

Annual PHA Plan <i>(Standard PHAs or Troubled 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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2016

Housing Authority of the City of Daytona Beach (HACDB)

AGENCY PLAN TABLE OF CONTENTS

SUBMISSION LETTER

HUD FORM 50075-ST

ATTACHMENTS

- 1 STATEMENT OF FINANCIAL RESOURCES
- 2 DECONCENTRATION POLICY
- 3 2015 CAPITAL FUN PROGRAM HUD APPROVAL LETTER -10-9 15
- 4 Civil Rights Certification
- 5 Certification Of Compliance With PHA Plans And Related Regulations
- 6 Certification By State Or Local Official Of PHA Plans Consistency With The Consolidated Plan
- 7 Public Ads For Notices Of Hearings
- 8 RAB Meeting Summary & Sign-In Sheets
- 9 Public Hearing Summary & Sign In Sheets
- 10 ADMISSIONS & CONTINUED OCCUPANCY POLICY (ACOP)
- 11 HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN

THE HOUSING AUTHORITY

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Anthony E. Woods
Executive Director / CEO

April 15, 2016

VIA FEDERAL EXPRESS

Vicki L. Abel
Office of Public Housing
Charles Bennett Federal Building
400 W. Bay Street, Suite 1015
Jacksonville, FL 32202-4410

RE: Annual Plan Submission

Dear Ms. Abel:

Enclosed for your review and consideration is The Housing Authority of the City of Daytona Beach's Annual Plan and required documentation for fiscal year beginning July 1, 2016.

Should you have any questions or require additional information, please advise.

Sincerely,

Anthony E. Woods
Executive Director / CEO



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

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, 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: <u>HOUSING AUTHORITY OF THE CITY OF DAYTONA BEACH</u> PHA Code: <u>FLOO7</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning : 07/01/2016 PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>779</u> Number of Housing Choice Vouchers (HCVs) <u>1337</u> Total Combined Units/Vouchers <u>2116</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission

Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

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?

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.
- Operation and Management.
- Grievance Procedures.
- Homeownership Programs.
- Community Service and Self-Sufficiency Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Asset Management.
- Substantial Deviation.
- Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

(c) The PHA must submit its Deconcentration Policy for Field Office review. Attachment 1

Strategy for Addressing Housing Needs

B.1 Strategy for Addressing Housing Needs

The Housing Authority of the City of Daytona Beach is dedicated to providing assistance for affordable, attractive, and safe housing to extremely low, very low, low, and moderate-income families and self-sufficient opportunities for its residents.

Over the course of the last several months there has been an increase in the evidence of homeless families in and around the City of Daytona Beach. A "Point in Time" homeless count was conducted January 26, 2016 to give area agencies a snapshot of the number of homeless people in Volusia and other counties across the nation. The U.S. Department of Housing and Urban Development requires communities to complete the Point-in-Time count each year in order to receive adequate funding. As a public agency it is imperative that we know our community, and the level of services needed in our immediate area.

Estimates by the Volusia-Flagler Continuum of Care as of January 27, 2015*

	Sheltered			Unsheltered	Total
	Emergency	Traditional	Safe Haven		
Total Number of Households	185	185	0	699	1,069
Total Number of Persons	218	332	0	777	1,327
Number of Children (under age 18)	24	119	0	78	221
Number of Persons (18 to 24)	9	20	0	29	58
Number of Persons (over age 24)	185	193	0	670	1,048

Due to this increase in the overall needs of homeless individuals the HACDB recognizes that one its responsibilities is to network and coordinate services with other representatives in our geographic area. From a HUD conference call on January 20, 2016, on “Ending Homelessness in Florida”, many of us learned that there are a number of supportive resources that we can tap into, as a permanent housing provider. And HACDB is making a call to other service agencies to partner with us in establishing coordinated entry and prioritization of services to maximize our impact by creating immediate housing opportunities for the people who are in most need.

In ensuring the HACDB is providing services consistent with the City of Daytona Beach, we completed an analysis of data from the City’s Consolidated Plan on the supply for decent, safe, sanitary and affordable housing for its residents with needs, including income constrained households, persons with special needs and homeless individuals. The relationship between the City of Daytona Beach and the Housing Authority of Daytona Beach has been an effective and primary means to maintaining housing stock, creating additional housing opportunities, and expanding fair housing choices.

Housing Needs of Families in the Jurisdiction by Family Type

Family Type Overall Affordability Supply Quality Accessibility Size Location

Family Type	Overall	Affordability	Supply	Quality	Accessibility	Size	Location
Income <= 30% of AMI	2,893	5	5	5	5	5	5
Income >30% but <=50% of AMI	2,110	4	4	4	4	4	4
Income >50% but <80% of AMI	1,738	3	3	3	3	3	3
Elderly	1,281	4	3	3	4	3	3
Families with Disabilities	N/A	3	3	3	5	3	3

Race/Ethnicity White	4,295	3	3	3	3	3	3
Race/Ethnicity Black	2,353	3	3	3	3	3	3
Race/Ethnicity Hispanic	320	3	3	3	3	3	3

The following sources of information the HACDB used to conduct this analysis. (All materials are made available for public inspection.) 2011-2015 Consolidated Plan of the Jurisdiction U.S. Census data: the Comprehensive Housing Affordability Strategy

We have additionally reached out to the other housing agencies within this jurisdiction to join us in addressing the homeless and chronic homeless issues within Volusia County, Florida; by encouraging active participation and membership in the Volusia / Flagler CoC. HACDB is partnering with the Veterans Administration, and has successfully managed The VASH Program, in Daytona Beach, which has resulted in a “Functional Zero” designation through VASH in reaching and reducing homeless for Veterans in Volusia County.

