

CONTRA COSTA COUNTY

1025 ESCOBAR STREET
MARTINEZ, CA 94553



AGENDA

Tuesday, December 3, 2024

1:00 PM

HOUSING AUTHORITY

***FEDERAL D. GLOVER, CHAIR
CANDACE ANDERSEN, VICE CHAIR***

JOHN GIOIA

DIANE BURGIS

KEN CARLSON

CYNTHIA JORDAN

JOANN SEGURA

JOSEPH VILLARREAL, EXECUTIVE DIRECTOR, (925) 957-8001

The public may attend the Board meeting in person and remotely via call-in or Zoom. Board meetings are televised live on Comcast Cable 27, ATT/U-Verse Channel 99, and WAVE Channel 32, and can be seen live online at www.contracosta.ca.gov. Meetings of the Board are closed-captioned in real time.

Persons who wish to address the Board during public comment or with respect to an item on the agenda may comment in person or may call in during the meeting by dialing 888-278-0254 followed by the access code 843298#. A caller should indicate they wish to speak on an agenda item by pushing "#2" on their phone. Persons who wish to address the Board in person should complete the form provided for that purpose. Access via Zoom is also available using the following link: <https://cccouny-us.zoom.us/j/87344719204>. Those participating via Zoom should indicate they wish to speak on an agenda item by using the "raise your hand" feature in the Zoom app. To provide contact information, please contact Clerk of the Board at clerkoftheboard@cob.cccounty.us or call 925-655-2000. A Spanish language interpreter is available to assist Spanish-speaking callers. If the Zoom connection malfunctions for any reason, the meeting may be paused while a fix is attempted. If the connection is not reestablished, the Board will continue the meeting in person without remote access.

Public comments generally will be limited to two minutes per speaker. In the interest of facilitating the business of the Board, the total amount of time that a member of the public may use in addressing the Board on all agenda items is 10 minutes. Your patience is appreciated.

A lunch break or closed session may be called at the discretion of the Board Chair. Staff reports related to open session items on the agenda are also accessible online at www.contracosta.ca.gov.

1:00 P.M. Convene and call to order

1. **CONSIDER CONSENT ITEMS (Items listed as C.1 through C.4 on the following agenda)**
– Items are subject to removal from Consent Calendar by request of any Commissioner.
Items removed from the Consent Calendar will be considered with the Discussion Items.

2. **DISCUSSION ITEMS**

- D.1** HEARING to consider adoption of Resolution No. 5266, titled the "Public Housing Agency (PHA) Certifications of Compliance with the PHA Plan and Related Regulations including Required Civil Rights Certifications approving HACCC's Annual Plan for fiscal years 2025-2030, including revisions to the Admissions and Continued Occupancy Plan and the Housing Choice Voucher Administrative Plan." (Joseph Villarreal, Executive Director) [24-4001](#)

Attachments: [Reso 5266 HACCC Annual Plan 5Yr Plan FY25 - Attachments](#)

- D.2** RECEIVE report regarding the implications of Project 2025 on the U.S. Department of Housing and Urban Development-assisted programs, with focus on the impact to families in Contra Costa County. [24-4009](#)

Attachments: [6 Project 2025 HUD Chapter.pdf](#)

- D.3** ACCEPT written acknowledgment by the Executive Director (chief executive officer) that he understands the current and future cost of the negotiated health care benefit changes for retirees from both represented and unrepresented classes, as detailed in a report provided by the Housing Authority's Actuary on September 10, 2024 pursuant to Government Code section 7507. [24-4019](#)

Attachments: [3 HACCC Proposed OPEB Plan Change ADC Projection 2024-08-14.pdf](#)

- D.4** ADOPT Resolution No. 5264 approving the health care benefits portion of the Successor Memorandum of Understanding with Public Employees Union, Local #1/AFSCME, for the period July 1, 2024 through June 30, 2027; and ADOPT Resolution No. 5265 approving health care benefits for the unrepresented employees of the Housing Authority. [24-4020](#)

Attachments: [4 RESO Adopt Health Care Benefits MOU 2024-2027 12.3.24.docx](#)
[4 RESO Adopt Health Care Benefits Unrepresented 2024-2027.docx](#)

- D.5** PUBLIC COMMENT (2 Minutes)

3. **CONSENT ITEMS**

- C.1** ADOPT the proposed 2025 meeting schedule for the Housing Authority of the County of Contra Costa Board of Commissioners, as recommended by the Housing Authority Executive Director. [24-4017](#)

C.2 APPROVE and AUTHORIZE the Housing Authority Executive Director, or designee, to execute a contract with Moniz Architecture in the amount of \$255,644 to provide architectural and engineering services for the Housing Choice Voucher satellite office at 2601 Somersville Road in Antioch. (100% U.S. Dept. of Housing and Urban Development) [24-3999](#)

C.3 RECEIVE the Housing Authority of the County of Contra Costa's investment report for the quarter ending on September 30, 2024. (No fiscal impact) [24-4000](#)

Attachments: [Investment Report for QE 09-30-24.pdf](#)

C.4 DENY claim filed by Stephan Fobbs. [24-4018](#)

4. ADJOURN

AGENDA DEADLINE: Thursday, 12 noon, 12 days before the Tuesday Board meetings.

GENERAL INFORMATION

The Board meets in all its capacities pursuant to Ordinance Code Section 24-2.402.

Any disclosable public records related to an open session item on a regular meeting agenda and distributed by the Clerk of the Board to a majority of the members of the Board of Supervisors less than 96 hours prior to that meeting are available for public inspection at 1025 Escobar Street, First Floor, Martinez, CA 94553, during normal business hours.

All matters listed under CONSENT ITEMS are considered by the Board to be routine and will be enacted by one motion. There will be no separate discussion of these items unless requested by a member of the Board before the Board votes on the motion to adopt. Each member of the public will be allowed two minutes to comment on the entire consent agenda.

Persons who wish to speak on matters set for PUBLIC HEARINGS will be heard when the Chair calls for public testimony. Each speaker during public testimony will be limited to two minutes. After public testimony, the hearing is closed and the matter is subject to discussion and action by the Board. Comments on matters listed on the agenda or otherwise within the purview of the Board of Supervisors can be submitted to the office of the Clerk of the Board via mail: Board of Supervisors, 1025 Escobar Street, First Floor, Martinez, CA 94553 or to clerkoftheboard@cob.cccounty.us.

Time limits for public speakers may be adjusted at the discretion of the Chair.

The County will provide reasonable accommodations for persons with disabilities planning to attend Board meetings who contact the Clerk of the Board at least 24 hours before the meeting, at (925) 655-2000.

Anyone desiring to submit an inspirational thought nomination for inclusion on the Board Agenda may contact the Office of the County Administrator or Office of the Clerk of the Board, 1025 Escobar Street, Martinez, California.

Subscribe to receive to the weekly Board Agenda by calling the Office of the Clerk of the Board, (925) 655-2000 or using the County's on line subscription feature at the County's Internet Web Page, where agendas and supporting information may also be viewed:
www.contracosta.ca.gov

DISCLOSURE OF CAMPAIGN CONTRIBUTIONS

Pursuant to Government Code section 84308, members of the Board of Supervisors are disqualified and not able to participate in any agenda item involving contracts (other than competitively bid, labor, or personal employment contracts), franchises, discretionary land use permits and other entitlements if the Board member received, since January 1, 2023, more than \$250 in campaign contributions from the applicant or contractor, an agent of the applicant or contractor, or any financially interested participant who actively supports or opposes the County's decision on the agenda item. Members of the Board of Supervisors who have received, and applicants, contractors or their agents who have made, campaign

contributions totaling more than \$250 to a Board member since January 1, 2023, are required to disclose that fact for the official record of the subject proceeding. Disclosures must include the amount of the campaign contribution and identify the recipient Board member, and may be made either in writing to the Clerk of the Board of Supervisors before the subject hearing or by verbal disclosure at the time of the hearing.



CONTRA COSTA COUNTY

1025 ESCOBAR STREET
MARTINEZ, CA 94553

Staff Report

File #: 24-4001

Agenda Date: 12/3/2024

Agenda #: D.1

To: Contra Costa County Housing Authority Board of Commissioners

From: Joseph Villarreal, Executive Director

Report Title: PUBLIC HOUSING AGENCY FIVE YEAR PLAN FOR FY2025-2030 AND ANNUAL PHA PLAN FOR FY2025 PUBLIC HEARING

☐ Recommendation of the County Administrator ☐ Recommendation of Board Committee

RECOMMENDATIONS:

OPEN the public hearing for the Housing Authority's annual PHA Plan for fiscal year 2025 and Five Year Plan for FYs 2025 -2030, RECEIVE testimony, and CLOSE the public hearing.

ADOPT Resolution No. 5266 titled the "PHA Certifications of Compliance with the PHA Plan and Related Regulations including Required Civil Rights Certifications approving HACCC's Annual Plan for fiscal year 2025-2030, including revisions to the Admissions and Continued Occupancy Plan and the Housing Choice Voucher Administrative Plan."

BACKGROUND:

Any local, regional or state agency that receives funds to operate a federal public housing or housing choice voucher (Section 8) program must submit a Public Housing Agency (PHA) Plan. The PHA Plan is a template that outlines public housing agency policies, programs, operations, and strategies for meeting local housing needs and goals. There are two parts to the PHA Plan: the Five-Year Plan, which each PHA submits to the U.S. Department of Housing and Urban Development (HUD) once every fifth PHA fiscal year, and the Annual Plan, which is submitted to HUD every year.

The Five-Year Plan describes the agency's mission and the long-term goals for achieving that mission over the subsequent five years. The Annual Plan provides details about the PHA's current programs and the resident population served, as well as the PHA's strategy for addressing the housing needs of currently assisted families and the larger community. The Annual Plan also serves as the PHA's yearly request for grants to support improvements to public housing buildings (through the Capital Fund Program).

As required by HUD, Housing Authority (HACCC) staff provided public notice of this hearing in the East, West and Contra Costa Times on October 14th, 15th and 16th, 2024. Staff met with the agency's Resident Advisory Board (RAB) on October 3, October 10, 17, and 24 and lastly on November 6, 2024 to discuss the proposed Plans. The RAB approved the proposed changes to the Annual Plan and the Five-Year Plan at the November 6, 2024 meeting.

The following sections discuss the major changes proposed by staff to the Five Year and Annual Plans, its elements and to HACCC's policies.

Public Housing

The proposed changes to HACCC's Public Housing Admissions and Continued Occupancy Plan (ACOP) are as follows:

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

Capital Fund

The Capital Fund program provides PHAs with annual funding from HUD for public housing development, financing, and modernization as well as for management improvements and security costs. Capital fund dollars cannot be used for luxury improvements, direct social services, costs funded by other HUD programs, or any other ineligible activities as determined by HUD on a case-by-case basis. PHAs must report annually on how they plan to use their capital funds.

The proposed PHA Plan shows ongoing and planned capital fund activity. The following projects are among the proposed for HACCC’s Federal Fiscal Year (FFY) 2023 & 2024 capital fund grants:

- \$1,125,000 for Electrical Infrastructure Replacement for Alhambra Terrace public housing development.
- \$750,000 for roofing and HVAC at Vista Del Camino public housing development.
- \$270,000 for boiler replacement at Kidd Manor.
- \$226,000 for unscheduled and emergency unit modernization and site improvements at various properties.
- \$139,000 for repair and replacement of concrete walks and driveways at various properties.
- \$137,000 for non-routine maintenance repairs (ordinary maintenance items such as window and flooring replacement or electrical repair where the scale of damage is beyond the scope of day-to-day maintenance) at various properties.
- \$62,000 for new appliances at various properties.

Housing Choice Voucher

In addition to numerous grammatical changes, edits were made to the standard HUD language in the plan that introduces specific subject matter. These are not policy changes but regulatory edits from the Code of Federal Regulations. Due to delays in implementation of HUD's Housing Through Modernization Act of 2016 (HOTMA), the changes implemented in the 2023 Administrative Plan could not go into effect until HUD announces the new HOTMA compliance date. Accordingly, language was added to the latest Administrative Plan that clarifies that until the HOTMA compliance date is announced, HACCC will be complying with the Administrative Plan approved by the Board on December 13, 2022. The following proposed substantial changes were made to the Housing Choice Voucher Program (HCV) Administrative Plan (Administrative Plan) as it pertains to HACCC Policy:

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

A complete copy of the proposed annual PHA Plan, Administrative Plan and ACOP are available for review on the HACCC's website: www.contracostahousing.org <<http://www.contracostahousing.org>>. In addition, copies

of the plans are available for review at HACCC offices.

Attached to this Board Order are the HUD-required documents for submission.

FISCAL IMPACT:

No direct financial impact.

CONSEQUENCE OF NEGATIVE ACTION:

Should the Board of Commissioners elect not to approve the PHA Annual and Five-Year Plans, HACCC will be out of compliance with HUD requirements and may not receive any funding via HUD's Capital Fund program until the PHA Annual and Five-Year Plans have been submitted to, and approved by, HUD. HUD may also impose additional sanctions beyond the withholding of Capital Fund funding.

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

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

A.	PHA Information.																																				
A.1	<p> PHA Name: <u>Housing Authority of the County of Contra Costa</u> PHA Code: <u>CA011</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>4/2025</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>963</u> Number of Housing Choice Vouchers (HCVs) <u>9562</u> Total Combined Units/Vouchers <u>10,525</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1"> <thead> <tr> <th data-bbox="167 1465 441 1539">Participating PHAs</th> <th data-bbox="441 1465 573 1539">PHA Code</th> <th data-bbox="573 1465 872 1539">Program(s) in the Consortia</th> <th data-bbox="872 1465 1144 1539">Program(s) not in the Consortia</th> <th colspan="2" data-bbox="1144 1465 1448 1507">No. of Units in Each Program</th> </tr> <tr> <th></th> <th></th> <th></th> <th></th> <th data-bbox="1144 1507 1289 1539">PH</th> <th data-bbox="1289 1507 1448 1539">HCV</th> </tr> </thead> <tbody> <tr> <td data-bbox="167 1539 441 1640">Lead PHA:</td> <td data-bbox="441 1539 573 1640"></td> <td data-bbox="573 1539 872 1640"></td> <td data-bbox="872 1539 1144 1640"></td> <td data-bbox="1144 1539 1289 1640"></td> <td data-bbox="1289 1539 1448 1640"></td> </tr> <tr> <td data-bbox="167 1640 441 1740"></td> <td data-bbox="441 1640 573 1740"></td> <td data-bbox="573 1640 872 1740"></td> <td data-bbox="872 1640 1144 1740"></td> <td data-bbox="1144 1640 1289 1740"></td> <td data-bbox="1289 1640 1448 1740"></td> </tr> <tr> <td data-bbox="167 1740 441 1841"></td> <td data-bbox="441 1740 573 1841"></td> <td data-bbox="573 1740 872 1841"></td> <td data-bbox="872 1740 1144 1841"></td> <td data-bbox="1144 1740 1289 1841"></td> <td data-bbox="1289 1740 1448 1841"></td> </tr> <tr> <td data-bbox="167 1841 441 1906"></td> <td data-bbox="441 1841 573 1906"></td> <td data-bbox="573 1841 872 1906"></td> <td data-bbox="872 1841 1144 1906"></td> <td data-bbox="1144 1841 1289 1906"></td> <td data-bbox="1289 1841 1448 1906"></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program						PH	HCV	Lead PHA:																							
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B.	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input type="checkbox"/> Operation and Management.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Grievance Procedures.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input type="checkbox"/> Substantial Deviation.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>See Attachment B.1.</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input type="checkbox"/> <input type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input type="checkbox"/> Occupancy by Police Officers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Non-Smoking Policies.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers.</p> <p><input type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>See Attachment B.2.</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p>
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p>See Attachment B.3.</p>

