals.

A "service animal" shall mean an animal, which has been trained and certified to provide services to an individual with a disability.

A "dangerous dog" shall mean any dog with a known propensity or disposition to attack, to cause injury to or to otherwise endanger the safety of humans or other domestic animals within, on, or around the development, or any dog that attacks or bites any person or domestic animals within, on or around the development.

HACB means the Housing Authority of the City of Bridgeport, its commissioners, officers, employees, servants and agents.

A "farm animal" may include but is not limited to: chickens, roosters, goats, pigs, horses and cows.

A "common area" means any area to which all residents have access and is not under the direct control of any individual resident (i.e. community rooms, lobby, laundry rooms).

C. Site Restrictions

The HACB recognizes the limited private areas for the following sites and has restricted approval of dogs, except for service animals and pets for the elderly; however, cats and other pets are allowable:

- 1) Charles Greene Homes
- 2) PT Barnum Apartments
- 3) Harborview Towers
- 4) Trumbull Gardens (Buildings 10 and 11)
- 5) Poplar Street Apartments
- 6) Bond Street Apartments
- 7) Boston Commons
- 8) 1810-1812 Stratford Avenue
- 9) Norman Court
- 10) Boston Commons
- 11) Atlantic Street Condominiums
- 12) Tudor Hill
- 13) Pequonnock Towers
- 14) Marlboro Court
- 15) 408 Poplar Street Condominiums

D. Pet Density

- 1) No more than one dog or one cat may be kept in any unit.
- 2) No more than two small, caged birds may be kept in any unit.
- 3) An aquarium for fish may not exceed twenty (20) gallons.
- 4) No more than two (2) small animals, (i.e., gerbils or hamsters) may be kept in any unit. Small animals must be kept in a cage.

E. Size

No pet's mature growth shall exceed 18 inches in height, measured from ground to shoulder, nor weigh more than 30 pounds.

F. Pet Deposit and Fees

- 1) A refundable pet deposit of \$100 will be charged for each dwelling unit where a dog and cat resides. The HACB will place the deposit in an escrow account. The unused portion of the pet deposit will be refunded to the resident along with any accrued interest, within a reasonable time but not more than 30 calendar days after the resident moves from the development or no longer owns or has a pet present in the dwelling unit. The HACB reserves the right to change this deposit amount at any time, consistent with Federal guidelines.
- 2) Resident pet owner's liability for damages caused by his/her pet is not limited to the amount of the pet deposit and the resident will be required to reimburse HACB for the actual cost of any and all damages caused by his/her pet where they exceed the amount of the pet deposit.
- 3) It is a city mandate for pet owners to curb their pet(s). We suggest that pet owners purchase a "pooper scooper" in order to keep the grounds of each site free from pet waste. If HACB has to remove any pet waste from the resident pet owner's unit, yard, porch or other area which is for the exclusive use of the resident or from the common areas, a twenty-five dollar (\$25) charge will be assessed per removal. Repeated violations, three in a one-year period, will necessitate the resident pet owner removing the pet permanently from the premises. Failure to comply may result in the termination of the resident's Dwelling Lease.
- 4) Upon move-out, units occupied by a cat or dog will be inspected by the site manager for an infestation or other damage resulting from the pet. If the unit is found to be infested, the extermination charge will be the responsibility of the resident pet owner. The charges shall be deducted from the pet deposit. If charges exceed the pet deposit, the resident pet owner will be billed and must pay within 30 days of receipt of the bill. The resident is permitted and encouraged to be present for any and all inspections.

G. Pet Rules

1. Dogs, Cats and Other animals

- A. Dogs, cats and other animals shall be maintained within the resident pet owner's unit. When dogs or cats are outside of the unit, they shall be kept on a hand-held leash, cord or chain no longer than six (6) feet and under control at all times. Under no circumstances shall any dog, cat or other animal be permitted to run loose in any common area. A dog shall be deemed running loose when it is on the premises of the resident pet owner, possessor or keeper; but is confined in such a way as to allow the dog to have access to the public right of way.
- B. The unit must be kept free of odors and maintained in a clean and sanitary condition. All animal waste or litter from a cat litter box and cages must be removed daily and disposed of in sealed, plastic trash bags and placed in the trash bins. Under no circumstances should any waste be stored in the unit.

- C. Resident pet owners agree to be responsible for immediately cleaning up any waste, dirt, etc. caused by their pet in the common area, public right of way and their unit. Resident pet owners shall also be responsible for immediately removing and properly disposing of any pet excreta. Animal excrement shall be placed in a closed plastic bag or other closed or airtight nonporous container.
- D. If HACB has to remove any pet waste from the resident pet owner's unit, yard, porch or other area which is for the exclusive use of the resident or from the common areas, a twenty-five dollar (\$25) charge will be assessed per removal. Repeated violations, three in a one-year period, will necessitate the resident pet owner removing the pet permanently from the premises. Failure to comply may result in termination of the resident's Dwelling Lease.
- E. THE HACB IS NOT RESPONSIBLE FOR ANY ACTION, INJURIES OR DAMAGES CAUSED BY ANY RESIDENT'S PET. A PET IS THE SOLE RESPONSIBILITY OF THE PET OWNER. HACB ASSUMES NO LIABILITY FOR FAILURE OF THE RESIDENT PET OWNER TO CONTROL THE PET. ANY INJURY OR HARM TO OTHER PERSONS, PETS OR PROPERTY IS THE SOLE RESPONSIBILITY AND LIABILITY OF THE RESIDENT PET OWNER. IT IS RECOMMENDED THAT RESIDENT PET OWNERS PURCHASE LIABILITY INSURANCE FOR THIS PURPOSE.
- F. Resident pet owners agree to control the noise of their pet(s) so that it does not constitute a nuisance to any other residents, neighbors or people living in the immediate vicinity of the development or dispersed unit. Failure to control pet noise may result in the permanent removal of the pet from the premises. ANY PET WHICH CAUSES UNPROVOKED BODILY INJURY TO ANY RESIDENT, GUEST, STAFF MEMBER, NEIGHBOR OR ANYONE LAWFULLY ON THE PREMISES SHALL BE IMMEDIATELY AND PERMANENTLY REMOVED FROM THE PREMISES, BY THE PROPER AUTHORITIES WITHOUT PRIOR NOTIFICATION.
- G. No dog or cat shall be left unattended in any unit for longer than twelve (12) hours. All hours. All other animals shall not be left unattended for more than twenty-four (24) hours.
- H. All resident pet owners shall provide adequate care, nutrition, exercise and medical attention for their pets. Pets which appear to be poorly cared for or which are left unattended for longer than limits indicated in G above, will be reported to the appropriate authority and removed from the premises at the resident pet owner's expense.
- I. The resident pet owner shall submit to the development office, the names, addresses and telephone numbers of two responsible parties (not living at the same address) who will care for the pet if the resident pet owner, for any reason, is unable to care for the pet. In the event the person is unable or unwilling to accept responsibility, the resident pet owner authorizes the HACB to contact state or local authorities, to enter the unit, remove the pet and place it with such authorities. The HACB will inform the resident pet owner where the pet has been placed. Resident pet owner will have to arrange for

return of the pet. HACB will not be responsible for the well-being of the pet or costs incurred; such charges will be paid by the resident pet owner.

- J. In the event of the death of a pet, the pet must be disposed of pursuant to local ordinances. Dead Animal Collection for the City of Bridgeport should be contacted at (203) 576-7751. Resident pet owner shall not bury the pet on HACB property or dispose of it in any manner inconsistent with local ordinances.
- K. In the event of the death of the pet while the resident pet owner is unable to care for the pet, the resident pet owner agrees the HACB shall have discretion to dispose of the pet consistent with state and local guidelines if the responsible parties listed on Exhibit A are unwilling to take responsibility, or if written instructions with respect to such disposal are not provided to site office in advance by the resident pet owner. Charges for disposal shall be assessed to the resident as damages and will be deducted from the pet deposit.
- L. Resident pet owners acknowledge that other residents may have chemical sensitivities or allergies related to pets and/or easily frightened by such pets. The resident, therefore, agrees to exercise common courtesy with respect to the other resident's right to peaceful and quiet enjoyment of the premises. If using common laundry facilities, it is recommended that the resident pet owner run an additional wash cycle and clean out all filters before leaving the laundry room.
- M. After proper written notification, HACB may require the removal of the pet from the premises on a permanent or temporary basis, in HACB's sole discretion, for the following reasons, by way of illustration not limitation:
 - a. Excessive pet noise or odor after being advised by HACB
 - b. Unruly, intimidating or dangerous behavior
 - c. Excessive damage of the resident's dwelling unit and/or development common areas and/or neighbor's property or people living in the immediate vicinity of the property
 - d. Repeated problems with the pet or any infestation
 - e. Failure of the resident to provide for adequate care of his/her pet
 - f. Leaving a pet unattended for more than the allowed time period
 - g. Failure of the resident to provide adequate and appropriate vaccination of the pet
 - h. Resident's death, serious illness and/or refusal to care for the pet
 - i. Failure to properly clean up after the pet
 - j. Failure to remove the pet will result in a fine of \$25 per day and may result in termination of the resident's Dwelling Lease. After removal of a pet from the premises pursuant to this paragraph, HACB may determine on a case-by-case basis whether the removal of the pet will result in a permanent ban on the pet ownership by the resident.
- N. In the event of an emergency, the resident pet owner gives HACB permission to remove the pet or have it removed from the premises immediately for serious problems including, but not limited to the following:

- a. Pet becomes vicious
 - b. Pet displays symptoms of serious illness
 - c. Pet demonstrates other behavior that constitutes an immediate threat to the health and safety of a resident, guest, staff member, neighbor or other person authorized to be on the premises or people living in the immediate vicinity of the development.
- O. With the exception of a service animal that assists a person with disabilities, pets of visitors/guests are strictly prohibited from entering property.
- P. "Pet sitting" is not permitted for any pet not already residing within the same development and meeting the requirements of this pet policy, state law, or local laws and ordinances.
2. Birds
- A. Birds must be kept caged at all times
 - B. Cages must be cleaned not less than twice a week. Waste must be disposed of in sealed trash bags and placed in the trash bin. Litter shall not be flushed down the toilet.
3. Fish
- A. The aquarium shall not exceed twenty (20) gallons and shall be placed on appropriately sized stand in a safe location within the unit.
 - B. Water damage to walls, carpets, flooring or the ceiling of the unit below caused by breakage or spillage of or from the aquarium shall be the responsibility of the resident pet owner who shall be billed for actual repair costs, as required.
4. Other Animals
- A. Animals of the rodent family (i.e. hamsters and gerbils) must be kept caged at all times.
 - B. Cages must be kept clean.
 - C. Any other issues such as noise, odor and behavior apply the same as for dogs and cats.

H. Notification Policy

In the event that any resident pet owner violates these pet rules and policy, HACB shall provide written notice of such violations as follows:

1. The owner of any pet which creates a nuisance within, on around the development and/or neighborhood or causes excessive noise, odor, unruly or dangerous behavior shall be notified of such nuisance in writing by management and shall be given three (3) days to correct such nuisance. Failure to comply may result in removal of the pet and/or termination of the resident pet owner's Dwelling Lease. If the resident pet owner disagrees, they may request a hearing in accordance with the HACB Grievance Procedure.
2. Dangerous Behavior
 - A. HACB shall provide written notification to the resident pet owner of dangerous behavior and the resident pet owner shall have three (3) days to correct the animal's behavior. It is the responsibility of the resident pet owner to correct the violation. Failure to comply

will result in the removal of the pet and/or termination of the pet owner's Dwelling Lease. If the resident pet owner disagrees, they may request a hearing in accordance with the HACB's Grievance Procedure.

- B. Any pet which causes unprovoked physical harm to any resident, guest, staff member, neighbor or people living in the immediate vicinity of the development or other authorized person present within, on or around the development shall be immediately removed from the premises by HACB without prior written notice to the resident pet owner of the action and location of the pet.

3. Lease Termination

Households who fail to comply with the terms of this policy will be subject to lease termination action according to the Authority's Admissions and Continued Occupancy Policy statement (Chapter 7 Section M) and process of legal notices.

I. Inspection Policy

1. HACB is given permission to enter the resident pet owner's unit for the purpose of inspection if the HACB receives a signed written complaint, or if HACB staff feels the behavior or condition of the pet(s) or resident pet owner warrants same. The inspection will be made during reasonable hours, after proper notice has been given to the pet owner (48 hours' notice). In an emergency situation, entry will be made immediately. Notice will be given the resident pet owner at such emergency entry, giving the reason for such entry.
2. Resident pet owner must be available to physically control his/her pet during the times when HACB employees, agents of HACB or others must enter the unit to conduct housekeeping and preventative maintenance inspections, provide services such as routine work orders or such other times identified in the lease.

EXHIBIT A
Pet Information

This document must be completely filled out and a side-view picture of the pet must be attached before submitting to management. Written approval from HACB must be received before the pet is permitted on the premises and/or in the Dwelling Unit.

Name of Owners: _____

Address: _____

Telephone Number (Work): _____ (Home): _____

Pet Name: _____ Breed: _____

Age: _____ Weight: _____

Markings: _____ Height: _____

License No: _____ Tag Info: _____

Flea Collar Yes _____ No _____

Picture of Pet Yes _____ No _____

If pet is a cat, has it been de-clawed? Yes _____ No _____

Neutered/Spayed? Yes _____ No _____

Veterinarian's Name: _____

Address: _____

Telephone Number: _____

Parties to assume responsibility if you are unable to do so:

(1) Name(s): _____

Address: _____

Telephone Number (Work): _____ (Home): _____

(2) Name(s): _____

Address: _____

Telephone Number (Work): _____ (Home): _____

EXHIBIT C
Pet Agreement

This agreement, entered into this _____ day of _____, _____ by and between the Housing Authority of the City of Bridgeport (HACB) and _____ (Resident) collectively referred to as "the Parties". In consideration of their mutual promises the Parties agree as follows:

1. Resident desires and has received permission from HACB to keep the pet named _____ and described as _____ in the dwelling unit.
2. This agreement is an Addendum to and part of the Dwelling Lease between HACB and Resident executed on _____. In the event of default by Resident, of any of the terms of this Agreement and all succeeding leases, Resident agrees, upon written notice of default from HACB to cure the default within the stated time and/or remove the pet and/or vacate the premises. Resident agrees that HACB may revoke the permission to keep said pet on the premises by giving Resident written notice.
3. Resident agrees to pay HACB a refundable deposit for cats and dogs in the sum of \$100, HACB may use this deposit as is reasonably necessary to take care of any damages or cleaning caused by or in connection with said pet. At the termination of this Agreement, any balance shall be refunded within thirty (30) business days to the Resident. Resident agrees to pay other fees associated with the Pet Policy for damages and non-curbing of pets. The pet deposit must be paid prior to the pet being brought into the unit.
4. Resident agrees to comply with:
 - A. The Pet Policy
 - B. All other applicable government law and regulations such as but not limited to licensing.
5. Resident represents that the pet is quiet and housebroken and will not cause any damage to property or annoy other residents.
6. Resident agrees that the pet will not be permitted outside the resident's unit unless restrained by a leash, cord or chain. Use of the grounds or premises of HACB for sanitary purposes is prohibited except as posted.
7. Resident shall not permit the pet to cause any damage, discomfort, annoyance, nuisance or in any way to inconvenience or cause complaints from any other resident, staff or neighbor. Any soiling created by the pet shall be immediately cleaned up by Resident. If management has to remove any waste from any pet, a twenty-five (\$25) charge will be made. Repeated violations (three) will necessitate removal of the pet permanently from the premises or failure to comply may result in termination of the Dwelling Lease.
8. Resident agrees to immediately remedy any emergency situations involving pet (e.g. attack by pet on staff member, another resident or a guest) as HACB determines. Resident agrees to remedy any nuisance or dangerous behavior within three (3) days.

9. Resident will be financially responsible for any flea or other insect infestation that affects his/her own or adjacent units as a result of his/her pet.
10. Any pet left unattended for twelve (12) hours or more or whose health is jeopardized by the Resident's neglect, mistreatment or inability to care for the animal shall be reported to the appropriate authority. Such circumstances shall be deemed an emergency for the purposes of HACB removing the animal from the premises. HACB accepts no responsibility for any pets so removed.
11. Resident agrees to maintain the pet(s) in a healthy condition and to update the Pet Information form on an annual basis at the time of re-examination.
12. Resident agrees that HACB is in no way responsible nor liable for any action, injuries or damages caused by the resident pet owner's pet. Nor is HACB responsible for the safekeeping or well-being of the pet. A pet is the sole responsibility and obligation of the resident pet owner.
13. Resident has read and agrees to comply with the Pet Policies which are herein incorporated by reference and agrees to comply with such rules and regulation as that are adopted from time to time by HACB in the future.

Manager

Resident

Resident

Date

Date

**EXHIBIT D
Affidavit**

I have read and understand the Family Housing Pet Policy, Pet Agreement, Pet Information and Veterinarian's Certificate of the Housing Authority of the City of Bridgeport and agrees to comply fully with their provisions. I understand that failure to comply may constitute a reason for removal of my pet. If required by management to remove my pet from the premises, I agree to immediately remove any pet and I understand that my failure to do so may constitute grounds for eviction.

I have read and understand the Connecticut State Statute regarding pet ownership. I agree to comply fully with their provisions. I understand that failure to comply with the State regulations may constitute fines and removal of my pet.

Resident

Unit Number

Resident

Address

The above named resident(s) has read and signed the rules in my presence.

HOUSING AUTHORITY OF THE CITY OF BRIDGEPORT

Site Manager

Date



CONNECTICUT LEGAL SERVICES

A PRIVATE NONPROFIT CORPORATION
211 STATE STREET BRIDGEPORT, CT 06604
TELEPHONE (203) 336-3851
FAX (203) 333-4976
E-MAIL BRIDGEPORT@CONNLEGALESERVICES.ORG

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MANAGING ATTORNEY – OFFICE

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NEW BRITAIN, CT 06051

153 WILLIAMS STREET
NEW LONDON, CT 06320

20 SUMMER STREET
STAMFORD, CT 06901

85 CENTRAL AVENUE
WATERBURY, CT 06702

872 MAIN STREET
WILLIMANTIC, CT 06226

SATELLITE OFFICES

2 WEST STREET
DANBURY, CT 06810

5 COLONY STREET
MERIDEN, CT 06451

98 SOUTH MAIN STREET
SOUTH NORWALK, CT 06854

29 NAEK ROAD, SUITE
5AVERNON, CT 06066

June 15, 2012

Nicholas Calace and Commissioners
Bridgeport Housing Authority
150 Highland Avenue
Bridgeport, CT 06604

Re: Comments of Connecticut Legal Services on Administrative Policies

Dear Mr. Calace and Commissioners:

The following are our comments regarding the proposed amendments to the Housing Authority of the City of Bridgeport’s Admissions and Continued Occupancy Policy and one of the proposed amendments to the Section 8 Administrative Plan.¹ We are not yet commenting on any other Section 8 changes or the Public Housing Agency Plan, as we did not receive the documents in time to fully review them.

A. COMMENTS ON “III. RESIDENT PAID UTILITIES POLICY”

Text of proposed amendment:

11. During the annual reexamination, residents with tenant paid utilities must be able to demonstrate that each utility service bill is current; “Shut-Off Notices” will not be accepted and the services must be in the Head of Household’s name or the spouse’s name; however, in the event that the household begins to receive a utility reimbursement from HACB, the utilities must be in the Head of Household’s name as any check issued to supplement utility expenses may only be issued to Head of Household.

CLS Comments:

There are two potential problems with the proposed changes to the resident paid utilities policy. First, the sentence that requires residents to “demonstrate that each utility service bill is current” lacks specificity. This proposed revision does not define what qualifies as a “current” service bill. As a result, it is unclear whether a tenant will be required to demonstrate that his or her service bills are completely paid off with no outstanding balance,

¹ Throughout these comments, the Housing Authority of the City of Bridgeport shall be abbreviated as “HACB” and the Admissions and Continued Occupancy Policy shall be abbreviated as “ACOP”



or whether a tenant could demonstrate that he or she has a balance but is making payments under a repayment program with the utility company, allowing the tenant to maintain utility service.

Second, requiring that “services must be in the Head of Household’s name or the spouse’s name...” is problematic because such a policy exceeds the HACB’s legal authority under state law. Conn. Gen. Stat. § 47a-9 states that “A landlord...may adopt a rule or regulation...only if (1) the purpose of the rule or regulation is to promote the convenience, safety or welfare of the tenants in the premises, preserve the landlord's property from abusive use or make a fair distribution of services and facilities held out for all the tenants generally...” It is our belief that the HACB’s proposed rule that utilities must be obtained in the name of the head of household does not promote the convenience, safety, or welfare of the tenants in the premises. On the contrary, adopting such a rule could potentially cause inconvenience or safety hazards to residents.

For example, some tenants may choose to place utility services in the name of someone other than the head of household or spouse in order to avoid a utility shut-off. Other tenants may do so because they wish to avoid protracted negotiations with the utility company over past debts or repayment plans. Such conduct, although perhaps unwise or short-sighted on the part of residents, is often the easiest practical solution for residents to keep service on. Moreover, such conduct by tenants is not illegal in Connecticut.

In contrast, the HACB’s proposed policy limits residents’ independence and autonomy because tenants will not be able to designate a person of their choosing in whom to place utility services. It also does not promote any convenience to tenants, either for the tenants directly affected by the policy or for others in the building. It also increases, at the margin, the possibility that tenants will lose utility service as a result of falling behind on their utilities, receiving a shut-off notice, and losing service after choosing to keep service in their own names as a way to avoid an eviction by the HACB under this proposed policy. It is not uncommon for low-income tenants to struggle to avoid a utility shutoff even though it is possible to negotiate a repayment plan with the utility service provider. Most public housing residents simply do not have the wherewithal to solve a utility service issue via negotiating a repayment plan. Rather, most public housing resident will probably resort to the simple, albeit crude, method of simply placing service in another person’s name other than the head of household.

In fact, HUD explicitly contemplates the possibility that public housing residents may have, for limited periods of time, their utility services in a different name than the head of household. For example, the Public Housing Occupancy Guidebook sets out a number of requirements and suggestions for residents living in developments with resident-paid utilities. See Public Housing Occupancy Guidebook (June 2003) ¶ 14.1. Among the suggestions is to have PHAs pay residents’ overdue utility bills and have service switched to the PHA account to “avoid having utilities disconnected.” HUD recognizes that this practice is typically a short term arrangement because non-payment of utilities is cause for eviction. Switching the service from the resident’s name to the PHA prior to the eviction prevents “the pipes in the unit from freezing or, much worse, a fire caused by some makeshift arrangement to keep the unit warm.” A revision

that requires that services are in the head of household's name or spouse's name makes this tactic impossible.

At the same time, the HACB's proposed rule does not appear to be justified as a means to preserve the its property from abusive use, either. Instead, the property will be at a greater risk of safety hazards resulting from disconnected utilities. Because the revised rule does not meet the state's requirements, it goes beyond HACB's legal authority so should not be implemented.

B. COMMENTS ON "IV. REASONABLE ACCOMODATIONS POLICY"

Text of proposed amendment:

14. Assistance animals are those that assist persons with disabilities in the activities of independent living. Under equal housing opportunity laws, an assistance animal is one that assists or benefits a person with a disability by affording such person the equal opportunity to use and enjoy his or her dwelling. This includes not only assistance, but also emotional support animals. The assistance animal must be licensed, certified and/or trained by a state or local government or a training program to provide assistance to personal with disabilities. The animal's size and pet deposit provisions are waived.

PHA applicants/tenants with disabilities have the right to have an assistance animal as a reasonable accommodation. To best manage these reasonable accommodation requests, the PHA has developed an Assistance Animal Policy which details the assistance animal reasonable accommodation processes and policy.

CLS comments:

The proposal revises the ACOP and Reasonable Accommodations Policy to require that assistance animals must be licensed, certified and/or trained.² Put succinctly, this appears to be contrary to law. Accommodation of both assistance animals and emotional support animals as reasonable accommodation is required by both the Fair Housing Act and Section 504 of the Rehabilitation Act. The Public Housing Occupancy Guidebook addresses this issue most clearly in ¶16.1, which states that "[a] PHA may not refuse to allow a person with a disability to have an assistance animal merely because the animal does not have formal training."

Additionally, this amendment is incorporated into the HACB's existing policy that states that the policy applies as well to emotional support animals. It is unclear from the new language whether or not the HACB intends to apply the certification and training requirement to emotional support animals as well. If it does, that provision would appear to violate HUD fair housing regulations in an additional manner, since support animals have no training. Although the U.S. Department of Justice has issued regulations describing certification requirements of assistance animals under Title II of the ADA, Nondiscrimination on the Basis of Disability in State and Local Government Services, Final Rule, 75 Fed. Reg. 56164 (Sept. 15, 2010), HUD has issued

² We are not aware of any government licensing or certification process in this state or city.

guidance making it clear that emotional support animals must be accommodated under the Fair Housing Act and Section 504. See Memorandum from Sara K. Pratt, Deputy Assistance Secretary for Enforcement and Programs, February 17, 2011, attached. If it is the HACB's intention only to require evidence of training of *assistance animals*, (if HUD were to permit such a requirement) in order to comply with law the proposed language must be revised to make clear that it would explicitly exclude any such requirement for *emotional support animals*.

HUD explained its position in its commentary to the publication of the final rule establishing the general pet ownership rules, Pet Ownership for the Elderly and Persons With Disabilities, Final Rule, 73 Fed. Reg. 63834-38 (Oct. 27, 2008), attached. The supplementary information states:

Finally, the Department believes that removing the animal training requirement ensures equal treatment of persons with disabilities who need animals in housing as a reasonable accommodation, for a wide variety of purposes. While many animals are trained to perform certain tasks for persons with disabilities, others do not need training to provide the needed assistance. For example, there are animals that have an innate ability to detect that a person with a seizure disorder is about to have a seizure and can let the individual know ahead of time so that the person can prepare. This ability is not the result of training, and a person with a seizure disorder might need such an animal as a reasonable accommodation to his/her disability. Moreover, emotional support animals do not need training to ameliorate the effects of a person's mental and emotional disabilities. Emotional support animals by their very nature, and without training, may relieve depression and anxiety, and/or help reduce stress-induced pain in persons with certain medical conditions affected by stress.

73 Fed. Reg. 63836

A federal court has ruled on this issue, citing the HUD commentary, Overlook Mut. Homes, Inc. v. Spencer, 666 F.Supp.2d 850 (S.D. Ohio 2009), attached, concluding that under the Fair Housing Act, emotional support animals, which need not be individually trained, qualify as reasonable accommodations. 666 F.Supp.2d 861.

The proposed clarification that the animal's size and pet deposit provisions are to be waived puts the HACB's policy in compliance with the regulations and the fair housing laws.

C. COMMENTS ON "V. REASONABLE ACCOMODATIONS POLICY"

[We assume that this heading is a typographical error, as the topic is not reasonable accommodation but accommodation of non-English speakers.]

Text of proposed amendment:

4. *At all HACB offices a notice will be available that states the Bridgeport office of*

the International Institute of Connecticut, Inc. can provide translation in other languages if HACB staff do not speak the appropriate language and the applicant or resident cannot provide their own translator.

5. Applicants and residents with low English comprehension may furnish an interpreter to assist in communication with HACB. For applicants and residents who speak Spanish, HACB will provide translation services if requested by applicant.

CLS comments:

We wish to point out that this policy proposal does not give any guidance to staff about allowing the resident or applicant to bring any person he or she chooses to interpret. This fails to take into account HUD's strong concerns regarding questions of competency, confidentiality, or conflict when a family member or particularly, a child, is expected to interpret. "Generally, recipients should not rely on family members, friends of the [limited English proficient or "LEP"] person, or other informal interpreters." Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 72 Fed. Reg. 2731 (Jan. 22, 2007), at p. 2752.

Recipients should take special care to ensure that family, legal guardians, caretakers, and other informal interpreters are appropriate in light of the circumstances and subject matter of the program, service, or activity, including protection of the recipient's own administrative or enforcement interest in accurate interpretation. In many circumstances, family members (especially children) or friends are not competent to provide quality and accurate interpretations. Confidentiality privacy, or conflict-of-interest issues may also arise. LEP persons may feel uncomfortable revealing or describing sensitive, confidential, or potentially embarrassing medical, law enforcement (e.g., sexual or violent assaults), family, or financial information to a family member, friend, or member of the local community. P. 2743.

We assume that the HACB has tested the competence of the oral and written interpretation of any employee who may be asked to interpret and that the employee has been trained in confidentiality expectations.

We wish to also note that the HACB does not seem to be providing vital written materials in Spanish, as required by the Guidance, at p. 2744. Our office sees clients who are not proficient in English who have received termination notices or notices regarding income and family composition reporting requirements who may have failed to act properly because they were not properly notified. The HACB should have these documents in Spanish language forms and should be using them for any household in which there is any uncertainty about the head of household's reading proficiency in English.

D. COMMENTS ON “VI. ADDITIONS TO AND DELETIONS FROM THE RESIDENT FAMILY AND HOUSEHOLD POLICY”

Text of proposed amendment:

3. Any added or requested “adult” must be part of the leaseholder’s immediate family (son or daughter). In addition, the added or requested adult cannot add subordinate family (son, daughter, or legal guardian of requested additional member(s)).

CLS comments:

This proposal improperly limits the adults that may be added to a tenant’s household. The limitation to a son or daughter excludes, for example, adult grandchildren who might otherwise live with their grandparents. The proposed revision seems to adhere to traditional notions of “family” as limited to the nuclear family. This unduly restricts the definition of “family” beyond the definitions found in statutory, regulatory and case law. Thus, we suggest that the proposed language be rejected.

Federal law has consistently defined “family” broadly. See 42 U.S.C. § 1437a(b)(3); 24 C.F.R. § 5.403. A PHA’s definition of the term “family” must comply with federal law. See the Public Housing Occupancy Handbook ¶ 2.2 (“PHAs may not alter the definitions that are included in HUD’s regulations.”). HUD incorporated a broad definition of “family” exactly because it contemplated the “admission of, for example, two unrelated young mothers who want to share housing because they work different shifts and can save money on child care costs by sharing an apartment.”

Supreme Court cases have protected this broad definition of “family.” The best known case is Moore v. City of E. Cleveland, Ohio, 431 U.S. 494 (1977), attached, in which the court held that an ordinance that limited occupancy of a dwelling to a single family, and defined family in a narrow way that prevented a grandmother from living with her two grandsons was unconstitutional. The court noted a reason for maintaining “a larger conception of the family”: “[e]specially in times of adversity, such as the death of a spouse or economic need, the broader family has tended to come together for mutual sustenance and to maintain or rebuild a secure home life.” This seems to underscore the fact that PHAs may not narrow the definition.

Here, the HACB’s proposal mirrors the type of limit held unconstitutional in Moore. This not only goes against the “roots . . . deserving of constitutional recognition” but undermines the reality that many public housing participants are in exactly the types of adverse situations that the court envisioned would lead to the coming together of the “broader family.” The HACB’s proposal strikes at this constitutional right by arbitrarily deciding who may and may not be legally added and goes against what Congress and HUD require. Thus, the HACB would be violating the regulations as well as the Constitution if it proceeded with this proposed change.

Text of proposed amendment:

3. Any adult family member that has been removed from the family composition will not be added back onto the family composition.

CLS comments:

No authority exists allowing a PHA to deny a former household member who has moved out an opportunity to be added back to the household. This is particularly true when doing so would not affect the unit size. The HACB's proposed restriction is also worrisome because it is an unconditional restriction—there are no scenarios in which a previously-removed adult family member could be re-added to the family composition. Given these problems, this proposed change would likely be an arbitrary and unconstitutional limit on family choice.

The restriction also effectively requires the automatic “blacklisting” of certain people from ever rejoining a family. Under this rule, a son who leaves the family to live on his own, but who later returns because financial hardship or disability that prevents him from sustaining himself independently, would be prohibited from rejoining the family. This seems particularly inappropriate in this economy, which has forced many adult children to move back into their childhood home because of the limited economic opportunities.

Similarly, the proposal that provides that when the new family member is added to the family composition, the additional adult member must reside within the household for a minimum of three years in order to be eligible to become Head of Household is likely illegal in restricting the family's right to self-determination. The decision as to who may become head of household is not one that a PHA should arbitrarily determine. 24 C.F.R. § 5.403 defines “family” to include the “remaining member of a tenant family.” Read in conjunction with 24 C.F.R. § 966.4(d)(1) and 24 C.F.R. § 5.100, this regulation gives the remaining family member all the statutory and constitutional rights of other residents. Thus, by cutting back on those rights, this sentence is likely illegal.

No authority exists allowing the HACB to require a three-year waiting period before a family member may become head of household. As mentioned above, family choice is one of the rights recognized by constitutional, statutory and regulatory law. Even if one were to view the three-year waiting period as constitutional, the proposal seems inappropriate given the current state of the economy. Such a long waiting period prevents a family from readjusting to changing circumstances. This would jeopardize the ability of many families to remain a unit. This inflexibility runs against the declaration of policy outlined in 42 U.S.C. § 1437, which has as one of its goals the “prov[ision of] decent and affordable housing for all citizens.” The HACB's proposed revision goes too far.

Text of proposed amendment:

4. Remaining family members may remain within the unit and become Head of Household only when the Head of Household passes or is institutionalized (i.e., convalescent home, nursing home, or assisted care) and the remaining family, upon re-execution of the lease, must agree to transfer into the next available unit, in accordance to the Occupancy Guidelines Policy.

CLS comments:

This proposed provision has the same problems as the previous ones. It likely unconstitutionally restricts the rights of a “remaining family member” by allowing him or her to become a head of household only in very limited circumstances (i.e. the head’s passing or institutionalization). The regulations do not contain any exceptions, so the HACB may not adopt its own.

E. COMMENTS ON SECTION 8 ADMINISTRATIVE PLAN “L. PARTICIPANTS PAID UTILITIES” ON PAGE 56 OF 200

Text of proposed amendment:

L. The following requirements apply to participants living in units or developments with resident-paid utilities or applicants being admitted to such developments: Participants/applicants must obtain utility services in Head of Household or Co-head’s name. Paying the utility bill is the resident’s obligation under the lease. Failure to pay utilities is grounds for eviction.

CLS comments:

Requiring Section 8 voucher participants and applicants to “obtain utility services in Head of Household or Co-head’s name” exceeds the HACB’s authority. The federal regulations governing the Section 8 voucher program do not allow for termination of participants (or denial of admission of applicants) except in those circumstances identified in 24 C.F.R. §§ 982.552 and 982.553, including the list of family obligations outline in 24 C.F.R. § 982.551, none of which include failing to obtain utility services in the name of a head of household or co-head’s name.

Similarly, 24 C.F.R. § 982.404 states that “the family is responsible for a breach of the HQS that is caused by any of the following: (i)The family fails to pay for any utilities that the owner is not required to pay for, but which are to be paid by the tenant...” While a family or tenant is responsible for failure to pay, there is no indication anywhere that the source of the payments is relevant.

24 C.F.R. § 982.308 states that a lease for a Section 8 tenant must include “A specification of what utilities and appliances are to be supplied by the owner, and what utilities and appliances are to be supplied by the family.” The term “family” suggests that utility services can be obtained by more than just the Head of Household or Co-head. HUD defines “family” as “A person or group of persons... approved to reside in a unit with assistance under the program.” 24 C.F.R. § 982.4. Under this definition, family would include, among others, children, grandchildren, and grandparents. Based on this, it seems that the revision above unnecessarily narrows Section 8 participants’ utility payment options by excluding all other family members living on the premises.

The Housing Choice Voucher Program Guidebook also describes the possible reasons for a termination of Section 8 assistance. See Housing Choice Voucher Program Guidebook (April 2001) ¶ 15.4. Obtaining utilities through a different name is not a legally adequate reason for termination. Id. Implementation of this revision would therefore be inconsistent with HUD’s requirements for Section 8 termination.

Participants in the Section 8 Voucher Program struggle to make payments because of their economic circumstance. Implementing a revision that provides an even narrower window to meet payment requirements does not seem beneficial. Deference should be given to the extreme importance of keeping utilities in service in order to maintain safe living environments. Because the federal regulation states that an entire family can be responsible for providing utility payments, it does not make sense to limit our Section 8 participants’ ability to obtain services to only Heads and Co-heads of Households.

Conclusion

Thank you for the opportunity to comment. If you wish to discuss any of these items, please do not hesitate to call our office.

Very truly yours,

Richard L. Tenenbaum
Aaron P. Wenzloff
Jongwook Kim
Cynthia Reed

Attachment

**RECOMMENDATIONS OF THE RESIDENT ADVISORY BOARD
TO THE HACB 2012-2013 ANNUAL PLAN**

The participation of the Resident Advisory Board (RAB) in the development of the Annual and Five Year Plan of the Housing Authority of the City of Bridgeport (HACB) is very important and begins at the initial state of the planning process. The RAB members consist of the presidents of the following complexes: Marina Village, Trumbull Gardens, Scattered Sites I and II, Harborview Towers, P.T. Barnum Apartments, Charles F. Greene Homes and Fireside Apartments.

Kimberly Ford, HOPE VI Coordinator, from the Planning, Modernization and Development Department and Annual Plan Coordinator, attended RAB meetings that were held on the following dates: May 23 and June 6, 2012, attended by Donna F. Brown, James Brown, Hadassah Nightingale, Betti Cooke, Denise Taylor-Moye, Geraldine McCallaster, Alice King, Catherine Stewart and Gaytoria Smith.

The RAB members were concerned about the potential reduction of funding to the Capital Fund Program and how the reductions would affect the physical needs at their sites. Staff discussed with the residents the anticipated cuts to its federal allocation, made initial recommendations to the residents, and assured residents that HACB is committed to working with the residents to ensure that the HACB would prioritize the capital improvements activities. In addition to new projects, the recommendations include projects that were not completed in the 2011 fiscal year. RAB members were in agreement with the staff recommendations.

The Director of the Legal Services Department Jennifer Black met with the RAB on May 23, 2012 to discuss the revisions to the HACB Admission and Continued Occupancy Plan (ACOP). The proposed policy changes falls under different categories in accordance with the current ACOP.

- **Chapter XI Mandated Use of Enterprise Income Verification (EIV) Policy, Article C Anticipating Annual Income** HACB would use the EIV system as a third party verification tool to authenticate a tenant's employment and income during reexaminations and rent interims.
- **Chapter II Eligibility for Admission and Process of Application, Article C Qualifying for Admissions Policy:** d. Provide documentation of Social Security Numbers for all family members, or certify that they do not have Social Security Numbers.
- **Chapter IX Utilities, Article A Resident Paid Utilities:** No. 11. During the annual reexamination, residents with tenant paid utilities must be able to demonstrate that each utility service bill is current; "Shut-Off Notices" will not be accepted and the services must be in the Head of Household's name or the spouse's name; however, in the event that the household begins to receive a utility reimbursement from HACB, the utilities must be in the Head of Household's

name as any check issued to supplement utility expenses may only be issued to Head of Household.

- **Chapter I Nondiscrimination, Article B Reasonable Accommodation Policy No. 14:** Assistance animals are those that assist persons with disabilities in the activities of independent living...The assistance animal must be licensed, certified and/or trained by a state or local government or a training program to provide assistance to persons with disabilities. The animal's size and pet deposition provisions are waived.
- **Chapter I Nondiscrimination, Article C Providing Information in Languages other than English: No. 4** At all HACB offices a notice will be available that states the Bridgeport office of the International Institute of Connecticut, Inc. can provide translation in other languages if HACB staff do not speak the appropriate language and the applicant or resident cannot provide their own translator.
- **Chapter I Nondiscrimination, Article C Providing Information in Languages other than English: No. 5** Applicants and residents with low English comprehension may furnish an interpreter to assist in communication with HACB. For applicants and residents who speak Spanish, HACB will provide translation services if requested by applicant.
- **Chapter IV Leasing Policies, Article C Additions to and deletions from the Resident Family and Household, No. 2:** Generally HACB will approve the addition of other family or household members when that individual passes screening and does not over crowd the family. The word "addition" will be applied to the following circumstances: resident plans to marry, resident is awarded custody of a child over the age for which juvenile justice records are available, resident desires to add a new family member to the lease, resident desires to employ a live-in aide, resident desires to take in a foster child(ren), a unit is left occupied by a "remaining family member(s)
- **Chapter IV Leasing Policies, Article C Additions to and deletions from the Resident Family and Household, No. 3:** Any added or requested "adult" must be part of the leaseholder's immediate family (son or daughter). Added or Requested adult can't add subordinate family or legal guardian. Any adult family members that have been removed from family composition will not be added back. When a new family member is added to the family composition, the additional adult member must reside within the household for a minimum of three (3) years in order to be eligible to become Head of Household.
- **Chapter IV Leasing Policies, Article C Additions to and deletions from the Resident Family and Household, No. 4:** Remaining family members may remain within the unit and become Head of Household only when the Head of Household passes or is institutionalized and the remaining family, upon re-execution of the lease, must agree to transfer into the next available unit, in accordance to the Occupancy Guidelines Policy.

RAB MEMBERS

Betti Cooke – Scattered Sites
Geraldine McCallaster – Scattered Sites
Donna F. Brown – Eleanor/Franklin
Denise Taylor Moye – Marina Village Apartments
Alice King – Charles F. Greene Homes
Gatoria Smith – Charles F. Greene Homes
Hadassah Nightingale – Harborview Towers
Catherine Stewart - Harborview Towers
Carolyn Mobsby – Fireside Apartments
Karen Bracey – Trumbull Gardens Apartment

Resident Membership of the HACB Board of Commissioners

James Brown is the Resident Commissioner for the Board of Commissioners. Mr. Brown's current term has expired. However, based on the recommendation of the HACB RAB board, he will be reappointed by the Mayor and is currently going through the process.

HOUSING AUTHORITY OF THE CITY OF BRIDGEPORT



HOUSING CHOICE VOUCHER PROGRAM

ADMINISTRATIVE PLAN

Effective June, 2012

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**HOUSING AUTHORITY OF THE CITY OF BRIDGEPORT
ADMINISTRATIVE PLAN FOR THE SECTION 8 HOUSING CHOICE VOUCHER
PROGRAM**

I. The HCV Administrative Plan

A. Overview and Purpose of the Plan

The Administrative Plan is required by HUD. The purpose of the Administrative Plan is to establish policies for carrying out the programs in a manner consistent with HUD requirements and local goals and objectives contained in HACB's agency plan. This Administrative Plan is a supporting document to HACB agency plan, and is available for public review as required by CFR 24 Part 903.

This Administrative Plan is set forth to define HACB's local policies for operation of the housing programs in the context of federal laws and regulations. All issues related to Section 8 not addressed in this document are governed by such federal regulations, HUD handbooks and guidebooks, notices and other applicable law. The policies in this Administrative Plan have been designed to ensure compliance with the consolidated ACC and all HUD-approved applications for program funding.

HACB is responsible for complying with all changes in HUD regulations pertaining to the HCV program. If such changes conflict with this plan, HUD regulations will have precedence.

Administration of the HCV program and the functions and responsibilities of HACB staff shall be in compliance with HACB's personnel policy and HUD's Section 8 regulations as well as all federal, state and local fair housing laws and regulations.

B. Contents of the Plan (24CFR 982.54)

HUD regulations contain a list of what must be included in the Administrative Plan.

HACB Administrative Plan must cover HACB policies on these subjects:

- Selection and admission of applicants from HACB waiting list, including any HACB admission preferences, procedures for removing applicant names from the waiting list, and procedures for closing and reopening HACB waiting list;
- Issuing or denying vouchers, including HACB policy governing the voucher term and any extensions or suspensions of the voucher term. 'Suspension' means stopping the clock on the term of a family's voucher after the family submits a request for approval of the tenancy. If HACB decides to allow extensions or suspensions of the voucher term, HACB Administrative Plan must describe how HACB determines whether to grant extensions or suspensions, and how HACB determines the length of any extension or suspension;
- Any special rules for use of available funds when HUD provides funding to HACB for a special purpose (e.g., desegregation), including funding for specified families or a specified category of families;

- Occupancy policies, including definition of what group of persons may qualify as a 'family', definition of when a family is considered to be 'continuously assisted'; standards for denying admission or terminating assistance based on criminal activity or alcohol abuse in accordance with 982.553;
- Encouraging participation by owners of suitable units located outside areas of low income or minority concentration;
- Assisting a family that claims that illegal discrimination has prevented the family from leasing a suitable unit;
- Providing information about a family to prospective owners;
- Disapproval of owners;
- Subsidy standards;
- Family absence from the dwelling unit ;
- How to determine who remains in the program if a family breaks up;
- Informal review procedures for applicants;
- Informal hearing procedures for participants;
- The process for establishing and revising voucher payment standards;
- The method of determining that rent to owner is a reasonable rent (initially and during the term of a HAP contract);
- Special policies concerning special housing types in the program (e.g., use of shared housing);
- Policies concerning payment by a family to HACB of amounts the family owes HACB;
- Interim redeterminations of family income and composition;
- Restrictions, if any, on the number of moves by a participant family;
- Approval by the Board of Commissioners or other authorized officials to charge the administrative fee reserve; and
- Procedural guidelines and performance standards for conducting required housing quality standards inspections.

C. HUD & HACB Approach to Policy Development

HUD has developed an approach to monitoring and policy development that requires PHAs to establish policy for those purposes.

A primary focus of HUD's Rental Integrity Monitoring (RIM) program was consistency – consistency in how PHAs conduct their business and in how HUD monitors PHA activities. HUD expects that all staff will be consistent in the procedures they follow and the calculations they make and that their actions will be consistent with HACB's Administrative Plan.

HUD makes a distinction between:

- Mandatory policies: those driven by legislation, regulations, current handbooks, notices, and legal opinions, and
- Optional, non-binding guidance, including guidebooks, notices that have expired and recommendations from individual HUD staff.

HUD expects PHAs to develop policies and procedures that are consistent with mandatory policies and to make clear the optional policies HACB has adopted. HACB's Administrative Plan is the foundation of those policies and procedures. HUD's new directions require, more than ever, that PHAs make policy choices to provide guidance to staff and consistency to program applicants and participants.

Following HUD guidance, even though it is not mandatory, provides a PHA with a "safe harbor." HUD has already determined that the recommendations and suggestions it makes are consistent with mandatory policies. If a PHA adopts an alternative strategy, it must make its own determination that the alternative approach is consistent with legislation, regulations, and other mandatory requirements. There may be very good reasons for adopting a policy or procedure that is different than HUD's safe harbor, but PHAs should carefully think through those decisions.

D. Organization of the Plan

The Plan is organized to provide information to users in particular areas of operation.

E. Updating and Revising the Plan

The original Administrative Plan and any changes will be approved by the Board of Commissioners of the agency, the pertinent sections included in the Agency Plan, and a copy provided to HUD.

HACB will review and update the plan when needed to reflect changes in regulations, HACB operations and to ensure staff consistency in operation.

II. Fair Housing and Equal Opportunity

INTRODUCTION

This chapter explains the laws and HUD regulations requiring PHA's to affirmatively further civil rights and fair housing in all federally-assisted housing programs. The letter and spirit of these laws are implemented through consistent policy and processes. The responsibility to further nondiscrimination pertains to all areas of HACB's housing choice voucher (HCV) operations.

This chapter describes HUD regulations and HACB policies related to these topics in three parts:

Part A: Nondiscrimination. This part presents the body of laws and regulations governing the responsibilities of HACB regarding nondiscrimination.

Part B: Policies Related to Persons with Disabilities. This part discusses the rules and policies of the housing choice voucher program related to reasonable accommodation for persons with disabilities. These rules and policies are based on the Fair Housing Act (42.U.S.C.) and Section 504 of the Rehabilitation Act of 1973, and incorporate guidance from the Joint Statement of The Department of Housing and Urban Development and the Department of Justice (DOJ), issued May 17, 2004.

Part C: Prohibition of Discrimination Against Limited English Proficiency Persons. This part details the obligations of HACB to ensure meaningful access to the HCV program and its activities by persons with limited English proficiency (LEP). This part incorporates HUD and DOJ's Notice of Guidance, published December 19, 2003 in the *Federal Register*.

A. Nondiscrimination

1. Overview

Federal laws require HACB to treat all applicants and participants equally, providing the same quality of service, regardless of family characteristics and background. Federal law prohibits discrimination in housing on the basis of race, color, religion, sex, national origin, age, familial status, and disability. HACB will comply fully with all federal, state, and local nondiscrimination laws, and with rules and regulations governing fair housing and equal opportunity in housing and employment, including:

- Title VI of the Civil Rights Act of 1964
- Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988)
- Executive Order 10063
- Section 504 of the Rehabilitation Act of 1973
- The Age Discrimination Act of 1975
- Title II of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern)
- “Violence Against Women and Department of Justice Reauthorization Act of 2005”.

- When more than one civil rights law applies to a situation, the laws will be read and applied together.
- Any applicable state laws or local ordinances and any legislation protecting individual rights of tenants, applicants, or staff that may subsequently be enacted

2. Nondiscrimination

Federal regulations prohibit discrimination against certain protected classes. State and local requirements, as well as HACB policies, can prohibit discrimination against additional classes of people.

HACB shall not discriminate because of race, color, sex, religion, familial status, age, disability or national origin (called “protected classes”)

Familial status includes children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18.

**HACB will not discriminate on the basis of marital status or sexual orientation.
HACB will not use any of these factors to:**

- Deny to any family the opportunity to apply for housing, nor deny to any qualified applicant the opportunity to participate in the housing choice voucher program
- Provide housing that is different from that provided to others
- Subject anyone to segregation or disparate treatment
- Restrict anyone's access to any benefit enjoyed by others in connection with the housing program
- Treat a person differently in determining eligibility or other requirements for admission
- Steer an applicant or participant toward or away from a particular area based any of these factors
- Deny anyone access to the same level of services
- Deny anyone the opportunity to participate in a planning or advisory group that is an integral part of the housing program
- Discriminate in the provision of residential real estate transactions
- Discriminate against someone because they are related to or associated with a member of a protected class
- Publish or cause to be published an advertisement or notice indicating the availability of housing that prefers or excludes persons who are members of a protected class.

Providing Information to Families and Owners

HACB will take steps to ensure that families and owners are fully aware of all applicable civil rights laws. As part of the briefing process, HACB will provide information to HCV applicant families about civil rights requirements and the opportunity to rent in a broad range of neighborhoods [24 CFR 982.301]. The Housing Assistance Payments (HAP) contract informs owners of the requirement not to discriminate against any person because of race, color, religion, sex, national origin, age, familial status, or disability in connection with the contract.

Discrimination Complaints

HACB will advise families how to file a complaint if they have been discriminated against by HACB or an owner. HACB will advise the family to make a Fair Housing complaint. HACB may also report the owner to HUD (Fair Housing/Equal Opportunity) or the local Fair Housing Organization. [24 CFR 982.304]

B. Policies Related to Persons with Disabilities

1. Overview

One type of disability discrimination prohibited by the Fair Housing Act is the refusal to make reasonable accommodation in rules, policies, practices, or services when such accommodation may be necessary to afford a person with a disability the equal opportunity to use and enjoy a program or dwelling under the program.

HACB will ask all applicants and participants if they require any type of accommodations, in writing, on the intake application, reexamination documents, and notices of adverse action by HACB.

2. Definition of Reasonable Accommodation

A person with a disability may require special accommodations in order to have equal access to the HCV program. The types of reasonable accommodations HACB can provide include changes, exceptions, or adjustments to a rule, policy, practice, or service.

Federal regulations stipulate that requests for accommodations will be considered reasonable if they do not create an "undue financial and administrative burden" for HACB, or result in a "fundamental alteration" in the nature of the program or service offered. A fundamental alteration is a modification that alters the essential nature of a provider's operations.

