

<b>Annual PHA Plan (Standard PHAs and Troubled PHAs)</b>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
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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, including changes to these policies, 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.** The 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** 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, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 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 exceed 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.

<b>A.</b>	<b>PHA Information.</b>											
A.1	<p>PHA Name: <u>PALM BEACH COUNTY HOUSING AUTHORITY</u>                      PHA Code: <u>FL080</u> PHA Type: <input type="checkbox"/> Standard PHA <input checked="" type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/2024</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>428</u>    Number of Housing Choice Vouchers (HCVs) <u>3117</u> Total Combined Units/Vouchers <u>3545</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission    <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. 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.</p> <p><b>How the public can access this PHA Plan:</b> PBCHA's proposed Annual Plan and Public Hearing Information can be found at the following locations: 1. Palm Beach County Housing Authority Administrative Office, 3333 Forest Hill Blvd, West Palm Beach, FL 33406 2. Dyson Circle Apartments, 4695 N. Dyson Circle, West Palm Beach, FL 33415 3. Schall Landings Apartments, 2402 Schall Circle, West Palm Beach, FL 33417 4. Seminole Estates, 6388 Seminole Circle, Lantana, FL 33462 5. Drexel House Apartments, 1745 Drexel Road, West Palm Beach, FL 33417 6. Housing Authority Website: <a href="http://www.pbchaf.org">http://www.pbchaf.org</a> 7. Resident Advisory Board (RAB) Members received an electronic and/or hard copy of all Draft Plans referenced above.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" data-bbox="160 1480 1534 1530"><thead><tr><th rowspan="2">Participating PHAs</th><th rowspan="2">PHA Code</th><th rowspan="2">Program(s) in the Consortia</th><th colspan="2">Program(s) not in the Consortia</th><th colspan="2">No. of Units in Each Program</th></tr><tr><th>PH</th><th>HCV</th><th>PH</th><th>HCV</th></tr></thead><tbody></tbody></table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia		No. of Units in Each Program		PH	HCV	PH	HCV
Participating PHAs	PHA Code				Program(s) in the Consortia	Program(s) not in the Consortia		No. of Units in Each Program				
		PH	HCV	PH		HCV						

<b>B.</b>	<b>Plan Elements.</b>
<b>B.1</b>	<p><b>Revision of Existing PHA Plan Elements.</b>  (a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p><b>Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</b>  See attachment A (Administrative Plans Revisions) See attachment B (ACOP Plan Revisions)</p> <p><b>Financial Resources.</b>  Financial Resources: Planned Sources and Uses Sources Planned \$ Planned Uses 1. Federal Grants (FY 2025 grants) a) Public Housing Operating Fund \$1,740,250 Administration and Maintenance under the Operating Fund program. b) Public Housing Capital Fund 1,650,000 Administration, Maintenance and Capital Improvements under the Capital Fund program. c) Capital Fund Recovery Grant -0- d) HOPE VI Revitalization -0- e) HOPE VI Demolition -0- f) Annual Contributions for Section 8 Tenant-Based Assistance 36,582,500 Administration and Housing/Utility Assistance Payments under HUD Section 8 programs. g) Public Housing Drug Elimination -0- h) Resident Opportunity and Self-Sufficiency Grants, including Family Self-Sufficiency 219,250 Administration under the ROSS and FSS program. i) Community Dev. Block Grant -0- Palm Beach County j) HOME -0- Other Federal Grants (list below) -0- Mainstream Voucher Program (MS5) 4,165,750 Administration and Housing/Utility Assistance payments under HUD Section 8 programs. Emergency Housing Voucher Program (EHV) 1,745,500 Administration and Housing/Utility Assistance Payments under HUD Section 8 programs. Housing Opportunities for Persons With Aids (HOPWA) 3,415,750 Administration and Tenant Based Rental Assistance Payments under HOPWA program. JOBS Plus Initiative Program \$582,500 Administration under the JOBS Plus program. 2. Prior Year Federal Grants (unobligated funds only) (list below) Replacement Housing -0- CFP 2022 715,500 Maintenance and Capital Improvements under the Capital Fund program. CFP 2023 1,607,267 Maintenance and Capital Improvements under the Capital Fund program. CFP 2022 – Safety and Security 250,000 Maintenance and Capital Improvements under the Capital Fund program. CFP 2023 – Health Hazards Grant 3,985,500 Maintenance and Capital Improvements under the Capital Fund program. Sources Planned \$ Planned Uses 3.Public Housing Dwelling Rental Income a)Rents \$1,522,800 Operation of PHA sites b)Other Tenant Charges 37,500 Operation of PHA sites c)JPEID Rents 459,250 Operation of PHA sites 4.Other income (list below) PH Reserves \$385,000 Operations of PHA sites HUD Held HCVP Reserves 970,5000 HCVP HAP PHA held HCVP Reserves 1,725,750 HCVP Administration &amp; HAP PHA held MS5 Reserves 92,000 MS5 Administration &amp; HAP HUD held MS5 Reserves 645,250 MS5 HAP PHA held EHV Reserves 45,750 EHV Administration PHA held NSP Reserves 3,500 Administration NSP Cherry Hill Lot Reserves \$2,895,750 Future Affordable Housing 5.Non-federal sources (list below) PH Non-Dwelling Income \$7,500 Operation of PHA Sites HCVP Other Income 50,000 HCVP Administration Mainstream Other Income 1,500 Mainstream Administration Emergency Housing Other Income 750 Emergency Housing Admin NSP Dwelling Rent \$87,250 Operation of NSP Sites Total Resources \$65,590,317</p> <p><b>Rent Determination.</b>  Administrative Plan - Chapters 6, 7, and 11 had to undergo a complete re-write for HOTMA ACOP Plan - Chapter 6, 7, and 9 had to undergo a complete re-write for HOTMA</p> <p><b>Operation and Management.</b>  Chapter 8 - Leasing and Inspections (ACOP Plan) This chapter has been updated for NSPIRE. this includes removal of the section on minimum heating standards, and a dramatically revised part II, which covers inspections. Chapter 8 - National Standards and for the Physical Inspection of Real Estate Rent Reasonableness Determinations (Administrative Plan) This chapter only contains minor policy adjustments to the Inspection Results section to disallow self-certification of repairs.</p> <p><b>Grievance Procedures.</b>  Chapter 16 - Informal Hearings (Administrative Plan) <input type="checkbox"/> Included the term human trafficking with Violence Against Women Act (VAWA) language, in addition to other VAWA clarifications to better align with current guidelines such as the implementation Guidance for VAWA 2022 published in the Federal Register on January 4, 2023. <input type="checkbox"/> Included changes regarding exceptions to utility allowances as a reasonable accommodation. <input type="checkbox"/> Modified the policy on evidence for the informal hearing to eliminate the charge of copying documents related to the hearing. <input type="checkbox"/> Added a record retention policy that the PHA will keep for at least three years records of all complaints, investigations, notices, and corrective actions related to fair housing violations. <input type="checkbox"/> Remote Informal Reviews</p> <p><b>Community Service and Self-Sufficiency Programs.</b>  The Palm Beach County Housing Authority Resident Services Department is a dynamic and multifaceted entity dedicated to enhancing the lives of residents and the community at-large. Here are some key components of our services: • Family Self-Sufficiency (FSS): This program empowers families by promoting education, financial independence, and self-sufficiency. Participants receive support to achieve their goals and break free from dependency. • Foster Youth to Independence (FYI): Designed for young adults transitioning out of foster care, FYI provides essential resources, guidance, and life skills training. It aims to equip them for independent living and successful futures. • Job Plus: The Job Plus program assists the residents in finding employment, enhancing job skills, and advancing their careers. By connecting individuals with job opportunities, it contributes to economic stability. • Resident Opportunities and Self-Sufficiency (ROSS): ROSS focuses on improving the quality of life for public housing and voucher program participants. It offers services such as counseling, education, and community engagement. • Youth Build: This program provides job training and educational opportunities to at-risk youth. The goal is to equip them for independence and life-long careers. Additionally, these services foster education, self-sufficiency, and independent living, ultimately benefiting the entire community. Family Self-Sufficiency (FSS) The FSS program empowers families toward economic independence and self-sufficiency. Key components include case management, supportive services, access to resources for employability and financial literacy, and the establishment of escrow funds. As family income increases, a portion of the rent increase is set aside in an escrow account, which can be used for education, homeownership, or business ventures. Currently, 117 families are actively enrolled in the FSS program, working collaboratively with FSS Coordinators to develop comprehensive five-year self-sufficiency plans. The PBCHA remains committed to fostering self-reliance and empowering families to achieve their aspirations. Foster Youth-to-Independence (FYI) PBCHA's (FYI) initiative addresses a critical need: providing housing assistance to young adults who are aging out of foster care and facing extreme risk of homelessness. The objective of this initiative is to prevent or end homelessness among young adults aged 18 to 24 who have recently left the foster care system without a home to go to. To achieve this, FYI offers housing vouchers to local public housing authorities. These vouchers enable eligible participants to secure stable housing and avoid homelessness. Currently, 30 participants are actively enrolled in the program. Of these, 23 are housed, while 7 are actively searching for housing. PBCHA will continue to increase the program enrollments and remain steadfast in supporting vulnerable youth. Job Plus Program PBCHA actively implements the Jobs Plus program at Seminole Estates and Dyson Circle Apartment. The Jobs Plus program aims to enhance income and employment outcomes for public. The U.S. Department of Housing and Urban Development's (HUD) community service and self-sufficiency requirement (CSSR) as authorized by the Quality Housing and Work Responsibility Act of 1998 mandates that each non-exempt adult household member (18 years or older) within the PBCHA's Public housing program either contribute 8 hours per month of community service or participate in an economic self-sufficiency program for 8 hours per month. The requirement also can be met with a combined 8 hours per month of community service and participation in an economic self-sufficiency program. The PBCHA has developed local policy for the administration of the CSSR for public housing residents within the ACOP.</p> <p><b>Asset Management.</b>  PBCHA may use capital fund to renovate or modernize the kitchens and bathrooms for some units.</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p> <p><b>Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</b>  See attachment C (Deconcentration Policy);</p>
<b>B.2</b>	<p><b>New Activities.</b>  (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Demolition and/or Disposition.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p>

- Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.
- Occupancy by Over-Income Families.
- Occupancy by Police Officers.
- Non-Smoking Policies.
- Project-Based Vouchers.
- Units with Approved Vacancies for Modernization.
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan

**Hope VI or Choice Neighborhoods.**

PBCHA may apply for Choice Neighborhoods Initiative (CNI) Planning and Implementation Grants when the Notice of Funds Available is published for AMP 2 or AMP 6. PBCHA may partner with local government, a nonprofit, and/or for-profit developer to serve as the lead applicant for purposes of the CNI grant. PBCHA may apply for Moving to Work (MTW) status, if eligible and should the application process open in 2024/2025.

**Mixed Finance Modernization or Development.**

Mixed Finance Modernization or Development/Demolition and/or Disposition PBCHA will continue to explore opportunities to develop, revitalize, and preserve the existing housing portfolio and increase the availability of affordable housing units throughout the County. PBCHA may continue to collaborate with or designate additional development partners such as municipalities, nonprofit organizations and/or developers, public and private developers, and consider the issuance of bonds. PBCHA and/or its subsidiary entity(s) will utilize all available and appropriate funding/financing tools and strategies including the Capital Fund Program (CFP), Mixed Finance Development, Low Income Housing Tax Credits (LIHTC), Rental Assistance Demonstration (RAD) conversions, Project Based Vouchers (PBV), Public Facilities Investment Corporation (PFIC), Community Development Block Grant (CDBG), Bonds issuance, Institutional loans and other available sources to redevelop Drexel House Apartments, Schall Landing, Seminole Estates, Dyson Circle, and its Scattered Site single-family homes. PBCHA will continue to evaluate and pursue, where feasible, the acquisition and/or development of ACC public housing units (within its Faircloth authority) as part of the overall development plan. PBCHA completed an asset repositioning assessment in FY 22. PBCHA may submit a Section 18 disposition application to HUD requesting authorization to dispose of all or some single-family homes in the scattered sites development. If approved, these units may be sold to qualified residents, a qualified or affiliated non-profit, or sold to third parties in accordance with the strategy and HUD regulations. The Florida Department of Transportation notified PBCHA of its intent to exercise its powers of eminent domain to take one whole scattered site SFH property and a partial of another scattered site SFH property. PBCHA has submitted a Special Applications Center application for approval from HUD for this disposition and shall comply with PIH - 2012-8 (PHA) Guidance for Obtaining HUD Consent for Takings of Public Housing Property by Eminent Domain. PBCHA had previously planned to demolish and/or dispose of two scattered site SFHs which were burned in fires within AMP 2. However, in light of the affordable housing shortage, PCBHA will repair and/or renovate the two fire units.

**Designated Housing for Elderly and/or Disabled Families.**

PBCHA will resubmit request to have Drexel designated as elderly.

**Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).**

PBCHA will apply for any safety and security grants that become available.

B.3	<p><b>Progress Report.</b> Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. <b>See attachment B.3</b></p>
B.4	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. <b>PBCHA'S 5-YEAR ACTION PLAN FOR 2023-2027 APPROVED: APRIL 16, 2024.</b></p>
B.5	<p><b>Most Recent Fiscal Year Audit.</b> (a) Were there any findings in the most recent FY Audit? Y <input checked="" type="checkbox"/> N <input type="checkbox"/> (b) If yes, please describe: <b>There were 5 findings in the HCV program and no findings in the HOPWA program during the fiscal year ending 2022. These findings related to Eligibility, HCV Housing Quality Standards (HQS) Enforcement and Annual Inspections, HCV Rent Reasonableness, HCV Waiting List selection and HCV Pic reporting covered under OMB Compliance Supplement. There were no findings related to the financial statements. The public housing program and Capital Fund Program were not tested. The full audit report providing detailed information regarding the Fiscal Year Audit Findings can be found on the PBCHA's website. The PBCHA applied and was approved for Extension of Certain Regulatory Waivers for the Housing Choice Voucher (including Mainstream) Program and Streamlined Review Process under Notice PIH 2022-30 to waive the application of SEMAP in its entirety due to indicators affected directly or indirectly because of the disruption to PHA operations caused by its adoption of available CARES Act waivers.</b></p>
C.	<p><b>Other Document and/or Certification Requirements.</b></p>
C.1	<p><b>Resident Advisory Board (RAB) Comments.</b> (a) Did the RAB(s) have comments to the PHA Plan? Y <input type="checkbox"/> N <input type="checkbox"/> (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. <b>RAB meeting is to be held on June 12, 2024.</b></p>
C.2	<p><b>Certification by State or Local Officials.</b> <u>Form HUD 50077-SL</u>, <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>
C.3	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b> Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan? Y <input type="checkbox"/> N <input checked="" type="checkbox"/> If yes, include Challenged Elements.</p>
C.5	<p><b>Troubled PHA.</b> (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/> (b) If yes, please describe: <b>A SEMAP Corrective Action Plan and a PBCHA Audit Corrective Action Plan (CAP) -FYE 9/30/22 exist.</b></p>

<b>D.</b>	<b>Affirmatively Furthering Fair Housing (AFFH).</b>
<b>D.1</b>	<b>Affirmatively Furthering Fair Housing (AFFH).</b> <b>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d) (5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</b>

**Form identification:** FL080-PALM BEACH COUNTY HOUSING AUTHORITY Form HUD-50075-ST (Form ID - 287) printed by Toryn Mathews-Dunlap in HUD Secure Systems/Public Housing Portal at 05/09/2024 04:45PM EST

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## Administrative Plan Revisions:

### Chapter 1 –

- Added information on the Housing Opportunity through Modernization Act (HOTMA) to the Overview and History of the Program section.
- Revised the section on Contents of the Plan to include information on project-based vouchers and policies governing special housing types.

### Chapter 2 –

- Expanded the existing policies on discrimination complaints with a new section on Discrimination Complaints., which includes guidance from Notice FHEO 2023-01.

### Chapter 3 –

- Revised various areas of the chapter to account for HOTMA changes, including the Final Rule issued February 14, 2023, Notice PIH 2023-27, and other sources of HUD guidance on the topic. This includes a new section on Restriction on Assistance Based on Assets.
- Included the term *human trafficking* with Violence Against Women Act (VAWA) language, in addition to other VAWA clarifications to better align with current guidelines such as the implementation Guidance for VAWA 2022 published in the *Federal Register* on January 4, 2023.
- Clarified language on disparate impact and discriminatory effects per the final rule dated March 31, 2023.

### Chapter 4 –

- Included the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.

### Chapter 5 –

- Included the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.

### Chapter 6 –

- This chapter was completely rewritten from the ground up to account for HOTMA changes, including the Final Rule issued February 14, 2023, Notice PIH 2023-27, and other sources of HUD guidance on the topic.
- Included also are changes regarding exceptions to utility allowances as a reasonable accommodation.

### Chapter 7 –

- As with Chapter 6, the bulk of this chapter had to undergo a complete rewrite for HOTMA. Many of the changes were required due to updates in verification requirements outlined in Notice PIH 2023-27.

### Chapter 8 –

- This chapter only contains a minor policy adjustment to the Inspection Results section to disallow self- certification of repairs.

Chapter 9 –

- Included the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.

Chapter 10 –

- Included the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.

Chapter 11 –

- As with Chapters 6 and 7, the bulk of this chapter had to undergo a complete rewrite to account for HOTMA, including the Final Rule issued February 14, 2023, Notice PIH 2023-27, and other sources of HUD guidance on the topic.

Chapter 12 –

- Revised the policy that the PHA will terminate assistance if the family has been evicted from federally assisted housing in the last five years to reduce the number of years to three.
- Included the term *human trafficking* with Violence Against Women Act (VAWA) language, in addition to other VAWA clarifications to better align with current guidelines such as the implementation Guidance for VAWA 2022 published in the *Federal Register* on January 4, 2023.

Chapter 13 –

- Revised policy in HAP Contract Term and Terminations section for clarification.
- Included the term *human trafficking* with Violence Against Women Act (VAWA) language, in addition to other minor VAWA clarifications to better align with current guidelines such as the implementation Guidance for VAWA 2022 published in the *Federal Register* on January 4, 2023.

Chapter 14 –

- Added a new subsection and accompanying policy on De Minimis Errors, plus a minor clarification to account for HOTMA changes, including the Final Rule issued February 14, 2023, Notice PIH 2023-27, and other sources of HUD guidance on the topic.

#### Chapter 15 –

- Reworked Chapter 15 to include the policies by default rather than directing to the guide. Policies are now included where relevant in the event that the PHA grants use of a special housing type as needed as a reasonable accommodation.

#### Chapter 16 –

- Included the term *human trafficking* with Violence Against Women Act (VAWA) language, in addition to other VAWA clarifications to better align with current guidelines such as the implementation Guidance for VAWA 2022 published in the *Federal Register* on January 4, 2023.
- Included changes regarding exceptions to utility allowances as a reasonable accommodation.
- Modified the policy on evidence for the informal hearing to eliminate the charge of copying documents related to the hearing.
- Added a record retention policy that the PHA will keep for at least three years records of all complaints, investigations, notices, and corrective actions related to fair housing violations.

