

PUBLIC NOTICE
PROPOSED REVISIONS TO THE ADMINISTRATIVE PLAN FOR FISCAL YEAR 2018-19

PUBLIC COMMENT PERIOD

January 16, 2019 – February 16, 2019

In accordance with Section 5A of the United States Housing Act of 1937 (USHA), as amended by Section 511 of the Quality Housing and Work Responsibility Act of 1998, the Housing Authority of the City of Daytona Beach (Housing Authority) has prepared an amended Administrative Plan for Fiscal Year 2018-2019 for public review and comment for a **thirty (30) day notice period**. The purpose is to review the proposed change and submit comments during this public comment period.

The Administrative Plan provides the Housing Authority's policies in the administrative of the program policies for the Housing Authority Housing Choice Voucher Program.

Included in the revisions are the following policy changes; 1) Implement Bi-annual inspections for tax credit properties within HCV (s); 2)Add disaster preference language 3) Revise Screening Requirements for Suitability as a Tenant; 4) Homeless Preference Revisions; 5) Update Waitlist purge process mailing requirements; 6)Implement Biannual recertifications for fixed income households; and 7) Increase Amount of Monthly income change to Family-Initiated Interim Reexaminations. Below are the revised changes which are available for a thirty-day public review and comment period, from January 16, 2019 to February 16, 2019.

Interested stakeholders wishing to make written comments or questions about the **Housing Choice Voucher Program** may mail them to the Housing Authority of the City of Daytona Beach (HACDB) 211 N. Ridgewood Avenue, Suite 300 to the attention of Gloria Bowens, Deputy Chief & Compliance Officer. Those who wish to make comments by telephone may call 386-253-5653 ext 311. You may also submit questions and comments at info@dbhaf.org or via fax at (386) 255-2136.

There is no public hearing requirement associated with these revisions.

Reasonable Accommodation: Persons requiring a special accommodation to participate in the public comment process may call Ms. Garvin, at HACDB central office at 386-253-5653 extension 306 or via email at garvingk@dbhaf.org.

The Daytona Beach Housing Authority does not discriminate on the basis of race, color, religion, national origin, ancestry, sexual orientation, age, familial status, or physical or mental disability in the access to its programs for employment, or in its activities, functions or services.

AMENDMENTS TO ADMINISTRATIVE PLAN

1. **Initiate Biennial Inspections for HCV Program (LIHTC) Section 8-II.C.**

The HACDB proposes to establish biennial inspections for its HCV Program to reduce expenditures and inspections for units that annually have HUD site inspections.

The following changes will be made to the PHA policy:

PHA Policy

- Each unit under HAP contract must be inspected within 12 months of the last full HQS inspection, unless it is a tax credit property that has annual site inspections and passed its last annual inspection. Properties that meet Biennial inspections will be identified and Owners notified that they have placed on a biennial inspections list.
- The PHA will accept the results of inspections performed by HUD or for other housing programs such as HOME or LIHTC. The PHA ~~currently~~ completes inspections using both in house staff and third party contractor.

2. **Add Disaster Preference Language (Section 4-III.B.)**

The authority recommends updating the current involuntary displacement language to address waitlist preferences for persons affected by a Federal Disaster. This amendment will expand the authority's ability to assist and house applicants nationally during and after a Federal Disaster.

The following updated preference provision is proposed for the Admin Plan's Tenant: Selection Method:

ADD TO PHA POLICY

- Notwithstanding the above, the Daytona Beach Housing Authority Chief Executive Officer is authorized to waive any of Daytona Beach Housing Authority's preferences, policies, or procedures in order to accommodate requests made by an authorized HUD representative as a result of a Federal Disaster declared by the President of the United States, to assist in the disaster recovery.

3. **Revise Screening for Suitability as a Tenant (Section 3-III.D.)**

The authority recommends removing the requirement requiring the housing authority to perform credit screening as part of suitability screening for Applicants of the HCV program. Credit screening is not a requirement of HCV suitability screening and is not HUD required for admission policies for HCV.

