**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. Form HUD-50075-HP is to be completed annually by High Performing PHAs. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA <u>do not</u> 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 <u>both</u> of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) *Small PHA* A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) Housing Choice Voucher (HCV) Only PHA A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment, and does not own or manage public housing.
- (4) *Standard PHA* A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) Troubled PHA A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) Qualified PHA A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A.	PHA Information.						
A.1	PHA Name:City of Glendale, Arizona, Community Housing Division PHA Code:AZ003         PHA Type: □Small □High Performer         PHA Plan for Fiscal Year Beginning: (MM/YYYY):07/2017         PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)         Number of Public Housing (PH) Units155 Number of Housing Choice Vouchers (HCVs)1054         Total Combined1209         PHA Plan Submission Type: □Annual Submission □Revised Annual Submission         Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.         The PHA Annual Plan and policy documents may be obtained on the City of Glendale, Arizona.						
			g a Joint PHA Plan and complete ta	Program(s) not in the	No. of Units in Each Program		
	Participating PHAs	PHA Code	Program(s) in the Consortia	Consortia	PH	HCV	
	Lead PHA:						

В.	Annual Plan Elements					
B.1	Revision of PHA Plan Elements.					
	Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission?					
	Y       N         □       Statement of Housing Needs and Strategy for Addressing Housing Needs.         □       Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.         □       Financial Resources.         □       Rent Determination.         □       Homeownership Programs.         □       Safety and Crime Prevention.         □       Pet Policy.         □       Substantial Deviation.         □       Significant Amendment/Modification					
	<ul> <li>(b) The PHA must submit its Deconcentration Policy for Field Office Review.</li> <li>SEE ATTACHMENT A</li> <li>(c) If the PHA answered yes for any element, describe the revisions for each element below:</li> <li>SEE ATTACHMENT A</li> </ul>					
B.2.	New Activities.					
	(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?					
	Y       N         □       Mixed Finance Nodernization or Development.         □       Mixed Finance Modernization or Development.         □       Demolition and/or Disposition.         □       Conversion of Public Housing to Tenant Based Assistance.         □       Conversion of Public Housing to Project-Based Assistance under RAD.         □       Project Based Vouchers.         □       Units with Approved Vacancies for Modernization.         □       Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).					
	(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.					
	Glendale Community Housing continues to modernize public housing units as they are vacated and as needed. This process includes basic unit turnaround, physical improvements, pest control, and equipment/appliance replacement as needed and as allowed by budgetary restrictions.					