#### Chapter 17 –

- Made minor updates to account for the *Federal Register* notice issued March 3, 2023, on subsidy layering requirements.
- Added a minor clarification on asset limitation requirements to the section on Eligibility for PBV Assistance to account for HOTMA changes.
- Included the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.

#### Chapter 18 –

- Added information and clarification to the Applicable Regulations, PBV Percentage Limitation and Unit Cap, Inspecting Units, and Continuation of Housing Assistance Payments sections to account for the most recent Rental Assistance Demonstration (RAD) notice, PIH 2023-19.
- Added a minor clarification on asset limitation requirements to the section on Eligibility for PBV Assistance to account for HOTMA changes.
- Included the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.

#### Chapter 19 –

- Added a new Part VI on Stability Vouchers.
- Revised Part II on the Foster Youth to Independence (FYI) Initiative to account for guidance set forth in Notice PIH 2023-04.

- Included the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.

Glossary –

- Updated acronyms and definitions for all cumulative changes specified above.

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## ACOP Plan Revisions:

### Chapter 1 –

- Added information to account for the implementation of the National Standards for the Physical Inspection of Real Estate (NPSIRE) to the section on the PHA's Commitment to Ethics and Service and adjusted other instances of UPCS-related language to account for NSPIRE throughout the remainder of the chapter.
- Added information on the Housing Opportunity through Modernization Act (HOTMA) to the Overview and History of the Program section.

### Chapter 3 –

- Revised various areas of the chapter to account for HOTMA changes, including the Final Rule issued February 14, 2023, Notice PIH 2023-27, and other sources of HUD guidance on the topic. This includes a new section on Restriction on Assistance Based on Assets.
- Clarified language on disparate impact and discriminatory effects per the final rule dated March 31, 2023.

### Chapter 6 –

- This chapter was completely rewritten from the ground up to account for HOTMA changes, including the Final Rule issued February 14, 2023, Notice PIH 2023-27, and other sources of HUD guidance on the topic.

### Chapter 7 –

- As with Chapter 6, had to undergo a complete rewrite for HOTMA. Many of the changes were required due to updates in verification requirements outlined in Notice PIH 2023-27. This is a completely new chapter and as such contains no redlines.

### Chapter 8 –

- This chapter has been updated for NSPIRE. This includes removal of the section on minimum heating standards, and a dramatically revised Part II, which covers inspections.

### Chapter 9 –

- As with Chapters 6 and 7, this chapter had to undergo a complete rewrite to account for HOTMA, including the Final Rule issued February 14, 2023, Notice PIH 2023-27, and other sources of HUD guidance on the topic. This is a completely new chapter and as such contains no redlines.

#### Chapter 10 –

- This chapter contains only one update to a cross-reference in Section 10-IV.D.

#### Chapter 12 –

- Revised the policy in Section 12-II B. to clarify that the family will be given 15 days to vacate the unit after receipt of written notice of a required transfer.
- Corrected a spelling error in Section 12-III.C.

#### Chapter 13 –

- Refined Section 13-II.J. on Over-Income Families to account for the guidance set forth in Notice PIH 2023-03.
- Added Exhibits 13-1 through 13-6, which are sample notices for over-income families at initial notification, 12, and 24 months, for both non-public housing over-income (NPHOI) and terminate-only options.

#### Chapter 15 –

- Added a new subsection and accompanying policy on De Minimis Errors, plus a minor clarification to account for HOTMA changes, including the Final Rule issued February 14, 2023, Notice PIH 2023-27, and other sources of HUD guidance on the topic.

#### Chapter 16 –

- Revised the policy in Section 16-III.A. to correct the term *overpayments* to say *underpayments*.
- Revised the policy in Section 16-III.B. under Late or Missed Payments to increase the number of business days the PHA will give the family to make a late payment from 10 to 14.
- Adjusted instances of UPCS-related language to account for NSPIRE throughout the chapter.

#### Glossary –

- Added new acronyms and terms to account for HOTMA and NSPIRE.

## Deconcentration Policy

### 1. Introductions

The Quality Housing and Work Responsibility Act of 1998 (QHWRA) requires that the Authority adopt policies and procedures governing the deconcentration of very low income families and income mixing as required by Section 10(a)(3)(B) of the 1937 Housing Act. To implement this requirement the Authority will compare the relative incomes of each development occupied predominantly by families with children. A development with more than 50 % of its occupants being families with children shall be considered to fall under this policy.

The goal of this policy is to create mixed-income communities and lessen the concentration of very-low income families within the Authority's public housing developments through admissions practices designed to bring higher income tenants into lower income developments and lower income tenants into higher income developments.

The Deconcentration Policy is intended to work in conjunction with the Authority's annual income targeting requirements that require that 40 % 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 % of the Area Medium Income. This income targeting requirement is separate from the Deconcentration Policy which is comparative in nature

### II. Definitions

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

**PHA-Wide Average Household Income:** The average annual income of all residents of all developments with more than 50 % of its occupants being families with children.

**Development Average Household income:** The average household income of all residents of a specific development with more than 50 % of its occupants being families with children.

**Higher Income Development:** A development where the Development Average Household Income is greater than 120 % of the PHA-Wide Average Household Income.

**Lower Income Development:** A development where the Development Average Household Income is less than 80 % of the PHA-Wide Average Household Income.

**Higher Income Family:** A family whose annual household income is greater than 120 % of the PHA-Wide Average Household Income.

**Lower Income Family: A family whose annual household income is less than 80 % of the PHA-Wide Average Household Income.**

### **111. Testing**

In order to achieve and maintain deconcentration , the Authority will calculate the PHA-Wide Average Household Income for all developments with 50 % or more of its occupants being families with children on at least an annual basis. At the same time, the Authority will calculate the Development Average Household Income for each development with 50 % or more of its occupants being families with children. The results shall be documented as follows:

- A. If the Development Average Household Income for a particular development is greater than 120 % of the PHA-Wide Average Household Income, then that development shall be identified as a High Income Development.
- B. If the Development Average Household Income for a particular development is less than 80 % of the PHA-Wide Average Household Income, then that development shall be identified as a Low-Income Development.

Testing can be more frequent if deemed necessary for effectiveness.

### **IV. Corrective Action**

Once a development has been identified as a High-Income Development or a Low-Income Development, the Authority will define and communicate specific procedures to be employed with the goal of achieving deconcentration . It is the goal of the Authority 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 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 correct a concentrated development, the Authority will, to the greatest extent possible, provide incentives to promote a Lower-Income Family to select a Higher-Income Development and to promote a Higher-Income Family to select a Lower-Income Development.