Types of Reasonable Accommodations

When needed, HACB will modify normal procedures to accommodate the needs of a person with disabilities. Examples include:

- Permitting applications and reexaminations to be completed by mail
- Conducting home visits
- Using higher payment standards (either within the acceptable range or with HUD approval of a payment standard outside HACB range) if HACB determines this is necessary to enable a person with disabilities to obtain a suitable housing unit
- Providing time extensions for locating a unit when necessary because of lack of availability of accessible units or special challenges of the family in seeking a unit
- Permitting an authorized designee or advocate to participate in the application or certification process and any other meetings with HACB staff
- Displaying posters and other housing information in locations throughout HACB's office in such a manner as to be easily readable from a wheelchair

3. Request for an Accommodation

If an applicant or participant indicates that an exception, change, or adjustment to a rule, policy, practice, or service is needed because of a disability, HUD requires that HACB treat the information as a request for a reasonable accommodation, even if no formal request is made [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].

The family must explain what type of accommodation is needed to provide the person with the disability full access to HACB's programs and services.

If the need for the accommodation is not readily apparent or known to HACB, the family must explain the relationship between the requested accommodation and the disability. There must be an identifiable relationship, or nexus, between the requested accommodation and the individual's disability.

HACB will encourage the family to make its request in writing using a reasonable accommodation request form. However, HACB will consider the accommodation any time the family indicates that an accommodation is needed whether or not a formal written request is submitted. The accommodation request must be verified.

4. Verification of Disability

The definition of a person with a disability for the purpose of obtaining a reasonable accommodation is much broader than the HUD definition of disability that is used for waiting list preferences and income allowances.

Before providing an accommodation, HACB will determine that the person meets the definition of a person with a disability, and that the accommodation will enhance the family's access to HACB's programs and services.

If a person's disability is obvious or otherwise known to HACB, and if the need for the requested accommodation is also readily apparent or known, no further verification will be required [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].

If a family indicates that an accommodation is required for a disability that is not obvious or otherwise known to HACB, HACB will verify that the person meets the definition of a person with a disability, and that the limitations imposed by the disability require the requested accommodation.

When verifying a disability, HACB will follow the verification policies. All information related to a person's disability will be treated in accordance with the confidentiality policies. In addition to the general requirements that govern all verification efforts, the following requirements apply when verifying a disability:

Third-party verification must be obtained from an individual identified by the family who is competent to make the determination. A doctor or other medical professional, a peer support group, a non-medical service agency, or a reliable third party who is in a position to know about the individual's disability may provide verification of a disability [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act]

- HACB will request only information that is necessary to evaluate the disability-related need for the accommodation. HACB will not inquire about the nature or extent of any disability.
- Medical records will not be accepted or retained in the participant file.

5. Approval/Denial of a Requested Accommodation [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].

HACB must approve a request for an accommodation if the following three conditions are met:

- The request was made by or on behalf of a person with a disability.
- There is a disability-related need for the accommodation.
- The requested accommodation is reasonable, meaning it would not impose an undue financial and administrative burden on HACB, or fundamentally alter the nature of HACB's HCV operations (including the obligation to comply with HUD requirements and regulations).

Requests for accommodations must be assessed on a case-by-case basis, taking into account factors such as the cost of the requested accommodation, the financial resources of HACB at the time of the request, the benefits that the accommodation would provide to the family, and the availability of alternative accommodations that would effectively meet the family's disability-related needs.

Before making a determination whether to approve the request, HACB may enter into discussion and negotiation with the family, request more information from the family, or may require the family to sign a consent form so that HACB may verify the need for the requested accommodation.

A person can expect a response within thirty (30) days after the submission of their reasonable accommodation request. However, there may be circumstances that may cause a delay in processing.

If HACB denies a request for an accommodation because it is not reasonable (it would impose an undue financial and administrative burden or fundamentally alter the nature of HACB's operations), HACB will discuss with the family whether an alternative accommodation could effectively address the family's disability-related needs without a fundamental alteration to the HCV program and without imposing an undue financial and administrative burden.

If HACB believes that the family has failed to identify a reasonable alternative accommodation after interactive discussion and negotiation, HACB will notify the family, in writing, of its determination within 10 business days from the date of the most recent discussion or communication with the family.

6. Program Accessibility for Persons with Hearing or Vision Impairments

At the initial point of contact with each applicant, HACB shall inform all applicants of alternative forms of communication that can be used other than plain language paperwork.

To meet the needs of persons with hearing impairments, TDD/TTY (text telephone display / teletype) communication will be available.

7. Physical Accessibility

HACB must comply with a variety of regulations pertaining to physical accessibility, including the following:

- PIH Notices for Accessibility
- Section 504 of the Rehabilitation Act of 1973
- The Americans with Disabilities Act of 1990
- The Architectural Barriers Act of 1968
- The Fair Housing Act of 1988

HACB's policies concerning physical accessibility must be readily available to applicants and participants. They can be found in three key documents:

- This plan describes the key policies that govern HACB's responsibilities with regard to physical accessibility.
- (HA) Accessibility Notice (which must be posted in the HCV offices in a conspicuous place) summarizes information about pertinent laws and implementing regulations related to non-discrimination and accessibility in federally-funded housing programs.
- HACB Plan provides information about self-evaluation, needs assessment, and transition plans.

The design, construction, or alteration of HACB facilities must conform to the Uniform Federal Accessibility Standards (UFAS). Newly-constructed facilities must be designed to be readily accessible to and usable by persons with disabilities. Alterations to existing facilities must be accessible to the maximum extent feasible, defined as not imposing an undue financial and administrative burden on the operations of the HCV program.

When issuing a voucher to a family that includes an individual with disabilities, HACB will include a current list of available accessible units known to HACB and will assist the family in locating an available accessible unit, if necessary.

In general, owners must permit the family to make reasonable modifications to the unit. However, the owner is not required to pay for the modification and may require that the unit be restored to its original state at the family's expense when the family moves.

8. Denial or Termination of Assistance

HACB's decision to deny or terminate the assistance of a family that includes a person with disabilities is subject to consideration of reasonable accommodation [24 CFR 982.552 (2)(iv)].

When applicants with disabilities are denied assistance, the notice of denial will inform them of HACB's informal review process and their right to request a hearing. In addition, the notice will inform applicants with disabilities of their right to request reasonable accommodations to participate in the informal hearing process.

When a participant family's assistance is terminated, the notice of termination will must inform them of HACB's informal hearing process and their right to request a hearing and reasonable accommodation.

When reviewing reasonable accommodation requests, HACB will consider whether any mitigating circumstances can be verified to explain and overcome the problem that led to HACB's decision to deny or terminate assistance. If a reasonable accommodation will allow the family to meet the requirements, HACB must make the accommodation.

C. Improving Access to Services for Persons with Limited English Proficiency (LEP)

It is HACB's policy to take all reasonable measures to ensure that its programs are accessible to eligible persons with limited English proficiency (LEP). HACB will conduct its programs in compliance with all Civil Rights laws and regulations, including HUD requirements for effective communication with LEP persons (68 Federal Register 70967, December 19, 2003). In accord with these requirements, HACB will undertake reasonable steps to ensure effective communication necessary for meaningful program access by LEP persons.

1. Affirmative Measures for Spanish-Speaking LEP Persons

As a result of HACB's analysis of (1) the number and proportion of LEP persons serviced or encountered in HACB's eligible service population, and (2) the frequency with which LEP individuals come into contact with HACB's programs, HACB has determined that HACB has particular obligations to ensure effective communication with Spanish-speaking persons.

Accordingly, it is HACB's policy that HACB will provide bilingual Spanish-speaking staff as necessary to provide oral language/interpreter services for Spanish-speaking LEP applicants, participants, or other members of the public interested in HACB's services. HACB will provide the following vital documents in both English and Spanish:

- Pre-applications and full applications
- Recertification materials
- Notice of Intent to Terminate
- Consent Forms

It is HACB's general policy and firm belief that we can operate our public housing program most effectively by ensuring effective communication with applicants and participants. Accordingly, HACB has prepared Spanish translations of many resident policies, and HACB will continue to expand its Spanish translation of policies and procedures.

2. HACB Assistance for LEP Persons Who Speak Another Language

It is HACB's aim to ensure that our programs are accessible to all persons, regardless of national origin or other protected class, including persons with limited English proficiency. HACB will provide reasonable language services necessary to ensure effective access by LEP persons. In determining the language services to be provided, including oral language/interpreter services, as well as written language/translation services, HACB will evaluate on a case-by-case basis that balances the following four factors:

- The number or proportion of LEP persons eligible to be served or likely to be encountered by the program;
- The frequency with which LEP persons come into contact with the program;
- The nature and importance to people's lives of the program, activity, or service provided; and
- The costs and resources available.

D. VIOLENCE AGAINST WOMEN ACT (VAWA) PROVISIONS

1. Purpose and Applicability

This Section of the Administrative Plan sets forth the applicable HACB policy provisions implementing the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162) as they apply to participants in the Housing Choice Voucher (HCV) or Section 8 Program and to landlords, owners and property managers in that program. and set forth HACB's policies and procedures regarding domestic violence, dating violence, and stalking, as hereinafter defined.

This Policy shall be applicable to the administration by HACB of all federally subsidized Section 8 rental assistance under the United States Housing Act of 1937 (42 U.S.C. §1437 *et seq.*). Notwithstanding its title, this policy is gender-neutral, and its protections are available to males who are victims of domestic violence, dating violence, or stalking as well as female victims of such violence.

The Purposes of these provisions are as follows:

- To maintain compliance with all applicable legal requirements imposed by VAWA;
- To ensure the physical safety of victims of actual or threatened domestic violence, dating violence, or stalking who are assisted by HACB;
- To provide and maintain housing opportunities for victims of domestic violence dating violence, or stalking;

- To Create and maintain collaborative arrangements between HACB, law enforcement authorities, victim service providers, and others to promote the safety and well-being of victims of actual and threatened domestic violence, dating violence and stalking, who are assisted by HACB; and
- To take appropriate action in response to an incident or incidents of domestic violence, dating violence, or stalking, affecting individuals assisted by HACB.

2. Definitions

- A. *Domestic Violence* – The term ‘domestic violence’ includes felony or misdemeanor crimes of violence (including verbal, emotional, psychological, physical and sexual acts of abuse) committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabiting with or has cohabited with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction.”
- B. *Dating Violence* – means violence committed by a person—
1. who is or has been in a social relationship of a romantic or intimate nature with the victim; and
 2. where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - (i) The length of the relationship.
 - (ii) The type of relationship.
 - (iii) The frequency of interaction between the persons involved in the relationship.
- C. *Stalking – means –*
- (A) to follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate another person; and (ii) to place under surveillance with the intent to kill, injure, harass or intimidate another person; and
 - (B) in the course of, or as a result of, such following, pursuit, surveillance or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to –
 - (i) that person;
 - (ii) a member of the immediate family of that person; or
 - (iii) the spouse or intimate partner of that person;
- D. *Immediate Family Member* - means, with respect to a person –
- (A) A spouse, parent, brother, sister, or child of that person, or an individual to whom that person stands in loco parentis; or
 - (B) Any other person living in the household of that person and related to that person by blood or marriage.

- E. *Perpetrator* – means person who commits an act of domestic violence, dating violence or stalking against a victim.

3. Admissions and Screening

- A. *Non-Denial of Assistance*. HACB will not deny admission to the Section 8 rental assistance program to any person because that person is or has been a victim of domestic violence, dating violence, or stalking, provided that such person is otherwise qualified for such admission.
- B. *Mitigation of Disqualifying Information*. When so requested in writing by an applicant for assistance whose history includes incidents in which the applicant was a victim of domestic violence, HACB shall take such information into account in mitigation of potentially disqualifying information, such as poor credit history or previous damage to a dwelling. If requested by an applicant to take such mitigating information into account, HACB shall be entitled to conduct such inquiries as are reasonably necessary to verify the claimed history of domestic violence and its probable relevance to the potentially disqualifying information. HACB will not disregard or mitigate potentially disqualifying information if the applicant household includes a perpetrator of a previous incident or incidents of domestic violence.

4. Termination of Tenancy or Assistance

- A. *VAWA Protections*. Under VAWA persons assisted under the Section 8 rental assistance program have the following specific protections, which will be observed by HACB:
1. An incident or incidents of actual or threatened domestic violence, dating violence, or stalking will not be considered to be a “serious or repeated” violation of the lease by the victim or threatened victim of that violence and will not be good cause for terminating the tenancy or occupancy rights of or assistance to the victim of that violence.
 2. In addition to the foregoing, tenancy or assistance will not be terminated by HACB as a result of criminal activity, if that criminal activity is directly related to domestic violence, dating violence or stalking engaged in by a member of the assisted household, a guest or another person under the tenant’s control, and the tenant or an immediate family member is the victim or threatened victim of this criminal activity. However, the protection against termination of tenancy or assistance described in this paragraph is subject to the following limitations:
 - (a) Nothing contained in this paragraph shall limit any otherwise available authority of HACB or a Section 8 owner or manager to terminate tenancy, evict, or to terminate assistance, as the case may be, for any violation of a lease or program requirement not premised on the act or acts of domestic violence, dating violence, or stalking in question against the tenant or a member of the tenant’s household. However, in taking any such action, neither HACB nor a Section 8 manager or owner may apply a more demanding standard to the victim of domestic violence dating violence or stalking than that applied to other tenants.

(b) Nothing contained in this paragraph shall be construed to limit the authority of HACB or a Section 8 owner or manager to evict or terminate from assistance any tenant or lawful applicant if the owner, manager or HACB, as the case may be, can demonstrate an actual and imminent threat to other tenants or to those employed at or providing service to the property, if the tenant is not evicted or terminated from assistance.

B. *Removal of Perpetrator.* Further, notwithstanding anything in paragraph VI.A.2. or Federal, State or local law to the contrary, HACB or a Section 8 owner or manager, as the case may be, may bifurcate a lease, or remove a household member from a lease, without regard to whether a household member is a signatory to a lease, in order to evict, remove, terminate occupancy rights, or terminate assistance to any individual who is a tenant or lawful occupant and who engages in acts of physical violence against family members or others. Such action against the perpetrator of such physical violence may be taken without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is also the tenant or a lawful occupant. Such eviction, removal, termination of occupancy rights, or termination of assistance shall be effected in accordance with the procedures prescribed by law applicable to terminations of tenancy and evictions by HACB. Leases used for all operated by HACB and, at the option of Section 8 owners or managers, leases for dwelling units occupied by families assisted with Section 8 rental assistance administered by HACB, shall contain provisions setting forth the substance of this paragraph.

5. Verification of Domestic Violence, Dating Violence and Stalking.

A. *Requirement for Verification.* The law allows, but does not require, HACB or a Section 8 owner or manager to verify that an incident or incidents of actual or threatened domestic violence, dating violence, or stalking claimed by a tenant or other lawful occupant is bona fide and meets the requirements of the applicable definitions set forth in this policy. Subject only to a waiver as provided in paragraph VII. C., HACB shall require verification in all cases where an individual claims protection against an action involving such individual proposed to be taken by HACB. Section 8 owners or managers receiving rental assistance administered by HACB may elect to require verification, or not to require it as permitted under applicable law.

Verification of a claimed incident or incidents of actual or threatened domestic violence, dating violence or stalking may be accomplished in one of the following three ways:

1. *HUD-approved form* - by providing to HACB or to the requesting Section 8 owner or manager a written certification, on a form approved by the U.S. Department of Housing and Urban Development (HUD), that the individual is a victim of domestic violence, dating violence or stalking that the incident or incidents in question are bona fide incidents of actual or threatened abuse meeting the requirements of the applicable definition(s) set forth in this policy. The incident or incidents in question must be described in reasonable detail as required in the HUD-approved form, and the completed certification must include the name of the perpetrator.

2. *Other documentation* - by providing to HACB or to the requesting Section 8 owner or manager documentation signed by an employee, agent, or volunteer of a victim service provider, an attorney, or a medical professional, from whom the victim has sought assistance in addressing the domestic violence, dating violence or stalking, or the effects of the abuse, described in such documentation. The professional providing the documentation must sign and attest under penalty of perjury (28 U.S.C. 1746) to the professional's belief that the incident or incidents in question are bona fide incidents of abuse meeting the requirements of the applicable definition(s) set forth in this policy. The victim of the incident or incidents of domestic violence, dating violence or stalking described in the documentation must also sign and attest to the documentation under penalty of perjury.
 3. *Police or court record* – by providing to HACB or to the requesting Section 8 owner or Federal, State or local police or court record describing the incident or incidents in question.
- B. *Time allowed providing verification/ failure to provide.* An individual who claims protection against adverse action based on an incident or incidents of actual or threatened domestic violence, dating violence or stalking, and who is requested by HACB, or a Section 8 owner or manager to provide verification, must provide such verification within 10 business days after receipt of the request for verification. Failure to provide verification, in proper form within such time will result in loss of protection under VAWA and this policy against a proposed adverse action.
- C. *Waiver of verification requirement.* The Executive Director of HACB, or a Section 8 owner or manager, may, with respect to any specific case, waive the above-stated requirements for verification and provide the benefits of this policy based on the victim's statement or other corroborating evidence. Such waiver may be granted in the sole discretion of the Executive Director, owner or manager. Any such waiver must be in writing. Waiver in a particular instance or instances shall not operate as precedent for, or create any right to, waiver in any other case or cases, regardless of similarity in circumstances.

6. Confidentiality

- A. *Right of confidentiality.* All information (including the fact that an individual is a victim of domestic violence, dating violence or stalking) provided to HACB or to a Section 8 owner or manager in connection with a verification required in this policy or provided in lieu of such verification where a waiver of verification is granted, shall be retained by the receiving party in confidence and shall neither be entered in any shared database nor provided to any related entity, except where disclosure is:
1. Requested or consented to by the individual in writing, or
 2. Required for use in a eviction proceeding or in connection with termination of Section 8 assistance, as permitted in VAWA, or
 3. Otherwise required by applicable law.

- B. *Notification of rights.* All tenants of tenants participating in the Section 8 rental assistance program administered by HACB shall be notified in writing concerning their right to confidentiality and the limits on such rights to confidentiality.

7. Transfer to New Residence

- A. *Application for transfer.* In situations that involve significant risk of violent harm to an individual as a result of previous incidents or threats of domestic violence, dating violence, or stalking, HACB will, approve transfer by a Section 8 tenant to a different unit in order to reduce the level of risk to the individual. A tenant who requests transfer must attest in such application that the requested transfer is necessary to protect the health or safety of the tenant or another member of the household who is or was the victim of domestic violence dating violence or stalking and who reasonably believes that the tenant or other household member will be imminently threatened by harm from further violence if the individual remains in the present dwelling unit.
- B. *Action on applications.* HACB will act upon such an application within ten (10) business days.
- C. *Portability.* Notwithstanding the foregoing, a Section 8-assisted tenant will not be denied portability to a unit located in another jurisdiction (notwithstanding the term of the tenant's existing lease has not expired, or the family has not occupied the unit for 12 months) so long as the tenant has complied with all other requirements of the Section 8 program and has moved from the unit in order to protect a health or safety of an individual member of the household who is or has been the victim of domestic violence dating violence or stalking and who reasonably believes that the tenant or other household member will be imminently threatened by harm from further violence if the individual remains in the present dwelling unit.

8. Court Orders/Family Break-up

- A. *Court orders.* It is HACB's policy to honor orders entered by courts of competent jurisdiction affecting individuals assisted by HACB and their property. This includes cooperating with law enforcement authorities to enforce civil protection orders issued for the protection of victims and addressing the distribution of personal property among household members in cases where a family breaks up.

9. Notification

HACB shall provide written notification to applicants, tenants, and Section 8 owners and managers, concerning the rights and obligations created under VAWA relating to confidentiality, denial of assistance and, termination of tenancy or assistance.

10. Relationship with Other Applicable Laws

Neither VAWA nor this Policy implementing it shall preempt or supersede any provision of Federal, State or local law that provides greater protection than that provided under VAWA for victims of domestic violence, dating violence or stalking.

III. Applications, Waiting List and Tenant Selection

INTRODUCTION

When a family wishes to receive Section 8 HCV assistance, the family must submit an application that provides HACB with the information needed to determine the family's eligibility. HUD requires HACB to place all families that apply for assistance on a waiting list. When HCV assistance becomes available, HACB must select families from the waiting list in accordance with HUD requirements and PHA policies as stated in the administrative plan and the annual plan.

HACB is required to adopt a clear approach to accepting applications, placing families on the waiting list, selecting families from the waiting list and must follow this approach consistently. The actual order in which families are selected from the waiting list can be affected if a family has certain characteristics designated by HUD or HACB to receive preferential treatment. Funding earmarked exclusively for families with particular characteristics may also alter the order in which families are served.

HUD regulations require that all families have an equal opportunity to apply for and receive housing assistance, and that HACB affirmatively further fair housing goals in the administration of the program [24 CFR 982.53, HCV GB p. 4-1]. Adherence to the selection policies described in this chapter ensures that HACB will be in compliance with all relevant fair housing requirements.

This chapter describes HUD and PHA policies for taking applications, managing the waiting list and selecting families for HCV assistance. The policies outlined in this chapter are organized into three sections, as follows:

- A: The Application Process. This part provides an overview of the application process, and discusses how applicants can obtain and submit applications. It also specifies how HACB will handle the applications it receives.
- B: Managing the Waiting List. This part presents the policies that govern how HACB's waiting list is structured, when it is opened and closed, and how the public is notified of the opportunity to apply for assistance. It also discusses the process HACB will use to keep the waiting list current.
- C: Selection for HCV Assistance. This part describes the policies that guide HACB in selecting families for HCV assistance as such assistance becomes available. It also specifies how in-person interviews will be used to ensure that HACB has the information needed to make a final eligibility determination.

A. The Application Process

1. OVERVIEW

This part describes the policies that guide HACB's efforts to distribute and accept applications, and to make preliminary determinations of applicant family eligibility that affect placement of the family on the waiting list. This part also describes HACB's obligation to ensure the accessibility of the application process to elderly persons, people with disabilities, and people with limited English proficiency (LEP).

2. APPLYING FOR ASSISTANCE [HCV GB, pp. 4-11 – 4-16]

Any family that wishes to receive HCV assistance must apply for admission to the program. Families must comply with the procedures outlined in HACB's current application process, including but not limited to Application by Lottery. Applications will be made available in an accessible format upon request from a person with a disability.

HACB normally selects families for its HCV waiting list by lottery but may choose other selection methods for families who are requesting to be placed on the HCV Project Base waiting list.

Application by Lottery

When HACB determines that there are not enough applicants to fill anticipated openings in the HCV program, HACB will re-open the waiting list. Applicants will be placed on the waiting list by utilizing a random selection lottery process.

HACB will publicly announce the accepting of lottery applications. During this time, any family asking to be placed on the waiting list for the HCV program will be given the opportunity to complete a lottery application.

Applicants will be informed in advance that only one lottery ticket will be allowed per family and duplicate applications will be discarded.

Applicants will also be given the procedure for submitting the lottery applications as well as the deadline for returning them.

Applicants will be informed that lottery applications received postmarked after the deadline date will not be included in the lottery.

Staff will enter the information from the application into HACB's computer database which will be used to randomly select the applicants,

The "drawing" will take place no later than 30 days from the closing of the lottery. HACB will select the number of lottery applications that were specified in the advertisement from the "drawing". The "drawing" will be monitored by an individual, organization or agency designated by HACB.

The numbers drawn will be posted at HACB's office.

Applicants whose names were drawn will be notified by regular mail inform them of their placement in the lottery. They will be organized on the waiting list by date and time the lottery was drawn.

Applicants whose names were not drawn will be notified by regular mail.

Application Process

The application process will involve two phases.

The first phase is the initial application for assistance (referred to as the pre-application). This first phase results in the family's placement on the waiting list. The lottery application will serve as the pre-application.

The date and time of the drawing of the lottery application will be the date of application.

The second phase is the final determination of eligibility (referred to as the full application). The full application takes place when the family reaches the top of the waiting list. At this time HACB ensures that verification of all HUD and HACB eligibility factors are used to determine the family's eligibility for the issuance of a voucher.

3. ACCESSIBILITY OF THE APPLICATION PROCESS

Elderly and Disabled Populations [24 CFR 8 and HCV GB, pp. 4-11 – 4-13]

HACB will take a variety of steps to ensure that the application process is accessible to those people who might have difficulty complying with the normal, standard PHA application process. This could include people with disabilities, certain elderly individuals, as well as persons with limited English proficiency (LEP). HACB will provide reasonable accommodation to the needs of individuals with disabilities. The application-taking facility and the application process will be fully accessible, or HACB will provide an alternate approach that provides full access to the application process. HACB's policies provide a full discussion relative to providing reasonable accommodations for people with disabilities.

Limited English Proficiency

HACB will take reasonable steps to ensure meaningful access to their programs and activities by persons with limited English proficiency [24 CFR 1]. The Administrative Plan provides a full discussion on HACB's policies related to ensuring access to people with limited English proficiency (LEP).

**4. PLACEMENT ON THE WAITING LIST [24 CFR 982.206(b)(2)]
[24 CFR 982.201(f)] [24 CFR 982.202(c)].**

HACB will review each complete application received and make a preliminary assessment of the family's eligibility.

No applicant has a right or entitlement to be listed on the waiting list, or to any particular position on the waiting list [24 CFR 982.202(c)].

Ineligible for Placement on the Waiting List

This section does not apply to those families whose names were not drawn in the lottery.

If HACB can determine from the information provided that a family is ineligible, the family will not be placed on the waiting list. Where a family is determined to be ineligible, HACB will send written notification of the ineligibility determination no more than 10 business days after the lottery. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal review and explain the process.

Eligible for Placement on the Waiting List

HACB will send written notification of the preliminary eligibility determination no more than 10 business days after the lottery.

Placement on the waiting list does not indicate that the family is, in fact, eligible for assistance. A final determination of eligibility will be made when the family is selected from the waiting list.

Applicants will be placed on the waiting list according to the order they were chosen by date and time their complete application is received by HACB. If the lottery method is chosen the lottery the order in which it is selected will be considered the date and time for the applicant.

B. Managing the Waiting List

1. OVERVIEW

HACB will have policies regarding various aspects of organizing and managing the waiting list of applicant families. This includes opening the list to new applicants, closing the list to new applicants, notifying the public of waiting list openings and closings, updating waiting list information, purging the list of families that are no longer interested in or eligible for assistance, as well as conducting outreach to ensure a sufficient number of applicants.

2. ORGANIZATION OF THE WAITING LIST [24 CFR 982.204 and 205]

HACB's HCV waiting list will be organized in such a manner to allow HACB to accurately identify and select families for assistance in the proper order, according to the admissions policies described in this plan.

The waiting list will contain the following information for each applicant listed:

- Applicant name;
- Family unit size;
- Date and time of application;
- Qualification for any local preference;
- Racial or ethnic designation of the head of household;
- Annual (gross) family income

HACB will maintain a single waiting list for the HCV program.

HUD directs that a family that applies for assistance from the HCV program must be offered the opportunity to be placed on the waiting list for any public housing, project-based voucher or moderate rehabilitation program HACB operates if 1) the other programs' waiting lists are open, and 2) the family is qualified for the other programs.

A family's decision to apply for, receive, or refuse other housing assistance must not affect the family's placement on the HCV waiting list, or any preferences for which the family may qualify.

HACB will not merge the HCV waiting list with the waiting list for any other program HACB operates.

3. OPENING AND CLOSING THE WAITING LIST [24 CFR 982.206]

Closing the Waiting List

HACB will utilize the following procedures for opening the waiting list:

When HACB opens the waiting list, HACB will advertise through public notice in newspapers, minority publications and media entities, location(s), and program(s) for which applications are being accepted:

The notice will contain:

- The dates, times, and the locations where families may apply.
- The programs for which applications will be taken.
- A brief description of the program.
- A statement that public housing residents must submit a separate application if they want to apply for section 8.
- Limitations, if any, on who may apply.

The notices will be made in an accessible format if requested. They will provide potential applicants with information that includes HACB address and telephone number, how to submit an application, information on eligibility requirements, and the availability of local preferences.

Upon request from a person with a disability, additional time will be given as an accommodation for submission of an application after the closing deadline. This accommodation is to allow persons with disabilities the opportunity to submit an application in cases when a social service organization provides inaccurate or untimely information about the closing date.

If the waiting list is open, HACB will accept applications from eligible families unless there is good cause for not accepting the application, such as denial of assistance because of action or inaction by members of the family for the grounds stated in the "Termination of Assistance and Tenancy" chapter of this Administrative Plan. [24 CFR 982.206(b)(2)]

HACB may limit the number of applications that may be selected for placement on the waiting list to cover a period of at least 24 months anticipated turnover and to avoid creating excessively long waiting periods. HACB reserves the right to add the option to rank applicants through lottery selection.

HACB is permitted to close the waiting list if it has an adequate pool of families to use its available HCV assistance. Alternatively, HACB may elect to continue to accept applications only from certain categories of families that meet particular preferences or funding criteria.

Re-opening the Waiting List

HACB will announce the reopening of the waiting list at least 1 calendar day prior to the date applications will first be accepted. If the list is only being reopened for certain categories of families, this information will be contained in the notice. HACB will give public notice by publishing the relevant information in suitable media outlets.

4. FAMILY OUTREACH [HCV GB, pp. 4-2 to 4-4]

HACB will conduct outreach as necessary to ensure that HACB has a sufficient number of applicants on the waiting list to use the HCV resources it has been allotted.

Because HUD requires HACB to serve a specified percentage of extremely low income families, HACB may need to conduct special outreach to ensure that an adequate number of such families apply for assistance [HCV GB, p. 4-20 to 4-21].

HACB outreach efforts must comply with fair housing requirements. This includes:

- Analyzing the housing market area and the populations currently being served to identify underserved populations
- Ensuring that outreach efforts are targeted to media outlets that reach eligible populations that are underrepresented in the program

- Avoiding outreach efforts that prefer or exclude people who are members of a protected class

HACB outreach efforts must be designed to inform qualified families about the availability of assistance under the program. These efforts may include, as needed, any of the following activities:

- Submitting press releases to local newspapers, including minority newspapers
- Developing informational materials and flyers to distribute to other agencies
- Providing application forms to other public and private agencies that serve the low income population
- Developing partnerships with other organizations that serve similar populations, including agencies that provide services for persons with disabilities

5. REPORTING CHANGES IN FAMILY CIRCUMSTANCES

While the family is on the waiting list, the family must immediately inform HACB of changes in contact information, including current residence, mailing address, and phone number. The changes must be submitted in writing.

6. UPDATING THE WAITING LIST [24 CFR 982.204]

Purging the Waiting List

The Waiting List will be purged approximately every 3 years by a mailing to all applicants to ensure that the waiting list is current and accurate. The mailing will ask for confirmation of continued interest.

Any mailings to the applicant, which require a response, will state that failure to respond within ten (10) business days will result in the applicant's name being dropped from the waiting list.

An extension of ten (10) business days to respond will be granted, if requested and needed as a reasonable accommodation for a person with a disability.

If the applicant did not respond to HACB request for information or updates because of a family member's disability, HACB will reinstate the applicant in the family's former position on the waiting list.

If the letter is returned with a forwarding address, it will be re-mailed to the address indicated.

If a letter is returned by the Post Office without a forwarding address, the applicant will be removed without further notice, and the envelope and letter will be maintained in the file.

If an applicant is removed from the waiting list for failure to respond, they will not be entitled to reinstatement unless a Program Selector determines there were circumstances beyond the person's control. The following exceptions, if determined to exist, will be acceptable to warrant reinstatement: medical reasons or out of town/country.

Removal from the Waiting List

If at any time an applicant family is on the waiting list, HACB determines that the family is not eligible for assistance, the family will be removed from the waiting list.

If a family is removed from the waiting list because HACB has determined the family is not eligible for assistance, a notice will be sent to the family's address of record. The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal review regarding HACB's decision [24 CFR 982.201(f)].

Removal from Project-Based Waiting List

If an applicant on the project-based waiting list has refused two offers of units receiving project-based assistance, the applicant will be removed from the project-based waiting list *with the exception of* applicants who have qualified for one or more preferences for project-based supportive housing programs and who have not received or refused an offer of a unit in one of the supportive housing programs for which they hold the preference. Removal from the project-based waiting list because of an applicant's refusal of offered assistance will not affect the applicant's placement on any other HACB waiting lists, as applicable, including the tenant-based Section 8 waiting list.

Rejected by Owner of Project-Based Unit

If an applicant is rejected for occupancy of a project-based Section 8 assisted unit by the owner of the property, the applicant will retain the same position on the project-based waiting list as if no offer had been made. Rejection by a property owner also will not affect an applicant's position on any other HACB waiting list, including the tenant-based Section 8 waiting list.

Maintenance of Waiting List Position if Rejected by Owner of Project-Based Unit

The decision to withdraw an applicant family that includes a person with disabilities from the waiting list is subject to reasonable accommodation. If the applicant did not respond to a PHA request for information or updates because of the family member's disability, HACB must reinstate the applicant family to their former position on the waiting list [24 CFR 982.204(c)(2)].

C. Selection for HCV Assistance

1. OVERVIEW

As vouchers become available, families on the waiting list must be selected for assistance in accordance with the policies described in this part.

The order in which families receive assistance from the waiting list depends on the selection method chosen by HACB and is impacted in part by any selection preferences that the family qualifies for. The source of HCV funding also may affect the order in which families are selected from the waiting list.

HACB must maintain a clear record of all information required to verify that the family is selected from the waiting list according to HACB's selection policies [24 CFR 982.204(b) and 982.207(e)].

2. SELECTION AND HCV FUNDING SOURCES

Special Admissions [24 CFR 982.203]

HUD may award HACB funding for specifically-named families living in specified types of units (e.g., a family that is displaced by demolition of HACB public housing; a non-purchasing family residing in a HOPE 1 or 2 projects). In these cases, HACB may admit families that are not on the waiting list, or without considering the family's position on the waiting list. HACB must maintain records showing that such families were admitted with special program funding.

Targeted Funding [24 CFR 982.204(e)]

HUD may award a PHA funding for a specified category of families on the waiting list. HACB must use this funding only to assist the families within the specified category. Within this category of families, the order in which such families are assisted is determined according to the policies provided.

Regular HCV Funding

Regular HCV funding may be used to assist any eligible family on the waiting list. Families are selected from the waiting list according to the policies provided.

3. SELECTION METHOD

HACB must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that HACB will use [24 CFR 982.202(d)].

Applicants shall be selected in the following order;

- First, by the targeted Income Tier I (0–30%), then within the targeted income tier, by the local preferences;

Applicants who are elderly, disabled, displaced families, families in a documented witness protection program, victims of domestic violence, or families with two or more persons will be given a selection priority over all “Other Single” applicants regardless of preference status [24 CFR 982.207].

- Priority One: Displaced Applicants or Victims of Domestic, Families in the in a documented Witness Protection Program, Situations involving crime and safety of current Low Income Public Housing Families, where transfer of a current Low Income Public Housing family to another public housing development does not meet the needs of HACB public housing residents due to domestic violence, witness protection, or other situations involving crime and safety.
- Priority Two: A current Low Income Public Housing family requiring an accessible unit as a reasonable accommodation where HACB is unable to accommodate the need through a Public Housing transfer, as well as a reasonable accommodation to support the non physical as well as the physical needs of the disabled.
- Priority Three: Elderly families, Disabled families and families with two or more persons

Special Admissions

Applicant Selection--Non –Waiting List

From time to time, HACB may issue or set aside Vouchers for families other than those on the waiting list. Those Vouchers may include Tenant Protection, Pequonnock Relocation Vouchers and Father Panik Village Project-Based Vouchers for Low Income Public Housing Applicants, Enhanced Vouchers, HUD Homeless Study, FUSE, Substance Abuse and Mental Health Service Administration (SAMHSA) and other Special Vouchers. HACB will issue those Vouchers based on applicable regulations and/or instructions from HUD, Court Settlement Agreements and with outside Local, State or Federal entities. Qualified applicants for such Special Admissions for any specific program or preference may be issued a voucher without waiting on a “wait list”. These applicants may be referred to HACB through referrals from perspective agencies.

If HACB is awarding Project-Based Vouchers and families are occupying the unit at the time the Vouchers are awarded, these families or individuals will be eligible for continued occupancy provided they meet all of the eligibility criteria for the HACB Program. These families will be referred to as “Tenants in Place”.

Project-Based Supportive Housing Assistance

HACB administers project-based Section 8 assistance for several supportive housing programs, each of which may provide different services. HACB provides a system of preferences for persons with disabilities in order to facilitate the matching of these supportive housing resources with persons who prefer to receive, and who qualify for, the supportive housing services to be provided with project-based Section 8-assisted units. When there is a vacancy in one of the HACB-assisted supportive housing programs, HACB's offer of project-based assistance for this unit will be awarded to the applicant highest on the project-based waiting list who has been granted a preference for that supportive housing program.

An applicant is eligible for a preference for a particular HACB-assisted project-based supportive housing program upon submission of a completed "Preference Form for HACB-Assisted Supportive Housing Programs" signed by both the applicant and the service provider who operates the program. An applicant may receive preferences for more than one HACB-assisted supportive housing program by submitting a completed Preference Form, signed by both the applicant and the appropriate service provider, for each supportive housing program with services that the applicant elects to receive and qualifies for.

These supportive housing preferences are program specific. An applicant preference tied to one specific supportive housing program is applicable only to units in that specific supportive housing program for which the applicant has received a preference, and does not have any affect on waiting list positions or admissions when project-based assistance become available in units in a different supportive housing program, nor in project-based units that are not part of a supportive housing program.

Availability of Preferences to All Section 8 Applicants

HACB will ensure that all LIPH (in accordance with the Father Panik Cosent Decree) and Section 8 applicants who wish to receive supportive housing assistance have the opportunity to access preferences.

HACB will inform all current applicants on HACB's LIPH/Section 8 wait list, through intake interviews or mailing, of opportunities for project-based assistance, including supportive housing, and the procedures for receiving preferences for one or more supportive housing programs. Current applicants on LIPH/Section 8 who wish to be considered for the Project-Based Section 8 waiting list will be placed on that list according to the date and time of their original application. Current applicants may receive a preference for one or more HACB-assisted supportive housing programs by submitting a Preference Form as provided above.

When HACB opens its Section 8 waiting lists, pre-applications will allow applicants to request positions on one or both waiting lists, and will inform applicants of how they may request a preference for one or more HACB-assisted supportive housing programs.

Whenever HACB develops a new supportive housing program that will receive project-based assistance, HACB will provide written notice to all current applicants on both LIPH and Section 8 waiting lists to inform applicants of this opportunity and the availability of preference for applicants with disabilities who would prefer to receive, and who qualify for, the program's services.

Income Targeting Requirement [24 CFR 982.201(b)(2)]

HUD requires that extremely low-income (ELI) families make up at least 75% of the families admitted to the HCV program during HACB's fiscal year. ELI families are those with annual incomes at or below 30% of the area median income. To ensure this requirement is met, HACB may skip non-ELI families on the waiting list in order to select an ELI family.

HACB will monitor progress in meeting the ELI requirement throughout the fiscal year. Extremely low-income families will be selected ahead of other eligible families on an as-needed basis to ensure the income targeting requirement is met.

Low income families admitted to the program that are "continuously assisted" under the 1937 Housing Act [24 CFR 982.4(b)], as well as low-income or moderate-income families admitted to the program that are displaced as a result of the prepayment of the mortgage or voluntary termination of an insurance contract on eligible low-income housing, are not counted for income targeting purposes [24 CFR 982.201(b)(2)(v)].

Order of Selection [24 CFR 982.207(c)] [24 CFR 982.204(d) and (e)]

Families will be selected from the waiting list based on the targeted funding or selection preference(s) for which they qualify, and in accordance with HACB's hierarchy of preferences, if applicable. Within each targeted funding or preference category, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by HACB or by their Lottery position number. Documentation will be maintained by HACB as to whether families on the list qualify for and are interested in targeted funding. If a higher placed family on the waiting list is not qualified or not interested in targeted funding, there will be a notation maintained so that HACB does not have to ask higher placed families each time targeted selections are made.

4. NOTIFICATION OF SELECTION

HACB will notify the family by first class mail when it is selected from the waiting list. The notice will inform the family of the following:

- Date, time, and location of the scheduled application interview, including any procedures for rescheduling the interview
- Who is required to attend the interview
- Other documents and information that should be brought to the interview

If a notification letter is returned to HACB with no forwarding address, the family will be removed from the waiting list.

5. THE APPLICATION INTERVIEW

Being invited to attend an interview does not constitute admission to the program.

Reasonable accommodation will be made for persons with disabilities who are unable to attend an interview due to their disability.

Families selected from the waiting list are required to participate in an eligibility interview.

All adult family members are required to attend the interview and sign the housing application. Exceptions may be made for students attending school out of state and/or for members for whom attendance would be a hardship.

If the head of household cannot attend the interview, the spouse may attend to complete the application and to certify for the family. The head of household, however, will be required to attend an interview within ten (10) business days of being notified of the determination of eligibility, to review the information and to certify by signature that all of the information is complete and accurate.

Reasonable accommodation will be made for persons with a disability who require an advocate or accessible offices. A designee will be allowed to participate in the interview process, but only with permission of the person with a disability.

The family must provide the information necessary to establish the family's eligibility and determine the appropriate level of assistance, as well as completing required forms, providing required signatures, and submitting required documentation.

If HACB determines at or after the interview that additional information or document(s) are needed, HACB will request the document(s) or information in writing. The family will be given ten (10) business days to supply the information. Failure to do so will be cause for denial of the application for failure to provide necessary certifications and release as required by the HACB.

Every adult household member must sign a consent form to release their criminal history records and to allow HACB's to receive records and use them in accordance with HUD regulations.

Any required documents or information that the family is unable to provide at the interview must be provided within 10 business days of the interview. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions) the family will be sent a notice of denial.

An advocate, interpreter, or other assistant may assist the family with the application and the interview process.

Interviews will be conducted in English. For limited English proficient (LEP) applicants, HACB may provide translation services in accordance with HACB's LEP plan.

If the family is unable to attend a scheduled interview, the family should contact HACB in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend a scheduled interview, HACB will send another notification letter with a new interview appointment time. Applicants who fail to attend two scheduled interviews without PHA approval will be denied assistance based on the family's failure to supply information needed to determine eligibility. A notice of denial will be issued in accordance with policies.

Exceptions will be made in cases where extenuating circumstances out of the applicant's control prevented them from attending the second appointment. The applicant will be required to provide acceptable documented proof. If approved, the applicant's appointment will be re-scheduled.

If an application is denied due to failure to attend the full application interview, the applicant will be notified in writing and offered an opportunity to request an informal review.

6. COMPLETING THE APPLICATION PROCESS

HACB will verify all information provided by the family. Based on verified information, HACB will make a final determination of eligibility and will confirm that the family qualified for any special admission, targeted admission, or selection preference that affected the order in which the family was selected from the waiting list.

If HACB determines that the family is ineligible, HACB will send written notification of the ineligibility determination within 10 business days of the determination. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal review.

If a family fails to qualify for any criteria that affected the order in which it was selected from the waiting list (e.g. targeted funding, extremely low-income), the family will be returned to its original position on the waiting list. HACB will notify the family in writing that it has been returned to the waiting list, and will specify the reasons for it.

If HACB determines that the family is eligible to receive assistance, HACB will invite the family to attend a briefing in accordance with the policies.

IV. Eligibility for Admission and Processing of Applications

A. Qualifying for Admission

1. It is HACB's policy to admit **only** applicants who are qualified¹ according to the following criteria:
 - a. Are a family², as defined in this plan;
 - b. Have an Annual Income (as defined in this plan) at the time of admission that does not exceed the income limits (maximum incomes by family size established by HUD) posted in HACB offices. 24 CFR §5.6
 - c. Provide original documentation of Social Security numbers for family members or certify that they do not have Social Security numbers 24 CFR § 5.216; 24 CFR § 5.218, 24 CFR § 5.233 and
 - d. Consent to HACB's collection and use of family information as provided for in HACB-provided consent forms.
 - e. At least one member of the family is either a citizen or eligible immigrant. 24 CFR Part 5. Subpart E.

B. Establishing and Maintaining the Waiting List

1. It is the policy of HACB to administer its waiting list as required by HUD's regulations and its Procedure on Application Intake and Processing.
2. Waiting lists will be opened and closed in accordance with the Procedure on Opening and Closing Waiting Lists.
3. Applicant names will be removed from the waiting list only in accordance with Procedure on Removing Applicants from the Waiting List.

C. Processing Applications for Admission

1. HACB will accept and process applications in accordance with applicable HUD Regulations and HACB's Procedure on Application Intake and Processing.
2. Every application file for admission shall include the
 - a. application number;
 - b. applicant's race and ethnicity;
 - c. eligibility determination;
 - d. when eligible, the unit size(s) for which eligible;
 - e. preference, if any; and
 - f. date of voucher issuance.
3. As applicants approach the top of the waiting list, they will be asked to come to HACB Office for an interview to complete their applicant file. Applicants who fail to attend their scheduled interview or who cannot be contacted to schedule an interview will be scheduled for a second interview. Applicants who cannot be contacted after a second attempt or who fail to show for a second interview shall have their applications withdrawn, subject to reasonable accommodations for people with disabilities.

¹ The term "qualified" refers to applicants who are eligible and able to meet the applicant selection standards. This term is taken from the 504 regs: **24 CFR § 8.3** definition of "Qualified Individual with Disability".

- a. The following information will be verified according to Procedure on Verification, to determine qualification for admission to housing:
 1. Family composition and type (Elderly/Disabled/non-elderly)
 2. Annual Income
 3. Assets and Asset Income
 4. Deductions from Income
 5. Preferences
 6. Social Security Numbers of all Family Members
 7. Applicant Screening Information
 8. Citizenship or eligible immigration status
 9. Birth Certificate
 10. Valid Photo Picture ID
- b. Third party written, faxed or electronic verification is the required form of documentation. Any other form of verification requires a note to the file explaining its use.

D. Screening for Eligibility

HACB will perform a criminal background check through National, local and/or state law enforcement for every adult household member.

If the results of the criminal background check indicate that there may be past criminal activity, but the results are inconclusive, HACB will request a fingerprint card and will request information from the appropriate law enforcement agency.

HACB is required to perform criminal background checks necessary to determine whether any household member is subject to a lifetime registration requirement under a state sex offender program in the state where the housing is located, as well as in any other state where a household member is known to have resided [24 CFR 982.553(a)(2)(i)].

If HACB proposes to deny assistance based on a criminal record or on lifetime sex offender registration information, HACB will notify the household of the proposed action and must provide the subject of the record and the applicant a copy of the record and an opportunity to dispute the accuracy and relevance of the information prior to a denial of admission. [24 CFR 5.903(f) and 5.905(d)].

1. HUD Mandatory Denial of Admission

HACB is **required** by HUD to reject the applications of certain applicants for criminal activity or drug abuse by family members 24 CFR § 960.204, 24 CFR § 966.4, 24 CFR § 982.553:

- a. HACB is required to reject any applicant for three years from the date of eviction if any household member has been evicted from any federally assisted housing for drug-related criminal activity. However, HACB may admit the household if HACB determines that 24 CFR § 982.553(a):

- i. The evicted household member engaged in the drug-related criminal activity of drug use and has successfully completed a supervised drug rehabilitation program approved by HACB, or
- ii. The circumstances leading to the eviction no longer exist (for example, the criminal household member has died or is imprisoned).
- iii. The applicant household will not include the member involved in drug-related criminal activity
- b. HACB is required to reject the application of a household if HACB determines that household member is currently engaging in illegal use of a drug; or HACB has reasonable cause to believe that a household member's illegal use or pattern of illegal use of a drug; or
- c. HACB is required to reject the application of a household if HACB determines that any household member has ever been convicted of manufacture or production of methamphetamine on the premises of any federally assisted housing; or
- d. HACB is required to reject the application of a household if HACB determines that any member of the household is subject to a lifetime registration requirement under a State sex offender registration program; or
- e. HACB is required to reject the application of a household if HACB determines that any member of the household's abuse or pattern of abuse of alcohol may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

2. **HACB Mandatory Denial of Admission**

- a. HACB will reject applicants if HACB determines that any household member has ever been convicted of arson or child molestation
- b. HACB will reject a household for admission if HACB determines that any member of the household has been arrested for or convicted of any of the following crimes during the 5 years prior to admission:
 - Criminal activity that shows a pattern or history of abuse of alcohol, illegal or prescription drugs and narcotics;
 - The illegal manufacture sale, distribution, use, or possession with the intent to manufacture, sell, distribute, or use a controlled substance or drug
 - Use, attempted use, or threatened use of physical violence
 - Injury to a minor;
 - Eviction from public housing for illegal drug activity;
 - Robbery;
 - Felony Larceny;
 - Prostitution;
 - Homicide;
 - Possession or sale of illegal firearms;
 - Any form of terrorism.

c. HACB will reject a household for admission if HACB determines that any member of the household has been convicted of the following crimes in the past 3 years:

- Misdemeanor larceny;
- Risk of injury to a minor
- Criminal mischief or disorderly conduct against a person or property;
- Financial crimes including but not limited to welfare fraud, forgery, and grand theft;

Other crimes, and crimes committed more than 5 years ago, will be considered on a case-by-case basis.

E. Screening for Suitability as a Tenant [24 CFR 982.307]

HACB has no liability or responsibility to the owner for the family's behavior or suitability for tenancy.

HACB will not conduct additional screening to determine an applicant family's suitability for tenancy.

The owner is responsible for screening and selection of the family to occupy the owner's unit. At or before HACB approval of the tenancy, HACB will inform the owner that screening and selection for tenancy is the responsibility of the owner. The owner is responsible for screening families based on their tenancy histories, including such factors as: [24 CFR 982.307(a)(3)]

- Payment of rent and utility bills
- Caring for a unit and premises
- Respecting the rights of other residents to the peaceful enjoyment of their housing
- Drug-related criminal activity or other criminal activity that is a threat to the health, safety or property of others; and
- Compliance with other essential conditions of tenancy.

HACB will give the owner:

The family's current and prior address as shown in HACB's records and, The name and address (if known by HACB) of the landlord at the family's current and prior address.

F. HACB's Policy Regarding Mixed-Finance Developments

From time to time, HACB may engage in mixed-finance development which includes Project-Based Section 8 units (the "PBV units"). Through this process, PBV units may be owned and managed by entities other than HACB. Notwithstanding any contrary provision within this Administrative Plan, HACB may delegate certain admissions and occupancy functions as discussed within the Administrative Plan to the owners and/or managers of those mixed-finance developments.

Provided, however, that such admissions and occupancy functions must be performed in accordance with this Administrative Plan and applicable public housing requirements (including any deviations from the Administrative Plan, as set forth in this section).

HACB acknowledges that such mixed-finance developments may be subject to Tax Credit Requirements and/or AHP Requirements. For purposes of this Administrative Plan, Tax Credit Requirements shall mean any and all matters required by Section 42 of the Internal Revenue Code of 1986 and regulations there under (Section 42), the Connecticut Housing Finance Agency (CHFA) or any agreement with a condition of receipt of tax credits, whether or not such requirement is explicitly stated in Section 42, or CHFA requirements. For purposes of this Policy, AHP Requirements shall mean any and all matters required by the Federal Housing Finance Board Affordable Housing Program regulations at 12 CFR 951. In order to facilitate compliance with Tax Credit Requirements and/or AHP Requirements, HACB will not impose any policy within this Administrative Plan upon any mixed-finance development if such policies would create non-compliance with Tax Credit Requirements and/or AHP Requirements and will not disapprove policies of Owner required for compliance with Tax Credit Requirements and AHP Requirements, unless such policies are otherwise required by PBV Requirements. Examples of policies that might be different than what is set forth in the Administrative Plan include the requirement for annual re-certifications (to the extent required by Tax Credit Requirements) and different income tiering requirements.