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

D.	Affirmatively Furthering Fair Housing (AFFH).							
D.1	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <table border="1"> <tr> <td>Fair Housing Goal:</td> </tr> <tr> <td><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></td> </tr> <tr> <td> <p>1. Reduce discriminatory barriers to residential mobility.</p> <p>i. Work to ban discrimination in housing on the basis of source of income, including receipt of a Housing Choice Voucher, in the unincorporated areas of the County and in the Cities of Antioch, Concord, Pittsburg, and Walnut Creek. Develop and disseminate a model ordinance for adoption by other municipalities throughout the County.</p> <p>ii. Encourage local block grants or other funding for a security deposit fund to incentivize landlords to rent to voucher holders.</p> </td> </tr> </table> <table border="1"> <tr> <td>Fair Housing Goal:</td> </tr> <tr> <td><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></td> </tr> <tr> <td> <p>2. Increase residential racial and ethnic integration by increasing the supply of affirmatively marketed affordable housing for families in high opportunity areas.</p> <p>i. Target the use of Project-Based Vouchers and RAD Transfers of assistance in designated opportunity areas with low poverty rates, healthy neighborhoods and high performing schools.</p> <p>ii. Explore pooling of Project-Based Vouchers across Contra Costa County</p> </td> </tr> </table> <table border="1"> <tr> <td>Fair Housing Goal:</td> </tr> </table>	Fair Housing Goal:	<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>	<p>1. Reduce discriminatory barriers to residential mobility.</p> <p>i. Work to ban discrimination in housing on the basis of source of income, including receipt of a Housing Choice Voucher, in the unincorporated areas of the County and in the Cities of Antioch, Concord, Pittsburg, and Walnut Creek. Develop and disseminate a model ordinance for adoption by other municipalities throughout the County.</p> <p>ii. Encourage local block grants or other funding for a security deposit fund to incentivize landlords to rent to voucher holders.</p>	Fair Housing Goal:	<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>	<p>2. Increase residential racial and ethnic integration by increasing the supply of affirmatively marketed affordable housing for families in high opportunity areas.</p> <p>i. Target the use of Project-Based Vouchers and RAD Transfers of assistance in designated opportunity areas with low poverty rates, healthy neighborhoods and high performing schools.</p> <p>ii. Explore pooling of Project-Based Vouchers across Contra Costa County</p>	Fair Housing Goal:
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3. Increase and Stabilize access to proficient Schools

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

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

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

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

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

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

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

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.” (24 CFR §903.7)

☐ **Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

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

☐ **Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.** PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b)) Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA’s procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)). A statement of

the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

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

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

☐ **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))

☐ **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))

☐ **Homeownership Programs.** A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

☐ **Community Service and Self Sufficiency Programs.** Describe how the PHA will comply with the requirements of (24 CFR §903.7(l)). Provide a description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))

☐ **Safety and Crime Prevention (VAWA).** Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

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

☐ **Asset Management.** State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

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

☐ **Significant Amendment/Modification.** PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

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

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

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

☐ **HOPE VI or Choice Neighborhoods.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6 . (Notice PIH 2011-47)

☐ **Mixed Finance Modernization or Development.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

☐ **Demolition and/or Disposition.** With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and

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

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

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

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

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

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

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

☐ **Project-Based Vouchers.** Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan (24 CFR §903.7(b)).

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

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

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

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

B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section (24 CFR §903.7(g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

C. Other Document and/or Certification Requirements.

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

C.2 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations, impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

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

D. Affirmatively Furthering Fair Housing (AFFH).

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

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

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 7.52 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

Attachment B.1

Summary of ACOP Changes

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

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

10-III.A. OVERVIEW

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

10-III.B. PET DEPOSITS

Payment of Deposit

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

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

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

HACCC Policy

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

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

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

HACCC Policy

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

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

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

10-III.C. OTHER CHARGES

Pet-Related Damages During Occupancy

HACCC Policy

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

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

Fumigation of the dwelling unit

Repairs to common areas of the project

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

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

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

Pet Waste Removal Charge

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

HACCC Policy

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

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

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

Attachment B.1.

Summary of December, 2024 Administrative Plan Changes

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

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

- Added language to the Administrative Plan that incorporates mandatory waivers approved for all Mainstream Program participants. Specifically, that initial vouchers would be issued for 120 Days and any voucher extensions would be for a minimum of 90 days.

INTRODUCTION

HOTMA CHANGES IN THE ADMINISTRATIVE PLAN

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

HOTMA 102/104

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

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

HOTMA VOUCHER FINAL RULE

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

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

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

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

ABOUT THE ADMINISTRATIVE PLAN

REFERENCES CITED IN THE ADMINISTRATIVE PLAN

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

HUD

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

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

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

State Law

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

Industry Practice

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

NSPIRE AND HQS IN THE ADMINISTRATIVE PLAN

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

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

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

HOTMA SECTIONS 102 AND 104 CHANGES IN THE MODEL POLICY

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

HOTMA VOUCHER FINAL RULE CHANGES IN THE MODEL POLICY

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

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

RESOURCES CITED IN THE ADMINISTRATIVE PLAN

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

HUD HCV Guidebook

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

Abbreviations

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

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

Resources and Where to Find Them

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

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

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

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

CHAPTER 1

OVERVIEW OF THE PROGRAM AND PLAN

INTRODUCTION

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

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

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

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

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

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

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

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

HACCC Policy

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

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

Increases

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

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

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

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

Changes in Family Unit Size

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

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PART II: INTERIM REEXAMINATIONS [24 CFR 982.516]

11-II.A. OVERVIEW

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

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

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

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

Reporting

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

HACCC Policy

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

~~New Family Members Not Requiring PHA Approval~~

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

New Family and Household Members Requiring Subject to PHA Approval

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

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

HACCC Policy

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

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

HACCC Policy

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

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

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

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

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

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

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

Departure of a Family or Household Member

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

HACCC Policy

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

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

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

11-II.C. CHANGES AFFECTING INCOME OR EXPENSES

Overview

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

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

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

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

HACCC Policy

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

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

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

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

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

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

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

Cumulative Increases [Notice PIH 2023-27]

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

Family Reporting

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

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

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

HACCC Policy

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

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

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

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

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

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

Changes Reported Timely [Notice PIH 2023-27]

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

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

Changes Not Reported Timely [Notice PIH 2023-27]

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

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

PART III: RECALCULATING FAMILY SHARE AND SUBSIDY AMOUNT

11-III.A. OVERVIEW

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

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

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

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

Payment Standards [24 CFR 982.505]

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

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

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

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

Updating Payment Standards

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

HACCC Policy

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

HACCC Policy

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

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

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

HACCC Policy

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

Vacancy Payments [24 CFR 983.352(B)]

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

HACCC Policy

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

Vacancy Loss Guidelines:

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

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

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

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

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

17-IX.C. TENANT RENT TO OWNER

[24 CFR 983.353]

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

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

RAD Phase-in of Increase in Tenant Rent Portion.

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

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

HACCC Policy

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

19-IV.D. WAITING LIST ADMINISTRATION

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

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

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

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

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

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

HACCC Policy

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

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

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

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

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

The following special considerations for Mainstream vouchers apply under portability:

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

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

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

19-IV.G. MANDATORY PROGRAM POLICIES

Initial Search Term

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

HACCC Policy

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

Voucher Extension of Search Term

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

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

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

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

HACCC Policy

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

[9-4]

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

APPENDIX I

HOTMA 102/104 Appendix to the Administrative Plan

Purpose of the Appendix

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

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

HOTMA 102/104 Policies Not Yet Implemented

Chapter 00

No HOTMA 102/104 policies apply.

Chapter 1

No HOTMA 102/104 policies apply.

Chapter 2

No HOTMA 102/104 policies apply.

Chapter 3

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

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

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

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

Chapter 4

No HOTMA 102/104 policies apply.

Chapter 5

No HOTMA 102/104 policies apply.

Chapter 6

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

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

Chapter 7

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

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

Chapter 8

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

Chapter 9

No HOTMA 102/104 policies apply.

Chapter 10

No HOTMA 102/104 policies apply.

Chapter 11

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

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

Chapter 12

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

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

Chapter 13

No HOTMA 102/104 policies apply.

Chapter 14

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

Chapter 15

No HOTMA 102/104 policies apply.

Chapter 16

No HOTMA 102/104 policies apply.

Chapter 17

No HOTMA 102/104 policies apply.

Chapter 18

No HOTMA 102/104 policies apply.

Chapter 19

No HOTMA 102/104 policies apply.

Glossary

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

Annual income (revised)

Day laborer

De minimis error

Earned income

Family (revised)

Foster child

Foster adult

Independent contractor

Inflationary index

Net family assets (revised)

Real property

Seasonal worker

Unearned income

B.1 Housing Needs

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B.1 (c) Deconcentration Policy

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

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

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

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

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

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

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

HACCC Policy

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

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

HACCC Policy

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

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

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

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

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

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

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

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

Deconcentration Incentives

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

B.2 New Activities:

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

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

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

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

ATTACHMENT B.3

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

Goal: Expand the Supply of Assisted Housing

2020 - 2025 Future Actions

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

Progress Report:

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

New Construction components of the PBV program.

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

Goal: Improve the Quality of Assisted Housing

2020-2025 Future Actions

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

Progress Report:

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

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

Goal: Provide an Improved Living Environment

2020-2025 Future Actions

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

Progress Report:

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

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

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

2020-2025 Future Actions

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

Progress Report:

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

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

Goal: Ensure Equal Opportunity in Housing

2020-2025 Future Actions

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

Progress Report:

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

ATTACHMENT B.4

Annual Statement / Performance and Evaluation Report Part I: Summary Capital Fund Program (CFP)			U.S. Department of Housing and Urban Development Office of Public and Indian Housing			
			3843480	-101522	OMB Approval No. 2577-0274 (Exp. 07/31/2017)	
HA Name Housing Authority of the County of Contra Costa			Capital Fund Program Grant Number		FFY of Grant Approval 2025	
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement/Revision Number 1 <input type="checkbox"/> Performance and Evaluation Report for Program Year Ending __ <input type="checkbox"/> Final Performance and Evaluation Report						
Line No.	Summary by Development Account		Total Estimated Cost		Total Actual Cost	
			Original	Revised	Obligated	Expended
1	Total Non-CGP Funds					
2	1406	Operations (May not exceed 25% of line 20)	\$986,250	\$0	\$0	\$0
3	1408	Management Improvements Soft Costs	\$394,500	\$0	\$0	\$0
		Management Improvements Hard Costs				
4	1410	Administration	\$394,500	\$0	\$0	\$0
5	1411	Audit	\$2,000	\$0	\$0	\$0
6	1415	Liquidated Damages				
7	1430	Fees and Costs	\$384,348	\$0	\$0	\$0
8	1440	Site Acquisition				
9	1450	Site Improvement	\$384,348	\$0	\$0	\$0
10	1460	Dwelling Structures	\$745,665	\$0	\$0	\$0
11	1465 1	Dwelling Equipment - Nonexpendable	\$115,304	\$0	\$0	\$0
12	1470	Nondwelling Structures	\$499,652	\$0	\$0	\$0
13	1475	Nondwelling Equipment	\$38,435	\$0	\$0	\$0
14	1485	Demolition	\$0	\$0	\$0	\$0
15	1490	Replacement Reserve				
16	1492	Moving to Work Demonstration				
17	1495 1	Relocation Costs	\$0	\$0	\$0	\$0
18	1498	Mod. Used for Development				
19	1502	Contingency (may not exceed 8% of line 20)	\$0	\$0	\$0	\$0
20	Amount of Annual Grant (Sum of lines 2 - 19)		\$3,945,002	\$0	\$0	\$0
21	Amount of line 20 Related to LBP Activities					
22	Amount of line 20 Related to Section 504 Compliance					
23	Amount of line 20 Related to Security					
24	Amount of line 20 Related to Energy Conservation Measures					
			\$0	\$3,945,002.00		
Signature of Executive Director and Date			Signature of Public Housing Director/Office of Native American Programs Administrator and Date			

Annual Statement / Performance and Evaluation Report Part II: Supporting Pages Capital Fund Program (CFP)				U.S. Department of Housing and Urban Development Office of Public and Indian Housing			
Development Number / Name HA - Wide Activities	General Description of Major Work Categories	Development Account Number	Quantity	Total Estimated Cost		Total Actual Cost	
				Original	Revised	Funds Obligated	Funds Expended
PHA Wide	Operations	1406		\$986,250	\$0	\$0	\$0
	Total for Account 1406			\$986,250	\$0	\$0	\$0
PHA Wide	Management Improvements	1408					
	Property Security in disposed units	1408		\$394,500	\$0	\$0	\$0
	Total for Account 1408			\$394,500	\$0	\$0	\$0
PHA Wide	Administration	1410					
	-Technical and Non-Technical-Salaries & Benefit	1410		\$394,500	\$0	\$0	\$0
	Total for Account 1410			\$394,500	\$0	\$0	\$0
PHA Wide	Audit	1411		\$2,000	\$0	\$0	\$0
	Total for Account 1411			\$2,000	\$0	\$0	\$0
PHA Wide	Fees and Costs	1430		\$384,348	\$0	\$0	\$0
	-Project Management, Planning Costs Prorated annual amount posted			\$384,348	\$0	\$0	\$0
	Total for Account 1430			\$384,348	\$0	\$0	\$0
CA-011001	Site Improvements	1450					
	-Landscape Improvements			\$384,348	\$0	\$0	\$0
	Total for Account 1450			\$384,348	\$0	\$0	\$0
CA-011003	Site Improvements	1450			\$0	\$0	\$
	-Landscape Improvements				\$0	\$0	
	Total for Account 1450			\$0	\$0	\$0	\$0
CA-011004	Site Improvements	1450			\$0	\$0	\$0
	-Landscape Improvements				\$0	\$0	\$0
	Total for Account 1450			\$0	\$0	\$0	\$0
CA-011005	Site Improvements	1450			\$0	\$0	\$0
	-Landscape Improvements				\$0	\$0	\$0

Annual Statement / Performance and Evaluation Report Part II: Supporting Pages Capital Fund Program (CFP)				U.S. Department of Housing and Urban Development Office of Public and Indian Housing			
Development Number / Name HA - Wide Activities	General Description of Major Work Categories	Development Account Number	Quantity	Total Estimated Cost		Total Actual Cost	
				Original	Revised	Funds Obligated	Funds Expended
CA-011006	Site Improvements -Landscape Improvements Total for Account 1450	1450		\$0	\$0	\$0	\$0
CA-011008	Site Improvements -Landscape Improvements Total for Account 1450	1450		\$0	\$0	\$0	\$0
CA-011010	Site Improvements -Landscape Improvements Total for Account 1450	1450		\$0	\$0	\$0	\$0
CA-01109b	Site Improvements -Landscape Improvements Total for Account 1450	1450		\$0	\$0	\$0	\$0
CA-011012	Site Improvements -Landscape Improvements Total for Account 1450	1450		\$0	\$0	\$0	\$0
CA-011013	Site Improvements -Landscape Improvements Total for Account 1450	1450		\$0	\$0	\$0	\$0
CA-011015	Site Improvements -Landscape Improvements Total for Account 1450	1450		\$0	\$0	\$0	\$0
CA-01109b	Site Improvements -Landscape Improvements Total for Account 1450	1450		\$0	\$0	\$0	\$0
CA-011018	Site Improvements -Landscape Improvements Total for Account 1450	1450		\$0	\$0	\$0	\$0

Annual Statement / Performance and Evaluation Report Part II: Supporting Pages Capital Fund Program (CFP)				U.S. Department of Housing and Urban Development Office of Public and Indian Housing			
Development Number / Name HA - Wide Activities	General Description of Major Work Categories	Development Account Number	Quantity	Total Estimated Cost		Total Actual Cost	
				Original	Revised	Funds Obligated	Funds Expended
CA-011001	<u>Dwelling Structures</u> -Unit Interior Modernization	1460		\$0	\$0	\$0	\$0
	Total for Account 1450						
CA-011003	<u>Dwelling Structures</u> -Unit Interior Modernization	1460		\$745,665	\$0	\$0	\$0
	Total for Account 1460						
CA-011004	<u>Dwelling Structures</u> -Unit Interior Modernization	1460		\$745,665	\$0	\$0	\$0
	Total for Account 1450						
CA-011004	<u>Dwelling Structures</u> -Unit Interior Modernization	1460		\$0	\$0	\$0	\$0
	Total for Account 1460						
CA-011005	<u>Dwelling Structures</u> -Unit Interior Modernization	1460					\$0
CA-011010	<u>Dwelling Structures</u> -Unit Interior Modernization	1460		\$0	\$0	\$0	\$0
	Total for Account 1460						
CA-011011	<u>Dwelling Structures</u> -Unit Interior Modernization	1460		\$0	\$0	\$0	\$0
	Total for Account 1460						
CA-011012	<u>Dwelling Structures</u> -Unit Interior Modernization	1460		\$0	\$0	\$0	\$0
	Total for Account 1460						
CA-011013	<u>Dwelling Structures</u> -Unit Interior Modernization	1460		\$0	\$0	\$0	\$0
	Total for Account 1460						
CA-011015	<u>Dwelling Structures</u>			\$0	\$0	\$0	\$0

