

Housing Authority Of Pompano Beach



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PHA ANNUAL PLAN 2021

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Streamlined Annual PHA Plan <i>(High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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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. 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 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 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	<p>PHA Name: <u>HOUSING AUTHORITY OF POMPANO BEACH</u> PHA Code: <u>FL028</u> PHA Type: <input type="checkbox"/> Small <input checked="" type="checkbox"/> High Performer PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/2021</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>5</u> Number of Housing Choice Vouchers (HCVs) <u>1096</u> Total Combined <u>1101</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</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 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's 2021 Annual Plan and attachments are available on its website at: http://www.hapb.org/about_us/annual_plan/index.php.**

PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA since its last **Annual PHA Plan** submission?

Y N

- X Statement of Housing Needs and Strategy for Addressing Housing Needs.
- X Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- X Financial Resources.
- X Rent Determination.
- X Homeownership Programs.
- X Safety and Crime Prevention.
- X Pet Policy.
- X Substantial Deviation.
- X Significant Amendment/Modification

(b) The PHA must submit its Deconcentration Policy for Field Office Review.

(c) If the PHA answered yes for any element, describe the revisions for each element below:

The HAPB has adopted the following regulatory waivers in PIH Notice 2020-05 and PIH Notice 2020-13:

1. PH and HCV-2: Family Income and Composition: Delayed Annual Examination;
2. PH and HCV-3: Family Income and Composition: Annual Examination-Income Verification requirements; and
3. PH and HCV-4: Family Income and Composition: Interim Examinations

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

X Hope VI or Choice Neighborhoods.

X Mixed Finance Modernization or Development.

X Demolition and/or Disposition.

X Conversion of Public Housing to Tenant Based Assistance.

X Conversion of Public Housing to Project-Based Assistance under RAD.

X Project Based Vouchers.

X Units with Approved Vacancies for Modernization.

X 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.

The HAPB is taking the opportunity provided by Section 22 of the Housing Act to maintain development affordability for the long term, through the conversion of Public Housing subsidy to Project Based Vouchers for the remaining Public Housing Units at Ben Turner.

The HAPB will undertake the Voluntary Conversion process of converting its five (5) Public Housing units to the HCV Section 8 funding platform. The Public Housing units are a part of the HAPB's Ben Turner Ridge Apartment development, which was recently constructed in 2017, with a DOFA date of April 30, 2018. This Voluntary Conversion is consistent with the HAPB's mission of assuring fiscal integrity through the increase in revenue resulting from the fair market rents. The Voluntary Conversion is also consistent the HAPB's mission because it ensures funding is in place for long term viability of the building through preventative maintenance, thereby promoting decent, safe, sanitary, suitable living for its residents at an affordable rent. Moreover, Voluntary Conversion is consistent with the HAPB's goals to increase housing assisted housing choices and expand the supply of assisted housing. Finally, Voluntary Conversion is also consistent with HUD's intent to dramatically reduce its Public Housing stock.

B.3 Progress Report.

The Housing Authority of the City of Pompano Beach is meeting the goals and objectives of the 5 Year Plan.

The aim of the Housing Authority is to ensure safe, decent and affordable housing; create opportunities for residents' self-sufficiency and economic independence; and assure fiscal integrity in all programs.

In 2017, the Housing Authority completed the construction of its Ben Turner Ridge apartments, which consists of (6) three-bedrooms and (4) four-bedrooms, which is a total of (10) units. It is a mixed finance property consisting of (5) units of Public Housing and (5) units of Affordable Housing. The Certificate of Occupancy was received in April of 2018 and the Housing Authority began leasing soon thereafter. Currently, the units are 100% occupied. Furthermore, the Housing Authority continues to be a high performer for its Section 8 SEMAP score.

The Housing Authority partnered with PHAs and other community partners to participate in the HEART Program. The HEART program represents an innovative system of care that provides integrated subsidized housing and a supportive services network that advances family stability for 50 at risk families. The Housing Authority also administered the Tenant Based Rental Assistance Program, funded by Florida Housing Corporation, which provided temporary housing assistance to families who are homeless.