PHA Policy

The PHA may conduct additional screening to determine an applicant family's suitability for tenancy. The PHA will complete screening methods through HUD systems and the verification process to ~~will also conduct a credit screening to~~ verify assets, housing balances owed, and/or income.

4. Homeless Preference (Section 4-I.D.)

The housing authority recommends removing requirement-limiting percentage of annual admissions for homeless preference at 25% of new annual admissions. The Homeless Preference and referrals had been severely underserved as of November 2018 with one active current tenant in the HCV program. HACDB has completed an aggressive referral strategy to allocate lease up of 100% of 50 vouchers allocated within our Annual Plan within FY 2019. Thus, we recommend revising the annual admission requirement for this preference to address this housing strategy to decrease homelessness in Daytona Beach.

PHA POLICY

Homeless Preference: - A local preference will be established in the ~~Affordable Housing (Public) Program, and/or the~~ Housing Choice Voucher Program to provide housing assistance to homeless or chronically homeless individuals or families ~~up to 25% of the annual admissions~~. The Preference will be given to applicants on a referral only basis; and as certified as homeless by a social service agency as homeless and referred to HACDB under the terms and conditions of a Memorandum of Agreement.

1. homeless individuals and families,
2. chronically homeless,
3. individuals graduating from or aging out of the foster care program administered by the Florida Department of Protective and Regulatory Services; and
4. currently or formerly homeless applicants who are ready to transition from supportive housing program(s).

To qualify for the homeless preference applicants must be referred by a service agency that has a partnered with HACDB as a homeless service provider through a Memorandum of Agreement (MOU). The service provider will agree to provide HACDB with signed certification that the applicant meets the current HUD definition of homelessness, and is qualified to apply for housing under these criteria. In addition, the service provider will verify the number of types of supportive and/or case management referral services to be provided and the duration of services. Individuals referred that are chronically homeless, with co-occurring psychiatric, substance abuse, and chronic medical conditions may be referred after documented completion of receiving 12-24 months of rental assistance and intensive case management.

Applicants graduating or aging out of the foster care, or transitional housing must be referred, and certified as homeless under the terms and conditions of the agency Memorandum of Agreement. Currently HACDB has agreements in place with the following agencies:

- **CONTINUUM OF CARE/ VOLUSIA FLAGLER COUNTY COALITION FOR THE HOMELESS**
- SMA BEHAVIORAL HEALTH SERVICES, INC CITY OF DAYTONA BEACH
- DEVEREAUX FOUNDATION
- HALIFAX URBAN MINISTRIES (pending)
- DOMESTIC ABUSE COUNCIL
- COALITION ON HOMELESSNESS
- FAMILY RENEW.
- CITY OF DAYTONA BEACH

5. Update Waitlist purge process mailing requirements (Section 4-II.F.)

Remove requirement requiring the housing authority to mail to the Applicant forwarded mail returned to the housing authority when purging the waitlist.

- ~~If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 7 business days to respond from the date the letter was re-sent.~~

6. Initiate Biannual Re-examinations for Fixed income Households(Section 11-I.A.)

The HACDB proposes to establish biennial recertification for the HCV Program to streamline agency operations and reduce transactions with tenants that have fixed income. Overall, all references to annual re-examinations in Section 11 of the Administrative Plan regarding the processing of re-examinations to effective dates of the re-examination period will incorporate and be applicable to bi-annual reexaminations within the HCV process. The housing authority also recommends adding additional flexibility of processing annual recertifications by allowing the agency to administer mail-in recertifications to complete the annual/biannual recertification process. The ability to have mail-in recertifications allows tenants to complete the reexamination via mail and does not require an in person appointment.

The following changes will be made to the PHA policy.