Annual Statement / Performance and Evaluation Report Part II: Supporting Pages Capital Fund Program (CFP)				U.S. Department of Housing and Urban Development Office of Public and Indian Housing			
Development Number / Name NA - Wide Activities	General Description of Major Work Categories	Development Account Number	Quantity	Total Estimated Cost		Total Actual Cost	
				Original	Revised	Funds Obligated	Funds Expended
	-Unit Interior Modernization	1460		\$0	\$0	\$0	\$0
	Total for Account 1460			\$0	\$0	\$0	\$0
CA-011017	Dwelling Structures -Unit Interior Modernization	1460		\$0	\$0	\$0	\$0
	Total for Account 1460			\$0	\$0	\$0	\$0
CA-011018	Dwelling Structures -Unit Interior Modernization	1460		\$0	\$0	\$0	\$0
	Total for Account 1460			\$0	\$0	\$0	\$0
CA-011008	Dwelling Structures -Unit Interior Modernization	1460		\$0	\$0	\$0	\$0
	Total for Account 1460			\$0	\$0	\$0	\$0
CA-01109b	Dwelling Structures -Unit Interior Modernization	1460		\$0	\$0	\$0	\$0
	Total for Account 1460			\$0	\$0	\$0	\$0
PHA Wide	Dwelling Equipment	1465.1		\$115,304	\$0	\$0	\$0
	Accessibility Improvements	1470		\$489,652	\$0	\$0	\$0
	Non Dwelling Equipment	1475		\$36,435	\$0	\$0	\$0
	Demolition	1485		\$0	\$0	\$0	\$0
	Relocation Costs	1495.1		\$0	\$0	\$0	\$0
	Contingency	1502		\$0	\$0	\$0	\$0
	Totals			\$3,945,002	\$0	\$0	\$0
(1) To be completed for Signature of Executive Director and Date				(2) To be completed for the Performance and Evaluation Report. Signature of Public Housing Director/Office of Native American Programs Administrator and Date			

Annual Statement / Performance and Evaluation Report Part III: Implementation Schedule Capital Fund Program (CFP)				U.S. Department of Housing and Urban Development Office of Public and Indian Housing				OMB Approval No. 2577-0274 (Exp. 07/31/2017)	
Development Number / Name HA - Wide Activities	All Funds Obligated (Quarter Ending Date)			All Funds Expended (Quarter Ending Date)			Reasons for Revised Target Dates (2)		
	Original	Revised	Actual	Original	Revised	Actual			
To be completed for the Performance and Evaluation Report or a Revised Annual Statement.				(2) To be completed for the Performance and Evaluation Report.					
Signature of Executive Director and Date				Signature of Public Housing Director/Office of Native American Programs Administrator and Date					

RAB Meeting

October 3, 2024

RAB Meeting Comments

Question:

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

Answer:

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

Question:

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

Answer:

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

Question:

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

Answer:

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

RAB Meeting

October 10, 2024

RAB Meeting Comments

Question:

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

Answer:

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

Question:

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

Answer:

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

Question:

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

Answer:

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

Question:

JoAnn: Proposition 33?

Answer:

Can't talk about this here.

RAB Meeting
October 17, 2024
RAB Meeting Comments

Question:

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

Answer:

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

Question:

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

Answer:

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

Question:

Timothy Stelly: When will the final budget be in?

Answer:

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

Question:

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

Answer:

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

Question:

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

Answer:

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

Question:

Lanita Mims: What about fundraising?

Answer:

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

Question:

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

Answer:

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

RAB Meeting

October 24, 2024

RAB Meeting Comments

Question:

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

Answer:

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

Question:

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

Answer:

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

Question:

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

Answer:

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

RAB Meeting
November 6, 2024
RAB Meeting Comments

Question:

Joann: How we hold someone accountable when HA removes pet waste?

Answer:

I told her that if we see it, we will speak to the resident to pick up the waste, if they do not, and if maintenance has to clean the waste, there will be a tenant charge followed up with a lease violation letter.

Question:

Joann: What if it's the neighbor who does not follow these rules, and the Housing staff doesn't see the violation happening, how do we handle these situations?

Answer:

I explained that it should be reported to the Housing office in writing. If pictures are available to provide as well. We will then follow up with the resident verbally and if necessary, with lease violations letters.

Question:

Tony Ucciferri : And this will change every year?

Answer:

Every year it changes.

Question:

Tony Ucciferri: So, what happens in the middle of the year for example if all of a sudden, we get oilers, and they weren't part of this. Let's just pretend it's no in here and something happens. Say there's flash flood at some property and it causes something that we didn't budget for, are we still able to fix that or since its not here we don't do it?

Answer:

Yes, we would. We do everything everywhere if it's not listed on current documents, we still do it. It's a matter of modifying the budget.

Question:

Speaking of HOTMA is it in effect yet? Or still tweaking it?

Answer:

Parts of it are so, like I said the actual statue is called the Housing Opportunity Through Modernization Act of 2016 so that gives you an idea of when it came out right, and they gave us this

bible of federal register language and we went about trying to figure out what is what and they said that only these things could be done right now right and it was about 10 items so we all made our changes and then the following year they issued a few other things and we did those things and back in 2019. 2020 they did a whole bunch of changes for the project-based voucher program, so we update those and now in this past year 2023 they issued like I said it was this thick, but it was all tiny tiny words two columns really horrible reading. But there was a lot of changes in there and those are the ones they kind of put on hold.

Question:

With Donald Trump running for office with the possibility of him getting elected what's going to happen to our programs?

Answer:

So last time around with the Trump administration there was a mixed congress so even though he tried to do these things that would hurt our programs, he was stopped by the democrats and members of his own party since they all have assisted households in their districts, but it was really difficult to do. There's a possibility that he's going to have a super majority where both the house and the senate are controlled by his party. Its not the end of the world because a lot of these folks represent districts like all of our districts and many of their constituents are participants in this program and for them to just wipe it out becomes a huge political nightmare so they may talk that game to kind of satisfy some people but they're not going to get to do that very easily.

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

U. S Department of Housing and Urban Development

Office of Public and Indian Housing

OMB No. 2577-0226

Expires 3/31/2024

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

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

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

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

CONTRA COSTA COUNTY

Local Jurisdiction Name

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

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

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

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


Name of Authorized Official:

Gabriel Lemus

Title:

Assistant Deputy Director

Signature:



Date: 11/04/2024

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

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing
instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD
may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the XX 5-Year and/or XX Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 4/2025, in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
 11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
 12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
 13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
 16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Housing Authority of the County of Contra Costa
PHA Name

CA011
PHA Number/HA Code

X Annual PHA Plan for Fiscal Year 20 25

X 5-Year PHA Plan for Fiscal Years 2025 - 2030

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

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

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

FIVE-YEAR PLAN AND SUPPORTING DOCUMENTS

5-Year PHA Plan (for All PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. The **Form HUD-50075-5Y** is to be completed once every 5 PHA fiscal years by all PHAs.

A.	PHA Information.																																
A.1	<div> <div> PHA Name: <u>Housing Authority of the County of Contra Costa</u> PHA Code: <u>CA011</u> </div> <div> PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>4/2025</u> The Five-Year Period of the Plan (i.e. 2019-2023): <u>2025-2030</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission </div> </div> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <div> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below.) </div> <table border="1"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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B.	Plan Elements. Required for <u>all</u> PHAs completing this form.
B.1	<p>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.</p> <p>SEE ATTACHMENT B.1</p>
B.2	<p>Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years.</p> <p>SEE ATTACHMENT B.2</p>
B.3	<p>Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.</p> <p>SEE ATTACHMENT B.3</p>
B.4	<p>Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities, objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.</p> <p>SEE ATTACHMENT B 4</p>
C.	Other Document and/or Certification Requirements.
C.1	<p>Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.</p> <p>SEE ATTACHMENT C.1.</p>
	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the 5-Year PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>See Attachment C.2.</p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.3	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>See Attachment C.3.</p>

C.4	<p>Required Submission for HUD FO Review.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, include Challenged Elements.</p>
D.	<p>Affirmatively Furthering Fair Housing (AFFH).</p>

D.1	<p>Affirmatively Furthering Fair Housing. (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)</p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p>								
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Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

3. Increase and Stabilize access to proficient Schools

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

Instructions for Preparation of Form HUD-50075-5Y - 5-Year PHA Plan for All PHAs

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

- A.1** Include the full **PHA Name**, **PHA Code**, **PHA Fiscal Year Beginning** (MM/YYYY), **Five-Year Period** that the Plan covers, i.e. 2019-2023, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

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

B. Plan Elements.

- B.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. (24 CFR § 903.6(a)(1))
- B.2 Goals and Objectives.** Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years. (24 CFR § 903.6(b)(1))
- B.3 Progress Report.** Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5- Year Plan. (24 CFR § 903.6(b)(2))
- B.4 Violence Against Women Act (VAWA) Goals.** Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. (24 CFR § 903.6(a)(3)).

C. Other Document and/or Certification Requirements.

- C.1 Significant Amendment or Modification.** Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32, REV 2.

C.2 Resident Advisory Board (RAB) comments.

- (a) Did the public or RAB have comments?
- (b) If yes, submit comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR § 903.17(b), 24 CFR § 903.19)

C.3 Certification by State or Local Officials.

[Form HUD-50077-SL](#), *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

C.4 Required Submission for HUD FO Review.

Challenged Elements.

- (a) Did the public challenge any elements of the Plan?
- (b) If yes, include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

D. Affirmatively Furthering Fair Housing.

(Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)

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

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

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year PHA Plan. The 5-Year PHA Plan provides the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average 1.64 hours per year per response or 8.2 hours per response every five years, 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.

FIVE YEAR PLAN – FY2025 – FY2030

B.1 – Mission Statement

The mission of the Housing Authority of the County of Contra Costa is to provide high-quality affordable housing solutions and promote self-sufficiency for low-income people of Contra Costa County.

ATTACHMENT B.2.

HOUSING AUTHORITY OF THE COUNTY OF CONTRA COSTA

Goals and Objectives for Five-Year Plan

Goal: Expand the Supply of Assisted Housing

2025 – 2030 Future Actions

- Continue to offer and leverage project-based vouchers to the extent possible to spur affordable housing development, particularly in conjunction with the County's HOME and CDBG loan programs;
- Seek additional VASH funding. To date, HACCC has been awarded 478 VASH Vouchers and continues to work with VA Medical Center to house veterans;
- Seek to project-base VASH vouchers by identifying developers who may be interested in such funding if it becomes available;
- Continue to work with consultants in order to identify funding mechanisms to rehabilitate or redevelop all of its public housing properties. If the analysis indicates redevelopment or conversion to RAD or other project-based solutions are viable options, then pursue such funding as a means to spur development of new affordable housing in addition to rehabilitation/preservation of existing public housing;
- Explore the expansion of affordable housing on existing public housing properties through the RAD/Section 18 disposition conversion process.
- Continue to work with Health, Housing and Homeless Services and other service providers to operationalize a Moving On program for transitional housing graduates as well as identify new housing opportunities to collaborate on;
- Seek any HUD funding for additional voucher units that becomes available;
- Seek other relevant housing funds that become available.
- Open the HCV waiting list once the existing waiting lists are exhausted.

Goal: Improve the Quality of Assisted Housing

2025 – 2030 Future Actions

- Major modernization programs are expected to begin at one or more of the public housing properties once sources of funding are identified and secured. Based on preliminary analysis, modernization is expected to continue well beyond the next five-year plan; A Phase II EPC may be considered as part of the modernization process.
- Conversion of the electrical infrastructure that is Housing Authority owned to PG&E ownership. This includes upgrading the current aerial lines to underground powerlines.
- Anticipate the expenditure of approximately \$11 million of HUD funding for a variety of modernization projects that include:
 - Foundation repairs at affected buildings at Los Nogales;
 - Initiate planning for transition of the Los Arboles Development to PBV;
 - Phase 3 modernization of Alhambra Terrace development;
 - Initiate planning for redevelopment and conversion of El Pueblo to PBV;
 - Initiate planning for redevelopment and conversion of Bayo Vista to PBV;
 - Complete retrofit of balconies at PH properties.
- Will continue to implement new styles of interior finishes in order to improve and modernize the appearance of units;
- Phased site improvements at all public housing properties are in the planning stage pursuant to Physical Needs Assessments.
- Work will include supplemental ADA improvements and landscape modernization.
- Will continue to partner with regional housing authorities and cities to conduct landlord workshops and informational meetings regarding the voucher program;
- HACCC will develop quarterly in-person landlord workshops and implement a monthly e-mail newsletter for landlords partnering in the HCV Program
- HACCC will expand landlord partnerships by implementing monetary incentives and reimbursements to landlords. One time payments may increase recruitment and retention.
- HACCC will continue to improve work order turnaround time through automation, upgraded software and training. Implement an automated work order response and tracking system
- HACCC will improve inspection protocols by implementing new software that will more easily allow integrating the outcome of inspections into the work order system.
- HACCC staff will continue to emphasize good housekeeping and curb appeal with tenants and maintenance staff;

- Fully implementing the National Standards for Physical Inspection of Real Estate (NSPIRE) standards to improve the quality of HCV assisted housing.

Goal: Provide an Improved Living Environment

2025 – 2030 Future Actions

- Seek to re-establish the De-concentration Bonus in SEMAP;
- Utilize increased site presence by managers to encourage formation of more resident councils;
- Utilize increased site presence by managers to hold more frequent meetings with tenants;
- Increase and improve common area lighting in all housing communities;
- Continue funding additional police/Sheriff patrols as long as budget permits;
- Continue to work with law enforcement to improve response time;
- Increase use of surveillance cameras as needed;
- Seek funding to improve security at public housing sites;
- Seek grants or other funding that will facilitate expanded services for HACCC's clients;
- Seek partnerships with local community agencies to increase and strengthen services offered to public housing tenants and voucher clients;
- Continue to improve and enforce public housing screening policies and procedures.
- Open an East County office for residents assisted by the HCV program;
- In collaboration with the San Pablo Police Department, launch a Mental Health Evaluation team that will provide mental health services for our San Pablo Residents.
- Increase HACCC's partnership with Contra Costa Library to host book fairs at all Public Housing developments.
- Implement key fob system at Kidd Manor to improve resident safety.

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

2025 – 2030 Future Actions

- Continue to operate HACCC's self-sufficiency programs despite surpassing HUD's participation/graduation requirements;
- Expand voucher self-sufficiency services (if not escrow accounts) to public housing tenants where feasible;
- Seek other funding that will facilitate expanded services for HACCC's clients;

- Expand the FSS Program Coordinating Committee (PCC) to seek partnerships with local community agencies to increase and strengthen services offered to public housing tenants and voucher clients;
- FSS to seek additional funding from HUD (applied 10.02.2024)
- \$250,000 in forfeited escrow will enable the funding for an MOU with a Kaiser Phlebotomy course at no cost to the FSS Participant. Future MOU's will be dependent on FSS participant interest.
- Provide or attract supportive services designed to improve resident employability;
- Provide or attract supportive services to increase independence for the elderly or families with disabilities;
- Develop a regular newsletter for participants; share information about HACCC programs (FSS/Homeownership Program) and any future supportive services partnerships; answer frequently asked questions; explain common aspects of HCV Program participation.
- FSS orientations will be in-person to facilitate participant involvement.
- Continue existing policies that permit voucher homeownership;
- Continue to enforce the Community Services Requirements policy;
- Continue providing homeownership workshops with lenders
- Provide Section 3 employment and training opportunities for residents where feasible;

Goal: Ensure Equal Opportunity in Housing

2025 – 2030 Future Actions

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

ATTACHMENT B.3

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

Goal: Expand the Supply of Assisted Housing

2020 - 2025 Future Actions

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

Progress Report:

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

New Construction components of the PBV program.