Additionally, in an effort to further its mission of providing affordable housing, in 2018 the Housing Authority, through its affiliate entity, began purchasing residential homes within its jurisdiction, rehabilitating/renovating the homes as needed, and renting them to families at an affordable rent. To date, five (5) single family homes have been purchased. Moreover, the Housing Authority will continue to explore Notices of Funding Opportunities in an effort to obtain vouchers to assist individuals/families.

The Housing Authority is in the process of developing its vacant land which was formerly Blanche Ely Estates Public Housing units. The goal is to build affordable housing for seniors. The Housing Authority will apply for tax credits, SAIL, and other opportunities to fund this development.

The Housing Authority recognizes the resident as its ultimate customer. The Authority is continually trying to improve our management and service delivery efforts through oversight, assistance and selective intervention by highly skilled, diagnostic and result- oriented personnel. The Authority has created a problem solving partnership with our residents, the community, and government leadership.

<p>B.4.</p>	<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: <u>N/A</u></p>
<p>Other Document and/or Certification Requirements.</p>	
<p>C.1</p>	<p>Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan</p> <p><i>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.</i></p>
<p>C.2</p>	<p>Civil Rights Certification.</p> <p><i>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.</i></p>
<p>C.3</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>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> <p>.</p>
<p>C.4</p>	<p>Certification by State or Local Officials.</p> <p><i>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.</i></p>
<p>D</p>	<p>Statement of Capital Improvements. Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>

D.1	<p>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.</p> <p><i>See HUD Form 50075.2 approved by HUD on 03/17/2020</i></p>
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Instructions for Preparation of Form HUD-50075-HP
Annual Plan for High Performing PHAs

A. PHA Information. HAs 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 public housing and Section 8 tenant-based assistance waiting lists. [24 CFR §903.7\(a\)\(1\)](#) and 24 CFR §903.12(b). Provide a description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. 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 public housing and Section 8 tenant-based assistance 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. ([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\(d\)](#))

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: [Notice PIH 1999-51](#). (24 CFR §903.7(r)(2)(ii))

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 2) 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: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (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.

Proposed
Changes/
Updates to
Section 8 HCV
Administrative
Plan 2020

ADMINISTRATIVE PLAN CHANGES 2020

PART III: DENIAL OF ASSISTANCE

3-III.A. OVERVIEW p.3-18

A family that does not meet the eligibility criteria discussed in Parts I and II, must be denied assistance. In this section we will discuss other situations and circumstances in which denial of assistance is mandatory for the PHA, and those in which denial of assistance is optional for the PHA.

When considering any denial of admission, PHAs may not use arrest records as the basis for the denial. Further, HUD does not require the adoption of “One Strike” policies and reminds PHAs of their obligation to safeguard the due process rights of applicants and tenants [Notice PIH 2015-19].

HUD’s Office of General Counsel issued a memo on April 4, 2016, regarding the application of Fair Housing Act standards to the use of criminal records. This memo states that a PHA violates the Fair Housing Act when their policy or practice has an unjustified discriminatory effect, even when the PHA had no intention to discriminate. Where a policy or practice that restricts admission based on criminal history has a disparate impact on a particular race, national origin, or other protected class, that policy or practice is in violation of the Fair Housing Act if it is not necessary to serve a substantial, legitimate, nondiscriminatory interest of the PHA, or if that interest could be served by another practice that has a less discriminatory effect [OGC Memo 4/4/16].

3-III.B. MANDATORY DENIAL OF ASSISTANCE [24 CFR 982.553(a)] p. 3-20

PHA Policy

In determining reasonable cause, the PHA will consider all credible evidence, including but not limited to, any record of convictions, arrests, or evictions of household members related to the use of illegal drugs or the abuse of alcohol. A conviction will be given more weight than an arrest. A record or records of arrest will not be used as the sole basis of determining reasonable cause. The PHA will also consider evidence from treatment providers or community-based organizations providing services to household members.

4-II.F. UPDATING THE WAITING LIST [24 CFR 982.204]

PHA Policy

The waiting list will be updated annually as needed to ensure that all applicants and applicant information is current and timely.