We believe that by extending this model to both our Affordable and Housing Choice Voucher Programs, we can successfully align resources by developing a funding collaborative to increase the range and availability of affordable and supportive housing options to move families from homelessness.

In the upcoming year the Housing Authority of the City of Daytona Beach will commit the following resources in addressing a “Move Up” Housing Initiative:

1. Modify existing policies in an effort to minimize and or remove barriers for eligible applicants.
2. Create and implement a local homeless/chronic homeless preference in both the Affordable Housing and Housing Choice Voucher Programs.
3. Utilize a portion of our current HCV allocation to provide permanent rental housing assistance.
4. Provide permanent rental housing for homeless/chronically homeless individuals in the Affordable Housing Program.
5. Continued participation of the VASH Program to assist homeless Veterans. HUD-VASH is a partnership between HACDB and the Volusia VA Outpatient Clinic. *The program provides*

Housing Choice Voucher (HCV) rental assistance for homeless veterans, with case management and clinical services provided by the VA Outpatient clinics.

A local preference will be established in the Housing Choice Voucher (HCV) and the Affordable (Public) Housing Programs to annually assist up to 100 homeless or chronically homeless individuals or families, per respective program. The preference will give priority to:

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).

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions

In addition our admission practices are designed to lessen the concentration of poverty and to create mixed-income communities and within the agencies geographic locality by bringing higher income residents to lower income developments and lower income residents into higher income developments; enhancing opportunity, principally for extremely low-, low-income, and moderate-income residents. The location of our Affordable Housing units ensures service delivery in areas that facilitate access by low income households and minorities. Based on policy program entry is based on a first come/ready first served basis; however, homeless households, and chronically homeless certified homeless, will be eligible for housing on a priority basis. The agencies Deconcentration Plan for Eligibility is attached (see Attachment 1). In addition to addressing the issue of homelessness, the agency has outlined the following specific strategies for addressing housing needs in the City of Daytona Beach, as follows:

Strategies

Need: Shortage of affordable housing for all eligible populations

Strategy: Maximize the number of affordable units available to the HACDB within its current resources by:

- Employ effective maintenance and management policies to minimize the number of public housing units offline
- Reduce turnover time for vacated public housing units
- Reduce time to renovate public housing units
- Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction, regardless of unit size
- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies

Strategy: Increase the number of affordable housing units by:

- Apply for additional section 8 units should they become available
- Leverage affordable housing resources in the community through the creation of mixed - finance housing
- Pursue housing resources other than public housing or Section 8 tenant-based assistance
- Seek replacement of public housing units lost to the inventory through mixed finance development
- Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources

Need: Specific Family Types: Families at or below 30% of median

Strategy: Target available assistance to families at or below 30 % of AMI

- Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing
- Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance

Need: Specific Family Types: The Elderly

Strategy: Target available assistance to the elderly:

- Maintain designation of public housing for the elderly
- Apply for special-purpose vouchers targeted to the elderly, should they become available

Need: Specific Family Types: Families with Disabilities

Strategy: Target available assistance to Families with Disabilities:

- Apply for special-purpose vouchers targeted to families with disabilities, should they become available
- Maintain designation of public housing for the elderly and disabled

Strategy: Conduct activities to affirmatively further fair housing

- Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- Market the section 8 program to owners outside of areas of poverty /minority concentrations

Reasons for Selecting Strategies

The factors listed below, influenced the HACDB's selection of the strategies it will pursue:

- Funding and Staffing constraints
- Limited availability of sites for assisted housing
- Extent to which particular housing needs are met by other organizations in the community
- Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the HACDB
- Influence of the housing market on HACDB programs
- Results of consultation with local or state government
- Results of consultation with residents and the Resident Advisory Board
- Results of consultation with advocacy groups

Financial Resources A statement of financial resources, by general categories, for the fiscal year indicate that the agency has sufficient resources to maintain and operate all programs in accordance with [\(24 CFR §903.7\(c\)\)](#) for the year. Currently the agency does not receive any non-Federal sources of funding. The agency intends to apply for additional funding for continued and/or additional programming, as notifications of additional fund through NOFA's or other opportunities arise, throughout the year (see attachment 2).

Rent Determination

No changes were made in policies regarding establishment of rents for the Affordable Housing or HCV program. Flat rents, payment standards and FMR's, are reviewed and updated annually as they relate to policy [\(24 CFR §903.7\(d\)\)](#). The HACDB initiated the process on the new flat rent policy per HUD guidelines, as of 10/1/14. HACDB is currently reviewing the Federal Register release of Vol. 81, No. 45 March 8, 2016, on Streamlining Administrative Regulations for Public Housing, Housing Choice Voucher, Multifamily Housing, and Community Planning and Development Program; Final Rule regarding Streamlined Annual Reexamination for Fixed Incomes, Earned Income Disregard (EID), Family Declaration of Assets under \$5,000, and Utility Reimbursements to determine, effective, internal procedures to implement these changes during the 2016-2017 fiscal year. All proposed changes, will be submitted for Board approval prior to final implementation of changes.

Reporting Requirements for Changes in Income

PHA's must adopt policies prescribing when and under what conditions the family must report changes in family income or expenses. HUD gives PHA the latitude to determine the circumstances under which families will be required to report changes affecting income. Under current HACDB policy the family is required to report in writing within 10 calendar days from the date of occurrence, which will result in an interim.