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

Goal: Improve the Quality of Assisted Housing

2020-2025 Future Actions

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

Progress Report:

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

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

Goal: Provide an Improved Living Environment

2020-2025 Future Actions

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

Progress Report:

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

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

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

2020-2025 Future Actions

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

Progress Report:

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

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

Goal: Ensure Equal Opportunity in Housing

2020-2025 Future Actions

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

Progress Report:

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

B.4 Violence Against Women Act (VAWA) Goals

The HACCC has adopted an Emergency Transfer Plan, based on HUD's model Emergency Transfer Plan (form HUD-5381). The Emergency Transfer Plan defines tenants/ participants eligible for an emergency transfer; lists documentation needed to request an emergency transfer; outlines confidentiality protections; and describes how an emergency transfer may occur. The Emergency Transfer Plan allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to make an internal emergency transfer under VAWA when a safe unit is immediately available and describes the policies for assisting a tenant in making an internal emergency transfer when a safe unit is not immediately available, and describes reasonable efforts the PHA will take to assist a tenant who wishes to make an external emergency transfer when a unit that meets the victim's safety standard is not available.

For the Housing Choice Voucher Program, the Emergency Transfer Plan includes a request for Emergency Transfer whereby the families are permitted to break leases or contracts to escape persecution or dangerous living situations in a timely manner.

HACCC continually offers training to staff regarding VAWA and updates forms and policies as updated by HUD.

Attachment C.1

Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

In accordance with 24 CFR §903.7(r)(2) which requires public housing authorities to identify the basic criteria the agency will use to determine a substantial deviation from its 5-Year Plan and significant amendments or modification to the 5-Year Plan and Annual Plan, the following definitions are used:

Substantial Deviation: A substantial change in the goals identified in the Five-Year Plan. For example, making a formal decision not to pursue a listed goal; or substituting an entirely different set of activities to achieve the goal.

Significant Amendment/Modification: Adding or eliminating major strategies to address housing needs and to major policies (e.g., policies governing eligibility, selection or admissions and rent determination) or programs (e.g., demolition or disposition, designation, homeownership programs or conversion activities); or modifying a strategy such that a substantial transfer of resources away from others is necessary in order to carry it out. Under this PHA Annual Plan, the HACCC is clarifying that any change required to comply with state or federal rule, law, or regulation, where the HACCC is not able to adopt discretionary policy, would not be considered a significant amendment. However, the HACCC would continue to work with the Resident Advisory Board and staff for comments.

A “significant amendment or modification” to its 5-Year plan and/or Annual Plan is a change in policy that significantly and materially alters HACCC’s stated mission, goals, objectives and activities as stated in the Plan unless they are adopted to reflect changes in HUD regulations or requirements. If a change is considered a significant amendment to the 5-Year Plan or to the Annual Plan, it must undergo a public process that includes consultation with the Resident Advisory Board; public notice and public comment period; a public hearing, and approval by HACCC’s Board of Commissioners; and submission to and approval by HUD.

Significant amendments are defined as including the following:

1. A change that materially revises the agency’s mission, goals, or objectives;
2. Material changes to rent or admissions policies or organization of the waiting list;
3. Additions of a Capital Fund project or non-emergency work items that are not in the current Annual Statement or 5-year Action Plan in an amount equal to or greater than \$10,000,000, excluding projects arising out of federally-declared major disasters; acts of God beyond the control of the Authority, such as earthquakes, fires, and storm damage; civil unrest; or other unforeseen significant event;
4. Changes in the use of replacement reserve funds under the Capital Fund program in an amount equal to or greater than \$10,000,000;
5. Material changes in regard to demolition, disposition, designation, or conversion activities;
6. Any other event or activity that the Authority’s Board of Commissioners determines to be a significant amendment to the approved 5-Year Plan or Annual Plan.

For Capital Fund Program projects that deviate from the Capital Fund Program Five-Year Action Plan and the Capital Fund Program Annual State/Performance and Evaluation Reports, only projects that meet the following criteria shall require 5-Year and Annual Plan Amendment: the amount of funds being required exceeds \$10 Million and/or the number of units being worked on comprises more than 15% of a developments ACC unit count. Adding or eliminating major strategies to address housing needs and to major policies (e.g., policies governing eligibility, selection or admissions and rent determination) or programs (e.g., demolition or disposition, designation, homeownership programs or conversion activities); or modifying a strategy such that a substantial transfer of resources away from others is necessary in order to carry it out. Under this PHA Five Year Plan, the HACCC is clarifying that any change required to comply with state or federal rule, law, or regulation, where the HACCC is not able to adopt discretionary policy, would not be considered a significant amendment or modification. However, the HACCC would continue to work with the Resident Advisory Board and staff for comments.

As part of the Rental Assistance Demonstration (RAD) Program, the definition of a substantial deviation from the agency's annual plan will exclude the following RAD-specific items, provided that the adjustments to the RAD plans are authorized by HACCC's Board of Directors in the normal course of business:

- (1) Changes to the Capital Fund Budget produced as a result of each approved RAD conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- (2) Changes to the construction and rehabilitation plan for each approved RAD conversion;
- (3) Changes to the financing structure for each approved RAD conversion;
- (4) The date the significant amendment is submitted to the PHA Plan website;
- (5) Decisions to dedicate a portion of the agency's existing capital funds budget and/or public housing reserves as a source of funds for purposes of a RAD conversion and recapitalization transaction.

RAB Meeting

October 3, 2024

RAB Meeting Comments

Question:

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

Answer:

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

Question:

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

Answer:

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

Question:

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

Answer:

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

RAB Meeting

October 10, 2024

RAB Meeting Comments

Question:

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

Answer:

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

Question:

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

Answer:

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

Question:

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

Answer:

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

Question:

JoAnn: Proposition 33?

Answer:

Can't talk about this here.

RAB Meeting

October 17, 2024

RAB Meeting Comments

Question:

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

Answer:

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

Question:

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

Answer:

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

Question:

Timothy Stelly: When will the final budget be in?

Answer:

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

Question:

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

Answer:

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

Question:

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

Answer:

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

Question:

Lanita Mims: What about fundraising?

Answer:

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

Question:

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

Answer:

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

RAB Meeting

October 24, 2024

RAB Meeting Comments

Question:

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

Answer:

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

Question:

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

Answer:

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

Question:

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

Answer:

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

RAB Meeting
November 6, 2024
RAB Meeting Comments

Question:

Joann: How we hold someone accountable when HA removes pet waste?

Answer:

I told her that if we see it, we will speak to the resident to pick up the waste, if they do not, and if maintenance has to clean the waste, there will be a tenant charge followed up with a lease violation letter.

Question:

Joann: What if it's the neighbor who does not follow these rules, and the Housing staff doesn't see the violation happening, how do we handle these situations?

Answer:

I explained that it should be reported to the Housing office in writing. If pictures are available to provide as well. We will then follow up with the resident verbally and if necessary, with lease violations letters.

Question:

Tony Ucciferri : And this will change every year?

Answer:

Every year it changes.

Question:

Tony Ucciferri: So, what happens in the middle of the year for example if all of a sudden, we get oilers, and they weren't part of this. Let's just pretend it's no in here and something happens. Say there's flash flood at some property and it causes something that we didn't budget for, are we still able to fix that or since its not here we don't do it?

Answer:

Yes, we would. We do everything everywhere if it's not listed on current documents, we still do it. It's a matter of modifying the budget.

Question:

Speaking of HOTMA is it in effect yet? Or still tweaking it?

Answer:

Parts of it are so, like I said the actual statue is called the Housing Opportunity Through Modernization Act of 2016 so that gives you an idea of when it came out right, and they gave us this

bible of federal register language and we went about trying to figure out what is what and they said that only these things could be done right now right and it was about 10 items so we all made our changes and then the following year they issued a few other things and we did those things and back in 2019. 2020 they did a whole bunch of changes for the project-based voucher program, so we update those and now in this past year 2023 they issued like I said it was this thick, but it was all tiny tiny words two columns really horrible reading. But there was a lot of changes in there and those are the ones they kind of put on hold.

Question:

With Donald Trump running for office with the possibility of him getting elected what's going to happen to our programs?

Answer:

So last time around with the Trump administration there was a mixed congress so even though he tried to do these things that would hurt our programs, he was stopped by the democrats and members of his own party since they all have assisted households in their districts, but it was really difficult to do. There's a possibility that he's going to have a super majority where both the house and the senate are controlled by his party. Its not the end of the world because a lot of these folks represent districts like all of our districts and many of their constituents are participants in this program and for them to just wipe it out becomes a huge political nightmare so they may talk that game to kind of satisfy some people but they're not going to get to do that very easily.

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

U. S Department of Housing and Urban Development

Office of Public and Indian Housing

OMB No. 2577-0226

Expires 3/31/2024

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

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

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

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

CONTRA COSTA COUNTY

Local Jurisdiction Name

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

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

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

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

Name of Authorized Official:

Gabriel Lemus

Title:

Assistant Deputy Director

Signature:



Date: 11/04/2024

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

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing
instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD
may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.



CONTRA COSTA COUNTY

1025 ESCOBAR STREET
MARTINEZ, CA 94553

Staff Report

File #: 24-4009

Agenda Date: 12/3/2024

Agenda #: D.2

To: Contra Costa County Housing Authority Board of Commissioners

From: Joseph Villarreal, Executive Director

Report Title: PROJECT 2025 IMPLICATIONS ON FUTURE OF HUD ASSISTED PROGRAMS

☐ Recommendation of the County Administrator ☐ Recommendation of Board Committee

RECOMMENDATIONS:

RECEIVE report regarding the implications of Project 2025 on the U.S. Department of Housing and Urban Development (HUD)-assisted programs, with focus on the impact to families in Contra Costa County

BACKGROUND:

Please see attached report.

FISCAL IMPACT:

None. Informational item only.

CONSEQUENCE OF NEGATIVE ACTION:

None. Informational item only.

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Benjamin S. Carson, Sr., MD

The U.S. Department of Housing and Urban Development (HUD) administers a web of federal programs with mandates to support access to homeownership and affordable rental housing, relieve temporary housing instability for homeless persons, preserve a stable inventory of public housing units, and enforce mandates with powers to settle compliance matters ranging from housing quality standards to housing discrimination cases.

Politicians across party lines use HUD to promise ever-greater public benefits. In addition, HUD programs tend to perpetuate the notion of bureaucratically provided housing as a basic life need and, whether intentionally or not, fail to acknowledge that these public benefits too often have led to intergenerational poverty traps, have implicitly penalized family formation in traditional two-parent marriages, and have discouraged work and income growth, thereby limiting upward mobility. A new conservative Administration will therefore need to:

- **Reset HUD.** This effort should specifically include a broad reversal of the Biden Administration’s persistent implementation of corrosive progressive ideologies across the department’s programs.
- **Implement an action plan across both *process* and *people*.** This plan should include both the immediate redelegation of authority to a cadre of political appointees and the urgent implementation of administrative regulatory actions with respect to HUD policy and program eligibility.

- **Reverse HUD’s mission creep over nearly a century of program implementation dating from the Department’s New Deal forebears.** HUD’s new political leadership team will need to reexamine the federal government’s role in housing markets across the nation and consider whether it is time for a “reform, reinvention, and renewal”¹ that transfers Department functions to separate federal agencies, states, and localities.

OVERVIEW

HUD was created by the Housing and Urban Development Act of 1965² and since then has administered several programs that had been administered by the Housing and Home Finance Agency. With a proposed fiscal year (FY) budget authority totaling \$71.9 billion and 8,326 full-time equivalent (FTE) employees,³ it remains the largest government agency charged with implementing federal housing policy.

In addition to its headquarters in Washington, D.C., HUD has 10 regional offices as well as field offices and centers to implement specialized operational and enforcement responsibilities.⁴ HUD program offices also interface with various networks of implementing organizations such as locally chartered public housing agencies (PHAs) and federal, state, and local government and judicial bodies as well as such private industry participants as mortgage lenders.

The Secretary of Housing and Urban Development can delegate authority to various entities across an array of HUD programs.⁵ The Secretary also oversees the Office of the Deputy Secretary;⁶ the Office of Hearings and Appeals (OHA);⁷ the Office of Small and Disadvantaged Business Utilization (OSDBU);⁸ and the Center for Faith-Based and Neighborhood Partnerships (CFBNP).⁹ The Office of the Secretary also comprises a team of politically appointed positions and career support staff. Each of the following offices should be headed by political appointees except where otherwise noted.

- **Office of Administration**, headed by the Chief Administration Officer. The Office of Administration has responsibilities for the Office of the Chief Human Capital Officer (OCHO, headed by the Chief Human Capital Officer, currently a career position) and the Office of the Chief Procurement Officer (CPO, headed by the Chief Procurement Officer, currently a career position).
- **Office of the Chief Financial Officer**, headed by the Chief Financial Officer.
- **Office of the Chief Information Officer**, headed by the Chief Information Officer.

- **Office of Public Affairs**, headed by a Senate-confirmed Assistant Secretary (AS) or Principal Deputy Assistant Secretary (PDAS).
- **Office of Congressional and Intergovernmental Relations (CIR)**, headed by a Senate-confirmed AS or PDAS.
- **Office of Community Planning and Development (CPD)**, headed by a Senate-confirmed AS or Principal DAS. CPD administers various entitlement and non-entitlement programs across community development, disaster recovery, and housing for the homeless¹⁰ and individuals with special needs, including Housing Opportunities for Persons with AIDS (HOPWA). The two largest CPD-administered programs are the Community Development Block Grant (CDBG) Program,¹¹ which includes disaster recovery funding, and the Home Investment Partnerships Program (HOME).¹² CPD's Relocation and Real Estate Division (RRED) has departmental delegated authority for the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.¹³
- **Office of Public and Indian Housing (PIH)**, headed by a Senate-confirmed AS or PDAS. PIH administers public housing and tenant-based rental assistance programs, as well as authorities for Native American and Native Hawaiian housing assistance and loan guarantee programs under the Native American Housing Assistance and Self-Determination Act (NAHSDA).¹⁴ Tenant-Based Rental Assistance represents the major portion of HUD's nonemergency discretionary budget. HUD describes its Housing Choice Voucher Program as "an essential component of the Federal housing safety net for people in need."¹⁵ PIH also implements funding for the Self-Sufficiency Coordinator Program; the Public Housing Fund (operating and capital funds for PHA administration of Section 9 public housing and Section 8 voucher programs); and Choice Neighborhoods (zeroed out during the Trump Administration budget request but included in HUD's FY 2023 budget, which requests \$250 million for the program).¹⁶
- **Office of Housing and Federal Housing Administration (FHA)**, headed by a dual-hatted, Senate-confirmed AS and Federal Housing Commissioner or Acting Federal Housing Commissioner. The Office of Housing oversees implementation of the department's project-based rental assistance (PBRA) multifamily housing portfolio, Section 202 supportive housing for the elderly program, Section 811 program for disabled persons' housing, and Housing Counseling Assistance program. The Federal Housing Administration administers the Mutual Mortgage Insurance

Mandate for Leadership: The Conservative Promise

Program (MMIF) and various other mortgage insurance, direct loan, and loan guarantee programs for single-family housing, multifamily housing, hospitals, and health care facilities that meet certain conditions.¹⁷

- **Government National Mortgage Association (GNMA)**, headed by a Senate-confirmed GNMA President or Executive Vice President. GNMA oversees more than \$2 billion in federal guarantees to mortgage-backed securities structured from mortgages that are pooled from various federal programs, including mortgages backed by programs outside of HUD, principally the single-family mortgage guarantee programs administered by the Department of Veterans Affairs (VA) and the Rural Housing Service at the U.S. Department of Agriculture (USDA). FHA-insured single-family housing mortgages comprise the largest share of GNMA-guaranteed mortgage-backed securities.
- **Office of Departmental Equal Employment Opportunity**, headed by a Director.
- **Office of Fair Housing and Equal Opportunity (FHEO)**, headed by a Senate-confirmed AS or PDAS. The Assistant Secretary for FHEO is the designated HUD official responsible for enforcing Title VI of the Civil Rights Act of 1964,¹⁸ Section 504 of the Rehabilitation Act of 1973,¹⁹ and Section 109 of the Housing and Community Development Act of 1974. After informal efforts to resolve noncompliance, the AS for FHEO may make a formal finding of noncompliance and initiate enforcement action before an administrative tribunal or a referral to the Department of Justice.
- **Office of General Counsel (OGC)**, headed by the General Counsel or Principal Deputy General Counsel. OGC handles department-wide legal and compliance oversight advice with supervision responsibilities for the Deputy General Counsel for Housing Programs, Deputy General Counsel for Operations, and Deputy General Counsel for Enforcement and Fair Housing as well as the Departmental Enforcement Center.²⁰
- **Office of Healthy Homes and Lead Hazard Control (OHHLHC)**, headed by a Director. OHHLHC was established in the early 1990s to eliminate lead-based paint hazards in America's privately owned and low-income housing, address healthy housing initiatives, and enforce lead-based paint regulations authorized under the Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X of the Housing and Community Development Act of 1992).²¹ These functions overlap with similar functions of the Environmental Protection Agency (also authorized to enforce lead-based

paint regulations under Title X) and the Centers for Disease Control and Prevention's Healthy Homes Initiative, Childhood Lead Poisoning Prevention Program, and National Asthma Control Program.