Procedures to be employed in the development of a corrective action plan may include some of the following;

- A. Incentives to select particular developments
- B. Payment Plans for deposits
- C. Flexibility in move-in dates

Since it is impossible to design a policy that will address every scenario, the Authority will, upon

**the identification of a need to deconcentrate, develop a specific action plan that will be included in the Annual Plan update.**

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### B.3 – Progress Report

Goal/Strategic Plan Item		
Goal #1.	The PBCHA will take actions to ensure the implementation of goals.	
<b>G</b>	Strategic Plan #1	Undertake new planning activities through the engagement of the Board, Staff, Residents, and External Stakeholders in FY2025. On schedule
<b>H</b>	Strategic Plan #2	Complete the strategic plan templates with the required information FY2025. Project on hold
<b>G</b>	Strategic Plan #3	Provide master schedule of strategic plan implementation timelines FY2025. On schedule
<b>G</b>	Strategic Plan #4	Develop a Strategic Planning Scoreboard monitoring and tracking revised goals and strategies for use by the Executive Director and Board FY2025. On schedule
<b>C</b>	Strategic Plan #5	Provide a PBCHA Business Plan for Sustainability. Cancel
<b>C</b>	Strategic Plan #6	Complete a Board Policies Manual. Cancel
<b>H</b>	Strategic Plan #7	Utilize Scorecard to assess planning implementation and overall agency progress.
Goal #2.	The PBCHA will bring clarity to its public image and agency profile through an expanded marketing and promotion of its new vision, mission, values, and goals, and will express how these initiatives will improve the quality of life in Palm Beach County.	
<input checked="" type="checkbox"/>	Strategic Plan #1	Form an Ad Hoc Marketing Committee comprised of Board, Staff, and the marketing consulting firm. Complete
<b>Y</b>	Strategic Plan #2	Update and expand the website to provide transparency on the agency mission, programs, staff, portfolio, and plan. Activity Slippage Not Impacting Completion Date
<b>C</b>	Strategic Plan #3	Prepare a PowerPoint presentation that “tells the story” of PBCHA and its residents and develop TV Show to air on Channel 20. Cancel
<b>Y</b>	Strategic Plan #4	Complete a comprehensive Customer Satisfaction Survey to determine satisfaction levels, wants and needs. Activity Slippage Not Impacting Completion Date
<input checked="" type="checkbox"/>	Strategic Plan #5	Develop a marketing culture, and employee marketing expectations. Complete
Goal #3.	Human Resources Planning: The PBCHA will evaluate and refine staffing to meet the ongoing needs of the agency.	
<b>C</b>	Strategic Plan #1	Provide transparency and clarity on the PBCHA organization of its human resources. Cancel
<b>Y</b>	Strategic Plan #2	Review and update the human resources instruments and benefits. Activity Slippage Not Impacting Completion Date
<input checked="" type="checkbox"/>	Strategic Plan #3	Complete a comprehensive organizational assessment of the PBCHA. Complete
<b>G</b>	Strategic Plan #4	Provide effective advancement and training opportunities for professional growth. On schedule
<input checked="" type="checkbox"/>	Strategic Plan #5	Provide for the continuity of operations during a natural or man-made disaster impacting on the office or residences. Complete

<b>Goal/Strategic Plan Item</b>		
<b>Goal #4.</b>	County Stakeholders Engagement: The PBCHA will significantly expand its engagement with governmental, non-profit, for-profit, and foundation partners that share the vision, mission, and values of the agency.	
<b>G</b>	Strategic Plan #1	Engage PBCHA in key affordable housing planning processes in the County that will impact funding priorities. On schedule
<input checked="" type="checkbox"/>	Strategic Plan #2	Prepare a PowerPoint overview on PBCHA that can be presented by Board, Staff, and Residents to key stakeholders. Complete
<input checked="" type="checkbox"/>	Strategic Plan #3	Complete Memorandum of Agreement with many of the key support services providers in Palm Beach County. Complete
<input checked="" type="checkbox"/>	Strategic Plan #4	Provide for E-Communications that will offer an additional option for marketing PBCHA programs and services. Complete
<b>Y</b>	Strategic Plan #5	Consider business model options for collaborating with other housing authorities in Palm Beach County. Activity Slippage Not Impacting Completion Date
<b>Goal #5.</b>	Support Services Linkages: The PBCHA will strengthen, and in some cases, formalize additional partnership agreements with key partners in Palm Beach County that can provide critical self-sufficiency and independent living support services.	
<b>G</b>	Strategic Plan #1	Identify and profile the current support service providers that are providing assistance to PBCHA residents. On schedule
<b>Y</b>	Strategic Plan #2	Identify and profile support service providers not currently assisting PBCHA residents. Activity Slippage Not Impacting Completion Date
<input checked="" type="checkbox"/>	Strategic Plan #3	Apply for Resident Opportunity and Self-Sufficiency (ROSS) Grant. Complete
<b>G</b>	Strategic Plan #4	Define communication linkages between providers, staff, and residents to monitor and evaluate support services. On schedule
<b>G</b>	Strategic Plan #5	Implement some support services on-site in PBCHA developments. On schedule
<b>G</b>	Strategic Plan #6	Redefine the self-sufficiency and independent living goals, strategic plans, and processes. On schedule
<b>C</b>	Strategic Plan #7	Provide opportunities for resident-managed business services that support housing authority needs. Cancel
<b>G</b>	Strategic Plan #8	Provide information on FSS program progress. On schedule
<b>Y</b>	Strategic Plan #9	Increase opportunities for Section 3 residents. Activity Slippage Not Impacting Completion Date
<b>Goal #6.</b>	Housing Tenancy: The PBCHA will strive to reduce the length of tenancy for Public Housing residents and Housing Choice Voucher participants. The Housing Authority will posture themselves to be able to provide greater opportunities and motivation for residents to transition into market rate housing.	
<b>G</b>	Strategic Plan #1	Formulate baseline information on tenancy lengths and track such information for future residents. Activity Slippage Not Impacting Completion Date
<b>H</b>	Strategic Plan #2	Restructure the family self-sufficiency program and services to be more effective and efficient. Project on hold
<b>H</b>	Strategic Plan #3	Provide briefing materials for residents that set high expectations on housing tenancy transition. Project on hold