To reduce the administrative burden of interim changes families will not be required to report the following changes:

- Cost of living adjustments to Social Security, TANF, and Veterans Assistance
- A total household income increase of less than \$300 monthly or less than \$3,600 annually.

No changes are being made in policies regarding the additional of family members.

Operation and Management

The Admissions and Occupancy Policy (ACOP) and Administrative Plan for the Housing Choice Voucher Program have been reviewed to ensure compliance with the latest Housing and Urban Development rules and regulations. The HACDB ACOP and Administrative Plan are consistent with the Equal Access Rule (sexual orientation and gender identity and the term family). The updated 2016 versions of these documents are attached (attachment 3 & 4). Guidance for Maintenance Operations is completed under the HACDB Maintenance Policies (attachment 5); which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA. No changes have been made in the agencies Grievance Procedures, which provide all HACDB residents an opportunity to grieve any PHA actions or failure to act involving lease termination, or other actions that may adversely affect tenancy, welfare, and/or status.

Homeownership

HACDB had one remaining home ownership unit in its inventory, at 712 Vernon Street, Daytona Beach, Florida; this unit was sold in November, 2015. There are remaining lots that are platted and plotted, and pending build out. HACDB is seeking partnership opportunities to complete this program.

Community Service and Self-Sufficiency Programs

Per regulation all qualifying family members must complete eight (8) hours of community service per month, unless otherwise exempted. HACDB will allow an individual to complete 8 hours each month or aggregate the hours across the year. Any blocking of hours will be deemed acceptable as long as 96 hours is completed, and HACDB is able to verify completion at each annual certification. Hours must be performed within the jurisdiction of the HACDB.

Safety and Crime Prevention

No changes are being made in the PHA Safety and Crime Prevention Policies. Currently HACDB is working to maintain a good rapport with DBPD to ensure open channels of communication for

maintaining safe neighborhood for our residents. We have implemented regulations regarding the provisions of VAWA. **The Housing Authority of the City of Daytona Beach VAWA Policy has the following principal goals and objectives:**

- Maintaining compliance with all applicable legal requirements imposed by VAWA;
- Insuring the physical safety of victims of actual or threatened domestic violence, dating violence, or stalking who are assisted by the Housing Authority of the City of Daytona Beach;
- Providing and maintaining housing opportunities for victims of domestic violence dating violence, or stalking;
- Creating and maintaining collaborative arrangements between the Housing Authority of the City of Daytona Beach, law enforcement authorities, victim service providers, and others to promote the safety and well-being of victims of actual and threatened domestic violence, dating violence and stalking, who are assisted by the Housing Authority of the City of Daytona Beach; and
- Taking appropriate action in response to an incident or incidents of domestic violence, dating violence, or stalking, affecting individuals assisted by the Housing Authority of the City of Daytona Beach.

HACDB Policies are in compliance with all applicable legal requirements imposed by VAWA for insuring the physical safety of victims of actual or threatened domestic violence, dating violence, or stalking who are assisted by the Housing Authority of the City of Daytona Beach. These policies ensure that appropriate action is taken in response to an incident or incidents of domestic violence, dating violence, or stalking, affecting individuals assisted by the Housing Authority of the City of Daytona Beach, in both the Affordable Housing and Housing Choice Voucher Programs.

HACDB will be submitting an application for HUD NOFA related to Emergency Safety and Security Grants.

Pet Policy

No changes are being made in the PHA's Pet Policy.

Asset Management

HACDB is engaged in asset management of its public housing stock through development-based accounting and comprehensive stock assessment to plan for long-term operations, capital investments, rehabilitation, modernization, disposition, and other needs to sustain the current public housing inventory.

Substantial Deviation [24 CFR §903.7\(r\)\(2\)\(i\)](#)

The HACDB's Definition of Substantial Deviation and Significant Amendment or Modification is as follows:

- changes to rent or admissions policies or organization of the waiting list;
- additions of non-emergency work items (items not intended in the current 5-Year Action Plan); and
- any change with regard to demolition or disposition, designation, homeownership programs or conversion activities.

Significant Amendment/Modification [Notice PIH 1999-51. \(24 CFR §903.7\(r\)\(2\)\(ii\)\)](#)

The HACDB's Definition of Substantial Deviation and Significant Amendment or Modification is as follows:

- changes to rent or admissions policies or organization of the waiting list;
- additions of non-emergency work items (items not intended in the current Annual Statement); and
- any change with regard to demolition or disposition, designation, homeownership programs or conversion activities.

Additionally HACDB amended its flat rent policies to comply with the statutory changes contained within, Public Law 113 – 76, the Fiscal Year 2014 Appropriation Act, to ensure that flat rental amounts for each public housing unit complies with the requirement that all flat rents be set at no less than 80 percent of the applicable Fair Market Rent (FMR) adjusted, if necessary, to account for reasonable utilities costs.

To expedite the significant amendment process, HACDB is using HUD approved Significant Amendment language that PHAs may utilize for the purpose of conducting public hearings and submitting the significant amendment to HUD to update flat rent policies. PHAs that use the

language should not expect a written approval from HUD, and may enact the new flat rents within 90 days of submission of the significant amendment to HUD.

PHAs must maintain records that document the method used to determine flat rents, and also show how flat rents are determined by the PHA in accordance with this method as required by 24 CFR 960.253(b)(5).