B.3	Progress Report.
	Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.
	<b>Goal</b> : Provided funding exists, maximize the current level of affordable housing for as many low-income, very low-income, and extremely low-income eligible families as possible by maximizing voucher usage.
	<b>Objective:</b> Maintain Unit Months Leased or Housing Assistance Payment subsidy at 98%-100% of available vouchers or budget authority. CHD is on track with more than 99% of vouchers utilized. Budget authority utilization is also on track at 98.9% of funding utilized. <b>Objective:</b> Work to collect HAP overpayments and fraud recovery.
	CHD works internally through promissory note repayment agreements as well as with a collections agency to collect HAP overpayments to landlords and to collect monies owed by tenants for failure to report income or other program violations that affect subsidy amount.
	<ul> <li>Goal: Continue to provide an improved living environment.</li> <li>Objective: Complete inspections on all Section 8 and Public Housing units annually and when otherwise deemed necessary.</li> <li>CHD inspects both Section 8 and Public Housing units timely and in compliance with HUD requirements. CHD encourages landlords and tenants to contact our office with HQS related concerns and schedules "special" inspections as necessary. Policies have been implemented to ensure landlord payments are abated promptly for units not in compliance with HQS and have not been repaired timely. Public Housing undergoes three inspections annually per unit for annual inspection, housekeeping, and preventative maintenance. CHD is working on a list of the most commonly failed HQS items to include with the Annual Inspection Packets to make preparing for the inspection easier for landlords and tenants, and to minimize failed HQS inspections.</li> <li>Objective: Continue to partner with City Public Safety to provide ongoing police support and presence, to continue to lower crime rates in the rental communities.</li> <li>CHD has continued to foster our relationship with the Glendale Police Department on crime prevention measures that will reduce and/or prevent crime rates in the City of Glendale, which in turn affects both Section 8 assisted families and those who live in the Public Housing and Section 8 assisted families as well. The "Knock-and-Talk" program is still in force to give Public Housing residents the opportunity to be introduced to the communities and program expectations by a member of Glendale Housing staff and the Glendale Police Department. Glendale Pol and CHD partner to ensure the housing authority is made aware of the most current resources and referral information available for various services.</li> <li>GHD continue to modernize upits at vaccancy as needed, and to address congring energy afficiency standards in ampliances, windows, exterior</li> </ul>
	CHD continues to modernize units at vacancy as needed, and to address ongoing energy efficiency standards in appliances, windows, exterior doors, heating, cooling and accessibility for disabled tenants. Offline units are requested as needed to complete projects. CHD will utilize capital fund money to install smoke carbon monoxide detector combos in each public housing unit.
	Goal: Partner with and educate landlords to maximize effectiveness of the Section 8 program. Objective: Work with landlords to educate them on successful landlord practices. CHD continues to require new landlords to come in for an in-person landlord briefing. During this briefing, CHD educates landlords on the Section 8 program, including their responsibility to maintain their property in accordance with housing quality standards, family rights and obligations, and enforcing their lease. CHD also educates existing landlords as situations arise that warrant more education.
	<ul> <li>Goal: Work toward making Public Housing properties as energy efficient and environmentally friendly as possible.</li> <li>Objective: Educate tenants on appropriate water savings and energy savings.</li> <li>CHD continues to educate public housing residents on the importance of water conservation in the quarterly newsletter. Tips are provided on how to conserve resources and reduce their monthly bills,</li> <li>Objective: Continue to replace aging HVAC units, windows and doors with more efficient products as funding becomes available.</li> <li>CHD continues to use CDBG and capital funds to install improved energy efficient air conditioning units. CHD continues to install low-E energy efficient windows, and replace weather stripping and sweeps on exterior doors, and replace appliances with energy efficient ones as needed. <sup>1</sup>/<sub>1</sub></li> </ul>
	<b>Goal:</b> Ensure equal opportunity and affirmatively further fair housing. <b>Objective:</b> Continue to use preferences for application/wait list process for elderly and disabled applicants. CHD continues to use preferences for the elderly and disabled on the wait lists. CHD also requires staff to attend various fair housing trainings and other educational opportunities. In addition, CHD utilizes a single person homeless preference. CHD also has a wait list preference for victims of VAWA crimes.
	<b>Objective:</b> Refer Section 8 families to Community Legal Services for issues brought to our attention. CHD continues to work with families to prevent Fair Housing violations by referring assisted families to Community Legal Services as appropriate and necessary.
	<b>Objective:</b> Track those individuals needing translation services to ensure access to programs is not hindered due to language barriers. CHD continues to track walk-ins and telephone calls of all who contact the office to assess translation needs. CHD has contracted with a service that provides translation services for all languages other than English. CHD employs Spanish-speaking staff. In addition, CHD implemented, a mandatory annual refresher training on LEP and the LAP Plan and how to assist those who need translation services. The numbers of those needing Spanish translation services remained steady with a slight decline this year. CHD still falls under the Safe Harbor rule for the translation of vital documents; however, CHD is working on translating the application form in Spanish.
<b>B.4</b> .	Most Recent Fiscal Year Audit.
	(a) Were there any findings in the most recent FY Audit?
	$ \begin{array}{c} Y & N \\ \Box & \boxtimes \end{array} $
	(b) If yes, please describe:
	Other Document and/or Certification Requirements.