In the event of a conflict between any deal-specific documents and this Administrative Plan, those deal-specific documents shall control. Provided however,, that in all events notwithstanding anything in this addendum to the contrary, the PBV Requirements shall control.

As used in this addendum, the term “PBV Requirements” shall mean the following: the Housing Act of 1937, HUD regulations there under (and to the extent applicable, any HUD-approved waivers of regulatory requirements); and any other federal laws, regulations, notices and Executive Orders pertaining to Project-Based Section 8 Units, as those requirements may be waived or amended from time to time.

V. Briefings and Voucher Issuance

INTRODUCTION

This chapter explains the briefing and voucher issuance process. When a family is determined to be eligible for the Housing Choice Voucher (HCV) program, HACB must ensure that the family fully understands the way the program operates and the family's obligations under the program. This is accomplished through both an oral briefing and provision of a briefing packet containing written documentation of information the family needs to know. Once the family is fully informed of the program's requirements, HACB issues the family a voucher. The voucher includes the unit size the family qualifies for based on HACB's subsidy standards, as well as the dates of issuance and expiration of the voucher. The voucher is the document that permits the family to begin its search for a unit, and limits the amount of time the family has to successfully locate an acceptable unit.

This chapter describes HUD regulations and HACB policies related to these topics in two parts:

- A: Briefings and Family Obligations. This part details the program's requirements for briefing families orally, and for providing written materials describing the program and its requirements. It includes a particular focus on the family's obligations under the program.
- B: Subsidy Standards and Voucher Issuance. This part discusses HACB's standards for determining how many bedrooms a family of a given composition qualifies for, which in turn affects the amount of subsidy the family can receive. It also discusses the policies that dictate how vouchers are issued, and how long families have to locate a unit.

A. Briefings and Family Obligations

1. OVERVIEW

HUD regulations require HACB to conduct mandatory briefings for applicant families. The briefing provides a broad description of owner and family responsibilities, explains HACB's procedures, and includes instructions on how to lease a unit. This part describes how oral briefings will be conducted, specifies what written information will be provided to families, and lists the family's obligations under the program.

2. BRIEFING [24 CFR 982.301]

HACB will give the family an oral briefing and provide the family with a briefing packet containing written information about the program. Families may be briefed individually or in groups. At the briefing, HACB will ensure effective communication in accordance with Section 504 requirements (Section 504 of the Rehabilitation Act of 1973), and ensure that the briefing site is accessible to individuals with disabilities.

For a more thorough discussion of accessibility requirements:

- Briefings will be conducted in group meetings.
- The head of household is required to attend the briefing.
- Families that attend group briefings and still need individual assistance will be referred to an appropriate HACB staff person.
- Briefings will be conducted in English. For limited English proficient (LEP) applicants, HACB will provide translation services in accordance with HACB's LEP plan.

Notification and Attendance

If the applicant family wishes to add or remove a member(s) at the time of the initial briefing, the family will be referred back to the Intake Department for further screening.

Families will be notified of their eligibility for assistance at the time they are invited to attend a briefing. The notice will identify who is required to attend the briefing, as well as the date and time of the scheduled briefing.

If the notice is returned by the post office with no forwarding address, a notice of denial will be sent to the family's address of record, as well as to any alternate address provided on the initial application.

Applicants who provide prior notice of inability to attend a briefing will automatically be scheduled for another briefing. HACB will notify the family of the date and time of the second scheduled briefing. Applicants who fail to attend two scheduled briefings, prior notification and without HACB approval, will be denied assistance.

Oral Briefing [24 CFR 982.301(a)]

Each briefing will provide information on the following subjects:

- How the Housing Choice Voucher program works;
- Family and owner responsibilities;
- Where the family can lease a unit, including renting a unit inside or outside HACB's jurisdiction;
- For families eligible under portability, an explanation of portability. HACB cannot discourage eligible families from moving under portability;
- For families living in high-poverty census tracts, an explanation of the advantages of moving to areas outside of high-poverty concentrations; and
- For families receiving welfare-to-work vouchers, a description of any local obligations of a welfare-to-work family and an explanation that failure to meet the obligations is grounds for denial of admission or termination of assistance.

Briefing Packet [24 CFR 982.301(b)]

Documents and information provided in the briefing packet will include the following:

- The term of the voucher, and HACB's policies on any extensions or suspensions of the term. If HACB allows extensions, the packet must explain how the family can request an extension.
- A description of the method used to calculate the housing assistance payment for a family, including how HACB determines the payment standard for a family, how HACB determines total tenant payment for a family, and information on the payment standard and utility allowance schedule.
- An explanation of how HACB determines the maximum allowable rent for an assisted unit.
- Where the family may lease a unit. For a family that qualifies to lease a unit outside HACB jurisdiction under portability procedures, the information must include an explanation of how portability works.
- The HUD-required tenancy addendum, which must be included in the lease.
- The form the family must use to request approval of tenancy, and a description of the procedure for requesting approval for a tenancy.
- A statement of HACB policy on providing information about families to prospective owners.
- HACB subsidy standards including when and how exceptions are made.
- The HUD brochure on how to select a unit.
- The HUD pamphlet on lead-based paint entitled *Protect Your Family from Lead in Your Home*.
- Information on federal, state and local equal opportunity laws and a copy of the housing discrimination complaint form.
- A list of landlords or other parties willing to lease to assisted families or help families find units, especially outside areas of poverty or minority concentration.
- Notice that if the family includes a person with disabilities, the family may request a list of available accessible units known to HACB.
- A summary of HACB's reasonable accommodations procedures.
- Request for Accommodation of Disability form.
- The family obligations under the program, including any obligations of a welfare-to-work family.
- The grounds on which HACB may terminate assistance for a participant family because of family action or failure to act.
- HACB informal hearing procedures including when HACB is required to offer a participant family the opportunity for an informal hearing, and how to request the hearing.

The following additional information will be included in the briefing packet in order to receive full points under SEMAP Indicator 7, Expanding Housing Opportunities [24 CFR 985.3(g)].

- Maps showing areas with housing opportunities outside areas of poverty or minority concentration, both within its jurisdiction and its neighboring jurisdiction.
- Information about the characteristics of these areas including job opportunities, schools, transportation and other services.
- An explanation of how portability works, including a list of portability contact persons for neighboring PHAs including names, addresses, and telephone numbers.

Additional Items to be Included in the Briefing Packet

HACB will provide the following additional materials in the briefing packet:

- A copy of HUD form 903
- The publication *Things You Should Know (HUD-1140-OIG)* that explains the types of actions a family must avoid and the penalties for program abuse.

3. FAMILY OBLIGATIONS

Obligations of the family are described in the housing choice voucher (HCV) regulations and on the voucher itself. These obligations include responsibilities the family is required to fulfill, as well as prohibited actions. HACB will inform families of these obligations during the oral briefing, and the same information must be included in the briefing packet. When the family's unit is approved and the HAP contract is executed, the family must meet those obligations in order to continue participating in the program. Violation of any family obligation may result in termination of assistance.

Time Frames for Reporting Changes Required By Family Obligations

- Unless otherwise noted below, when family obligations require the family to respond to a request or notify HACB of a change, notifying HACB of the request or change within ten (10) business days is considered prompt notice.
- *When a family is required to provide notice to HACB, the notice must be in writing.*

Family Obligations [24 CFR 982.551]

Following is a listing of a participant family's obligations under the HCV program:

- The family must supply any information that HACB or HUD determines to be necessary, including submission of required evidence of citizenship or eligible immigration status.
- The family must supply any information requested by HACB or HUD for use in a regularly scheduled reexamination or interim reexamination of family income and composition.
- The family must disclose and verify social security numbers and sign and submit consent forms for obtaining information.
- Any information supplied by the family must be true and complete.

- The family is responsible for any Housing Quality Standards (HQS) breach by the family caused by failure to pay tenant-provided utilities or appliances, or damages to the dwelling unit or premises beyond normal wear and tear caused by any member of the household or guest.

The inspector will determine if an HQS breach as identified in 24 CFR 982.404(b) is the responsibility of the family. Families may be given extensions to cure HQS breaches by the Director/Contractor.

- The family must allow HACB to inspect the unit at reasonable times and after reasonable notice.
- The family must not commit any serious or repeated violation of the lease.

HACB will determine if a family has committed serious or repeated violations of the lease, based on available evidence; including but not limited to, a court-ordered eviction or an owner's notice to evict.

Serious and repeated lease violations will include, but not be limited to, nonpayment of rent, disturbance of neighbors, destruction of property, or living or housekeeping habits that cause damage to the unit or premises and criminal activity. Generally, the criteria to be used are whether the reason for the eviction was through no fault of the tenant or guests.

- The family must notify HACB and the owner before moving out of the unit or terminating the lease.

The family must comply with lease requirements regarding written notice to the owner. The family must provide written notice to HACB at the same time the owner is notified.

- The family must promptly give HACB a copy of any owner eviction notice.

If the family requests assistance to move and they did not notify HACB of an eviction within 10 business days of receiving the Notice of Lease Termination, the move will be denied.

- The family must use the assisted unit for residence by the family. The unit must be the family's only residence.
- If HACB determines that the use of the unit is not incidental to its use as a dwelling unit, it will be considered a program violation.
- If HACB determines the unit is not legal, it will be considered a program violation.
- The composition of the assisted family residing in the unit must be approved by HACB. The family must promptly notify HACB in writing of the birth, adoption, or court-awarded custody of a child, marriage or co-habitant. The family must request both HACB and Landlord approval to add any other family member as an occupant of the unit.

The request to add a family member must be submitted in writing and approved by HACB and the owner prior to the person moving into the unit. HACB will determine eligibility of the new family member in accordance with the policies. HACB will not approve the addition of a family member if the approval requires an increase in voucher size or causes HQS violation.

HACB will deny a family's request to add additional family members who are:

- Persons who have been evicted from public housing.
- Persons who commit drug-related criminal activity or violent criminal activity.
- Persons who currently owe rent or other amounts to HACB or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act.
- Persons who have engaged in or threatened abusive or violent behavior toward HACB personnel.
- The family must notify HACB in writing, within 10 business days, if any family member no longer lives in the unit.

Families are required to notify HACB within 10 business days if any family member leaves the assisted household. When the family notifies HACB, they must furnish the following information:

- The date the family member moved out.
- The new address of the family member.
- Copy of lease
- Utilities Bills for new address
- Other supporting document

HACB will not process a rent change or an interim removing a family member who has income, if the Head of Household has failed to provide supporting documents, demonstrating residence elsewhere

- If HACB has given approval, a foster child or a live-in aide may reside in the unit. HACB has the discretion to adopt reasonable policies concerning residency by a foster child or a live-in aide, and to define when HACB consent may be given or denied.
- The family must not sublease the unit, assign the lease, or transfer the unit.

Subleasing includes receiving payment to cover rent and utility costs by a person living in the unit who is not listed as a family member.

- The family must supply any information requested by HACB to verify that the family is living in the unit or information related to family absence from the unit.

- The family must promptly notify HACB when the family is absent from the unit.

Notice is required under this provision only when all family members will be absent from the unit for an extended period. An extended period is defined as any period greater than 30 days. Written notice must be provided to HACB at the start of the extended absence.

- The family must pay utility bills and provide and maintain any appliances that the owner is not required providing under the lease [Form HUD-52646, Voucher]. The utility services must be in the Head or Co-Heads name if owner is not supplying as part of the lease.

- ***The family must not own or have any interest in the unit.***

The owner may not reside in the assisted unit regardless of whether (s)he is a member of the assisted family, .

- Family members must not commit fraud, bribery, or any other corrupt or criminal act in connection with the program.

In each case, HACB will consider which family members were involved, the circumstances, and any hardship that might be caused to innocent members.

- Family members must not engage in drug-related criminal activity or violent criminal activity or other criminal activity that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises. See for HUD and HACB policies related to drug-related and violent criminal activity.
- Members of the household must not engage in abuse of alcohol in a way that threatens the health, safety or right to peaceful enjoyment of the other residents and persons residing in the immediate vicinity of the premises. See HUD and HACB policies for a discussion of related to alcohol abuse.
- An assisted family or member of the family must not receive HCV program assistance while receiving another housing subsidy, for the same unit or a different unit under any other federal, state or local housing assistance program.
- A family must not receive HCV program assistance while residing in a unit owned by a parent, child, grandparent, grandchild, sister or brother of any member of the family, unless HACB has determined (and has notified the owner and the family of such determination) that approving rental of the unit, notwithstanding such relationship, would provide reasonable accommodation for a family member who is a person with disabilities. [Form HUD-52646, Voucher]

B. Subsidy Standards and Voucher Issuance

1. OVERVIEW

HACB will establish subsidy standards that determine the number of bedrooms needed for families of different sizes and compositions. This part presents the policies that will be used to determine the family unit size (also known as the voucher size) a particular family should receive, and the policies that govern making exceptions to those standards. HACB also will establish policies related to the issuance of the voucher, to the voucher term, and to any extensions or suspensions of that term.

2. DETERMINING FAMILY UNIT (VOUCHER) SIZE [24 CFR 982.402]

For each family, HACB determines the appropriate number of bedrooms under HACB subsidy standards and enters the family unit size on the voucher that is issued to the family. The family unit size does not dictate the size of unit the family must actually lease, nor does it determine who within a household will share a bedroom/sleeping room.

The following requirements apply when HACB determines family unit size:

- The subsidy standards must provide for the smallest number of bedrooms needed to house a family without overcrowding.
- The subsidy standards must be consistent with space requirements under the housing quality standards.
- The subsidy standards must be applied consistently for all families of like size and composition.
- Children age 3 and under may share a bedroom with any child regardless of age or parent;
- Two children of the opposite sex do not share a bedroom, although they may do so at the request of the family.
- Adults and a minors or the same sex share a bedroom
- Adults (over age eighteen) of the same sex share a bedroom;
- Adults (over age eighteen) of opposite sexes who are spouses or co-heads of household share a bedroom;
- Adults (over age eighteen) of opposite sexes who are not spouses or co-heads of household do not share a bedroom although they may do so at the request of the family.
- A single head of household parent shall not be required to share a bedroom with his/her child, age 4 and over, although they may do so at the request of the family.
- Exceptions to the largest permissible apartment size may be made upon approval in case of reasonable accommodations for a person with disabilities.
- An unborn child will not be counted as a person in determining apartment size.
- In determining unit size, HACB will count a child who is temporarily away from the home because the child has been placed in foster care, kinship care, or is away at school, so long as the family can document that the child will be living with the family before the next annual recertification date.

- A live-in aide may be assigned a bedroom. Single elderly or disabled residents with live-in attendants will be assigned two bedroom voucher.
- Unless a live-in-aide resides with a family, the family unit size for any family consisting of a single person must be either a zero- or one-bedroom unit, as determined under HACB subsidy standards.

HACB will reference the following chart in determining the appropriate voucher size for a family:

Voucher Size	Persons in Household (Minimum – Maximum)
0 Bedroom	1
1 Bedroom	1-2
2 Bedrooms	2-4
3 Bedrooms	3-6
4 Bedrooms	4-8
5 Bedrooms	5-10

3. EXCEPTIONS TO SUBSIDY STANDARDS

. Reasons for exceptions may include, but are not limited to:

HACB will consider granting an exception for any of the reasons specified in the regulation: the age, sex, health, handicap, or relationship of family members or other personal circumstances.

- A need for an additional bedroom for medical equipment
- A need for a separate bedroom for reasons related to a family member’s disability, medical or health condition

For a single person who is not elderly, disabled, or a remaining family member, an exception cannot override the regulatory limit of a zero or one bedroom [24 CFR 982.402(b)(8)].

The family must request any exception to the subsidy standards in writing. The request must explain the need or justification for a larger family unit size, and must include appropriate documentation. Requests based on health-related reasons must be verified by a knowledgeable professional source, unless the disability and the disability-related request for accommodation is readily apparent or otherwise known.

HACB will notify the family of its receipt of the family's request within 10 business days of receiving the family's request. HACB's Director for the HCVP will review all requests and determine the eligibility of the request. If a participant family's request is denied, the notice will inform the family of their right to request an informal hearing.

HACB Error

If HACB errs in the bedroom size designation, the family will be issued a Voucher of the appropriate size before admission to the program. If HACB has err and family is already leased in al unit, correction of voucher size will take effect no less than 30 days of the discovery of the error. If family is in an intial lease unit and the correction of voucher size would causes the families tenant rent portion to exceedd 40% of family's income, the correction not take effect until next familys reexam date. Unless HACB can get the landlord to reduce the total contract rent.

Changes for Applicants

The voucher size is determined prior to the briefing by comparing the family composition to HACB subsidy standards. If an applicant requires a change in the voucher size, based on the requirements of HACB subsidy standards, the above-referenced guidelines will apply.

Changes for Participants

The members of the family residing in the unit must be approved by HACB. The family must obtain approval of any additional family member before the new member occupies the unit except for additions by birth, adoption, or court-awarded custody, in which case the family must inform HACB within ten (10) business days. The above referenced guidelines will apply.

Underhoused Families

If a unit does not meet HQS space standards due to an increase in family size, (unit too small), HACB will issue a new voucher of the appropriate size and assist the family in locating a suitable unit.

HACB will also notify the family of the circumstances under which an exception will be granted, such as:

- If a family with a disability is under housed in an accessible unit.
- If a family requires the additional bedroom because of a health problem, which has, been verified by HACB.
- HACB and family have been unable to locate a unit within 120 days.

Transfer Waiting List

When a change in family composition requires a larger Voucher size and no funds are available, the family will be placed on a Transfer List.

Families will be selected from the Transfer List before families are selected from the applicant waiting list. This assures that families who are already on the program are in the appropriate sized units.

Families will be selected from this list when there is available funding, in the following sequence:

- A participant family (whose family composition has been approved by HACB) who requires a change in Voucher size because they are living in a unit, which is overcrowded according to Housing Quality Standards.
- A participant family (whose family composition has been approved by HACB) that requires a change in Voucher size under the Subsidy Standards, but not under Housing Quality Standards.
- All others who require a transfer as determined by HACB.

UNIT SIZE SELECTED [24 CFR 982.402(c)]

The family may select a different size dwelling unit than that listed on the Voucher. There are three criteria to consider:

1. *Subsidy Limitation:* The family unit size as determined for a family under HACB's subsidy standard for a family assisted in the voucher program is based on HACB's adopted payment standards. The payment standard for a family shall be the *lower of*:
 - The payment standard amount for the family unit size; or
 - The payment standard amount for the unit size rented by the family.
2. *Utility Allowance:* The utility allowance used to calculate the gross rent is based on the actual size of the unit the family selects, regardless of the size authorized on the family's Voucher.
3. *Housing Quality Standards:* The standards allow two persons per living/sleeping room and permit maximum occupancy levels (assuming a living room is used as a living/sleeping area) as shown in the table below. The levels may be exceeded if a room in addition to bedrooms and living room is used for sleeping.

***HQS GUIDELINES FOR UNIT SIZE SELECTED**

Unit Size	Maximum Number in Household
0 Bedroom	1
1 Bedroom	2
2 Bedrooms	4
3 Bedrooms	6
4 Bedrooms	8
5 Bedrooms	10
6 Bedrooms	12

4. VOUCHER ISSUANCE [24 CFR 982.302]

When a family is selected from the waiting list, or when a participant family wants to move to another unit, HACB issues a Housing Choice Voucher, form HUD-52646. This chapter deals only with voucher issuance for applicants. For voucher issuance associated with moves of program participants.

The voucher is the family's authorization to search for housing. It specifies the unit size for which the family qualifies, and includes both the date of voucher issuance and date of expiration. It contains a brief description of how the program works and explains the family obligations under the program. The voucher is evidence that HACB has determined the family to be eligible for the program, and that HACB expects to have money available to subsidize the family if the family finds an approvable unit. However, HACB does not have any liability to any party by the issuance of the voucher, and the voucher does not give the family any right to participate in HACB's housing choice voucher program [Voucher, form HUD-52646]

A voucher will be issued to an applicant family only after HACB has determined that the family is eligible for the program based on information received within the 60 days prior to issuance [24 CFR 982.201(e)] and after the family has attended an oral briefing [HCV 8-1].

Vouchers will be issued to eligible applicants during the briefing session.

Prior to issuing any vouchers, HACB will determine whether it has sufficient funding in accordance with the policies.

If HACB determines that there is insufficient funding after a voucher has been issued, HACB will rescind the voucher and place the affected family back on the waiting list.

5. VOUCHER TERM, EXTENSIONS, AND SUSPENSIONS

Voucher Term [24 CFR 982.303]

The initial voucher term will be sixty (60) days.

The family must submit a Request for Tenancy Approval (RFTA) HUD 52517 and proposed lease within the 60-day period unless HACB grants an extension.

Extensions of Voucher Term [24 CFR 982.303(b)]

If initial voucher has expired, and has not been extended by HACB or expires after an extension, the family will be denied assistance. The family will not be entitled to a review or hearing. If the family is currently assisted, they may remain as a participant in their unit if there is an assisted lease/contract in effect.

Once HACB reaches 98% Utilization, the following applies:

A family must request for an extension of the voucher in writing.

HACB extends in one or more increments up to a maximum of an additional 60 days primarily for these reasons:

- HACB is satisfied that the family has made a reasonable effort to locate a unit, including seeking the assistance of HACB, throughout the initial sixty-day period. A completed search record is required
- The family was prevented from finding a unit due to disability accessibility requirements or large size units, four (4) or more bedrooms. The Search Record is part of the required verification.

HACB will approve additional extensions only in the following circumstances:

- It is necessary as a reasonable accommodation for a person with disabilities.
- It is necessary due to reasons beyond the family's control, as determined by HACB. Following is a list of extenuating circumstances that HACB may **consider** in making its decision. The presence of these circumstances does not guarantee that an extension will be granted:
 - Serious illness or death in the family
 - Other family emergency
 - Obstacles due to employment
 - Whether the family has already submitted requests for tenancy approval that were not approved by HACB
 - Whether family size or other special requirements make finding a unit difficult

Any request for an additional extension must include the reason(s) an additional extension is necessary. HACB may require the family to provide documentation to support the request.

All requests for extensions to the voucher term must be made in writing and submitted to HACB prior to the expiration date of the voucher (or extended term of the voucher). HACB will decide whether to approve or deny an extension request within 10 business days of the date the request is received, and will immediately provide the family written notice of its decision.

Unless approved by the Director, no more than two (2) extensions of thirty (30) days or less will be granted and never to total more than an additional sixty days (except in the case of reasonable accommodation).

If the family requests an extension as a reasonable accommodation to make the program accessible to and usable by a family member with a disability and needs an extension in excess of 120 days, HACB will extend the voucher term for the amount of time reasonably required for said reasonable accommodation up to an additional 60 days.

If HACB's utilization rate is below 98%, HACB may extend the term to 120 days from the beginning of the initial term, provided that the family must submit a search record on the 70th day of the term of the voucher, and if a search record is not submitted, by the deadline date, the voucher will automatically expire.

Suspensions of Voucher Term [24 CFR 982.303(c)]

If the family has submitted a Request for Tenancy Approval (RFTA) during the voucher term, HACB will stop the clock on a family's voucher term from the time a family submits the RFTA until the time HACB approves or denies the request.

Expiration of a Voucher Term

HACB will notify the family in writing within ten (10) business days of the expiration of the voucher term or extension that the voucher has expired and that the family may reapply if the waitlist(s) are open, in order to be placed on the waiting list.

Assistance to Voucher Holders

Families who require additional assistance during their search may call HACB Office to request assistance. Voucher holders will be notified at their briefing session that HACB periodically updates the listing of available units and how the updated list may be obtained.

HACB will assist families with negotiations with owners and provide other assistance related to the families' search for housing.

6. VOUCHER ISSUANCE DETERMINATION FOR SPLIT HOUSEHOLDS [24 CFR 982.315]

In those instances when a family assisted under the Section 8 program becomes divided into two otherwise eligible families due to divorce, legal separation, or the division of the family, and the new families cannot agree as to which new family unit should continue to receive the assistance, and there is no determination by a court, the Director shall consider the following factors to determine which of the families will continue to be assisted:

- Which of the two new family units has custody of dependent children
- Which family member was the head of household when the voucher was initially issued (listed on the initial application).
- Whether domestic violence was involved in the breakup. In which case, the family member must present a restraining or protective order against the offender.

Documentation of these factors will be the responsibility of the requesting parties. If documentation is not provided, HACB will terminate assistance on the basis of failure to provide information necessary for a recertification.

7. REMAINING MEMBER OF TENANT FAMILY - RETENTION OF VOUCHER [24 CFR 982.315]

To be considered the remaining member of the tenant family, the person must be of legal age and have been previously approved by HACB to be living in the unit. Approved member must have been part of the House Hold Composition for at least 3 years.

A live-in attendant, by definition, is not a member of the family and will not be considered a remaining member of the Family.

In order for a minor child to continue to receive assistance as a remaining family member:

- (1) If a responsible agency has determined that another adult is to be brought into the assisted unit to care for a child for an indefinite period, the designated caretaker will not be considered a family member until a determination of custody or legal guardianship is made.
- (2) If a caretaker has assumed responsibility for a child without the involvement of a responsible agency or formal assignment of custody or legal guardianship, the caretaker **will** be treated as a visitor for 30 days. After the 30 days has lapsed, the caretaker **may** be considered a family member. If information is provided that would confirm that the caretaker's role is temporary. In such cases the PHA will extend the caretaker's status as an eligible visitor.
- (3) At any time that custody or guardianship legally has been awarded to a caretaker, the housing choice voucher will be transferred to the caretaker.
- (4) During any period that a caretaker is considered a visitor, the income of the caretaker is not counted in annual income and the caretaker does not qualify the family for any deductions from income.

All Custodial, Guardian awarded care take must pass HACB screening process in this policy.

A reduction in family size may require a reduction in the voucher family unit size.

C. Expanding Housing Opportunities

It is HACB's aim to promote expanded housing opportunities for Section 8-assisted families in neighborhoods outside areas of poverty or minority concentration.

The majority of neighborhoods within the jurisdiction of the City of Bridgeport are areas of poverty or minority concentration. Therefore, HACB's efforts include housing opportunities in surrounding communities.

HACB will undertake the following as part of our efforts to help Section 8 families' access expanded housing opportunities:

- HACB will conduct outreach efforts and periodic “landlord workshops” to attract owners of units located outside areas of poverty or minority concentration, and to guide HACB in developing procedures and in improving its operations in order to attract and maintain landlords.
- HACB has prepared maps and data to show neighborhoods outside areas of poverty or minority concentration.
- HACB will develop detailed materials regarding expanding housing opportunities for new voucher recipients, mover families, and all other Section 8 families, to be provided at briefings and recertification interviews. These materials will include visual maps as well as information about schools, employment opportunities, transportation, and other community resources and services. In addition, these materials will include detailed information regarding the portability of Section 8 assistance, including contact information for the portability staff at other PHAs in the greater Bridgeport area. These materials will also include contact information for community organizations that may assist Section 8 families in finding units and providing other services to help the family assimilate in a new community.
- HACB will make efforts in providing services to assist families interested in moving to neighborhoods outside areas of minority concentration.
- HACB will identify exception rent neighborhoods and may request HUD approval of additional exception rents in high-rent non-impacted neighborhoods.
- HACB is reviewing its Section 8 procedures and may establish procedural changes and incentives to make our Section 8 program more attractive to good landlords.
- HACB landlords maintain a rental listing of apartments available by website. HACB will continue to maintain this apartment listing and will continue to build relationships with new landlords and encourage their submission of available apartments.

HACB will examine at least annually the outcomes of its efforts to promote expanded housing opportunities, and may revise its strategies in accord with this analysis. HACB’s strategies may include seeking HUD approval of exception rents.

VI. Definitions used in Determining Income and Rent

A. Annual Income 24 CFR § 5.609

HACB shall use HUD's definition of Annual Income. Should this definition be revised, HUD's definition, rather than that presented below shall be used.

Annual income is the anticipated total income from all sources, including net income derived from assets, received by the family head and spouse (even if temporarily absent) and by each additional family member including all net income from assets for the 12-month period following the effective date of initial determination or reexamination of income, exclusive of income that is temporary, non-recurring, or sporadic as defined below, or is specifically excluded from income by other federal statute. Annual income includes but is not limited to:

1. The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services;
2. The net income from operation of a business or profession, including any withdrawal of cash or assets from the operation of the business. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining the net income from a business. An allowance for the straight line depreciation of assets used in a business or profession may be deducted as provided in IRS regulations. Withdrawals of cash or assets will not be considered income when used to reimburse the family for cash or assets invested in the business;
3. Interest, dividends, and other net income of any kind from real or personal property provided that the total value of family assets exceeds \$5,000. Expenditures for amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for the straight line depreciation of real or personal property is permitted. Withdrawals of cash or assets will not be considered income when used to reimburse the family for cash or assets invested in the property;
4. If the Family has Net Family Assets in excess of \$5,000, Annual Income shall include the greater of the actual income derived from all Net Family Assets or a percentage of the value of such Assets based on the current passbook savings rate as determined by HUD;
5. For assets valued at more than \$5,000 that are disposed for less than the fair market value within the past two years, the difference between the market value of the asset and the actual payment received for the disposition of said asset, minus any costs for the disposition. The difference shall be included in determining total assets for two years.
6. The full amount of periodic payments received from social security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts [See B. 12. below for treatment of delayed or deferred periodic payment of social security or supplemental security income benefits.];
7. Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation, and severance pay (But see paragraph B. 3. below concerning treatment of lump-sum additions as Family assets.);
8. All welfare assistance payments (Temporary Assistance to Needy Families, General Assistance) received by or on behalf of any family member;

9. Periodic and determinable allowances, such as alimony and child support payments, and regular cash and non-cash contributions or gifts received from agencies or persons not residing in the dwelling made to or on behalf of family members; and
10. All regular pay, special pay, and allowances of a family member in the Armed Forces. (See paragraph B. 7. below concerning pay for exposure to hostile fire.);

B. Excluded Income 24 CFR § 5.609

Annual Income does not include the following:

1. Income from the employment of children (including foster children) under the age of 18 years;
2. Payments received for the care of foster children or foster adults (usually individuals with disabilities, unrelated to the resident family, who are unable to live alone);
3. Lump sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance, and worker's compensation), capital gains, one-time lottery winnings, and settlement for personal property losses (but see paragraphs 5 and 6 above if the payments are or will be periodic in nature);
[See paragraph 12. below for treatment of delayed or deferred periodic payments of social security or supplemental security income benefits.]
4. Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member;
5. Income of a live-in aide provided the person meets the definition of a live-in aide;
6. The full amount of student financial assistance paid directly to the student or the educational institution;
7. The special pay to a family member serving in the Armed Forces who is exposed to hostile fire;
8. Certain amounts received that are related to participation in the following programs:
 - a. Amounts received under HUD funded training programs (e.g. Step-up program: excludes stipends, wages, transportation payments, child care vouchers, etc. for the duration of the training);
 - b. Amounts received by a person with disabilities that are disregarded for a limited time for purposes of Supplemental Security Income and benefits that are set aside for use under a Plan to Attain Self-Sufficiency (PASS);
 - c. Amounts received by a participant in other publicly assisted programs that are specifically for, or in reimbursement of, out-of-pocket expenses incurred (special equipment, clothing, transportation, child care, etc.) to allow participation in a specific program;
 - d. A resident services stipend. A resident services stipend is a modest amount (not to exceed \$200/month) received by a resident for performing a service for HACB, on a part-time basis, that enhances the quality of life. Such services may include but are not limited to, fire patrol, hall monitoring, lawn maintenance, and resident initiatives coordination. No resident may receive more than one such stipend during the same period of time;

- e. Incremental earnings and/or benefits resulting to any family member from participation in qualifying federal, state or local employment training program (including training programs not affiliated with the local government), and training of family members as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for a limited period as determined in advance by HACB ;
- 9. Temporary, non-recurring, or sporadic income (including gifts);
- 10. Reparation payments paid by foreign governments pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;
- 11. The Earned Income Disregard Shall is allowed as permitted 24 CFR Part 5.617. HACB will continue to implement the Earned Income Disregard (EID). The maximum amount of time a family may participate in the program combined with the Family Self Sufficiency Program (FSS) is 48 months.

In no event shall the family receive the exclusion provided for under this subparagraph during the same period said family member is receiving a disregard from earned income (Earned Income Disregard) as set forth in 24 CFR Part 5.617. In addition, the total number of months that a family may receive the exclusion provided for under this subparagraph and under the EID may not exceed 48 months.

- 12. Deferred periodic payments of supplemental security income and social security benefits that are received in a lump sum payment;
- 13. Amounts received by the family in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit;
- 14. Amounts paid by a State agency to a family with a developmentally disabled family member living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home;
- 15. Amounts specifically excluded by any other Federal Statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under the United States Housing Act of 1937. (A notice will be published by HUD in the Federal Register identifying the benefits that qualify for this exclusion. Updates will be published and distributed when necessary.)

The following is a list of benefits excluded by other Federal Statute:

- a. The value of the allotment provided to an eligible household for coupons under the Food Stamp Act of 1977; **7 USC 2017 (h)**
- b. Payments to volunteers under the Domestic Volunteer Service Act of 1973; **42 USC 5044 (g), 5088**
- c. Examples of programs under this Act include but are not limited to:
 - the Retired Senior Volunteer Program (RSVP), Foster Grandparent Program (FGP), Senior Companion Program (SCP), and the Older American Committee Service Program;
 - National Volunteer Antipoverty Programs such as VISTA, Peace Corps, Service Learning Program, and Special Volunteer Programs;
 - Small Business Administration Programs such as the National Volunteer Program to Assist Small Business and Promote Volunteer Service to Persons with Business Experience, Service Corps of Retired Executives (SCORE), and Active Corps of Executives (ACE).

- d. Payments received under the Alaska Native Claims Settlement Act; **43 USC.1626 (a)**
- e. Income derived from certain sub marginal land of the United States that is held in trust for certain Indian tribes; **25 USC. 459e**
- f. Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program; **42 USC 8624 (f)**
- g. Payments received under programs funded in whole or in part under the Job Training Partnership Act; **29 USC 1552 (b)**
- h. Income derived from the disposition of funds of the Grand River Band of Ottawa Indians; **Pub. L. 94-540, 90 State 2503-04**
- i. The first \$2000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the Court of Claims **25 USC 1407-08**, or from funds held in trust for an Indian Tribe by the Secretary of Interior; **25 USC 117b, 1407**; and
- j. Amounts of scholarships funded under Title IV of the Higher Education Act of 1965 including awards under the Federal work-study program or under the Bureau of Indian Affairs student assistance programs; **20 USC 1087 uu**
 — Examples of Title IV programs include but are not limited to: Basic Educational Opportunity Grants (Pell Grants), Supplemental Opportunity Grants, State Student Incentive Grants, College Work Study, and Byrd Scholarships.
- k. Payments received from programs funded under Title V of the Older Americans Act of 1965; **42 USC 3056 (f)**
 — Examples of programs under this act include but are not limited to: Senior Community Services Employment Program (CSEP), National Caucus Center on the Black Aged, National Urban League, Association National Pro Personas Mayores, National Council on Aging, American Association of Retired Persons, National Council on Senior Citizens, and Green Thumb.
- l. Payments received after January 1, 1989 from the Agent Orange Settlement Fund or any other fund established in the In Re Agent Orange product liability litigation;
- m. Payments received under Maine Indian Claims Settlement Act of 1980; **Pub.L. 96-420,94 Stat. 1785**
- n. The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990; **42 USC 9858q**
- o. Earned income tax credit refund payments received on or after January 1, 1991; **26 USC 32 (j)**
- p. Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation;
- q. Allowances, earnings and payments to AmeriCorps participants under the National and Community Service Act of 1990;
- r. Any allowance paid under the provisions of **38 U.S.C. 1805** to a child suffering from spina bifida who is the child of a Vietnam veteran;
- s. Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act; and

- t. Allowances, earnings, and payments to individuals participating in programs under the Workforce Investment Act of 1998.
- 16. Income derived from assets with a market value of \$50,000 or less.
- 17. All adoption assistance payments will be excluded from income calculations under Section 5.609(c) (8) (v) as the \$480 dependent deduction is eliminated.

C. Anticipating Annual Income 24 CFR § 5.609(d)

If it is not feasible to anticipate income for a 12-month period, the Authority may use the annualized income anticipated for a shorter period, subject to an Interim Adjustment at the end of the shorter period. (This method would be used for persons who are only paid for 9 months, or for tenants receiving unemployment compensation.)

For All Families

1. **Child Care Expenses** — A deduction of amounts anticipated to be paid by the family for the care of children under 13 years of age for the period for which Annual Income is computed, BUT ONLY when such care is necessary to enable a family member to be gainfully employed, to seek employment or to further his/her education. Amounts deducted must be unreimbursed expenses and shall not exceed: (a) the amount of income earned by the family member released to work; or (b) an amount determined to be reasonable by HACB when the expense is incurred to permit education or to seek employment.
In order to receive these credit copies of cancelled checks and/or money orders must be submitted.
2. **Dependent Deduction** — An exemption of \$480 for each member of the family residing in the household (other than the head of household, or spouse, Live-in Aide, foster adult or foster child) who is under eighteen years of age or who is eighteen years of age or older and disabled, or a full-time student.
3. **Work-related Disability Expenses** — A deduction of unreimbursed amounts paid for attendant care or auxiliary apparatus expenses for family members with disabilities where such expenses are necessary to permit a family member(s), including the disabled member, to be employed. In no event may the amount of the deduction exceed the employment income earned by the family member(s) freed to work.

Equipment and auxiliary apparatus may include but are not limited to: wheelchairs, lifts, reading devices for the visually impaired, and equipment added to cars and vans to permit their use by the disabled family member. Also included would be the annualized cost differential between a car and the cost of a van required by the family member with disabilities.

- a. For non-elderly families and elderly or disabled families without medical expenses: the amount of the deduction equals the cost of all unreimbursed expenses for work-related disability expense less three percent of Annual Income, provided the amount so calculated does not exceed the employment income earned.
- b. For elderly or disabled families with medical expenses: the amount of the deduction equals the cost of all unreimbursed expenses for work-related disability expense less three percent of Annual Income (provided the amount so calculated does not exceed the employment income earned) PLUS medical expenses as defined below.

For elderly and disabled families only:

4. **Medical Expense Deduction** — A deduction of unreimbursed Medical Expenses, including insurance premiums, anticipated for the period for which Annual Income is computed.

Medical expenses include but are not limited to: services of physicians and other health care professionals, services of health care facilities, health insurance premiums (including the cost of Medicare), prescription and non-prescription medicines, transportation to and from treatment, dental expenses, eyeglasses, hearing aids and batteries, attendant care (unrelated to employment of family members), and payments on accumulated medical bills. To be considered by HACB for the purpose of determining a deduction from income, the expenses claimed must be verifiable.

- a. For elderly or disabled families without work-related disability expenses: The amount of the deduction shall equal total medical expenses less three percent of annual income.
- b. For elderly or disabled families with both work-related disability expenses and medical expenses: the amount of the deduction is calculated as described in paragraph 3 (b) above.

VII. Income and Subsidy Determinations

A. Determination of Total Tenant Payment (TTP)

1. Total Tenant Payment (TTP) shall be determined as set forth in this Police and the HCVG Book and HUD guidelines. Rents shall be determined for each family by first determining its Annual Income in accordance with the definition set forth in Section this Administrative Plan.
2. Adoption Income (24 CFR Part 5.609c12)

All adoption assistance payments will be excluded from income calculations under Section 5.609(c) (8) (v) as the \$480 dependent deduction is eliminated.

3. Earnings from Full Time Students (24 CFR Part 5.609 c11)

All income earned by full-time college students will no longer be included in the determination of Annual Income since there will no longer be the \$480 dependent deduction to offset such income.

B. Mandatory Deductions (24 CFR Part 5.611(a))

The Mandatory Deductions provided for under 24 CFR Part 5.611(a) have been accounted for in the determining of the percentage used to determine the rent amount for each family under the Income Tiered rent approach, and as such, are no longer available to families. Family with extraordinary expenses and deductions may be able to qualify for the Exceptional Expenses provided for below.

C. Proration of Assistance for “Mixed” Families (24 CFR 5.520)

1. Applicability

Proration of assistance must be offered to any "mixed" applicant or participant family. A "mixed" family is one that includes at least one U.S. citizen or eligible immigrant and any number of ineligible members.

"Mixed" families that were participants on June 19, 1995, and that do not qualify for continued assistance must be offered prorated assistance. Applicants in mixed families are entitled to prorated assistance. Families that become mixed after June 19, 1995, by addition of an ineligible member are entitled to prorated assistance.

2. Prorated TTP Calculation for Mixed Families

Prorated assistance will be calculated by subtracting the Total Tenant Payment from the applicable Income Tiered Rent for the unit the family occupies to determine the Family Maximum Subsidy.

The family's TTP will be calculated by:

- Dividing the Family Maximum Subsidy by the number of persons in the family to determine Member Maximum Subsidy.
- Multiplying the Member Maximum Subsidy by the number of eligible family members to determine Eligible Subsidy.
- Subtracting the amount of Eligible Subsidy from the applicable Maximum Rent for the unit the family occupies to get the family's Revised Total Tenant Payment.

D. Income Changes Resulting from Welfare Program Requirement

HACB will not reduce the tenant's portion of the housing rent for families whose welfare assistance is reduced specifically because of:

Fraud; or failure to participate in an economic self-sufficiency program; or
Non-compliance with a work activities requirement

However, HACB will reduce the rent if the welfare assistance reduction is a result of:

The expiration of a lifetime time limit on receiving benefits; or

A situation where a family member has complied with welfare agency economic self-sufficiency or work activities requirements but cannot or has not obtained employment, for instance, in the situation where the family has complied with welfare program requirements, but the durational time limit, such as a cap on the length of time family can receive benefits, causes the family to lose their welfare benefits; or

- A family member has not complied with other welfare agency requirements.
- Benefits are reduced due to sanctions for failure to comply with a behavioral condition of the program other than one related to parental economic self-sufficiency HACB will reduce the rent under the usual income-based rent rules. Examples of such situations include benefit reductions for failure to comply with paternity establishment or immunization requirements.

Imputed welfare income is the amount of annual income not actually received by a family as a result of a specified welfare benefit reduction that is included in the family's income for rental contribution.

Imputed welfare income is not included in annual income if the family was not an assisted resident at the time of sanction.

The amount of imputed welfare income is offset by the amount of additional income a family receives that begins after the sanction was imposed.

When additional income is at least equal to the imputed welfare income, the imputed welfare income is reduced to zero.

E. Verification before Denying a Request to Reduce Rent

HACB will obtain written verification from the welfare agency stating that the family's benefits have been reduced for fraud or noncompliance before denying the family's request for rent reduction.

The welfare agency, at the request of HACB, will inform HACB of amount and term of specified welfare benefit reduction for the family; reason for the reduction; and subsequent changes in term or amount of reduction.

If the tenant believes that HACB has incorrectly refused to reduce the tenant's rent after a reduction in welfare assistance, the tenant can contest HACB's decision through HACB's Grievance Procedures.

F. Cooperation Agreements

HACB has a cooperation agreement in place with the local welfare agency that assists HACB in obtaining the necessary information regarding welfare sanctions.

G. Utility Allowance and Utility Reimbursement Payments

If the cost of utilities (excluding telephone or cable television) is not included in the Tenant Rent, a utility allowance will be deducted from the TTP as determined. The Utility Allowance is intended to help defray the cost of utilities not included in the rent. The allowances are based on the monthly cost of reasonable consumption of utilities in an energy conservative household, not on a family's actual consumption.

When the Utility Allowance exceeds the family's Total Tenant Payment, HACB will provide a Utility Reimbursement Payment for the family each month. The check will be made out directly to the tenant. The utility schedule will be updated annually or as needed based on current information concerning utility rates.

H. Participants Paid Utilities

The following requirements apply to participants living in units or developments with resident-paid utilities or applicants being admitted to such developments: Participants/applicants must obtain utility services in Head of Household or Co-heads name. Paying the utility bill is the participant's obligation under the lease. Failure to pay utilities is grounds for termination.

I. Applying Payment Standards [24 CFR 982.505]

1. Overview

HACB's schedule of payment standards is used to calculate housing assistance payments for HCV families. This section covers the application of HACB's payment standards. *Payment standard* is defined as "the maximum monthly assistance payment for a family assisted in the voucher program (before deducting the total tenant payment by the family)" [24 CFR 982.4(b)].

The payment standard for a family is the lower of (1) the payment standard for the family unit size, which is defined as the appropriate number of bedrooms for the family under HACB's subsidy standards [24 CFR 982.4(b)], or (2) the payment standard for the size of the dwelling unit rented by the family.

If HACB establishes an exception payment standard for a designated part of an FMR area and a family's unit is located in the exception area, HACB will use the appropriate payment standard for the exception area.

HACB is required to pay a monthly housing assistance payment (HAP) for a family that is the lower of (1) the payment standard for the family minus the family's TTP or (2) the gross rent for the family's unit minus the TTP.

If during the term of the HAP contract for a family's unit, the owner lowers the rent, HACB will recalculate the HAP using the lower of the initial payment standard or the gross rent for the unit [HCV GB, p. 7-8].

2. Changes in Payment Standards

When HACB revises its payment standards during the term of the HAP contract for a family's unit, it will apply the new payment standards in accordance with HUD regulations.

Decreases

If the amount on the payment standard schedule is decreased during the term of the HAP contract, the lower payment standard generally will be used beginning at the effective date of the family's second regular reexamination following the effective date of the decrease in the payment standard. HACB will determine the payment standard for the family as follows:

Step 1: At the first regular reexamination following the decrease in the payment standard, HACB will determine the payment standard for the family using the lower of the payment standard for the family unit size or the size of the dwelling unit rented by the family.

Step 2: HACB will compare the payment standard from step 1 to the payment standard last used to calculate the monthly housing assistance payment for the family. The payment standard used by HACB at the first regular reexamination following the decrease in the payment standard will be the higher of these two payment standards. HACB will advise the family that the application of the lower payment standard will be deferred until the second regular reexamination following the effective date of the decrease in the payment standard.

Step 3: At the second regular reexamination following the decrease in the payment standard, the lower payment standard will be used to calculate the monthly housing assistance payment for the family unless HACB has subsequently increased the payment standard, in which case the payment standard will be determined in accordance with procedures for increases in payment standards described below.

Increases

If the payment standard is increased during the term of the HAP contract, the increased payment standard will be used to calculate the monthly housing assistance payment for the family beginning on the effective date of the family's first regular reexamination on or after the effective date of the increase in the payment standard.

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

3. Changes in Family Unit Size

Irrespective of any increase or decrease in the payment standard, if the family unit size increases or decreases during the HAP contract term, the new family unit size must be used to determine the payment standard for the family beginning at the family's first regular reexamination following the change in family unit size.

4. Reasonable Accommodation

Upon the approval of a Reasonable Accommodation for a family requiring a higher payment standard as a reasonable accommodation for a family member who is a person with disabilities, HACB has established a higher payment standard.

J. Averaging Income

If HACB cannot anticipate Annual Income for a full 12-month period, it will average known sources of income that vary to compute an Annual Income.

Income from the previous year may be analyzed to determine the amount to anticipate when Upfront Income Verification or third party verification is not available.

If by averaging an estimate can be made for those families whose income fluctuates from month- to- month, this estimate will be used so that housing payments will not change from month to month.

This method used depends on the regularity, source and type of income.

K. Treatment of Specific Types of Income

1. Income of Person Permanently Confined to Nursing Home

If a family member is permanently confined to a nursing home or hospital and there is a qualifying eligible family member remaining in the unit, HACB will exclude the income of the permanently confined member from the determination of Annual Income for the family.

2. Alimony and Child Support (24 CFR 5.609(a) (7))

If the amount of child support or alimony received is less than the amount awarded by the court, HACB must use the amount awarded by the court unless the family can verify that they are not receiving the full amount. HACB will accept as verification that the family is receiving an amount less than the full amount if:

- HACB receives verification from the agency responsible for enforcement or collection, or
- The family furnishes documentation of child support or alimony collection action filed through a child support enforcement/collection agency, or has filed an enforcement or collection action through an attorney.

L. Minimum Rent

Families shall pay the minimum rent of \$50.00 even if the family reports they have no income. A hardship from the minimum rent may be applied for by the family in accordance with the procedures set forth below.

M. Financial Hardship Exemption from Minimum Rent Policy:

HACB will notify all families subject to minimum rent of their right to request a minimum rent hardship provision as set forth in the Policies and in accordance with the provisions set forth below. Prior to imposition of any change in rent, the household will be provided with advanced notice as required by their lease and/or governing documents. Households must request in writing a waiver. HACB will contact the family within 10 businesses for additional documents to process the request.

Hardship Criteria

Waiver Request Process

All waiver requests must be originated by family and must be submitted to the Director. It will be the responsibility of the family to complete an "Application for Hardship Waiver" form and to provide all documentation required to show eligibility. Once the Director receives the Application for Hardship Waiver as set forth above, the Application shall be forwarded for Review.

HACB must suspend the minimum rent requirement beginning the first day of the next month following the date the family's request for a hardship exemption is received by HACB. All requests shall be deemed to be for a 90 day period beginning on the first day of the first month after the date of the request by the family. The minimum rent shall be re-instated after the end of said 90 day period.

If HACB determines that a qualifying financial hardship is temporary (i.e., is for a period of less than 90 days), HACB shall reinstate the minimum rent from the beginning of the suspension of the minimum rent. HACB shall offer the family a reasonable repayment agreement, on terms and conditions established by HACB, for the amount of back minimum rent owed by the family.

The Director shall render a decision on the request and a written decision shall be forwarded to the Executive Director for signature. The Executive Director may sustain or decline the recommendation of the Director. After approval or denial by the Executive Director, the Director will inform the family of the decision within ten (10) business days. The written decision shall inform the parties as to the relief granted as well as the term of the relief. Families that disagree with the decision may request a grievance through HACB grievance process. In cases where an appeal is sought, no action shall be taken by HACB until the grievance process is completed.

VIII. Verification Procedures

The Housing Choice Voucher (HCV) Program is a means tested program – that is, the rents residents pay are generally based on their incomes and the deductions for which the families qualify. Unless the Authority performs high quality verification, the Authority may not charge the correct rent and HUD may under or over-subsidize the program. HACB will conduct verification in accordance with the procedures set forth in the Procedures on Verification.

HUD regulations require that the factors of eligibility and Total Tenant Payment be verified by HACB. Applicants and program tenants must furnish proof of their statements whenever required by HACB, and the information they provide must be true and complete. HACB's verification procedures are designed to meet HUD's requirements and to maintain program integrity. HACB will ensure that proper authorization for release of information is always obtained from the family before making verification inquiries.

A. Methods of Verification and Time Allowed

1. Requirements for Third Party Verification

Third-party verification (which includes up-front verification) is required for all factors related to (a) reported family income; (b) the value of assets; and (c) expenses related to Exceptional Expenses from annual income. In addition, HACB uses the same standards for verifications related to applicant screening and qualification for preferences.

There are situations in which third party verification is not available. Exceptions to the third-party verification requirements include instances where:

HACB made at least 2 documented attempts to obtain third party verification, without success.

The income source does not have the capability to provide written or oral third party verifications.

If third party verification is not received directly from the source, HACB staff will document the file as to why third party verification was impossible to obtain and another method was used (such as reviewing documents families provide.)

2. Third Party Verification Requirements

- *Annual Income from Wages and Salaries:*
- *Asset Valued*
- *Expense, allowance and deductions*
- *Primary Documents:* Third-party verification is not required when legal documents are the primary source, such as birth certificate or other legal documentation of birth are the primary sources, such as birth certificate or other legal documentation of birth.

