



Housing Authority of the
County of Alameda

22941 Atherton Street, Hayward, CA 94541

Tel. 510.538.8876 TDD 510.727.8551 Fax 510.537.8236 www.haca.net

HOUSING COMMISSION AGENDA

Special Meeting: July 26, 2017

Time: 8:00 a.m.

HACA Board Room, 22941 Atherton Street, Hayward, CA 94541

The public is welcome at all Housing Commission meetings. If you wish to speak on a matter NOT on the Agenda, please file a Public Comment card with the Commission Clerk. Upon recognition by the Chairperson during Public Comment, state your name, comments and/or questions. Anyone wishing to address the Commission on an agenda item or on business introduced by the Housing Commission may do so when the Chairperson calls for comments on the agenda item. Please be brief and limit your comments to the specific subject under discussion. NOTE: Only matters within the Housing Commission's jurisdiction may be addressed.

To allow the opportunity for all to speak, a time limit of 3 minutes has been set for public speakers wishing to address the Housing Commission. The Chairperson has the discretion to further limit this time if warranted by the number of speakers.

The Housing Commission Secretary of the Housing Authority of the County of Alameda has, on Thursday, July 20, 2017 duly distributed this Agenda to the Clerk of the Board of Supervisors for posting in the office of the Alameda County Administration Building and has posted it on the bulletin board of the Housing Authority of the County of Alameda.

AMERICANS WITH DISABILITIES: In compliance with the Americans with Disabilities Act, if special assistance to participate in this meeting is needed, please contact the Housing Authority office at (510) 727-8511. Notification at least 48 hours prior to the meeting will enable the Housing Authority to make reasonable arrangements.

1. CALL TO ORDER / ROLL CALL		
2. CLOSED SESSION		
<i>Contract Negotiations with SEIU Local 1021 and the Housing Authority of the County of Alameda</i>		
<i>Labor Negotiations Pursuant to Government Code 54957.6</i>		
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HOUSING COMMISSION AGENDA (CONTINUED)

Special Meeting: July 26, 2017

Time: 8:00 a.m.

HACA Board Room, 22941 Atherton Street, Hayward, CA 94541

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ELECTION OF OFFICERS

July 26, 2017

HOUSING AUTHORITY OF THE COUNTY OF ALAMEDA

AGENDA STATEMENT

Meeting Date: July 26, 2017

Subject:	Election of Officers
Exhibits Attached:	None
Recommendation:	Elect Officers to the Chairperson and Vice Chairperson Positions for FY 2017-2018

DISCUSSION

In accordance with the Housing Commission's bylaws, your Commission must elect, by a majority vote, a Chairperson and Vice-Chairperson for a term of one (1) year. At the June meeting, your Commission appointed Commissioners Gacoscas, Gerry and Hannon as the Nominating Committee.

The Nominating Committee will formally present the candidates that it recommends for the Chairperson and Vice-Chairperson positions and an election will be held. The newly-elected officers will take their seats immediately and the newly-elected Chairperson will chair the meeting.

MINUTES

June 14, 2017



Housing Authority of the
County of Alameda

HACA AGENDA ITEM NO.: 4.

22941 Atherton Street, Hayward, CA 94541

Tel. 510.538.8876 TDD 510.727.8551 Fax 510.537.8236 www.haca.net

**HOUSING COMMISSION MINUTES
REGULAR MEETING: JUNE 14, 2017
HACA BOARD ROOM, 22941 ATHERTON STREET, HAYWARD, CA 94541**

SUMMARY ACTION MINUTES

1. CALL TO ORDER/ROLL CALL

Call to Order

Chairperson Gacoscos called the meeting to order at 8:03 a.m.

Roll Call

Present: Cmr. Ballew, Biddle, Buckholz, Gacoscos, Gerry, Hannon, Patz, and Peixoto

Entered After Roll Call: Cmr. Maass

Excused: Cmr. Steiner

2. CLOSED SESSION

*Contract Negotiations with SEIU Local 1021 and the Housing Authority of the County of Alameda
Labor Negotiations Pursuant to Government Code 54957.6*

The Housing Commission entered into a closed session at 8:04 a.m. and reconvened in open session at 8:31 a.m. Chairperson Gacoscos reported that no reportable actions were taken in the closed session.

3. ACTION: APPROVAL OF THE MINUTES OF THE MAY 10, 2017 HOUSING COMMISSION MEETING

Recommendation: Approve the minutes of the May 10, 2017 Housing Commission meeting as presented.

Motion/Second: Biddle/Buckholz.

Ayes: All. Motion passed. **APPROVED AS RECOMMENDED.**

4. PUBLIC COMMENT – ON MATTERS NOT ON THE AGENDA

Warren Kushman, a member of the public, expressed his concerns over the federal government's proposed reductions to funding for the U.S. Department of Housing and Urban Development.