C.1	Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan		
	Form 50077-ST-HCV-HP, Certification of Compliance with PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan.		
C.2	Civil Rights Certification.		
	Form 50077-ST-HCV-HP, Certification of Compliance with PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan.		
C.3	Resident Advisory Board (RAB) Comments.		
	(a) Did the RAB(s) provide comments to the PHA Plan?		
	$\begin{array}{cc} Y & N \\ \boxtimes & \Box \end{array}$		
	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. SEE ATTACHMENT B		
C.4	Certification by State or Local Officials.		
	Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.		
D	<b>Statement of Capital Improvements</b> . Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).		
D.1	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD See HUD form 50075.2 approved by HUD on April 13, 2016.		

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

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

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

#### B. Annual Plan.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- **Project-Based Vouchers.** Describe any plans to use HCVs for new project-based vouchers. (24 CFR §983.57(b)(1)) If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.
- **Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).
- **B.3** Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))
- **B.4** Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

#### C. Other Document and/or Certification Requirements

- C.1 Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 SM-HP.
- C.2 Civil Rights Certification. Form HUD-50077 SM-HP, PHA Certifications of Compliance with the PHA Plans and Related Regulation, must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o))
- C.3 Resident Advisory Board (RAB) comments. If the RAB provided comments to the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)
- C.4 Certification by State or Local Officials. Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15)
- D. Statement of Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR 903.7 (g))
  - D.1 Capital Improvements. In order to comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan. PHAs can reference the form by including the following language in Section C. 8.0 of the PHA Plan Template: "See HUD Form 50075.2 approved by HUD on XX/XX/XXXX."

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

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

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



ATTACHMENT A DETAIL OF SECTION B.1



City of Glendale, Arizona Community Housing Division (AZ003)

# Streamlined Annual PHA Plan, form HUD-50075-HP

# Fiscal Year 2017

HUD Streamlined Annual PHA Plan (*High Performer PHAs*), form HUD-50075-HP is new for Fiscal Year beginning 7/2016. This memorandum includes required detail for Section B.1.(b) and Section B.1.(c). All other required data is located in the form HUD 50075-HP.

# **B.1 REVISION OF PHA PLAN ELEMENTS**

# **B.1 (b)** The PHA must submit its Deconcentration Policy for Field Office Review.

The City of Glendale Community Housing Division's Deconcentration Policy is located in the Conventional Public Housing Admissions and Continued Occupancy Policy (ACOP), Section 10.5, Deconcentration Policy, and Section 10.6, Deconcentration Incentives. The City of Glendale's Public Housing program is not subject to deconcentration and income mixing requirements based on 24CFR §903.2.

# 10.5 Deconcentration Policy (24 CFR §903.2)

The Glendale Community Housing Division (CHD) will provide for deconcentration of poverty and encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments.

The PHA'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)].

CHD will affirmatively market all housing opportunities to all eligible income groups. CHD's public housing communities are not categorized by "income level," however lower income residents will not be steered toward lower income developments and higher income residents will not be steered toward higher income developments.

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

- 1. On an annual basis, the PHA must determine the average income of all families residing in all the PHA's covered developments. The PHA may use the median income, instead of average income, provided that the PHA includes a written explanation in its annual plan justifying the use of median income.
- 2. On an annual basis, CHD will 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, CHD will not adjust for unit size.
- 3. The PHA 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).
- 4. The PHA 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.
- 5. Where the income profile for a covered development is not explained or justified in the annual plan submission, the PHA must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing

Depending on local circumstances the PHA'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 the PHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and PHA strategic objectives.

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

For developments outside the EIR the PHA will take the following actions to provide for deconcentration of poverty and income mixing:

The PHA's Deconcentration Policy, as described above, may include skipping of families on the waiting list in order to bring families above the established income range into developments below the established income range, and to bring families below the established income range into developments above the established income range.

CHD will continue to skip families on the waiting list in order to comply with the regulatory requirement of 40% Income Targeting (24CFR §903.2(c)(5)).

### **10.6** Deconcentration Incentives

CHD may offer one or more incentives to encourage applicant families whose income classification would help to meet the deconcentration goals of a particular development.

Various incentives may be used at different times, or under different conditions, but will always be provided in a consistent and nondiscriminatory manner.