B. Prioritization of Verification Methods

HACB will use upfront income verification (or, in HUD's terminology, Enterprise Income Verification or EIV) as well as Department of Labor (DOL) first and whenever possible. If upfront verification is **not** available, HACB will pursue third party written verification, in which verification forms are mailed, faxed, or emailed directly to the independent source. In the event that the third-party independent source fails to respond to written verification requests, HACB staff will contact the third-party independent source by telephone or in person to obtain the verification.

C. Required Consent by Applicants and Participants

All adults, and head of house and spouse regardless of age, are required to sign HUD form 9886, Authorization for Release of Information/Privacy Act Notice, and other required consent forms. The HUD Form 9886 authorizes HUD and HACB to obtain third-party verification of the following: (a) Any income information from State Wage Information Collection Agencies (SWICA), and (b) Income information obtained from previous and current employers. The HUD Form 9886 authorizes HUD and HACB to obtain direct third party verification of income information from the SSA and the IRS.

Family members will be required to sign specific HACB authorization forms when information is needed that is not covered by the HUD form 9886.

Each member requested to consent to the release of information will be provided with a copy of the appropriate forms for their review and signature.

Family refusal to cooperate with the HUD prescribed verification system will result in denial of admission or termination of tenancy because it is a family obligation under tenancy to supply any information requested by HACB or HUD.

D. Verifying Non-Financial Factors

1. Verification of Legal Identity

In order to prevent program abuse, the PHA will require applicants to furnish verification of legal identity for all family members.

The documents listed below will be considered acceptable verification of legal identity for adults. If a document submitted by a family is illegible or otherwise questionable, more than one of these documents may be required.

- Certificate of Birth, naturalization papers
- Church issued baptismal certificate
- Current, valid Driver's license
- U.S. military discharge (DD 214)
- U.S. passport
- Voter's registration
- Company/agency Identification Card
- Department of Motor Vehicles Identification Card

Documents considered acceptable for the verification of legal identity for minors may be one or more of the following:

- Certificate of Birth
- Adoption papers
- Custody agreement
- Health and Human Services ID
- School records

If none of these documents can be provided, a third party who knows the person may, at the PHA's discretion, provide verification.

2. Familial Relationships

Verification of familial relationship may include:

- Official identification showing name
- Birth Certificates
- Baptismal certificates
- Marriage licenses, or other public documents, decrees, or licenses

Verification of guardianship is:

- Court-ordered assignment, or
- Documentation demonstrating that the family member receives benefits or medical insurance on behalf of the child at that address.
- For children who are the subject of joint-custody assignment, verification should include court documents indicating the child's primary home address.
- School documents showing the parent/guardian on file and address where the children reside

3. Verification of Permanent Absence of Adult Member

If an adult member who was formerly a member of the household is reported permanently absent by the family, the PHA will consider any of the following as verification:

- Court documents demonstrating that husband or wife institutes divorce action or legal separation.
- Order of protection/restraining order obtained by one family member against another.
- Proof of another home address, such as utility bills, canceled checks for rent, driver's license, or lease or rental agreement, if available.
- Department of Labor records, pay stubs, tax returns, or records of another public agency, obtained through third-party verification that indicates the new address of the family member.

If the adult family member is incarcerated, a document from the Court or prison should be obtained stating how long they will be incarcerated.

4. Verification of Family Composition

The PHA may verify changes in family composition (either reported or unreported) through letters, telephone calls, utility records, inspections, landlords, neighbors, credit data, school or DMV records, and other sources.

5. Verification of Disability

Verification of disability must be receipt of SSI or SSA disability payments under 42 U.S.C. Section 423(d)(1)(A) of the Social Security Act or 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 6001(8) or verified by appropriate physician or licensed practitioner, using the HUD language as the verification format.

6. Verification of Citizenship/Eligible Immigrant Status

To be eligible for assistance, individuals must be U.S. citizens or eligible immigrants. Individuals who are neither may elect not to contend their status. Eligible immigrants must fall into one of the categories specified by the regulations and must have their status verified by the U.S. Citizenship and Immigration Services (USCIS). Each family member must declare their status once unless their status is subject to change. Assistance cannot be delayed, denied, or terminated while verification of status is pending except that assistance to applicants may be delayed while the PHA hearing is pending.

If HACB discovers that citizenship information provided is fraudulent, expired, or otherwise invalid, it will notify the family or individual of the results of these findings. The family or individual will then have 30 days from the date of the notification to file an appeal with the USCIS to correct the problem. The family or individual must provide a copy of the appeal request to the USCIS to HACB, which will become a permanent item in the resident file. HACB can extend this 30 day appeal period at its sole discretion if good cause is found.

Citizens or Nationals of the United States are required to sign a declaration under penalty of perjury.

Eligible Immigrants are required to sign a declaration of eligible immigration status and provide proof of age.

Non-citizens with eligible immigration status must sign a declaration of status and verification consent form and provide their original immigration documents which are copied front and back and returned to the family. The PHA verifies the status through the USCIS SAVE system. If this primary verification fails to verify status, the PHA must request within ten business days that the USCIS conduct a manual search.

Family members who do not claim to be citizens or eligible immigrants must be listed on a statement of non-contending family members signed by the head of household or spouse.

Noncitizen students on student visas are ineligible members even though they are in the country lawfully. They must provide their student visa but their status will not be verified and they do not sign a declaration but are listed on the statement of non-contending members.

Failure to Provide. If an applicant or tenant family member fails to sign required declarations and consent forms or provide documents, as required, they must be listed as an ineligible member. If the entire family fails to provide and sign as required, the family may be denied or terminated for failure to provide required information.

Time of Verification. For applicants, verification of U.S. citizenship/eligible immigrant status occurs at the same time as verification of other factors of eligibility for final eligibility determination. For tenant families, it is done at the first regular recertification after June 19, 1995. PHAs that previously elected to "opt out" must immediately commence verification of families for whom eligibility status has not been undertaken. For family members added after other members have been verified, the verification occurs at the first recertification after the new member moves in. Once verification has been completed for any covered program, it need not be repeated except that, in the case of port-in families, if the initial PHA does not supply the documents, the PHA must conduct the determination.

Extensions of Time to Provide Documents. The PHA will grant an extension of 30 days for families to submit evidence of eligible immigrant status.

Acceptable Documents of Eligible Immigration. The regulations stipulate that only the following documents are acceptable unless changes are published in the Federal Register.

- Resident Alien Card (I-551)
- Alien Registration Receipt Card (I-151)
- Arrival-Departure Record (I-94)
- Temporary Resident Card (I-688)
- Employment Authorization Card (I-688B)
- Receipt issued by the USCIS for issuance of replacement of any of the above documents that shows individual's entitlement has been verified

A birth certificate is not acceptable verification of status. All documents in connection with U.S. citizenship/eligible immigrant status must be kept five years.

7. Verification of Social Security Numbers

Social security numbers must be provided as a condition of eligibility for all family members who will be assisted under the HCV Program (24 CFR 5.216, 24 CFR 5.219 and 24 CFR 5.233). Verification of Social Security numbers will be done through a Social Security Card issued by the Social Security Administration.

SSN Disclosure:

In accordance with 24 CFR 5.216, applicants and participants (including each member of the household) are required to disclose his/her assigned SSN, with the exception of the following individuals:

- a. Those individuals who do not contend to have eligible immigration status (individuals who may be unlawfully present in the United States). These individuals in most instances would not be eligible for a SSN.
 1. A family that consists of a single household member (including a pregnant individual) who does not have eligible immigration status is **not eligible** for housing assistance and cannot be housed.
 2. A family that consists of two or more household members **and at least one** household member that has eligible immigration status, is classified as a mixed family, and **is eligible** for prorated assistance in accordance with 24 CFR 5.520. The PHA may **not** deny assistance to mixed families due to nondisclosure of an SSN by an individual who does not contend to have eligible immigration status.
- b. Existing program participants as of January 31, 2010, who have previously disclosed their SSN and HUD has determined the SSN to be valid. PHAs may confirm HUD's validation of the participant's SSN by viewing the household's *Summary Report* or the *Identity Verification Report* in the EIV system.
- c. Existing program participants as of January 31, 2010, who are 62 years of age or older, and had not previously disclosed a valid SSN. This exemption continues even if the individual moves to a new assisted unit. Disclosure of SSNs is considered information subject to the Federal Privacy Act (5 USC 552a, as amended). In accordance with 24 CFR 5.212, the collection, maintenance, use, and dissemination of SSNs, any information derived from SSNs and income information must be conducted, to the extent applicable, in compliance with that Act and all other provisions of Federal, State, and local law. **Note:** There is no provision under HUD regulations which prohibit an individual (head of household with other eligible household members) with ineligible immigration status from executing a lease or other legally binding contract. However, some state laws prohibit an individual with ineligible immigration status from executing a contract (i.e. lease or other legal binding documents). If this is the case in your state, the family must **not** be admitted into the program. 4

8. SSN Documentation:

The PHA must request the applicant and participant (including each member of the household), who are not exempt under Section 5 of this Notice, to provide documentation of each disclosed SSN. Acceptable evidence of the SSN consists of:

- a. An original SSN card issued by SSA;
- b. An original SSA-issued document, which contains the name and SSN of the individual; or
- c. An original document issued by a federal, state, or local government agency, which contains the name and SSN of the individual.

It should be noted that most (if not all) individuals who are lawfully present in the U.S. have been assigned a SSN. Many existing laws require the disclosure of the SSN for various purposes.

All applicants and participants, including each member of the household (with the exception of those individuals noted in Section 5 of this Notice) are required to disclose his/her assigned SSN. The SSA issues three types of Social Security cards depending on an individual's citizen or noncitizen status and whether or not a noncitizen is authorized by the Department of Homeland Security (DHS) to work in the United States. They include:

1. The first type of card shows the individual's name and SSN only. This is the card most people have and reflects the fact that the holder can work in the U.S. without restriction. SSA issues this card to:
 - U.S. citizens; or
 - Noncitizens lawfully admitted to the United States for permanent residence and noncitizens with DHS permission to work permanently in the United States (i.e. refugees and asylees).
2. The second type of card bears, in addition to the individual's name and SSN, the legend: "**NOT VALID FOR EMPLOYMENT**". SSA issues this card to lawful noncitizens who do not have DHS permission to work, but are required by law to provide a SSN to obtain general assistance benefits that they already have qualified for.
3. The third type of card bears, in addition to the individual's name and SSN, the legend "**VALID FOR WORK ONLY WITH DHS AUTHORIZATION**". SSA issues this card to people with DHS permission to work temporarily in the United States. SSA verifies all noncitizens' documents with DHS before a SSN card is issued to a noncitizen.

9. Rejection of Documentation:

The PHA may reject documentation of the SSN provided by the applicant or participant for only the following reasons:

- a. The document is not an original document; or
- b. The original document has been altered, mutilated, or not legible; or
- c. The document appears to be a forged document (i.e. does not appear to be authentic).
The PHA should explain to the applicant or participant, the reason(s) the document is not acceptable and request the individual to obtain acceptable documentation of the SSN and submit it to the PHA within a specified time frame.

10. Verification of the SSN:

The PHA shall verify each disclosed SSN by:

- a. Obtaining the documentation listed under Section 6 of this Notice from applicants and participants (including each member of the household);
- b. Making a copy of the original documentation submitted, returning it to the individual, and retaining the copy in the file folder; and
- c. Recording the SSN on line 3n of the form HUD-50058, and transmitting the form HUD-50058 to HUD within a timely manner. PHAs are encouraged to transmit the form HUD-50058 within 30 calendar days of completing the form, to enable HUD to initiate its computer matching efforts.

8. Disability-Related Need for Larger Unit

Written verification that a larger unit is necessary to accommodate the disability-related needs of a person with disabilities must be obtained from a reliable, knowledgeable professional, according to HACB's reasonable accommodations procedures.

IX. Housing Quality Standards and Rent Reasonableness Determinations

INTRODUCTION

HUD requires that all units occupied by families receiving Housing Choice Voucher (HCV) assistance meet HUD's Housing Quality Standards (HQS) and permits HACB to establish additional requirements. The use of the term "HQS" in this plan refers to the combination of both HUD and HACB-established requirements. HQS inspections are required before the Housing Assistance Payments (HAP) Contract is signed and at least annually during the term of the contract.

HUD also requires HACB to determine that units rented by families assisted under the HCV program have rents that are reasonable when compared to comparable unassisted units in the market area.

This chapter explains HUD and HACB requirements related to housing quality and rent reasonableness as follows:

A. Physical Standards. This part discusses the physical standards required of units occupied by HCV-assisted families and identifies decisions about the acceptability of the unit that may be made by the family based upon the family's preference. It also identifies life-threatening conditions that must be addressed on an expedited basis.

B. The Inspection Process. This part describes the types of inspections HACB will make and the steps that will be taken when units do not meet HQS.

C. Rent Reasonableness Determinations. This part discusses the policies HACB will use to make rent reasonableness determinations.

For purposes of Part A and Part B, when HACB obtains the services of an independent agency to perform HQS inspections, the independent agency will be responsible for fulfilling all HACB's responsibilities as prescribed by HUD except enforcing compliance.

A. Physical Standards

1. GENERAL HUD REQUIREMENTS

HUD Performance and Acceptability Standards

HUD's performance and acceptability standards for HCV-assisted housing are provided in 24 CFR 982.401. These standards cover the following areas:

- Sanitary facilities
- Food preparation and refuse disposal
- Space and Security
- Thermal Environment
- Illumination and electricity
- Structure and materials
- Interior Air Quality
- Water Supply
- Lead-based paint
- Access
- Site and neighborhood
- Sanitary condition
- Smoke Detectors

Below is a summary of HUD performance criteria:

Sanitary Facilities

The dwelling unit must include sanitary facilities within the unit. The sanitary facilities must be usable in privacy and must be in proper operating condition and adequate for personal cleanliness and disposal of human waste.

Food Preparation and Refuse Disposal

The dwelling unit must have space and equipment suitable for the family to store, prepare, and serve food in a sanitary manner.

Space and Security

The dwelling unit must provide adequate space and security for the family. This includes having at least one bedroom or living/sleeping room for each two persons.

Thermal Environment

The unit must have a safe system for heating the dwelling unit. Air conditioning is not required but if provided must be in proper operating condition. The dwelling unit must not contain unvented room heaters that burn gas, oil, or kerosene. Portable electric room heaters or kitchen stoves with built-in heating units are not acceptable as a primary source of heat for units located in climatic areas where permanent heat systems are required.

Illumination and Electricity

Each room must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of occupants. The dwelling unit must have sufficient electrical sources so occupants can use essential electrical appliances. Minimum standards are set for different types of rooms. Once the minimum standards are met, the number, type and location of electrical sources are a matter of tenant preference.

Structure and Materials

The dwelling unit must be structurally sound. Handrails are required when four or more steps (risers) are present, and protective railings are required when porches, balconies, and stoops are thirty inches or more off the ground. The elevator servicing the unit must be working [if there is one]. Manufactured homes must have proper tie-down devices capable of surviving wind loads common to the area.

Interior Air Quality

The dwelling unit must be free of air pollutant levels that threaten the occupants' health. There must be adequate air circulation in the dwelling unit. Bathroom areas must have one operable window or other adequate ventilation. Any sleeping room must have at least one window. If a window was designed to be opened, it must be in proper working order.

Water Supply

The dwelling unit must be served by an approved public or private water supply that is sanitary and free from contamination. Plumbing fixtures and pipes must be free of leaks and threats to health and safety.

Lead-Based Paint

Lead-based paint requirements apply to dwelling units built prior to 1978 that are occupied or can be occupied by families with children under six years of age, excluding zero bedroom dwellings. Owners must:

- Disclose known lead-based paint hazards to prospective tenants before the lease is signed,
- Provide all prospective families with "Protect Your Family from Lead in Your Home",
- Stabilize deteriorated painted surfaces and conduct hazard reduction activities when identified by HACB
- Notify tenants each time such an activity is performed
- Conduct all work in accordance with HUD safe practices
- As part of ongoing maintenance ask each family to report deteriorated paint.

For units occupied by environmental intervention blood lead level (lead poisoned) children under six years of age, a risk assessment must be conducted (paid for by HACB). If lead hazards are identified during the risk assessment, the owner must complete hazard reduction activities.

See HCV GB p. 10-15 for a detailed description of these requirements. For additional information on lead-based paint requirements see 24 CFR 35, Subparts A, B, M, and R.

Access

Use and maintenance of the unit must be possible without unauthorized use of other private properties. The building must provide an alternate means of exit in case of fire.

Site and Neighborhood

The site and neighborhood must be reasonably free from disturbing noises and reverberations, excessive trash or vermin, or other dangers to the health, safety, and general welfare of the occupants.

Sanitary Condition

The dwelling unit and its equipment must be in sanitary condition and free of vermin and rodent infestation. The unit must have adequate barriers to prevent infestation.

Smoke Detectors

Smoke detectors must be installed in accordance with and meet the requirements of the National Fire Protection Association Standard (NFPA) 74 (or its successor standards). If the dwelling unit is occupied by any person with a hearing impairment, smoke detectors must have an appropriate alarm system as specified in NFPA 74 (or successor standards).

Hazards and Health/Safety

The unit, interior and exterior common areas accessible to the family, the site, and the surrounding neighborhood must be free of hazards to the family's health and safety.

Additional guidance on these requirements is found in the following HUD resources:

- Housing Choice Voucher Guidebook.
- HUD Housing Inspection Manual for Section 8 Housing
- HUD Inspection Form, form HUD-52580 (3/01) and Inspection Checklist, form HUD-52580-A (9/00)
- HUD Notice 2003-31, Accessibility Notice: Section 504 of the Rehabilitation Act of 1973; the Americans with Disabilities Act of 1990; the Architectural Barriers Act of 1968 and the Fair Housing Act of 1988.

Tenant Preference Items

HUD requires HACB to enforce minimum HQS but also requires that certain judgments about acceptability be left to the family. For example, HACB must ensure that the unit contains the required sanitary facilities, but the family decides whether the cosmetic condition of the facilities is acceptable. Below is a summary of those items that are considered tenant preferences:

Provided the minimum housing quality standards have been met, HUD permits the family to determine whether the unit is acceptable with regard to the following characteristics.

Sanitary Facilities. The family may determine the adequacy of the cosmetic condition and quality of the sanitary facilities, including the size of the lavatory, tub, or shower; the location of the sanitary facilities within the unit; and the adequacy of the water heater.

Food Preparation and Refuse Disposal. The family selects size and type of equipment it finds acceptable. When the family is responsible for supplying cooking appliances, the family may choose to use a microwave oven in place of a conventional oven, stove, or range. When the owner is responsible for providing cooking appliances, the owner may offer a microwave oven in place of an oven, stove, or range only if other subsidized and unsubsidized units on the premises are furnished with microwave ovens only. The adequacy of the amount and type of storage space, the cosmetic conditions of all equipment, and the size and location of the kitchen are all determined by the family.

Space and Security. The family may determine the adequacy of room sizes and room locations. The family is also responsible for deciding the acceptability of the type of door and window locks.

Energy conservation items. The family may determine whether the amount of insulation, presence of absence of storm doors and windows and other energy conservation items are acceptable.

Illumination and Electricity. The family may determine whether the location and the number of outlets and fixtures (over and above those required to meet HQS standards) are acceptable or if the amount of electrical service is adequate for the use of appliances, computers, or stereo equipment.

Structure and Materials. Families may determine whether minor defects, such as lack of paint, or worn flooring or carpeting will affect the livability of the unit.

Indoor Air. Families may determine whether window and door screens, filters, fans, or other devices for proper ventilation are adequate to meet the family's needs. However, if screens are present they must be in good condition.

Sanitary Conditions. The family determines whether the sanitary conditions in the unit, including minor infestations, are acceptable.

Neighborhood Conditions. Families may determine whether neighborhood conditions such as the presence of drug activity, commercial enterprises, and convenience to shopping will affect the livability of the unit.

Families have no discretion with respect to lead-based paint standards and smoke detectors.

For more detailed information see the following documents:

- Housing Choice Voucher Guidebook.
- HUD Housing Inspection Manual for Section 8 Housing
- HUD Inspection Form, form HUD-52580 and Inspection Checklist, form HUD-52580-A

Modifications to Provide Accessibility

Under the Fair Housing Act of 1988 an owner must not refuse the request of a family that contains a person with a disability to make necessary and reasonable modifications to the unit. Such modifications are at the family's expense. The owner may require restoration of the unit to its original condition if the modification would interfere with the owner or next occupant's full enjoyment of the premises. The owner may not increase a customarily required security deposit. However, the landlord may negotiate a restoration agreement that requires the family to restore the unit and, if necessary to ensure the likelihood of restoration, may require the tenant to pay a reasonable amount into an interest bearing escrow account over a reasonable period of time. The interest in any such account accrues to the benefit of the tenant. The owner may also require reasonable assurances that the quality of the work will be acceptable and that any required building permits will be obtained.[24 CFR 100.203].

Modifications to units to provide access for a person with a disability must meet all applicable HQS requirements and conform to the design, construction, or alteration of facilities contained in the UFAS and the ADA Accessibility Guidelines (ADAAG) [28 CFR 35.151(c)].

Any owner that intends to negotiate a restoration agreement or require an escrow account must submit the agreement(s) to HACB for review.

2. ADDITIONAL LOCAL REQUIREMENTS

All units must also meet the local Housing, Building, Health and Fire codes as set forth by the ordinances of the City of Bridgeport. In cases of inconsistency between the Codes and HQS, the stricter of the two shall prevail.

Efforts will be made at all times to encourage owners to provide housing above HQS minimum standards. HACB will not promote any additional acceptability criterion, which is likely to adversely affect the health or safety of participant families, or severely restrict housing choice.

Thermal Environment [HCV GB p.10-7]

HACB must define a “healthy living environment” for the local climate. This may be done by establishing a temperature that the heating system must be capable of maintaining, that is appropriate for the local climate.

The heating system must be capable of maintaining an interior temperature of 65 degrees Fahrenheit between October 1 and May 1.

Clarifications of HUD Requirements

HACB has adopted the following specific requirements that elaborate on HUD standards:

Walls

In areas where plaster or drywall is sagging, severely cracked, or otherwise damaged, it must be repaired or replaced.

Windows

Window sashes must be in good condition, solid and intact, and properly fitted to the window frame. Damaged or deteriorated sashes must be replaced.

Windows must be weather-stripped as needed to ensure a weather-tight seal.

Window screens must be in good condition (applies only if screens are present).

Doors

All exterior doors must be weather-tight to avoid any air or water infiltration, be lockable, have no holes, have all trim intact, and have a threshold.

All interior doors must have no holes, have all trim intact, and be operable without the use of a key.

Floors

All wood floors must be sanded to a smooth surface and sealed. Any loose or warped boards must be re-secured and made level. If they cannot be leveled, they must be replaced.

All floors must be in a finished state. Raw wood or unsealed concrete is not permitted.

All floors should have some type of baseboard, trim, or sealing for a "finished look." Vinyl baseboard is permitted.

Sinks

All sinks and commode water lines must have shut off valves, unless faucets are wall mounted.

All worn or cracked toilet seats and tank lids must be replaced and toilet tank lid must fit properly.

All sinks must have functioning stoppers.

Security

If window security bars or security screens are present on emergency exit windows, they must be equipped with a quick release system. The owner is responsible for ensuring that the family is instructed on the use of the quick release system.

3. LIFE THREATENING CONDITIONS [24 CFR 982.404(a)]

The following are considered life threatening conditions and are required to be corrected within 24 hours of HACB notification:

- Any condition that jeopardizes the security of the unit
- Major plumbing leaks or flooding, waterlogged ceiling or floor in imminent danger of falling
- Natural or LP gas or fuel oil leaks
- Any electrical problem or condition that could result in shock or fire
- Absence of a working heating system when outside or inside temperatures are below 65 degrees Fahrenheit.
- Utilities not in service, including no running hot water
- Conditions that present the imminent possibility of injury
- Obstacles that prevent safe entrance or exit from the unit
- Absence of a functioning toilet in the unit
- Inoperable smoke detectors

In those cases where there is leaking gas or potential of fire or other threat to public safety, and the responsible party cannot be notified or it is impossible to make the repair, proper authorities will be notified by HACB.

If an owner fails to correct life threatening conditions as required by HACB, the housing assistance payment will be abated and the HAP contract will be terminated. See VII-B-7. If a family fails to correct a family caused life threatening condition as required by HACB, HACB may terminate the family's assistance. See VIII-B.8.

The owner will be required to repair an inoperable smoke detector unless HACB determines that the family has intentionally disconnected it (by removing batteries or other means). In this case, the family will be required to repair the smoke detector within 24 hours.

4. OWNER AND FAMILY RESPONSIBILITIES [24 CFR 982.404]

Family Responsibilities

The family is responsible for correcting the following HQS deficiencies:

- Tenant-paid utilities not in service
- Failure to provide or maintain family-supplied appliances
- Damage to the unit or premises caused by a household member or guest beyond normal wear and tear. "Normal wear and tear" is defined as items which could not be charged against the tenant's security deposit under state law or court practice.

Owner Responsibilities

The owner is responsible for all HQS violations not listed as a family responsibility above, even if the violation is caused by the family's living habits (e.g., vermin infestation). However, if the family's actions constitute a serious or repeated lease violation the owner may take legal action to evict the family.

5. SPECIAL REQUIREMENTS FOR CHILDREN WITH ENVIRONMENTAL INTERVENTION BLOOD LEAD LEVEL [24 CFR 35.1225]

If HACB is notified by a public health department or other medical health care provider, or verifies information from a source other than a public health department or medical health care provider, that a child of less than 6 years of age, living in an HCV-assisted unit has been identified as having an environmental intervention blood lead level, HACB will complete a risk assessment of the dwelling unit. The risk assessment will be completed in accordance with program requirements, and the result of the risk assessment will be immediately provided to the owner of the dwelling unit. **In cases where the public health department has already completed an evaluation of the unit, HACB will make every effort to obtain a copy of this information and forward it to the owner.**

Within 30 days after receiving the risk assessment report from HACB, or the evaluation from the public health department, the owner is required to complete the reduction of identified lead-based paint hazards in accordance with the lead-based paint regulations [24 CFR 35.1325 and 35.1330]. If the owner does not complete the "hazard reduction" as required, the dwelling unit is in violation of HQS and HACB will take action in accordance with policy.

6. VIOLATION OF HQS SPACE STANDARDS [24 CFR 982.403]

If HACB determines that a unit does not meet the HQS space standards because of an increase in family size or a change in family composition, HACB will issue the family a new voucher, and the family and HACB will try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, HACB will terminate the HAP contract in accordance with its terms.

B. The Inspection Process

1. OVERVIEW [24 CFR 982.405]

Types of Inspections

HACB conducts the following types of inspections as needed. Each type of inspection is discussed in the paragraphs that follow:

- *Initial Inspections.* HACB conducts initial inspections in response to a request from the family to approve a unit for participation in the HCV program. The unit must pass the HQS inspection before the effective date of the HAP Contract.

- Annual inspections.* Units must be inspected within 12 months period to ensure HQS, and
- *When a landlord requests an increase in contract rent for that unit; and/or*
 - *When a landlord submits a Request for Tenancy Approval indicating that there has been a change in bedroom size, utilities or amenities.*
 - *Special Inspections.* A special inspection may be requested by the owner, the family, or a third party as a result of problems identified with a unit between annual inspections.
 - *Quality Control Inspections.* HUD requires that a sample of units be reinspected by a supervisor or other qualified individual to ensure that HQS are being enforced correctly and uniformly by all inspectors.

Inspection of HACB-owned Units refer to [24 CFR 982.352(b)]

Inspection Costs

HACB may not charge the family or owner for unit inspections [24 CFR 982.405(e)].

Notice and Scheduling [24 CFR 982.551(d)].

Both the family and the owner will be given reasonable notice of all inspections. Except in the case of a life threatening emergency, reasonable notice is considered to be not less than 48 hours. Generally inspections will be conducted on business days only. In the case of a life threatening emergency, HACB will give as much notice as possible, given the nature of the emergency.

Attendance at inspections by owner and the family[HCV GB p. 10-27].

When a family occupies the unit at the time of inspection an adult family member or an adult representative of the family must be present for the inspection. The family representative must give the inspector a signed statement by the head of household, spouse or co-head, authorizing the person to represent them during the inspection. The presence of the owner or the owner's representative is encouraged but is not required.

At initial inspection of a vacant unit, HACB will inspect the unit in the presence of the family and the owner or owner's representative. The presence of a family representative is required.

2. INITIAL HQS INSPECTION [24 CFR 982.401(a)] [982.305(b)(2)].

Timing of Initial Inspections

HACB will complete the initial inspection, determine whether the unit satisfies HQS, and notify the owner and the family of the determination within 10 business days of submission of the Request for Tenancy Approval (RFTA). The 10 business -day period will be suspended for any period during which the unit is not available for inspection.

Inspection Results and Re-inspections

If any HQS violations are identified, the owner will be notified of the deficiencies and be given up to 30 days to correct the deficiencies. If requested by the owner, the time frame for correcting the deficiencies may be extended by HACB for good cause.

The owner will be advised to notify HACB once repairs are completed.

If the time period for correcting the deficiencies (or any HACB-approved extension) has elapsed, or the unit fails HQS at the time of the reinspection, HACB will notify the owner and the family that the unit has been rejected and that the family must search for another unit. The owner will be allowed one (1) re-inspection for repair work to be completed. HACB may agree to conduct a second reinspection, for good cause, at the request of the family and owner.

Following a failed reinspection, the family may submit a new Request for Tenancy Approval for the unit if the family has not found another unit by the time the owner completes all repairs and the family continues to wish to live in the unit.

Utilities

All utilities must be in service prior to the effective date of the HAP contract. If the utilities are not in service at the time of inspection, the inspector will notify the tenant or owner (whomever is responsible for the utilities according to the RFTA) to have the utilities turned on. The inspector will schedule a re-inspection.

Appliances

If the family is responsible for supplying the stove and/or refrigerator, HACB will allow the stove and refrigerator to be placed in the unit after the unit has met all other HQS requirements. The family must then certify that the appliances are working and will be in the unit within three (3) business days of the inspection. The required appliances must be in place before the HAP contract is executed by HACB. HACB will execute the HAP contract based upon a certification from the family that the appliances have been installed and are working.

3. ANNUAL HQS INSPECTIONS [24 CFR 982.405(a)]

Scheduling the Inspection

The family and owner are notified of the date and time of the inspection appointment by mail or phone in cases of urgency. If the family is unable to be present, HACB will reschedule the appointment so that the inspection is completed within 10 business days.

The family will be allowed to reschedule one (1) appointment without violating a family obligation. On a re inspection of an annual the tenant or the landlord must be present, a cancellation with not be acceptable. This may cause the unit to go into a failed status and HAP abatement.

If the family misses the rescheduled appointment, HACB will consider the family to have violated its family obligation to make the unit available for inspection. This may result in terminating of the family's assistance in accordance with the policies. HACB will take extenuating circumstances into consideration.

HACB can conduct annual HQS inspections of a representative sample of the project-based voucher units in a project. HQS deficiencies, which cause a unit to fail, must be corrected by the landlord unless it is a fail for which the tenant is responsible.

4. SPECIAL INSPECTIONS [HCV GB p. 10-30]

During a special inspection, HACB generally will inspect only those deficiencies that were reported. However, the inspector will record any additional HQS deficiencies that are observed and will require the responsible party to make the necessary repairs.

5. QUALITY CONTROL INSPECTIONS [24 CFR 982.405(b), HCV GB p. 10-32]

HUD requires HACB supervisor or other qualified person to conduct quality control inspections of a sample of units to ensure that each inspector is conducting accurate and complete inspections and that there is consistency in the application of the HQS.

The unit sample will include only units that have been inspected within the preceding 3 months. The selected sample will include (1) each type of inspection (initial, annual, and special), (2) inspections completed by each inspector, and (3) units from a cross-section of neighborhoods.

6. INSPECTION RESULTS AND REINSPECTIONS FOR UNITS UNDER HAP CONTRACT

Notification of Corrective Actions

The owner and the family will be notified in writing of the results of all inspections. When an inspection identifies HQS deficiencies, HACB will determine (1) whether or not the deficiency is a life threatening condition and (2) whether the family or owner is responsible.

When life threatening conditions are identified, HACB will immediately notify both parties by telephone, regular mail, facsimile, or email. The notice will specify who is responsible for correcting the violation. The corrective actions must be taken within 24 hours of HACB's notice.

When failures that are not life threatening are identified, HACB will send the owner and the family a written notification of the inspection results. The written notice will specify who is responsible for correcting the violation, and the time frame within which the failure must be corrected. If a unit fails an inspection, the HACB shall send a notice of the failed deficiencies within 48 hours to the owner and/or tenant for corrective action to be taken within 30 days of the date of the failed inspection.

The notice will include a re-inspection date within 30 days of the failed inspection date.

HACB shall send notice of a re-inspection date within forty-eight (48) hours of a no entry inspection.

The notice of inspection results will inform the owner that if life threatening conditions are not corrected within 24 hours, and non-life threatening conditions are not corrected within the specified time frame (or any HACB-approved extension), the owner's HAP will be abated in accordance with HACB policy. Likewise, in the case of family caused deficiencies, the notice will inform the family that if corrections are not made within the specified time frame (or any HACB-approved extension, if applicable) the family's assistance will be terminated in accordance with HACB policy.

Extensions [24 CFR 982.404]

For conditions that are life-threatening, HACB cannot grant an extension to the 24 hour corrective action period.

For conditions that are not life-threatening, extensions may be granted in cases where HACB has determined that the owner has made a good faith effort to correct the deficiencies and is unable to for reasons beyond the owner's control. Reasons may include, but are not limited to:

- A repair cannot be completed because required parts or services are not available.
- A repair cannot be completed because of weather conditions.
- A reasonable accommodation is needed because the family includes a person with disabilities.

The length of the extension will be determined on a case by case basis, but will not exceed 60 days, except in the case of delays caused by weather conditions. In the case of weather conditions, extensions may be continued until the weather has improved sufficiently to make repairs possible. The necessary repairs must be made within 15 days, once the weather conditions have subsided.

Re-inspections

The family and owner will be given a reasonable notice of the reinspection appointment by mail. The re-inspection appointment letter contains a warning of abatement (in the case of owner responsibility) and a list of the unit's deficiencies.

If the deficiencies have not been corrected by the time of the reinspection, HACB will abate the payments and send a Notice of Abatement to the owner, or in the case of family caused violations, a notice of termination to the family, in accordance with HACB policies.

If HACB is unable to gain entry to the unit in order to conduct the scheduled reinspection, HACB will consider the family and owner to have violated its obligation to make the unit available for reinspection. This may result in termination of the family's assistance. The owner Housing Assistance Payment will be abated and may cause termination of the contract.

Rent Increases

Rent increases will not be approved unless all failed items identified by the most recent HQS inspection have been corrected.

7. ENFORCING OWNER COMPLIANCE

If the owner fails to maintain the dwelling unit in accordance with HQS, HACB will take prompt and vigorous action to enforce the owner obligations.

HAP Abatement [24 CFR 985.3(f)]

If a unit fails the re-inspection, the unit will automatically go into abatement.

It is the responsibility of the owner and tenant to ensure entry into unit to conduct reinspection. If inspector is not able to verify that deficiencies were corrected, unit will be abated.

The final inspection shall be automatically scheduled by HACB within 24 hours of a second fail or a second no entry inspection and/or abatement.

There will be no more than three (3) inspections per tenant/landlord in the case of failed inspections and/or abatement.

If an owner fails to correct HQS deficiencies within thirty (30) days, HACB will make all HAP abatements effective the first of the month following the expiration of HACB specified correction period (including any approved extension).

No retroactive payments will be made to the owner for the period of time the rent was abated.

Owner rents are not abated as a result of HQS deficiencies that are the family's responsibility.

HACB will inspect abated units within thirty days (30) days of the second fail or second no inspection and/or abatement. If new deficiencies are cited during the final inspection, the abatement order will remain in effect.

If new deficiencies are cited during the final inspection, the abatement order will remain in effect.

Payment will resume effective on the day the unit passes inspection.

During any abatement period the family continues to be responsible for its share of the rent. The owner must not seek payment from the family for abated amounts and may not use the abatement as cause for eviction.

HAP Contract Termination [HCV GB p. 10-29]

If the owner is responsible for repairs, and fails to correct all the deficiencies cited prior to the date specified by HACB, the owner will be sent a Notice of Abatement which will include the HAP Contract termination date. Prior to the effective date of the termination, the abatement will remain in effect.

However, if the owner completes the corrections and notifies HACB before the termination date of the HAP contract, HACB may rescind the termination notice if (1) the family still resides in the unit and wishes to remain in the unit and (2) the unit passes inspection.

In order to have the unit re-inspected after the Notice of Abatement has been issued; the owner must complete a Final Inspection Request Form.

The form must be received by HACB, via mail or fax, no later than 10 business days from the date of the Notice.

Only one (1) Housing Quality Standards inspection will be conducted once the Final Inspection Request form has been submitted to HACB.

Reasonable notice of HAP contract termination by HACB is 30 days.

8. ENFORCING FAMILY COMPLIANCE WITH HQS [24 CFR 982.404(b)]

Families are responsible for correcting any HQS violations listed in paragraph 8.I.D. If the family fails to correct a violation within the period allowed by HACB (and any extensions), HACB will terminate the family's assistance according to the policies.

If the owner carries out a repair for which the family is responsible under the lease, the owner may bill the family for the cost of the repair.

C. Rent Reasonableness [24 CFR 982.507]

OVERVIEW

No HAP contract can be approved until HACB has determined that the rent for the unit is reasonable. The purpose of the rent reasonableness test is to ensure that a fair rent is paid for each unit rented under the HCV program.

HUD regulations define a reasonable rent as one that does not exceed the rent charged for comparable, unassisted units in the same market area. HUD also requires that owners not charge more for assisted units than for comparable units on the premises. This part explains the method used to determine whether a unit's rent is reasonable.

HACB-owned Units refer to [24 CFR 982.352(b)]

WHEN RENT REASONABLENESS DETERMINATIONS ARE REQUIRED

Owner-initiated Rent Determinations

HACB will make a rent reasonableness determination at initial occupancy and whenever the owner requests a rent adjustment.

The owner and family first negotiate the rent for a unit. HACB will assist the family with the negotiations upon request. At initial occupancy HACB must determine whether the proposed rent is reasonable before HAP Contract is signed. The owner must not change the rent during the initial lease term. Subsequent requests for rent adjustments must be consistent with the lease between the owner and the family. Rent increases will not be approved unless any failed items identified by the most recent HQS inspection have been corrected.

After the initial occupancy period, the owner may request a rent adjustment in accordance with the owner's lease. For rent increase requests after initial lease-up, HACB may request owners to provide information about the rents charged for other units on the premises, if the premises include more than 4 units. In evaluating the proposed rents in comparison to other units on the premises HACB will consider unit size and length of tenancy in the other units.

All rents adjustments will be effective the first of the month following 60 days after HACB's receipt of the owner's request or on the date specified by the owner, whichever is later.

HACB- and HUD-Initiated Rent Reasonableness Determinations

HUD requires HACB to make a determination of rent reasonableness (even if the owner has not requested a change) if there is a 5 percent decrease in the Fair Market Rent that goes into effect at least 60 days before the contract anniversary date. HUD also may direct HACB to make a determination at any other time.

In addition to the instances described above, HACB will make a determination of rent reasonableness at any time after the initial occupancy period if: (1) HACB determines that the initial rent reasonableness determination was in error or (2) HACB determines that the information provided by the owner about the unit or other units on the same premises was incorrect.

HOW COMPARABILITY IS ESTABLISHED

Factors to Consider

HUD requires HACB to take into consideration the factors listed below when determining rent comparability. HACB will use these factors to make upward or downward adjustments to the rents of comparison units when the units are not identical to the HCV-assisted unit.

- Location and age
- Unit size including the number of rooms and square footage of rooms

- The type of unit including construction type (e.g., single family, duplex, garden, low-rise, high-rise)
- The quality of the units including the quality of the original construction, maintenance and improvements made.
- Amenities, services, and utilities included in the rent

Units that Must Not be Used as Comparables

Comparable units must represent unrestricted market rents. Therefore, units that receive some form of federal, state, or local assistance that imposes rent restrictions cannot be considered comparable units. These include units assisted by HUD through any of the following programs: Section 8 project-based assistance, Section 236 and Section 221(d)(3) Below Market Interest Rate (BMIR) projects, HOME or Community Development Block Grant (CDBG) program-assisted units in which the rents are subsidized; units subsidized through federal, state, or local tax credits; units subsidized by the Department of Agriculture rural housing programs, and units that are rent-controlled by local ordinance.

Rents Charged for Other Units on the Premises

The Request for Tenancy Approval (HUD-52517) requires owners to provide information, on the form itself, about the rent charged for other unassisted comparable units on the premises if the premises include more than 4 units.

By accepting HACB payment each month the owner certifies that the rent is not more than the rent charged for comparable unassisted units on the premises. If asked to do so, the owner must give HACB information regarding rents charged for other units on the premises.

4. HACB RENT REASONABLENESS METHODOLOGY

HACB will notify the owner of the rent HACB can approve based upon its analysis of rents for comparable units. The owner may submit information about other comparable units in the market area. HACB will confirm the accuracy of the information provided and consider this additional information when making rent determinations. The owner must submit any additional information within 10 business days of HACB's request for information or the owner's request to submit information.

X. Special Housing Types

Introduction

Families will only be permitted to use the following special housing types: single room occupancy (SRO) cooperative housing, manufactured homes where the family owns the home and leases the space, and homeownership, unless use is needed as a reasonable accommodation so that the program is readily accessible to a person with disabilities.

Families will not be permitted to use any special housing types, unless use is needed as a reasonable accommodation so that the program is readily accessible to a person with disabilities.

Special housing types include single room occupancy (SRO), congregate housing, group homes, shared housing, cooperative housing, manufactured homes where the family owns the home and leases the space, and homeownership [24 CFR 982.601].

A. Single Room Occupancy [24 CFR 982.602 through 982.605]

1. Overview

A single room occupancy (SRO) unit provides living and sleeping space for the exclusive use of the occupant but requires the occupant to share sanitary and/or food preparation facilities with others. More than one person may not occupy an SRO unit. HCV regulations do not limit the number of units in an SRO facility, but the size of a facility may be limited by local ordinances.

When providing HCV assistance in an SRO unit, a separate lease and HAP contract are executed for each assisted person, and the standard form of the HAP contract is used.

2. PAYMENT STANDARD, UTILITY ALLOWANCE, AND HAP CALCULATION

The payment standard for SRO housing is 75 percent of the 0-bedroom payment standard amount on HACB's payment standard schedule.

The utility allowance for an assisted person residing in SRO housing is 75 percent of the zero bedroom utility allowance.

The HAP for an assisted occupant in an SRO facility is the lower of the SRO payment standard amount minus the TTP or the gross rent for the unit minus the TTP.

3. HOUSING QUALITY STANDARDS (HQS)

HQS requirements apply to SRO housing except as modified below.

- **Access:** Access doors to the SRO unit must have working locks for privacy. The occupant must be able to access the unit without going through any other unit. Each unit must have immediate access to two or more approved means of exit from the building, appropriately marked and leading to safe and open space at ground level. The SRO unit must also have any other means of exit required by State or local law.
- **Fire Safety:** All SRO facilities must have a sprinkler system that protects major spaces. “Major spaces” are defined as hallways, common areas, and any other areas specified in local fire, building, or safety codes. SROs must also have hard-wired smoke detectors, and any other fire and safety equipment required by state or local law.

Sanitary facilities and space and security standards must meet local code requirements for SRO housing. In the absence of local code standards the requirements discussed below apply [24 CFR 982.605].

- **Sanitary Facilities:** At least one flush toilet that can be used in privacy, a lavatory basin, and a bathtub or shower in proper operating condition must be provided for each six persons (or fewer) residing in the SRO facility. If the SRO units are leased only to men, flush urinals may be substituted for up to one half of the required number of toilets. Sanitary facilities must be reasonably accessible from a common hall or passageway, and may not be located more than one floor above or below the SRO unit. They may not be located below grade unless the SRO units are located on that level.
- **Space and Security:** An SRO unit must contain at least 110 square feet of floor space, and at least four square feet of closet space with an unobstructed height of at least five feet, for use by the occupant. If the closet space is less than four square feet, the habitable floor space in the SRO unit must be increased by the amount of the deficiency. Exterior doors and windows accessible from outside the SRO unit must be lockable.

Because no children live in SRO housing, the housing quality standards applicable to lead-based paint do not apply.

B. Cooperative Housing [24 CFR 982.619]

1. Overview

This part applies to rental assistance for a cooperative member residing in cooperative housing. It does not apply to assistance for a cooperative member who has purchased membership under the HCV homeownership option, or to rental assistance for a family that leases a cooperative housing unit from a cooperative member.

A cooperative is a form of ownership (nonprofit corporation or association) in which the residents purchase memberships in the ownership entity. Rather than being charged “rent” a cooperative member is charged a “carrying charge.”

When providing HCV assistance in cooperative housing, the standard form of the HAP contract is used.

HACB will approve a family living in cooperative housing if it is determined that assistance under the program will help maintain affordability of the cooperative unit for low-income families. HACB will not approve assistance for a family in cooperative housing until HACB has also determined that the cooperative has adopted requirements to maintain continued affordability for low-income families after transfer of a cooperative member's interest in a cooperative unit (such as a sale of the resident's share in a cooperative corporation).

The reasonable rent in cooperative housing is determined in accordance with "Owner Rents, Rent Reasonableness, and Payment Standards" policy. For cooperative housing, the rent to owner is the monthly carrying charge under the occupancy agreement/lease between the member and the cooperative.

The carrying charge consists of the amount assessed to the member by the cooperative for occupancy of the housing. It includes the member's share of the cooperative's debt service, operating expenses, and necessary payments to cooperative reserve funds. However, the carrying charge does not include down payments or other payments to purchase the cooperative unit, or to amortize a loan to the family for this purpose. Gross rent is the carrying charge plus any utility.

For a cooperative, rent adjustments are applied to the carrying charge as determined in "Owner Rents, Rent Reasonableness, and Payment Standards" policy.

The lease and other appropriate documents will stipulate that the monthly carrying charge is subject to Section 8 limitations on rent to owner. The housing assistance payment will be determined in accordance with the guidelines in "Owner Rents, Rent Reasonableness, and Payment Standards" policy.

HACB may approve a live-in aide to reside with the family to care for a person with disabilities. HACB will approve a live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities. If HACB approves a live-in aide, the live-in aide will be counted when determining the family unit size.

2. PAYMENT STANDARD, UTILITY ALLOWANCE AND HAP CALCULATION

The payment standard and utility allowance are determined according to regular HCV program requirements.

The HAP for a cooperative housing unit is the lower of the payment standard minus the TTP or the monthly carrying charge for the unit, plus any utility allowance, minus the TTP. The monthly carrying charge includes the member's share of the cooperative debt service, operating expenses, and necessary payments to cooperative reserve funds. The carrying charge does not include down payments or other payments to purchase the cooperative unit or to amortize a loan made to the family for this purpose.

3. HOUSING QUALITY STANDARDS

All standard HQS requirements apply to cooperative housing units. There are no additional HQS requirements.

XI. General Leasing Policies

INTRODUCTION

This chapter covers the lease-up process from the family's submission of a Request for Tenancy Approval to execution of the HAP contract.

In order for HACB to assist a family in a particular dwelling unit, or execute a Housing Assistance Payments (HAP) contract with the owner of a dwelling unit, HACB must determine that all the following program requirements are met:

- The unit itself must qualify as an eligible unit [24 CFR 982.305(a)]
- The unit must be inspected by HACB and meet the Housing Quality Standards (HQS) [24 CFR 982.305(a)]
- The lease offered by the owner must be approvable and must include the required Tenancy Addendum [24 CFR 982.305(a)]
- The rent to be charged by the owner for the unit must be reasonable [24 CFR 982.305(a)]
- The owner must be an eligible owner, approvable by HACB, with no conflicts of interest [24 CFR 982.306]
- For families initially leasing a unit only: Where the gross rent of the unit exceeds the applicable payment standard for the family, the share of rent to be paid by the family cannot exceed 40 percent of the family's monthly adjusted income [24 CFR 982.305(a)]

A. TENANT SCREENING [24 CFR 982.307]

HACB will not screen applicants for family behavior or suitability for tenancy

The owner is responsible for screening and selection of the family to occupy the owner's unit. At or before HACB approval of the tenancy, HACB will inform the owner that screening and selection for tenancy is the responsibility of the owner [24 CFR 982.307(a)(2)].

HACB will inform owners that it is the responsibility of the landlord to determine the suitability of prospective tenants. Owners will be encouraged to screen applicants for rent payment history, payment of utility bills, eviction history, respecting the rights of other residents, damage to units, drug-related criminal activity or other criminal activity that is a threat to the health, safety or property of others, and compliance with other essential conditions of tenancy.

A statement of HACB's policy on release of information to prospective landlords will be included in the briefing packet that is provided to the family.

HACB will provide the owner with the family's current and prior address (as shown in HACB records); and the name and address (if known to HACB) of the landlord at the family's current and prior address. [24 CFR 982.307 (b)(1)].

The information will be provided in writing.

HACB will make an exception to this requirement if the family's whereabouts must be protected due to domestic abuse or witness protection.

B. REQUEST FOR TENANCY APPROVAL [Form HUD-52517]

After the family is issued a voucher, the family must locate an eligible unit, with an owner or landlord willing to participate in the voucher program. Once a family finds a suitable unit and the owner is willing to lease the unit under the program, the owner and the family must request HACB to approve the assisted tenancy in the selected unit.

The owner and the family must submit the following documents to HACB:

- Completed Request for Tenancy Approval (RFTA) – Form HUD-52517
- Copy of the proposed lease, including the HUD-prescribed Tenancy Addendum – Form HUD-52641-A
- The Owner's W-9 form providing his or her taxpayer identification number
- ****Documentation from the Office of the Tax Collector of the applicable municipality.

The RFTA contains important information about the rental unit selected by the family, including the unit address, number of bedrooms, structure type, year constructed, utilities included in the rent, and the requested beginning date of the lease, necessary for HACB to determine whether to approve the assisted tenancy in this unit.

Owners must certify to the most recent amount of rent charged for the unit and provide an explanation for any difference between the prior rent and the proposed rent.

Owners must certify that they are not the parent, step parent, child, step child, grandparent, grandchild, sister, step sister, brother or step brother of any member of the family, unless HACB has granted a request for reasonable accommodation for a person with disabilities who is a member of the tenant household.

For units constructed prior to 1978, owners must either 1) certify that the unit, common areas, and exterior have been found to be free of lead-based paint by a certified inspector; or 2) attach a lead-based paint disclosure statement.

Both the RFTA and the proposed lease must be submitted no later than the expiration date stated on the voucher. [HCV GB p.8-15].

The RFTA must be signed by both the family and the owner.

Completed RFTA (including the proposed dwelling lease) must be submitted as hard copies, in-person.

The family may not submit, and HACB will not process, more than one (1) RFTA at a time.

When the family submits the RFTA HACB will review the RFTA for completeness.

If the RFTA is incomplete (including lack of signature by family, owner, or both), or if the dwelling lease is not submitted with the RFTA, HACB will notify the family and/or the owner of the deficiencies.

Missing information and/or missing documents will only be accepted as hard copies, in-person, by mail, or by fax. HACB will not accept missing information over the phone.

When the family submits the RFTA and proposed lease, HACB will also review the terms of the RFTA for consistency with the terms of the proposed lease.

If the terms of the RFTA are not consistent with the terms of the proposed lease, HACB will notify the family and/or the owner of the discrepancies.

Corrections to the terms of the RFTA and/or the proposed lease will only be accepted as hard copies, in-person, by mail or by fax. HACB will not accept corrections by phone.