5. NEW BUSINESS

5-1. RESOLUTION NO. 06-17: CONTRIBUTION TO THE ALAMEDA COUNTY EMPLOYEES' RETIREMENT ASSOCIATION (ACERA) FOR THE 2017-2018 FISCAL YEAR

Cathy Leoncio, Finance Director, presented the staff report. Ms. Leoncio reported that the contribution to the Alameda County Employees' Retirement Association (ACERA) to fund HACA's 401(h) subaccount for the fiscal year beginning July 1, 2017 is \$227,800.36.

Recommendation: Adopt Resolution No. 06-17 approving a contribution in the amount of \$227,800.36 to the Alameda County Employees' Retirement Association (ACERA) to fund HACA's 401(h) subaccount for the fiscal year beginning July 1, 2017.

Commission Discussion: Cmr. Peixoto and Ms. Leoncio discussed what the contribution to HACA's 401(h) subaccount will fund.

Motion/Second: Biddle/Peixoto.

Ayes: All. Motion passed. **APPROVED AS RECOMMENDED.**

5-2. RESOLUTION NO. 07-17: APPROVING THE OPERATING BUDGET AND BUDGETED POSITIONS FOR THE JULY 1, 2017 – JUNE 30, 2018 FISCAL YEAR

Cathy Leoncio, Finance Director, presented the staff report. Ms. Leoncio summarized the income and expenses in the proposed budget for the July 1, 2017 – June 30, 2018 fiscal year. She described the factors that were considered in forming the budget projections and discussed the impact that the shortfall in HUD's funding will have on HACA's budget deficit.

Christine Gouig, Executive Director, explained why the formula that HUD uses to calculate HACA's funding proration is problematic and gave a brief update on the status of the president's proposed federal budget.

Ms. Leoncio stated for the record that there was an error in the chart on page 24 of the Housing Commission agenda packet and a corrected chart was distributed to the Housing Commission and to the public.

Recommendation: Adopt Resolution No. 07-17 approving the operating budget and budgeted positions for the July 1, 2017 – June 30, 2018 fiscal year.

Commission Discussion: Cmr. Hannon commented that Ms. Leoncio provided an excellent report. He recommended that future reports include the dollar amounts of the cost savings that are realized from positions that are left vacant. Cmr. Hannon also suggested that staff consider setting a formal policy for the use of funds for HACA-owned properties and Ms. Gouig agreed. She commented that reserves for the properties are necessary to fund repairs and capital improvements now and in the future. Cmr. Ballew recommended that staff report on the impact that keeping a position vacant has on HACA's service. He further commented that if federal funding reductions are going to be the new normal, HACA must explore alternative sources of funding. Cmr. Gerry commented that the Budget/Audit/Negotiations committee discussed the human costs in its last meeting. Cmr. Biddle and Ms. Gouig discussed the HUD funding shortfall and Housing Assistance Payments.

Motion/Second: Peixoto/Biddle.

Ayes: All. Motion passed. **APPROVED AS RECOMMENDED.**

5-3. RESOLUTION NO. 08-17: HUD FUNDING SHORTFALL – UPDATE ON ACTION PLAN AND AUTHORIZATION TO SUBMIT SHORTFALL FUNDING APPLICATION

Christine Gouig gave a brief introduction. She reported that staff meets monthly with HUD's Shortfall Team and described some of the critical items that are discussed in the meetings. Jennifer Cado, Senior Administrative Analyst, summarized the action items on HACA's Shortfall Action Plan and provided the status of these items. She reported that staff is waiting for HUD to publish the notice that will allow HACA to apply for Shortfall funding. Ms. Cado recommended that the Commission adopt Resolution No. 08-17 authorizing staff to submit the Shortfall funding application to HUD in the event that HUD publishes this notice before the next Housing Commission meeting.

Recommendation: Adopt Resolution No. 08-17 authorizing submittal of an application to the U.S. Department of Housing and Urban Development for Shortfall funding.

Commission Discussion: Cmr. Peixoto asked if the Shortfall funding can be used for administrative fees and Ms. Cado explained that Shortfall funding can only be used for Housing Assistance Payments (HAP). Cmr. Buckholz and Ms. Cado discussed surrendered vouchers and repayment agreements. They also discussed how vouchers are used for shared housing.

Motion/Second: Biddle/Hannon.

Ayes: All. Motion passed. **APPROVED AS RECOMMENDED.**

5-4. ACTION: REVISIONS TO HACA'S SECTION 8 ADMINISTRATIVE PLAN

Jennifer Cado, Senior Administrative Analyst, presented the staff report. Ms. Cado reported that staff is proposing to amend HACA's Section 8 Administrative Plan (Admin Plan) in order to incorporate updates to HACA's Code of Conduct, clarify language related to the Section Eight Management Assessment Program (SEMAP), and add updates from HUD with regard to the Violence Against Women Act (VAWA). Ms. Cado recommended that the Housing Commission approve the proposed amendments to HACA's Admin Plan.

