

2022 ANNUAL PLAN

PUBLIC COMMENT MEETING



HOUSTON
HOUSING AUTHORITY

Transforming Lives & Communities



AGENDA

1. Introductions
2. Planned Activities for FY 2022
3. Revisions to the Admissions and Continued Occupancy (ACOP)
4. Revisions to the Section 8 Administrative Plan
5. Resources
6. Questions & Comments

Public Comment Period & Hearing

- HHA is providing a public comment period for the Fiscal Year 2022 Annual Plan which includes revisions to the Section 8 Administrative Plan, Public Housing Admissions and Continued Occupancy Policy and other updates.
- All documents are available for viewing and download on HHA's website.
- The comment period extends from August 20 to October 4, 2021.
- The HHA Board of Commissioners will conduct a public hearing on October 19, 2021, following which they will vote on the Annual PHA Plan.
- Written comments must be received by October 4, 2021. Send comments to Alan Isa, 2640 Fountain View Drive, Suite 3034, Houston, Texas 77057, or e-mail to aisa@housingforhouston.com.

Annual PHA Plan Background

- HUD regulations require that HHA prepare a Five-Year PHA Plan that describes agency goals, objectives, policies and planned initiatives. HHA submitted its most recent Five-Year PHA Plan in January 2020.
- HUD also requires that HHA prepare an Annual Plan update that describes any changes to the Five-Year PHA Plan, including revisions to policies, a description of any planned development or demolition and other important information.
- HHA's FY 2022 Annual Plan includes information for the period January 1 to December 31, 2022.

FY 2022 Annual Plan: Planned Activities

Moving To Work

- HHA was designated as a Moving to Work (MTW) agency in 2021. An extensive public comment and input process was conducted before HHA applied for MTW.
- MTW designation provides HHA with programmatic and financial flexibility including the ability to waive some HUD regulations.
- As part of its MTW participation, HHA will participate in a national evaluation of alternative rent policies that will apply to some Public Housing residents and HCV participants. All elderly and disabled households will be exempt from the new rent policy.
- HHA plans to begin enrollment for the new rent policy in mid-2022.
- Later in 2021, HHA plans to seek further public comment on its MTW plans including the alternative rent policy. This process is referred to as the “MTW Supplement” to the Annual Plan.

Rental Assistance Demonstration (RAD) Conversions

- HHA will continue to expand initiatives to ensure the long-term preservation of public housing developments through conversion to project-based assistance under HUD's Rental Assistance Demonstration (RAD) program.
- Through RAD conversion, HHA has the opportunity to access additional private and/or other capital resources if needed to revitalize, redevelop and/or address capital needs.
- RAD provides extensive resident protections including ensuring that existing residents have the right to return to the converted project.
- To date, HHA has completed the conversion under RAD of HRI/Victory.
- RAD conversions currently planned for FY 2022 or beyond include:
 - Heatherbrook Apartments
 - Sweetwater Point Apartments
 - Allen Parkway Village
 - Historic Oaks at Parkway Village

Before RAD & After RAD

BEFORE RAD

Properties are typically not funded at 100% in Public Housing

In Public Housing, PHAs cannot borrow money to perform necessary repairs

The funding fails to keep up with the deteriorating living conditions of residents

Residents cannot choose to move without losing housing assistance

AFTER RAD

Properties are placed on a more stable Section 8 funding platform

PHAs and owners can more easily borrow money and perform rehabilitation work

The living conditions of residents are improved

Residents may receive a tenant-based voucher, or similar assistance, and move after 1 year in PBV and 2 years in PBRA

Other Planned Development Activity

HHA will also continue to partner to expand affordable housing under the Public Facilities Corporation provisions of Texas law. Other development projects in the planning or development phases undertaken by HHA and/or its development partners include:

- Planned Phase II of Independence Heights will have 300+ units.
- New construction of 31 public housing units located on a site in the Fifth Ward near the intersection of Lyons and Worms, referred to as New Kelly.
- Clayton replacement units - New construction in multiple phases of up to 925 units of which 229 will be placed under PBV contract at 800 Middle Street.
- Clayton replacement units - New construction of approximately 435 mixed-income units at Jensen Street, of which 51% will be affordable to low and moderate-income households and 85 will be placed under PBV contract.
- Rehabilitation of 6000 Telephone Road, a 200 unit (HUD Section 202) senior living facility, with 9% Tax Credits.