- **Office of Policy Development and Research (PDR)**, headed by a Senate-confirmed AS or PDAS. PDR was established in the early 1970s and today administers research activities, including external contract research grants, and provides analytical and policy advice to senior HUD staff. PDR also provides publicly available statistics through the American Housing Survey (AHS), which is sponsored by HUD and conducted by the Census Bureau; the State of the Cities Data Systems; data on the Low-Income Housing Tax Credit (LIHTC); and annual Fair Market Rents and Income Limits data, among other statistical publications and datasets on the characteristics of families assisted under HUD programs.
- **Office of Inspector General (OIG), headed by an Inspector General.** The OIG is independent of HUD and one of 12 Inspectors General across the federal government authorized under the Inspector General Act of 1978.²² Operating under its own budget authority and strategic plan, the HUD OIG conducts internal and external audits and investigations of HUD programs and operations. While independent of HUD and holding no enforcement powers over HUD programs, HUD OIG works closely with the Office of General Counsel, the Departmental Enforcement Center, and HUD program offices. The Inspector General serves as an adviser to and non-voting member of the FHA Mortgagee Review Board.
- **Office of Field Policy and Management (FPM)**, headed by an Assistant Deputy Secretary for FPM. FPM supports the Secretary through regional and field office communication and external engagement with various community stakeholders to ensure the successful implementation of Secretarial initiatives and special projects.

HUD REFORM PILLARS

Ideally, Congress would redelegate authorities that have been diverted to HUD's administrative bureaucracy and safeguard taxpayers against the mission creep that inevitably occurs when Congress delegates power to an empowered and unelected bureaucracy that is insulated by civil service protections. If implemented, the reforms proposed in this chapter can help a new conservative Administration to use its Article II powers to rectify bureaucratic overreach, reverse the expansion of programs beyond their statutory authority, and end progressive policies that have been put in place at the department.

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It is hoped that a future Congress under conservative leadership will enact legislative reforms of HUD programs. With or without congressional action, however, it is vital that a conservative Administration immediately institute guardrails across HUD programs to remove the administrative state's bureaucratic overreach of Article I authorities, thereby ensuring formal execution of Article II process and personnel reforms of the sort outlined below.

FIRST-DAY AND FIRST-YEAR ADMINISTRATIVE REFORMS²³

A new conservative Administration can and should implement the following reforms that focus on both people²⁴ and process.²⁵ Implementation of these reforms simply requires courageous political leadership across all of HUD's key appointed positions.

- HUD political leadership should immediately assign all delegated powers to politically appointed PDAs, DAs, and other office leadership positions; change any current career leadership positions into political and non-career appointment positions; and use Senior Executive Service (SES) transfers to install motivated and aligned leadership.
- The President should issue an executive order making the HUD Secretary a member of the Committee on Foreign Investment in the U.S., which will gain broader oversight authorities to address foreign threats, particularly from China with oversight of foreign ownership of real estate in both rental and ownership markets of single-family and multifamily housing,²⁶ with trillions worth of real estate secured across HUD's portfolio.
- The Secretary should initiate a HUD task force consisting of politically appointed personnel to identify and reverse all actions taken by the Biden Administration to advance progressive ideology.²⁷
- The Office of the Secretary or the leadership in the Office of General Counsel should conduct a thorough review of all subregulatory guidance that has been instituted outside of the Administrative Procedure Act (APA). Additionally, departmental leadership should:
 1. Immediately end the Biden Administration's Property Appraisal and Valuation Equity (PAVE) policies and reverse any Biden Administration actions that threaten to undermine the integrity of real estate appraisals.²⁸
 2. Repeal climate change initiatives and spending in the department's budget request.²⁹

3. Repeal the Affirmatively Furthering Fair Housing (AFFH) regulation reinstituted under the Biden Administration³⁰ and any other uses of special-purpose credit authorities to further equity.³¹
 4. Eliminate the new Housing Supply Fund.³²
- The Office of the Secretary should recommence proposed regulation put forward under the Trump Administration that would prohibit noncitizens, including all mixed-status families, from living in all federally assisted housing.³³ HUD's statutory obligations include providing housing for American citizens who are in need. HUD reforms must also ensure alignment with reforms implemented by other federal agencies where immigration status impacts public programs, certainly to include any reforms in the Public Charge regulatory framework administered by the U.S. Department of Homeland Security (DHS). Local welfare organizations, not the federal government, should step up to provide welfare for the housing of noncitizens.
 - The Office of the Secretary should execute regulatory and subregulatory guidance actions, across HUD programs and applicable to all relevant stakeholders, that would restrict program eligibility when admission would threaten the protection of the life and health of individuals and fail to encourage upward mobility and economic advancement through household self-sufficiency. Where admissible in regulatory action, HUD should implement reforms reducing the implicit anti-marriage bias in housing assistance programs,³⁴ strengthen work and work-readiness requirements,³⁵ implement maximum term limits for residents in PBRA and TBRA programs,³⁶ and end Housing First³⁷ policies so that the department prioritizes mental health and substance abuse issues before jumping to permanent interventions in homelessness.³⁸ Notwithstanding administrative reforms, Congress should enact legislation that protects life and eliminates provisions in federal housing and welfare benefits policies that discourage work, marriage, and meaningful paths to upward economic mobility.
 - The AS or PDAS for the Office of Policy Development and Research should suspend all external research and evaluation grants in the Office of Policy Development and Research and end or realign to another office any functions that are not involved in the collection and use of data and survey administration functions and do not facilitate the execution of regulatory impact analysis studies.

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- FHA leadership should increase the mortgage insurance premium (MIP) for all products above 20-year terms and maintain MIP for all products below 20-year terms and all refinances. FHA should encourage wealth-building homeownership opportunities, which can be accomplished best through shorter-duration mortgages.³⁹ Ideally, Congress would contemplate a fundamental revision of FHA's statutory restriction of single-family housing mortgage insurance to first-time homebuyers.⁴⁰ This would include (with support from HUD leadership):
 1. Moving the Home Equity Conversion Mortgages (HECM) program once again to its own special risk insurance fund.
 2. Revising loan limit determinations.
 3. Providing statutory flexibility for shorter-term products that amortize principal earlier and faster.
- Statutorily restricting eligibility for first-time homebuyers and abandoning the affirmative obligation authorities erected for the single-family housing programs across federal agencies and government-sponsored enterprises.⁴¹
- The HUD Secretary should move the HUD Real Estate Assessment Center (REAC) from PIH to the Office of Housing, which already implements property standards in its multifamily housing lending programs through the multifamily accelerated processing (MAP) lending guidelines. Giving HUD the authority to streamline the enforcement of compliance with housing standards across the federal government and flexibility for physical inspections through private accreditation should also be considered.
- HUD should maintain its requested budget authority for modernization initiatives that are applicable to the Office of the Chief Information Officer and program offices across the department.

LONGER-TERM POLICY REFORM CONSIDERATIONS⁴²

Congress has charged HUD principally with mandates for construction of the nation's affordable housing stock in addition to setting and enforcing standards for decent housing and fair housing enforcement. Regardless of intent, HUD's efforts have yielded mixed results at best. Even today, more than a half-century after Congress put enforcement of so-called fair housing in the hands of the HUD bureaucracy, implementation of this policy is muddled by the repeated application of affirmative race-based policies. Also, the production mandate for HUD's

housing portfolio has waned for decades with the department effectively working to maintain the public housing portfolio from the late 1990s when the Faircloth Amendment capped HUD's public housing portfolio.⁴³

Longer-term reforms of HUD rental assistance programs should encourage choice and competition for renters, encourage participation by landlords where appropriate,⁴⁴ and encourage all non-elderly, able-bodied adults to move toward self-sufficiency. This can be pursued through regulations and legislative reforms that seek to strengthen work requirements, limit the period during which households are eligible for housing benefits, and add flexibility to rent payment terms to facilitate the movement of households toward self-sufficiency.

Obviously, using government vouchers or other such programs to expand housing choice options is not without its downsides. The turn toward mobility vouchers constitutes an abandonment of America's public housing stock, and efforts to increase competition in the public housing market must not come at the expense of local autonomy and the ability of cities, towns, neighborhoods, and communities to choose for themselves the sort of housing they want to allow. Freedom of association and self-government at the most local level possible must remain primary considerations in any conservative effort to increase competition in the public housing market.

Congress should also consider those areas in which federal policy negatively interacts with private markets, including when federal policy crowds out private-sector development and exacerbates affordability challenges that persist across the nation. It is essential that legislation provides states and localities maximal flexibility to pursue locally designed policies and minimize the likelihood of federal preemption of local land use and zoning decisions.

In the same manner, Congress should prioritize any and all legislative support for the single-family home. Homeownership forms the backbone of the American Dream. The purchase of a home is the largest investment most Americans will make in their lifetimes, and homeownership remains the most accessible way to build generational wealth for millions of Americans. For these reasons, American homeowners and citizens know best what is in the interest of their neighborhoods and communities. Localities rather than the federal government must have the final say in zoning laws and regulations, and a conservative Administration should oppose any efforts to weaken single-family zoning. Along the same lines, Congress can propose tax credits for the renovation or repair of housing stock in rural areas so that more Americans are able to access the American Dream of homeownership.

Additionally, enhanced statutory authorities for local autonomy should extend to the prioritizing of federal rental assistance subsidies that emphasize choice and mobility in housing voucher subsidies over static, site-based subsidies and provide authority for maximal flexibility to direct PHA land sales that involve the existing stock of public housing units. Congress must consider the future of the public

housing model. At best, any new public investments will provide maintenance funds to bring substandard housing units and properties up to livability standards but will still fail to address larger aims of upward mobility and dynamism for local housing markets where land can be sold by PHAs and put to greater economic use, thereby benefiting entire local economies through greater private investment, productivity and employment opportunities, and increased tax revenue.

Any long-term view of HUD's future must include maintaining the strong financial operations and reliable reporting that are needed to run a \$50 billion-per-year agency. Before the Trump Administration, HUD effectively did not have a Chief Financial Officer (CFO) for eight years, and HUD's financial infrastructure inevitably deteriorated. The department's auditors were unable to conclude that HUD's internal operations were producing accurate financial reporting. The auditors had identified multiple material weaknesses and significant deficiencies in the department's internal financial controls. Overall, the deterioration of HUD's financial infrastructure led to a lack of accountability with respect to the use of taxpayer funds as well as to pervasive difficulties with operations and program implementation.

However, by hiring a new CFO from the private sector with a proven track record of visionary leadership, HUD was able to implement an agencywide governance structure that improved its financial processes and internal controls and harnessed the power of innovative new technologies to bring a modernized business mindset to the agency's financial infrastructure. By the end of the Trump Administration, for the first time in nearly a decade, HUD was able to address all of its previously identified material weaknesses, and the auditors were able to issue their first clean audit report on HUD's financial statements and internal controls.

Finally, and more fundamentally, Congress could consider a wholesale overhaul of HUD that contemplates devolving many HUD functions to states and localities with any remaining federal functions consolidated to other federal agencies (for example, by transferring loan guarantee programs to SBA; moving Indian housing programs to the Department of the Interior; moving rental assistance, mortgage insurance programs, and GNMA to a redesignated Housing and Home Finance Agency). Generally, this reform path could consolidate some programs, eliminate others that have failed to produce meaningful long-run results, and narrow the scope of many programs so that they are closer to what they were when they were created.

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ENDNOTES

1. At a 1998 Senate hearing, then-HUD Secretary Andrew Cuomo acknowledged that the department “faced a competence gap” and had “the dubious distinction of being the only federal agency designated as ‘high risk’ by the General Accounting [now Government Accountability] Office (GAO),” even referencing the Section 8 rental subsidy as “on the brink of becoming the next savings and loan scandal,” and explained how the department was stepping up enforcement efforts “focused on closing the competence gap by eliminating waste, fraud, and abuse.” See “Testimony of Secretary Andrew Cuomo before the House Appropriations Subcommittee on VA, HUD, and Independent Agencies,” March 25, 1998, <https://archives.hud.gov/testimony/1998/tst32598.cfm> (accessed March 4, 2023).
2. H.R. 7984, Housing and Urban Development Act of 1965, Public Law No. 89-117, 89th Congress, August 10, 1965, <https://www.congress.gov/89/statute/STATUTE-79/STATUTE-79-Pg451.pdf> (accessed March 4, 2023).
3. U.S. Department of Housing and Urban Development, *2023 Budget in Brief*, pp. 2 and 7, https://www.hud.gov/sites/dfiles/CFO/documents/2023_BudgetInBriefFINAL.pdf (accessed March 4, 2023).
4. For example, the Special Applications Center (SAC) located in Chicago, Illinois, was established in 1998 as a division of the Office of Public and Indian Housing to accept, review, and approve all nonfunded, noncompetitive applications and plans for demolition, disposition, and conversion of land subject to an annual contributions contract (ACC) in public housing.
5. The Secretary has delegated full authority for the Administration and enforcement of the Fair Housing Act to the Assistant Secretary of the Office of Fair Housing and Equal Opportunity but also has delegated limited assignment and decision-making authority to the General Counsel.
6. Effectively the HUD Chief Operating Officer and appointed by the President with Senate advice and consent.
7. The Office of Hearings and Appeals (OHA) is an independent adjudicatory office within the Office of the Secretary. Led by a Director who is appointed by the Secretary, it supervises the Administrative Judges of the Office of Appeals, the administrative law judges of the Office of Administrative Law Judges, and the OHA support staff. The HUD Secretary appoints administrative judges and administrative law judges in accordance with the Administrative Procedure Act, 5 U.S.C. Chapter 5, <https://www.law.cornell.edu/uscode/text/5/part-I/chapter-5> (accessed March 4, 2023).
8. HUD currently has a Departmental Equity Assessment Working Group, supported with five FTEs funded by the OSDDBU, “as part of the President’s Executive Order 13985, Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.” See U.S. Department of Housing and Urban Development, *2023 Congressional Justifications*, p. 35-15, <https://www.hud.gov/sites/dfiles/CFO/documents/2023HUDCongressionalJustificationsFINALElectronicversion.pdf> (accessed March 4, 2023), and President Joseph R. Biden Jr., Executive Order 13985, “Advancing Racial Equity and Support for Underserved Communities Through the Federal Government,” January 20, 2021, in *Federal Register*, Vol. 86, No. 14 (January 25, 2021), pp. 7009–7013, <https://www.govinfo.gov/content/pkg/FR-2021-01-25/pdf/2021-01753.pdf> (accessed March 4, 2023).
9. Interestingly, “[t]he 2023 President’s Budget requests \$748 thousand for CFBNP, which is \$436 thousand less than the 2022 Annualized CR level. The Budget reflects total funding (carryover and new authority) of \$1.2 million, \$448 thousand less than 2022 total funding.” U.S. Department of Housing and Urban Development, *2023 Congressional Justifications*, p. 35-16.
10. See H.R. 558, Stewart B. McKinney Homeless Assistance Act, Public Law No. 100-77, 100th Congress, July 22, 1987, <https://www.govinfo.gov/content/pkg/STATUTE-101/pdf/STATUTE-101-Pg482.pdf> (accessed March 5, 2023). Later renamed the McKinney-Vento Homeless Assistance Act.
11. Established under the Housing and Community Development Act of 1974, 42 U.S.C. §§ 5301 et seq., <https://www.law.cornell.edu/uscode/text/42> (accessed March 4, 2023).
12. S. 566, Cranston-Gonzalez National Affordable Housing Act, Public Law No. 101-625, 101st Congress, November 28, 1990, Title II, <https://www.congress.gov/101/statute/STATUTE-104/STATUTE-104-Pg4079.pdf> (accessed March 5, 2023).
13. S. 1, Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, Public Law No. 91-646, 91st Congress, January 2, 1971, <https://www.congress.gov/91/statute/STATUTE-84/STATUTE-84-Pg1894.pdf> (accessed March 4, 2023). “The URA establishes the minimum Federal requirements for the acquisition of real property for Federally-funded programs and projects, and for the relocation of persons who must move from