Recommendation: Approve the proposed revisions to HACA's Administrative Plan as presented.

Commission Discussion: Cmr. Biddle commented that HUD seems to be issuing new updates to the Admin Plan regularly. Ms. Cado indicated that there is no set schedule for these updates but that staff will continue to amend the Admin Plan as needed. Cmr. Buckholz and Ms. Cado discussed what can happen with a person's Section 8 voucher if a Section 8 participant must flee their unit due to domestic violence. Cmr. Maass and Ms. Gouig discussed some of the speculation regarding the elimination of federal regulations under the new federal administration. Cmr. Gacoscas and Ms. Cado talked about the number of VAWA cases HACA has handled. Cmr. Buckholz and Ms. Cado discussed elder abuse. Ms. Cado stated that HACA provides resources and information to families about domestic violence.

Motion/Second: Biddle/Buckholz.

Ayes: All. Motion passed. **APPROVED AS RECOMMENDED.**

5-5. ACTION: HACA SCHOLARSHIP PROGRAM AWARDS

Daniel Taylor, Special Programs Manager, presented the staff report. Mr. Taylor thanked Commissioners Buckholz, Gacoscas and Hannon for serving on the 2017 HACA Scholarship Committee. He reported that the Scholarship Committee reviewed 18 applications, held a meeting via phone on June 7 to discuss its selections and recommended that 17 applicants receive scholarship awards. Mr. Taylor also reported that the Scholarship Committee is recommending implementation of an additional award category for graduate programs to be effective with the 2018 HACA Scholarship program.

Recommendation: Approve the 2017 HACA Scholarship awards and the addition of an award category for graduate programs.

Commission Discussion: Cmr. Hannon commented that he enjoyed his participation on the Scholarship Committee and that the applications were excellent. He also commented that it was interesting to see that there were a few applicants who were older adults returning to school. He thanked Mr. Taylor and Melissa Taesali, Executive Assistant, for their work. Cmr. Buckholz and Mr. Taylor discussed the proposed award category for graduate programs. Ms. Gouig commented

that she is pleased the Scholarship Committee is proposing to add this new award category since graduate programs are expensive and there aren't many funding opportunities for graduate students. Cmr. Gacoscos and Mr. Taylor talked about the Committee's recommendation to forward an applicant's information to the National Association of Housing and Redevelopment Officials (NAHRO) scholarship program. Cmr. Buckholz and Mr. Taylor discussed the importance of the personal essay in the scholarship application. Mr. Taylor thanked the Scholarship Committee for its work.

Motion/Second: Biddle/Second.

Ayes: All. Motion passed. **APPROVED AS RECOMMENDED.**

5-6. ACTION: NOMINATING COMMITTEE FOR OFFICERS

Christine Gouig presented the staff report. After a brief discussion, Cmr. Gacoscos, Gerry and Hannon agreed to serve as the Nominating Committee to recommend candidates for the positions of Chairperson and Vice Chairperson.

Recommendation: Appoint Cmr. Gacoscos, Cmr. Gerry and Cmr. Hannon to the Nominating Committee for the FY2017-2018 Housing Commission Chairperson and Vice Chairperson positions.

Motion/Second: Biddle/Gerry.

Ayes: All. Motion passed. **APPROVED AS RECOMMENDED.**

5-7. INFORMATION: BUDGET STATUS REPORT

Cathy Leoncio presented the staff report. Report received with no questions or comments from the Housing Commission.

5-8. INFORMATION: PROGRAM ACTIVITY REPORT

Daniel Taylor presented the staff report. Mr. Taylor reported that the Family Self-Sufficiency (FSS) staff participated in a meeting with coordinators from other housing authorities to share ideas and strategies.

6. COMMITTEE REPORTS

None.

7. COMMISSIONER REPORTS

Cmr. Gerry invited all to a fundraising event at the Hayward Japanese Tea Gardens on Friday, June 16. Cmr. Peixoto invited all to attend the City of Hayward's Street Fair on Thursday, June 15. Cmr. Gacoscos announced that the City of Union City will hold its Sister Cities Festival on August 20 and invited all to attend.

8. COMMUNICATIONS

Christine Gouig introduced Oscar Macias, HACA's new Administrative Analyst. She described Oscar's background and some of the projects that he's been working on. Mr. Macias commented that he's happy to be at HACA and is looking forward to working with the agency. Ms. Gouig proposed a change to the meeting date for the July Housing Commission meeting and polled the Commissioners for their availability. After a brief discussion, the Commission agreed to move the July meeting to Wednesday, July 26.