# FINANCIAL RESOURCES

Sources	Dollar Amount	Comments
Federal Grants Estimated – FY2017-2018		
- Public Housing Operating Funds	\$558,493	
- Public Housing Capital Fund	\$211,333	See Five Year CFP
- Annual Contrib. for Sec 8 Tenant- Annual Contrib. for Sec 8 Tenant- Based Assist.	0	
a) Housing Assistance Payment	\$8,191,957	
	¢	Administrative Fee & Portability Administrative
b) Administrative Funding	\$688,763	Fee Public Housing
Public Housing Dwelling Rental Income	\$318,181	Improvements & Administrative Costs
		Public Housing Improvements &
Other Income – City of Glendale	\$386,563	Administrative Costs
Other Income	\$30,793	Administrative Costs - other
Portability Income	\$3,462,385	Administering Port-in Vouchers
		Revenue Contingency for Section 8 HAP and Public
Contingency Revenue	\$1,528,047	Housing Subsidy
Total Resources	\$15,376,515	

#### **B.1 (c)** If the PHA answered yes for any element, describe the revisions for each element below:

### DECONCENTRATION AND OTHER POLICIES THAT GOVERN ELIGIBILITY, SELECTION, AND ADMISSIONS

#### 1) Preferences

- Conventional Public Housing Continued Admissions and Occupancy Policy -
  - Section 10.1.E.5Preferences
- Section 8 Administrative Plan -
  - Section 5.2.E.4, Preferences

#### Summary

• Glendale will reopen the application process before assisting non-Glendale residents who have no connection to Glendale. Applicants with no connection to Glendale will be pulled only as a last resort measure, if the waiting list cannot be opened or if opening is delayed beyond a reasonable period of time.

### 2) Work History Definition Clarification

- Conventional Public Housing Continued Admissions and Occupancy Policy -
  - Section 10.1.E.2; 10.1.E.3, Preferences
- Section 8 Administrative Plan
  - Section 5.2.E.2; 5.2.E.3, Preferences

### Summary

• Requirement for a five-year work history will no longer be required.

### 3) At Admission and First Lease Up, Unit Must be in Glendale City Limits (Section 8 Only)

- Section 8 Administrative Plan -
  - Section 6.6.b, Approval to Lease a Unit
  - Section 5.2, Preferences

### Summary

• For first admission to the program, the unit must be located within the City of Glendale, determined by who provides the water service.

### 4) Change to Assistance for College Students (Section 8 only)

- Section 8 Administrative Plan
  - Section 3.2.I, Eligibility, Student Assistance

### Summary

- In accordance with HUD Final Rule published September 21, 2016, the following changes will be incorporated into the Section 8 Administrative Plan for the admission of college students to the Section 8 Housing Choice Voucher program.
- This restriction does not apply to a person with disabilities as such term is defined in section 3(b)(3)(E) of the 1937 Act and who was receiving Section 8 assistance on November 20, 2005.

- A student, under the age of 24 may still be income eligible for assistance in circumstances where the student can demonstrate independence from parents, where the student can demonstrate the absence of parents, or where an examination of the student's parents' income may not be relevant
  - 1. The individual is of legal contract age under state law.
  - The individual has established a household separate from parents or legal guardians for at least one year prior to application for occupancy or the individual meets the U.S. Department of Education's definition of an ''independent student.'' Section 480(d) of the Higher Education Act of 1965, as amended (the HEA), 20 U.S.C. 1087vv(d).
  - 3. The individual is not claimed as a dependent by parents or legal guardians pursuant to IRS regulations.
  - 4. The individual obtains a certification of the amount of financial assistance that will be provided by parents, signed by the individual providing the support, even if no assistance will be provided.
- CHD will verify to determine whether a student is independent for purposes of using the student's income alone for determining Section 8 eligibility (Student's Independence Verification Requirements). Those items include:
  - 1. Reviewing and verifying previous address information to determine evidence of a separate household;
  - 2. Verifying the student meets the U.S. Department of Education's definition of "independent student";
  - 3. Reviewing a student's prior year income tax returns to verify the student is independent or verifying the student meets the U.S. Department of Education's definition of "independent student"; and
  - 4. Verifying income provided by a parent by requiring a written certification from the individual providing the support. Certification is also required if the parent is providing no support to the student. Financial assistance that is provided by persons not living in the unit is part of annual income. (Except if the student meets the Department of Education's definition of "independent student" in paragraphs (2), (3) or (8) set forth below).
    - An "independent student" is defined as:
    - 1. The individual is 24 years of age or older by December 31 of the award year;
    - 2. The individual is an orphan, in foster care, or a ward of the court or was an orphan, in foster care, or a ward of the court at any time when the individual was 13 years of age of older;
    - 3. The individual is, or was immediately prior to attaining the age of majority, an emancipated minor or in legal guardianship as determined by a court of competent jurisdiction in the individual's State of legal residence;
    - 4. The individual is a veteran of the Armed Forces of the United States (as defined in subsection c)(1) of HEA) or is currently serving on active duty in the Armed Forces for other than training purposes;