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- their homes, businesses, or farms as a direct result of acquisition, rehabilitation, or demolition for a Federally-funded program or project.” U.S. Department of Housing and Urban Development, HUD Exchange, “49 CFR Part 24—URA Regulations,” published February 2005, <https://www.hudexchange.info/resource/804/ura-and-real-property-acquisition-policies-act-49-cfr-part-24/> (accessed March 4, 2023). HUD is one of the 18 federal departments and agencies that “are subject to the Uniform Act.” U.S. Department of Transportation, Federal Highway Administration, “Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally Assisted Programs,” *Federal Register*, Vol. 84, No. 243 (December 18, 2019), pp. 69466–69521, esp. p. 69484, <https://www.govinfo.gov/content/pkg/FR-2019-12-18/pdf/2019-25558.pdf> (accessed March 4, 2023).
14. H.R. 3219, Native American Housing Assistance and Self-Determination Act of 1996, Public Law No. 104-330, 104th Congress, October 26, 1996, <https://www.congress.gov/104/plaws/publ330/PLAW-104publ330.pdf> (accessed March 4, 2023).
 15. U.S. Department of Housing and Urban Development, *2023 Congressional Justifications*, p. 6-1. The U.S. Housing Act of 1937 (Wagner–Steagall Act) established the origins of locally chartered housing agencies that administer federal funding for various rental assistance programs—a quintessentially progressive New Deal-era policy that expanded the administrative state’s powers to the housing market—with the primary legislative intent of eradicating slum housing in urban areas, boosting jobs, and providing housing for the working poor. 42 U.S.C. §§ 1437 et seq., <https://www.law.cornell.edu/uscode/text/42> (accessed March 4, 2023). A decade later, the Housing Act of 1949 codified federal standards for housing livability—a rationale that HUD and federal legislators have continued to use to justify federal intervention in housing—establishing as a national policy objective the provision of a minimum standard of housing quality for all Americans. This legislation also statutorily established many of the rural housing programs that are administered at USDA and expanded programs facilitating the removal of slum housing in urban areas. 42 U.S.C. §§ 1441 et seq., <https://www.law.cornell.edu/uscode/text/42> (accessed March 4, 2023).
 16. U.S. Department of Housing and Urban Development, *2023 Congressional Justifications*, pp. 1-2 and 2-2.
 17. The National Housing Act of 1934 established the FHA and the statutory authority for the secondary market. The main stated premise was to stimulate jobs and facilitate the housing and construction sector during the Great Depression. 42 U.S.C. §§ 1701 et seq., <https://www.law.cornell.edu/uscode/text/42> (accessed March 4, 2023).
 18. 42 U.S.C. §§ 2000d et seq., <https://www.law.cornell.edu/uscode/text/42> (accessed March 4, 2023).
 19. 29 U.S.C. §§ 701 et seq., <https://www.law.cornell.edu/uscode/text/29> (accessed March 4, 2023).
 20. HUD’s Departmental Enforcement Center (DEC) is led by a Director. It was established in 1998 as part of a broader effort to streamline and consolidate functions at HUD and was later merged with the Office of General Counsel. The DEC “is comprised of the Office of the Director, the Compliance Division, the Operations Division and five Satellite Offices” and describes its mission as “assuring the highest standards of ethics, management and accountability in the resolution of HUD’s troubled properties.” U.S. Department of Housing and Urban Development, Departmental Enforcement Center, “Program Offices: Departmental Enforcement Center,” https://www.hud.gov/program_offices/enforcement (accessed March 4, 2023).
 21. H.R. 5334, Housing and Community Development Act of 1992, Public Law No. 102-1017, 102nd Congress, October 28, 1992, Title X, <https://www.congress.gov/102/statute/STATUTE-106/STATUTE-106-Pg3672.pdf> (accessed March 4, 2023).
 22. H.R. 8588, Inspector General Act of 1978, Public Law No. 95-452, 95th Congress, October 12, 1978, <https://www.congress.gov/95/statute/STATUTE-92/STATUTE-92-Pg1101.pdf> (accessed March 4, 2023).
 23. Guiding questions: What immediate administrative reforms of HUD and its programs can be made with high probability of success? What short-term legislative reforms can be proposed that, in tandem with administrative reforms, would achieve the HUD vision/mission objective? What HUD offices should be eliminated and/or realigned to reduce any redundancy that may persist in programmatic functions?
 24. Wholly aside from reforms that would require legislation, the next Administration must ensure that key political appointees are able to acquit themselves as change agents to execute administrative reforms. Otherwise, whether because of a sheer lack of skill and expertise or simply a lack of will and philosophical alignment with reforms, staff may frustrate the efforts of committed political appointee staff and leadership to execute substantive administrative reforms. To achieve the policy and regulatory reforms outlined in this chapter, political appointees must be carefully placed in positions that reflect not only technical, market/industry, and operational expertise, but also a shared will and commitment.

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25. Process must prioritize where political leadership can implement administrative reforms through regulatory action and subregulatory guidance reforms.
26. China and other foreign nations should not be able to disrupt our nation's housing markets, including by artificially driving up prices and reducing affordability and access to housing for Americans who are crowded out of the market by such market participation.
27. These initiatives are maintained under such designations as diversity, equity, and inclusion (DEI); critical race theory (CRT); black, indigenous, Pacific Islander, and other people of color (BIPOC); and environmental, social, and governance (ESG).
28. At a minimum, these efforts duplicate what the federal government already collects and assesses; at worst, they institute arbitrary procedures in real estate appraisal practices that undermine integrity and perversely introduce arbitrary biases into what should be an unbiased system for determining financial value.
29. Revise regulatory and subregulatory guidance, where applicable within statutory authorities, that adds unnecessary delay and costs to the construction and development of new housing and has been estimated to account for about 40 percent of new housing unit costs in multifamily housing.
30. The Biden Administration has issued a proposed rule to replace the Trump Administration's "Preserving Community and Neighborhood Choice" rule that had repealed earlier rules expanding AFFH enforcement. See U.S. Department of Housing and Urban Development, Office of Fair Housing, "Preserving Community and Neighborhood Choice," Final Rule, *Federal Register*, Vol. 85, No. 153 (August 7, 2020), pp. 47899–47912, <https://www.govinfo.gov/content/pkg/FR-2020-08-07/pdf/2020-16320.pdf> (accessed March 5, 2023), and U.S. Department of Housing and Urban Development, Office of the Secretary, "Affirmatively Furthering Fair Housing," Proposed Rule, *Federal Register*, Vol. 88, No. 27 (February 9, 2023), pp. 8516–8590, <https://www.govinfo.gov/content/pkg/FR-2015-07-16/pdf/2015-17032.pdf> (accessed March 5, 2023).
31. Certain pilot initiatives may encourage greater take-up of loan products designed for faster equity accumulation, including loans with shorter terms and accelerated amortization schedules. In concept, the FHA's Home Equity Accelerator Loan (HEAL) and Good Neighbor Next Door (GNND) pilot initiatives might lead to meaningful wealth generation for first-time buyers, but they should be available to all eligible households only when they do not arbitrarily discriminate based on race or other characteristics.
32. Housing supply does remain a problem in the U.S., but constructing more units at the low end of the market will not solve the problem. Investors and developers can deliver at more efficient cost new units that will allow for greater upward mobility of rental and ownership housing stock and better target increased construction of mid-tier rental units. Further, and more fundamental to the housing supply challenge in markets across the U.S., localities can consider revising land use, zoning, and building regulations that constrict new housing development, adding time delays and costs that impede construction. Federal housing policy should get out of the way where possible and minimize the distortive impact that stimulating greater demand through loose lending can have in driving up housing prices for households that are looking for affordable entry into the housing market.
33. U.S. Department of Housing and Urban Development, Office of the Secretary, "Housing and Community Development Act of 1980: Verification of Eligible Status," Proposed Rule, *Federal Register*, Vol. 84, No. 91 (May 10, 2019), pp. 20589–20595, <https://www.govinfo.gov/content/pkg/FR-2019-05-10/pdf/2019-09566.pdf> (accessed March 5, 2023).
34. Reforms should contemplate rent payment flexibilities, allow escrow savings, and set maximum term limits that can reduce implicit penalties for increasing household incomes over eligibility terms for housing assistance and reweight waiting-list prioritization for two-parent households.
35. Some PHAs have been able to implement work requirements and term limit policies in various congressionally authorized demonstration programs, notably the Moving to Work (MTW) demonstration program established in 1996 for 39 PHAs (Congress has since authorized another 100 PHAs) in which participating MTW PHAs were given authority to implement rent reforms, work requirements and other experimental policies in rental assistance programs along with flexibilities in the use of capital and operating appropriations.
36. The FSS program has a general five-year term with a possible two-year extension, which could be applied at the term limit for overall benefits, and certain PHAs have imposed five-year to seven-year term limits. Families in these programs build escrow savings during their term eligibility that helps to facilitate successful transitions to family self-sufficiency and unassisted housing.

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37. HUD should implement administrative changes in regulation and guidance and seek statutory authority to end all Housing First directives of Continuum of Care (CoC) grantees and contract homelessness providers in addition to establishing restrictions on local Housing First policies where HUD grant funds are used.
38. The U.S. Interagency Council on Homelessness (USICH) was established in the 1990s, and numerous Administrations have devoted enormous resources to the Housing First model, experimenting with various ways to provide federally financed rapid rehousing and permanent housing opportunities. Housing First is a far-left idea premised on the belief that homelessness is primarily circumstantial rather than behavioral. The Housing First answer to homelessness is to give someone a house instead of attempting to understand the underlying causes of homelessness. Federal intervention centered on Housing First has failed to acknowledge that resolving the issue of homelessness is often a matter of resolving mental health and substance abuse challenges. Instead of the permanent supportive housing proffered by Housing First, a conservative Administration should shift to transitional housing with a focus on addressing the underlying issues that cause homelessness in the first place.
39. The Senate Low-Income First-Time Homebuyers (LIFT) Act would address this policy goal. See S. 2797, Low-Income First-Time Homebuyers Act of 2021 (LIFT Homebuyers Act of 2021), 117th Congress, introduced September 22, 2021, <https://www.congress.gov/117/bills/s2797/BILLS-117s2797is.pdf> (accessed March 5, 2023).
40. FHA did not facilitate the widespread use of 30-year mortgages until the 1950s when, interacting with Federal Reserve policies, federal agencies began broader adoption of the mortgages, which, despite lowering the monthly repayment terms, result in slow equity accumulation and wealth-building opportunities.
41. The Housing and Economic Recovery Act of 2008 fundamentally revised the scope of federal regulation in the nation's housing finance system, placing Fannie Mae and Freddie Mac under the purview of a newly established Federal Housing Finance Agency (FHFA) and establishing a Housing Trust Fund (HTF) that is administered in the HUD Office of Community Planning and Development. See H.R. 3221, Housing and Economic Recovery Act of 2008, Public Law No. 110-289, 110th Congress, July 30, 2008, <https://www.congress.gov/110/plaws/publ289/PLAW-110publ289.pdf> (accessed March 5, 2023).
42. Guiding questions: What reforms should be proposed that could be accomplished within five years? What reforms can be done administratively, and what reforms would need legislative authorization? Are there functions that HUD administers that could be achieved more effectively at another department or agency? What big-picture reforms should be proposed that might take more than five years that would reorganize HUD and its programs to meet the objectives in the vision or mission? What would occur in the absence of these public finance subsidies? How much crowd-out do these subsidies create in the market? Would America be a seriously underhoused nation without these subsidies? Who are the policies intended to benefit? What organizational changes must be made?
43. The Faircloth Amendment (Quality Housing and Work Responsibility Act of 1998) amended the Housing Act of 1937 to maintain public housing units at 1999 levels, preventing housing authorities from maintaining more public housing than they did then. H.R. 4194, Departments of Veterans Affairs and Housing and Urban Development, and Independent Agencies Appropriations Act, 1999, Public Law No. 105-276, 105th Congress, October 21, 1998, Title V, <https://www.congress.gov/105/plaws/publ276/PLAW-105publ276.pdf> (accessed March 5, 2023). In recent years, the statutory restriction on new construction of public housing units has been circumvented through some narrow uses of preservation programs such as the Rental Assistance Demonstration (RAD) program, initially authorized in 2012 and reauthorized several times since under higher program unit conversion caps. Congress also provided paths for renewal and continuation of a portion of existing public housing; project/site-based housing stock (refinancing with long-term HAP contract commitments); and Section 8 units through the Multifamily Assisted Housing Reform and Affordability Act of 1997 (MAHRA). H.R. 2158, Departments of Veterans Affairs and Housing and Urban Development, and Independent Agencies Appropriations Act, 1998, Public Law No. 105-65, 105th Congress, October 27, 1997, Title V, <https://www.congress.gov/105/plaws/publ65/PLAW-105publ65.pdf> (accessed March 5, 2023).
44. As the evolution of HUD rental assistance transitions away from the public housing model toward housing choice vouchers, there should be adequate landlord participation to ensure that the supply of housing units for rent in these programs meets the demand for rent among eligible tenants. This issue has been addressed in various ways, including by a task force instituted at the department during the Trump Administration, but could likely remain a challenge in the administration of the program.



CONTRA COSTA COUNTY

1025 ESCOBAR STREET
MARTINEZ, CA 94553

Staff Report

File #: 24-4019

Agenda Date: 12/3/2024

Agenda #: D.3

To: Contra Costa County Housing Authority Board of Commissioners

From: Joseph Villarreal, Executive Director

Report Title: GOVERNMENT CODE 7507 - CHIEF EXECUTIVE OFFICER ACKNOWLEDGEMENT OF FUTURE COSTS OF BENEFITS - PROPOSED CHANGES FOR SPECIFIC RETIREES

☐ Recommendation of the County Administrator ☐ Recommendation of Board Committee

RECOMMENDATIONS:

ACCEPT that this Board Order serves as written acknowledgment by the Executive Director (chief executive officer) that he understands the current and future cost of the negotiated health care benefit changes for retirees from both represented and unrepresented classes, as detailed in a report provided by the Housing Authority's (HACCC) Actuary on September 10, 2024 (attached).

BACKGROUND:

At its meeting on September 10, 2024, the Board of Commissioners accepted an actuarial valuation of future annual costs of negotiated and proposed changes to Other Post-Employment Benefits for current and future employees and retirees. The report containing the actuarial valuation of the proposed health care benefit changes was provided to HACCC on August 15, 2024.

Section 7507 requires that "upon the adoption of any benefit change to which this section applies, the person with the responsibilities of a chief executive officer in an entity providing the benefit, however that person is denominated, shall acknowledge in writing that he or she understands the current and future cost of the benefit as determined by the actuary." As the Executive Director (chief executive officer), by approving this Board Order, I acknowledge in writing that I understand the current and future cost of the benefit changes presented to you today, as determined by the actuary and contained in the actuary's report provided to HACCC on August 15, 2024.

FISCAL IMPACT:

As shown in the valuation, the result of the proposed health care benefit changes, if implemented for all current and future eligible retirees, will create a \$21,292 increase in the Annual Required Contribution, a \$8,433 increase in the Normal Cost, and a \$144,838 increase in the total Actuarial Accrued Liability.

CONSEQUENCE OF NEGATIVE ACTION:

If the Executive Director does not make and sign this acknowledgment, HACCC will be in violation of California Government Code Section 7507 and the proposed health care benefits may not be adopted.