<b>Goal/Strategic Plan Item</b>		
<b>H</b>	Strategic Plan #4	Revise the Administrative Plan and the ACOP to maximize opportunities for success in housing tenancy length reduction. Project on hold
<b>H</b>	Strategic Plan #5	Build a collaborative network with governmental housing inspectors to better monitor and enforce landlord and resident lease expectations. Project on hold
Goal #7.	Portfolio Expansion: The PBCHA will launch multiple portfolio expansion development to respond to the affordable housing needs that are evidenced in Palm Beach County.	
<input checked="" type="checkbox"/>	Strategic Plan #1	Complete a comprehensive portfolio analysis of property value, finances, and physical condition. Complete
<b>Y</b>	Strategic Plan #2	Form a Board Development Committee, Staff, and local development experts to review portfolio maintenance and expansion. Activity Slippage Not Impacting Completion Date
<b>G</b>	Strategic Plan #3	Expand the agency engagement at the County level impacting affordable housing planning and implementation. On schedule
<b>Y</b>	Strategic Plan #4	Ensure that all existing and future housing developments are linked to sustainable neighborhoods. Activity Slippage Not Impacting Completion Date
<b>G</b>	Strategic Plan #5	Utilize business models for evaluating the viability of existing and future developments. On schedule
<b>G</b>	Strategic Plan #6	Identify and pursue grants and funds leveraging opportunities that will expand affordable housing. On schedule

***On Schedule***

***Activity Slippage Not Impacting Completion Date***

***Activity Slippage Impacting Completion Date***

***Project on Hold***

***Complete***

***Cancel***

<b>G</b>
<b>Y</b>
<b>R</b>
<b>H</b>
<input checked="" type="checkbox"/>
<b>C</b>



**B.1 - New Activities****Hope VI or Choice Neighborhoods**

PBCHA may apply for Choice Neighborhoods Initiative (CNI) Planning and Implementation Grants when the Notice of Funds Available is published for AMP 2 or AMP 6. PBCHA may partner with local government, a nonprofit, and/or for-profit developer to serve as the lead applicant for purposes of the CNI grant.

PBCHA may apply for Moving to Work (MTW) status, if eligible and should the application process open in 2024/2025.

**Mixed Finance Modernization or Development/Demolition and/or Disposition**

PBCHA will continue to explore opportunities to develop, revitalize, and preserve its existing housing portfolio and increase the availability of affordable housing units throughout the County. PBCHA may continue to collaborate with or designate additional development partners such as municipalities, nonprofit organizations and/or developers, public and private developers, and consider the issuance of bonds. PBCHA and/or its subsidiary entity(s) will utilize all available and appropriate funding/financing tools and strategies including the Capital Fund Program (CFP), Mixed Finance Development, Low Income Housing Tax Credits (LIHTC), Rental Assistance Demonstration (RAD) conversions, Project Based Vouchers (PBV), Public Facilities Investment Corporation (PFIC), Community Development Block Grant (CDBG), Bonds issuance, Institutional loans and other available sources to redevelop Drexel House Apartments, Schall Landing, Seminole Estates, Dyson Circle, and its Scattered Site single-family homes. PBCHA will continue to evaluate and pursue, where feasible, the acquisition and/or development of ACC public housing units (within its Faircloth authority) as part of the overall development plan.

PBCHA completed an asset repositioning assessment in FY 22. PBCHA may submit a Section 18 disposition application to HUD requesting authorization to dispose of all or some of its 42 single-family homes in the scattered sites development. If approved, these units may be sold to qualified residents, a qualified or affiliated non-profit, or sold to third parties in accordance with PBCHA's Guiding Principles for Development and HUD regulations.

The Florida Department of Transportation notified PBCHA of its intent to exercise its powers of eminent domain to acquire one (1) of the scattered site SFH properties, Parcel 102 located at 2021 NW 2<sup>nd</sup> St, Boynton Beach, FL. 33435, and a partial lot of another scattered site SFH property, Parcel 114 located at 2231 NW 2<sup>nd</sup> St, Boynton Beach, FL. 33435. PBCHA has submitted a Special Applications Center (SAC) application for approval from HUD for this disposition and shall comply with PIH - 2012-8 (PHA) Guidance for Obtaining HUD Consent for Takings of Public Housing Property by Eminent Domain.

PBCHA had previously planned to demolish and/or dispose of two scattered site SFHs, 402 NW 16<sup>th</sup> Ave, Boynton Beach, FL. 33435 and 2750 NE 4<sup>th</sup> Street, Boynton Beach, FL. 33435, which were burned in fires within AMP 2. However, in light of the affordable housing shortage, PCBHA will repair and/or renovate the two fire units.

### Designated Housing for Elderly and/or Disabled Families

The Palm Beach County Housing Authority (PBCHA) plans to designate certain public housing for occupancy only by elderly families as provided by Section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) in the upcoming fiscal year. PBCHA has operated certain public housing units as such, restricting occupancy to residents who are elderly only.

<b>Designation of Public Housing Activity Description</b>
1a. Development name: Drexel Apartments
1b. Development (project) number: <b>FL0800000002</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> 100 Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/> 100
4. Date this designation approved, submitted, or <b>planned for submission</b> : 2024
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously approved Designation Plan
6. Number of units affected: <input checked="" type="checkbox"/> 100 7. Coverage of action (select one) Part of the development <input checked="" type="checkbox"/> Total development

### Conversion of Public Housing to Tenant-Based Assistance

PBCHA will continue to analyze units in its portfolio to be converted where the conversion to project or tenant-based vouchers is economically beneficial and will increase housing opportunities. PBCHA's approach may include seeking additional funding authority in the voucher program to increase project-based opportunities at elderly and family public housing communities. PBCHA may also elect to utilize Low-Income Housing Tax Credit (LIHTC) equity and other resources to facilitate the conversion of the below-mentioned developments.

PBCHA may choose to utilize this option for Drexel Apartments, Schall Landing, Seminole Estates, Scattered Sites, and Dyson Circle.

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As a result of the asset repositioning assessment completed in FY 22, PBCHA may consider converting a portion of its Public Housing inventory to RAD and is currently studying the potential benefits of conversion for some or all its Public Housing properties. Where the PBCHA proposes to convert some or all of its public housing properties under the Rental Assistance Demonstration (RAD) , the PBCHA will comply with all program instructions in Notice H-2023-08 PIH-2023-19 (HA) Rental Assistance Demonstration – Supplemental Notice 4B and/or subsequent notices/revisions. The PBCHA will submit a RAD-Specific PHA Plan and/or Significant Amendment to its Annual Plan submission in accordance with 24 CFR Part 903.