Demolition/Disposition

Section 18 refers to process by which HUD authorizes Housing Authorities to dispose of or demolish public housing units. Disposition and/or demolition is oftentimes part of an overall redevelopment strategy. HHA plans to undertake the following Section 18 demolition/disposition activities in FY 2022:

- Proceed with disposition of the remaining portions of Clayton Homes to TXDOT. Relocation of Clayton Homes residents has begun and is projected to be completed by early FY 2022. Clayton Homes residents will receive first preference for replacement housing being developed at 800 Middle and 100 Jensen.
- Submit a disposition application for a portion of Kelly Village including land and approximately 50 units. A portion of the site will be sold to TXDOT in conjunction with a highway expansion project.
- Submit a demolition application for 10 units at Irvinton which was subject to severe hurricane-related flooding. FEMA will fund the demolition and the planned redevelopment of 10 units at Forest Green.
- Submit a disposition application for 2 small land parcels at Allen Parkway Village that do not include any HHA housing units or other residential amenities. The land will be disposed to an adjacent property owner.
- Submit a demolition and disposition application in conjunction with the planned redevelopment of the entire Forest Green development which suffered extensive hurricane-related flooding and other damages. FEMA funding will support the redevelopment.

**Revisions to the
Admissions & Continued
Occupancy Policy
(Public Housing)**

Admissions & Continued Occupancy Policy

- The Admissions & Continued Occupancy Policy (ACOP) establishes policies for HHA's public housing program. It is periodically updated to reflect HUD regulations and notices and HHA policy revisions.
- The ACOP is posted on HHA's website. The revisions proposed for FY 2022 are shown in a redline version which identifies any text that has been deleted, added or modified.
- The following slides present a summary of revisions proposed to the ACOP for FY 2022.

Admissions & Continued Occupancy Policy Revisions

In the Introduction, new language regarding MTW has been added:

HHA entered into a Moving to Work (MTW) Amendment to the Annual Contributions with the United States Department of Housing and Urban Development (“HUD”). This MTW designation allows HHA to design and test innovative methods of providing housing and delivering services to low-income households in an efficient and effective manner.

HHA’s participation in the expansion of the MTW demonstration is governed by the MTW Operations Notice for the Expansion of the Moving to Work Demonstration as it is issued and may be amended in the future, or any successor notice issued by HUD. As a participant in the MTW demonstration, HHA must operate in accordance with the express terms and conditions set forth in the MTW Operations Notice.

The term of the amendment is for 20 years from the beginning of the HHA’s first full fiscal year following execution by HHA and HUD; or, until termination of the MTW amendment to the ACC, whichever is sooner.

HHA is exempted from specific provisions of the Housing Act of 1937 (“the Act”) and its implementing regulations as specified in the MTW Operations Notice; however, HHA remains subject to all other applicable requirements including, but not limited to, those in Title 24 of the Code of Federal Regulations and Title 42 of the U.S. Code, Appropriations Acts.

Admissions & Continued Occupancy Policy Revisions

SECTION	CURRENT POLICY	PROPOSED NEW POLICY
Applicant's Right to Informal Hearing	HHA is currently utilizing temporary guidelines which are provided in Attachment A and are accessible at: http://www.housingforhouston.com/media/59975/houston%20housing%20authority%20remote%20hearing%20guidelines%20with%20hha%20letterhead	HHA is currently utilizing informal hearing guidelines as provided in Attachment A of this ACOP. Forms to request an informal hearing can be found on HHA's website at: www.housingforhouston.com
Applicant Screening Criteria	Applicants who owe money to HHA or any other housing authority will not be placed on the waiting list until their debt is paid in full.	Applicants who owe money to HHA or another housing authority will be informed of the debt, in writing, and given 10 business days from the date of the notice to provide verification of payment of the debt in full. Failure to provide verification that the debt was paid in full will result in an ineligible determination.

Admissions & Continued Occupancy Policy Revisions

SECTION	CURRENT POLICY	PROPOSED NEW POLICY
Organizing the Applicant Waiting List	HHA will maintain a <u>centralized</u> waiting list format that records the type and size of apartment needed, each applicant's priority/preference status, the application number, and the race and ethnicity of the household head	HHA will maintain site-based waiting lists which include the type and size of apartment needed, each applicant's priority/preference status, the application number, and the race and ethnicity of the household head.
Making Unit Offers to Transferees and Applicants	All offers will be made in writing. Applicant will be given <u>14 business days</u> from the date reflected on the letter, to contact the property or appear for a lease meeting to determine eligibility.	All offers will be made in writing. Applicant will be given <u>15 business</u> days from the date reflected on the letter, to contact the property or appear for a lease meeting to determine eligibility.