Projection of Actuarially Determined Contribution (ADC)

Table 1 presents a five-year projection based on these assumptions: There are no plan changes, the Authority contributes according to the Funding Policy, assets earn 6.50% per year, the discount rate remains 6.50%, and the normal cost component of the ADC increases 5.00% per year throughout the five-year period. Table 2 shows the trust contribution net of estimated benefit payments.

Table 1 Projected ADC - Before Proposed Change in Benefit Terms

Plan Year	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029
Actuarially Accrued Liability	\$ 11,815,156	\$ 12,612,065	\$ 13,375,126	\$ 14,127,917	\$ 15,746,840
Actuarial Value of Assets	<u>3,987,111</u>	<u>5,011,784</u>	<u>6,035,878</u>	<u>7,085,308</u>	<u>8,209,727</u>
Unfunded AAL	\$ 7,828,045	\$ 7,600,281	\$ 7,339,248	\$ 7,042,609	\$ 7,537,113
Amortization Period (Years)	15	14	13	12	11
Normal Cost End of Year	\$ 605,211	\$ 635,472	\$ 667,246	\$ 700,608	\$ 735,638
Amortization of UAAL	694,995	711,949	729,026	746,164	857,634
Trust Administration Expense	<u>12,360</u>	<u>15,537</u>	<u>18,711</u>	<u>21,964</u>	<u>25,450</u>
Actuarially Determined Contribution	\$ 1,312,566	\$ 1,362,958	\$ 1,414,983	\$ 1,468,736	\$ 1,618,722
Discount Rate	6.50%	6.50%	6.50%	6.50%	6.50%
Expected Return	6.50%	6.50%	6.50%	6.50%	6.50%
Normal Cost Growth Rate	5.00%	5.00%	5.00%	5.00%	5.00%
Trust Administration Expense	0.31%	0.31%	0.31%	0.31%	0.31%
Salary Scale	3.00%	3.00%	3.00%	3.00%	3.00%

Table 2 Projected Funding Policy Contribution – Before Proposed Change

Plan Year	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029
Est. Net Trust Contribution	\$ 754,142	\$ 692,219	\$ 655,441	\$ 665,260	\$ 770,008
Est. Pay-go	442,343	509,789	568,037	612,483	656,638
Est. Implied Subsidy	<u>116,081</u>	<u>160,950</u>	<u>191,505</u>	<u>190,993</u>	<u>192,076</u>
Funding Policy Contribution	\$ 1,312,566	\$ 1,362,958	\$ 1,414,983	\$ 1,468,736	\$ 1,618,722

Projection of Actuarially Determined Contribution (ADC)

Tables 3 and 4 show the impact of the proposed amendment on the same projected amounts as Tables 1 and 2.

Table 3 Projected ADC – After Proposed Change in Benefit Terms

Plan Year	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029
Actuarially Accrued Liability	\$ 11,959,994	\$ 12,774,751	\$ 13,554,328	\$ 14,317,866	\$ 15,958,897
Actuarial Value of Assets	<u>3,987,111</u>	<u>5,033,757</u>	<u>6,079,106</u>	<u>7,144,681</u>	<u>8,279,914</u>
Unfunded AAL	\$ 7,972,883	\$ 7,740,994	\$ 7,475,222	\$ 7,173,185	\$ 7,678,983
Amortization Period (Years)	15	14	13	12	11
Normal Cost End of Year	\$ 613,644	\$ 644,326	\$ 676,542	\$ 710,369	\$ 745,887
Amortization of UAAL	707,854	725,130	742,532	759,999	873,777
Trust Administration Expense	<u>12,360</u>	<u>15,605</u>	<u>18,845</u>	<u>22,149</u>	<u>25,668</u>
Actuarially Determined Contribution	\$ 1,333,858	\$ 1,385,061	\$ 1,437,919	\$ 1,492,517	\$ 1,645,332
Discount Rate	6.50%	6.50%	6.50%	6.50%	6.50%
Expected Return	6.50%	6.50%	6.50%	6.50%	6.50%
Normal Cost Growth Rate	5.00%	5.00%	5.00%	5.00%	5.00%
Trust Administration Expense	0.31%	0.31%	0.31%	0.31%	0.31%
Salary Scale	3.00%	3.00%	3.00%	3.00%	3.00%

Table 4 Projected Funding Policy Contribution – After Proposed Change

Plan Year	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029
Est. Net Trust Contribution	\$ 775,434	\$ 711,499	\$ 668,497	\$ 672,184	\$ 779,360
Est. Pay-go	442,343	512,612	577,917	629,340	673,896
Est. Implied Subsidy	<u>116,081</u>	<u>160,950</u>	<u>191,505</u>	<u>190,993</u>	<u>192,076</u>
Funding Policy Contribution	\$ 1,333,858	\$ 1,385,061	\$ 1,437,919	\$ 1,492,517	\$ 1,645,332

The proposed change in benefit terms is to increase over a 3-year period the employer subsidy of retiree medical benefits from 70% to 75% of the Bay Area Kaiser pre-Medicare premium.

Projection of Actuarially Determined Contribution (ADC)

Proposed Amendment:

Beginning on January 1, 2025, HACCC will contribute a larger share of the cost of retiree and dependent medical costs. The current employer subsidy is capped at 70% of the CalPERS Kaiser Region 1 pre-Medicare rate.

Calendar Year	Percent Contribution	
	Current	Proposed
2025	70%	71%
2026	70%	73%
2027 and after	70%	75%

Current and Proposed Cap is Subject to Health Trend:

Since the HACCC contribution is a percentage of a medical premium rate, we have assumed the cap would increase with health trend.

CalPERS refers to pre-Medicare plans as "Basic" plans.

A projection of Maximum Benefits:

Calendar Year	% of Kaiser Premium	Retiree	Retiree+1
2024	70%	\$ 715	\$ 1,430
2025	71%	790	1,580
2026	73%	851	1,702
2027	75%	915	1,831
2028	75%	983	1,966
2029	75%	1,054	2,108

Calendar Year	Basic Trend	Medicare Trend
2025	7.85%	5.75%
2026	7.70%	5.65%
2027	7.55%	5.55%
2028	7.40%	5.45%
2029	7.25%	5.35%
2030	7.10%	5.25%
2031	6.95%	5.15%
2032	6.80%	5.05%
2033	6.65%	4.95%
2034	6.50%	4.85%
2035	6.35%	4.75%
2036	6.20%	4.65%
2037	6.05%	4.55%
2038	5.90%	4.50%
2039	5.75%	4.50%
2040	5.60%	4.50%
2041	5.45%	4.50%
2042	5.30%	4.50%
2043	5.15%	4.50%
2044 and later	5.00%	4.50%

Effect of the Amendment

We measured the effect of the proposed amendment if reflected as of July 1, 2024 for the 2024-2025 plan year. The proposed plan amendment would increase the Actuarial Accrued Liability by \$144,838 (or 1.2%) from \$11,815,156 to \$11,959,994. This relatively small 1.2% increase relative to the subsidy increase (5%) is because post-Medicare plan benefits represent 2/3rds of the \$12M plan liability and unimpacted by the change (i.e., Medicare premiums are less than half the cost of Kaiser Basic premiums, which is well under the current 70% cost-share let alone a 75% cost-share).



CONTRA COSTA COUNTY

1025 ESCOBAR STREET
MARTINEZ, CA 94553

Staff Report

File #: 24-4020

Agenda Date: 12/3/2024

Agenda #: D.4

To: Contra Costa County Housing Authority Board of Commissioners

From: Joseph Villarreal, Executive Director

Report Title: APPROVE HEALTH CARE BENEFIT ENHANCEMENTS FOR REPRESENTED AND UNREPRESENTED EMPLOYEES

☐ Recommendation of the County Administrator ☐ Recommendation of Board Committee

RECOMMENDATIONS:

ADOPT Resolution No. 5264 approving the health care benefits portion of the Successor Memorandum of Understanding with Public Employees Union, Local #1/AFSCME, for the term of July 1, 2024, through June 30, 2027.

ADOPT Resolution No. 5265 approving health care benefits for the unrepresented employees of the Housing Authority of the County of Contra Costa.

BACKGROUND:

On July 9, 2024, this Board adopted Resolution No. 5260 approving the Successor Memorandum of Understanding (MOU) with Public Employees Union, Local #1/AFSCME (Union), providing for wages, non-healthcare benefits, and other employment conditions for the term of July 1, 2024, through June 30, 2027. Similarly, on July 9, 2024, this Board adopted Resolution No. 5261 regarding compensation and non-healthcare benefits for the unrepresented employees of the Housing Authority of the County of Contra Costa.

On June 26, 2024, a Tentative Agreement with the Union was signed that included a change to the health care subsidy paid by HACCC from a flat amount to a percentage payment. Specifically, the TA provided that HACCC will pay the following percentages of the premium for the CalPERS Kaiser Premium plan, towards all health plans offered by CalPERS:

- 71% Effective January 1, 2025
- 73% Effective January 1, 2026
- 75% Effective January 1, 2027

Any excess amounts necessary to pay the health care premium in full shall be paid for by the Employee through payroll deductions. The proposed change to the health care subsidy was not included in either the Successor MOU or the compensation package for unrepresented employees, because HACCC was awaiting an actuarial analysis of the change as required by State law.

As required by California Government Code, Section 7507, the actuarial report that considered the future costs of changes in retirement benefits, or other post-employment benefits was provided to this Board at the September 10, 2024, meeting. This meeting was more than two weeks ago, so it is appropriate to consider

adoption of the proposed health care benefit changes for current employees and current and future retirees who are eligible for health care coverage at today's meeting. HACCC's Actuary will be in attendance if there are any questions about the report.

FISCAL IMPACT:

As shown in the attached actuarial valuation, the result of the health care plan changes described herein, if implemented for all current and future eligible retirees, will create a \$21,292 increase in the Annual Required Contribution, a \$8,433 increase in the Normal Cost, and a \$144,838 increase in the total Actuarial Accrued Liability.

CONSEQUENCE OF NEGATIVE ACTION:

It is expected that the Union will seek to reopen negotiations concerning health care reimbursements.

THE BOARD OF COMMISSIONERS
HOUSING AUTHORITY OF THE COUNTY OF CONTRA COSTA

RESOLUTION NO. 5264

A RESOLUTION OF THE BOARD OF COMMISSIONERS
OF THE HOUSING AUTHORITY OF THE COUNTY OF CONTRA COSTA
APPROVING THE HEALTH CARE BENEFITS PORTION OF THE SUCCESSOR
MEMORANDUM OF UNDERSTANDING WITH PUBLIC EMPLOYEES UNION, LOCAL
#1/AFSCME, FOR THE TERM OF JULY 1, 2024, THROUGH JUNE 30, 2027

WHEREAS, on June 26, 2024, a Tentative Agreement with Public Employees Union, Local #1/AFSCME (Union) was signed that included an increase to the health care subsidy percentage payment; and

WHEREAS, on July 9, 2024, the Board of Commissioners adopted Resolution No. 5260 approving the Successor Memorandum of Understanding (MOU) with the Union providing for wages, non-healthcare benefits, and other employment conditions for the term of July 1, 2024, through June 30, 2027; and

WHEREAS, pursuant to California Government Code section 7507, the negotiated healthcare benefits could not be approved until the services of an enrolled actuary were secured to provide a statement of the actuarial impact upon future annual costs of the negotiated benefits; and

WHEREAS, the statement of the enrolled actuary of the actuarial impact upon future annual costs of the negotiated healthcare benefits was discussed at a public meeting of the Board of Commissioners on September 10, 2024;

NOW, THEREFORE, BE IT RESOLVED, by the Board of Commissioners of the Housing Authority of the County of Contra Costa, as follows:

1. The Board of Commissioners authorizes the negotiated healthcare benefits with the Union for the term of July 1, 2024, through June 30, 2027; and,
2. The actuarial impact upon future annual costs of the negotiated healthcare benefits was made public at a public meeting of the Board of Commissioners on September 10, 2024 in accordance with California Government Code section 7507; and
3. The Authority is directed to forward a copy of this resolution to the Contra Costa County Employees Retirement Association; and
4. The Authority is directed to forward a copy of this resolution to CalPERS.

PASSED AND ADOPTED ON _____ by
the following vote of the Commissioners.

AYES:

NOES:

ABSENT:

ABSTAIN:

I HEREBY CERTIFY THAT THIS IS A
TRUE AND CORRECT COPY OF AN
ACTION TAKEN AND ENTERED ON THE
MINUTES OF THE BOARD OF
COMMISSIONERS ON THE DATE SHOWN.

ATTESTED _____
JOSEPH VILLARREAL, CLERK OF THE
BOARD OF COMMISSIONERS
AND EXECUTIVE DIRECTOR

By _____

THE BOARD OF COMMISSIONERS
HOUSING AUTHORITY OF THE COUNTY OF CONTRA COSTA

RESOLUTION NO. 5265

A RESOLUTION OF THE BOARD OF COMMISSIONERS
OF THE HOUSING AUTHORITY OF THE COUNTY OF CONTRA COSTA
APPROVING HEALTH CARE BENEFITS FOR THE UNREPRESENTED EMPLOYEES
OF THE HOUSING AUTHORITY OF THE COUNTY OF CONTRA COSTA

WHEREAS, on July 9, 2024, the Board of Commissioners adopted Resolution No. 5261 regarding compensation and non-healthcare benefits for the unrepresented employees of the Housing Authority of the County of Contra Costa; and

WHEREAS, pursuant to CA Government Code section 7507, the proposed healthcare benefits for the unrepresented employees could not be approved until the services of an enrolled actuary were secured to provide a statement of the actuarial impact upon future annual costs of the negotiated benefits; and

WHEREAS, the statement of the enrolled actuary of the actuarial impact upon future annual costs of the proposed healthcare benefits was discussed at a public meeting of the Board of Commissioners on September 10, 2024;

NOW, THEREFORE, BE IT RESOLVED, by the Board of Commissioners of the Housing Authority of the County of Contra Costa, as follows:

1. The Board of Commissioners authorizes the proposed healthcare benefits for the unrepresented employees of the Housing Authority of the County of Contra Costa; and,
2. The Authority acknowledges that the statement of the enrolled actuary of the actuarial impact upon future annual costs of the proposed healthcare benefits was made public at a public meeting of the Board of Commissioners on September 10, 2024 in accordance with CA Government Code section 7507; and
3. The Authority is directed to forward a copy of this resolution to the Contra Costa County Employees Retirement Association; and
4. The Authority is directed to forward a copy of this resolution to CalPERS.

PASSED AND ADOPTED ON _____ by
the following vote of the Commissioners.

AYES:

NOES:

ABSENT:

ABSTAIN:

I HEREBY CERTIFY THAT THIS IS A
TRUE AND CORRECT COPY OF AN
ACTION TAKEN AND ENTERED ON THE
MINUTES OF THE BOARD OF
COMMISSIONERS ON THE DATE SHOWN.

ATTESTED _____
JOSEPH VILLARREAL, CLERK OF THE

BOARD OF COMMISSIONERS
AND EXECUTIVE DIRECTOR

By _____



CONTRA COSTA COUNTY

1025 ESCOBAR STREET
MARTINEZ, CA 94553

Staff Report

File #: 24-4017

Agenda Date: 12/3/2024

Agenda #: C.1

To: Contra Costa County Housing Authority Board of Commissioners

From: Joseph Villarreal, Executive Director

Date: December 3, 2024

Report Title: 2025 Meeting Schedule

RECOMMENDATIONS:

ADOPT the proposed 2025 meeting schedule for the Housing Authority of the County of Contra Costa Board of Commissioners, which has been coordinated with the Contra Costa County Board of Supervisors and the Contra Costa County Fire Protection District Board of Directors:

March 11th

May 20th

July 8th

September 9th

December 9th

BACKGROUND:

Each year, the Board of Commissioners adopts a meeting schedule that designates regular meeting dates and any dates on which meetings must be canceled in anticipation that a quorum of the Board will not be present. The proposed meeting schedule provides five meetings for the Board of Commissioners and has been coordinated with the Contra Costa County Board of Supervisors and the Contra Costa County Fire Protection District. The proposed meeting schedule recognizes the time demands on the Board members due to their participation on committees, and numerous regional and local legislative bodies and task forces, which require preparation, attendance, and involve travel. There are legal provisions to schedule a special meeting to address any urgent need that cannot be accommodated in the standing meeting schedule. The 2025 proposed meeting schedule has been prepared in consultation with the incoming Board Chair and the County Administrator and is recommended for the Board's adoption. The Board of Supervisors has already adopted its schedule.