PHA POLICY

- The PHA is required to reexamine each family's income and composition at least **bi-annually**, and to adjust the family's level of assistance accordingly. Interim reexaminations are also needed in certain situations. This chapter discusses both annual, **biannual**, and interim reexaminations, and the recalculation of family share and subsidy that occurs as a result. HUD regulations and PHA policies concerning reexaminations are presented in three parts:
- Part I: ~~Annual~~ Reexaminations. This part discusses the process for conducting annual/**bi-annual** reexaminations.
- Part II: Interim Reexaminations. This part details the requirements for families to report changes in family income and composition between annual reexaminations.
- Part III: Recalculating Family Share and Subsidy Amount. This part discusses the recalculation of family share and subsidy amounts based on the results of reexaminations.
- Policies governing reasonable accommodation, family privacy, required family cooperation, and program abuse, as described elsewhere in this plan, apply to both annual and interim reexaminations.

11-I.A. OVERVIEW

- The PHA must conduct a reexamination of family income and composition at least **biannually**. This includes gathering and verifying current information about family composition, income, and expenses. Based on this updated information, the family's income and rent must be recalculated. This part discusses the schedule for ~~annual~~ reexaminations, the information to be collected and verified, and ~~annual~~ reexamination effective dates.

11-I.B. SCHEDULING ANNUAL /BIANNUAL REEXAMINATIONS

- The PHA must establish a policy to ensure that the ~~annual~~ reexamination for each family is completed *within* a 12 month period for families with non-fixed income and a 24-month period for fixed income households, and may require reexaminations more frequently [HCV GB p. 12-1].

- The PHA will begin the annual/**biannual** reexamination process 90 days in advance of its scheduled effective date. Generally, the PHA will schedule annual reexamination effective dates to coincide with the family's anniversary date.
- *Anniversary date* is defined as 12 or 24 months from the effective date of the family's last reexamination or, during a family's first year in the program, from the effective date of the family's initial examination (admission).
~~If the family moves to a new unit, the PHA will perform a new annual reexamination.~~
- The PHA also may schedule an annual reexamination for completion prior to the anniversary date for administrative purposes.
- **Notification of and Participation in the Annual/Biannual Reexamination Process**
- The PHA is required to obtain the information needed to conduct ~~annual~~ reexaminations. How that information will be collected is left to the discretion of the PHA. However, PHAs should give tenants who were not provided the opportunity the option to complete Form HUD-92006 at this time [Notice PIH 2009-36].
- PHA Policy
- Families generally are required to participate in an reexamination interview, which must be attended by the head of household, spouse, co-head, or anyone over the age of 18. If participation in an in-person interview poses a hardship because of a family member's disability, the family should contact the PHA to request a reasonable accommodation (see Chapter 2).
- Notification of annual reexamination interviews will be sent by first-class mail and will contain the date, time, and location of the interview. In addition, it will inform the family of the information and documentation that must be brought to the interview.
- ~~The PHA may complete mail in reexaminations for households on annual or bi-annual reexaminations schedule.~~

7. Update Family-Initiated Interim Reexaminations (Section 11-II.C.)

The process of completing interims for family-initiated interims increases the work activity of HCV with little benefit to the housing authority to process small changes in income. A review of a 3 months of this fiscal year's rent changes show an average of \$2800.00 rent changes for all families within the program. The housing authority is recommending processing interims only where there is monthly increase of income of 300.00 or more, which would result in a rent change of approximately \$100.00 to the tenant. Changes of income that increase less than \$300.00 will not be processed. This change will allow the agency to streamline operations.

PHA POLICY

The PHA must adopt policies prescribing when and under what conditions the family must report changes in family income or expenses [24 CFR 982.516(c)]. In addition, HUD regulations require that the family be permitted to obtain an interim reexamination any time the family has experienced a change in circumstances since the last determination [24 CFR 982.516(b)(2)].

Required Reporting

HUD regulations give the PHA the freedom to determine the circumstances under which families will be required to report changes affecting income.

PHA Policy

Families are required to report all increases in earned income, including new employment, within 10 business days of the date the change takes effect.

The PHA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and when the EID family's rent will change as a result of the increase. In other cases, the PHA will increase the rent, if the monthly increase in income is ~~\$200~~-\$300, or

more or ~~\$2400~~ \$ 3600 on an annual basis. In other cases the information will be noted in the tenant file, but will not conduct an interim reexamination.