**6-I.E. EARNED INCOME DISALLOWANCE FOR PERSONS WITH DISABILITIES
[24 CFR 5.617; Streamlining Final Rule (SFR) Federal Register 3/8/16] p. 6-10**

Calculation Method

Initial 12-Month Exclusion

During the initial exclusion period of 12 consecutive months, the full amount (100 percent) of any increase in income attributable to new employment or increased earnings is excluded.

PHA Policy

The initial EID exclusion period will begin on the first of the month following the date an eligible member of a qualified family is first employed or first experiences an increase in earnings.

Second 12-Month Exclusion

During the second exclusion period of 12 consecutive months, the PHA must exclude at least 50 percent of any increase in income attributable to employment or increased earnings.

PHA Policy

During the second 12-month exclusion period, the PHA will exclude 100 percent of any increase in income attributable to new employment or increased earnings.

Lifetime Limitation

The EID has a two-year (24-month) lifetime maximum. The two-year eligibility period begins at the same time that the initial exclusion period begins and ends 24 months later. During the 24-month period, an individual remains eligible for EID even if they begin to receive assistance from a different housing agency, move between public housing and Section 8 assistance, or have breaks in assistance.

Necessary and Reasonable Costs p.6-35

PHA Policy

Child care expenses will be considered for the time required for the eligible activity plus reasonable transportation time. For child care that enables a family member to go to school, the time allowed may include not more than one study hour for each hour spent in class.

To establish the reasonableness of child care costs, the PHA will use the schedule of child care costs from a qualified local entity that either subsidizes child care costs or licenses child care providers~~the local welfare agency~~. Families may present, and the PHA will consider, justification for costs that exceed typical costs in the area.

Upfront Income Verification Using Non-HUD Systems (Optional) p. 7-4

In addition to mandatory use of the EIV system, HUD encourages PHAs to utilize other upfront verification sources.

PHA Policy

~~The PHA will inform all applicants and participants of its use of the following UIV resources during the admission and reexamination process: HUD's EIV system~~

The PHA will use other non-HUD UIV systems during the admission and reexamination process, as may be required by certain employers, to verify income. The non-HUD UIV resources include, but are not limited to:

- The Work Number/Equifax
- Verifyfast
- CC Verify
- IRS Form 4506-T
- Employer's Unity

In general, the PHA will utilize the non-HUD UIV resource when it is an applicable as a verification source during the admission and reexamination process.

Written Third-Party Verification PIH [2018-18](#)] p.7-6

PHA Policy

As verification of earned income, the PHA will require the family to provide the three (3) most current, consecutive pay stubs. At the PHA's discretion, if additional paystubs are needed due to the family's circumstances (e.g., sporadic income, fluctuating schedule, etc.), the PHA may request additional paystubs or a payroll record.

8-II.C. ANNUAL/BIENNIAL HQS INSPECTIONS [24 CFR 982.405; and 982.406, Notice PIH 2016-05] p. 8-12

PHA Policy

Each unit under HAP contract must be inspected within ~~12~~ 24 months of the last full HQS inspection.

The PHA ~~will not~~ may rely on alternative inspection standards.

8-II.E. QUALITY CONTROL INSPECTIONS [24 CFR 982.405(b); HCV GB, p. 10-32] p. 8-13

PHA Policy

In addition to HUD required Quality Control, the PHA will also conduct random inspections on units that have failed the prior year.

Zero HAP Families Who Wish to Move [24 CFR 982.455] p-10-5

A participant who is not receiving any subsidy, but whose HAP contract is still in force, may request a voucher to move to a different unit. The PHA must issue a voucher to move unless it has grounds to deny assistance under the program regulations. However, if the PHA determines no subsidy would be paid at the new unit, the PHA may refuse to enter into a HAP contract on behalf of the family.

PHA Policy

If a zero HAP family requests to move to a new unit, the family may request a voucher to move. However, if no subsidy will be paid at the unit to which the family requests to move, the PHA will not enter into a HAP contract on behalf of the family for the new unit.