FISCAL IMPACT:

No fiscal impact

CONSEQUENCE OF NEGATIVE ACTION:

Staff will not be able to advance plan for meetings.



CONTRA COSTA COUNTY

1025 ESCOBAR STREET
MARTINEZ, CA 94553

Staff Report

File #: 24-3999

Agenda Date: 12/3/2024

Agenda #: C.2

To: Contra Costa County Housing Authority Board of Commissioners

From: Joseph Villarreal, Executive Director

Report Title: CONTRACT WITH MONIZ ARCHITECTURE FOR ARCHITECTURAL AND ENGINEERING SERVICES AT 2601 SOMERSVILLE ROAD, ANTIOCH, CALIFORNIA.

☐ Recommendation of the County Administrator ☐ Recommendation of Board Committee

RECOMMENDATIONS:

APPROVE and AUTHORIZE the Housing Authority of the County of Contra Costa's (HACCC) Executive Director, or his designee, to execute a contract with Moniz Architecture (Moniz) to provide architectural and engineering services for the Housing Choice Voucher satellite office at 2601 Somersville Road in Antioch, CA in a total amount of \$255,644.

BACKGROUND:

2601 Somersville Road, Antioch (APN 076-432-003) is a former Wells Fargo office building, recently purchased by HACCC to serve as an East-County satellite office for administration of the Housing Choice Voucher (HCV) program. Significant interior and exterior modifications are required for program operation. Modifications include reconfiguring of interior spaces, electrical, plumbing, and HVAC improvements. Exterior modifications include new roofing, painting, parking, landscaping and ADA improvements.

Housing authorities are allowed to enter into intergovernmental purchasing agreement without competitive procurement to secure certain services (piggyback). Intergovernmental purchasing agreements foster greater economy and efficiency. Moniz was determined to qualify for a piggyback contract based on a current, competitively procured contract they have with Placer County.

The architectural/engineering design team has worked extensively with HACCC staff to determine the agency's specific needs for a satellite HCV office, and how best to modify this existing building to accommodate the needs. The architect will be assisted by Civil, Structural, Electrical and Mechanical engineers, as well as other professional consultants to prepare construction documents and assist with the construction phase. These costs are included here. The fee schedule pricing, attached to the proposal, exactly matches that of the piggy-backed master contract for the services to be provided.

FISCAL IMPACT:

This contract is funded by HUD's Housing Choice Voucher Program. The amount of the contract is within the amounts budgeted for this purpose.

CONSEQUENCE OF NEGATIVE ACTION:

If the contract is not approved, HACCC will be unable to perform the necessary modifications to the building and it could jeopardize the agency's efforts to better serve our East-County clients.



CONTRA COSTA COUNTY

1025 ESCOBAR STREET
MARTINEZ, CA 94553

Staff Report

File #: 24-4000

Agenda Date: 12/3/2024

Agenda #: C.3

To: Contra Costa County Housing Authority Board of Commissioners

From: Joseph Villarreal, Executive Director

Report Title: INVESTMENT REPORT FOR THE QUARTER ENDING SEPTEMBER 30, 2024

☐ Recommendation of the County Administrator ☐ Recommendation of Board Committee

RECOMMENDATIONS:

RECEIVE the Housing Authority of the County of Contra Costa's investment report for the quarter September 30th, 2024

BACKGROUND:

California Government Code (CGC) Section 53646 requires the Housing Authority of the County of Contra Costa (HACCC) to present the Board of Commissioners with a quarterly investment report that provides a complete description of HACCC's portfolio. The report is required to show the issuers, type of investments, maturity dates, par values (equal to market value here) and the current market values of each component of the portfolio, including funds managed by third party contractors. It must also include the source of the portfolio valuation (in HACCC's case it is the issuer). Finally, the report must provide certifications that (1) all investment actions executed since the last report have been made in full compliance with the Investment Policy and; (2) HACCC will meet its expenditure obligations for the next six months. (CGC 53646(b)).

The state-mandated report has been amended to indicate the amount of interest earned and how the interest was allocated. The amended report is attached.

In summary, HACCC had \$24,907.85 in interest earnings for the quarter ending September 30th, 2024. That interest was earned within discrete programs and most of the interest earned is available only for use within the program which earned the interest. Further, interest earnings may be restricted to specific purposes within a given program.

The Housing Choice Voucher Program reserve as of 12/31/2013 held in cash and investments was transitioned to HUD held program reserve account.

Non-restricted interest earnings within both the voucher and public housing programs must be used solely within those programs, but such interest earnings can be used for a wider range of purposes within the individual programs. The interest earned in the State and Local fund can be used for any purpose within HACCC's scope of operations.

The interest earned for the quarter ending September 30th, 2024 is shown below. A more detailed report is attached.

Public Housing	Housing Choice Voucher Fund	Central Office	State & Local
Unrestricted Interest Earned	Restricted Interest Earned	Unrestricted Interest Earned	Unrestricted Interest Earned
\$226.32		\$18,402.17	\$6,279.36

FISCAL IMPACT:

None. For reporting purposes only.

CONSEQUENCE OF NEGATIVE ACTION:

Should the Board of Commissioners elect not to accept the investment report it would result in an audit finding of non-compliance and could ultimately affect future funding from the U.S. Department of Housing and Urban Development (HUD).

HOUSING AUTHORITY OF CONTRA COSTA COUNTY

INVESTMENT REPORT : PORTFOLIO HOLDINGS BY TYPE

For Period Ending: 9/30/2024

Issuer	Investment Type	Amount Invested	Yield	Investment Date	Maturity Date	Estimated Value@ Maturity Date
<u>Cantella & Company</u>						
Fidelity Market Reserves	Money Market	73,962.43	4.610%	ongoing	ongoing	73,962.43
State Bank of India	Certificate of Deposit	140,000.00	1.100%	5/28/20	5/28/25	147,704.22
Texas Exchange Bank	Certificate of Deposit	105,000.00	1.000%	6/19/20	6/19/25	110,252.88
State Bank of India	Certificate of Deposit	105,000.00	1.000%	4/27/21	4/27/26	110,252.88
Sally Mae Bank	Certificate of Deposit	75,000.00	1.050%	9/23/21	9/22/26	78,937.50
Synchrony Bank	Certificate of Deposit	100,000.00	0.950%	9/24/21	9/24/26	104,752.60
Federal Home Loan bank	Govt Agency	115,000.00	1.350%	1/27/22	1/27/26	121,214.25
Federal Home Loan bank	Govt Agency	110,000.00	1.750%	2/04/22	1/27/27	119,588.08
American Express national Bank	Certificate of Deposit	247,000.00	2.000%	3/09/22	3/09/27	271,713.53
Capital One Bank, USA	Certificate of Deposit	230,000.00	2.250%	3/23/22	3/23/27	255,889.18
BMO Harris Bank	Certificate of Deposit	150,000.00	3.300%	6/15/22	6/15/27	174,763.56
Morgan Stanley Bank	Certificate of Deposit	150,000.00	3.750%	6/30/22	6/30/27	178,140.41
Discover Bank	Certificate of Deposit	140,000.00	3.300%	7/20/22	7/20/26	158,492.66
Sallie Mae Bank	Certificate of Deposit	173,000.00	3.300%	7/20/22	7/21/25	190,158.28
Federal Home Loan bank	Govt Agency	150,000.00	4.000%	9/02/22	8/25/27	179,884.93
CIBC Bank USA	Certificate of Deposit	150,000.00	4.350%	5/16/23	5/15/28	182,642.88
Texas Trust Credit Union	Certificate of Deposit	150,000.00	5.000%	8/09/23	8/09/27	180,020.55
Greenstate Credit Union	Certificate of Deposit	130,000.00	5.000%	8/29/23	8/29/28	162,535.62
Lineage Bank	Certificate of Deposit	160,000.00	5.000%	1/24/24	1/24/29	200,043.84
Toyota Financial Bank	Certificate of Deposit	100,000.00	4.600%	5/24/24	5/24/29	123,012.60
Federal Home Loan Mort Corp	Govt Agency	720,000.00	4.300%	8/23/24	8/07/29	873,527.67
GRAND TOTALS		3,473,962.43				3,997,490.55

L.A.I.F. (Acct # 25-07-003)	Liquid Account	116,439.18	4.71%	ongoing	ongoing	116,439.18
GRAND TOTALS		3,590,401.61				4,113,929.73

HOUSING AUTHORITY OF CONTRA COSTA COUNTY

INVESTMENT REPORT BY FUND

For Period Ending 9/30/2024

		Amount Invested by Fund:				
Issuer	Amount Invested	Public Housing	Management	Central Office	Housing Choice Voucher	Rental Rehabilitation
<u>Cantella & Company</u>						
Fidelity Market Reserves	73,962.43	2,705.19	11,015.59	60,241.65		
State Bank of India	140,000.00		140,000.00			
Texas Exchange Bank	105,000.00		105,000.00			
State Bank of India	105,000.00			105,000.00		
Sally Mae Bank	75,000.00			75,000.00		
Synchrony Bank	100,000.00	83,487.89		16,512.11		
Federal Home Loan bank	115,000.00			115,000.00		
Federal Home Loan bank	110,000.00			110,000.00		
American Express national Bank	247,000.00			247,000.00		
Capital One Bank, USA	230,000.00			230,000.00		
BMO Harris Bank	150,000.00			150,000.00		
Morgan Stanley Bank	150,000.00			150,000.00		
Discover Bank	140,000.00			140,000.00		
Sallie Mae Bank	173,000.00		173,000.00			
Federal Home Loan bank	150,000.00			150,000.00		
CIBC Bank USA	150,000.00		150,000.00			
Texas Trust Credit Union	150,000.00			150,000.00		
Greenstate Credit Union	130,000.00			130,000.00		
Lineage Bank	160,000.00			160,000.00		
Toyota Financial Bank	100,000.00		100,000.00			
Federal Home Loan Mort Corp	720,000.00			720,000.00		
GRAND TOTALS	3,473,962.43	86,193.08	679,015.59	2,708,753.76	-	-

L.A.I.F. (Acct # 25-07-003)	116,439.18	-	-	-		116,439.18
GRAND TOTALS	3,590,401.61	86,193.08	679,015.59	2,708,753.76	-	116,439.18

HOUSING AUTHORITY OF CONTRA COSTA COUNTY

Report per CGC 53646 CURRENT MARKET VALUE

For Period Ending 9/30/2024

Issuer	Investment Type	Maturity Date	Amount Invested	Current Market Value (at 9/30/24)	Yield
<u>Cantella & Company</u>					
Fidelity Market Reserves	Money Market	ongoing	73,962.43	73,962.43	4.61%
State Bank of India	Certificate of Deposit	5/28/2025	140,000.00	137,055.80	1.10%
Texas Exchange Bank	Certificate of Deposit	6/19/2025	105,000.00	102,571.35	1.00%
State Bank of India	Certificate of Deposit	4/27/2026	105,000.00	100,437.75	1.00%
Sally Mae Bank	Certificate of Deposit	9/22/2026	75,000.00	71,094.00	1.05%
Synchrony Bank	Certificate of Deposit	9/24/2026	100,000.00	94,590.00	0.95%
Federal Home Loan bank	Govt Agency	1/27/2026	115,000.00	111,255.60	1.35%
Federal Home Loan bank	Govt Agency	1/27/2027	110,000.00	105,106.10	1.75%
American Express national Bank	Certificate of Deposit	3/09/2027	247,000.00	236,697.63	2.00%
Capital One Bank, USA	Certificate of Deposit	3/23/2027	230,000.00	221,611.90	2.25%
BMO Harris Bank	Certificate of Deposit	6/15/2027	150,000.00	148,072.50	3.30%
Morgan Stanley Bank	Certificate of Deposit	6/30/2027	150,000.00	149,752.50	3.75%
Discover Bank	Certificate of Deposit	7/20/2026	140,000.00	138,658.80	3.30%
Sallie Mae Bank	Certificate of Deposit	7/21/2025	173,000.00	171,747.48	3.30%
Federal Home Loan bank	Govt Agency	8/25/2027	150,000.00	149,863.50	4.00%
CIBC Bank USA	Certificate of Deposit	5/15/2028	150,000.00	153,496.50	4.35%
Texas Trust Credit Union	Certificate of Deposit	8/09/2027	150,000.00	154,872.00	5.00%
Greenstate Credit Union	Certificate of Deposit	8/29/2028	130,000.00	136,784.70	5.00%
Lineage Bank	Certificate of Deposit	1/24/2029	160,000.00	160,376.00	5.00%
Toyota Financial Bank	Certificate of Deposit	5/24/2029	100,000.00	104,129.00	4.60%
Federal Home Loan Mort Corp	Govt Agency	8/07/2029	720,000.00	715,759.20	4.30%
			3,473,962.43	3,437,894.74	
L.A.I.F. (Acct # 25-07-003)	Liquid Account	ongoing	116,439.18	116,439.18	4.71%
GRAND TOTALS			3,590,401.61	3,554,333.92	

HOUSING AUTHORITY OF CONTRA COSTA COUNTY

Investment Interest Earnings Report

For Period Ending 9/30/2024

150189	Amount Invested	Interest Earned this Qtr	Interest Earned this Quarter by Fund				
			Public Housing	Management	Central	Rental Rehab	Housing Voucher
			Unrestricted	Unrestricted	Unrestricted	Unrestricted	Unrestricted
<u>Cantella & Company</u>							
Fidelity Market Reserves	73,962.43	840.74	30.75	125.22	684.77	-	-
State Bank of India	140,000.00	379.73	-	379.73	-	-	-
Texas Exchange Bank	105,000.00	258.90	-	258.90	-	-	-
State Bank of India	105,000.00	258.90	-	-	258.90		-
Sally Mae Bank	75,000.00	194.18	-	-	194.18	-	-
Synchrony Bank	100,000.00	234.25	195.57	-	38.68		-
Federal Home Loan bank	115,000.00	382.81	-	-	382.81		-
Federal Home Loan bank	110,000.00	474.66	-	-	474.66		-
American Express national Bank	247,000.00	1,218.08	-	-	1,218.08		-
Capital One Bank, USA	230,000.00	1,276.03	-	-	1,276.03		-
BMO Harris Bank	150,000.00	1,220.55	-	-	1,220.55		-
Morgan Stanley Bank	150,000.00	1,386.99	-	-	1,386.99		-
Discover Bank	140,000.00	1,139.18	-	-	1,139.18		-
Sallie Mae Bank	173,000.00	1,407.70		1,407.70			-
Federal Home Loan bank	150,000.00	1,479.45	-	-	1,479.45		-
CIBC Bank USA	150,000.00	1,608.90		1,608.90			-
Texas Trust Credit Union	150,000.00	1,849.32	-		1,849.32		
Greenstate Credit Union	130,000.00	1,602.74	-	-	1,602.74		
Lineage Bank	160,000.00	1,972.60	-	-	1,972.60		
Toyota Financial Bank	100,000.00	1,134.25	-	1,134.25	-		
Federal Home Loan Mort Corp	720,000.00	3,223.23	-		3,223.23		
-	3,473,962.43	23,543.19	226.32	4,914.70	18,402.17	-	-
L.A.I.F. (Acct # 25-07-003)	116,439.18					1,364.66	
GRAND TOTALS	3,590,401.61	24,907.85	226.32	4,914.70	18,402.17	1,364.66	-



CONTRA COSTA COUNTY

1025 ESCOBAR STREET
MARTINEZ, CA 94553

Staff Report

File #: 24-4018

Agenda Date: 12/3/2024

Agenda #: C.4

To: Contra Costa County Housing Authority Board of Commissioners

From: Monica Nino, County Administrator

Report Title: Claims

☒ Recommendation of the County Administrator ☐ Recommendation of Board Committee

RECOMMENDATIONS:

DENY claim filed by Stephan Fobbs.

BACKGROUND:

Stephan Fobbs: Personal injury claim for trip and fall in the amount of \$1,000,000.

FISCAL IMPACT:

No fiscal impact.

CONSEQUENCE OF NEGATIVE ACTION:

Not acting on the claims could extend the claimants' time limits to file actions against the County.