Affordable Housing Waiting List

The Daytona Beach Housing Authority is making changes in policies that govern eligibility, selection, and admission to the Public Housing Program, and Housing Choice Voucher Program in Operations and Management of the Waiting List by including preferences to the order of selection(s); to allow for the leasing to those most in need.

Currently HACDB utilizes a two-step application process. Under the two-step process, families provide only the information needed to complete an on-line application, which places the family on the waiting list. In the second step the family is required to provide information necessary to establish family eligibility, proof of preference, and amount of rent the family will pay when selected; from the waiting list. The Affordable Housing Waiting List is open; applicants may complete an on-line pre-application, at our website at www.dbhaf1.org. Applications can be submitted from any location with internet access. In order to ensure families ease of access to the on-line system, HACDB partnered with local libraries, and our Neighborhood Network Centers to provide community wide locals that the application could be readily completed, and additionally, provided a separate phone number to call for assistance in completion of the online application. For persons with disabilities, elderly, Limited English proficiency (LEP), and requests for Reasonable Accommodation HACDB provides assistance with completion of the on-line application at any of our offices. Duplicates and incomplete applications are not accepted for entry by the online system. Applicants providing an email address receive written confirmation via email of receipt of the pre-application. Due to the designation of units at Maley and Windsor the 0/1 waiting list is closed indefinitely to persons who are not elderly (62 and older), disabled, or near elderly (50 to 61).

The Daytona Beach Housing Authority has a limited number of 0/1- bedroom units, in the Affordable Housing Inventory. All other applicants may apply for housing for any bedroom size for which they may qualify under the HACDB Occupancy Standards.

Applicant Orientation

All applicants selected from the waiting list, with the exception of elderly and disabled applicants, must attend an applicant orientation before they are determined eligible for participation. Generally, applicants are required to attend the briefing prior to admission or voucher issuance. However, HACDB may waive this requirement and admit applicants or issue a voucher to an applicant before he or she has attended, if doing so would remove a barrier for the family in quickly securing and/or leasing a suitable unit.

The need for Low Rent Public Housing (LRPH) assistance in Daytona Beach exceeds the availability of units, and our current waiting list shows that this scarce resource is in great demand.

Housing Needs of Families on the Public Housing Waiting List

	Number of Families	Annual Turnover Percent of Total Families
	10300	199
Elderly	331	0.03
Disabled	1291	0.13
Near elderly	637	0.06
Hispanic	1288	0.13
With children	5559	0.54
0 bedroom	808	0.078
1 bedroom	2376	0.231
2 bedroom	4090	0.397
3 bedroom	1969	0.191
4 bedroom	596	0.058
5 bedroom	39	0.004
6 bedroom	422	0.041
Extremely low	8027	0.78
Very low	1026	0.10
Low	915	0.09
1-White	2962	0.29
2-Black	7208	0.70
3-American Indian	92	0.01

4-Asian	27	0.00
5-Native American	11	0.00

However, we do not want housing units in our affordable housing program to be considered as housing of last resort, all applicants will be screened according to the basic policies and standards set forth in the HACDB's Admissions and Continued Occupancy Policy (ACOP).

Required Denial of Admission

PHA's are required to establish standards that prohibit admission of an applicant to housing programs; if they have engaged in certain criminal activities, or if the PHA has reasonable cause to believe that a household member's current use and abuse of, and/or pattern of use of illegal drugs/alcohol may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents. PHA's may also determine the suitability of applicants regarding meeting financial obligations for program participation. To increase program lease up HACDB will examine applicant history by checking utilities, and general background information for the previous, (3) years of the date of waiting list selection. Such background checks will include:

1. PHA and landlords of other federally subsidized housing programs
2. Credit reports
3. Information on evictions and non-payment of rent-court records, evictions, judgements,
4. verification from FPL that the applicant can get utilities turned on in his/her name
5. landlord verification, to verify the applicant's ability to meet financial obligations.

Applicants with no rental payment history, will not be disqualified on this basis, but may be allowed to demonstrate financial responsibility through rent receipts and cancelled checks.

Where statutes require that the PHA prohibit admission for a prescribed period of time after some disqualifying behavior or event; HACDB will consider the factors, of all disqualifying behavior, using the concept of the preponderance of the evidence as the standard for making all admission decisions. Preponderance of the evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is evidence which as a whole shows that the fact sought to be proved is more probable than not. Preponderance of the evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

Preferences

PHA's are permitted to establish local preferences and to give priority to serving families that meet those criteria. Any local preference established must be consistent with the PHA plan and the consolidated plan, and must be based on local housing needs and priorities. Based on current needs and strategies for addressing housing HACDB is developing local Waiting List Preferences as defined below and shall be assigned points as indicated:

A. Local Preferences

Working Preference (20 points)—a preference will be assigned to applicants that live, work or have a verified offer of employment in Daytona Beach or Volusia County. To qualify for a Working Preference verification of the following is required:

1. Six (6) months of full-time continuous employment (Continuous employment is defined as: an average of twenty-eight (30) hours or more per week. An interruption of four (4) weeks or less is not considered a break in continuity. Consideration will be given for longer breaks in employment if the adult family members were working an average of twenty (20) hours per week and attending school or job training for ten (10) or more hours per week.)
2. Receipt of Social Security and SSI benefits will be considered employment for those unable to work because of age or verified disability.