Because of the time sensitive nature of the tenancy approval process, HACB will attempt to communicate with the owner and family by phone, fax, or email. HACB will use mail when the parties can't be reached by phone, fax, or email.

C. OWNER PARTICIPATION

HACB will not formally approve an owner to participate in the HCV program. However, there are a number of criteria where HACB may deny approval of an assisted tenancy based on past owner behavior, conflict of interest, or other owner-related issues. No owner has a right to participate in the HCV program [24 CFR 982.306(e)]

D. ELIGIBLE UNITS

There are a number of criteria that a dwelling unit must meet in order to be eligible for assistance under the voucher program. Generally, a voucher-holder family may choose any available rental dwelling unit on the market in HACB's jurisdiction. This includes the dwelling unit they are currently occupying. A family can own a rental unit but cannot reside in it while being assisted, except, in the case where the family owns the mobile home and leases the pad.

Ineligible Units [24 CFR 982.352(a)]

HACB may not assist a unit under the voucher program if the unit is a public housing or Indian housing unit; a unit receiving project-based assistance under section 8 of the 1937 Act (42 U.S.C. 1437f); nursing homes, board and care homes, or facilities providing continual psychiatric, medical, or nursing services; college or other school dormitories; units on the grounds of penal, reformatory, medical, mental, and similar public or private institutions; a unit occupied by its owner or by a person with any interest in the unit.

HACB-Owned Units [24 CFR 982.352(b)]

Otherwise eligible units that are owned or substantially controlled by HACB issuing the voucher may also be leased in the voucher program. In order for a HACB-owned unit to be leased under the voucher program, the unit will be ineligible housing and HACB will inform the family, both orally and in writing, that the family has the right to select any eligible unit available for lease and that the family is free to select a HACB-owned unit without any pressure or steering by HACB.

Special Housing Types [24 CFR 982 Subpart M]

HACB will approve any of the following types of housing in the voucher program: single room occupancy (SRO), cooperative housing and homeownership option. HACB will permit the use of any special housing type if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.

Duplicative Assistance [24 CFR 982.352(c)]

A family may not receive the benefit of HCV tenant-based assistance while receiving the benefit of any of the following forms of other housing subsidy, for the same unit or for a different unit:

- Public or Indian housing assistance;
- Other Section 8 assistance (including other tenant-based assistance);
- Assistance under former Section 23 of the United States Housing Act of 1937 (before amendment by the Housing and Community Development Act of 1974);
- Section 101 rent supplements;
- Section 236 rental assistance payments;
- Tenant-based assistance under the HOME Program;
- Rental assistance payments under Section 521 of the Housing Act of 1949 (a program of the Rural Development Administration);
- Any local or State rent subsidy;
- Section 202 supportive housing for the elderly;
- Section 811 supportive housing for persons with disabilities; (11) Section 202 projects for non-elderly persons with disabilities (Section 162 assistance); or
- Any other duplicative federal, State, or local housing subsidy, as determined by HUD. For this purpose, 'housing subsidy' does not include the housing component of a welfare payment, a social security payment received by the family, or a rent reduction because of a tax credit.

Housing Quality Standards (HQS) [24 CFR 982.305 and 24 CFR 982.401]

In order to be eligible, the dwelling unit must be in decent, safe and sanitary condition. This determination is made using HUD's Housing Quality Standards (HQS) and/or equivalent state or local standards approved by HUD.

Unit Size

In order to be eligible, the dwelling unit must be appropriate for the number of persons in the household. A family must be allowed to lease an otherwise acceptable dwelling unit with fewer bedrooms than the number of bedrooms stated on the voucher issued to the family, provided the unit meets the applicable HQS space requirements [24 CFR 982.402(d)]. The family must be allowed to lease an otherwise acceptable dwelling unit with more bedrooms than the number of bedrooms stated on the voucher issued to the family.

Rent Reasonableness [24 CFR 982.305 and 24 CFR 982.507]

In order to be eligible, the dwelling unit must have a reasonable rent. The rent must be reasonable in relation to comparable unassisted units in the area and must not be in excess of rents charged by the owner for comparable, unassisted units on the premises.

At the family's request, HACB will negotiate with the owner to reduce the rent or include some or all of the utilities in the rent to owner.

If the rent can be approved after negotiations with the owner, HACB will continue processing the Request for Tenancy Approval and lease. If the revised rent involves a change in the provision of utilities, a new Request for Tenancy Approval must be submitted by the owner.

If the owner does not agree on the rent to owner after HACB has tried and failed to negotiate a revised rent, HACB will inform the family and owner that the lease is disapproved.

Rent Burden [24 CFR 982.508]* At the time the PHA approves a tenancy for initial** occupancy of a dwelling unit by a family with tenant-based assistance under the program, and where the gross rent of the unit exceeds the applicable payment standard for the family, the family share must not exceed 40 percent of the family's adjusted monthly income. The determination of adjusted monthly income must be based on verification information received by the PHA no earlier than 60 days before the PHA issues a voucher to the family.

E. LEASE AND TENANCY ADDENDUM

The family and the owner must execute and enter into a written dwelling lease for the assisted unit. This written lease is a contract between the tenant family and the owner; HACB is not a party to this contract.

The tenant must have legal capacity to enter a lease under State and local law. 'Legal capacity' means that the tenant is bound by the terms of the lease and may enforce the terms of the lease against the owner [24 CFR 982.308(a)]

1. Lease Form and Tenancy Addendum [24 CFR 982.308]

If the owner uses a standard lease form for rental to unassisted tenants in the locality or the premises, the lease must be in such standard form. If the owner does not use a standard lease form for rental to unassisted tenants, the owner may use another form of lease. The HAP contract prescribed by HUD contains the owner's certification that if the owner uses a standard lease form for rental to unassisted tenants, the lease is in such standard form.

All provisions in the HUD-required Tenancy Addendum must also be added word-for-word to the owner's standard lease form, for use with the assisted family. The Tenancy Addendum includes the tenancy requirements for the program and the composition of the household as approved by HACB. As a part of the lease, the tenant shall have the right to enforce the Tenancy Addendum against the owner and the terms of the Tenancy Addendum shall prevail over any other provisions of the lease.

HACB does provide a model or standard dwelling lease for owners to use in the HCV program.

2. Lease Information [24 CFR 982.308(d)]

The assisted dwelling lease must contain all of the required information as listed below:

- The names of the owner and the tenant:
- The unit rented (address, apartment number, and any other information needed to identify the contract unit)
- The term of the lease (initial term and any provisions for renewal)
- The amount of the monthly rent to owner
- A specification of what utilities and appliances are to be supplied by the owner, and what utilities and appliances are to be supplied by the family

3. Term of Assisted Tenancy

HACB will not approve an initial lease term of less than one (1) year.

During the initial term of the lease, the owner may not raise the rent to owner [24 CFR 982.309].

Provisions for renewal of the dwelling lease must be stated in the dwelling lease [HCV Guidebook, pg. 8-22].

HACB may exercise its right to not execute the HAP contract even if there is less than one year remaining from the beginning of the initial lease term to the end of the last expiring funding increment under the consolidated ACC. [24 CFR 982.309(b)].

Security Deposit [24 CFR 982.313 (a) and (b)]

The owner may collect a security deposit from the tenant. HACB may prohibit security deposits in excess of the private market practice, or in excess of amounts charged by the owner to unassisted tenants. **HACB will allow the owner to collect a security deposit that is permissible under state law.**

HACB Review of Lease

HACB will review the dwelling lease for compliance with all applicable requirements.

If the dwelling lease is incomplete or incorrect, HACB will notify the family and/or the owner of the deficiencies. Missing and corrected lease information will only be accepted as hard copies, in-person, by mail, or by fax. HACB will not accept missing and corrected information over the phone

Because the initial leasing process is time-sensitive, HACB will attempt to communicate with the owner and family by phone, fax, or email. HACB will use mail when the parties can't be reached by phone, fax, or email.

If it is determined that the lease does not comply with state/local law, HACB will exercise the right not to approve the tenancy.

F. TENANCY APPROVAL [24 CFR 982.305]

After receiving the family's Request for Tenancy Approval, including the proposed dwelling lease and all other required documents, HACB will promptly notify the family and owner whether the assisted tenancy is approved.

Prior to approving the assisted tenancy and execution of a HAP contract, HACB will ensure that all required actions and determinations, discussed in Part I of this chapter have been completed.

These actions include ensuring that the unit is eligible; the unit has been inspected by HACB and meets the Housing Quality Standards (HQS); the lease offered by the owner is approvable and includes the required Tenancy Addendum; the rent to be charged by the owner for the unit must be reasonable; where the family is initially leasing a unit and the gross rent of the unit exceeds the applicable payment standard for the family, the share of rent to be paid by the family does not exceed 40 percent of the family's monthly adjusted income [24 CFR 982.305(a)]; the owner is an eligible owner, not disapproved by HACB, with no conflicts of interest [24 CFR 982.306]; the family and the owner have executed the lease, including the Tenancy Addendum, and the lead-based paint disclosure information [24 CFR 982.305(b)].

If the terms of the RFTA/proposed lease are changed for any reason, including but not limited to negotiation with HACB, HACB will obtain corrected copies of the RFTA and proposed lease, signed by the family and the owner.

Corrections to the RFTA/proposed lease will only be accepted as hard copies, in-person, by mail, or by fax. HACB will not accept corrections over the phone.

If HACB determines that the tenancy cannot be approved for any reason, the owner and the family will be notified in writing and given the opportunity to address any reasons for disapproval. HACB will instruct the owner and family of the steps that are necessary to approve the tenancy.

Where the tenancy is not approvable because the unit is not approvable, the family must continue to search for eligible housing within the timeframe of the issued voucher.

If the tenancy is not approvable due to rent affordability (including rent burden and rent reasonableness), HACB will attempt to negotiate the rent with the owner. If a new, approvable rent is negotiated, the tenancy will be approved. If the owner is not willing to negotiate an approvable rent, the family must continue to search for eligible housing within the timeframe of the issued voucher.

CHANGE IN TOTAL TENANT PAYMENT (TTP) PRIOR TO HAP EFFECTIVE DATE

When the family reports changes in factors that will affect the total family share prior to the effective date of the HAP contract at admission, the information will be verified and the total family share will be recalculated. If the family does not report any change, HACB need not obtain new verifications before signing the HAP contract, even if verifications are more than 60 days old.

G. HAP CONTRACT EXECUTION [24 CFR 982.305]

The HAP contract is a written agreement between HACB and the owner of the dwelling unit occupied by a housing choice voucher assisted family. Under the HAP contract, HACB agrees to make housing assistance payments to the owner on behalf of a specific family occupying a specific unit and obliges the owner to comply with all program requirements.

The HAP contract format is prescribed by HUD.

If HACB has given approval for the family of the assisted tenancy, the owner and HACB execute the HAP contract.

The term of the HAP contract will be the same as the term of the lease [24 CFR 982.451(a)(2)].

The family and the owner will execute the lease agreement, and the owner and HACB will execute the HAP contract. Copies of the documents will be furnished to the parties who signed the respective documents. HACB will retain a copy of all signed documents.

HACB will make every effort to ensure that the HAP contract is executed before the beginning of the lease term. Regardless, the HAP contract must be executed no later than 60 days from the beginning of the lease term.

HACB will not pay any housing assistance payment to the owner until the HAP contract has been executed. If the HAP contract is executed during the period of 60 days from the beginning of the lease term, HACB will pay housing assistance payments after execution of the HAP contract (in accordance with the terms of the HAP contract), to cover the portion of the lease term before execution of the HAP contract (a maximum of 60 days).

Any HAP contract executed after the 60 day period is void, and the PHA may not pay any housing assistance payment to the owner. [24 CFR, Part 982.301] (c)(4).

Any HAP contract executed after the 60 day period is void, and HACB may not pay any housing assistance payment to the owner.

Owners whose mailing address is a Post Office Box must provide the current address of their residence. If families lease properties owned by relatives, the owner's current address will be compared to the subsidized unit's address.

Both the Owner(s) and the Management Agent, if any, must provide their respective employer identification numbers or social security numbers and their driver's licenses or other photo identifications, which is to be copied by HACB.

Owners must also submit proof of ownership of the property, which shall include the title deed and tax clearance form. In the case of a property owned by a partnership, limited partnership, corporation, limited liability corporation or any other ownership entity, the representative or principal of such ownership entity shall provide a copy of the organizational documents, including but not limited to the certificate of incorporation and certificate of good standing issued by the Office of the Secretary of State of the State of Connecticut.

In the case of a property managed by a Real Estate Management Company, proof of ownership and of good standing shall be required both for the ownership entity and for the management company. In addition, an executed copy of the agreement between the owner and the Management Company or Agent shall be required.

All Housing Assistance Payments will be made out to owner on the deed.

The owner must submit proof that she or he does not owe local city taxes on any real estate. HACB will require a tax clearance form signed by the City of Bridgeport to verify that the owner does not owe taxes.

The owner must submit an IRS W9 form.

H. CHANGES IN LEASE OR RENT [24 CFR 982.308]

If the tenant and the owner agree to any changes in the lease, such changes must be in writing, and the owner must immediately give HACB a copy of such changes. The lease, including any changes, must remain in accordance with the requirements of this chapter.

Voucher assistance in the unit shall not be continued unless HACB has approved a new tenancy in accordance with program requirements and has executed a new HAP contract with the owner. HACB's approval of tenancy and execution of a new HAP contract is required for changes in the lease under the following circumstances:

- Changes in lease requirements governing tenant or owner responsibilities for utilities or appliances
- Changes in lease provisions governing the term of the lease
- The family moves to a new unit, even if the unit is in the same building or complex

In these cases, if the housing choice voucher assistance is to continue, the family must submit a new Request for Tenancy Approval (RFTA) along with a new dwelling lease containing the altered terms. A new tenancy must then be approved in accordance with this chapter.

Where the owner is changing the amount of rent, the owner must notify HACB of any changes in the amount of the rent to owner at least 60 days before any such changes go into effect [24 CFR 982.308(g)(4)]. HACB will agree to such an increase only if the amount of the rent to owner is considered reasonable according to the rent reasonableness standards discussed in VII. If the requested rent is not found to be reasonable, the owner must either reduce the requested rent increase, or give the family notice in accordance with the terms of the lease.

No rent increase is permitted during the initial term of the lease [24 CFR 982.309(a)(3)]. Rent increases will go into effect on the first of the month following the 60 day period after the owner notifies HACB of the rent change on the family's anniversary date or on the date specified by the owner, whichever is later.

XII. Owners

INTRODUCTION

Owners play a central role in the HCV program by supplying decent, safe, and sanitary housing for participating families.

The term “owner” refers to any person or entity with the legal right to lease or sublease a unit to a participant in the HCV program [24 CFR 982.4(b)]. The term “owner” includes a principal or other interested party [24 CFR 982.453; 24 CFR 982.306(f)], such as a designated agent of the owner.

Owners have numerous responsibilities under the program, including screening and leasing to families, maintaining the dwelling unit, enforcing the lease, and complying with various contractual obligations. However, this chapter is not meant to be an overview of all aspects of owner participation in the HCV program.

The chapter is organized in two parts:

- A: Owners in the HCV Program. This part discusses the role of an owner in HACB’s HCV program and highlights key owner rights and responsibilities.
- B: HAP Contracts. This part explains provisions of the HAP contract and the relationship between HACB and the owner as expressed in the HAP contract.

A. Owners in the HCV Program

1. OWNER RECRUITMENT AND RETENTION [HCV GB, pp. 2-4 to 2-6]

Recruitment

HACB will conduct owner outreach to ensure that owners are familiar with the program and its advantages. HACB will actively recruit property owners with property located outside areas of poverty and minority concentration. These outreach strategies may include:

- Distributing printed material about the program to property owners and managers
- Contacting property owners and managers by phone or in-person
- Holding owner recruitment/information meetings at least once a year
- Participating in community based organizations comprised of private property and apartment owners and managers
- Developing working relationships with owners and real estate brokers associations

Outreach strategies will be monitored for effectiveness, and adapted accordingly.

Retention

All HACB activities that may affect an owner's ability to lease a unit will be processed as rapidly as possible, in order to minimize vacancy losses for owners.

HACB will provide owners with a handbook that explains the program, including HUD and HACB policies and procedures, in easy-to-understand language.

HACB will give special attention to helping new owners succeed through activities such as:

- Providing the owner with a designated HACB contact person.
- Coordinating inspection and leasing activities between HACB, the owner, and the family.
- Providing other written information about how the program operates, including answers to frequently asked questions.

Additional services may be under taken on an as-needed basis, and as resources permit.

2. BASIC HCV PROGRAM REQUIREMENTS

Owners that wish to indicate their willingness to lease a unit to an eligible HCV family or to help the HCV family find a unit must notify HACB. HACB will maintain a listing of such owners and provide this listing to the HCV family as part of the informational briefing packet.

When a family approaches an owner to apply for tenancy, the owner is responsible for screening the family and deciding whether to lease to the family, just as the owner would with any potential tenant. HACB has no liability or responsibility to the owner or other persons for the family's behavior or suitability for tenancy.

If the owner is willing, the family and the owner must jointly complete a Request for Tenancy Approval (RFTA, Form HUD 52517), which constitutes the family's request for assistance in the specified unit, and which documents the owner's willingness to lease to the family and to follow the program's requirements. When submitted to HACB, this document is the first step in the process of obtaining approval for the family to receive the financial assistance it will need in order to occupy the unit. Also submitted with the RFTA is a copy of the owner's proposed dwelling lease, **proof of legal ownership of property, tax clearance form, and Landlord/Tenant relative certification.**

HUD regulations stipulate that an assisted tenancy can be approved only under certain conditions:

- The owner must be qualified to participate in the program [24 CFR 982.306]. Some owners are precluded from participating in the program, or from renting to a particular family, either because of their past history with this or another federal housing program, or because of certain conflicts of interest. Owner qualifications are discussed later in this chapter.

- The selected unit must be of a type that is eligible for the program [24 CFR 982.305(a)]. See eligibility chapter for more detail on unit eligibility policies and process.
- The selected unit must meet HUD's Housing Quality Standards (HQS) and/or equivalent state or local standards approved by HUD [24 CFR 982.305(a)]. HACB will inspect the owner's dwelling unit at various stages of HCV program participation, to ensure that the unit continues to meet HQS requirements.
- HACB must determine that the cost of the unit is reasonable [24 CFR 982.305(a)]. The rent must be reasonable in relation to comparable unassisted units in the area and must not be in excess of rents charged by the owner for comparable, unassisted units on the premises.
- At initial lease-up of a unit, HACB must determine that the share of rent to be paid by the family does not exceed 40 percent of the family's monthly adjusted income [24 CFR 982.305(a)].
- The dwelling lease must comply with all program requirements [24 CFR 982.308]. Owners are encouraged to use their standard leases when renting to an assisted family. However, the HCV program requires that the Tenancy Addendum, which helps standardize the tenancy requirements for all assisted families, be added word-for-word to that lease.
- HACB and the owner enter into a formal contractual relationship by executing the Housing Assistance Payment (HAP) Contract (Form HUD-52641). The HAP contract format is prescribed by HUD.

3. OWNER RESPONSIBILITIES [24 CFR 982.452]

The basic owner responsibilities in the HCV program are outlined in the regulations as follows:

- Performing all of the owner's obligations under the Housing Assistance Payments (HAP) contract and the lease
- Performing all management and rental functions for the assisted unit, including selecting a voucher-holder to lease the unit, and deciding if the family is suitable for tenancy of the unit
- Maintaining the unit in accordance with the Housing Quality Standards (HQS), including performance of ordinary and extraordinary maintenance
- Complying with equal opportunity requirementsPreparing and furnishing to HACB information required under the HAP contract
- Collecting from the family any security deposit, the tenant's contribution to rent (that part of rent to owner not covered by the housing assistance payment from HACB), and any charges for unit damage by the family.
- Enforcing tenant obligations under the dwelling lease
- Paying for utilities and services (unless paid by the family under the lease)
- Making modifications to a dwelling unit occupied or to be occupied by a disabled person [24 CFR 100.203]

4. OWNER QUALIFICATIONS

HACB does not formally approve an owner to participate in the HCV program. However, there are a number of criteria where HACB may deny approval of an assisted tenancy based on past owner behavior, conflict of interest, or other owner-related issues. No owner has a right to participate in the HCV program [24 CFR 982.306(e)].

Owners Barred from Participation [24 CFR 982.306(a) and (b)]

HACB is not permitted to approve the assisted tenancy if HACB has been informed that the owner has been debarred, suspended, or subject to a limited denial of participation under 24 CFR part 24. HUD may direct HACB not to approve a tenancy request if a court or administrative agency has determined that the owner violated the Fair Housing Act or other federal equal opportunity requirements, or if such an action is pending.

Leasing to Relatives [24 CFR 982.306(d), HCV GB p. 11-2]

HACB is not permitted to approve an RFTA if the owner is the parent, child, grandparent, grandchild, sister, or brother of any member of the family. HACB may make an exception as a reasonable accommodation for a family member with a disability. The owner is required to certify that no such relationship exists. This restriction applies at the time that the family receives assistance under the HCV program for occupancy of a particular unit. Current contracts that were previously approved on behalf of owners and families that are related may continue, but any new leases or contracts for these families may not be approved.

Conflict of Interest [24 CFR 982.161; HCV GB p. 8-19]

HACB must not approve a tenancy in which any of the following classes of persons has any interest, direct or indirect, during tenure or for one year thereafter:

- Any present or former member or officer of HACB (except a participant commissioner)
- Any employee of HACB, or any contractor, subcontractor or agent of HACB, who formulates policy or who influences decisions with respect to the programs
- Any public official, member of a governing body, or State or local legislator, who exercises functions or responsibilities with respect to the programs
- Any member of the Congress of the United States

HUD may waive the conflict of interest requirements, except for members of Congress, for good cause. According to regulations, HACB must submit a waiver request to the appropriate HUD Field Office for determination.

Any waiver request submitted by HACB must include [HCV Guidebook pp.11-2 and 11-3]:

- Complete statement of the facts of the case;
- Analysis of the specific conflict of interest provision of the HAP contract and justification as to why the provision should be waived;
- Analysis of and statement of consistency with state and local laws. The local HUD office, HACB, or both parties may conduct this analysis. Where appropriate, an opinion by the state's attorney general should be obtained;

- Opinion by the local HUD office as to whether there would be an appearance of impropriety if the waiver were granted;
- Statement regarding alternative existing housing available for lease under the HCV program or other assisted housing if the waiver is denied;
- If the case involves a hardship for a particular family, statement of the circumstances and discussion of possible alternatives;
- If the case involves a public official or member of the governing body, explanation of his/her duties under state or local law, including reference to any responsibilities involving the HCV program;
- If the case involves employment of a family member by HACB or assistance under the HCV program for an eligible HACB employee, explanation of the responsibilities and duties of the position, including any related to the HCV program;
- If the case involves an investment on the part of a member, officer, or employee of HACB, description of the nature of the investment, including disclosure/divestiture plans.

In considering whether to request a conflict of interest waiver from HUD, HACB will consider factors the reasons for waiving the requirement; consistency with state and local laws; the existence of alternative housing available to families; the individual circumstances of a particular family; the specific duties of individuals whose positions present a possible conflict of interest; the nature of any financial investment in the property and plans for disclosure/divestiture; and the possible appearance of impropriety.

Owner Actions That May Result in Disapproval of a Tenancy Request [24 CFR 982.306(c)]

HUD regulations permit HACB, at HACB's discretion, to refuse to approve a request for tenancy if the owner has committed any of a number of different actions.

If HACB disapproves a request for tenancy because an owner is not qualified, it may not terminate the HAP contract for any assisted families that are already living in the owner's properties unless the owner has violated the HAP contract for those units [HCV GB p. 11-4].

HACB will refuse to approve a request for tenancy if HACB becomes aware that any of the following are true:

- The owner has violated obligations under a HAP contract under Section 8 of the 1937 Act (42 U.S.C. 1437f);
- The owner has committed fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;
- The owner has engaged in any drug-related criminal activity or any violent criminal activity;
- The owner has a history or practice of non-compliance with the HQS for units leased under the tenant-based programs, or with applicable housing standards for units leased with project-based Section 8 assistance or leased under any other federal housing program;

- The owner has a history or practice of failing to terminate tenancy of tenants of units assisted under Section 8 or any other federally assisted housing program for activity engaged in by the tenant, any member of the household, a guest or another person under the control of any member of the household that: (i) Threatens the right to peaceful enjoyment of the premises by other residents; (ii) Threatens the health or safety of other residents, of employees of HACB, or of owner employees or other persons engaged in management of the housing; (iii) Threatens the health or safety of, or the right to peaceful enjoyment of their residences, by persons residing in the immediate vicinity of the premises; or (iv) Is drug-related criminal activity or violent criminal activity;
- The owner has a history or practice of renting units that fail to meet state or local housing codes; or
- The owner has not paid state or local real estate taxes, fines, or assessment.
- In cases where the owner and the tenant bear the same last name, HACB, may at its discretion, require the family and or the owner to certify whether they are related to each other in any way.
- The owner has engaged in or threatened abusive or violent behavior toward HACB personnel.

Legal Ownership of Unit

HACB will only enter into a contractual relationship with the legal owner of a qualified unit. No tenancy will be approved without acceptable documentation of legal ownership (e.g., deed of trust, proof of taxes for most recent year).

5. NON-DISCRIMINATION [HAP Contract – Form HUD-52641]

The owner must not discriminate against any person because of race, color, religion, sex, national origin, age, familial status, or disability, in connection with any actions or responsibilities under the HCV program and the HAP contract with HACB.

The owner must cooperate with HACB and with HUD in conducting any equal opportunity compliance reviews and complaint investigations in connection with the HCV program and the HAP contract with HACB.

HAP Contracts

1. OVERVIEW

The HAP contract represents a written agreement between HACB and the owner of the dwelling unit occupied by a HCV assisted family. The contract spells out the owner's responsibilities under the program, as well as HACB's obligations. Under the HAP contract, HACB agrees to make housing assistance payments to the owner on behalf of a specific family occupying a specific unit.

The HAP contract is used for all HCV program tenancies except for assistance under the Section 8 homeownership program, and assistance to families that own a manufactured home and lease the space.

If HACB has given approval for the family of the assisted tenancy, the owner and HACB execute the HAP contract.

2. HAP CONTRACT CONTENTS

The HAP contract format is required by HUD, specifically Housing Assistance Payment (HAP) Contract, Form HUD-52641.

The HAP contract contains three parts.

Part A of the contract includes basic **contract information** about the name of the tenant family, address of the contract unit, names of all household members, first and last dates of initial lease term, amount of initial monthly rent to owner, amount of initial housing assistance payment, utilities and appliances to be supplied by owner and tenant, signatures of HACB and owner [HCV Guidebook, pp 11-10 and 11-11].

In addition, HACB has the discretion to add language to Part A of the HAP contract that defines when the housing assistance payment by HACB is deemed received by the owner (e.g., upon mailing by HACB or actual receipt by the owner).

HACB has not adopted a policy that defines when the housing assistance payment by HACB is deemed received by the owner. Therefore, no modifications to the HAP contract will be necessary.

Part B is the body of the contract. It describes in detail program requirements affecting the owner and owner roles and responsibilities under the HCV program. Most of the requirements contained in Part B of the HAP contract are outlined elsewhere in this plan. Topics addressed in Part B include:

- Lease of Contract Unit
- Maintenance, Utilities, and Other Services
- Term of HAP Contract
- Provision and Payment of Utilities and Appliances
- Rent to Owner: Reasonable Rent
- PHA Payment to Owner
- Prohibition of Discrimination
- Owner's Breach of HAP Contract
- PHA and HUD Access to Premises and Owner's Records
- Exclusion of Third Party Rights
- Conflict of Interest
- Assignment of the HAP Contract
- Written Notices
- Entire Agreement Interpretation

Part C of the contract includes the Tenancy Addendum (Form HUD-52641-A). The addendum sets forth the tenancy requirements for the program and the composition of the household, as approved by HACB. The owner must sign the HUD Tenancy Addendum with the prospective tenant, and the tenant has the right to enforce the Tenancy Addendum against the owner. The terms of the Tenancy Addendum prevail over any other provisions of the lease.

3. HAP CONTRACT PAYMENTS

General

During the term of the HAP contract, and subject to the provisions of the HAP contract, HACB must make monthly HAP payments to the owner on behalf of the family, at the beginning of each month. If a lease term begins after the first of the month, the HAP payment for the first month is prorated for a partial month.

The amount of the HAP payment is determined according to the policies, and is subject to change during the term of the HAP contract. HACB must notify the owner and the family in writing of any changes in the HAP payment.

HAP payments can be made only during the lease term, and only while the family is residing in the unit.

The monthly HAP payment by HACB is credited toward the monthly rent to owner under the family's lease. The total of the rent paid by the tenant, plus HACB HAP payment, should be equal to the rent specified in the lease (the rent to owner).

The family is not responsible for payment of the HAP payment, and HACB is not responsible for payment of the family share of rent.

The family's share of the rent cannot be more than the difference between the total rent to the owner and the HAP payment. The owner may not demand or accept any rent payment from the tenant in excess of this maximum [24 CFR 982.451(b)(4)]. The owner may not charge the tenant extra amounts for items customarily included in rent in the locality, or provided at no additional cost to unsubsidized tenants in the premises [24 CFR 982.510(c)].

If the owner receives any excess HAP from HACB, the excess amount must be returned immediately. If HACB determines that the owner is not entitled to all or a portion of the HAP, HACB may deduct the amount of overpayment from any amounts due to the owner, including amounts due under any other Section 8 HCV contract.

Once the HAP contract is executed, HACB begins processing payments to the landlord. A HAP Register will be used as a basis for monitoring the accuracy and timeliness of payments. Changes are made automatically to the HAP Register for the following month.

Checks are disbursed by the Finance Department to the owner each month. Checks may not be picked up by owner at HACB. Checks will only be disbursed on the 1st and the 15th of the month. Exceptions may be made with the approval of the Executive Director in cases of hardship

Checks that are not received will not be replaced until a written request has been received from the payee and a stop payment has been put on the check.

Owner Certification of Compliance

Unless the owner complies with all provisions of the HAP contract, the owner is not entitled to receive housing assistance payments under the HAP contract [HAP Contract – Form HUD-52641].

By endorsing the monthly check from HACB, the owner certifies to compliance with the terms of the HAP contract. This includes certification that the owner is maintaining the unit and premises in accordance with HQS; that the contract unit is leased to the tenant family and, to the best of the owner's knowledge, the family resides in the unit as the family's only residence; the rent to owner does not exceed rents charged by the owner for comparable unassisted units on the premises; and that the owner does not receive (other than rent to owner) any additional payments or other consideration for rent of the contract unit during the HAP term.

Late HAP Payments [24 CFR 982.451(a)(5)]

HACB is responsible for making HAP payments promptly when due to the owner, in accordance with the terms of the HAP contract. After the first two calendar months of the HAP contract term, the HAP contract provides for penalties if HACB fails to make the HAP payment on time.

Penalties for late HAP payments can only be imposed if 1) the penalties are in accordance with generally accepted local rental market practices and law governing penalties for late payment by tenants; 2) it is the owner's normal business practice to charge late payment penalties for both assisted and unassisted families; and 3) the owner charges the assisted family for late payment of the family's share of the rent.

HACB is not required to pay a late payment penalty if HUD determines that the payment is late for reasons beyond HACB's control. In addition, late payment penalties are not required if HACB intentionally delays or denies payment as a remedy to an owner breach of the HAP contract [HCV Guidebook p. 11-7].

Proof of "Mailed to" date will be the: Date on the check

Proof of "Received by Owner" will be: five (5) days after date of mailing by HACB

When HACB implements its Automatic Deposit Program, HACB will offer to make automatic monthly HAP deposits into the bank account of the owner. If the owner agrees to such an arrangement with HACB, the date the bank shows as the deposit date will be the official date of record and will be the determining factor in cases involving late payment penalties.

Termination of HAP Payments [24 CFR 982.311(b)]

HACB will continue making housing assistance payments to the owner in accordance with the HAP contract as long as the tenant continues to occupy the unit and the HAP contract is not violated.

HAP payments terminate when the HAP contract terminates or when the tenancy is terminated in accordance with the terms of the lease.

If the owner has initiated eviction proceedings against the family and the family continues to reside in the unit, HACB will continue to make housing assistance payments to the owner until the owner has obtained a court judgment or other process allowing the owner to evict the tenant.

The owner must inform HACB when the owner has initiated eviction proceedings against the family and the family continues to reside in the unit.

The owner must inform HACB when the owner has obtained a court judgment or other process allowing the owner to evict the tenant, and provide HACB with a copy of such judgment or determination.

After the owner has obtained a court judgment or other process allowing the owner to evict the tenant, HACB will continue to make HAP payments to the owner until the family actually moves from the unit or until the family is physically evicted from the unit, whichever is earlier. The owner must inform HACB of the date when the family actually moves from the unit or the family is physically evicted from the unit.

4. BREACH OF HAP CONTRACT [24 CFR 982.453]

Any of the following actions by the owner constitutes a breach of the HAP contract:

- If the owner violates any obligations under the HAP contract including failure to maintain the unit in accordance with HQS
- If the owner has violated any obligation under any other HAP contract under Section 8
- If the owner has committed fraud, bribery or any other corrupt or criminal act in connection with any federal housing program
- For projects with mortgages insured by HUD or loans made by HUD, if the owner has failed to comply with the regulations for the applicable program; or if the owner has committed fraud, bribery or any other corrupt or criminal act in connection with the mortgage or loan
- If the owner has engaged in drug-related criminal activity
- If the owner has committed any violent criminal activity

If HACB determines that a breach of the HAP contract has occurred, it may exercise any of its rights and remedies under the HAP contract.

HACB rights and remedies against the owner under the HAP contract include recovery of any HAP overpayment, suspension of housing assistance payments, abatement or reduction of the housing assistance payment, termination of the payment or termination of the HAP contract. HACB may also obtain additional relief by judicial order or action.

HACB will notify the owner of its determination and provide in writing the reasons for the determination. The notice may require the owner to take corrective action by an established deadline. HACB will provide the owner with written notice of any reduction in housing assistance payments or the termination of the HAP contract.

Before HACB invokes a remedy against an owner, HACB will evaluate all information and documents available to determine if the contract has been breached.

If relevant, HACB will conduct an audit of the owner's records pertaining to the tenancy or unit.

5. HAP CONTRACT TERM AND TERMINATIONS

The term of the HAP contract runs concurrently with the term of the dwelling lease [24 CFR 982.451(a)(2)], beginning on the first day of the initial term of the lease and terminating on the last day of the term of the lease, including any lease term extensions.

The HAP contract and the housing assistance payments made under the HAP contract terminate if [HCV Guidebook pp.11-4 and 11-5, pg. 15-3]:

- The owner or the family terminates the lease;
- The lease expires;
- HACB terminates the HAP contract;
- HACB terminates assistance for the family;
- The family moves from the assisted unit. In this situation, the owner is entitled to keep the housing assistance payment for the month when the family moves out of the unit.
- 180 days have lapsed since HACB made the last housing assistance payment to the owner;
- The family is absent from the unit for longer than the maximum period permitted by HACB;
- The Annual Contributions Contract (ACC) between HACB and HUD expires
- HACB elects to terminate the HAP contract.

HACB may elect to terminate the HAP contract in each of the following situations:

- Available program funding is not sufficient to support continued assistance for families in the program [24 CFR 982.454];
- The unit does not meet HQS size requirements due to change in family composition [24 CFR 982.403]
- The unit does not meet HQS [24 CFR 982.404];
- The family breaks up [HUD Form 52641]
- The owner breaches the HAP contract [24 CFR 982.453(b)]

If HACB terminates the HAP contract, HACB will give the owner and the family written notice. The notice will specify the reasons for the termination and the effective date of the termination. [HCV Guidebook pg.15-4].

In all cases, the HAP contract terminates at the end of the calendar month that follows the calendar month in which HACB gives written notice to the owner. The owner is not entitled to any housing assistance payment after this period, and must return to HACB any housing assistance payment received after this period.

If the family moves from the assisted unit into a new unit, even if the new unit is in the same building or complex as the assisted unit, the HAP contract for the assisted unit terminates. A new HAP contract would be required [HCV GB, p. 11-17].

When the family moves from an assisted unit into a new unit, the term of the HAP contract for the new unit may begin in the same month in which the family moves out of its old unit. This is not considered a duplicative subsidy [HCV GB, p. 8-22].

6. CHANGE IN OWNERSHIP/ASSIGNMENT OF THE HAP CONTRACT [HUD-52641]

The HAP contract cannot be assigned to a new owner without the prior written consent of HACB.

An owner under a HAP contract must notify HACB in writing prior to a change in the legal ownership of the unit. The owner must supply all information as requested by HACB.

A change in ownership does not require execution of a new contract and lease.

HACB will process a change of ownership only upon the written request of the new owner; provided the new owner notifies HACB of the change in ownership within 30 days of transfer of ownership. Failure to notify HACB within 60 days shall result in HACB not approving the transfer of the HAP contract. Any HAP Contract executed after the 60 day period is void, and the PHA may not pay any housing assistance to the owner. [24 CFR, Part 982.306] (C) (4).

Prior to approval of assignment to a new owner, the new owner must agree to be bound by and comply with the HAP contract.

Assignment of the HAP contract will be approved only if the new owner is qualified to become an owner under the HCV program according to the policies

HACB must receive a signed, written request from the existing owner stating the name and address of the new HAP payee and the effective date of the assignment in order to change the HAP payee under an outstanding HAP contract.

The new owner must provide a written certification to HACB that includes:

- A copy of the escrow statement or other document showing the transfer of title and recorded deed;
- A copy of the owner's IRS Form W-9, Request for Taxpayer Identification Number and Certification, or the social security number of the new owner;
- No real estate taxes are owed;
- The effective date of the HAP contract assignment; and
- Confirmation that the new owner is not a prohibited relative.

If the new owner does not agree to an assignment of the HAP contract, or fails to provide the necessary documents, HACB will terminate the HAP contract with the old owner. If the new owner wants to offer the family a new lease, and the family elects to stay with continued assistance, HACB will process the leasing in accordance with the policies.

XIII. Reexaminations

Introduction

HACB is required to reexamine each family's income and composition periodically, and to adjust the family's level of assistance accordingly. Interim reexaminations are also needed in certain situations. This chapter discusses both annual and interim reexaminations, and the recalculation of family share and subsidy that occurs as a result. HUD regulations and HACB policies concerning reexaminations are presented in three parts:

- A. Periodic Reexaminations. Family must recertify their eligibility to continue receiving rental assistance within a 12 month period.
- B. Interim Reexaminations. This part details the requirements for families to report changes in family income and composition between annual reexaminations.

A. Periodic Reexaminations [24 CFR 982.516]

1. Overview

HACB will conduct a reexamination of family income and composition periodically. This includes gathering and verifying current information about family composition, income, and expenses. Based on this updated information, the family's income and rent must be recalculated. This part discusses the schedule for periodic reexaminations, the information to be collected and verified, and periodic reexamination effective dates.

Mandatory Interim Reexaminations Policy

- Residents must request an interim reexamination if any of the following conditions occur:
- Change in family composition that affects the voucher size or bedroom size.
- When requesting the addition of a family member 18 years of age or older.
- Increase in family income of at least \$200.00 per month that is expected to last 30 days or more
- When requesting an addition of a live-in aid

2. Scheduling Periodic Reexaminations [HCV GB P. 12-1].

HACB will begin the periodic reexamination process at least 90 days in advance of its scheduled effective date. HACB will schedule periodic reexamination effective dates to coincide with the family's anniversary date.

Anniversary date is defined as 12 months from the effective date of the family's last annual reexamination or, during a family's first year in the program, from the effective date of the family's initial examination (admission).

If the family moves to a new unit, HACB will perform a new periodic reexamination.

HACB also may schedule a periodic reexamination for completion prior to the anniversary date for administrative purposes.

Notification of and Participation in the Periodic Reexamination Process

HACB is required to obtain the information needed to conduct **periodic** reexaminations. How that information will be collected is left to the discretion of HACB.

Families will be required to participate in a periodic reexamination interview, which must be attended by all adult household members. If the head of household, spouse, or co-head are unable to attend, the appointment will be rescheduled. If participation in an in-person interview poses a hardship because of a family member's disability, the family should contact HACB to request a reasonable accommodation.

Notification of periodic reexamination interviews will be sent by first-class mail and will contain the date, time, and location of the interview. In addition, it will inform the family of the information and documentation that must be brought to the interview.

If the family is unable to attend a scheduled interview, the family should contact HACB in advance of the interview to schedule a new appointment. If a family does not attend the scheduled interview, HACB will send a second notification with a new interview appointment time.

If a family fails to attend two scheduled interviews without HACB approval, or if the notice is returned by the post office with no forwarding address, a notice of termination will be sent to the family's address of record, and to any alternate address provided in the family's file.

An advocate, interpreter, or other assistant may assist the family in the interview process.

3. Conducting Periodic Reexaminations [24 CFR 982.551(b)].

Families will be asked to bring all required information (as described in the reexamination notice) to the reexamination appointment. The required information will include a Personal Declaration form, an Authorization for the Release of Information/Privacy Act Notice, as well as supporting documentation related to the family's income, expenses, and family composition.

Any required documents or information that the family is unable to provide at the time of the interview must be provided within 10 business days of the interview. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension.

If the family does not provide the required documents or information within the required time frame (plus any extensions) the family will be sent a notice of termination.

The information provided by the family generally must be verified in accordance with the policies. Unless the family reports a change, or the agency has reason to believe a change has occurred in information previously reported by the family, certain types of information that are verified at admission typically do not need to be re-verified on an annual basis. These include:

- Legal identity
- Age

- Social security numbers
- A person's disability status if receiving Social Security benefits
- Citizenship or immigration status

If adding a new family member to the unit causes overcrowding according to the Housing Quality Standards (HQS), HACB will issue the family a new voucher, and the family and HACB must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, HACB will terminate the HAP Contract in accordance with its terms [24 CFR 982.403].

4. EFFECTIVE DATES [24 CFR 982.516]

In general, an *increase* in the family share of the rent that results from a **periodic** reexamination will take effect on the family's anniversary date, and the family will be notified at least 30 days in advance.

If less than 30 days remain before the scheduled effective date, the increase will take effect on the first of the month following the end of the 30-day notice period.

If a family moves to a new unit, the increase will take effect on the effective date of the new lease and HAP contract, and no 30-day notice is required.

If HACB chooses to schedule a **periodic** reexamination for completion prior to the family's anniversary date for administrative purposes, the effective date will be determined by HACB, but will always allow for the 30-day notice period.

If the family causes a delay in processing the **periodic** reexamination, *increases* in the family share of the rent will be applied retroactively, to the scheduled effective date of the annual reexamination. The family will be responsible for any overpaid subsidy and may be offered a repayment agreement in accordance with the policies.

In general, a *decrease* in the family share of the rent that results from an annual reexamination will take effect on the family's anniversary date.

If a family moves to a new unit, the decrease will take effect on the effective date of the new lease and HAP contract.

If HACB chooses to schedule a periodic reexamination for completion prior to the family's anniversary date for administrative purposes, the effective date will be determined by HACB.

If the family causes a delay in processing the periodic reexamination, *decreases* in the family share of the rent will be applied prospectively, from the first day of the month following completion of the reexamination processing.

Delays in reexamination processing are considered to be caused by the family if the family fails to provide information requested by HACB by the date specified or does not attend their first scheduled appointment, and this delay prevents HACB from completing the reexamination as scheduled.

B. Interim Reexaminations [24 CFR 982.516]

1. OVERVIEW

Family circumstances may change throughout the period between periodic reexaminations. HUD and HACB policies dictate what kinds of information about changes in family circumstances must be reported, and under what circumstances HACB must process interim reexaminations to reflect those changes. HUD regulations also permit HACB to conduct interim reexaminations of income or family composition at any time. When an interim reexamination is conducted, only those factors that have changed are verified and adjusted [HCV GB, p. 12-10].

In addition to specifying what information the family must report, HUD regulations permit the family to request an interim determination if other aspects of the family's income or composition changes. HACB must complete the interim reexamination within a reasonable time after the family's request.

This part includes HUD and HACB policies describing what changes families are required to report, what changes families may choose to report, and how HACB will process both HACB- and family-initiated interim reexaminations.

2. CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION

HACB will conduct interim reexaminations to account for any changes in household composition that occur between annual reexaminations, except for birth, adoption and court-awarded custody.

The family must inform HACB of marriage, co-habitation, birth, adoption or court-awarded custody of a child within 10 business days.

New Family and Household Members Requiring Approval

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

When any new family member is added, HACB will conduct a reexamination to determine any new income or deductions associated with the additional family member, and to make appropriate adjustments in the family share of the rent and the HAP payment [24 CFR 982.516(e)].

If a change in family size causes a violation of Housing Quality Standards (HQS) space standards, HACB must issue the family a new voucher, and the family and HACB must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, HACB must terminate the HAP contract in accordance with its terms [24 CFR 982.403].

Families must request HACB approval to add a new family member, live-in aide, foster child, or foster adult. This includes any person not on the lease who is expected to stay in the unit for more than 30 consecutive days, or 90 cumulative days, within a twelve month period, and therefore no longer qualifies as a “guest.” Requests must be made in writing and approved by HACB prior to the individual moving in the unit.

HACB will not approve the addition of a new family or household member unless the individual meets HACB’s eligibility criteria.

HACB will not approve the addition of an adult family member, if it will cause a Housing Quality Standard violation (over crowding) or an increase in the payment standard while occupying the unit or any future moves.

HACB in efforts to prevent program abuse, Adult children who previously were part of a household composition as a family member will be initially denied readmission. The Director may consider readmission of the adult member through reasonable accomodation. Returning adult member can not cause a Housing Quality Standard violation or an increase in the voucher size while occupying the unit or any future moves. Returning adult member will have to be screened prior to readmission.

HACB will not approve the addition of a foster child, foster adult or other adult if it will cause a violation of HQS space standards or require a larger voucher size.

If the approval of a live-in aide will cause overcrowding according to HQS standards, the approval letter will explain that the family will be issued another voucher and will be required to move. Voucher size will only be increased by one bedroom size for the live-in aide.

If HACB determines that an individual does not meet HACB’s eligibility criteria, HACB will notify the family in writing of its decision to deny approval of the new family or household member and the reasons for the denial.

HACB will make its determination within 10 business days of receiving all information required to verify the individual’s eligibility.

Departure of a Family or Household Member

[24 CFR 982.551(h)(3)] [24 CFR 982.402]

If a household member ceases to reside in the unit, the family must inform HACB within 10 days. This requirement also applies to a family member who has been considered temporarily absent at the point that the family concludes the individual is permanently absent.

If a live-in aide, foster child, or foster adult ceases to reside in the unit, the family must inform HACB within 10 business days.

3. CHANGES AFFECTING INCOME OR EXPENSES

HACB-Initiated Interim Reexaminations

- HACB will conduct interim reexaminations in each of the following instances:
- For families receiving the Earned Income Disallowance (EID), HACB will conduct an interim reexamination at the start and conclusion of the second 12 month exclusion period (50 percent phase-in period).
- If at the time of the periodic reexamination, tenant-provided documents were used on a provisional basis due to the lack of third-party verification, and third-party verification becomes available, HACB will conduct an interim reexamination.
- HACB may conduct an interim reexamination at any time in order to investigate a tenant fraud complaint.
- HACB may conduct an interim reexamination at any time in order to correct an error but the family will not be charged retroactively. Families will be given decreases, when applicable, retroactive to when the decrease for the change would have been effective if calculated correctly.

Family-Initiated Interim Reexaminations

HACB must adopt policies prescribing when and under what conditions the family must report changes in family income or expenses [24 CFR 982.516(c)]. In addition, HUD regulations require that the family be permitted to obtain interim reexaminations any time the family has experienced a change in circumstances since the last determination [24 CFR 982.516(b)(2)].

Required Reporting

Families who declare zero income as their household income or hardship at their last reexamination are required to report increases in household income within 10 business days of when the change occurs.

HACB will conduct interim reexaminations in the following instances:

- Families that qualify for the earned income disallowance (EID), and only when the EID family's share of rent will change as a result of the increase.
- Any increase in gross household income of at least \$200.00 per month that is expected to last 30 days or more
- If the family has reported zero income, the family will be required to complete a Personal Declaration form every 3 months as long as the family continues to report that they have no income.
- The next 12 months (e.g. seasonal or cyclic income), an interim will be required every 3 months.

4. PROCESSING THE INTERIM REEXAMINATION

Method of Reporting

The family must notify HACB of changes in writing and fill out an Admission and Continued Occupancy (ACO) form.

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

Based on the type of change reported, HACB will determine the documentation the family will be required to submit. The family must submit any required information or documents within 10 business days of receiving a request from HACB. This time frame may be extended for good cause with HACB approval. HACB will accept required documentation by mail, by fax, or in person.

Effective Dates [24 CFR 982.516(d)] [HCV GB, p. 12-10].

If the family share of the rent is to *increase*:

The increase generally will be effective on the first of the month following 30 days' notice to the family.

If a family fails to report a change within the required time frames, or fails to provide all required information within the required time frames, the increase will be applied retroactively, to the date it would have been effective had the information been provided on a timely basis. The family will be responsible for any overpaid subsidy and may be offered a repayment agreement in accordance with the policies.

If the family share of the rent is to *decrease*:

The decrease will be effective on the first day of the month following the month in which the change was reported and all required documentation was submitted. However, no rent reduction will be processed until all the facts have been verified, even if a retroactive adjustment results.

Standard for Timely Reporting of Changes

HACB requires that families report interim changes to HACB within 10 business days of when the change occurs. Any information, document or signature needed from the family in order to verify the change must be provided within 10 business days of the change.

If the change is not reported within the required time period, or if the family fails to provide documentation or signatures, it will be considered untimely reporting.

Procedures when the Change is Not Reported by the Family in a Timely Manner

If the family does not report the change or provide the necessary documents or signatures as described under above, the family will have caused an unreasonable delay in the interim reexamination processing and the following guidelines will apply:

Increase in Tenant Rent will be effective retroactive to the date it would have been effective had it been reported on a timely basis. The family will be liable for any overpaid housing assistance and may be required to sign a Repayment Agreement.

Decrease in Tenant Rent will be effective on the first of the month following the month that HACB received all of the requested information from the family.

Procedures when the Change is Not Processed by HACB in a Timely Manner

"Processed in a timely manner" means that the change goes into effect on the date it should when the family reports the change in a timely manner. If the change cannot be made effective on that date, the change is not processed by HACB in a timely manner. In this case, an increase will be effective after the required thirty (30) days' notice prior to the first of the month after completion of processing by HACB.

If the change resulted in a decrease, the overpayment by the family will be calculated retroactively to the date it should have been effective, and the family will be credited for the amount.

C. Recalculating Family Share and Subsidy Amount

1. Overview

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

2. Changes in Payment Standards and Utility Allowances

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

Payment Standards [24 CFR 982.505]

The family share of the rent and HAP calculations must use the correct payment standard for the family, taking into consideration the family unit size, the size of unit, and the area in which the unit is located [HCV GB, p. 12-5].

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

- If HACB's payment standard amount changes during the term of the HAP contract, the date on which the new standard is applied depends on whether the standard has increased or decreased:
 - If the payment standard amount has *increased*, the increased payment standard will be applied at the *first annual* reexamination following the effective date of the increase in the payment standard.
 - If the payment standard amount has *decreased*, the decreased payment standard will be applied at the *second annual* reexamination following the effective date of the decrease in the payment standard.

- If the family moves to a new unit, or a new HAP contract is executed due to changes in the lease (even if the family remains in place) the current payment standard applicable to the family will be used when the new HAP contract is processed.

Subsidy Standards [24 CFR 982.505(c)(4)]

If there is a change in the family unit size that would apply to a family during the HAP contract term, either due to a change in family composition, or a change in HACB's subsidy standards, the new family unit size must be used to determine the payment standard amount for the family at the family's *first annual* reexamination following the change in family unit size.