Below, you will find specific information related to the Public Housing Development(s) that may be selected for RAD:

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**PBV:****Development #1**

Name of Public <u>Housing Development:</u>	PIC Development ID:	Conversion Type:	Transfer of Assistance:
1. Drexel Apartments	FL080000002	<b>PBV</b>	100
Total Units:  100	Pre-RAD Units:  Senior	Post- RAD Unit Type:  Senior	2024 Capital Fund Allocation for Development: (TBD)
Bedroom Type:  One Bedroom:	Number of Units Pre- Conversion:  100	Number of Units Post Conversion:  140	Change in Number of Units per bedroom type and Why:  None
Complete			

**Development #2**

Name of Public <u>Housing Development:</u>	PIC Development ID:	Conversion Type:	Transfer of Assistance:
2. Schall Landing	FL080000002	PBV	76
Total Units:  76	Pre-RAD Units:  Family	Post- RAD Unit <u>Type:</u>  Family	2024 Capital Fund Allocation for Development: (TBD)
Bedroom Type:  Efficiency: One Bedroom: Two Bedroom: Three Bedroom: Four Bedroom:	Number of Units Pre- Conversion:  5 34 27 10	Number of Units Post Conversion:  130	Change in Number of Units per bedroom type and Why:  Not Determined
Complete			

**Development #3**

Name of Public <u>Housing Development:</u>	PIC Development ID:	Conversion Type:	Transfer of Assistance:
3. Seminole Estates	FL080000002	PBV	76
Total Units:	Pre-RAD Units:	Post- RAD Unit <u>Type:</u>	2024 Capital Fund Allocation for
76	Family	Family	Development: (TBD)
Bedroom Type:	Number of Units Pre- Conversion:	Number of Units Post Conversion:	Change in Number of Units per bedroom type and Why:
Efficiency:			
One Bedroom:	5	141	
Two Bedroom:	34		
Three Bedroom:	27		
Four Bedroom:	10		
Complete			Not Determined

**Development #4**

Name of Public <u>Housing Development:</u>	PIC Development ID:	Conversion Type:	Transfer of Assistance:
4. Scattered Sites	FL080000002	PBV	42
Total Units:	Pre-RAD Units:	Post- RAD Unit <u>Type:</u>	2024 Capital Fund Allocation for
42	Family	Family	Development: (TBD)
Bedroom Type:	Number of Units Pre- Conversion:	Number of Units Post Conversion:	Change in Number of Units per bedroom type and Why:
Efficiency:			
One Bedroom:	0	42	
Two Bedroom:	6		
Three Bedroom:	26		
Four Bedroom:	10		
Complete			Not Determined

**Development #5**

Name of Public <u>Housing Development:</u> 5. Dyson Circle	PIC Development ID:  FL080000006	Conversion Type:  PBV	Transfer of Assistance:  134
Total Units:  134	Pre-RAD Units:  Family	Post- RAD Unit <u>Type:</u>  Family	2024 Capital Fund Allocation for Development: (TBD)
Bedroom Type:  Efficiency: One Bedroom: Two Bedroom: Three Bedroom: Four Bedroom: Five Bedroom:	Number of Units Pre- Conversion:  50 12 30 36 6	Number of Units Post Conversion:  300	Change in Number of Units per bedroom type and Why:       Not Determined
Complete			

### Significant Amendment Definition

As part of the Rental Assistance Demonstration (RAD), PBCHA is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds; Changes to the construction and rehabilitation plan for each approved RAD conversion; and Changes to the financing structure for each approved RAD conversion.

### Project-Based Vouchers

The project-based voucher (PBV) program allows PHAs that already administer a tenant-based voucher program under an annual contributions contract (ACC) with HUD to take up to 20 percent of its voucher program budget authority and attach the funding to specific units rather than using it for tenant-based assistance (24 CFR 983.6). PHAs may only operate a PBV program if doing so is consistent with the PHA's Annual Plan, and the goal of deconcentrating poverty and expanding housing and economic opportunities [42 U.S.C. 1437f(o)(13)].

The Authority may operate a project-based voucher program that utilizes up to 639 vouchers (based on 20% of its voucher authority). The PBCHA is also allowed to project base an additional 319 vouchers (based on 10% of its voucher authority) for eligible exception categories for a total of 958 possible PBVs. PBCHA has 614 vouchers under Housing Assistance Payment (HAP) contracts as reflected below:

<u>Development Name</u>	<u>Development Address</u>	<u>Units under HAP</u>
Westgate Plaza Apartments	4150 Westgate Ave., WPB, FL	80
33409		
Quiet Waters	306 SW 10th St., Belle Glade, FL	93
33430		
Covenant Villas	600 Covenant Dr, Belle Glade, FL	116
33430		
New South Bay Villas	845 Palm Beach Lakes Rd., South Bay, FL	130
Lake Worth Towers	1500 Lucerne Ave., Lake Worth, FL. 33460	195

614



PBCHA may decide to project-based vouchers above its voucher limit, if HUD publishes a notice making available PBV for HUD-VASH vouchers or other PBV special purpose vouchers or for a project that would provide affordable housing for low-income or homeless veterans or other eligible targeted populations.

PBV assistance may be attached to existing housing or newly constructed or rehabilitated housing [24 CFR 983.52]. If PBV units are already selected for project-based assistance either under an agreement to enter into HAP Contract (AHAP) or a HAP contract, the PHA is not required to reduce the number of these units if the amount of budget authority is subsequently reduced. However, the PHA is responsible for determining the amount of budget authority that is available for project-based vouchers and ensuring that the amount of assistance that is attached to units is within the amounts available under the ACC, regardless of whether the PHA has vouchers available for project-basing [FR Notice 3/13/23].

**Additional Project-Based Units [FR Notice 1/18/17; Notice PIH 2017-21 and FR Notice 1/24/22]** The PHA may project-base an additional 10 percent of its units above the 20 percent program limit. The units may be distributed among one, all, or a combination of the categories as long as the total number of units does not exceed the 10 percent cap. Units qualify under this exception if the units:

- Are specifically made available to house individuals and families that meet the definition of homeless under section 103 of the McKinney Vento Homeless Assistance Act (42 U.S.C.11302) and contained in the Continuum of Care Interim Rule at 24 CFR 578.3.
- Are specifically made available to house families that are comprised of or include a veteran. - Veteran means an individual who has served in the United States Armed Forces.
- Provide supportive housing to persons with disabilities or elderly persons as defined in 24 CFR 5.403.
- Are located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five Year Estimates.