Involuntary displacement (30 points) -Residents of Section 8, VASH, or other HACDB Housing Program who are who are in good standing (date the property was HUD approved for demolition/disposition, and due to no fault of their own are displaced.

1. Residents due to modernization, rehabilitation, or demolition/disposition, or loss of funding, are displaced from a HACDB housing program
2. Victims of federally-declared natural disasters who are displaced and HACDB receives verification from a 3rd party city, state, or federal agency of displacement.

Homeless Preference (50 points) A local preference will be established in the Affordable (Public) Housing Program to annually assist up to 50 homeless or chronically homeless individuals or families. The preference will give priority to:

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 certified as homeless by a social service agency as homeless and referred to HACDB under the terms and conditions of a Memorandum of Agreement.

To qualify for the homeless preference applicants must be referred by a service agency that has partnered with HACDB as a homeless service provider through a Memorandum of Understanding (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 services.

Under these preferences, HACDB will be able to expedite the provision of permanent housing services and options, without any time limits, or restrictions. We anticipate these changes will help leverage the agency's voucher utilization and occupancy rates, by providing housing stability to families that may not have previously been able to secure housing.

Preferences will not have the purpose or effect of delaying or otherwise denying admission to the program based on the race, color, ethnic origin, gender, religion, disability, or age of any member of an applicant family.

Income Targeting Requirement

HACDB will continue to monitor Income Targeting requirements for the Affordable Housing program in accordance with HUD guidance.

Selection from the Waiting List

The PHA Affordable housing and HCV waiting lists shall be organized in such a manner to allow the PHA to accurately identify and select families in the proper order, according to the admissions policies described in its ACOP for Affordable Housing Program/Housing Choice Voucher Administrative Plan.

Families will be selected from the waiting list based on preference points, and the date and time their pre-application is received by the PHA. All selections are made within preferences and for those without preference by date and time of application. The PHA will offer units to the highest ranking applicant who qualifies for that unit size or type, or that requires the accessibility features. If a selected preference cannot be verified at the time the applicant is selected from the waiting list, the applicant will be returned to the waiting list in the order he or she would have been ranked had the preference not been selected.

When selecting applicants from the waiting list the PHA will match the characteristics of the available unit (unit size, accessibility features, unit type) to the applicants. By matching unit and family characteristics, it is possible that families who are lower on the waiting list may receive an offer of housing ahead of families with an earlier date and time of application or higher preference status. Factors such as deconcentration or income mixing and income targeting will also be considered in accordance with HUD requirements and PHA policy.

HACDB may accept applications from preference applicants even when the waiting list may otherwise be closed. Previous residents, of the Affordable Housing Program, and/or the Housing Choice Voucher Program, may not be certified eligible for a preference, within 36 months of the date of any qualifying termination from any housing program. Placement on the waiting list does not indicate that the family is, in fact, eligible for assistance. In all cases a final determination of eligibility and qualification for preference will be made when the family is selected from the waiting list.

Housing Choice Voucher Program (HCV) Waiting List

HACDB has under the guidance and direction of HUD-Jacksonville implemented policies to continue to service the Section 8 families in the community consistent with the level of HCV Section 8 funding that is available. The Waiting List closed on 2/18/2015 and was re-opened on 12/28/15 and closed on 2/1/16, a total of 9,178 applicants applied using the agencies new on-line web application program.

At such time, as it is determined that the HCV waiting list is to be opened during the year, the opening and closing of the website will be advertised per policy in the local news papers and the agency's website. HACDB may allow families with specific preferences to apply to the program, during the year, while the waiting list remains closed.

Housing Needs of Families on the Housing Choice Voucher Waiting List

	Number of families	Annual Turnover Percent of total families
Waiting list total	9178	142
Extremely low income <=30% AMI	7487	81.58
Very low income (>30% but <=50% AMI)	824	8.98
Low income (>50% but <80% AMI)	733	7.99
Families with children	6491	70.73
Elderly families	348	.038
Families with Disabilities	33	.0035
Race/ethnicity White	2145	23.38
Race/ethnicity Black	6913	75.33
Race/ethnicity Hispanic	1273	13.87
Race/ethnicity Asian	26	0.0029
Race/ethnicity Other	94	0.024

The need for tenant-based rental assistance in the Daytona Beach, Florida area exceeds the number of Housing Choice Vouchers that are available. For the purpose of ordering the leasing of housing to those most in need or otherwise reflects the priorities of the Housing Authority of the City of Daytona Beach (HACDB); local preferences described below are being established.

Local Preferences

Working Preference (20 points)—a preference will be assigned to applicants that live, work or have a verified offer of employment in Daytona Beach or Volusia County. To qualify for a Working Preference verification of the following is required:

1. Six (6) months of full-time continuous employment (Continuous employment is defined as: an average of twenty-eight (30) hours or more per week. An interruption of four (4) weeks or less is not considered a break in continuity. Consideration will be given for longer breaks in employment if the adult family members were working an average of twenty (20) hours per week and attending school or job training for ten (10) or more hours per week.)
2. Receipt of Social Security and SSI benefits will be considered employment for those unable to work because of age or verified disability.

Involuntary Displacement (30 points) – a preference will be awarded to residents of the Affordable (Public) Housing Program, or other HACDB Housing Program who are displaced; through no fault of their own.

3. Residents due to modernization, rehabilitation, or demolition/disposition, or loss of funding, who are in good standing with DBHA, and are displaced due to no fault of their own.
4. Victims of federally-declared natural disasters who are displaced and DBHA receives verification from a 3rd party Agency of displacement.