Utility Allowances [24 CFR 982.517(d)]

The family share of the rent and HAP calculations must reflect any changes in the family's utility arrangement with the owner, or in HACB's utility allowance schedule [HCV GB, p. 12-5].

When there are changes in the utility arrangement with the owner, HACB will use the utility allowances in effect at the time the new lease and HAP contract are executed.

Revised utility allowances will be applied to a family's rent and subsidy calculations at the first annual reexamination after the allowance is adopted.

3. Notification of New Family Share And Hap Amount

HACB will notify the owner and family of any changes in the amount of the HAP payment [HUD-52641, HAP Contract]. The notice must include the following information [HCV GB, p. 12-6]:

- The amount and effective date of the new HAP payment
- The amount and effective date of the new family share of the rent
- The amount and effective date of the new tenant rent to owner

The family must be given an opportunity for an informal hearing regarding HACB's determination of their annual or adjusted income, and the use of such income to compute the housing assistance payment [24 CFR 982.555(a)(1)(i)].

4. Discrepancies

During an annual or interim reexamination, HACB may discover that information previously reported by the family was in error, or that the family intentionally misrepresented information. In addition, HACB may discover errors made by HACB. When errors resulting in the overpayment or underpayment of subsidy are discovered, corrections will be made in accordance with the policies.

XIV. Moving with Continued Assistance and Portability

INTRODUCTION

Freedom of choice is a hallmark of the housing choice voucher (HCV) program. In general, therefore, HUD regulations impose few restrictions on where families may live or move with HCV assistance. This chapter sets forth HUD regulations and HACB policies governing moves within or outside HACB's jurisdiction in two parts:

- A. **Moving with Continued Assistance.** This part covers the general rules that apply to all moves by a family assisted under HACB's HCV program, whether the family moves to another unit within HACB's jurisdiction or to a unit outside HACB's jurisdiction under portability.
- B. **Portability.** This part covers the special rules that apply to moves by a family under portability, whether the family moves out of or into HACB's jurisdiction. This part also covers the special responsibilities that HACB has under portability regulations and procedures.

A. Moving With Continued Assistance

1. ALLOWABLE MOVES

HUD regulations list five conditions under which an assisted family is allowed to move to a new unit with continued assistance. Permission to move is subject to the restrictions set forth in section 10-I.B.

- The family has a right to terminate the lease on notice to the owner (for the owner's breach or otherwise) and has given a notice of termination to the owner in accordance with the lease [24 CFR 982.314(b)(3)]. If the family terminates the lease on notice to the owner, the family must give HACB a copy of the notice at the same time [24 CFR 982.314(d)(1)].
- The lease for the family's unit has been terminated by mutual agreement of the owner and the family [24 CFR 982.314(b)(1)(ii)]. If the family and the owner mutually agree to terminate the lease for the family's unit, the family must give HACB a copy of the termination agreement.
- The owner has given the family a notice to vacate, has commenced an action to evict the family, or has obtained a court judgment or other process allowing the owner to evict the family [24 CFR 982.314(b)(2)]. The family must give HACB a copy of any owner eviction notice [24 CFR 982.551(g)].
- HACB has terminated the assisted lease for the family's unit for the owner's breach [24 CFR 982.314(b)(1)(i)].
- HACB determines that the family's current unit does not meet the HQS space standards because of an increase in family size or a change in family composition. In such cases, HACB must issue the family a new voucher, and the family and HACB must try to find an acceptable unit as soon as possible. If an acceptable unit is available for the family, HACB must terminate the HAP contract for the family's old unit in accordance with the HAP contract terms and must notify both the family and the owner of the termination. The HAP contract terminates at the end of the calendar month that follows the calendar month in which HACB gives notice to the owner. [24 CFR 982.403(a) and (c)]

- In the event that a dwelling unit does not meet Housing Quality Standards, as determined pursuant to an inspection authorized by HACB, and the Owner has failed to correct the deficiencies pursuant to policies, then HACB will give the family written notice that they must move.

2. RESTRICTIONS ON MOVES

HACB will deny a family permission to move on grounds that HACB does not have sufficient funding for continued assistance if (a) the move is initiated by the family, not the owner or HACB; (b) HACB can demonstrate that the move will, in fact, result in higher subsidy costs; and (c) HACB can demonstrate, in accordance with the policies, that it does not have sufficient funding in its annual budget to accommodate the higher subsidy costs. This policy applies to moves within HACB's jurisdiction as well as to moves outside it under portability.

Grounds for Denial or Termination of Assistance

If HACB has grounds for denying or terminating a family's assistance, HACB will act on those grounds in accordance with the regulations and policies. In general, it will deny a family permission to move for this reason.

However, the Director may make exceptions to these restrictions under special circumstances, which the participant has no control.

Restrictions on Elective Moves [24 CFR 982.314(c)]

HUD regulations permit HACB to prohibit any elective move by a participant family during the family's initial lease term. They also permit HACB to prohibit more than one elective move by a participant family during any 12-month period.

HACB will deny a family permission to make an elective move during the family's initial lease term. This policy applies to moves within HACB's jurisdiction or outside it under portability.

HACB will also deny a family permission to make more than one elective move during any 12-month period. This policy applies to all assisted families residing in HACB's jurisdiction.

HACB will also deny a move if the participant is at full contract rent and no Housing Assistant Payment (HAP) is being made.

HACB will consider exceptions to these policies for the following reasons: to protect the health or safety of a family member (e.g., lead-based paint hazards, domestic violence, witness protection programs), to accommodate a change in family circumstances (e.g., new employment, school attendance in a distant area), or to address an emergency situation over which a family has no control.

In addition, HACB will allow exceptions to these policies for purposes of reasonable accommodation of a family member who is a person with disabilities.

3. MOVING PROCESS

Notification

If a family wishes to move to a new unit, the family must notify HACB and the owner before moving out of the old unit or terminating the lease on notice to the owner [24 CFR 982.314(d)(2)]. If the family wishes to move to a unit outside HACB's jurisdiction under portability, the notice to HACB must specify the area where the family wishes to move [24 CFR 982.314(d)(2)]. The notices must be in writing [24 CFR 982.5].

For administrative reasons, HACB will require at least a thirty (30) day notice prior to move.

The family must give the owner the required number of day's written notice of intent to vacate specified in the lease (usually thirty (30) days) and must give a copy to HACB simultaneously. HACB has a form that the landlord and tenant must complete and sign before the move.

Approval

Upon receipt of a family's notification that it wishes to move, HACB will determine whether the move is approvable in accordance with the regulations and policies.

Reexamination of Family Income and Composition

For families approved to move to a new unit within HACB's jurisdiction, HACB will perform a new annual reexamination in accordance with the policies of this plan if the family has not been recertified within the last 90 days.

For families moving into or families approved to move out of HACB's jurisdiction under portability, HACB will follow the policies set forth in Part II of this chapter.

Voucher Issuance and Briefing

For families approved to move to a new unit within HACB's jurisdiction, HACB will issue a new voucher. No briefing is required for these families. If a family does not locate a new unit within the term of the voucher and any extensions, the family may remain in its current unit with continued voucher assistance if the owner agrees and HACB approves. Otherwise, the family will lose its assistance.

For families moving into or families approved to move out of HACB's jurisdiction under portability, HACB will follow the policies set forth in Part II of this chapter.

Housing Assistance Payments [24 CFR 982.311(d)]

When a family moves out of an assisted unit, HACB will not make any housing assistance payment to the owner for any month **after** the month the family moves out unless proper notice was given to end a lease mid-month. The owner may keep the housing assistance payment for the month when the family moves out of the unit.

If a participant family moves from an assisted unit with continued tenant-based assistance, the term of the assisted lease for the new assisted unit may begin during the month the family moves out of the first assisted unit. Overlap of the last housing assistance payment (for the month when the family moves out of the old unit) and the first assistance payment for the new unit is not considered to constitute a duplicative housing subsidy.

If a participant family moves within the same building or project, or between buildings owned by the same owner, the move will be processed like any other move, except that there will be no overlapping assistance.

The annual recertification date will be changed to coincide with the new lease up date.

B. Portability

1. OVERVIEW

Within the limitations of the regulations and this plan, a participant family or an applicant family that has been issued a voucher has the right to use tenant-based voucher assistance to lease a unit anywhere in the United States providing that the unit is located within the jurisdiction of a PHA administering a tenant-based voucher program [24 CFR 982.353(b)]. The process by which a family obtains a voucher from one PHA and uses it to lease a unit in the jurisdiction of another PHA is known as portability. The first PHA is called the **initial PHA**. The second is called the **receiving PHA**.

The receiving PHA has the option of administering the family's voucher for the initial PHA or absorbing the family into its own program. Under the first option, the receiving PHA bills the initial PHA for the family's housing assistance payments and the fees for administering the family's voucher. Under the second option, the receiving PHA pays for the family's assistance out of its own program funds, and the initial PHA has no further relationship with the family.

The same PHA commonly acts as the initial PHA for some families and as the receiving PHA for others. Each role involves different responsibilities. HACB will follow the rules and policies when it is acting as the initial PHA for a family. It will follow the rules and policies in this plan when it is acting as the receiving PHA for a family.

2. HACB's RESPONSIBILITIES AS INITIAL PHA

Allowable Moves under Portability

A family may move with voucher assistance only to an area where there is at least one PHA administering a voucher program [24 CFR 982.353(b)]. If there is more than one PHA in the area, the initial PHA will choose the receiving PHA [24 CFR 982.355(b)].

Applicant families that have been issued vouchers as well as participant families may qualify to lease a unit outside HACB's jurisdiction under portability. The initial PHA, in accordance with HUD regulations and HACB policy, determines whether a family qualifies.

Applicant Families

In determining whether or not to deny an applicant family permission to move under portability because HACB lacks sufficient funding or has grounds for denying assistance to the family, the initial PHA will follow the policies established in this chapter.

If neither the head nor the spouse had a domicile (legal residence) in HACB's jurisdiction at the date of their initial application for assistance, the family will not be allowed to exercise portability for at least twelve (12) months after they are admitted to the program, unless HACB approves such move. [NOTE: local government defines legal domicile]

HACB will approve such a move if it relates to an opportunity for education, job training or employment.

Applicants that participate in the Special Mobility may have the Portability Restriction waived so that regardless of whether they had a legal residence in Bridgeport at the time of initial application, they will be allowed to exercise portability. Due to the limited availability of Special Mobility, applicants will be selected by random lottery selection, if necessary.

HACB will also consider exceptions to this policy for purposes of reasonable accommodation. However, any exception to this policy is subject to the approval of the receiving PHA [24 CFR 982.353(c)(3)].

Participant Families

HACB will not provide portable assistance for a participant if a family has moved out of its assisted unit in violation of the lease. [24 CFR 982.3539b).]

HACB will not permit families to exercise portability

- If the family is in violation of a family obligation.
- If the family owes money to HACB.
- If the family has moved out of its assisted unit in violation of the lease.

HACB will determine whether a participant family may move out of HACB's jurisdiction with continued assistance in accordance with the regulations and policies set forth here in this chapter.

Determining Income Eligibility

Applicant Families

An applicant family may lease a unit in a particular area under portability only if the family is income eligible for admission to the voucher program in that area [24 CFR 982.353(d)(3)]. The family must specify the area to which the family wishes to move.

HACB will determine whether the family is income eligible in the area to which the family wishes to move [24 CFR 982.355(c)(1)]. If the applicant family is not income eligible in that area, HACB will inform the family that it may not move there and receive voucher assistance

Participant Families

The income eligibility of a participant family is not redetermined if the family moves to a new jurisdiction under portability [24 CFR 982.353(d)(2), 24 CFR 982.355(c)(1)].

Reexamination of Family Income and Composition

A new reexamination of family income and composition will be required for an applicant family.

For a participant family approved to move out of its jurisdiction under portability, HACB will conduct a reexamination of family income and composition if a reexamination has not been conducted in the last 90 days.

HACB will make any exceptions to this policy necessary to remain in compliance with HUD regulations.

Briefing

No formal briefing will be required for a participant family wishing to move outside HACB's jurisdiction under portability. However, HACB will provide the name, address, and phone of the contact for HACB in the jurisdiction to which they wish to move. HACB will advise the family that they will be under the receiving housing authority's policies and procedures, including subsidy standards and voucher extension policies.

Voucher Issuance and Term

An applicant family has no right to portability until after the family has been issued a voucher [24 CFR 982.353(b)]. In issuing vouchers to applicant families, HACB will follow the regulations and procedures. A new voucher is not required for portability purposes.

For participant families approved to move under portability, HACB will issue a new voucher.

Voucher Extensions and Expiration

HACB will approve no extensions to a voucher issued to an applicant or participant family porting out of HACB's jurisdiction except under the following circumstances: (a) the initial term of the voucher will expire before the portable family will be issued a voucher by the receiving PHA, (b) the family decides to return to the initial PHA's jurisdiction and search for a unit there, or (c) the family decides to search for a unit in a third PHA's jurisdiction. In such cases, the policies on voucher extensions set forth in HACB policies, of this plan will apply, including the requirement that the family apply for an extension in writing prior to the expiration of the initial voucher term.

To receive or continue receiving assistance under the initial PHA's voucher program, a family that moves to another PHA's jurisdiction under portability must be under HAP contract in the receiving PHA's jurisdiction within 60 days following the expiration date of the initial PHA's voucher term (including any extensions). (See below under "Initial Billing Deadline" for one exception to this policy.)

Initial Contact with the Receiving PHA

After approving a family's request to move under portability, HACB will promptly notify the receiving PHA to expect the family by sending Part 1 of HUD form 52665. Because the portability process is time-sensitive, HACB will send HUD form 52665 by fax, or mail.

The initial PHA will advise the family how to contact and request assistance from the receiving PHA [24 CFR 982.355(c)(2)].

Sending Documentation to the Receiving PHA

HACB will send the receiving PHA the following documents:

- Form HUD-52665, Family Portability Information, with Part I filled out.
- A copy of the family's voucher
- A copy of the family's most recent form HUD-50058, Family Report, or, if necessary in the case of an applicant family, family and income information in a format similar to that of form HUD-50058 [24 CFR 982.355(c)(4).
- Copies of the income verifications backing up the form HUD-50058 [24 CFR 982.355(c)(4).

In addition to these documents, HACB will provide the documentation that the receiving PHA may need to expedite the issuance of the voucher in their jurisdiction.

Initial Billing Deadline

When HACB sends form HUD-52665 to the receiving PHA, it specifies in Part I the deadline by which it must receive the initial billing notice from the receiving PHA. This deadline is 60 days following the expiration date of the voucher issued to the family by HACB.

If HACB has not received an initial billing notice from the receiving PHA by the deadline specified on form HUD-52665, it will contact the receiving PHA by phone, fax, or e-mail. If HACB reports that the family is not yet under HAP contract, HACB will inform the receiving PHA that it will not honor a late billing submission and will return any subsequent billings that it receives on behalf of the family. HACB will send the receiving PHA a written confirmation of its decision by mail.

HACB will allow an exception to this policy if the family includes a person with disabilities and the late billing is a result of a reasonable accommodation granted to the family by the receiving PHA.

If HACB reports that the family is under HAP contract and the receiving PHA cannot absorb the family, HACB must accept a late billing submission; however, it may report to HUD the receiving PHA's failure to comply with the deadline.

Monthly Billing Payments [24 CFR 982.355(e)]

If the receiving PHA is administering the family's voucher, HACB will make billing payments in a timely manner. The first billing amount will be due within 30 days after HACB receives Part II of form HUD-52665 from the receiving PHA. Subsequent payments must be **received** by the receiving PHA no later than the fifth business day of each month. The payments must be provided in a form and manner that the receiving PHA is able and willing to accept.

HACB may not terminate or delay making payments under existing portability billing arrangements as a result of over leasing or funding shortfalls. HACB will manage its tenant-based program in a manner that ensures that it has the financial ability to provide assistance for families that move out of its jurisdiction under portability and are not absorbed by receiving PHAs as well as for families that remain within its jurisdiction.

Annual Updates of Form HUD-50058

If HACB is being billed on behalf of a portable family, it should receive an updated form HUD-50058 each year from the receiving PHA. If HACB fails to receive an updated 50058 by the family's annual reexamination date, the initial PHA will contact the receiving PHA to verify the status of the family.

Subsequent Family Moves

Within the Receiving PHA's Jurisdiction [24 CFR 314(e)(1)]

If HACB determines that it must deny moves on the grounds that it lacks sufficient funding, it will notify all receiving PHAs with which it has entered into portability billing arrangements that they, too, must deny moves to higher cost units by portable families from HACB's jurisdiction.

HACB will allow exceptions to this policy for purposes of reasonable accommodation of a family member who is a person with disabilities.

Outside the Receiving PHA's Jurisdiction

If HACB is assisting a portable family under a billing arrangement and the family subsequently decides to move out of the receiving PHA's jurisdiction, HACB is responsible for issuing the family a voucher while the family is either being assisted or has a voucher from the receiving PHA and, if the family wishes to port to another jurisdiction, sending form HUD-52665 and supporting documentation to the new receiving PHA. Any extensions of HACB voucher necessary to allow the family additional search-time to return to HACB's jurisdiction or to move to another jurisdiction would be at the discretion of HACB.

Denial or Termination of Assistance [24 CFR 982.355(c)(9)]

If HACB has grounds for denying or terminating assistance for a portable family that has not been absorbed by the receiving PHA, HACB will act on those grounds at any time.

3. HACB RESPONSIBILITIES AS THE RECEIVING PHA

If a family has a right to lease a unit in HACB's jurisdiction under portability, HACB will provide assistance for the family [24 CFR 982.355(10)].

HACB's procedures and preferences for selection among eligible applicants do not apply, and the PHA's waiting list is not used [24 CFR 982.355(10)]. However, the family's unit, or voucher, size is determined in accordance with the subsidy standards of the receiving PHA [24 CFR 982.355(7)], and the amount of the family's housing assistance payment is determined in the same manner as for other families in HACB's voucher program [24 CFR 982.355(e)(2)].

Initial Contact with Family

When a family moves into HACB's jurisdiction under portability, the family is responsible for promptly contacting HACB and complying with HACB's procedures for incoming portable families [24 CFR 982.355(c)(3)].

HACB will promptly issue a voucher to the family for its search in HACB's jurisdiction, the term of which may not expire before the expiration date of the initial PHA voucher. If the voucher issued to the family by the initial PHA has expired, the receiving PHA does not process the family's paperwork but instead refers the family back to the initial PHA.

When a portable family requests assistance from HACB, HACB will promptly inform the initial PHA whether HACB will bill the initial PHA for assistance on behalf of the portable family or will absorb the family into its own program [24 CFR 982.355(c)(5)]. If HACB initially bills the initial PHA for the family's assistance, it may later decide to absorb the family into its own program. (See later under "Absorbing a Portable Family" for more on this topic.)

If for any reason HACB refuses to process or provide assistance to a family under the portability procedures, the family must be given the opportunity for an informal review or hearing (For more on this topic, see later under "Denial or Termination of Assistance.")

Briefing

HUD allows the receiving PHA to require a briefing for an incoming portable family as long as the requirement does not unduly delay the family's search.

Since the family has been briefed, HACB will not require the family to attend a formal briefing. HACB will provide the family with a briefing packet and, in an individual briefing, will orally inform the family about HACB's payment and subsidy standards, procedures for requesting approval of a unit, the unit inspection process, and the leasing process.

Income Eligibility and Reexamination

If the incoming portable family wishes to change their family composition prior to being issued a voucher by HACB, the family will be referred back to its initial PHA.

For any family moving into its jurisdiction under portability, HACB will conduct a new reexamination of family income and composition. However, HACB will not delay issuing the family a voucher for this reason. Nor will HACB delay approving a unit for the family until the reexamination process is complete unless the family is an applicant and HACB cannot otherwise confirm that the family is income eligible for admission to the program in the area where the unit is located.

In conducting its own reexamination, HACB will rely upon any verification provided by the initial PHA to the extent that they (a) accurately reflect the family's current circumstances and (b) were obtained within the last 90 days. Any new information may be verified by documents provided by the family and adjusted, if necessary, when third party verification is received.

HACB will conduct a criminal background check on all adult household members. The family must meet HACB's criteria for criminal background checks. HACB will accept the criminal background check performed by the initial PHA providing, it is no more than 90 days old.

Voucher Issuance

When a family moves into its jurisdiction under portability, HACB will issue the family a voucher [24 CFR 982.355(b)(6)]. The family must submit a request for tenancy approval to HACB during the term of HACB's voucher [24 CFR 982.355(c)(6)].

Timing of Voucher Issuance

When a family port into its jurisdiction HACB will not issue the voucher if the family's paperwork from the initial PHA is incomplete, the family's voucher from the initial PHA has expired or the family does not comply with HACB's procedures.

HACB will issue the voucher within two weeks after receiving the family's paperwork from the initial PHA provided the information is in order, the family has contacted HACB, and the family complies with HACB's procedures.

HACB will update the family's information when verification has been completed.

Voucher Term

HACB's voucher will expire on the same date as the initial PHAs voucher.

Voucher Extensions [24 CFR 982.355(c)(6), Notice 2004-12]

HACB generally will not extend the term of the voucher that it issues to an incoming portable family unless HACB plans to absorb the family into its own program, in which case it will follow the policies on voucher extension.

HACB will not process the family if the initial PHA voucher has already expired when it receives the paperwork form the initial PHA. The family will be referred back to the initial PHA for them to decide whether to extend the term of the initial PHA voucher (and the billing deadline) before HACB would process the portability move.

HACB will consider an exception to this policy as a reasonable accommodation to a person with disabilities.

Requests for Tenancy Approval (RFTA)

The family must submit a RFTA for an eligible unit to HACB during the term of HACB voucher.

When the family submits a RFTA, it will be processed using HACB's policies and procedures.

Notifying the Initial PHA

HACB must promptly notify the initial PHA if the family has leased an eligible unit under the program or if the family fails to submit a request for tenancy approval for an eligible unit within the term of the receiving PHA's voucher [24 CFR 982.355(c)(8)]. HACB will use Part II of form HUD-52665, Family Portability Information, for this purpose [24 CFR 982.355(e)(5)]. (For more on this topic and the deadline for notification, see below under "Administering a Portable Family's Voucher.")

If an incoming portable family ultimately decides not to lease in the jurisdiction of HACB but instead wishes to return to the initial PHA's jurisdiction or to search in another jurisdiction, HACB must refer the family back to the initial PHA. In such a case the voucher of record for the family is once again the voucher originally issued by the initial PHA. Any extension of search time provided by the receiving PHA's voucher is only valid for the family's search in the receiving PHA's jurisdiction.

Administering a Portable Family's Voucher

Initial Billing Deadline

If a portable family's search for a unit is successful and HACB intends to administer the family's voucher, HACB must submit its initial billing notice (Part II of form HUD-52665) (a) no later than 10 business days following the date HACB **executes** a HAP contract on behalf of the family **and** (b) in time that the notice will be **received** no later than 60 days following the expiration date of the family's voucher issued by the initial PHA. A copy of the family's form HUD-50058, Family Report, completed by HACB must be attached to the initial billing notice. HACB may send these documents by mail, or fax.

If HACB fails to send the initial billing within 10` following the date the HAP contract is executed, it will absorb the family into its own program unless (a) the initial PHA is willing to accept the late submission or (b) HUD requires the initial PHA to honor the late submission (e.g., because the receiving PHA is overleased)

Ongoing Notification Responsibilities [HUD-52665]

Annual Reexamination. HACB must send the initial PHA a copy of a portable family's updated form HUD-50058 by mail or fax after each annual reexamination for the duration of time HACB is billing the initial PHA on behalf of the family, regardless of whether there is a change in the billing amount.

Change in Billing Amount. The receiving PHA is required to notify the initial PHA, using form HUD-52665, of any change in the billing amount for the family as a result of:

- A change in the HAP amount (because of a reexamination, a change in the applicable payment standard, a move to another unit, etc.)
- An abatement or subsequent resumption of the HAP payments
- Termination of the HAP contract
- Payment of a damage/vacancy loss claim for the family
- Termination of the family from the program

The timing of the notice of the change in the billing amount should correspond with the notification to the owner and the family in order to provide the initial PHA with advance notice of the change. Under no circumstances will the notification be later than 10 business days following the effective date of the change in the billing amount.

Late Payments

If the initial PHA fails to make a monthly payment for a portable family by the fifth business day of the month, HACB will promptly notify the initial PHA in writing of the deficiency. The notice must identify the family, the amount of the billing payment, the date the billing payment was due, and the date the billing payment was received (if it arrived late). HACB will send a copy of the notification to the Office of Public Housing (OPH) in the Hartford HUD area office. If the initial PHA fails to correct the problem by the second month following the notification, HACB may request by memorandum to the director of the Hartford OPH that HUD transfer the unit in question. A copy of the initial notification and any subsequent correspondence between the PHA's on the matter must be attached. HACB will send a copy of the memorandum to the initial PHA. If the OPH decides to grant the transfer, the billing arrangement on behalf of the family ceases with the transfer, but the initial PHA is still responsible for any outstanding payments due to HACB.

Overpayments

In all cases where HACB has received billing payments for billing arrangements no longer in effect, HACB is responsible for returning the full amount of the overpayment (including the portion provided for administrative fees) to the initial PHA.

In the event that HUD determines billing payments have continued for at least three months because HACB failed to notify the initial PHA that the billing arrangement was terminated, HACB must take the following steps:

- Return the full amount of the overpayment, including the portion provided for administrative fees, to the initial PHA.
- Once full payment has been returned, notify the Office of Public Housing in the Hartford HUD area office of the date and the amount of reimbursement to the initial PHA.

At HUD's discretion, HACB will be subject to the sanctions spelled out in

Denial or Termination of Assistance [24 CFR 982.355(c)(9), 24 CFR 982.355(c)(10)].

At any time, HACB may make a determination to deny or terminate assistance to a portable family for family action or inaction.

If HACB elects to deny or terminate assistance for a portable family, HACB will notify the initial PHA within 10 business days after the informal review or hearing if the denial or termination is upheld. The informal review or hearing will be held in accordance with the policies. If requested, HACB will furnish the initial PHA with a copy of the review or hearing decision.

Absorbing a Portable Family [24 CFR 982.355(d)(1)]

HACB will absorb an incoming portable family into its own program when HACB executes a HAP contract on behalf of the family or at any time thereafter providing that (a) HACB has funding available under its annual contributions contract (ACC) and (b) absorbing the family will not result in overleasing.

If HACB absorbs a family from the point of admission, the admission will be counted against the income targeting obligation of HACB [24 CFR 982.201(b)(2)(vii)].

If HACB decides to absorb a portable family upon the execution of a HAP contract on behalf of the family, HACB will notify the initial PHA by the initial billing deadline specified on form HUD-52665. The effective date of the HAP contract will be the effective date of the absorption.

If HACB decides to absorb a family after that, it will provide the initial PHA with 30 days' advance notice.

Following the absorption of an incoming portable family, the family is assisted with funds available under the consolidated ACC for HACB's voucher program [24 CFR 982.355(d)], and HACB will become the initial PHA in any subsequent moves by the family under portability.

MOVES FROM PROJECT-BASED SECTION 8 ASSISTED UNITS WITH CONTINUED ASSISTANCE

This provision applies only to project-based Section 8-assisted units developed under new statutory provisions implemented in 2001.

If a household moves out of its project-based unit at any time after the first twelve months of assisted occupancy, HACB will offer the family available tenant-based rental assistance, either under the voucher program or under another comparable form of tenant-based assistance **if funds are available**. Such alternative tenant-based assistance must be comparable to assistance under the voucher program in terms of income, assistance, rent contribution, affordability, and other requirements. The family must satisfy all HACB requirements for eligibility for continued assistance as provided in the Section 8 Administrative Plan. The family will be allowed to transfer to another Project Based unit within the Housing Choice Voucher Program. If no units in their size are available, the family will be put on a Project Based Wait List.

HUD Reviews

HUD will perform periodic reviews of HACB with respect to portability billing arrangements. HACB will be required to submit information on families covered under billing arrangements and HUD will determine if the information is consistent with other PHA's. HUD will compare portability billing records with other PHA's to identify and address discrepancies before the HUD review.

XV. HACB'S PROJECT-BASED VOUCHER (PBV) PROGRAM

On October 13, 2005, HUD published final regulations for the PBV program, superseding regulations at 24 CFR part 983 (see 70 FR 59892). This Addendum provides HACB's policies and procedures for its PBV program in accord with the new regulations.

HACB's PBV program is subject to the regulations at 24 CFR part 983, which includes regulations governing policies and procedures that are not specified in this Administrative Plan.

In addition to the policies and procedures stated below, and other PBV regulations stated at 24 CFR part 983, HACB's PBV program is subject to most of the requirements of the Housing Choice Voucher Program, as specified in this Administrative Plan and in other HUD regulations.

A. HACB'S PBV COMMITMENTS AND PRIORITIES

HACB's PBV program is designed to ensure that PBV assistance is used to support goals that could not be equally achieved through the use of tenant-based voucher assistance. HACB's PBV program has is committed to the following priorities:

1. Supportive housing for families and persons with disabilities;
2. Accessible housing for persons with mobility limitations;
3. Affordable housing opportunities in mixed-income developments and in neighborhoods that underserve low-income families, including neighborhoods with low minority concentrations and low concentrations of poverty
4. Neighborhood revitalization projects, including redevelopment of HACB's public housing communities.
5. Assisting families in imminent danger of homelessness, due to foreclosures on the properties where they reside.

B. PROPOSAL SUBMISSION AND SELECTION

Request for Proposals Process

HACB will select PBV proposals through a public Request for Proposals (RFP) process.

HACB's PBV RFP will be advertised in a manner to provide broad public notice of the opportunity to offer PBV proposals for consideration by HACB. The public notice procedures will include publication of the general notice in a local newspaper of general circulation and other means designed and actually operated to provide broad public notice.

The public notice of the PBV RFP will specify the submission deadline. The public notice will inform potential proposers of the availability of the full RFP document at HACB's main offices at 150 Highland Avenue.

The full RFP document will provide detailed information about proposal submission and selection procedures and will be available upon request of interested parties at HACB's main offices.

6. Property owners may submit PBV proposals in accord with the proposal submission guidelines stated in the full RFP document. Proposals will be selected according to explicit criteria specified in the full RFP document, following the selection criteria stated below. Under no circumstances will HACB's RFP selection criteria limit proposals to a single site or impose restrictions that explicitly or practically preclude owner submission of proposals for PBV housing on different sites.

Alternative Competitive Processes

HUD regulations permit HACB to select a PBV proposal for housing assisted under a federal, state, or local government housing assistance, community development, or supportive services program that requires competitive selection of proposals, where the proposal has been selected in accordance with such program's competitive selection requirements within three years of the PBV proposal selection date, and the earlier competitive selection proposal did not involve any consideration that the project would receive PBV assistance.

HACB's selection of proposals under the alternative competitive processes may be contingent upon the owner providing additional information required according to HACB's selection requirements and HUD and HACB requirements for PBV assistance.

Selection Criteria

Proposals will be selected according to the following selection criteria:

- The housing must promote one of HACB's 4 priorities for its PBV program;
- The proposal must comply with all HUD program regulations and requirements;
- The property must be eligible housing;
- The proposal must comply with the HUD cap on PBV units per building;
- The housing site must meet the site selection standards;
- Proposals for new construction or rehabilitation projects must demonstrate capacity, experience, and successful outcomes in prior projects that indicate their ability to complete the construction work effectively and within the proposed schedule;
- Proposals for all housing must demonstrate capacity, experience, and successful outcomes in property management, particularly management of housing targeted to low income persons and families;
- Proposals for supportive housing must demonstrate the capacity, experience, and successful outcomes of the supportive services provider that indicate its ability to effectively provide sufficient supportive services. More detailed information about minimum supportive services guidelines is provided later in this addendum.
- Proposals must provide evidence of sufficient financing commitments (for construction, operations, and supportive services if applicable) to demonstrate the project's long-term viability.

Board Approval of Selected Proposals

Selection of any proposal for project-based voucher assistance must be approved by HACB's Board of Commissioners.

Public Notice and Review of HACB Proposal Selection

HACB will provide public notice of PBV proposal selections, including publication of public notice in a local newspaper of general circulation and other means designed and actually operated to provide broad public notice.

HACB will make documentation available for public inspection regarding the basis for HACB's selection of a PBV proposal.

C. SITE SELECTION STANDARDS

HACB will select proposals only for PBV units that are eligible housing located in sites that promote the following PBV goals:

- Deconcentrating poverty and expanding housing and economic opportunities;
- Promoting civil rights laws and regulations;
- Minimizing minority concentration;
- Other site selection standards and goals related to ensuring housing quality and expanded opportunity for low income families.

Site Selection Standards

Following are the basic site requirements for HACB PBV units:

- Locating PBV-assisted housing on this site is consistent with the goals of deconcentrating poverty and expanding housing and economic opportunities;
- Locating PBV-assisted housing on this site is consistent with the goals of civil rights laws and regulations;
- Locating PBV-assisted housing on this site is consistent with the goals of providing equal housing opportunity and minimizing minority concentration;
- The site must meet the HQS standards at 24 CFR 982.401(l).
- The site must be adequate in size, exposure and contour to accommodate the number and type of units proposed; adequate utilities and streets must be available to service the site.
- The site must promote greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high proportion of low-income persons
- The site must be accessible to social, recreational, educational, commercial, and health facilities and services, and other municipal facilities and services that are at least equivalent to those typically found in neighborhoods consisting largely of unassisted standard housing of similar market rents.
- The site must be so located that travel time and cost via public transportation or private automobile from the neighborhood to places of employment providing a range of jobs for lower income workers is not excessive. While it is important that housing for the elderly not be totally isolated from employment opportunities, this requirement need not be adhered to rigidly for elderly housing.
- The site and housing units must comply with Section 504 of the Rehabilitation Act and other fair housing and civil rights laws and requirements for effectively serving persons with disabilities.

In addition, the following site requirements are applicable to all new construction projects:

- The neighborhood must not be one which is seriously detrimental to family life or in which substandard dwellings or other undesirable conditions predominate, unless there is actively in progress a concerted program to remedy the undesired conditions.
- The site must not be located in an area of minority concentration.

D. SUPPORTIVE SERVICES GUIDELINES AND REQUIREMENTS

HUD regulations limit PBV assistance to 25% of units per building, with some exceptions, including an exception for units designated for families receiving supportive services. This section provides HACB's requirements for qualifying supportive services, and related requirements for PBV assistance to units designated for families receiving supportive services. These supportive services guidelines and requirements are particularly relevant to HACB's PBV program because HACB has established a priority for PBV assistance for supportive housing.

Qualifying Supportive Services

HACB has established a priority for committing PBV units for supportive housing. Effective supportive housing services should be determined according to the need of individual families, and may vary significantly from family to family, but should include the following supportive services:

Case management services with extended day hours availability and on-call availability for crises;

- Coordination of needed medical and health care services;
- Coordination of needed clinical services;
- Assistance in helping persons access substance abuse treatment, if needed, and maintain sobriety;
- Counseling and assistance with daily living skills;
- Coordination with educational opportunities, including GED preparation;
- Coordination with vocational services, including coordination with job training and employment services;
- Budget counseling and assistance in applying for appropriate benefits;
- Coordination with transportation assistance, including transportation to medical appointments and transportation related to employment or other economic self-sufficiency activities;
- Coordination with child care resources and other opportunities for children and youth;
- Full-family wrap-around services targeted to the specific service needs of the family members.

HACB welcomes PBV proposals from any supportive housing provider. HACB recognizes that the specific services provided, and the intensity of services, will vary depending upon the type of supportive services and the target population to be served. HACB has established a priority for supportive housing. Our aim is to provide PBV housing assistance for supportive housing programs with services that help individuals and families to maintain their housing and to live independently and effectively in their communities. We will use the following guidelines in evaluating proposed supportive service programs:

- The supportive service program has a history and track record of effectively serving persons or families who, in the absence of supportive services, may have difficulty maintaining housing. This may be indicated by a successful history of services targeted to homeless persons or persons with behavioral health disabilities, or other disabilities that may be associated with barriers to the persons ability to maintain housing.
- Individualized and intensive case management services that include development of individualized supportive service plans, and regular meetings and monitoring to ensure that participants maintain compliance with their supportive service plan.
- As a general guideline, a staff to client ratio exceeding 1:25 will likely to be considered to be insufficiently staffed to provide the level of intensive supportive services that HACB seeks for supportive housing programs that HACB intends to support with PBV assistance. Our intent is to target our PBV resources to persons with significant supportive housing needs, for which a staff to client ratio of 1:10-15 is most appropriate.

Family Responsibility to Comply with Supportive Service Plans

Families selected for occupancy and assistance in a PBV supportive housing unit will be required to enter into an individualized supportive service plan with the service provider. The supportive service plan is intended to help the family to build family self-sufficiency, to maintain their housing and to live independently and effectively in their community, according to the family's individual needs.

To qualify for PBV assistance, the family must have lease one family member receiving supportive services providing by the PBV supportive housing program. At the time of initial lease execution between the family and the owner, the family and HACB must sign a statement of family responsibility. The statement of family responsibility must contain all family obligations including the family's participation in a supportive service plan.

At the family's annual recertification, HACB will require written documentation from the service provider indicating the family's continued compliance with the terms of the supportive services plans. At HACB's discretion, HACB may request quarterly documentation of service plan compliance for new participants, or otherwise more frequent periodic documentation for families who have not fully complied with their supportive service plan.

The family is eligible to receive PBV assistance while the family is compliant with its supportive services plan. In addition, a family who has occupied a PBV unit and has been compliant with its supportive housing plan, and has successfully completed the supportive housing plan, is eligible to continue to receive PBV assistance so long as the family resides in the unit.

Families That Do Not Continue to Qualify as Families Receiving Supportive Services

If a family in a supportive housing unit fails, without good cause, to complete its supportive service plan, HACB will be required to terminate PBV assistance, and the owner may terminate the lease.

E. WAITING LISTS

HACB will establish individual waiting lists for each PBV project selected. These applicants will be selected from the LIPH waitlist in accordance with the Father Panik Consent Decree. Applicants will be screened and verified for the need of supportive services provided for any particular unit.

HACB will offer to place applicants who are listed on the waiting list for tenant-based assistance on the waiting list(s) for PBV assistance.

F. PREFERENCES

HACB may establish separate preferences for each PBV program depending on the services attached to the unit.

These preferences may include the following:

- Preferences for elderly families;
- Preferences for disabled families;
- Preferences related to supportive housing programs;
- Preferences for families in imminent danger of homelessness due to foreclosures on the properties where they reside;
- Preferences for the chronic homelessness in accordance with HUD definitions;
- Preferences for Substance Abuse and Mental Health Service Administration (SAMHSA)

The specific preferences for each individual PBV project will be explicitly stated in HACB's PBV Preference form, provided to all applicants to PBV or tenant-based Housing Choice Voucher assistance.

Preferences Related to Supportive Housing Programs

In selecting families for PBV units designated for families receiving supportive services, HACB's preferences will be structured to give preference to disabled families who need the supportive services offered at a particular project, in accordance with the limits described below.

The preference is limited to the population of families (including individuals) with disabilities that significantly interfere with their ability to obtain and maintain themselves in housing and

- Who, without appropriate supportive services, will not be able to obtain or maintain themselves in housing; and
- For whom such services cannot be provided in a nonsegregated setting.

The project must be open to all otherwise eligible persons with disabilities who may benefit from services provided in the project; and disabled residents shall not be required to accept the particular services offered at the project.

According to federal laws and regulations, HACB is prohibited from granting preferences to persons with specific disabilities (see 24 CFR 982.207(b)(3)).

G. APPLYING FOR ADMISSION

Participants may apply for admission to one or more PBV programs by submitting a pre-application to HACB.

HACB may close one or more of its individual waiting lists for individual PBV programs for general applications but may accept applications for a specific PBV program from an applicant that has submitted documentation of qualification for preference to that PBV program.

HACB's PBV Preference form will provide information about qualifications and documentation necessary to qualify for preferences for each of HACB's individual PBV waiting lists. This PBV Preference form will be available to the public at HACB's main office.

H. TENANT SELECTION

When there is a vacancy in a PBV unit, HACB will select tenants according to the following procedures:

Applicants will be selected from the LIPH waitlist in accordance with the Father Panik Consent Decree based on bedroom size availability

For LIPH waiting lists that include preferences, HACB will select applicants from the waiting list who:

- Qualified for preference at the time of application; and
- Continue to qualify for preference at the time of admission.

I. TENANT SCREENING

HACB's procedures for tenant screening for the PBV program are not different than procedures for screening tenant-based applicants, which are provided in HACB's Administrative Plan.

HACB's policy for providing information to owners about families referred to PBV units is not different than HACB's policies for tenant-based applicants, which are provided in HACB's Administrative Plan.

J. PROCEDURES FOR FAMILIES OCCUPYING A UNIT OF THE WRONG SIZE OR AN ACCESSIBLE UNIT WHOSE ACCESSIBILITY FEATURES ARE NOT REQUIRED BY THE FAMILY

If HACB determines that the family is occupying a wrong-sized unit for the family's size and composition, HACB must promptly notify the family and the owner of this determination, and of HACB's offer of continued assistance.

Likewise, if HACB determines that the family is occupying an accessible unit when the accessibility features are not required by the family, HACB must promptly notify the family and the owner of this determination, and of HACB's offer of continued assistance.

HACB must offer the family the opportunity to receive continued housing assistance in another unit, which may include, at HACB's discretion and subject to availability:

- PBV assistance in an appropriate-sized unit (in the same building or in another building);
- Other project-based housing assistance (including occupancy of a public housing unit)
- Tenant-based rental assistance under the voucher program; if funds are available as a last recourse; or
- Other comparable public or private tenant-based assistance (e.g., under the HOME program).

For families who have been notified that they occupy a wrong-size unit, and offered continued assistance:

- If the PHA offers the family the opportunity to receive tenant-based rental assistance under the voucher program, the PHA must terminate the HPA payments for a wrong-sized unit at expiration of the term of the family's voucher (including any extensions granted by the PHA).
- If the PHA offers the family the opportunity for another form of continued housing assistance (as provided above), and the family does not accept the offer, does not move out of the PBV unit within a reasonable time as determined by the PHA, or both, the PHA must terminate the HAP payments for the wrong-sized unit, at the expiration of a reasonable period as determined by the PHA.

XVI. FAMILY SELF-SUFFICIENCY

A. OVERVIEW

The Family Self-Sufficiency (FSS) program is intended to promote the development of local strategies for coordinating the use of housing choice vouchers with public and private resources to help eligible families achieve economic independence. The program is open to families participating in the housing choice voucher program who are unemployed or underemployed. The objective of the program is to assist these families in obtaining employment that will allow them to become self-sufficient, that is, not dependent on welfare assistance.

Participation in the FSS program is voluntary for families and is open to current housing choice voucher program participants. Families entering the FSS program work with a case manager to develop goals that will, over a 5-year period, lead to self-sufficiency. These goals may include education, specialized training, job readiness and job placement activities, and career advancement objectives. Goals for each participating family member are set out in Individual Training and Services plans that are attached to the FSS contract of participation. When the family meets its goals and completes its FSS contract, the family becomes eligible to receive funds deposited in an escrow account on its behalf throughout the family's participation in the FSS program. The amount credited to the family's escrow account is based on increases in the family's earned income during the term of the FSS contract.

FSS program success can be broadly defined, encompassing both the number of participating families who achieve self-sufficiency and the number of family members who are helped to:

- Obtain a first job or obtain a higher paying job;
- Gain independence from public assistance;
- Obtain a high school diploma or higher education degree; or
- Accomplish similar goals that will assist the family in obtaining economic independence.

B. PROGRAM REQUIREMENTS: MINIMUM PROGRAM SIZE

The minimum housing choice voucher FSS program size for a housing agency is equal to:

- The number of certificate and/or voucher units awarded under the FSS incentive award competition in FY 1991/92, *plus*
- The number of additional certificate and voucher units reserved between FY 1993 and October 20, 1998, which was 99 for BHA (excluding renewal funding for units previously reserved), *minus*
- The number of families who have graduated from the PHA's rental certificate or housing choice voucher FSS program on or after October 20, 1998 by fulfilling their contracts of participation.

The FSS obligation applies to all new, non-renewal funding received during this period, unless the funding has been provided specifically for families affected by:

- Termination, expiration, or owner opt-out of project-based Section 8 contracts;
- Demolition, disposition, replacement of public housing, or voluntary conversions of public housing;
- Conversion of a Section 23 project;
- Sale of a HUD-owner project;
- Prepayment of a mortgage or voluntary termination of mortgage insurance. The minimum program size refers to the number of families the PHA is required to enroll and graduate from the FSS program. Each time a family fulfills its FSS contract (on or after October 20, 1998) and “graduates” from the program, the PHA’s minimum program size is decreased by one slot. If a family leaves the program but does not complete its obligations under the contract of participation, the vacated slot must be filled by another eligible family. Mandatory minimum program size but must amend its FSS action plan to reflect the larger program size.

C. Coordinating Committee

PHAs are required to establish Program Coordinating Committees (PCCs) to assist in securing commitments from public and private resources to operate the FSS program.

The PCC should also assist the PHA in the development of the FSS action plan and in program implementation.

PCC membership must include PHA representatives and housing choice voucher program participants or public housing residents. A PHA may use the same PCC for both its public housing and housing choice voucher FSS programs. PCC members should include also representatives from:

- Local government
- Local job training programs funded by the Federal Department of Labor (DOL), and
- Other service organizations, including employment agencies, public child welfare agencies, public/private education or training institutions, child care providers, non-profit service providers, and private businesses.

Representatives from service organizations, civic groups, government agencies, and other community organizations should have the authority to dedicate resources to the FSS program. If the person who has the authority to commit resources does not have the time to participate in FSS activities, it may be wise to include an additional member of the organization.

An existing group may be used as the PCC if the membership of that entity is drawn from appropriate organizations. Neighboring PHAs may also use the same PCC.

D. Program Administration

Selection of Participants

Only current housing choice voucher program participants are eligible to participate in the housing choice voucher FSS program.

HACB will select families without preferences, HACB will conduct an objective selection system such as:

- A lottery;
- The length of time the family has lived in subsidized housing;
- The date the family expressed interest in FSS. The PHA may screen families for interest and motivation to participate in the FSS program.

Permitted screening includes requiring attendance at FSS orientation sessions or interviews or assigning tasks which indicate willingness to undertake FSS obligations (e.g., contacting job training or educational program referrals).

Public housing agencies may not screen based on a family's educational level, test results, previous job history or job performance, credit rating, marital status, number of children, skills, or any other factors which may discriminate against persons with disabilities or other minority or non-minority groups.

E. THE CONTRACT OF PARTICIPATION

FSS requires execution of the FSS Contract of Participation (form HUD-52650) between the HACB and the head of the participating FSS family. The head of the FSS family must be the head of household for eligibility and rent determination purposes. The contract specifies the obligations of each party. An Individual Training and Services Plan (ITSP) is attached to the contract, and lists the services to be provided to each participating family member, the activities to be completed by the family member, and the agreed-upon completion dates of the services and activities. The ITSP establishes specific interim and final goals by which the PHA and the family can measure the family's progress toward self-sufficiency. For all FSS families there is a required interim goal of receiving no welfare assistance for the 12 months before the FSS contract is completed. The contract also requires that the family comply with its lease with the owner.

The contract of participation must be executed no more than 120 days after the household's most recent annual or interim reexamination. If more than 120 days have passed since the last reexamination, a new reexamination must be completed. The contract lists the family's current annual income, the amount of earned income, included in the annual income and the family's total tenant payment when the family begins its FSS participation. During the term of the contract, increases in earned income and total tenant payment are compared to the amounts listed in calculating escrow credits. The contract is effective the first of the month after execution of the contract of participation.

Term of Contract

The initial term of the contract of participation is five years. The PHA may grant an extension of no more than two years in response to a written request from the family explaining the need for the extension, if the PHA determines that there is good cause for granting the extension. "Good cause" includes circumstances beyond the control of the family such as:

- Serious illness, or
- Involuntary loss of employment.

HACB may also extend the contract of participation to allow a family time to meet its required interim goal of remaining off welfare for 12 consecutive months.

The contract is considered to be completed, and a family's FSS participation is concluded, when:

- The family has fulfilled all of its obligations under the contract *on or before the expiration of the contract*; or
- 30 percent of the monthly adjusted income equals or exceeds the published FMR for the family unit size under the PHA's subsidy standards. (To claim its escrow, no family member can be receiving welfare as defined by the FSS regulations, but the 12 consecutive months requirement does not apply.)
- Although successful completion of the contract requires that no member of the family be receiving welfare assistance, the family may still receive rental assistance at the time of and after the family's successful completion the FSS program.

Individual Training and Service Plans

Every FSS contract must include a training and service plan for the head of the family that commits the family head to seek and maintain suitable employment. The training plan should include clearly stated goals with specific deadlines. Other family members can also have individual training and service plans. Exhibit 23-1, *Family Self-Sufficiency Program Individual Training and Services Plan* provides a sample training and services plan.

For families currently receiving welfare assistance, the interim goals must include independence from welfare assistance for at least 12 consecutive months before the expiration of the contract of participation. Although the head of the family is required to seek and maintain employment during the term of the contract, it is permissible for the head to attend school full-time prior to the search for employment. There is no minimum employment period.

Prior to execution of the contract of participation, the PHA must determine if employment goals proposed for inclusion in the individual training and services plans are appropriate goals considering the participant's skills, interests, education, and the jobs available in the local market.

FSS employment objectives should generally include jobs with growth potential. Training and service plans should be reviewed regularly with the family and changed as necessary to reflect new interests and circumstances.

Contract Modifications

The contract language may be modified by the PHA to delete reference to termination of the housing choice voucher assistance for a family's failure to comply with the FSS contract.

The PHA may modify the contract of an FSS family by mutual agreement with the family to:

- Amend the Individual Training and Services Plan;
- Extend the contract term for up to two years; or
- Change the head of the family if the designated head moves and leaves family members in the assisted unit.

HACB may find it necessary to modify a family's contract of participation if a social service agency fails to deliver supportive services pledged under the family's ITSP. If that service or another can be provided by another agency, the PHA should make a good-faith effort to secure services elsewhere. If the services cannot be obtained from another agency, the PHA must determine whether the services are necessary for the family's advancement toward selfsufficiency.

If the services are not necessary, they can be deleted from the ITSP. If the services are necessary, HACB may be forced to declare the contract null and void. Nullification of the contract when services are unavailable will not be grounds for termination of the family's rental assistance.

Termination of Contract

The FSS contract of participation is automatically terminated when the family's housing choice voucher assistance is terminated in accordance with HUD requirements. The contract may also be terminated by:

- Mutual consent;
- Failure of the family to honor the terms of the contract;
- The family's withdrawing from the FSS program;
- Any other act deemed inconsistent with the purpose of the FSS; or
- Operation of law.

HACB will follow the grievance procedures already established in this policy for any family wishing to grieve a PHA decision relating to the family's FSS participation.

Terminating Housing Choice Voucher Program Assistance

HACB may terminate housing choice voucher assistance and/or withhold services for families who fail without good cause to comply with the terms of the FSS contract. However, terminating assistance is likely to have a negative impact on HACB ability to enroll additional families in the FSS program and the HACB will not terminate housing choice voucher assistance for failure to comply with an FSS contract.

F. FSS Escrow Accounts

The FSS program provides for the establishment of an escrow account. The full amount of the escrow account in excess of any amount owed to the PHA becomes available to the family when it has fulfilled its obligations under the contract of participation and has certified that no family member is receiving welfare assistance. The amount of the escrow credit is based on increases in the family's total tenant payment resulting from increases in the family's *earned* income during the term of the FSS contract.