#### PHA Policy

The Authority plans to use some of its vouchers under the "Project Based Vouchers" ("PBV") option, as described at 24 CFR Part 983.51(b), as follows:

- PBCHA may solicit proposals by using a Request for Proposals (RFP) to select proposals on a competitive basis in response to the PHA request. The PHA may not limit proposals to a single site or impose restrictions that explicitly or practically preclude owner submission of proposals for PBV housing on different sites. The criteria and procedures for such selections will be described in the RFP and in the PBCHA's HCVP (Section 8) Administrative Plan.
- The PBCHA may select proposals that were previously selected based on a competition. This may include selection of a proposal for housing assisted under a federal, state, or local government housing assistance program that was subject to a competition in accordance with the requirements of the applicable program, community development program, or supportive services program that requires competitive selection of proposals (e.g., HOME, and units for which competitively awarded LIHTCs have been provided), where the proposal has been selected in accordance with such program's competitive selection requirements within three years of the PBV proposal selection date, and the earlier competitive selection proposal did not involve any consideration that the project would receive PBV assistance. The PBCHA need not conduct another competition.

For certain public housing projects where the PBCHA has an ownership interest or control and will spend a minimum amount per unit on rehabilitation or construction, the PBCHA may select a project to attach PBVs

without following one of the two processes above, in accordance with HOTMA. The use of PBVs is consistent with the overall PHA Plan, which encourages the development of affordable mixed-use, mixed-income housing particularly in consort with broader neighborhood revitalization efforts in projects throughout the County.

**Solicitation and Selection of PBV Proposals (24 CFR 983.51(c))**

PBCHA's PBV criteria and selection procedures will propose the use of these resources in ways that facilitate achievement of its overall housing goals in general and the mobilization of potential relocation resources in particular, to address the housing needs of PBCHA families at developments slated to be developed or redeveloped throughout the County.

PHA procedures for selecting PBV proposals shall be designed and operated to provide broad public notice of the opportunity to offer PBV proposals for consideration by the PHA. The public notice procedures may include publication of the public notice in a local newspaper of general circulation and other means designed and actually operated to provide broad public notice. The public notice of the PHA request for PBV proposals must specify the submission deadline. Detailed application and selection information must be provided at the request of interested parties. For the entire policy on project-based vouchers, please refer to the Section 8 Administrative Plan, Chapter 17, located on the PBCHA website: [www.pbchafll.org](http://www.pbchafll.org).

Under the HUD Asset Management Model, some of PBCHA's developments may not be financially sustainable because insufficient Annual Contract Contribution (ACC) subsidy is received from HUD to support their operations. PBCHA is currently evaluating options for restructuring the properties; possibly seeking to convert these properties to project-based Section 8 communities.

**Units with Approved Vacancies for Modernization**

Periodically, a public housing unit may be vacated for repairs due to a fire or other extensive damage. Units may also be vacated for modernization. In these cases, proper approval will be obtained from HUD.

**Other Capital Grant Programs** (i.e., Capital Fund, Community Facilities Grants or Emergency Safety and Security Grants)

PBCHA may consider submission of applications, where feasible, for the CFP Safety and Security Grant Program, Lead Based Paint Capital Fund Program, and Housing-related Hazard Capital Fund Program. As funds become available, PBCHA intends to explore all funding opportunities for additional capital fund monies and seek additional revenue sources as well as utilize available programs to address the severe backlog of unfunded capital needs of the public housing portfolio and ensure the long-term preservation of affordable housing in the Palm Beach County.

**Property Management**

PBCHA and/or its affiliate plans to engage in providing property management services for its related entities and/or third parties. These services shall include all aspects of the day-to-day operations of property management, including but not limited to screening and selecting tenants, completing lease forms, rent collections, repairs and maintenance, ensuring compliance with LIHTC, HOME, SHIP, HOPWA and/or other state or federally funded programs used in financing properties and preparing reports of operations for owners. PBCHA intends to engage owners of Low-Income Housing Tax Credit properties (including entities which may be partially owned or managed by PBCHA and/or its affiliate), properties owned by other Housing Authorities, municipalities, and private owners. PBCHA shall utilize compliance firms as necessary to assist with adherence to compliance for properties funded with LIHTC, HOME, SHIP, HOPWA or other funding sources with compliance requirements. The properly licensed staff has been or will be hired. PBCHA has or will obtain the appropriate state required licensing.

**B.4 Capital Improvements**

PBCHA'S 5-YEAR PLAN	APPROVED: FEBRUARY 3, 2023
CFG FY 2023     \$1,602,221	
CFG FY 2024     \$1,600,000 (estimate)	
CFG FY 2025     \$1,000,000 (estimate}	
CFG FY 2026     \$1,000,000 (estimate)	
CFG FY 2027     \$1,000,000 (estimate)	

Total

\$6,202,221

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## **Substantial Deviation - Significant Amendment/Modification**

PBCHA is required to provide its definition of "Substantial Deviation" or "Significant Amendment/Modification" and the basic criteria that it will use for determination. A Substantial Deviation from the Five-Year Plan is an overall change in the direction of the Housing Authority (HA) pertaining to its goals and objectives. The Palm Beach County Housing Authority will consider the following actions as a Substantial Deviation:

1. Results in reallocation of more than \$250,000 in agency funds;
2. An addition of new work items (excludes emergency work) not included in the Capital Fund Program (CFP) 5-Year Action Plan or Annual Statement(s) exceeding a cumulative amount of \$250,000 under the current fiscal year, or changes in use of the replacement reserves under the CFP.
3. Demolition and/or disposition activities, new or amended development plans, designation or conversion actions not currently identified in the 5-Year Plan or Annual Plan, or otherwise mandated by HUD.
4. Would create a mission, goal or objective that would fundamentally change the existing mission, goals, objectives or plans already identified by the Authority and would require formal approval of the Board of Commissioners;
5. Is a clear change in direction of funds mentioned above, exclusive of strategies that modifies agreed upon improvements to physical assets of the LIPH program outside of reductions in HUD funding or reallocations to future years;
6. In the event a federal statutory or regulatory change is made effective and in the opinion of the Authority, has either substantial programmatic or financial effects on the programs administered by the Authority; or
7. Creates substantial obligations or administrative burdens on the programs under administration at the start of the plan year. Such changes which are mandated and/or required may be adopted without prior notice to remain in compliance.

New program activities required or adopted to reflect changes in HUD regulations or as a result of a declared national or local emergency are exempt actions. In such cases, the administrative/ programmatic changes implemented will not be considered as a significant amendment or Modification to the Five-Year and Annual Plan.

As part of the Rental Assistance Demonstration (RAD), PBCHA is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

- a. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;
- b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds.
- c. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- d. Changes to the financing structure for each approved RAD conversion.