Homeless Preference (50 points) A local preference will be established in the Housing Choice Voucher Program (HCV) Program to annually assist up to 50 homeless or chronically homeless individuals or families. The preference will give priority to:

5. homeless individuals and families,
6. chronically homeless,

7. individuals graduating from or aging out of the foster care program administered by the Florida Department of Protective and Regulatory Services; and
8. currently or formerly homeless applicants who are ready to transition from supportive housing program(s).

To qualify for the homeless preference applicants must be certified as homeless by a social service agency as homeless and referred to HACDB under the terms and conditions of a Memorandum of Agreement. The service provider will provide HACDB with signed certification that the applicant meets the 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

Special Category Vouchers

Veterans Affairs (VASH)

HACDB accepts VASH applicants as referrals in the order received from the Veterans Affairs Administration.

Income Targeting Requirement [24 CFR 982.201(b)(2)]

(a) HUD requires that extremely low-income (ELI) families make up at least 75% of the families admitted to the HCV program during the fiscal year. ELI families are those with annual incomes at or below 30% of the area median income. To ensure this requirement is met; HACDB may skip non-ELI families on the waiting list in order to select an ELI family.

(i) HACDB will monitor progress in meeting the ELI requirement throughout the fiscal year.

(ii) ELI families will be selected ahead of other eligible families on an as needed basis to ensure the income targeting requirement is met.

(b) Low income families admitted to the program that are “continuously assisted” under the 1937 Housing Act [24 CFR 982.4(b)], as well as low-income or moderate-income families admitted to the program that are displaced as a result of the prepayment of the mortgage or voluntary termination of an insurance contract on eligible low-income housing, are not counted for income targeting purposes [24 CFR 982.201(b)(2)(v)].

B.12

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

Hope VI or Choice Neighborhoods.

Mixed Finance Modernization or Development.

Hope VI/Choice Neighborhoods/Mixed Finance Development

The HACDB plans to apply for a HOPE VI and/or Neighborhood Choice Grants, and seek mixed financing development activities for affordable housing during the plan year. The HACDB may also use any such grants along with other agency funds for the construction/acquisition of new Affordable Housing for the Daytona Beach Community.

With approval of its Plan for use of its RHF, Part II Grant Funding the construction of 28 units at Northwood II were developed, and the official ribbon cutting was held on Thursday, November 19, 2015. In February, 2016, HACDB entered into a partnership agreement with Picerne Development Corporation for the development of Halifax II an 80 unit mixed finance property. Construction will begin 2016, with anticipated completion in 2017.

HACDB currently has in its inventory lots that are part of the agency's original homeownership program that were not developed due to lack of funding. It is anticipated that RHF Housing programs funds, can be used in conjunction with FHA, HOME, or Private Development investments to develop the now vacant lots to afford homeownership opportunities for eligible clients.

Y N

Demolition and/or Disposition.

HACDB plans to have a Comprehensive Strategic Capital Plan completed during the fiscal year. This plan when complete will provide the agency with a comprehensive long range plan to re-invigorate and redevelop all of its public housing stock.

Palmetto Park, Windsor Apartments, Caroline Village, Maley Apartments, Northwood Village, Walnut and Oak Apartments.

The plan when developed may require the HACDB to acquire land for site acquisition and may or may not involve the demolition or disposition of some or all the developments listed below. Currently, HACDB has had an appraisal completed on Walnut Oak apartments, and the agency is vigorously looking at measures to proceed with the disposition/sale of this property.

Development name:	Development (project) number:	Number of Units	Activity		Date for Planned Submission	TimeLine for Activity	
			Demolition	Disposition		Projected Start	Projected End
Palmetto Park	FL007-6	100	x	x	7/1/2016	10/1/2016	6/30/2017
Palmetto Park	FL007-7	30	x	x	7/1/2016	10/1/2016	6/30/2017
Windsor Apartments	FL007-8	150	x	x	7/1/2016	10/1/2016	6/30/2017
Caroline Village	FL007-10	100	x	x	7/1/2016	10/1/2016	6/30/2017
Maley Apartments	FL007-11	150	x	x	7/1/2016	10/1/2016	6/30/2017
Northwood, Walnut & Oak Apartments	FL007-15	77	x	x	7/1/2016	10/1/2016	6/30/2017

Y N

Non-Smoking Policies

HACDB's (2013) No Smoking Policies and Procedures were updated effective 1/31/15 to relocate designated smoking areas to 25 ft from any building, common area or hallway; to ensure smoke free environments are maintained for the residents, employees, and visitors of the HACDB properties

Y N

Project-Based Vouchers.

No plans for this fiscal year to project base HCV Vouchers.

	<p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>The HACDB may apply for a new HUD and other Grants during the next cycle to continue the redevelopment of its communities. The HACDB may also use any such grants along with other agency funds for the construction/acquisition of new Affordable Housing for the Daytona Beach Community. HACDB will submit applications for funding under the HUD NOFA related to Emergency Safety and Security Grants, MTW Funding, FSS, and ROSS Service Coordinators, and Jobs Plus, and Neighborhood Choice Grants for Demonstration and/or Implementation. HACDB believes that funding allocations under these programs will greatly enhance the service delivery to clients currently, served, and will allow the agency to further leverage resources to increase the range and types of services being provided.</p>
B.3	<p>Civil Rights Certification.</p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations is attached.</i></p>

B.4

Most Recent Fiscal Year Audit.