8. ADJOURNMENT

There being no further business to discuss, Chairperson Gacoscos adjourned the meeting at 9:42 a.m.

Respectfully Submitted,

Melissa Taesali
Executive Assistant

Christine Gouig
Executive Director/Housing Commission Secretary

Approved:

Housing Commission Chairperson

NEW BUSINESS

July 26, 2017

HOUSING AUTHORITY OF THE COUNTY OF ALAMEDA

AGENDA STATEMENT

Meeting Date: July 26, 2017

Subject: Presentation of the 2017 HACA Scholarship Winners

Exhibits Attached: 2017 HACA Scholarship Winners

Recommendation: Receive Presentation and Acknowledge Winners

DISCUSSION

The Housing Authority’s Scholarship Program includes a presentation to the Housing Commission of the applicants who were selected by the Scholarship Committee to receive a scholarship award. The Committee recommended \$15,000 in scholarships for 17 applicants and your Commission approved the Committee’s recommendations at your June meeting.

Staff will present the scholarship winners who are in attendance at the meeting and recognize them for their achievements. Five recipients have responded at this time. The recipients are listed, by city, on the attached exhibit.

**HOUSING AUTHORITY OF THE COUNTY OF ALAMEDA
2017 HACA Scholarship Winners**

CITY	# OF SCHOLARSHIP WINNERS
Dublin	2
Fremont	2
Hayward	2
San Leandro	2
San Lorenzo	1
Union City	8

2017 HACA Scholarship Award Details

DUBLIN

	NAME	SCHOOL	DEGREE/FIELD OF STUDY	AWARD	WINNER FROM PREVIOUS YEAR
1.	Jasmine Batts-Brooks	Las Positas	Performing Arts	\$500	--
2.	Deeletra Stroughter	Psychology	JFK University	\$500	--

FREMONT

	NAME	SCHOOL	DEGREE/FIELD OF STUDY	AWARD	WINNER FROM PREVIOUS YEAR
1.	Yael Fisher	Chabot College	Human Development	\$750	--
2.	Stacey Troupe	Oholone College	Business	\$750	--

HAYWARD

	NAME	SCHOOL	DEGREE/FIELD OF STUDY	AWARD	WINNER FROM PREVIOUS YEAR
1.	Jacqueline Rodriguez	College of San Mateo	Forensic Science Biology	\$750	--
2.	Sarah Simpson	San Francisco State	Kinesiology	\$1000	--

SAN LEANDRO

	NAME	SCHOOL	DEGREE/FIELD OF STUDY	AWARD	WINNER FROM PREVIOUS YEAR
1.	Razan Hussin	Community College	Dental Hygiene	\$750	--
2.	Mohamed Musa	Chabot College	Civil Engineering	\$750	2015, 2016

SAN LORENZO

	NAME	SCHOOL	DEGREE/FIELD OF STUDY	AWARD	WINNER FROM PREVIOUS YEAR
1.	Carl Brown	Chabot College	Business	\$750	--

UNION CITY

	NAME	SCHOOL	DEGREE/FIELD OF STUDY	AWARD	WINNER FROM PREVIOUS YEAR
1.	Jasleen Abaya	Oholone College	Nutrition Science	\$750	--
2.	John Paul Abaya	UC San Diego	Undeclared	\$1750	--
3.	Chika Achike	CSU East Bay	Psychology	\$1250	--
4.	Tamana Ahadi	CSU East Bay	Psychology	\$1250	2016
5.	Charmaine Jones	CSU East Bay	Sociology	\$1250	--
6.	Stacy Sorrells	San Jose State	Library & Information Services (Masters)	\$1250	2011, 2015, 2016
7.	Kimberly Trujillo	Ca. Nurses Institute	Certified Nursing Assistant	\$500	--
8.	Jasmine Vilchis	City College	Culinary Arts	\$500	--

HOUSING AUTHORITY OF THE COUNTY OF ALAMEDA

AGENDA STATEMENT

Meeting Date: July 26, 2017

Subject: Recognition of Employees' Years of Service

Exhibits Attached: None

Recommendation: Receive presentation and acknowledge employees

BACKGROUND

The Housing Authority's service awards program includes a presentation to the Housing Commission of staff who have achieved 25 years or more of service (in five year increments). Two employees, Ron DeSilva and Lisa Gatchallan, will be presented to your Commission.

Both Ron and Lisa are Account Specialists in our Finance Department. Details of their employment will be presented at the meeting. We are very proud of these employees' accomplishments, work, and tenure at the Housing Authority.