- 5. The individual is a graduate or professional student;
- 6. The individual is a married individual;
- 7. The individual has legal dependents other than a spouse;
- The individual has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth (as such terms are defined in section 725 of the McKinney-Vento Homeless Assistance Act) (42 U.S.C. 11431 et seq.), or as unaccompanied, at risk of homelessness, and selfsupporting, by
  - a. A local educational agency homeless liaison, designated pursuant to section 722(g)(1)(J)(ii) of the
  - b. McKinney-Vento Homeless Assistance Act;
  - c. The director of a program funded under the Runaway and Homeless Youth Act or a designee of the director;
  - d. The director of a program funded under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (relating to emergency shelter grants) or a designee of the director; or
  - e. A financial aid administrator; or
- The individual is a student for whom a financial aid administrator makes a documented determination of independence by reason of other unusual circumstances.

#### 5) Preference for Homeless Glendale U.S. Military Veterans (Section 8 only)

- Section 8 Administrative Plan
  - Section 5.2.A.5; 5.2.G.9, Preferences

#### Summary

• Single U.S. Military Veterans who are Glendale residents and who are at high risk of being homeless or who are considered by an agency serving homeless persons to be high-risk homeless, will be given a preference for admission to the Section 8 Housing Choice Voucher program. At eligibility, the person must be receiving assistance from the local Phoenix Veterans' Administration for homelessness, or a local agency serving the ongoing needs of homeless persons by providing long term case management. (The credentials of the agency providing the case management will be verified to ensure compliance with the Section 8 family obligations, and that the homeless person's needs are being addressed to prevent a return to homelessness. The HUD definition of homelessness must be met as a secondary qualification for this preference.)

#### **RENT DETERMINATION**

#### 1) Request for Reasonable Accommodation

- Conventional Public Housing Continued Admissions and Occupancy Policy -
  - Section 2.2.B, Questions to Ask in Granting the Accommodation
- Section 8 Administrative Plan -
  - Section 1.4.B, Questions to Ask in Granting the Accommodation

#### Summary

• The family must provide documentation/proof to support the request, if not apparent, any/all information CHD deems necessary in order to make an appropriate determination. Additional questions may arise during the review.

#### 2) Household Income Review at Recertification/Interim Review

- Conventional Public Housing Continued Admissions and Occupancy Policy -
  - Section 12.7.B, Resolving Discrepancies, Other Discrepancies
- Section 8 Administrative Plan -
  - Section 10.8.B. Resolving Discrepancies, Other Discrepancies

#### Summary

• During eligibility or ongoing recertification/interim reviews, CHD will make the determination whether or not the documentation supplied sufficiently and overwhelmingly supports family claims of household income level(s). CHD reserves the right to request additional documentation. Documentation must be verifiable and match, i.e. different addresses, missing bank records, etc.). Questionable documentation will be rejected, unless verifiable verification is provided. CHD does not accept written or verbal statements as proof of income.