11-I.B STREAMLINED ANNUAL REEXAMINATIONS [24 CFR 982.516(b)] p.11-1

Two streamlining options are available, depending upon the percentage of the family's income that is received from fixed sources. If at least 90 percent of the family's income is from fixed sources, the PHA may streamline the verification of fixed income ~~and may choose whether~~ but is not required to -verify non-fixed income amounts ~~in years where no fixed income review is required~~. If the family receives less than 90 percent of its income from fixed sources, the PHA may streamline the verification of fixed income and must verify non-fixed income annually.

PHA Policy

Third-party verification of non-fixed income will be obtained annually regardless of the percentage of family income received from fixed sources.

13-II.G. FORECLOSURE [Notice PIH 2010-49] ; Helping Families Save Their Homes Act of 2009 Sections 701-704 and 12 USC 5201-Protecting Tenants at Foreclosure Act of 2009. p. 13-14

Families receiving HCV assistance are entitled to certain protections set forth under the Protecting Tenants at Foreclosure Act (PTFA). During the term of the lease, the new owner of the property does not have good cause to terminate the tenant's lease, unless the new owner will occupy the unit as their primary residence and has provided the tenant with at least a 90-day notice. In that case, the lease may be terminated effective on the date of sale, although the tenant is still entitled to a 90-day notice to vacate. Further, the new owner assumes interest in the lease between the prior owner and the tenant and to the HAP contract.

Any state or local law that provides longer time periods or other additional protections for tenants also applies.

PHA Policy

If a property is in foreclosure, the PHA will make all reasonable efforts to determine the

status of the foreclosure and ownership of the property and will continue to make payments to the original owner until ownership legally transfers in accordance with the HAP contract.

The PHA will attempt to obtain a written acknowledgement of the assignment of the HAP contract from the successor in interest. This will include a request for owner information, including a tax identification number and payment instructions from the new owner. Even if the new owner does not acknowledge the assignment of the HAP contract in writing, the assignment is still effective by operation of law.

The PHA will inform the tenant that they must continue to pay rent in accordance with the lease, and if the new owner refuses to accept payment or cannot be identified, the tenant should pay rent into escrow. Failure to pay rent may constitute an independent ground for eviction.

In the event that the PHA is unable to make HAP payments to the new owner due to an action or inaction by the new owner that prevents such payments (e.g., rejection of payments or failure to maintain the property according to HQS), or due to an inability to identify the new owner, the PHA will either use the funds to pay:

The utilities that are the owner's responsibility after taking reasonable steps to notify the owner; except that if the unit has been or will be rendered uninhabitable due to termination or threat of termination of service, prior notice is not required. In the latter case, the PHA shall notify the owner within a reasonable time after making the utility payment; or

For the family's reasonable moving costs, including security deposit costs.

The PHA will also refer the tenant, as needed, to the local legal aid office in order to ensure adequate protection of the tenant's rights and enforcement of the successor in interest's performance under the HAP contract.

See Section 12-III.B for a discussion of foreclosure as it pertains to owner termination of tenancy.

Prohibited Owner Actions p. 14-7

PHA Policy

Committing sexual or other harassment, either quid pro quo or hostile environment, based on the protected classes defined in Chapter 2

Retaliating against any applicant or participant reporting/alleging sexual or other harassment, either quid pro quo or hostile environment, based on the protected classes defined in Chapter 2

Informal Review Procedures [24 CFR 982.554(b)] p. 15-8

The informal review must be conducted by a person other than the one who made or approved the decision under review, or a subordinate of this person.

The applicant must be provided an opportunity to present written or oral objections to the decision of the PHA.

Remote Informal Reviews

All PHA policies and processes for remote informal reviews must be conducted in accordance with due process requirements and be in compliance with HUD regulations.

PHA Policy

The PHA has the sole discretion to require that informal reviews be conducted remotely in case of local, state, or national physical distancing orders, and in cases of inclement weather or natural disaster.

In addition, the PHA will conduct an informal review remotely upon request of the applicant as a reasonable accommodation for a person with a disability, if an applicant does not have child care or transportation that would enable them to attend the informal review, or if the applicant believes an in-person informal review would create an undue health risk. The PHA will consider other reasonable requests for a remote informal review on a case-by-case basis.

Conducting Remote Informal Reviews

The PHA must ensure that the applicant has the right to hear and be heard.