HOUSING AUTHORITY OF ALAMEDA COUNTY

AGENDA STATEMENT

Meeting Date: July 26, 2017

Subject: Recognize Roger Escobar as HACA's Shining Star for July-December 2017

Exhibits Attached: None

BACKGROUND

In 2006 the Housing Authority created a Communications Committee composed of staff from all departments. The Committee created an "Employee of the Quarter" recognition program to acknowledge exceptional individual contributions of HACA employees. At the end of 2011 the Committee decided to revamp the program to allow more time for chosen employees to enjoy their recognition. The Committee re-named the award "HACA's Shining Star" and extended the recognition period to six months, so there will be two Shining Stars per year.

DISCUSSION

The Housing Authority is privileged to have on its staff Roger Escobar, a Housing Specialist in the Programs Department. Roger's selection was announced at the HACA All Staff meeting held on June 27. The comments below were submitted by those who nominated Roger and describe his outstanding work in the following categories: Problem Solving, Team Effort & Flexibility in Working with Others, and Customer Service:

"I would like to nominate Roger Escobar in the areas of Problem Solving and Team Effort. Since taking on a new, and complicated, role in the agency with the Program Integrity team, Roger has excelled and I believe found his niche within the agency. He is always available to coworkers, new and tenured, to review or research possible integrity issues. He communicates his concerns to staff clearly. He applies HACA policy fairly when determining violations of the program, whether HACA can move forward on the violation or not. His research skills allow our investigation team to have a thorough understanding of each case. He works to create solutions that hold the participants responsible and protect the integrity of our agency. He communicates professionally, both written and verbally, to tenants and owners, on very sensitive matters. He provides translation support at the drop of a dime. Roger is a tremendous asset to the agency and I would like to acknowledge him for the hard work he brings day in and day out."

Staff recommends that your Housing Commission recognize Roger Escobar as "HACA's Shining Star" for July-December 2017.

HOUSING AUTHORITY OF THE COUNTY OF ALAMEDA

AGENDA STATEMENT

Meeting: July 26, 2017

Subject: Section Eight Management Assessment Program (SEMAP)

Exhibits Attached: SEMAP Certification and Resolution 09-17

Recommendation: Adopt a resolution authorizing submission of the SEMAP Certification to HUD

Financial Statement: None

BACKGROUND

The Section Eight Management Assessment Program (SEMAP) measures 14 key performance indicators of public housing agencies (PHAs) that administer the Housing Choice Voucher program. By doing so, SEMAP helps HUD target monitoring and assistance to PHAs that need the most improvement.

The 14 indicators of performance show whether PHAs help eligible families to afford decent rental units at a reasonable subsidy cost as intended by federal housing legislation. The 14 key indicators of PHA performance are:

1. Proper selection of applicants from the Housing Choice Voucher waiting list
2. Sound determination of reasonable rent for each unit leased
3. Accurate verification of family income
4. Maintenance of a current schedule of allowances for tenant-paid utilities
5. Performance of quality control inspections to ensure housing quality
6. Assurance that landlords and tenants promptly correct housing quality deficiencies
7. Expansion of housing choice outside areas of poverty or minority concentration
8. Establishment of Payment Standards within the required range of the HUD Fair Market Rents
9. Timely annual reexamination of family income
10. Correct calculation of the tenant share of the rent and the housing assistance payment (HAP) made to the landlord
11. Assurance that units comply with HUD's Housing Quality Standards (HQS) before families enter into leases and PHAs enter into HAP contracts
12. Timely annual HQS inspections
13. Assurance that all available Housing Choice Vouchers are used
14. Enrollment of families into the Family Self-Sufficiency (FSS) Program and the number of families with escrow accounts

HACA AGENDA ITEM NO.: 6-4.

SEMAP scores are based on PHA self-certification, HUD's national database of tenant information, and information from audits conducted annually by independent auditors. Each indicator has points assigned to it, with a total possible point score of 145. HUD annually assigns a PHA a rating on each of the 14 indicators and generates an overall performance ratio of high (90-100%), standard (60-89%), or troubled (less than 60%). Metropolitan PHAs like HACA are also able to earn bonus points for their achievements in encouraging assisted families to choose housing in low poverty areas.

Every PHA must submit its SEMAP Certification within 60 days of the end of its fiscal year. Ours is due by August 29, 2017 as our fiscal year ended June 30th.

DISCUSSION AND ANALYSIS

The attached SEMAP Certification is a product of random sampling done internally by staff at the end of each quarter of the fiscal year July 1, 2016 through June 30, 2017, and data from HUD's national database of tenant information. HACA's overall rating is "high" with 100% (145 points).

The table on the following page provides you with a review of HACA's performance under SEMAP for the last four years.