#### 3) Live in Aide Status Change to Family Member

- Conventional Public Housing Continued Admissions and Occupancy Policy -
  - Section 10.12, Live In Aide
- Section 8 Administrative Plan
  - Section 6.11, Live In Aide

#### Summary

- With Administrator approval, CHD will review to approve a change from a live in aide to a family member the under the following circumstances only. The intent is to avoid an elderly aide for an elderly person becoming homeless:
  - a. If the head of household is a single person needing a live in aide, and the request is made by the head of household, prior to the death of the head of household;
  - b. If the head of household is a single person needing the live in aide, and the request is made by the head of household, prior to a move to a nursing home by the head of household;
- A change from live in aide to family member will not be approved before termination of assistance or during an investigation for violation of family obligations or lease.

#### 4) Termination at Owner Non-Renewal for Lease Violations (Section 8 Only)

- Section 8 Administrative Plan
  - Section 7.1.C, When A Family May Move
  - Section 16.2.CC, Termination

#### Summary

• If the owner has issued a non renewal for lease violations, a voucher will not be issued and the assistance will be terminated.

# 5) Payment Standard Increase to 120 Percent of FMR as Reasonable Accommodation (Section 8 Only)

- Section 8 Administrative Plan -
  - Section 11.4.1, Setting the Payment Standard

Summary

• CHD may establish a higher payment standard of up to 120% of the FMR without HUD approval if requested as a reasonable accommodation by a family that includes a person with a disability.

#### 6) Inspection Fail Determination for Bed Bugs (Section 8 Only)

- Section 8 Administrative Plan -
  - Section 12.11, Inspection and Bed bugs

Summary

• If a rental unit fails inspection for bed bugs, CHD will review to see how long the family has resided in the unit. If less than 60 days, CHD will issue a landlord fail, as it will be assumed that the infestation was in place prior to move in. If the family has resided in the unit more than 60 days, it will be a tenant fail, dependent upon any governing language in the lease.

#### 7) Approval of Owner for Unit with Reasonable Accommodation (Section 8 Only)

- Section 8 Administrative Plan
  - Section 6.8.O.1, CHD Disapproval of Owner
  - Section 6.9.K.1, Ineligible/Eligible Housing

# Summary

• CHD will not approve a rental unit if the owner is the parent, child, grandparent, grandchild, sister, or brother or any member of the family of an applicant seeking the initial use of a housing choice voucher (currently searching) unless CHD determines that approving the unit would provide reasonable accommodation for a family member who is a person with disabilities, if the family has not first provided proof that no other unit exists in the City of Glendale that provides the required accommodation.

#### 8) Final Payment to Owner (Section 8 Only)

- Section 8 Administrative Plan
  - Section 18.2.D., Termination of Contract, Final Payment to Owner

#### Summary

- If the HAP contract terminates and the tenant requests a hearing, the HAP will be prorated for the month in which the 30-day notice of termination expires.
- If the tenant is terminated for an emergency HQS violation, CHD will pay the landlord for the month in which the family's assistance is terminated.

#### 9) Restraint of Animals During Inspection (Section 8 Only)

- Section 8 Administrative Plan
  - Section 12.0.H., Inspection Policies, Housing Quality Standards, and Damages

#### Summary

• Animals must be restrained at all times during the inspection to avoid contact with the inspector. Failure to comply will result in a failed inspection

#### 10) Family Responsibility for Living Conditions (Section 8 Only)

- Section 8 Administrative Plan
  - Section 12.2.C.8., Family Responsibility for HQS

Summary

• CHD will not continue to assist families who show a pattern of failed HQS inspections for property damage and/or who live in unsanitary conditions. Those who demonstrate a pattern of failed inspections for such deficiencies will be reviewed for termination, regardless of whether the deficiencies are corrected by the re-inspection date.

#### 11) Landlord Responsibility to Repair Inoperable Appliances or Plumbing (Section 8 Only)

- Section 8 Administrative Plan
  - Section 12.2.C.8., Inspection Policies, Housing Quality Standards, and Damages

#### Summary

• Repair of refrigerators, range and oven, or a major plumbing fixture supplied by the owner that are inoperable must be completed within 72 hours.