PHA Policy

The PHA will conduct remote informal reviews via telephone conferencing call-in or via videoconferencing. If the informal review will be conducted via videoconferencing, the PHA will ensure that all applicants, applicant representatives, PHA representatives and the person conducting the informal review can adequately access the platform (i.e., hear, be heard, see, and be seen). If any applicant, applicant representative, PHA representative, or person conducting the informal review is unable to effectively utilize the videoconferencing platform, the informal review will be conducted by telephone conferencing call-in.

Whether the informal review is to be conducted via videoconferencing or telephone call-in, the PHA will provide all parties login information and/or conferencing call-in information before the review.

Remote Informal Hearings p. 15-10

The PHA's essential responsibility is to ensure informal hearings meet the requirements of due process and comply with HUD regulations. Therefore, all PHA policies and processes for remote informal hearings will be conducted in accordance with due process requirements and will be in compliance with HUD regulations.

PHA Policy

The PHA has the sole discretion to require that informal hearings be conducted remotely in case of local, state, or national physical distancing orders, and in cases of inclement weather or natural disaster.

In addition, the PHA will conduct an informal hearing remotely upon request as a reasonable accommodation for a person with a disability, if a participant does not have child care or transportation that would enable them to attend the informal hearing, or if the participant believes an in-person hearing would create an undue health risk. The PHA will consider other reasonable requests for a remote informal hearing on a case-by-case basis.

Conducting Informal Hearings Remotely

In conducting any informal hearing remotely, the PHA shall ensure due process and that all parties are able to have full access to the hearing.

PHA Policy

The PHA will conduct remote informal hearings via telephone conferencing call-in or via videoconferencing. If the informal hearing will be conducted via videoconferencing, the PHA will ensure that all participants, participant representatives, advocates, witnesses, PHA representatives, and the hearing officer can adequately access the platform (i.e., hear, be heard, see, and be seen).

If any participant, representative, advocate, witness, PHA representative, or hearing officer is unable to effectively utilize the videoconferencing platform, the informal hearing will be conducted by telephone conferencing call-in.

Whether the informal hearing is to be conducted via videoconferencing or telephone call-in, the PHA will provide all parties login information and/or telephone call-in information before the hearing.

Informal Hearing Procedures p. 15-12

***Notice to the Family* [24 CFR 982.555(c)]**

PHA Policy

In cases where the PHA makes a decision for which an informal hearing must be offered, the notice to the family will include all of the following:

That the family may request a remote informal hearing

If the PHA will require that the hearing be conducted remotely, at the time the notice is sent to the family informing them of the right to request an informal hearing, the family

will be notified that the informal hearing will be conducted remotely. The family will be informed of the processes involved in a remote informal hearing and that the PHA will provide technical assistance, if needed, before the informal hearing.

Pre-Hearing Right to Discovery [24 CFR 982.555(e)] p. 15-13

PHA Policy

The family will be allowed to copy any documents related to the hearing at a cost of \$.15 per page. The family must request discovery of PHA documents no later than 12:00 p.m. on the business day prior to the scheduled hearing date.

If the hearing will be conducted remotely, the PHA will compile a hearing packet, consisting of all documents the PHA intends to produce at the informal hearing. The PHA will mail copies of the hearing packet to the family, the family's representatives, if any, and the hearing officer at least two days before the scheduled remote informal hearing. The original hearing packet will be in the possession of the PHA representative and retained by the PHA.

Documents will be shared electronically whenever possible.

PHA Policy p. 15-14

The PHA must be given an opportunity to examine at the PHA offices before the hearing any family documents that are directly relevant to the hearing. Whenever a participant requests an informal hearing, the PHA will automatically mail a letter to the participant requesting a copy of all documents that the participant intends to present or utilize at the hearing. The participant must make the documents available no later than 12:00 pm on the business day prior to the scheduled hearing date.

If the informal hearing is to be conducted remotely, the PHA will require the family to provide any documents directly relevant to the informal hearing at least 24 hours before the scheduled hearing.

Documents will be shared electronically whenever possible.