SEMAP Certification Review 2014 to 2017						
Indicator	Indicator Description	Maximum Number of Possible Points	2014 Final Earned Points	2015 Final Earned Points	2016 Final Earned Points	2017 Certification
1	Wait List	15	15	15	15	15
2	Reasonable Rent	20	20	20	15	20
3	Determination of Adjusted Income	20	20	20	20	20
4	Utility Allowance Schedule	5	5	5	5	5
5	HQS Quality Control Inspections	5	5	5	5	5
6	HQS Enforcement	10	10	10	10	10
7	Expanding Housing Opportunities	5	5	5	5	5
8	Payment Standards	5	5	5	5	5
9	Annual Reexaminations	10	10	10	10	10
10	Correct Tenant Rent Calculations	5	5	5	5	5
11	Pre-Contract HQS Inspections	5	5	5	5	5
12	Annual HQS Inspections	10	10	10	10	10
13	Lease-Up	20	20	20	20	20
14	FSS Enrollment & Escrow Accounts	10	10	10	10	10
Earned Points			145	145	140	145
Deconcentration Bonus – Extra 5 Points		5	5	5	5	5
Total Earned Points		145	150	150	145	150
Maximum Number of Points Possible		145	145	145	145	145
FINAL SCORE as a Percentage		100%	100%	100%	100%	100%
SEMAP RATING			High	High	High	High

HOUSING AUTHORITY OF THE COUNTY OF ALAMEDA

RESOLUTION NO.: 09-17

**RESOLUTION APPROVING SECTION EIGHT MANAGEMENT ASSESSMENT PROGRAM
CERTIFICATION AND AUTHORIZING SUBMITTAL OF CERTIFICATION TO THE
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

WHEREAS, the U. S. Department of Housing and Urban Development (HUD) has established a Section Eight Management Assessment Program (SEMAP) to measure the performance of housing authorities that administer the Section 8 Housing Choice Voucher Program; and

WHEREAS, SEMAP requires that housing authorities self-certify performance in connection with the 14 SEMAP indicators; and

WHEREAS, HUD reviews the self-certification and other data available from on-line reporting systems and financial submissions to rank a housing authority's performance and issues a score; and

WHEREAS, the Housing Authority of the County of Alameda has completed its SEMAP analysis for the July 1, 2016 – June 30, 2017 fiscal year and is prepared to submit its certification to HUD;

NOW, THEREFORE, BE IT RESOLVED, that the Housing Commission does hereby approve and accept the SEMAP certification as presented and authorizes the Executive Director to submit it and any other information HUD may require to process the certification.

PASSED, APPROVED AND ADOPTED by the Housing Commission of the Housing Authority of the County of Alameda on this 26th day of July 2017 by the following vote:

AYES:

NOES:

ABSTAIN:

EXCUSED:

ABSENT:

Attest:

Housing Commission Chairperson

Christine Gouig
Executive Director/Housing Commission Secretary

Adopted: _____

Assessment Profile	Reports	Submission
List	Summary	Certification
Field Office:	9APH SAN FRANCISCO HUB OFFICE	Profile
Housing Agency:	CA067 Alameda County	Comments
PHA Fiscal Year End:	6/30/2017	

OMB Approval No. 2577-0215

SEMAP CERTIFICATION (Page 1)

Public reporting burden for this collection of information is estimated to average 12 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and you are not required to respond to, a collection of information unless it displays a currently valid OMB control number.

This collection of information is required by 24 CFR sec 985.101 which requires a Public Housing Agency (PHA) administering a Section 8 tenant-based assistance program to submit an annual SEMAP Certification within 60 days after the end of its fiscal year. The information from the PHA concerns the performance of the PHA and provides assurance that there is no evidence of seriously deficient performance. HUD uses the information and other data to assess PHA management capabilities and deficiencies, and to assign an overall performance rating to the PHA. Responses are mandatory and the information collected does not lend itself to confidentiality.

Check here if the PHA expends less than \$300,000 a year in federal awards ☐

Indicators 1 - 7 will not be rated if the PHA expends less than \$300,000 a year in Federal awards and its Section 8 programs are not audited for compliance with regulations by an independent auditor. A PHA that expends less than \$300,000 in Federal awards in a year must still complete the certification for these indicators.

Performance Indicators**1 Selection from Waiting List (24 CFR 982.54(d)(1) and 982.204(a))**

a. The HA has written policies in its administrative plan for selecting applicants from the waiting list.

PHA Response ☒ Yes ☐ No

b. The PHA's quality control samples of applicants reaching the top of the waiting list and admissions show that at least 98% of the families in the samples were selected from the waiting list for admission in accordance with the PHA's policies and met the selection criteria that determined their places on the waiting list and their order of selection.