Escrow Account Credit Calculations

As a family's income increases, the PHA calculates rent and the family pays increased rent, as does any other subsidized tenant. The PHA then makes deposits to an escrow account in the appropriate amount based on one of two formulas, one for very low-income families and one for low-income families.¹

¹ Very low-income families are families whose annual incomes are at or below 50% of the median income for the area. Low-income families are those with annual income between 50% and 80% of the area median income.

For very low-income housing choice voucher households, the FSS credit is the lesser of:

- 30 percent of the family's current monthly adjusted income less the total tenant payment (TTP) which is obtained by disregarding any increase in earned income from the effective date of the contract of participation; or
- The current TTP less the TTP on the effective date of the contract of participation.

For low-income housing choice voucher families, the FSS credit is calculated in the same manner but may not exceed the amount that would result if the family income were equal to 50 percent of median income.

Families whose income goes above the low income limit (above 80% of median) will not receive any escrow credit, but may continue as participants in the FSS program until:

- End of participation in the housing choice voucher program;
- The expiration of their contracts of participation;
- All contract obligations have been completed; or
- 30% of their adjusted income equals or exceeds the published FMR for the family unit size under HACB's subsidy standards.

HACB will compute escrow credit at any time it conducts an annual or interim reexamination of income for an FSS family during the term of the contract of participation. All increases in a family's earned income, even increases resulting from changes in family status, are included in the escrow calculation. Examples of changes in family status that might result in an increase in earned income are:

- A family member with earned income is added to the household through marriage.
- An employed family member turns 18. Earned income is defined as:
- The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services;
- The net income from the operation of a business or profession; and
- All regular pay, special pay, and allowances of a member of the Armed Forces (except special pay to a family member exposed to hostile fire).

Because the escrow is based on the total tenant payment (TTP) resulting from increases in earned income, there is no escrow credit if current TTP is less than the TTP at execution of the contract of participation. Increases in income that are not earned income do not result in an escrow credit. Furthermore, the escrow credit is based on increases in TTP the family pays; therefore, there is no escrow credit earned if a family fails to pay its rent.

For families who have converted to the FSS program from project self-sufficiency or operation bootstrap, the figures included in the contract of participation for annual income, earned income and TTP are based on family circumstances on the effective date of the FSS contract.

If an FSS family has fraudulently underreported income and the PHA decides not to terminate assistance, the family's escrow credit is based on the lower rent originally calculated.

Establishing Escrow Accounts

FSS escrow funds must be deposited into a single, interest-bearing depository account. The accounting for these funds should be supported through a subsidiary ledger that records the balance of each individual FSS participant's account.

Investment income must be credited periodically, but no less than annually, to each participating family's ledger account based on the balance in each account at the end of the period for which the investment income is prorated. If the PHA has information that the family owes the owner for unpaid rent or other amounts due, the amount credited to the family's account should be reduced by the amount owed.

The HACB must report to the family at least annually on the escrow account including:

- The balance at the beginning of the reporting period;
- The amount credited during the period;
- Any deductions made from the account for amounts due the PHA before interest was distributed;
- The amount of interest earned on the account; and
- The total in the account at the end of the reporting period.

G. Disbursement of FSS Account Funds

A family is eligible to receive its escrow account:

- When it has completed all of its obligations under the contract of participation and the head of the family certifies that no family member has received welfare assistance for the previous 12 months; or
- When 30% of its adjusted income equals or exceeds the FMR for the family, the family will be considered to have completed all of its obligations even though family members have not completed all the activities in their ITSP. In this circumstance, the head of the family must certify that no family member is receiving welfare, but the requirement to have been off welfare assistance for a year does not apply.

The escrow payment is the amount in the family's escrow account, less any amount owed to the HACB. Before disbursement of the escrow account funds to the family, HACB may verify that the family no longer receives welfare assistance.

For the FSS program only, welfare assistance is defined as income assistance from federal or state welfare programs and includes only cash maintenance payments designed to meet a family's ongoing basic needs. Welfare assistance does not include:

- Nonrecurring, short-term benefits that are designed to deal with a specific crisis, are not intended to meet ongoing needs, and will not extend beyond four months;
- Work subsidies (e.g., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision and training);
- Supportive services (such as child care and transportation), provided to families who are employed;
- Refundable earned-income tax credits;
- Contributions to, and distributions from, Individual Development Accounts under TANF;
- Services that do not provide basic income support such as counseling or case management;
- Transportation benefits provided under a Job Access or Reverse Commute project to an individual who is not otherwise receiving assistance;
- Amounts solely directed to meeting housing expenses;
- Amounts for health care;
- Food stamps and emergency rental and utilities assistance; and
- SSI, SSDI, or Social Security.

If the original head of household no longer resides with the FSS family, the family may designate another family member to receive the escrow account funds.

Interim Disbursement of Escrow Funds

The HACB may allow the family to receive a portion of its escrow funds early, if the HACB determines that the family has fulfilled established interim goals and requires a portion of the FSS escrow account funds for purposes consistent with the contract of participation.

Before agreeing to an early disbursement, the HACB may prefer to help the family seek other sources for the funds needed so that the escrow account will not be depleted.

If the family does not complete its FSS contract, the family is not required to repay the amount received as an interim disbursement unless the advance payment was made based on fraudulent information from the family. Early disbursement of escrow funds may be allowed for the following reasons:

- Completion of college or graduate school, job training;
- Start-up expenses involved in the creation of a small business;
- The purchase of an automobile for transportation to work; or
- Purchase of a home.

Forfeiture of Escrow Accounts

An FSS family will forfeit its escrow account if the contract of participation is terminated, if the family is still receiving welfare at the expiration of the contract term, or if the contract obligations have not been completed because the head of the FSS family did not become employed.

When a family's escrow account is forfeited, the funds in that account are returned to the PHA's general accounts and treated as additional program receipts for payment of approved program expenses such as housing assistance payments under the PHA budget.

H. PORTABILITY OF FAMILY SELF-SUFFICIENCY

A family participating in the FSS program is generally required to lease a unit in the community issuing the housing choice voucher for a minimum of 12 months after the effective date of the contract of participation. HACB can, however, approve a move out of the community during the first year for good cause. After the first year, the family may move to a unit in another community so long as it has complied with the terms of the existing lease.

Some relocating families will continue participating in the FSS program of the HACB; others may be admitted to the FSS program at the receiving PHA. To continue with the initial PHA's program, the family must demonstrate to the satisfaction of the HACB that it will be able to fulfill its responsibilities under the initial or a modified contract of participation.

The relocating family may participate in the receiving PHA's FSS program if it is admitted to the program by the receiving PHA. If the family is admitted to the receiving PHA's FSS program, the receiving PHA will enter into a new contract of participation with the FSS family for the remaining time in the family's initial contract. When it prepares the new FSS contract, the receiving PHA must use the initial income and rent information from the contract executed when the family first began its FSS participation.

The HACB will maintain the FSS escrow account until/unless the receiving PHA absorbs the family into its housing choice voucher program. If the receiving PHA absorbs the family, the HACB will transfer the family's FSS account to the receiving PHA.

If the FSS family fails to fulfill its FSS contract obligations after moving to another jurisdiction, the PHA which executed the contract of participation may terminate the family from the FSS program and has the option of terminating the family's housing choice voucher assistance. If the family fails to complete its obligations under the contract of participation, the escrow funds will be treated as program receipts of the PHA maintaining the account.

The PHA administrative plan should address the PHA's policy toward FSS families wishing to relocate *into* the PHA's jurisdiction. For all voucher holders, the plan must state whether the agency will absorb a family from another jurisdiction or administer the unit for the initial PHA.

For FSS families, the PHA's policies should also address whether the PHA will provide selection preference in its FSS program for portable FSS families.

XVI. Termination of Assistance and Tenancy

HUD regulations specify the reasons for which HACB can terminate a family's assistance, and the ways in which such terminations must take place. They also dictate the circumstances under which an owner may terminate the tenancy of an assisted family. This chapter presents the policies that govern voluntary and involuntary terminations of assistance, and termination of tenancy by the owner. It is presented in three parts:

- A: Grounds for Termination of Assistance. This part discusses various reasons that a family's assistance may be terminated, including voluntary termination by the family, termination because the family no longer qualifies to receive subsidy, and termination by HACB based on the family's failure to comply with program requirements.
- B: Approach to Termination of Assistance. This part describes the policies that govern how an involuntary termination takes place. It specifies the alternatives that HACB may consider in lieu of termination, the criteria HACB must use when deciding what action to take, and the steps HACB must take when terminating a family's assistance.
- C: Termination of Tenancy by the Owner. This part presents the policies that govern the owner's right to terminate an assisted tenancy.

A. Grounds for Termination of Assistance

1. OVERVIEW

HUD requires HACB to terminate assistance for certain offenses and when the family no longer requires assistance. HUD permits HACB to terminate assistance for certain other actions family members take or fail to take. In addition, a family may decide to stop receiving HCV assistance at any time by notifying HACB.

2. FAMILY NO LONGER REQUIRES ASSISTANCE [24 CFR 982.455]

As a family's income increases, the amount of PHA subsidy goes down. If the amount of HCV assistance provided by HACB drops to zero and remains at zero for 180 consecutive days the family's assistance terminates automatically.

If a participating family receiving zero assistance experiences a change in circumstances that would cause the HAP payment to rise above zero, the family must notify HACB of the changed circumstances and request an interim reexamination before the expiration of the 180-day period.

3. FAMILY CHOOSES TO TERMINATE ASSISTANCE

The family may request that HACB terminate the family's assistance at any time.

The request to terminate assistance should be made in writing and signed by the head of household, spouse, co-head, conservator, or person with power of attorney. Before terminating the family's assistance, HACB will follow the notice requirements.

4. MANDATORY TERMINATION OF ASSISTANCE

HUD requires HACB to terminate assistance in the following circumstances.

Eviction [24 CFR 982.552(b)(2)]

HACB must terminate assistance whenever a family is evicted from a unit assisted under the HCV program for a serious or repeated violation of the lease and a judgment for possession of the unit is entered in a court of competent jurisdiction.

A family will be considered *evicted* if the family moved after a legal eviction judgment of possession for the owner or his or her management agent has been entered by a court of competent jurisdiction, regardless of whether the judgment was executed upon by a marshal.

If a family moves after the initiation of an eviction action for serious or repeated lease violations and prior judgment, the termination of assistance is not mandatory. **However**, HACB will determine whether the family has committed serious or repeated violations of the lease based on available evidence and may terminate assistance or take any of the alternative measures described in Section 12-II.C.

Serious and repeated lease violations will include, but not be limited to, nonpayment of rent, disturbance of neighbors, destruction of property, or living or housekeeping habits that cause damage to the unit or premises and criminal activity. Generally, the criteria to be used are whether or not the reason for the eviction was through no fault of the tenant or guests.

A family member is subject to a lifetime registration requirement under a state sex offender registration program

Failure to Provide Consent [24 CFR 982.552(b)(3)]

HACB will terminate assistance if any family member fails to sign and submit any consent form they are required to sign for a reexamination.

Failure to Document Citizenship [24 CFR 982.552(b)(4) and [24 CFR 5.514(c)]

HACB will terminate assistance if (1) a family fails to submit required documentation within the required timeframe concerning any family member's citizenship or immigration status; (2) a family submits evidence of citizenship and eligible immigration status in a timely manner, but United States Citizenship and Immigration Services (USCIS) primary and secondary verification does not verify eligible immigration status of the family; or (3) a family member, as determined by HACB, has knowingly permitted another individual who is not eligible for assistance to reside (on a permanent basis) in the unit.

For (3) above, such termination will be for a period of at least 24 months. This does not apply to ineligible noncitizens already in the household where the family's assistance has been prorated.

Failure to Provide Social Security Documentation [24 CFR 5.218(c)]

HACB will terminate assistance if a participant family fails to provide the documentation or certification required for any family member who obtains a social security number, joins the family, or reaches 6 years of age.

Methamphetamine Manufacture or Production [24 CFR 982.553(b)(1)(ii)]

HACB will terminate assistance if any household member has ever been convicted of the manufacture or production of methamphetamine on the premises of federally-assisted housing.

5. MANDATORY POLICIES AND OTHER AUTHORIZED TERMINATIONS

Mandatory Policies [24 CFR 982.553(b) and 982.551(l)]

HUD requires HACB to establish policies that permit HACB to terminate assistance if the PHA determines that:

- Any household member is currently engaged in any illegal use of a drug, or has a pattern of illegal drug use that interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents
- Any household member's abuse or pattern of abuse of alcohol may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents
- Any household member has violated the family's obligation not to engage in any drug-related criminal activity
- Any household member has violated the family's obligation not to engage in violent criminal activity

Use of Illegal Drugs and Alcohol Abuse

HACB will terminate a family's assistance if any household member is currently engaged in any illegal use of a drug, or has a pattern of illegal drug use that interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents.

HACB will terminate assistance if any household member's abuse or pattern of abuse of alcohol threatens the health, safety, or right to peaceful enjoyment of the premises by other residents.

Currently engaged in is defined as any use of illegal drugs during the previous six months.

HACB will consider all credible evidence, including but not limited to, any record of arrests, convictions, or eviction of household members related to the use of illegal drugs or abuse of alcohol.

In making its decision to terminate assistance, HACB will consider alternatives as described in policies. Upon consideration of such alternatives and factors, HACB may, on a case-by-case basis, choose not to terminate assistance.

Drug-Related and Violent Criminal Activity [24 CFR 5.100]

Drug means a controlled substance as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802).

Drug-related criminal activity is defined by HUD as the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug.

Violent criminal activity means any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage.

HACB will terminate a family's assistance if any household member has violated the family's obligation not to engage in any drug-related or violent criminal activity during participation in the HCV program.

HACB will consider all credible evidence, including but not limited to, any record of arrests and/or convictions of household members related to drug-related or violent criminal activity, and any eviction or notice to evict based on drug-related or violent criminal activity.

In making its decision to terminate assistance, HACB will consider alternatives as described in policies. Upon consideration of such alternatives and factors, HACB may, on a case-by-case basis, choose not to terminate assistance.

Other Authorized Reasons for Termination of Assistance [24 CFR 982.552(c)]

HACB will not terminate a family's assistance because of the family's failure to meet its obligations under the Family Self-Sufficiency or Welfare to Work voucher programs.

- HACB will terminate a family's assistance if:
- The family has failed to comply with any family obligations under the program. See Exhibit 12-1 for a listing of family obligations and related PHA policies.
- Any family member has been evicted from federally-assisted housing in the last five years.
- Any PHA has ever terminated assistance under the program for any member of the family.
- Any family member has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program.
- The family currently owes rent or other amounts to any PHA in connection with the HCV, Certificate, Moderate Rehabilitation or public housing programs.
- The family has not reimbursed any PHA for amounts HACB paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease.
- The family has breached the terms of a repayment agreement entered into with HACB.
- A family member has engaged in or threatened violent or abusive behavior toward PHA personnel.

Abusive or violent behavior towards PHA personnel includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.

Threatening refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.

Actual physical abuse or violence will always be cause of termination

In making its decision to terminate assistance, HACB will consider alternatives as described in policies. Upon consideration of such alternatives and factors, HACB may, on a case-by-case basis, choose not to terminate assistance.

Family Absence from the Unit [24 CFR 982.312]

Absence in this context means that no member of the family is residing in the unit.

If the family is absent from the unit for more than 180 consecutive days, the family's assistance will be terminated. Notice of termination will be sent in accordance with policies.

Terminate for Misrepresentation [24 CFR 982.551, 982.552(c)]

If the family has misrepresented any facts that caused HACB to overpay assistance, HACB may choose not to terminate and may offer to continue assistance provided that the family executes a Repayment Agreement and makes payments in accordance with the agreement or reimburses HACB in full within 30 days.

Misrepresentation in Collusion with Owner [24 CFR 982.551, 982.552 (c)]

If the family intentionally, willingly, and knowingly commits fraud or is involved in any other illegal scheme with the owner, HACB will deny or terminate assistance. In making this determination, HACB will carefully consider the possibility of overt or implied intimidation of the family by the owner and the family's understanding of the events.

Missed Appointments and Deadlines [24 CFR 982.551, 982.552 (c)]

It is a Family Obligation to supply information, documentation, and certification as needed for HACB to fulfill its responsibilities. HACB schedules appointments and sets deadlines in order to obtain the required information. The Obligations also require that the family allow HACB to inspect the unit, and appointments are made for this purpose.

An applicant or participant who fails to keep an appointment, or to supply information required by a deadline without notifying HACB, may be sent a Notice of Denial or Termination of Assistance for failure to provide required information, or for failure to allow HACB to inspect the unit.

The family will be given information about the requirement to keep appointments and the number of times appointments will be rescheduled, as specified in this Plan. Appointments will be scheduled and time requirements will be imposed for the following events and circumstances:

- Eligibility for Admissions
- Verification Procedures
- Voucher Issuance and Briefings
- Housing Quality Standards and Inspections
- Recertifications
- Appeals

Acceptable reasons for missing appointments or failing to provide information by deadlines are:

- Medical emergency
- Family emergency

Procedure when Appointments are Missed or Information not Provided

For most purposes in this Plan, the family will be given two (2) opportunities before being issued a notice of termination or denial for breach of a family obligation.

After issuance of the termination notice, if the family offers to correct the breach within the time allowed to request a hearing, the notice will be rescinded by the Director or designee if the family offers to cure and the family does not have a history of non-compliance.

Lapse of Time /No Lease and Contract

A HCV participant household who is eligible for continued assistance must not allow more than 180 days to lapse since their last assisted lease and contract. If the HCV participant family fails to lease an eligible unit and thus no HAP contract has been executed for this household within the 180 days of their last assisted lease and contract the household shall be terminated from the HCV program. Any authorization of additional time to locate an eligible unit or to utilize the HCV rental assistance must be authorized by the Director.

All notices of termination must provide the family with an opportunity to request a hearing prior to any termination of assistance.

Insufficient Funding [24 CFR 982.454]

HACB will determine whether there is sufficient funding to pay for currently assisted families according to the policies. If HACB determines there is a shortage of funding, prior to terminating any HAP contracts, HACB will determine if any other actions can be taken to reduce program costs. If after implementing all reasonable cost cutting measures there is not enough funding available to provide continued assistance for current participants, HACB will terminate HAP contracts as a last resort.

Prior to terminating any HAP contracts, HACB will inform the local HUD field office. HACB will terminate the minimum number needed in order to reduce HAP costs to a level within HACB's annual budget authority.

B. Approach to Termination of Assistance

1. OVERVIEW

HACB is required by regulation to terminate a family's assistance if certain program rules are violated. For other types of offenses, the regulations give HACB the discretion to either terminate the family's assistance or to take another action. This part discusses the various actions HACB may choose to take when it has discretion, and outlines the criteria HACB will use to make its decision about whether or not to terminate assistance. It also specifies the requirements for the notice that must be provided before terminating assistance.

2. METHOD OF TERMINATION [24 CFR 982.552(a)(3)]

The way in which HACB terminates assistance depends upon individual circumstances. HUD permits HACB to terminate assistance by:

- Terminating housing assistance payments under a current HAP contract,
- Refusing to approve a request for tenancy or to enter into a new HAP contract, or
- Refusing to process a request for or to provide assistance under portability procedures.

3. ALTERNATIVES TO TERMINATION OF ASSISTANCE

Change in Household Composition [24 CFR 982.552(c)(2)(ii)].

As a condition of continued assistance, the head of household must certify that the culpable family member has vacated the unit and will not be permitted to visit or to stay as a guest in the assisted unit. The family must present evidence of the former family member's current address upon HACB request.

Repayment of Family Debts

If a family owes amounts to HACB, as a condition of continued assistance, HACB will require the family to repay the full amount or to enter into a repayment agreement, within 30 days of receiving notice from HACB of the amount owed. See policies on repayment agreements.

4. CRITERIA FOR DECIDING TO TERMINATE ASSISTANCE

Evidence

HACB will use the concept of the preponderance of the evidence as the standard for making all termination decisions regardless of whether the household member has been arrested or convicted.

Preponderance of the evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not. Preponderance of the evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

Consideration of Circumstances [24 CFR 982.552(c)(2)(i)]

HACB will consider the following factors when making its decision to terminate assistance:

- The seriousness of the case, especially with respect to how it would affect other residents
- The effects that termination of assistance may have on other members of the family who were not involved in the action or failure
- The extent of participation or culpability of individual family members, including whether the culpable family member is a minor or a person with disabilities

- The length of time since the violation occurred, the family's recent history and the likelihood of favorable conduct in the future
- In the case of drug or alcohol abuse, whether the culpable household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program or has otherwise been rehabilitated successfully
- HACB will require the participant to submit evidence of the household member's current participation in or successful completion of a supervised drug or alcohol rehabilitation program, or evidence of otherwise having been rehabilitated successfully.
- In the case of program abuse, the dollar amount of the overpaid assistance and whether or not a false certification was signed by the family.

Reasonable Accommodation [24 CFR 982.552(c)(2)(iv)]

If the family includes a person with disabilities, HACB's decision to terminate the family's assistance is subject to consideration of reasonable accommodation in accordance with 24 CFR Part 8.

If a family indicates that the behavior of a family member with a disability is the reason for a proposed termination of assistance, HACB will determine whether the behavior is related to the disability. If so, upon the family's request, HACB will determine whether alternative measures are appropriate as a reasonable accommodation. HACB will only consider accommodations that can reasonably be expected to address the behavior that is the basis of the proposed termination of assistance.

5. TERMINATION NOTICE [HCV GB, p. 15-7]

If a family's assistance is to be terminated, whether voluntarily or involuntarily, HACB will give the family and the owner written notice that specifies:

- The reasons for which assistance has been terminated
- The effective date of the termination
- The family's right to an informal hearing

If a criminal record is the basis of the termination, a copy of the record must accompany the notice. A copy of the criminal record also must be provided to the subject of the record [24 CFR 982.553(d)].

When termination is initiated by HACB, the notice to terminate will be sent to the family and the owner at least 30 days prior to the effective date of the termination. However, if a family vacates the unit without informing HACB, 30 days notice will not be given. In these cases, the notice to terminate will be sent at the time HACB learns the family has vacated the unit.

When a family requests to be terminated from the program they must do so in writing to HACB. HACB will then send a confirmation notice to the family and the owner within 10 business days of the family's request, but no later than the termination effective date (as requested by the family).

Notice of Termination Based on Citizenship Status [24 CFR 5.514 (c) and (d)]

HACB will terminate assistance if (1) a family fails to submit required documentation within the required timeframe concerning any family member's citizenship or eligible immigration status; (2) evidence of citizenship and eligible immigration status is submitted timely, but USCIS primary and secondary verification does not verify eligible immigration status of a family; or (3) HACB determines that a family member has knowingly permitted another individual who is not eligible for assistance to reside (on a permanent basis) in the unit. For (3) above, such termination must be for a period of at least 24 months.

The notice of termination will advise the family of the reasons their assistance is being terminated, that they may be eligible for proration of assistance, the criteria and procedures for obtaining relief under the provisions for preservation of families, that they have the right to request an appeal to the USCIS of the results of secondary verification of immigration status and to submit additional documentation or a written explanation in support of the appeal, and that they have the right to request an informal hearing with HACB either upon completion of the USCIS appeal or in lieu of the USCIS appeal. Informal hearing procedures are contained in this policy.

The notice to terminate will be sent to the family and the owner at least 30 days prior to the effective date of the termination.

6. HOW TERMINATION OF ASSISTANCE AFFECTS THE HAP CONTRACT AND LEASE

When the family's assistance is terminated, the lease and HAP contract terminate automatically [Form HUD-52641].

The owner may offer the family a separate unassisted lease [HCV GB, p. 15-8].

C. Termination of Tenancy by the Owner

1. OVERVIEW

Termination of an assisted tenancy is a matter between the owner and the family; HACB is not directly involved. However, the owner is under some constraints when terminating an assisted tenancy and the reasons for which a tenancy is terminated dictate whether assistance also will be terminated.

2. GROUNDS FOR OWNER TERMINATION OF TENANCY [24 CFR 982.310 and Form HUD-52641-A, Tenancy Addendum]

During the term of the lease, the owner is not permitted to terminate the tenancy except for serious or repeated violations of the lease, certain violations of state or local law, or other good cause.

Serious or Repeated Lease Violations

The owner is permitted to terminate the family's tenancy for serious or repeated violations of the terms and conditions of the lease. This includes failure to pay rent or other amounts due under the lease. However, HACB's failure to make a HAP payment to the owner is not a violation of the lease between the family and the owner.

Violation of Federal, State, or Local Law

The owner is permitted to terminate the tenancy if a family member violates federal, state, or local law that imposes obligations in connection with the occupancy or use of the premises.

Criminal Activity or Alcohol Abuse

The owner may terminate tenancy during the term of the lease if any *covered person*, meaning any member of the household, a guest or another person under the tenant's control commits any of the following types of criminal activity (for applicable definitions see 24 CFR 5.100):

- Any criminal activity that threatens the health or safety of, or the right to peaceful enjoyment of the premises by, other residents (including property management staff residing on the premises);
- Any criminal activity that threatens the health or safety of, or the right to peaceful enjoyment of their residences by, persons residing in the immediate vicinity of the premises;
- Any violent criminal activity on or near the premises; or
- Any drug-related criminal activity on or near the premises.

The owner may terminate tenancy during the term of the lease if any member of the household is:

- Fleeing to avoid prosecution, custody, or confinement after conviction for a crime or an attempt to commit a crime that is a felony under the laws of the place from which the individual flees, or that, in the case of the State of New Jersey, is a high misdemeanor; or
- Violating a condition of probation or parole imposed under federal or state law.

The owner may terminate tenancy for criminal activity by a household member in accordance with this section if the owner determines that the household member has committed the criminal activity, regardless of whether the household member has been arrested or convicted for such activity.

The owner may terminate tenancy during the term of the lease if any member of the household has engaged in abuse of alcohol that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents.

Evidence of Criminal Activity

The owner may terminate tenancy and evict by judicial action a family for criminal activity by a covered person if the owner determines they have engaged in the criminal activity, regardless of arrest or conviction and without satisfying the standard of proof used for a criminal conviction.

Other Good Cause

During the initial lease term, the owner may not terminate the tenancy for “other good cause” unless the owner is terminating the tenancy because of something the family did or failed to do. During the initial lease term or during any extension term, other good cause includes the disturbance of neighbors, destruction of property, or living or housekeeping habits that cause damage to the unit or premises.

After the initial lease term, “other good cause” for termination of tenancy by the owner includes:

- Failure by the family to accept the offer of a new lease or revision;
- The owner's desire to use the unit for personal or family use, or for a purpose other than as a residential rental unit; or
- A business or economic reason for termination of the tenancy (such as sale of the property, renovation of the unit, or desire to lease the unit at a higher rent).

After the initial lease term, the owner may give the family notice at any time, in accordance with the terms of the lease.

3. EVICTION [24 CFR 982.310(e) and (f) and Form HUD-52641-A, Tenancy Addendum]

The owner must give the tenant a written notice that specifies the grounds for termination of tenancy during the term of the lease. The tenancy does not terminate before the owner has given this notice, and the notice must be given at or before commencement of the eviction action.

The notice of grounds may be included in, or may be combined with, any owner eviction notice to the tenant.

Owner eviction notice means a notice to vacate, or a complaint or other initial pleading used under state or local law to commence an eviction action. The owner may only evict the tenant from the unit by instituting a court action. The owner must give HACB a copy of any eviction notice at the same time the owner notifies the family. The family is also required to give HACB a copy of any eviction notice.

If the eviction action is finalized in a court of competent jurisdiction, , with judgment of possession entering for the Owner, the owner must provide HACB with documentation related to the eviction, including notice of the eviction date, as soon as possible, but no later than 10 business days following the court-ordered eviction.

4. DECIDING WHETHER TO TERMINATE TENANCY [24 CFR 982.310(h)]

An owner who has grounds to terminate a tenancy is not required to do so, and may consider all of the circumstances relevant to a particular case before making a decision. These might include:

- The seriousness of the offending action;
- The effect on the community of the termination, or of the owner's failure to terminate the tenancy;
- The extent of participation by the leaseholder in the offending action;
- The effect of termination of tenancy on household members not involved in the offending activity;
- The demand for assisted housing by families who will adhere to lease responsibilities;
- The extent to which the leaseholder has shown personal responsibility and taken all reasonable steps to prevent or mitigate the offending action;
- The effect of the owner's action on the integrity of the program.

The owner may require a family to exclude a household member in order to continue to reside in the assisted unit, where that household member has participated in or been culpable for action or failure to act that warrants termination.

In determining whether to terminate tenancy for illegal use of drugs or alcohol abuse by a household member who is no longer engaged in such behavior, the owner may consider whether such household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program, or has otherwise been rehabilitated successfully (42 U.S.C. 13661). For this purpose, the owner may require the tenant to submit evidence of the household member's current participation in, or successful completion of, a supervised drug or alcohol rehabilitation program or evidence of otherwise having been rehabilitated successfully.

The owner's termination of tenancy actions must be consistent with the fair housing and equal opportunity provisions in 24 CFR 5.105.

5. EFFECT OF TERMINATION OF TENANCY ON THE FAMILY'S ASSISTANCE

If a termination is not due to a serious or repeated violation of the lease, and if HACB has no other grounds for termination of assistance, HACB may issue a new voucher so that the family can move with continued assistance.

EXHIBIT 12-1: STATEMENT OF FAMILY OBLIGATIONS

Following is a listing of a participant family's obligations under the HCV program:

The term "promptly" when used with the family obligations always means "within 10 business days."

- The family must supply any information that HACB or HUD determines to be necessary, including submission of required evidence of citizenship or eligible immigration status.
- The family must supply any information requested by HACB or HUD for use in a regularly scheduled reexamination or interim reexamination of family income and composition.
- The family must disclose and verify social security numbers and sign and submit consent forms for obtaining information.
- Any information supplied by the family must be true and complete.
- The family is responsible for any Housing Quality Standards (HQS) breach by the family caused by failure to pay tenant-provided utilities or appliances, or damages to the dwelling unit or premises beyond normal wear and tear caused by any member of the household or guest.

Damages beyond normal wear and tear will be considered to be damages that could be assessed against the security deposit.

The inspector will determine if an HQS breach as identified in 24 CFR 982.404 (b) is the responsibility of the family. Families may be given extensions to cure HQS breaches by the Director/Contractor.

- The family must allow HACB to inspect the unit at reasonable times and after reasonable notice, as describe this plan.
- The family must not commit any serious or repeated violation of the lease.

HACB will determine if a family has committed serious or repeated violations of the lease based on available evidence, including but not limited to, a court-ordered eviction, or an owner's notice to evict.

Serious and repeated lease violations will include, but not be limited to, nonpayment of rent, disturbance of neighbors, destruction of property, or living or housekeeping habits that cause damage to the unit or premises and criminal activity. Generally, the criteria to be used is whether the reason for the eviction was through no fault of the tenant or guests.

- The family must notify HACB and the owner before moving out of the unit or terminating the lease.

The family must comply with lease requirements regarding written notice to the owner. The family must provide written notice to HACB at the same time the owner is notified.

- The family must promptly give HACB a copy of any owner eviction notice.

If the family requests assistance to move and they did not notify HACB of an eviction within 10 business days of receiving the Notice of Lease Termination, the move will be denied.

- The family must use the assisted unit for residence by the family. The unit must be the family's only residence.

If HACB determines that the use of the unit as a business is not incidental to its use as a dwelling unit, it will be considered a program violation.

If HACB determines the business is not legal, it will be considered a program violation.

- The composition of the assisted family residing in the unit must be approved by HACB. The family must promptly notify HACB in writing of the birth, adoption, or court-awarded custody of a child. The family must request PHA approval to add any other family member as an occupant of the unit.

The request to add a family member must be submitted in writing and approved by HACB and the owner prior to the person moving into the unit. HACB will determine eligibility of the new member in accordance with the policies. HACB will not approve the addition of a family member if the voucher size increases by more than one (1) bedroom.

HACB will deny a family's request to add additional family members who are:

- Persons who have been evicted from public housing.
 - Persons who commit drug-related criminal activity or violent criminal activity.
 - Persons who currently owe rent or other amounts to HACB or to another • PHA in connection with Section 8 or public housing assistance under the 1937 Act.
 - Persons who have engaged in or threatened abusive or violent behavior toward HACB personnel.
- The family must promptly notify HACB in writing if any family member no longer lives in the unit.

Families are required to notify HACB if any family member leaves the assisted household. When the family notifies HACB, they must furnish the following information:

- The date the family member moved out.
- The new address, if known, of the family member.

- If HACB has given approval, a foster child or a live-in aide may reside in the unit. HACB has the discretion to adopt reasonable policies concerning residency by a foster child or a live-in aide, and to define when PHA consent may be given or denied.
- The family must not sublease the unit, assign the lease, or transfer the unit.

Subleasing includes receiving payment to cover rent and utility costs by a person living in the unit who is not listed as a family member.

- The family must supply any information requested by HACB to verify that the family is living in the unit or information related to family absence from the unit.
- The family must promptly notify HACB when the family is absent from the unit.

Notice is required under this provision only when all family members will be absent from the unit for an extended period. An extended period is defined as any period greater than 30 days. Written notice must be provided to HACB at the start of the extended absence.

- The family must pay utility bills and provide and maintain any appliances that the owner is not required to provide under the lease [Form HUD-52646, Voucher].
- The family must not own or have any interest in the unit, (other than in a cooperative and owners of a manufactured home leasing a manufactured home space).

The owner may not reside in the assisted unit regardless of whether (s)he is a member of the assisted family

- Family members must not commit fraud, bribery, or any other corrupt or criminal act in connection with the program.

In each case, HACB will consider which family members were involved, the circumstances, and any hardship that might be caused to innocent members.

- Family members must not engage in drug-related criminal activity or violent criminal activity or other criminal activity that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises. See HUD and PHA policies related to drug-related and violent criminal activity.

- Members of the household must not engage in abuse of alcohol in a way that threatens the health, safety or right to peaceful enjoyment of the other residents and persons residing in the immediate vicinity of the premises.
- An assisted family or member of the family must not receive HCV program assistance while receiving another housing subsidy, for the same unit or a different unit under any other federal, state or local housing assistance program.
- A family must not receive HCV program assistance while residing in a unit owned by a parent, child, grandparent, grandchild, sister or brother of any member of the family, unless HACB has determined (and has notified the owner and the family of such determination) that approving rental of the unit, notwithstanding such relationship, would provide reasonable accommodation for a family member who is a person with disabilities. [Form HUD-52646, Voucher]

XVII. Program Integrity

INTRODUCTION

HACB is committed to ensuring that subsidy funds made available to HACB are spent in accordance with HUD requirements.

This chapter covers HUD and HACB policies designed to prevent, detect, investigate and resolve instances of program abuse or fraud. It also describes the actions that will be taken in the case of unintentional errors and omissions.

A: Preventing, Detecting, and Investigating Errors and Program Abuse. This part presents HACB policies related to preventing, detecting, and investigating errors and program abuse.

B: Corrective Measures and Penalties. This part describes the corrective measures HACB must and may take when errors or program abuses are found.

A. Preventing, Detecting, and Investigating Errors and Program Abuse

1. Preventing Errors and Program Abuse

HACB anticipates that the vast majority of families, owners, and employees intend to and will comply with program requirements and make reasonable efforts to avoid errors.

To ensure that HACB's HCV program is administered effectively and according to the highest ethical and legal standards, HACB will employ a variety of techniques to ensure that both errors and intentional program abuse are rare:

- HACB will discuss program compliance and integrity issues during the voucher briefing sessions.
- HACB will provide each applicant and participant with the publication *Things You Should Know (HUD-1140-OIG)* that explains the types of actions a family must avoid and the penalties for program abuse.
- HACB will place a warning statement about the penalties for fraud (as described in the False Statement Act, U.S.C. 1001 and 1010) on key HACB forms and form letters that request information from a family or owner.
- HACB staff will be required to review and explain the contents of all HUD- and HACB-required forms prior to requesting family member signatures.
- HACB will provide each employee with the necessary training on program rules and the organization's standards of conduct and ethics.

For purposes of this chapter the term *error* refers to an unintentional error or omission. *Program abuse or fraud* refers to a single act or pattern of actions that constitute a false statement, omission, or concealment of a substantial fact, made with the intent to deceive or mislead.

2. Detecting Errors and Program Abuse

In addition to taking steps to prevent errors and program abuse, HACB will use a variety of activities to detect errors and program abuse.

Quality Control and Analysis of Data

Under the Section 8 Management Assessment Program (SEMAP), HUD requires HACB to review a random sample of tenant records annually to determine if the records conform to program requirements and to conduct quality control inspections of a sample of units to ensure HQS compliance [24 CFR, Part 985].

In addition to the SEMAP quality control requirements, HACB will employ a variety of methods to detect errors and program abuse:

- HACB routinely will use available sources of up-front income verification to compare with family-provided information.
- At each annual reexamination, current information provided by the family will be compared to information provided at the last annual reexamination to identify inconsistencies and incomplete information.
- HACB will compare family-reported income and expenditures to detect possible unreported income.

Independent Audits and HUD Monitoring

HACB will use the results reported in any IPA or HUD monitoring reports to identify potential program abuses as well as to assess the effectiveness of HACB's error detection and abuse prevention efforts.

Individual Reporting of Possible Errors and Program Abuse

HACB will encourage staff, program participants, and the public to report possible program abuse.

3. Investigating Errors And Program Abuse

When HACB Will Investigate

HACB will review all referrals, specific allegations, complaints, and tips from any source including other agencies, companies, and individuals, to determine if they warrant investigation. In order for HACB to investigate, the allegation must contain at least one independently-verifiable item of information, such as the name of an employer or the name of an unauthorized household member.

HACB will investigate inconsistent information related to the family that is identified through file reviews and the verification process.

Consent to Release of Information [24 CFR 982.516]

HACB may investigate possible instances of error or abuse using all available HACB and public records. If necessary, HACB will require HCV families to give consent to the release of additional information.

Analysis and Findings

HACB will base its evaluation on a preponderance of the evidence collected during its investigation.

Preponderance of the evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence that as a whole shows that the fact sought to be proved is more probable than not. Preponderance of evidence may not be determined by the number of witnesses, but by the greater weight of all evidence

For each investigation HACB will determine (1) whether an error or program abuse has occurred, (2) whether any amount of money is owed HACB, and (3) what corrective measures or penalties will be assessed.

Consideration of Remedies

In the case of family-caused errors or program abuse, HACB will take into consideration (1) the seriousness of the offense and the extent of participation or culpability of individual family members, (2) any special circumstances surrounding the case, (3) any mitigating circumstances related to the disability of a family member, (4) the effects of a particular remedy on family members who were not involved in the offense.

In the case of owner-caused errors or program abuse, HACB will take into consideration (1) the seriousness of the offense, (2) the length of time since the violation has occurred, and (3) the effects of a particular remedy on family members who were not involved in the offense.

Notice and Appeals

HACB will inform the relevant party in writing of its findings and remedies within 10 business days of the conclusion of the investigation. The notice will include (1) a description of the error or program abuse, (2) the basis on which HACB determined the error or program abuses, (3) the remedies to be employed, and (4) the family's right to appeal the results through the informal review or hearing process, if applicable.

B. Corrective Measures and Penalties

1. SUBSIDY UNDER- OR OVERPAYMENTS

Corrections

Whether the incorrect subsidy determination is an overpayment or underpayment of subsidy, HACB must promptly correct the HAP, family share, and any utility reimbursement prospectively.

Increases in the family share will be implemented only after the family has received 30 days notice.

Any decreases in family share will become effective the first of the month following the discovery of the error.

Reimbursement

Whether the family or owner is required to reimburse HACB or HACB is required to make retroactive subsidy payments to the owner or family depends upon which party is responsible for the incorrect subsidy payment and whether the action taken was an error or program abuse. Policies regarding reimbursement are discussed in the three sections that follow.

2. FAMILY-CAUSED ERRORS AND PROGRAM ABUSE

Family Reimbursement to HACB [HCV GB pp. 22-12 to 22-13]

In the case of family-caused errors or program abuse, the family will be required to repay any excess subsidy received. HACB may, but is not required to offer the family a repayment agreement. If the family fails to repay the excess subsidy, HACB will terminate the family's assistance in accordance with the policies.

HACB Reimbursement to Family [HCV GB p. 22-12]

HACB will not reimburse the family for any underpayment of assistance when the underpayment clearly is caused by the family.

Prohibited Actions

An applicant or participant in the HCV program must not knowingly:

- Make a false statement to HACB [Title 18 U.S.C. Section 1001].
- Commit fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program [24 CFR 982.552(c)(iv)].

Any of the following will be considered evidence of family program abuse:

- Payment to the owner in excess of amounts authorized by HACB for rent, security deposit, and additional services
- Offering bribes or illegal gratuities to HACB Board of Commissioners, employees, contractors, or other HACB representatives
- Offering payments or other incentives to the owner or a third party as an inducement for the third party to make false or misleading statements to HACB on the family's behalf
- Use of a false name or the use of falsified, forged, or altered documents
- Intentional misreporting of family information or circumstances (e.g. income, family composition)
- Omitted facts that were obviously known by a family member (e.g., not reporting employment income)
- Admission of program abuse by an adult family member

HACB may determine other actions to be program abuse based upon a preponderance of the evidence.

Penalties for Program Abuse

In the case of program abuse caused by a family HACB will, at its discretion, impose any of the following remedies.

- HACB may require the family to repay excess subsidy amounts paid by HACB, as described earlier in this section.
- HACB may require, as a condition of receiving or continuing assistance, that a culpable family member not reside in the unit.
- HACB may deny or terminate the family's assistance following the policies.
- HACB may refer the family for state or federal criminal prosecution.

3. OWNER-CAUSED ERROR OR PROGRAM ABUSE

An incorrect subsidy determination caused by an owner generally would be the result of an incorrect owner statement about the characteristics of the assisted unit (e.g., the number of bedrooms, which utilities are paid by the family). It also includes accepting duplicate housing assistance payments for the same unit in the same month, or after a family no longer resides in the unit.

Owner Reimbursement to HACB

In cases where the owner has received excess subsidy, HACB will require the owner to repay the amount owed in accordance with the policies.

Prohibited Owner Actions

An owner participating in the HCV program must not:

- Make any false statement to HACB [Title 18 U.S.C. Section 1001].
- Commit fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program [24 CFR 982.453(a)(3)] including:

Any of the following will be considered evidence of owner program abuse:

- Charging the family rent above or below the amount specified by HACB
- Charging a security deposit other than that specified in the family's lease
- Charging the family for services that are provided to unassisted tenants at no extra charge
- Knowingly accepting housing assistance payments for any month(s) after the family has vacated the unit
- Knowingly accepting incorrect or excess housing assistance payments
- Offering bribes or illegal gratuities to HACB Board of Commissioners, employees, contractors, or other HACB representatives
- Offering payments or other incentives to an HCV family as an inducement for the family to make false or misleading statements to HACB
- Residing in the unit with an assisted family

Remedies and Penalties

When HACB determines that the owner has committed program abuse, HACB may take any of the following actions:

- Require the owner to repay excess housing assistance payments, as discussed earlier in this section and in accordance with the policies.
- Terminate the HAP contract.
- Bar the owner from future participation in any HACB programs.
- Refer the case to state or federal officials for criminal prosecution.

4. HACB-CAUSED ERRORS OR PROGRAM ABUSE

HACB-caused incorrect subsidy determinations include (1) failing to correctly apply HCV rules regarding family composition, income, assets, and expenses, (2) assigning the incorrect voucher size to a family, and (3) errors in calculation.

Repayment to HACB

Neither a family nor an owner is required to repay an overpayment of subsidy if the error or program abuse is caused by staff.

HACB Reimbursement to Family or Owner

HACB will reimburse a family for any underpayment of subsidy, regardless of whether the underpayment was the result of staff-caused error or staff or owner program abuse. Funds for this reimbursement will come from HACB's administrative fee reserves

Prohibited Activities

Any of the following will be considered evidence of program abuse by HACB staff:

- Failing to comply with any HCV program requirements for personal gain
- Failing to comply with any HCV program requirements as a result of a conflict of interest relationship with any applicant, participant, or owner
- Seeking or accepting anything of material value from applicants, participating families, vendors, owners, contractors, or other persons who provide services or materials to HACB
- Disclosing confidential or proprietary information to outside parties
- Gaining profit as a result of insider knowledge of HACB activities, policies, or practices
- Misappropriating or misusing HCV funds
- Destroying, concealing, removing, or inappropriately using any records related to the HCV program
- Committing any other corrupt or criminal act in connection with any federal housing program

5. CRIMINAL PROSECUTION

When HACB determines that program abuse by an owner, family, or HACB staff member has occurred and the amount of overpaid subsidy meets or exceeds the threshold for prosecution under local or state law, HACB will refer the matter to the appropriate entity for prosecution. When the amount of overpaid assistance meets or exceeds the federal threshold, the case will also be referred to the HUD Office of Inspector General (OIG).

Other criminal violations related to the HCV program will be referred to the appropriate local, state, or federal entity.

6. FRAUD AND PROGRAM ABUSE RECOVERIES

HACB may retain a portion of program fraud losses that HACB recovers from a family or owner through litigation, court order, or a repayment agreement [24 CFR 982.163].

HACB must be the principal party initiating or sustaining the action to recover amounts due from tenants that are due as a result of fraud and abuse. 24 CFR 792.202 permits HACB to retain the greater of:

- 50 percent of the amount it actually collects from a judgment, litigation (including settlement of a lawsuit) or an administrative repayment agreement, or
- Reasonable and necessary costs that HACB incurs related to the collection including costs of investigation, legal fees, and agency collection fees.

The family must be afforded the opportunity for an informal hearing in accordance with requirements in 24 CFR 982.555.

If HUD incurs costs on behalf of HACB related to the collection, these costs must be deducted from the amount retained by HACB.

XVIII. Program Administration

Introduction

This chapter discusses administrative policies and practices that are relevant to the activities covered in this plan. The policies are discussed in seven parts as described below:

- A: Administrative Fee Reserve. This part describes HACB's policies with regard to oversight of expenditures from its administrative fee reserve.
- B: Setting Program Standards and Schedules. This part describes what payment standards are, and how they are updated, as well as how utility allowances are established and revised.
- C: Informal Reviews and Hearings. This part outlines the requirements and procedures for informal reviews and hearings, and for informal hearings regarding citizenship status.
- D: Owner or Family Debts to HACB. This part describes policies for recovery of monies that HACB has overpaid on behalf of families, or to owners, and describes the circumstances under which HACB will offer repayment agreements to owners and families. Also discussed are the consequences for failure to make payments in accordance with a repayment agreement.
- E: Section 8 Management Assessment Program (SEMAP). This part describes what the SEMAP scores represent, how they are established, and how those scores affect a HACB.
- F: Record-Keeping. All aspects of the program involve certain types of record-keeping. This part outlines the privacy rights of applicants and participants and record retention policies HACB will follow.
- G: Reporting and Record Keeping for Children with Environmental Intervention Blood Lead Level. This part describes HACB's responsibilities for reporting, data collection, and record keeping relative to children with environmental intervention blood lead levels that are less than six years of age, and are receiving HCV assistance.
- H: Determination of Insufficient Funding. This part describes HACB's policies for determining if there is sufficient funding to issue vouchers, to approve moves to higher cost units or areas, and to continue assistance for all participant families.

A. Administrative Fee Reserve [24 CFR 982.155]

HACB will maintain an administrative fee reserve for the program to pay program administrative expenses in excess of administrative fees paid by HUD for a HACB fiscal year. If funds in the administrative fee reserve are not needed to cover HACB administrative expenses, HACB may use these funds for other housing purposes permitted by Federal, State and local law.

If HACB has not adequately administered any Section 8 program, HUD may prohibit use of funds in the administrative fee reserve, and may direct HACB to use funds in the reserve to improve administration of the program or to reimburse ineligible expenses. HUD also may prohibit use of the funds for certain purposes.

HUD requires HACB Board of Commissioners or other authorized officials to establish the maximum amount that may be charged against the administrative fee reserve without specific approval.

Expenditures from the administrative fee reserve will be made in accordance with all applicable Federal requirements. Expenditures will not exceed \$5,000 per occurrence nor more than \$50,000 in the aggregate for each fiscal year without the prior approval of HACB's Board of Commissioners.

B. Setting Program Standards and Schedules

1. Overview

Although many of the program's requirements are established centrally by HUD, the HCV program's regulations recognize that some flexibility is required to allow HACB to adapt the program to local conditions. This part discusses how HACB establishes and updates certain schedules and standards that are used to administer the program locally. Details about how these schedules are applied to individual families are provided in other chapters. The schedules and standards discussed here include:

- *Payment Standards*, which dictate the maximum subsidy a family can receive; and
- *Utility Allowances*, which specify how a family's payment should be adjusted to account for tenant-paid utilities.

Copies of the payment standard and utility allowance schedules are available for review in HACB's offices during normal business hours.

HACB will maintain documentation to support its annual review of payment standards and utility allowance schedules.

2. Payment Standards [24 CFR 982.503];

The payment standard sets the maximum subsidy payment a family can receive from HACB each month [24 CFR 982.505(a)]. Payment standards are based on fair market rents (FMRs) published annually by HUD. FMRs are set at a percentile within the rent distribution of standard quality rental housing units in each FMR area. For most jurisdictions FMRs are set at the 40th percentile of rents in the market area.

HACB will establish a payment standard schedule that establishes payment standard amounts for each FMR area within HACB's jurisdiction, and for each unit size within each of the FMR areas. For each unit size, HACB may establish a single payment standard amount for the whole FMR area, or may set different payment standards for different parts of the FMR area. Unless HUD grants an exception, HACB is required to establish a payment standard within a "basic range" established by HUD – between 90 and 110 percent of the published FMR for each unit size.

Updating Payment Standards

HACB will review the appropriateness of the payment standards on an annual basis when the new FMR is published. HACB may consider the following factors when determining whether an adjustment should be made to the payment standard schedule:

Exception Payment Standards [982.503(c)]

HACB must request HUD approval to establish payment standards that are higher than the basic range. At HUD's sole discretion, HUD may approve a payment standard amount that is higher than the basic range for a designated part of the FMR area. HUD may approve an exception payment standard amount (in accordance with program requirements) for all units, or for all units of a given size, leased by program families in the exception area. Any HACB with jurisdiction in the exception area may use the HUD-approved exception payment standard amount. The total population of all HUD-approved exception areas in an FMR area may not include more than 50 percent of the population of the FMR area.

Unit-by-Unit Exceptions [24 CFR 982.503(c)(2)(ii)]

Unit-by-unit exceptions to HACB's payment standards generally are not permitted. However, an exception may be made as a reasonable accommodation for a family that includes a person with disabilities. This type of exception does not affect HACB's payment standard schedule.

When needed as a reasonable accommodation, HACB may make an exception to the payment standard without HUD approval if the exception amount does not exceed 110 percent of the applicable FMR for the unit size [HCV GB 7-9]. HACB may request HUD approval for an exception to the payment standard for a particular family if the required amount falls between 110 and 120 percent of the FMR.

A family that requires a reasonable accommodation may request a higher payment standard at the time the Request for Tenancy Approval (RFTA) is submitted. The family must document the need for the exception. In order to approve an exception, or request an exception from HUD, HACB must determine that:

- There is a shortage of affordable units that would be appropriate for the family;
- The family's TTP would otherwise exceed 40 percent of adjusted monthly income; and
- The rent for the unit is reasonable.