15- VII.B. REPORTING REQUIREMENT [24 CFR 35.1225(e); Notice PIH 2017-13] p. 15-31

The PHA-owner must report the name and address of a child identified as having an elevated blood lead level to the public health department within five business days of being so notified by any other medical health care professional. The owner must also notify the HUD field office and the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) of the child's address within five business days. The PHA may collaborate with the owner on the notification process, such as by agreeing with the owner to provide the required notifications on the owner's behalf.

PHA Policy

The PHA will rely on the owner to provide that applicable notifications.

Alternatively, upon notification by the owner, tThe PHA may provide the public health department written notice of the name and address of any child identified as having an elevated blood lead level

All of Chapter 17

Attachment

Section C.3

Resident

Advisory Board

Comments

RESIDENT ADVISORY BOARD

MEETING: AUGUST 22, 2020 @ 3:00 P.M.

LOCATION: VIRTUAL GOTOMEETING

ROLL CALL	-President -	Ms. Willie Ruth Heath
	Secretary -	Ms. Delois Clark
	Member	Ms. Michelle Orr
	Member	Ms. Nikosha Worthy

Subject: 2021 Annual Plan

In light of the COVID-19 pandemic, the Resident Advisory Board (RAB) convened at 3:00p.m. using the virtual conference medium.

The purpose of the meeting was to go over the 2021 Annual Plan and to discuss the Housing Authority's Streamline Voluntary Conversion plan. Also, in attendance was Ms. Patrice Watkins-Edwards.

The RAB is pleased that the Housing Authority is once again a high performer.

Revision of PHA Plan Elements: It was discussed that the Section 8 Administrative Plan and the Public Housing Admissions and Continued Occupancy Plan were updated with respect to Rent Determinations. PIH Notice 2020-05- and PIH 2020-13 regulatory waivers were also discussed and the RAB was advised that the plans were updated accordingly.

New Activities: It was discussed that the Housing Authority is exploring undertaking the Voluntary Conversion for 2021 of converting its five (5) Public Housing units to the Section 8 funding platform. This process is known as the Steamline Voluntary Conversion process. HUD wants to ensure that the PHA is working with its residents to complete the voluntary conversion plan. It was also explained that the Housing Authority will undertake efforts to consult with the Public Housing residents to obtain their feedback. The RAB's assistance will be needed to assist with outreach efforts. It was further discussed that HUD requires the Public Housing residents' permission for the conversion, as well as, the City of Pompano Beach and the Housing Authority Board of Commissioners' approval. Ms. Heath expressed her approval of the conversion and stated that it is a good idea for the conversion to happen. With respect to disseminating the information to the Public Housing tenants, it was discussed that emails, flyers

and also gotomeeting can be used to communicate the information. Ms. Orr suggested mailing letters followed by an email to ensure each person is informed in two (2) different ways. The Community Room at Golden Square/Villas may possibly accommodate a physical meeting since the anticipated number of attendees will be small and will make social distancing feasible. Ms. Heath expressed why she preferred a physical meeting with the Public Housing residents. It was agreed that a physical meeting will be planned at the Golden Square/Villas location. The date is to be determined. After discussions, the RAB expressed its support for the voluntary conversion. The RAB was also informed that if the conversion is completed, and the Public Housing Residents receive vouchers, they can remain in their units at Ben Turner using the vouchers.

Progress Report: The RAB is pleased about the five (5) single family homes that the Housing Authority is purchasing in the community in an effort to further its mission of providing affordable housing in its jurisdiction.

The HEART program tenants are still being assisted.

The Resident Advisory Board was apprised of the status of Blanche Ely Estate. The platting process is completed with Broward County. The plan is to build senior housing with a villa style/duplex structure type. The buildings will have the appearance of a single family home. We are now in the process of getting funding to build and the Housing Authority will be applying for tax credits this year. The RAB expressed that they are pleased with the concept.

Most Recent Fiscal Year Audit: It was discussed that the Housing Authority did not have any findings.

The Resident Advisory Board will get together to decide a date for the next meeting.

Meeting was adjourned.

Willie R. Heath

Ms. Willie Ruth Heath

Motto: "Reach Out, Inspire and Encourage to be the best you can be."