PHA Response ☒ Yes ☐ No

2 Reasonable Rent (24 CFR 982.4, 982.54(d)(15), 982.158(f)(7) and 982.507)

a. The PHA has and implements a reasonable written method to determine and document for each unit leased that the rent to owner is reasonable based on current rents for comparable unassisted units (i) at the time of initial leasing, (ii) before any increase in the rent to owner, and (iii) at the HAP contract anniversary if there is a 5 percent decrease in the published FMR in effect 60 days before the HAP contract anniversary. The PHA's method takes into consideration the location, size, type, quality, and age of the program unit and of similar unassisted units and any amenities, housing services, maintenance or utilities provided by the owners.

PHA Response ☒ Yes ☐ No

b. The PHA's quality control sample of tenant files for which a determination of reasonable rent was required to show that the PHA followed its written method to determine reasonable rent and documented its determination that the rent to owner is reasonable as required for (check one):

PHA Response ☒ At least 98% of units sampled ☐ 80 to 97% of units sampled

3 Determination of Adjusted Income (24 CFR part 5, subpart F and 24 CFR 982.516)

The PHA's quality control sample of tenant files show that at the time of admission and reexamination, the PHA properly obtained third party verification of adjusted income or documented why third party verification was not available; used the verified information in determining adjusted income; properly attributed allowances for expenses; and, where the family is responsible for utilities under the lease, the PHA used the appropriate utility allowances for the unit leased in determining the gross rent for (check one):

PHA Response ☒ At least 90% of files sampled ☐ 80 to 89% of files sampled
☐ Less than 80% of files sampled

4 Utility Allowance Schedule (24 CFR 982.517)

The PHA maintains an up-to-date utility schedule. The PHA reviewed utility rate data that it obtained within the last 12 months, and adjusted its utility allowance schedule if there has been a change of 10% or more in a utility rate since the last time the utility allowance schedule was revised.

PHA Response ☒ Yes ☐ No

5 HQS Quality Control (24 CFR 982.405(b))

The PHA supervisor (or other qualified person) reinspected a sample of units during the PHA fiscal year, which met the minimum sample size required by HUD (see 24 CFR 985.2), for quality control of HQS inspections. The PHA supervisor's reinspected sample was drawn from recently completed HQS inspections and represents a cross section of neighborhoods and the work of cross section of inspectors.

PHA Response ☒ Yes ☐ No

6 HQS Enforcement (24 CFR 982.404)

The PHA's quality control sample of case files with failed HQS inspections shows that, for all cases sampled, any cited life-threatening HQS deficiencies were corrected within 24 hours from the inspection and, all other cited HQS deficiencies were corrected within no more than 30 calendar days from the inspection or any PHA-approved extension, or, if HQS deficiencies were not corrected within the required time frame, the PHA stopped housing assistance payments beginning no later than the first of the month following the correction period, or took prompt and vigorous action to enforce the family obligations for (check one):

PHA Response ☒ At least 98% of cases sampled ☐ Less than 98% of cases sampled

7 Expanding Housing Opportunities.

(24 CFR 982.54(d)(5), 982.153(b)(3) and (b)(4), 982.301(a) and 982.301(b)(4) and (b)(12))

Applies only to PHAs with jurisdiction in metropolitan FMR areas

Check here if not applicable ☐

a. The PHA has a written policy to encourage participation by owners of units outside areas of poverty or minority concentration which clearly delineates areas in its jurisdiction that the PHA considers areas of poverty or minority concentration, and which includes actions the PHA will take to encourage owner participation.

PHA Response ☒ Yes ☐ No

b. The PHA has documentation that shows that it took actions indicated in its written policy to encourage participation by owners outside areas of poverty and minority concentration.

PHA Response ☒ Yes ☐ No

c. The PHA has prepared maps that show various areas, both within and neighboring its jurisdiction, with housing opportunities outside areas of poverty and minority concentration; the PHA has assembled information about job opportunities, schools and services in these areas; and the PHA uses the maps and related information when

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briefing voucher holders.

PHA Response ☒ Yes ☐ No

d. The PHA's information packet for certificate and voucher holders contains either a list of owners who are willing to lease, or properties available for lease, under the voucher program, or a list of other organizations that will help families find units and the list includes properties or organizations that operate outside areas of poverty or minority concentration.

PHA Response ☒ Yes ☐ No

e. The PHA's information packet includes an explanation of how portability works and includes a list of neighboring PHAs with the name, address and telephone number of a portability contact person at each.

PHA Response ☒ Yes ☐ No

f. The PHA has analyzed whether voucher holders have experienced difficulties in finding housing outside areas of poverty or minority concentration and, where such difficulties were found, the PHA has considered whether it is appropriate to seek approval of exception payment standard amounts in any part of its jurisdiction and has sought HUD approval when necessary.