# 12) Public Housing Inspections Include Any/All Items That Will Be Inspected During a HUD Inspection

- Conventional Public Housing Continued Admissions and Occupancy Policy -
  - Section 17.0, Inspections

Summary

• Adds items such as security lighting, erosion, graffiti, dryer vents, PVC downspouts and exterior piping, water heater venting, unit interiors, utilities, pest control. This list is not all-inclusive.

## SAFETY AND CRIME PREVENTION (VAWA)

#### 1) Updates to the Violence Against Women Act Addendum – Emergency Transfer Plan

- Violence Against Women Act Addendum to FY 2017 PHA Plan
  - To add an Emergency Transfer Plan to the 2017 Addendum

#### 2) Updates to the Violence Against Women Act – Definitions

- Conventional Public Housing Continued Admissions and Occupancy Policy -
  - 16.8, VAWA Victim, Transfer Request
  - 25.0, Glossary
- Section 8 Administrative Plan
  - Section 16.5, Domestic Violence, Dating Violence, Sexual Assault, or Stalking
  - Section 30, Glossary

#### Summary

- Updated definitions for Affiliated Individual and Intimate Partner
- Public Housing tenants who are victims of VAWA crimes will be given priority for unit transfers.
- Section 8 families continue to have portability as an option, however they will remain liable for any financial obligations under the lease.

#### 3) Updates to the Violence Against Women Act

- Conventional Public Housing Continued Admissions and Occupancy Policy -
  - 10.1, Preferences
  - 21.3, Domestic Violence, Dating Violence, Sexual Assault, or Stalking (Violence Against Women Act (VAWA))
- Section 8 Administrative Plan
  - Section 5.2, Preferences
  - Section 16.5, Domestic Violence, Dating Violence, Sexual Assault, or Stalking (Violence Against Women Act (VAWA))

#### Summary

- Updated to comply with the Violence Against Women Reauthorization Act of 2013 (Final Rule implementation published November 16, 2016).
- Removes reference to affiliated individual as an applicant.
- Added that assistance will be terminated if the perpetrator is allowed to move back into the household after removal by CHD (lease violation).

#### **DECLARATION OF TRUST (DOT)**

The DOT is not a required part of the Plan template, however until HUD specifies the DOT submittal process, CHD shall continue to include it in this memorandum. In order to continue to receive funding for the Capital Fund Program (CFP), CHD certifies compliance with federal DOT requirements to execute and record a current DOT.

#### Summary

All Public Housing acquired, developed, maintained, or assisted with funds under the U.S. Housing Act of 1937 must have a HUD Declaration of Trust recorded against the property with the local Recorder's Office. The Declaration of Trust is a legal instrument that grants HUD an interest in Public Housing properties for 20 years. It automatically extends HUD's financial interest in the properties by one year, every year that the City accepts federal capital funds. It also provides public notice that the property must be operated in accordance with federal Public Housing rules and requirements, including the requirement not to convey or otherwise encumber the property unless expressly authorized by federal law and/or HUD. The filing of the Declaration of Trust will ensure that the City is in compliance with the Conventional Public Housing program federal regulations, and enables the City to remain eligible to receive federal funds for capital improvements, making it possible to maintain the City-owned Public Housing rental communities.



City of Glendale Community Housing Division 6842 N 61<sup>st</sup> Ave Glendale AZ 85301 623-930-2180



# ATTACHMENT B

# **Resident Advisory Comments and Public Hearing**

# Public Hearing held February 16, 2017

# <u>Resident and Participant comments (both programs) received by Glendale Housing, either prior to or during the public hearing:</u>

- "I like how my caseworker calls me back right away, and how she always knows the answers to my questions!"
- "Calling back promptly helps so much. I don't stress. I am very pleased with the Glendale HUD housing's customer service!! Please keep it going!"
- "I think they should put a carport for the cars 'cause (*sic*) its hot."

Comments received have been reviewed. Three comments were received. Two addressed the high level of customer service given by the Community Housing team, and one requested covered parking. Covered parking at public housing is not currently on the list of capital improvements.

### **Challenged Elements**

No challenged elements