Housing Authority Of Pompano Beach



Post Office Box 2006
321 West Atlantic Boulevard
Pompano Beach, FL 33060
(954) 785-7200 FAX: (954) 942-8142

PHA'S ANALYSIS OF RAB COMMENTS

The Housing Authority of Pompano Beach has reviewed the Resident Advisory Board (RAB) Comments and concurs with the recommendations. All recommendations of the RAB will be incorporated.

**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 2/29/2016

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

I, Gregory P. Harrison, the City Manager
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

Pompano Beach Public Housing Authority

PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of

Impediments (AI) to Fair Housing Choice of the

City of Pompano Beach


Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State Consolidated Plan and the AI.

The Housing Authority partnered with PHAs and other community partners to participate in the HEART Program. The HEART program represents an innovative system of care that provides integrated subsidized housing and a supportive services network that advances family stability. Number of Public Housing Units-5; Number of Housing Choice Vouchers-1096 the total combined-1,101. The Housing Authority also administered the Tenant Based Rental assistance program, funded by Florida Housing Corporation, which provides temporary housing assistance to families who are homeless which is consistent with the COPB Consolidated Plan and AI Plan.

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 Gregory P. Harrison	Title City Manager
Signature 	Date 11/24/2020

HOUSING AUTHORITY OF POMPANO BEACH
Section 8 Housing Choice Voucher Program
~VAWA Attachment to Annual Plan~

Housing Authority of Pompano Beach Section 8 Housing Choice Voucher Program, in accordance with the Violence Against Women Act (VAWA) of 2013 and the HUD regulation at 24 CFR 5.2005(b), is committed to providing tenant-based rental assistance to eligible displaced victims of domestic violence, dating violence, sexual assault or stalking, residing in the jurisdiction of Broward County, Florida. The PHA further acknowledges that a victim of domestic violence may have an unfavorable history that would warrant denial under the PHA's general policies (i.e., income, assets, history of public housing eviction). In the event a determination to deny admission to an applicant is made, the PHA will include in its Notice of Denial, a certification form of Domestic Violence, Violence, Dating Violence, Sexual Assault or Stalking –HUD-5380. The applicant is offered the opportunity to provide documentation affirming that the cause of the unfavorable history is that a member of the applicant family is or has been a victim of domestic violence. The PHA also prohibits the eviction or the removal of assistance from persons living in Section 8 rental assisted housing if the asserted grounds for such action(s) or act(s) are of domestic violence, dating violence, sexual assault, or stalking as those terms are defined in the VAWA Act of 2013.

Women In Distress of Broward County, Inc is the only nationally accredited, state-certified, full service domestic violence center serving Broward County. Their mission is to provide victims of domestic violence with safe shelter, crisis intervention and resources, and to educate the community in order to Stop Abuse For Everyone (SAFE) through Intervention, Education and Advocacy. They strive to accomplish this mission by offering a 24 hour crisis hotline, emergency shelter, counseling, education and professional trainings on domestic violence and related topics.

Women in Distress of Broward County, Inc., has taken the lead in the Broward County area to reduce and prevent homelessness of displaced individuals/families that fall victim to domestic violence. The Housing Authority of Pompano Beach will work with Women in Distress to enhance victim safety of all citizens as well as those families currently assisted by the PHA.

In working with Women in Distress, it is our objective to provide a housing resource for victims of domestic violence that due to circumstance are situationally homeless, have no viable access to other housing resources to protect the safety of the individuals/families and ultimately avoid the risk of disbandment of the family's unit.

The portability feature of the Housing Choice Voucher Program is also utilized as deemed necessary upon request, if local resources are assessed as insufficient to protect the safety of the victim and the family. The PHA may also make referrals to the Women in Distress, upon identifying individuals/families that are active with the PHA and are at risk or in need of supportive services to protect against domestic violence.

All new participants are informed of the Violence Against Women's Act (VAWA) of 2013 at the Section 8 Program's "*Orientation*" session as well as annually in the re-certification packet for current participants. The PHA's outreach initiative also continues through notification by letter correspondence to current landlords, as well as, attached to all Requests for Tenancy Approval Forms.