"Success Rate" Payment Standard Amounts [24 CFR 982.503(e)]

If a substantial percentage of families have difficulty finding a suitable unit, HACB may request a "success rate payment standard" that applies to the entire jurisdiction. If approved by HUD, a success rate payment standard allows HACB to set its payment standards at 90-110 percent of a higher FMR. To support the request, HACB must demonstrate that during the most recent 6-month period for which information is available:

- Fewer than 75 percent of families who were issued vouchers became participants;
- HACB had established payment standards for all unit sizes, and for the entire jurisdiction, at 100 percent of the published FMR; and
- HACB had a policy of allowing voucher holders who made sustained efforts to locate units at least 60 days to search for a unit.

Although HUD approves the success rate payment standard for all unit sizes in the FMR area, HACB may choose to adjust the payment standard for only some unit sizes in all, or a designated part, of HACB's jurisdiction within the FMR area.

Decreases in the Payment Standard below the Basic Range [24 CFR 982.503(d)]

HACB will request HUD approval to establish a payment standard amount that is lower than the basic range. At HUD's sole discretion, HUD may approve establishment of a payment standard lower than the basic range. HUD will not approve a lower payment standard if the family share for more than 40 percent of program participants exceeds 30 percent of adjusted monthly income.

3. UTILITY ALLOWANCES [24 CFR 982.517]

A HACB-established utility allowance schedule is used in determining family share and HACB subsidy.

HACB will maintain a utility allowance schedule for (1) all tenant-paid utilities, (2) the cost of tenant-supplied refrigerators and ranges, and (3) other tenant-paid housing services such as trash collection.

The utility allowance schedule must be determined based on the typical cost of utilities and services paid by energy-conservative households that occupy housing of similar size and type in the same locality. In developing the schedule, HACB will use normal patterns of consumption for the community as a whole, and current utility rates.

The utility allowance will include the utilities and services that are necessary in the locality to provide housing that complies with housing quality standards. Costs for telephone, cable/satellite television, and Internet services are not included in the utility allowance schedule.

In the utility allowance schedule, HACB will classify utilities and other housing services according to the following general categories: space heating; air conditioning; cooking;

water heating; water; sewer; trash collection; other electric; cost of tenant-supplied refrigerator; cost of tenant-supplied range; and other specified housing services.

The cost of each utility and housing service must be stated separately by unit size and type. The *HCV Guidebook* provides detailed guidance to HACB about establishing utility allowance schedules.

Air Conditioning

Check the regulations

HACB has included an allowance for air-conditioning in its schedule. Central air-conditioning or a portable air conditioner must be present in a unit before HACB will apply this allowance to a family's rent and subsidy calculations.

Reasonable Accommodation

HCV program regulations require HACB to approve a utility allowance amount higher than shown on HACB's schedule if a higher allowance is needed as a reasonable accommodation for a family member with a disability. For example, if a family member with a disability requires such an accommodation, HACB will approve an allowance for air-conditioning, even if HACB has determined that an allowance for air-conditioning generally is not needed.

Utility Allowance Revisions

HACB will review its schedule of utility allowances each year, and will revise the schedule if there has been a change of 10 percent or more in any utility rate since the last time the allowance for that utility was revised.

HACB will maintain information supporting its annual review of utility allowance and any revisions made in its utility allowance schedule.

C. Informal Reviews and Hearings

1. Overview

When HACB makes a decision that has a negative impact on a family, the family is often entitled to appeal the decision. For applicants, the appeal takes the form of an informal review; for participants, or for applicants denied admission because of citizenship issues, the appeal takes the form of an informal hearing.

HACB is required to include in their administrative plans, informal review procedures for applicants, and informal hearing procedures for participants [24 CFR 982.54(d)(12) and (13)].

2. Informal Reviews for Applicants

Informal reviews are provided for program applicants. An applicant is someone who has applied for admission to the program, but is not yet a participant in the program. Informal reviews are intended to provide a “minimum hearing requirement” [24 CFR 982.554], and need not be as elaborate as the informal hearing requirements. (Federal Register Volume 60, No. 127, p 36490).

Decisions Subject to Informal Review [24 CFR 982.554(a)] [24 CFR 982.552(a)(2)]: HACB will give an applicant the opportunity for an informal review of a decision denying assistance. Denial of assistance may include any or all of the following

HACB will only offer an informal review to applicants for whom assistance is being denied. Denial of assistance includes:

- Denying listing on HACB waiting list
- Denying or withdrawing a voucher
- Refusing to enter into a HAP contract or approve a lease
- Refusing to process or provide assistance under portability procedures

Informal reviews are **not** required for the following reasons [24 CFR 982.554(c)]:

- Discretionary administrative determinations by HACB
- General policy issues or class grievances
- A determination of the family unit size under HACB subsidy standards
- HACB determination not to grant approval of the tenancy
- HACB determination that the unit is not in compliance with the HQS
- HACB determination that the unit is not in accordance with the HQS due to family size or composition

Notice to the Applicant [24 CFR 982.554(a)]

HACB will give an applicant prompt notice of a decision denying assistance. The notice will contain a brief statement of the reasons for HACB decision, and must also state that the applicant may request an informal review of the decision. The notice must describe how to obtain the informal review.

Scheduling an Informal Review

A request for an informal review must be made in writing and delivered to HACB either in person or by first class mail, by the close of the business day, no later than 10 business days from the date of HACB’s denial of assistance.

HACB must schedule and send written notice of the informal review within 10 business days of the family’s request.

Informal Review Procedures [24 CFR 982.554(b)]

The informal review will be conducted by a person other than the one who made or approved the decision under review, or a subordinate of this person.

The applicant will be provided an opportunity to present written or oral objections to the decision of HACB.

The person conducting the review will make a recommendation to HACB, but HACB is responsible for making the final decision as to whether assistance should be granted or denied.

Informal Review Decision [24 CFR 982.554(b)]

In rendering a decision, HACB will evaluate the following matters:

Whether or not the grounds for denial were stated factually in the Notice

The Validity of Grounds for Denial of Assistance. If the grounds for denial are not specified in the regulations, then the decision to deny assistance will be overturned.

The Validity of the Evidence. HACB will evaluate whether the facts presented prove the grounds for denial of assistance. If the facts prove that there are grounds for denial, and the denial is required by HUD, HACB will uphold the decision to deny assistance.

If the facts prove the grounds for denial, and the denial is discretionary, HACB will consider the recommendation of the person conducting the informal review in making the final decision whether to deny assistance.

HACB will notify the applicant of the final decision, including a statement explaining the reason(s) for the decision. The notice will be mailed within 10 business days of the informal review, to the applicant and his or her representative, if any, along with proof of mailing.

If the decision to deny is overturned as a result of the informal review, processing for admission will resume.

If the family fails to appear for their informal review, the denial of admission will stand and the family will be so notified.

3. INFORMAL HEARINGS FOR PARTICIPANTS [24 CFR 982.555]

HACB will offer an informal hearing for certain HACB determinations relating to the individual circumstances of a participant family. A participant is defined as a family that has been admitted to HACB's HCV program and is currently assisted in the program. The purpose of the informal hearing is to consider whether HACB's decisions related to the family's circumstances are in accordance with the law, HUD regulations and HACB policies.

HACB is not permitted to terminate a family's assistance until the time allowed for the family to request an informal hearing has elapsed, and any requested hearing has been completed. Termination of assistance for a participant may include any or all of the following:

- Refusing to enter into a HAP contract or approve a lease
- Terminating housing assistance payments under an outstanding HAP contract
- Refusing to process or provide assistance under portability procedures

Decisions Subject to Informal Hearing

Circumstances for which HACB will give a participant family an opportunity for an informal hearing are as follows:

- A determination of the family's annual or adjusted income, and the use of such income to compute the housing assistance payment
- A determination of the appropriate utility allowance (if any) for tenant-paid utilities from HACB utility allowance schedule
- A determination of the family unit size under HACB's subsidy standards
- A determination to terminate assistance for a participant family because of the family's actions or failure to act
- A determination to terminate assistance because the participant has been absent from the assisted unit for longer than the maximum period permitted under HACB policy and HUD rules
- A determination to terminate a family's Family Self Sufficiency contract, withhold supportive services, or propose forfeiture of the family's escrow account [24 CFR 984.303(i)]

Circumstances for which an informal hearing is **not** required are as follows:

- Discretionary administrative determinations by HACB
- General policy issues or class grievances
- Establishment of HACB schedule of utility allowances for families in the program
- HACB determination not to approve an extension or suspension of a voucher term
- HACB determination not to approve a unit or tenancy
- HACB determination that a unit selected by the applicant is not in compliance with the HQS
- HACB determination that the unit is not in accordance with HQS because of family size
- A determination by HACB to exercise or not to exercise any right or remedy against an owner under a HAP contract

HACB will only offer participants the opportunity for an informal hearing when required to by the regulations.

Informal Hearing Procedures

Notice to the Family [24 CFR 982.555(c)]

When HACB makes a decision that is subject to informal hearing procedures, HACB will inform the family of its right to an informal hearing at the same time that it informs the family of the decision.

The notice to the family will include all of the following:

- The proposed action or decision of HACB.
- The date the proposed action will take place.
- A deadline for the family to request the informal hearing.
- The date and time of the hearing
- The location where the hearing will be held
- To whom the hearing request should be addressed
- The family's right to bring evidence, witnesses, legal or other representation at the family's expense
- The right to view any documents or evidence in the possession of HACB upon which HACB based the proposed action and, at the family's expense, to obtain a copy of such documents prior to the hearing
- A copy of HACB's hearing procedures.

The notice will also include:

- For decisions related to the family's annual or adjusted income, the determination of the appropriate utility allowance, and the determination of the family unit size, HACB will notify the family that they may ask for an explanation of the basis of the determination, and that if they do not agree with the decision, they may request an informal hearing on the decision.
- For decisions related to the termination of the family's assistance, or the denial of a family's request for an exception to HACB's subsidy standards, the notice will contain a brief statement of the reasons for the decision, a statement that if the family does not agree with the decision, the family may request an informal hearing on the decision, and a statement of the deadline for the family to request an informal hearing.

Scheduling an Informal Hearing [24 CFR 982.555(d)]

A request for an informal hearing must be made in writing and delivered to HACB either in person or by first class mail, by the close of the business day, no later than 10 business days from the date of HACB's decision or notice to terminate assistance.

HACB will schedule and send written notice of the informal hearing to the family within 10 businesses of the family's request.

The family may request to reschedule a hearing for good cause, or if it is needed as a reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict that seriously affects the health, safety or welfare of the family. Requests to reschedule a hearing must be made orally or in writing prior to the hearing date. At its discretion, HACB may request documentation of the "good cause" prior to rescheduling the hearing.

If the family does not appear at the scheduled time, and was unable to reschedule the hearing in advance due to the nature of the conflict, the family must contact HACB within 24 hours of the scheduled hearing date, excluding weekends and holidays. HACB will reschedule the hearing only if the family can show good cause for the failure to appear, or if it is needed as a reasonable accommodation for a person with disabilities.

Pre-Hearing Right to Discovery [24 CFR 982.555(e)]

Participants and HACB are permitted pre-hearing discovery rights. For the purpose of informal hearings, *documents* include records and regulations.

Family Opportunity to Examine Relevant Documents

- The family will be allowed to copy any documents related to the hearing at a cost of \$.10 per page.
- The family must request discovery of HACB documents no later than 2 business days prior to the scheduled hearing date
- If HACB does not make the document available for examination on request of the family, HACB may not rely on the document at the hearing.

HACB Opportunity to Examine Relevant Documents

- HACB must be given an opportunity to examine the documents at HACB's office.
- HACB will require a copy of all documents that the participant intends to present or utilize at the hearing.
- The participant must make the documents available to HACB no later than 2 business days prior to the scheduled hearing date
- If the family does not make the document available for examination on request of HACB, the family may not rely on the document at the hearing.

Participant's Right to Bring Counsel [24 CFR 982.555(e)(3)]

At its own expense, the family may be represented by a lawyer or other representative at the informal hearing.

Informal Hearing Officer [24 CFR 982.555(e)(4)]

Informal hearings will be conducted by a person or persons approved by HACB, other than the person who made or approved the decision or a subordinate of the person who made or approved the decision.

Attendance at the Informal Hearing

Hearings may be attended by a hearing officer and the following applicable persons:

- A HACB representative(s) and any witnesses for HACB
- The participant and any witnesses for the participant
- The participant's counsel or other representative
- Any other person approved by HACB as a reasonable accommodation for a person with a disability

Conduct at Hearings [24 CFR 982.555(4)(ii)].

The hearing officer is responsible to manage the order of business and to ensure that hearings are conducted in a professional and businesslike manner. Attendees are expected to comply with all hearing procedures established by the hearing officer and guidelines for conduct. Any person demonstrating disruptive, abusive or otherwise inappropriate behavior will be excused from the hearing at the discretion of the hearing officer.

Evidence [24 CFR 982.555(e) (5)]

HACB and the family must be given the opportunity to present evidence and question any witnesses. In general, all evidence is admissible at an informal hearing. Evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings.

Any evidence to be considered by the hearing officer must be presented at the time of the hearing. There are four categories of evidence.

Oral evidence: the testimony of witnesses

Documentary evidence: a writing that is relevant to the case, for example, a letter written to HACB. Writings include all forms of recorded communication or representation, including letters, words, pictures, sounds, videotapes or symbols or combinations thereof.

Demonstrative evidence: Evidence created specifically for the hearing and presented as an illustrative aid to assist the hearing officer, such as a model, a chart or other diagram.

Real evidence: A tangible item relating directly to the case.

Hearsay Evidence is evidence of a statement that was made other than by a witness while testifying at the hearing and that is offered to prove the truth of the matter. Even though evidence, including hearsay, is generally admissible, hearsay evidence alone cannot be used as the sole basis for the hearing officer's decision.

If either HACB or the family fail to comply with the discovery requirements described above, the hearing officer will refuse to admit such evidence.

Other than the failure of a party to comply with discovery, the hearing officer has the authority to overrule any objections to evidence.

Hearing Officer's Decision [24 CFR 982.555(e)(6)]

The person who conducts the hearing must issue a written decision, stating briefly the reasons for the decision. Factual determinations relating to the individual circumstances of the family must be based on a preponderance of evidence presented at the hearing.

In rendering a decision, the hearing officer will consider the following matters:

PHA Notice to the Family: The hearing officer will determine if the reasons for HACB's decision are factually stated in the Notice.

Discovery: The hearing officer will determine if HACB and the family were given the opportunity to examine any relevant documents in accordance with HACB policy.

PHA Evidence to Support HACB Decision: The evidence consists of the facts presented. Evidence is not conclusion and it is not argument. The hearing officer will evaluate the facts to determine if they support HACB's conclusion.

Validity of Grounds for Termination of Assistance (when applicable): The hearing officer will determine if the termination of assistance is for one of the grounds specified in the HUD regulations and PHA policies. If the grounds for termination are not specified in the regulations or in compliance with HACB policies, then the decision of HACB will be overturned.

The hearing officer will issue a written decision to the family and HACB no later than 10 business days after the hearing. The report may contain the following information:

Hearing information:

Name of the participant;
Date, time and place of the hearing;
Name of the hearing officer;
Name of HACB representative; and
Name of family representative (if any)

Background: A brief, impartial statement of the reason for the hearing.

Summary of the Evidence: The hearing officer will summarize the testimony of each witness and identify any documents that a witness produced in support of his/her testimony and that are admitted into evidence.

Findings of Fact: The hearing officer will include all findings of fact, based on a preponderance of the evidence. *Preponderance of the evidence* is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not. Preponderance of the evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

Conclusions: The hearing officer will render a conclusion derived from the facts that were found to be true by a preponderance of the evidence. The conclusion will result in a determination of whether these facts uphold HACB's decision.

Order: The hearing report will include a statement of whether HACB's decision is upheld or overturned. If it is overturned, the hearing officer will instruct HACB to change the decision in accordance with the hearing officer's determination. In the case of termination of assistance, the hearing officer will instruct HACB to restore the participant's program status.

Procedures for Further Hearing

The hearing officer may ask the family for additional information and/or might adjourn the hearing in order to reconvene at a later date, before reaching a decision. If the family misses an appointment or deadline ordered by the hearing officer, the action of HACB will take effect and another hearing will not be granted.

It shall be within the sole discretion of HACB to grant or deny the request for rehearing. A further hearing may be limited to written submissions by the parties, in the manner specified by the hearing officer.

PHA Notice of Final Decision [24 CFR 982.555(f)]

HACB is not bound by the decision of the hearing officer for matters in which HACB is not required to provide an opportunity for a hearing, decisions that exceed the authority of the hearing officer, decisions that conflict with or contradict HUD regulations, requirements, or are otherwise contrary to Federal, State or local laws.

If HACB determines it is not bound by the hearing officer's decision in accordance with HUD regulations, HACB must promptly notify the family of the determination and the reason for the determination.

4. Hearing and Appeal Provisions for Non-Citizens [24 CFR 5.514]

Denial or termination of assistance based on immigration status is subject to special hearing and notice rules. Applicants who are denied assistance due to immigration status are entitled to an informal hearing, not an informal review.

Assistance to a family may not be delayed, denied, or terminated on the basis of immigration status at any time prior to a decision under the United States Citizenship and Immigration Services (USCIS) appeal process. Assistance to a family may not be terminated or denied while HACB hearing is pending, but assistance to an applicant may be delayed pending the completion of the informal hearing.

A decision against a family member, issued in accordance with the USCIS appeal process or HACB informal hearing process, does not preclude the family from exercising the right, that may otherwise be available, to seek redress directly through judicial procedures.

Notice of Denial or Termination of Assistance [24 CFR 5.514(d)]

As discussed in Chapters III and XI, the notice of denial or termination of assistance for noncitizens must advise the family:

- That financial assistance will be denied or terminated, and provide a brief explanation of the reasons for the proposed denial or termination of assistance.
- The family may be eligible for proration of assistance.
- In the case of a participant, the criteria and procedures for obtaining relief under the provisions for preservation of families [24 CFR 5.514 and 5.518].
- That the family has a right to request an appeal to the USCIS of the results of secondary verification of immigration status and to submit additional documentation or explanation in support of the appeal.
- That the family has a right to request an informal hearing with HACB either upon completion of the USCIS appeal or in lieu of the USCIS appeal.
- For applicants, assistance may not be delayed until the conclusion of the USCIS appeal process, but assistance may be delayed during the period of the informal hearing process.

USCIS Appeal Process [24 CFR 5.514(e)]

When HACB receives notification that the USCIS secondary verification failed to confirm eligible immigration status HACB will notify the family in writing of the results of the USCIS verification within 10 business days of receiving the results.

The family will have 30 days from the date of the notification to request an appeal of the USCIS results.

The family must provide HACB with a copy of the written request for appeal and proof of mailing within 10 business days of sending the request to the USCIS.

The family must forward to the designated USCIS office any additional documentation or written explanation in support of the appeal. This material must include a copy of the USCIS document verification request (used to process the secondary request) or such other form specified by the USCIS, and a letter indicating that the family is requesting an appeal of the USCIS immigration status verification results.

The USCIS will notify the family, with a copy to HACB, of its decision. HACB will send written notice to the family of its right to request an informal hearing within 10 business days of receiving notice of the USCIS decision regarding the family's immigration status.

Informal Hearing Procedures for Applicants [24 CFR 5.514(f)]

After notification of the USCIS decision on appeal, or in lieu of an appeal to the USCIS, the family may request that HACB provide a hearing. The request for a hearing must be made either within 10 business days of receipt of HACB notice of denial, or within 10 business days of receipt of the USCIS appeal decision.

The informal hearing procedures for applicant families are described below.

Informal Hearing Officer

HACB will provide an informal hearing before an impartial individual, other than a person who made or approved the decision under review, and other than a person who is a subordinate of the person who made or approved the decision.

Evidence

The family will be provided the opportunity to examine and copy at the family's expense, at a reasonable time in advance of the hearing, any documents in the possession of HACB pertaining to the family's eligibility status, or in the possession of the USCIS (as permitted by USCIS requirements), including any records and regulations that may be relevant to the hearing.

The family will be allowed to copy any documents related to the hearing at a cost of \$.10 per page. The family must request discovery of HACB documents no later than 2 business days prior to the hearing.

The family will be provided the opportunity to present evidence and arguments in support of eligible status. Evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings.

The family will also be provided the opportunity to refute evidence relied upon by HACB, and to confront and cross-examine all witnesses on whose testimony or information HACB relies.

Representation and Interpretive Services

The family is entitled to be represented by an attorney or other designee, at the family's expense, and to have such person make statements on the family's behalf.

The family is entitled to arrange for an interpreter to attend the hearing, at the expense of the family, or HACB, as may be agreed upon by the two parties.

Recording of the Hearing

The family is entitled to have the hearing recorded by audiotape.

HACB will not provide a transcript of an audio taped hearing.

Hearing Decision

HACB will provide the family with a written final decision, based solely on the facts presented at the hearing, within 10 business days of the date of the informal hearing. The decision will state the basis for the decision.

Informal Hearing Procedures for Residents [24 CFR 5.514(f)]

After notification of the USCIS decision on appeal, or in lieu of an appeal to the USCIS, the family may request that HACB provide a hearing. The request for a hearing must be made either within 10 business days of receipt of HACB notice of termination, or within 10 business days of receipt of the USCIS appeal decision.

For the informal hearing procedures that apply to participant families whose assistance is being terminated based on immigration status.

Retention of Documents [24 CFR 5.514(h)]

HACB must retain for a minimum of 5 years the following documents that may have been submitted to HACB by the family, or provided to HACB as part of the USCIS appeal or HACB informal hearing process:

- The application for assistance
- The form completed by the family for income reexamination
- Photocopies of any original documents, including original USCIS documents
- The signed verification consent form
- The USCIS verification results
- The request for a USCIS appeal
- The final USCIS determination
- The request for an informal hearing
- The final informal hearing decision

D. Owner or Family Debts to HACB

1. Overview [24 CFR 982.54]

This part describes HACB's policies for recovery of monies that have been overpaid on behalf of families, or to owners.

When an action or inaction of an owner or participant results in the overpayment of housing assistance, HACB holds the owner or participant liable to return any overpayments to HACB.

HACB will enter into repayment agreements in accordance with the policies contained in this part as a means to recover overpayments.

When an owner or participant refuses to repay monies owed to HACB, HACB will utilize other available collection alternatives including, but not limited to, the following:

- Collection agencies
- Small claims court
- Civil law suit
- State income tax set-off program
- Credit Bureaus

2. Repayment Policy

Owner Debts to HACB

Any amount due to HACB by an owner must be repaid by the owner as follows:

If the owner is entitled to future HAP payments, HACB will reduce the future HAP payments by the amount owed until the debt is paid in full.

If the owner is not entitled to future HAP payments the owner must repay the HAP within sixty (60) days of HACB's determination of the debt.

If the owner refuses to repay the debt HACB will ban the owner from future participation in the program and pursue other modes of collection.

Family Debts to HACB

Any amount due to HACB by an HCV participant must be repaid by the family. If the family is unable to repay the debt within 30 days, HACB will offer to enter into a repayment agreement in accordance with the policies below.

If the family refuses to repay the debt, enter into a repayment agreement, or breaches a repayment agreement, HACB will terminate the assistance upon notification to the family and pursue other modes of collection.

Repayment Agreement [24 CFR 792.103]

The term *repayment agreement* refers to a formal document signed by a tenant or owner and provided to HACB in which a tenant or owner acknowledges a debt in a specific amount and agrees to repay the amount due at specific time periods.

The maximum length of time HACB will enter into a payment agreement with a family is 18 months.

The minimum monthly payment for a payment agreement other than for program fraud is \$25

Repayment Agreement Guidelines

Down Payment Requirement

This schedule does not apply to families who owe HACB as a result of program abuse. Prior to the execution of a repayment agreement, the family must pay a percentage of the balance owed to HACB as follows:

Payment Schedule for Monies Owed to HACB

Initial Payment Due

(% of Total Amount)	Amount Owed
20%	\$0 - \$500
15%	\$501 - \$1,000
10%	\$1,001 - \$2,500
5%	\$2,500 - \$5,000

Payment Thresholds

Amounts between \$2,501 and \$5,000 must be repaid within 18 months.

Amounts between \$1,001 and \$2,500 must be repaid within 14 months.

Amounts between \$501 and \$1,000 must be repaid within 10 months.

Amounts under \$500 must be repaid within 6 months.

Execution of the Agreement

Payment agreements will be executed between HACB and the head of household and spouse/co head (if applicable).

Form of Payment

Payments may only be made by money order or cashier's check.

Reduction in Monthly Payments

Monthly payments may be decreased in cases of family hardship and if requested with reasonable notice from the family, verification of the hardship, and the approval of the Director.

Additional Monies Owed

If the family already has a payment agreement in place and incurs an additional debt to HACB for any reason except program abuse:

HACB will not enter into more than one payment agreement with the family.

Additional amounts owed by the family will be added to the existing payment agreement and the monthly payment will be recalculated.

Due Dates

All payments are due by the close of business on the 10th day of the month. If the 10th does not fall on a business day, the due date is the close of business on the first business day after the 10th.

Non-Payment

If a payment is not received by the end of the business day on the date due, and prior approval for the missed payment has not been given by HACB, the payment will be considered in arrears.

If the payment is in arrears and the family has not contacted or made arrangements with HACB, it will be considered a breach of the agreement and HACB will terminate assistance upon written notification to the family.

The notice will give the family the opportunity to cure by requiring the family to pay the balance in full prior to the termination date.

HACB will also refuse to enter into future repayment agreements with the family.

Moves to another Unit

If the agreement is not in arrears, the family will be permitted to move.

If the agreement is in arrears the family will be required to pay the balance in full or be terminated from the program.

No Offer of Repayment Agreement

HACB will not enter into a repayment agreement:

If there is already a repayment agreement in place with the family

If HACB determines that the family committed program fraud and owes HACB more than \$5000 as a result of HACB's investigation or information from an outside source

If HACB determines that the debt is larger than can be paid back by the family within 18 months.

Debts Due to Misrepresentations/Non-Reporting of Information [24 CFR 982.163]

HUD's definition of program fraud and abuse is a single act or pattern of actions that: Constitutes false statement, omission, or concealment of a substantive fact, made with intent to deceive or mislead, and that results in payment of Section 8 program funds in violation of Section 8 program requirements.

Family error/late reporting

Families who owe money to HACB due to the family's failure to report increases in income in a timely manner will be required to repay in accordance with the guidelines in the Down Payment Requirement and Payment Thresholds sections of this part.

Program Fraud

Families who owe money to HACB due to program fraud, other than what is described in the No Offer of Repayment Agreement section of this part, will be required to pay in accordance with the payment procedures for program fraud below.

If a family owes an amount, which exceeds \$5000.00 as a result of program fraud, the case will be referred to the Inspector General. When appropriate, HACB will refer the case for criminal prosecution.

Payment Procedures for Program Fraud

Families who commit program fraud will be subject to the following procedures:

The maximum time period for a Payment Agreement will be 18 months.

The family will be required to make a minimum down payment of one third (1/3) of the balance or \$250, whichever amount is greater, prior to or upon execution of the Payment Agreement.

The minimum monthly payment will be \$ 50.00.

Debts Due to Minimum Rent Temporary Hardship

If the family owes HACB money for rent arrears incurred during the minimum rent period, HACB will calculate the total amount owed and divide it by 12 to arrive at a reasonable payback amount that the family will be required to pay to HACB monthly in addition to the family's regular monthly rent payment to the owner. The family will be required to pay the increased amount until the arrears are paid in full to HACB.

Minimum rent arrears that are less than \$25.00 will be required to be paid in full the first month following the end of the minimum rent period.

The minimum monthly amount for a payment agreement incurred for minimum rent arrears is \$25.00

HACB will not enter into a payment agreement that will take more than 18 months to pay off.

Writing off Debts

Failure to enter into the repayment agreement will result in your name being entered into the national repository of debts owed to Public Housing Agencies (PHAs). This information is maintained within HUD's Enterprise Verification (EIV) System, which is used by PHAs throughout the United States, therefore you will not be able to apply for any federal assistance program for the next ten years.

E. Management Assessment (SEMAP)

1. OVERVIEW

The Section 8 Management Assessment Program (SEMAP) is a tool that allows HUD to measure PHA performance in key areas to ensure program integrity and accountability. SEMAP scores translate into a rating for each PHA as high performing, standard, or troubled. Scores on individual SEMAP indicators, as well as overall SEMAP ratings, can affect the PHA in several ways.

- High-performing PHAs can be given a competitive advantage under notices of funding availability [24 CFR 985.103].
- PHAs with deficiencies on one or more indicators are required to correct the deficiencies and report to HUD [24 CFR 985.106].
- PHAs with an overall rating of "troubled" are subject to additional HUD oversight, including on-site reviews by HUD staff, a requirement to develop a corrective action plan, and monitoring to ensure the successful implementation of the corrective action plan. In addition, PHAs that are designated "troubled" may not use any part of the administrative fee reserve for other housing purposes [24 CFR 985.107].
- HUD may determine that a PHA's failure to correct identified SEMAP deficiencies or to prepare and implement a corrective action plan required by HUD constitutes a default under the ACC [24 CFR 985.109].

2. SEMAP CERTIFICATION [24 CFR 985.101]

PHAs must submit the HUD-required SEMAP certification form within 60 days after the end of its fiscal year. The certification must be approved by PHA board resolution and signed by PHA Executive Director. If PHA is a unit of local government or a state, a resolution approving the certification is not required, and the certification must be executed by the Section 8 Program Director.

PHAs with less than 250 voucher units are only required to be assessed every other PHA fiscal year. HUD will assess such PHAs annually if the PHA elects to have its performance assessed on an annual basis; or is designated as “troubled” [24 CFR 985.105].

Failure of a PHA to submit its SEMAP certification within the required time frame will result in an overall performance rating of “troubled.”

A PHA’s SEMAP certification is subject to HUD verification by an on-site confirmatory review at any time.

Upon receipt of PHA’s SEMAP certification, HUD will rate PHA’s performance under each SEMAP indicator in accordance with program requirements.

HUD Verification Method

Several of the SEMAP indicators are scored based on a review of a quality control sample selected for this purpose. The PHA or the Independent Auditor must select an unbiased sample that provides an adequate representation of the types of information to be assessed, in accordance with SEMAP requirements [24 CFR 985.2].

If the HUD verification method for the indicator relies on data in the Form-50058 module (formerly known as MTCS) in the PIH Information Center (PIC), and HUD determines that those data are insufficient to verify PHA's certification on the indicator due to PHA's failure to adequately report family data, HUD will assign a zero rating for the indicator [24 CFR 985.3].

3. SEMAP INDICATORS [24 CFR 985.3 and form HUD-52648]

The table below lists each of the SEMAP indicators, contains a description of each indicator, and explains the basis for points awarded under each indicator.

A PHA that expends less than \$300,000 in Federal awards and whose Section 8 programs are not audited by an independent auditor, is not be rated under SEMAP indicators 1-7.

<p>SEMAP Indicators</p> <p>Indicator 1: Selection from the waiting list Maximum Score: 15</p> <ul style="list-style-type: none"> • This indicator shows whether the PHA has written policies in its administrative plan for selecting applicants from the waiting list and whether the PHA follows these policies when selecting applicants for admission from the waiting list. • Points are based on the percent of families that are selected from the waiting list in accordance with the PHA's written policies, according to PHA's quality control sample.
<p>Indicator 2: Rent reasonableness Maximum Score: 20</p> <ul style="list-style-type: none"> • This indicator shows whether the PHA has and implements a reasonable written method to determine and document for each unit leased that the rent to owner is reasonable based on current rents for comparable unassisted units • Points are based on the percent of units for which the PHA follows its written method to determine reasonable rent and has documented its determination that the rent to owner is reasonable, according to the PHA's quality control sample.
<p>Indicator 3: Determination of adjusted income Maximum Score: 20</p> <ul style="list-style-type: none"> • This indicator measures whether the PHA verifies and correctly determines adjusted income for each assisted family, and where applicable, uses the appropriate utility allowances for the unit leased in determining the gross rent. • Points are based on the percent of files that are calculated and verified correctly, according to the PHA's quality control sample.
<p>Indicator 4: Utility allowance schedule Maximum Score: 5</p> <ul style="list-style-type: none"> • This indicator shows whether PHA maintains an up-to-date utility allowance schedule. • Points are based on whether PHA has reviewed the utility allowance schedule and adjusted it when required, according to PHA's certification.
<p>Indicator 5: HQS quality control inspections Maximum Score: 5</p> <ul style="list-style-type: none"> • This indicator shows whether a PHA supervisor reinspects a sample of units under contract during the PHA fiscal year, which meets the minimum sample size requirements for quality control of HQS inspections. • Points are based on whether the required quality control reinspections were completed, according to the PHA's certification.
<p>Indicator 6: HQS enforcement Maximum Score: 10</p> <ul style="list-style-type: none"> • This indicator shows whether, following each HQS inspection of a unit under contract where the unit fails to meet HQS, any cited life-threatening deficiencies are corrected within 24 hours from the inspection and all other deficiencies are corrected within no more than 30 calendar days from the inspection or any PHA-approved extension. • Points are based on whether the PHA corrects all HQS deficiencies in accordance with required time frames, according to PHA's certification.
<p>Indicator 7: Expanding housing opportunities Maximum Points: 5</p>

- Only applies to PHAs with jurisdiction in metropolitan FMR areas.
- This indicator shows whether the PHA has adopted and implemented a written policy to encourage participation by owners of units located outside areas of poverty or minority concentration; informs voucher holders of the full range of areas where they may lease units both inside and outside the PHA's jurisdiction; and supplies a list of landlords or other parties who are willing to lease units or help families find units, including units outside areas of poverty or minority concentration.
- Points are based on whether PHA has adopted and implemented written policies in accordance with SEMAP requirements, according to the PHA's certification.

Housing Choice Vouchers provide an excellent tool for de-concentrating poverty and expanding housing opportunities. The Housing Authority of the City of Bridgeport has established policies and procedures that are designed to promote the de-concentration of families in area of relatively high poverty or minority population. The first step toward accomplishing this objective is to identify the geographic area in which we are attempting to accomplish this objective. That area is defined as the Fairfield County area. The current poverty level for this area in 2005 was 9.7 percent. Therefore, we will seek to promote the de-concentration of families receiving HCV to those census tracts with poverty level below 9.7 percent (i.e., "Non-Impacted Areas"). The determination of the appropriate target area as well as the appropriate threshold poverty level will be reviewed every five years.

Develop Maps and Data Bases

The next step in the process is to develop maps on the target area showing those tracts with poverty rates above and below the threshold set forth above. Maps are available from the U.S. Census Bureau American Fact finder data base that shows the poverty level for each census tract in the target area. Data is also available at the street address level so that staff can determine the poverty status of each voucher hold by street address. Maps will also show transportation, shopping and other amenities.

Identify and Contact Owners of Rental Properties

Once the appropriate maps have been developed HACB will identify all the tracts with poverty levels below the threshold level set forth above. We will identify all rental properties in these areas as well as the owners of such properties. We contact these owners to inform them of the program as well as our program objectives. At least once a year we will hold a symposium for these owners to explain the benefits of the HCV Program.

Identify Organizations to Provide Mobility Counseling

HACB will identify organizations in the areas where we are trying to promote de-concentration for the purpose of developing linkages and providing mobility counseling to landlords and residents. The mobility counseling will include but not be limited to:

- ❖ Working with landlord to remove barriers to de-concentration
- ❖ Assisting voucher holders with identifying housing opportunities in non-impacted areas
- ❖ Assisting vouchers holders with understanding their portability rights
- ❖ Assisting voucher holders with negotiating lease with landlords
- ❖ Mediating conflicts between landlords and tenants

❖ Assisting voucher holders with transportation and other supportive services needs
For those families that are currently residing in impacted areas, HACB will inform them of our objective of expanding housing opportunities and of their portability options. We will also inform these families of the housing options available in non-impacted areas.

Providing Briefing Material to Applicants and Voucher Holders

We will develop a brochure that clearly identifies our goal of expanding housing opportunities. The brochure will:

- ❖ Provide a list of housing opportunities in non-impacted areas
- ❖ Explain portability rights and options
- ❖ Identify organizations that are availability to provide mobility counseling

Evaluating Progress

HACB will evaluate it progress annually in accordance with HUD SEMAP requirements and HACB goals.

Indicator 8: FMR limit and payment standards

Maximum Points: 5 points

- This indicator shows whether HACB has adopted a payment standard schedule that establishes payment standard amounts by unit size for each FMR area in HACB's jurisdiction, that are within the basic range of 90 to 100 percent of the published FMR.
- Points are based on whether HACB has appropriately adopted a payment standard schedule(s), according to HACB's certification.

Indicator 9: Annual reexaminations

Maximum Points: 10

- This indicator shows whether the PHA completes a reexamination for each participating family at least every 12 months.
- Points are based on the percent of reexaminations that are more than 2 months overdue, according to data from PIC.

Indicator 10: Correct tenant rent calculations

Maximum Points: 5

- This indicator shows whether HACB correctly calculates the family's share of the rent to owner.
- Points are based on the percent of correct calculations of family share of the rent, according to data from PIC.

Indicator 11: Pre-contract HQS inspections

Maximum Points: 5

- This indicator shows whether newly leased units pass HQS inspection on or before the effective date of the assisted lease and HAP contract.
- Points are based on the percent of newly leased units that passed HQS inspection prior to the effective date of the lease and HAP contract, according to data from PIC.

Indicator 12: Annual HQS inspections

Maximum Points: 10

- This indicator shows whether PHA inspects each unit under contract at least annually.
- Points are based on the percent of annual HQS inspections of units under contract that are more than 2 months overdue, according to data from PIC.

Indicator 13: Lease-up**Maximum Points: 20 points**

- This indicator shows whether the PHA enters HAP contracts for the number of units or funding reserved under ACC for at least one year.
- Points are based on the percent of units leased during the last completed PHA fiscal year, or the percent of allocated budget authority that has been expended by the PHA, according to data from the PHA's last year-end operating statement that is recorded in HUD's accounting system.

Indicator 14: Family self-sufficiency (FSS)**Maximum Points: 10**

- Only applies to PHAs with mandatory FSS programs.
- This indicator shows whether the PHA has enrolled families in the FSS program as required, and measures the percent of current FSS participants that have had increases in earned income which resulted in escrow account balances.
- Points are based on the percent of mandatory FSS slots that are filled and the percent of families with escrow account balances, according to data from PIC.

Success Rate of Voucher Holders**Maximum Points: 5**

- Only applies to the PHAs that have received approval to establish success rate payment standard amounts, and isn't effective until the second full PHA fiscal year following the date of HUD approval of success rate payment standard amounts.
- This indicator shows whether voucher holders were successful in leasing units with voucher assistance.
- Points are based on the percent of families that were issued vouchers, and that became participants in the voucher program.

Deconcentration Bonus Indicator**Maximum Points: 5**

- Submission of data for this indicator is mandatory for a PHA using one or more payment standard amount(s) that exceed(s) 100 percent of the published FMR set at the 50 percentile rent, starting with the second full PHA fiscal year following initial use of payment standard amounts based on the FMRs set at the 50th percentile.
- Additional points are available to PHAs that have jurisdiction in metropolitan FMR areas and that choose to submit the required data.
- Points are based on whether the data that is submitted meets the requirements for bonus points.

F. Record Keeping

1. OVERVIEW

HACB will maintain complete and accurate accounts and other records for the program in accordance with HUD requirements, in a manner that permits a speedy and effective audit. All such records will be made available to HUD or the Comptroller General of the United States upon request.

In addition, HACB will ensure that all applicant and participant files are maintained in a way that protects an individual's privacy rights.

2. RECORD RETENTION [24 CFR 982.158]

During the term of each assisted lease, and for at least three years thereafter, HACB will keep:

- A copy of the executed lease;
- The HAP contract; and
- The application from the family.

In addition, HACB must keep the following records for at least three years:

- Records that provide income, racial, ethnic, gender, and disability status data on program applicants and participants;
- An application from each ineligible family and notice that the applicant is not eligible;
- HUD-required reports;
- Unit inspection reports;
- Lead-based paint records as required by 24 CFR 35, Subpart B.
- Accounts and other records supporting HACB budget and financial statements for the program;
- Records to document the basis for HACB determination that rent to owner is a reasonable rent (initially and during the term of a HAP contract); and
- Other records specified by HUD.

If an informal hearing to establish a family's citizenship status is held, longer retention requirements apply for some types of documents. For specific requirements, see chapter on Retention of Documents.

3. RECORDS MANAGEMENT

All applicant and participant information will be kept in a secure location and access will be limited to authorized HACB staff.

PHA staff will not discuss personal family information unless there is a business reason to do so. Inappropriate discussion of family information or improper disclosure of family information by staff will result in disciplinary action.

Privacy Act Requirements [24 CFR 5.212 and Form-9886]

The collection, maintenance, use, and dissemination of social security numbers (SSN), employer identification numbers (EIN), any information derived from these numbers, and income information of applicants and participants must be conducted, to the extent applicable, in compliance with the Privacy Act of 1974, and all other provisions of Federal, State, and local law.

Applicants and participants, including all adults in the household, are required to sign a consent form, HUD-9886, Authorization for Release of Information. This form incorporates the Federal Privacy Act Statement and describes how the information collected using the form may be used, and under what conditions HUD or HACB may release the information collected.

Upfront Income Verification (UIV) Records

HACB will adopt and follow specific security procedures to ensure that all UIV data gathered through HUD's Enterprise Income Verification (EIV) System is protected in accordance with Federal laws, regardless of the media on which the data is recorded (e.g. electronic, paper). These requirements are contained in *Enterprise Income Verification (EIV) System PHA Security Procedures*, Version 1.2, issued January 2005.

Criminal Records

HACB may only disclose the criminal conviction records that HACB receives from a law enforcement agency to officers or employees of HACB, or to authorized representatives of HACB who have a job-related need to have access to the information [24 CFR 5.903(e)].

Any criminal record received by HACB from a law enforcement agency is maintained confidentially, not misused or improperly disseminated, and destroyed, once the purpose for which the record was requested has been accomplished, including expiration of the period for filing a challenge to HACB action without institution of a challenge or final disposition of any such litigation [24 CFR 5.903(g)].

Any sex offender registration information received by HACB from a State or local agency is maintained confidentially, not misused or improperly disseminated, and destroyed, once the purpose for which the record was requested has been accomplished, including expiration of the period for filing a challenge to HACB action without institution of a challenge or final disposition of any such litigation. This requirement does not apply to information that is public information, or is obtained by a PHA other than under 24 CFR 5.905.

Medical/Disability Records

HACB is not permitted to inquire about the nature or extent of a person's disability. HACB will not inquire about a person's diagnosis or details of treatment for a disability or medical condition. If HACB receives a verification document that provides such information, HACB will not place this information in the tenant file and the document(s) will be destroyed.

If HACB there is other pertinent information in the verification document that must be placed in the file, HACB will permanently black out the information that relates to the diagnosis or details of treatment for the person's disability or medical condition.

G. Reporting and Record Keeping For Children with Environmental Intervention Blood Lead Level

1. OVERVIEW

HACB has certain responsibilities relative to children with environmental intervention blood lead levels that are receiving HCV assistance. The notification, verification, and hazard reduction requirements are discussed in this plan. This part deals with the reporting requirements, and data collection and record keeping responsibilities that HACB is subject to

2. REPORTING REQUIREMENT [24 CFR 35.1225(e)]

HACB will provide the public health department written notice of the name and address of any child identified as having an environmental intervention blood lead level within 10 business days of being so notified by any other medical health care professional.

3. DATA COLLECTION AND RECORD KEEPING [24 CFR 35.1225(f)]

At least quarterly, HACB will attempt to obtain from the public health department(s) with a similar area of jurisdiction, the names and/or addresses of children less than 6 years old with an identified environmental intervention blood lead level.

If HACB obtains names and addresses of environmental intervention blood lead level children from the public health department(s), HACB will match this information with the names and addresses of families receiving HCV assistance, unless the public health department performs such a procedure. If a match occurs, HACB must carry out the notification, verification, and hazard reduction requirements discussed in this plan, and the reporting requirement discussed above.

At least quarterly, HACB will also report an updated list of the addresses of units receiving assistance under the HCV program to the same public health department(s), unless the public health department(s) states that it does not wish to receive such a report.

H. Determination of Insufficient Funding

1. OVERVIEW

The HCV regulations allow HACB to deny families permission to move and to terminate Housing Assistance Payments (HAP) contracts if funding under the consolidated ACC is insufficient to support continued assistance [24 CFR 982.314(e)(1) and 982.454]. Insufficient funding may also impact HACB's ability to issue vouchers to families on the waiting list. This part discusses the methodology HACB will use to determine whether or not HACB has sufficient funding to issue vouchers, approve moves, and to continue subsidizing all families currently under a HAP contract.

2. METHODOLOGY

HACB will determine whether there is adequate funding to issue vouchers, approve moves to higher cost units and areas, and continue subsidizing all current participants by comparing HACB's annual budget authority to the annual total HAP needs on a monthly basis. The total HAP needs for the calendar year will be projected by establishing the actual HAP costs year to date. To that figure, HACB will add anticipated HAP expenditures for the remainder of the calendar year. Projected HAP expenditures will be calculated by multiplying the projected number of units leased per remaining months by the most current month's average HAP. The projected number of units leased per month will take into account the average monthly turnover of participant families. If the total annual HAP needs equal or exceed the annual budget authority, or if HACB cannot support the cost of the proposed subsidy commitment (voucher issuance or move) based on the funding analysis, HACB will be considered to have insufficient funding.

Capital Fund Program Five-Year Action Plan

form HUD-50075.2 (4/2008)
 U.S Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2014

Part I: Summary						
PHA Name/Number: Bridgeport Housing Authority CT001			Locality: Bridgeport, Fairfield County, CT		Original Plan	Revision No:
A.	Development Number and Name	Work Statement for Year 1 FFY 2012	Work Statement for Year 2 FFY 2013	Work Statement for Year 3 FFY 2014	Work Statement for Year 4 FFY 2015	Work Statement for Year 5 FFY 2016
B.	Physical Improvements Subtotal *	Annual Statement	\$ 1,463,000.00	\$ 1,583,312.00	\$ 1,544,476.00	\$ 1,464,478.00
C.	Management Improvements *		\$ 683,624.00	\$ 683,624.00	\$ 683,624.00	\$ 683,624.00
D.	PHA Wide Non Dwelling Structures and Equipment *		\$ 251,476.00	\$ 86,164.00	\$ 120,000.00	\$ 209,998.00
E.	Administration *		\$ 341,812.00	\$ 341,812.00	\$ 341,812.00	\$ 341,812.00
F.	Other *		\$ 204,997.00	\$ 204,997.00	\$ 209,997.00	\$ 199,997.00
G.	Operations		\$ 341,811.00	\$ 341,811.00	\$ 341,811.00	\$ 341,811.00
H.	Demolition					
I.	Development					
J.	Capital Fund Financing Debt Service		\$ 176,404.00	\$ 176,404.00	\$ 176,404.00	\$ 176,404.00
K.	Total CFP Funds		\$ 3,463,124.00	\$ 3,418,124.00	\$ 3,418,124.00	\$ 3,418,124.00
L.	Total Non-CFP Funds					

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	Central Office/BHA Wide *	Annual Statement	\$ 518,216.00	\$ 518,216.00	\$ 518,216.00	\$ 728,214.00
	002 Marina Village *		\$ 319,024.00	\$ 257,024.00	\$ 291,024.00	\$ 181,024.00
	005 PT Barnum *		\$ 219,824.00	\$ 329,866.00	\$ 414,962.00	\$ 510,737.00
	006 Charles Greene *		\$ 482,454.00	\$ 308,401.00	\$ 303,401.00	\$ 497,973.00
	007 Fireside Apartments *		\$ 387,068.00	\$ 405,068.00	\$ 388,068.00	\$ 360,892.00
	009 Harborview Towers *		\$ 467,068.00	\$ 392,068.00	\$ 493,068.00	\$ 440,892.00
	044 Trumbull Gardens *		\$ 465,068.00	\$ 748,068.00	\$ 610,013.00	\$ 492,166.00
	881 & 882 Scattered Sites *		\$ 604,402.00	\$ 459,413.00	\$ 399,372.00	\$ 206,226.00
			\$ 3,463,124.00	\$ 3,418,124.00	\$ 3,418,124.00	\$ 3,418,124.00

Capital Fund Program Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statement						
Work Statement for Year 1 FFY 2012	Work Statement for Year 2013 FFY 2013			Work Statement for Year 2014 FFY 2014		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	BHA Wide - Management Improvements	~80 units, site common areas and pathways	\$176,404.00	BHA Wide - Proposed CFFP for VCA Compliance subject to HUD approval	~80 units, site common areas and pathways	\$176,404.00
	002 - Marina Village Site Improvements	lump sum	\$50,000.00	002 - Marina Village Roof Replacement	lump sum	\$50,000.00
	002 - Marina Village Roof Replacement	lump sum	\$50,000.00	002 - Marina Village Grounds Improvements (parking, sidewalks, fencing, sewer, drainage)	lump sum	\$50,000.00
	002 - Marina Village Single Unit Boilers, DHW upgrade, CCTV system	10 units	\$20,000.00	002 - Marina Village Single Unit boiler and DHW upgrade	8 units	\$16,000.00
	002 - Marina Village Demolition		\$50,000.00	002 - Marina Village Vacancy Reduction	5 units	\$5,000.00
	005 - PT Barnum Grounds Improvements (parking, sidewalks, fencing, sewer, drainage)	5 units	\$5,000.00	005 - PT Barnum Building exterior, roofs, gutters, downspouts, attic insulation	2 buildings	\$100,000.00
	005 - PT Barnum Warehouse and Bird Street reconfiguration	2 buildings	\$118,423.00	005 - PT Barnum Vacancy Reduction	5 units	\$5,000.00
	006 - Charles Greene Site Improvements, roof parapet and masonry	lump sum	\$300,000.00	005 - PT Barnum Grounds Improvements (parking, sidewalks, fencing, sewer, drainage)	lump sum	\$109,465.00
	006 - Charles Greene CCTV system	1 bldg	\$20,000.00	005 - PT Barnum Unit Interior finishes upgrades	10 units	\$25,000.00
	006 - Charles Greene Vacancy Reduction	5 units	\$5,000.00	006 - Charles Greene Vacancy Reduction	5 units	\$5,000.00
	006 - Charles Greene Mail, Laundry Rooms & Site Office improvements	1 bldg	\$50,000.00	006 - Charles Greene Site Improvements		\$200,000.00
	007 - Fireside Apartments Roofs, Siding/Gutters and Downspouts	3 bldgs	\$100,000.00	006 - Charles Greene Unit Interior finishes upgrades	10 units	\$25,000.00
	007 - Fireside Apartments Bathroom, Kitchen upgrades and common area flooring	26 units	\$50,000.00	007 - Fireside Apartments Vacancy Reduction	5 units	\$4,000.00
	007 - Fireside Apartments Vacancy Reduction	5 units	\$4,000.00	007 - Fireside Apartments building systems, gutters, downspouts, roofs, sewer systems	5 buildings	\$100,000.00
	009 - Harborview Towers building system improvements (masonry, rear canopy, CCTV, sewer systems)	1 bldg	\$100,000.00	007 - Fireside Apartments Grounds Improvements (parking, sidewalks, fencing, sewer, planting, drainage)	lump sum	\$50,000.00
	009 - Harborview Towers Vacancy Reduction Program	5 units	\$4,000.00	009 - Harborview Towers waste disposal system	lump sum	\$50,000.00
	009 - Harborview Towers Interior finishes	30 units	\$50,000.00	009 - Harborview Towers Vacancy Reduction	5 units	\$4,000.00
	044 - Trumbull Gardens CCTV System	2 bldgs	\$50,000.00	044 - Trumbull Gardens Site Master Plan	lump sum	\$300,000.00
	044 - Trumbull Gardens Townhouse HVAC & DHW upgrades	13 units	\$25,000.00	044 - Trumbull Gardens Unit Boilers, HVAC and DHW upgrade	10 units	\$55,000.00
		continued			continued	