Admissions & Continued Occupancy Policy Revisions

SECTION	CURRENT POLICY	PROPOSED NEW POLICY
<p>Making Unit Offers to Transferees and Applicants</p>	<ul style="list-style-type: none"> • The applicant must accept any apartment offered within 2 business days of the later of: • <u>The date the offer is communicated (by phone, mail, or the method of communication designated by an applicant with disabilities); or</u> <u>b. The date they are shown the apartment</u> 	<p><u>The applicant must accept any apartment offered within 2 business days of the later of:</u></p> <p><u>The date the offer is communicated (by phone, mail, or the method of communication designated by an applicant with disabilities);</u></p> <p>Where the unit offer is sent via UA mail, the date of offer is presumed to be 3 business days from the date of the letter;</p> <p>Where the unit offer is sent via email or by phone, the unit offer is presumed to be made on the date of the email or phone call; or</p> <p><u>The date they are shown the apartment.</u></p>

Admissions & Continued Occupancy Policy Revisions

SECTION	CURRENT POLICY	PROPOSED NEW POLICY
Community Service	N/A	<p><i>The following text is added at the beginning of the policy section for Community Service:</i></p> <p>“Due to the COVID 19 Pandemic, Community Service Self-Sufficiency Requirements have been suspended until April 30, 2022. Further details on the suspension can be found in Section XVI. HHA’s Adoption of HUD’s Across-the-Board Waivers Due to COVID-19 of this ACOP.”</p>

Admissions & Continued Occupancy Policy Revisions

SECTION	CURRENT POLICY	PROPOSED NEW POLICY
Determining Income and Rent	N/A	<p>HHA has been designated by the United States Department of Housing and Urban Development (HUD) as a Moving to Work (MTW) agency.</p> <p>Subsequent to HHA's MTW designation, HHA is required to implement rent reform per HHA's HUD approved MTW application.</p> <p>HHA, upon finalizing the rent reform initiative, will modify this Plan to reflect its rent reform policies.</p>

**Revisions to the Housing
Choice Voucher Program
Administrative Plan**

HCV Administrative Plan

- The Housing Choice Voucher (HCV) Program Administrative Plan establishes policies for HHA's HCV programs. It is periodically updated to reflect HUD regulations and notices and HHA policy revisions. Policies related to the Family Self Sufficiency (FSS) Program are included in a separate document, the FSS Action Plan, and are not part of the Administrative Plan.
- The Administrative Plan is posted on HHA's website. The revisions proposed for FY 2022 are shown in a redline version which identifies any text that has been deleted, added or modified.
- The following slides present a summary of revisions proposed to the Administrative Plan for FY 2022.

HCV Administrative Plan Revisions

SECTION	CURRENT POLICY	PROPOSED NEW POLICY
Chapter 1	N/A	Includes information on HHA MTW Designation and basic information.
Chapter 8 – Policy on Verification	Updated requirements concerning verifications.	Updates and clarifies verification requirements to match current HUD guidance. Adds language allowing the self-certification of excluded income.
Chapter 9 – Term of the Voucher & Extensions	Initial voucher term is 60 calendar days	Initial voucher term is 120 calendar days effective June 1, 2021. Extensions will be approved as a reasonable accommodation, or due to reasons beyond the family's control, as determined by HHA.

HCV Administrative Plan Revisions

SECTION	CURRENT POLICY	PROPOSED NEW POLICY
Chapter 9 – Payment Standards	<p>HHA uses Metropolitan Area Fair Market Rents to establish payment standards</p> <p>Reduced payment standards are applied to a family’s rent calculation at the second regular reexamination after the reduction.</p>	<p>HHA will use the Small Area Fair Market Rent to establish payment standards. SAFMRs are not applicable to the Project Based Program.</p> <p>Where payment standards decrease, HHA will not reduce the payment standard for the family during the term of the existing HAP contract.</p> <p>Clarified use of exception payment standards and requisite approval.</p> <p>Included info on payment standards and reasonable accommodations.</p>

HCV Administrative Plan Revisions

SECTION	CURRENT POLICY	PROPOSED NEW POLICY
Chapter 10 – Streamlined Recertification for Family Members with Fixed Income Sources	N/A	<ul style="list-style-type: none"> • HHA will conduct a streamlined income determination process for family members with fixed sources of income. Third party verification of all income sources will be obtained during the intake process and every three years thereafter. In the intervening years HHA will determine income from fixed sources by applying a verified cost of living adjustment (COLA) or rate of interest. However, upon request of the family, HHA will perform third-party verification of all income sources. • Fixed sources of income include Social Security and SSI benefits, pensions, annuities, disability or death benefits, and other sources of income subject to a COLA or rate of interest. The determination of fixed income may be streamlined even if the family receives income from non-fixed income sources. • If at least 90 percent of the family’s income is from fixed sources, HHA will streamline the verification of fixed income but will not verify non-fixed income amounts. • If the family receives less than 90 percent of its income from fixed sources, HHA will streamline the verification of fixed income and will conduct third party verification of non-fixed income annually. • If a family member with a fixed source of income is added, HHA will use third-party verification of all income amounts for that family member. • If verification of the COLA or rate of interest is not available, HHA will obtain third party verification of income amounts.