(a) Were there any findings in the most recent FY Audit?

Y N

If yes, please describe:

An administrative contract for security services was over the policy threshold, for renewal.

The Authority will implement procedures to ensure all contracts are procured in accordance to policy and procedures. The first initiative is to create a Contract Log to include the following pertinent information: name, contract amount and the terms of agreement. A computerized tickler system for reoccurring contract will be developed and maintained, and monitored, regarding contract status.

B.5

Progress in Meeting Mission and Goals (*Brief Statement of Progress in Meeting 5-Year Plan Mission and Goals*)

Mission

The Housing Authority of the City of Daytona Beach is dedicated to providing assistance for affordable, attractive, and safe housing to extremely low, very low, low, and moderate-income families and self-sufficient opportunities for its residents.

The HACDB has been able to maintain its mission to promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination through the utilization of previous Capital funds and the proper application of our public housing policies. We are continuing to address public housing vacancies very aggressively and our PHAS/SEMAP scores indicate that other operational issues are being positively addressed. Capital funds have been utilized to provide modernization of our properties and our FY 2016 application will continue this effort.

HACDB continues to improve living environment by addressing deconcentration, promoting income mixing, and improving security throughout our developments. HACDB created and continues to facilitate self-sufficiency programs to improve resident employability as well as solicit support services for the elderly and families with disabilities. The implementation of a family pet policy has provided the opportunity for residents to enjoy pets within a regulated environment. HACDB has implemented its Community Service program per HUD notification and each adult member of every household has been notified as to their status. We are confident that the HACDB will be able to continue to meet and accommodate all our goals and objectives for FY 2016.

Goal #1

Improve customer service delivery by enhancing operational efficiency; coordinating with community providers; and improving facilities.

The Housing Authority of the City of Daytona Beach (HACDB) continues to meet its objective under this goal and the pursuit is an ongoing process. The Board of Commissioners and Executive Director continually implement improvements to the organization and update the preventative maintenance program for curb appeal. Over the last two years we have updated the plan and improved our services. During the next year we will strive to continue to increase efficiency.

Goal #2

Investigate redevelopment alternatives, identify professional support, and quantify sources of funding.

During the past several years this agency has been successful in completing two Hope VI Grants for three of our oldest developments. We will continually pursue redevelopment opportunities. We have recently gone through the RFQ process, identified a developer and our legal teams that will assist us with these future development opportunities. Additionally, we shall continue meeting regularly with city, county and state organizations to continue partnerships.

Goal #3

The Housing Authority of the City of Daytona Beach has developed 5 scattered site housing units with the preference for homeownership.

These five (5) homes have been built, and sold. The agency has additional property; it may convert to this program in the future.

Goal #4

The Housing Authority of the City of Daytona Beach will strive to provide its staff with initiative and customer driven attitudes by team spirit, flexibility in meeting job responsibilities, and personal career goals.

As a continuing process, HACDB reviews customer satisfaction through monitoring of complaints from residents and vendors. We continually train staff on ethics and customers relations. Each staff person is put through a yearly training on Fair Housing, Reasonable Accommodations, Sexual Harassment, and Ethics. This training is completed to improve our customer services, and ensure we have an informed staff.

Goal #5

The Housing Authority of the City of Daytona Beach will increase opportunities for the residents to become self-sufficient.

Neighborhood Network Centers have been developed NNC's at three our family sites. sites. Soft skills, GED and computer literacy classes are offered and recreational programs, such as the Best Summer Ever Program, and Summer Lunch Programs.

Resident Advisory Board (RAB) Comments.

(a) Did the RAB(s) provide comments to the PHA Plan?

Y N

Resident Advisory Board (RAB)

The Resident Advisory Board Meeting is scheduled for March 11, 2016, and a Public Hearing is scheduled on March 30, 2016.

(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. No comments related to the submission of the plan and HACDB policies and procedures were received at the RAB meeting.

	<p>The Public hearing was called to order on March 30, 2016 at 10:15 a.m., and having no residents in attendance, the meeting was adjourned at 10:45 a.m.</p>
<p>B.7</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>B.8</p>	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C.</p>	<p>Statement of Capital Improvements.</p> <p>The most recent HUD-approved 5-Year Action Plan (HUD-50075.2) was approved by HUD on 10/09/15. The approval letter is attached.</p>

HOUSING AUTHORITY OF THE CITY OF DAYTONA BEACH

Attachments

- 1 STATEMENT OF FINANCIAL RESOURCES
- 2 DECONCENTRATION POLICY
- 3 2015 CAPITAL FUN PROGRAM HUD APPROVAL LETTER -10-9 15
- 4 Civil Rights Certification
- 5 Certification Of Compliance With PHA Plans And Related Regulations
- 6 Certification By State Or Local Official Of PHA Plans Consistency With The Consolidated Plan
- 7 Public Ads For Notices Of Hearings
- 8 Rab Meeting Summary & Sign-In Sheets
- 9 Public Hearing Summary & Sign In Sheets
- 10 ADMISSIONS & CONTINUED OCCUPANCY POLICY (ACOP)
- 11 HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN

Attachment 1

HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

PHA Name: HOUSING AUTHORITY OF THE CITY OF DAYTONA BEACH

PHA Code: FLOO7

Statement of Financial Resources

12/31/2015

Financial Resources:		
Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (CY 2015 grants)		
a) Public Housing Operating Fund	2,908,751	2,908,751
b) Public Housing Capital Fund	875,509	0
c) Housing Choice Vouchers Funds		
d) Resident Opportunity and Self-Sufficiency Grant	86,563	86,563
e) Community Development Block Grant		
f) HOME		
g) Choice Neighborhood		
h) Other Federal Grants (list below)		
1. Replacement Housing Factor - 2015	452,910	0
2. Prior Year Federal Grants (unobligated funds only) (list below)		
2013 CFP	751,876	734,983
2014 CFP	797,845	27,950
2014 RHF	48,114	0
3. Public Housing Dwelling Rental Income		
a) AMP 1 – Elderly	827,925	827,925
b) AMP 2 – Family	536,351	536,351
c) AMP 20 – Northwood II	20,502	20,502
4. Other Income		
5. Non-federal sources (list below)		
Total Resources	7,306,346	5,143,025

Attachment 2

HOUSING AUTHORITY OF THE CITY OF DAYTONA BEACH

DECONCENTRATION POLICY

Adopted April 15, 2016

I. INTRODUCTION

The Quality Housing and Work Responsibility Act of 1998 (QHWRA) requires that the Housing Authority of the City of Daytona Beach adopt policies and procedures governing the deconcentration of poverty and income mixing as required by section 10(a)(3)(B) of the 1937 Housing Act. It is the Housing Authority of the City of Daytona Beach's (HACDB) policy to provide for deconcentration of poverty and encourage income mixing.

The goal of this policy is lessen the concentration of poverty and to create mixed-income communities and within the HACDB's public housing developments. This will be accomplished through admissions practices designed to bring in higher income residents to lower income developments and lower income residents into higher income developments.

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)].

HACDB Developments are exempt, as the properties are designed elderly or elderly mixed, or the total unit count is 100 units or less. However, HACDB will review the specified criteria for its developments, to maintain mixed income communities in a non-discriminating manner at all of its communities.

The Deconcentration Policy is intended to work in conjunction with the Authority's annual income targeting requirements. The QHWRA requires that 40 percent of all new admissions to public housing developments during a fiscal year must be residents whose household income, at the time of admission, is equal to or lower than 30 percent of the Area Median Income. This "income targeting" requirement is separate from the Deconcentration Policy, which is comparative in nature.

The HACDB will affirmatively market housing to all eligible income groups. Lower income residents will not be steered toward lower income developments and higher income people will not be steered toward higher income developments.

II. DEFINITIONS

The following definitions are provided in order to clearly and define the affected developments and families under this Deconcentration Policy.

III. ANALYSIS

In order to achieve and maintain deconcentration, the HACDB will comply with the following:

- a) Determine the PHA-Wide Established Income Range for all covered developments at least an annual basis.
- b) Determine the average household income for each covered development.
- c) Determine whether each covered development falls above, within, or above the established income range.
- d) Determine, for those developments having average incomes outside the established income range, if there are factors to explain and/or justify the income profile as being consistent with and furthering two sets of goals: the goals of deconcentration and income mixing as specified by the statute; and the local goals and strategies contained in the HACDB Annual Plan.
- e) Where the income profile for a covered development is not explained and/or justified in the HACDB Annual Plan a specific policy to provide for deconcentration and income mixing in applicable covered developments.

Analysis will be completed at least annually, but may be accomplished more frequently to determine the effectiveness of various initiatives employed to achieve deconcentration.

IV. ACTION PLAN

If a covered development has been identified as falling above or below the established income range, the HACDB will define and communicate specific procedures to be employed with the goal of achieving deconcentration. It is the goal of the HACDB to generally increase the level of income for residents of public housing, create more stratified developments, and obtain agency self-sufficiency, therefore; the Deconcentration Policy shall not be employed to be counterproductive to that goal. In addition, the policy will, under no circumstances, be employed through steering or in any way reducing the choice in residence of the individual family.

In order to deconcentrate a development, the HACDB will contact the first family on the waiting list who has the highest priority for this type of unit or development and whose income category would help to meet the deconcentration goal and/or the income-targeting goal. To the greatest extent possible, the HACDB will provide incentives to encourage families with incomes below the established income range to accept units in developments with incomes above the

established income range or to encourage families with incomes above the established income range to accept units in developments with incomes below the established income range.

The HACDB 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. These may include but are not limited to:

- a) Rent Incentives to select particular developments.
- b) Payment Plans for deposits.
- c) Flexibility in move-in dates.

A family has the sole discretion whether to accept an offer of a unit made under the HACDB's deconcentration policy. HACDB shall not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the deconcentration policy.

Glossary of Terms

Covered Developments: Public housing developments that are of general occupancy or family public housing developments that are not exempt from the deconcentration requirement.

Exempt Developments: Public housing developments that are operated by housing authorities with fewer than 100 units; public housing developments that house only elderly persons or persons with disabilities, or both; public housing developments operated by housing authorities that operate only one general occupancy development; public housing developments approved for demolition or conversion to tenant-based assistance; and public housing developments that include units operated in accordance with a HUD-approved mixed-finance plan using HOPE VI or public housing funds awarded before the effective date of the Deconcentration Final Rule.

PHA-Wide Established Income Range: The average annual household income of all residents of all covered developments.

Development Average Household Income: The average annual household income of all residents of a specific covered development.

Developments Outside the PHA-Wide Established Income Range: A development where the Development Average Household Income is between 85 percent and 115 percent of the PHA-Wide Established Income Range.

- 3 2015 CAPITAL FUN PROGRAM HUD APPROVAL LETTER -10-9 15
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