HCV Administrative Plan Revisions

SECTION	CURRENT POLICY	PROPOSED NEW POLICY
Chapter 12 – Determining Income and Rent	N/A	Adds policy statement on HHA’s MTW designation and impending rent reform initiative.
Chapter 12 – Fixed Income Families	<p>Current discretionary policy to apply alternate verification and calculations methods for fixed income adults. Policy is administratively burdensome and does not yield intended benefits for tenants or staff.</p> <p>For any family member with a fixed source of income, HHA will elect to determine that family member’s income by a streamlined income determination. Streamline income determination will be conducted by applying, for each fixed-income source, the verified cost of living adjustment (COLA) or current interest to the previously verified or adjusted income amount.</p>	Removes current policy.

HCV Administrative Plan Revisions

SECTION	CURRENT POLICY	PROPOSED NEW POLICY
Chapter 13 – Public Housing Units Selected	Moved to Appendix B	Moves table of public housing units to Appendix B.
Chapter 13 – Subsidy Layering Review	Updated references and requirements	Adds language concerning subsidy layering review requirements for new construction and rehab.
Chapter 13 – Organization of Wait List	N/A	Adds language concerning use of separate waiting lists for sets of PBV units.
Chapter 13 – Refusal of Offer	Revised language on actions taken when a PBV unit is refused	Adds language concerning actions HHA will and will not take for families on the PBV waiting list who refuse two PBV offers without good cause.
Chapter 13 – Good Cause Refusal of PBV Units	N/A	Adds language to define (and provide examples) of what HHA will consider to be “good cause” reasons to refuse an offer of a PBV unit.
Chapter 13 – Disapproval by the Landlord	Revised language concerning site-based waiting lists	Adds language to specify that a family will be removed from a site-based waiting list when the family is rejected by the owner.

HCV Administrative Plan Revisions

SECTION	CURRENT POLICY	PROPOSED NEW POLICY
Chapter 13 – Utility Reimbursements	Removed language about HHA options for utility reimbursements	Removes language specifying that HHA may opt to pay a utility reimbursement to the utility supplier directly, rather than to the family.
Chapter 14 – Rental Assistance Demonstration	N/A	Adds chapter on Rental Assistance Demonstration program.
Chapter 17 – Definitions	Removed language about HHA options for utility reimbursements	Removes language under the “Utility Reimbursement” definition about co-addressing the utility reimbursement to the utility company.
Appendix B	N/A	Moves table of public housing properties that HHA intends to project-based from Chapter 9.
Appendix C – RAD Conversions	N/A	Adds tables showing which HHA properties HHA converted to RAD and other information.

QUESTIONS & COMMENTS

Additional Resources

- HHA's FY 2022 documents (provided below) are available for review www.housingforhouston.com.
- [HHA Streamlined Annual PHA Plan FY 2022 \(HUD-50075 HP\) - DRAFT](#)
- [HHA FY 2022 Admissions and Continued Occupancy \(ACOP\) - DRAFT](#)
- [HHA FY 2022 Summary of ACOP Revisions - DRAFT](#)
- [HHA FY2022 Housing Choice Voucher Program Administrative Plan - DRAFT](#)
- [HHA FY 2022 Summary of HCV Administrative Plan Revisions- DRAFT](#)
- [FY 2021-2025 Capital Fund Program 5-Year Action Plan - DRAFT](#)

RAD Resources Available To Residents

- Materials available to residents include:
 - Rental Assistance Demonstration Information Notice (RIN)
 - General Information Notice (GIN) to Residential Tenant to Be Displaced, If Necessary for Construction Work
 - HUD brochure entitled, "Relocation Assistance To Tenants Displaced From Their Homes," which is also accessible at:
<https://www.hud.gov/sites/documents/tenadisp.pdf>
- RAD Photo Essay Series & Case Studies
(<https://www.hud.gov/RAD/news/case-studies>)

Reminder

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THANK YOU FOR YOUR
PARTICIPATION!