PHA Response ☒ Yes ☐ No

Performance Indicators**8 Payment Standards(24 CFR 982.503)**

The PHA has adopted current payment standards for the voucher program by unit size for each FMR area in the PHA jurisdiction and, if applicable, for each PHA-designated part of an FMR area, which do not exceed 110 percent of the current applicable FMR and which are not less than 90 percent of the current FMR (unless a lower percent is approved by HUD). (24 CFR 982.503)

PHA Response ☒ Yes ☐ No

FMR Area Name

FMR 1 of 1

Enter current FMRs and payment standards (PS)

0-BR FMR	<input type="text" value="1435"/>	1-BR FMR	<input type="text" value="1723"/>	2-BR FMR	<input type="text" value="2173"/>	3-BR FMR	<input type="text" value="3017"/>	4-BR FMR	<input type="text" value="3477"/>
PS	<input type="text" value="1521"/>	PS	<input type="text" value="1826"/>	PS	<input type="text" value="2303"/>	PS	<input type="text" value="3198"/>	PS	<input type="text" value="3579"/>

If the PHA has jurisdiction in more than one FMR area, and/or if the PHA has established separate payment standards for a PHA-designated part of an FMR area, add similar FMR and payment standard comparisons for each FMR area and designated area.

9 Timely Annual Reexaminations(24 CFR 5.617)

The PHA completes a reexamination for each participating family at least every 12 months.(24 CFR 5.617)

PHA Response ☒ Yes ☐ No

10 Correct Tenant Rent Calculations(24 CFR 982, Subpart K)

The PHA correctly calculates tenant rent in the rental certificate program and the family rent to owner in the rental voucher program (24 CFR 982,Subpart K)

PHA Response ☒ Yes ☐ No

11 Pre-Contract HQS Inspections(24 CFR 982.305)

Each newly leased unit passes HQS inspection before the beginning date of the assisted lease and HAP contract. (24 CFR 982.305)

PHA Response ☒ Yes ☐ No

12 Continuing HQS Inspections(24 CFR 982.405(a))

The PHA inspects each unit under contract as required (24 CFR 982.405(a))

PHA Response ☒ Yes ☐ No

13 Lease-Up

The PHA executes assistance contracts on behalf of eligible families for the number of units that has been under budget for at least one year. The PHA executes assistance contracts on behalf of eligible families for the number of units that has been under budget for at least one year

PHA Response ☒ Yes ☐ No

14 Family Self-Sufficiency (24 CFR 984.105 and 984.305)

14a. Family Self-Sufficiency Enrollment. The PHA has enrolled families in FSS as required.

Applies only to PHAs required to administer an FSS program.

Check here if not applicable ☐

a. Number of mandatory FSS slots (Count units funded under the FY 1992 FSS incentive awards and in FY 1993 and later through 10/20/1998. Exclude units funded in connection with Section 8 and Section 23 project-based contract terminations; public housing demolition, disposition and replacement; HUD multifamily property sales; prepaid or terminated mortgages under section 236 or section 221(d)(3); and Section 8 renewal funding. Subtract the number of families that successfully completed their contracts on or after 10/21/1998.)

46

Or, Number of mandatory FSS slots under HUD-approved exception (If not applicable, leave blank)

b. Number of FSS families currently enrolled

134

c. Portability: If you are the initial PHA, enter the number of families currently enrolled in your FSS program, but who have moved under portability and whose Section 8 assistance is administered by another PHA

0

Percent of FSS slots filled (b+c divided by a) (This is a nonenterable field. The system will calculate the percent when the user saves the page)

291

14b. Percent of FSS Participants with Escrow Account Balances. The PHA has made progress in supporting family self-sufficiency as measured by the percent of currently enrolled FSS families with escrow account balances. (24 CFR 984.305)

Applies only to PHAs required to administer an FSS program

Check here if not applicable ☐

PHA Response ☒ Yes ☐ No

Portability: If you are the initial PHA, enter the number of families with FSS escrow accounts currently enrolled in your FSS program, but who have moved under portability and whose Section 8 assistance is administered by another PHA

0

15 Deconcentration Bonus

The PHA is submitting with this certification data which show that :

(1) Half or more of all Section 8 families with children assisted by the PHA in its principal operating area resided in low poverty census tracts at the end of the last PHA FY;

(2) The percent of Section 8 mover families with children who moved to low poverty census tracts in the PHA's principal operating area during the last PHA FY is at least two percentage points higher than the percent of all Section 8 families with children who resided in low poverty census tracts at the end of the last PHA FY; or

(3) The percent of Section 8 mover families with children who moved to low poverty census tracts in the PHA's principal operating area over the last two PHA FY is at least two percentage points higher than the percent of all Section 8 families with children who resided in low poverty census tracts at the end of the second to last PHA FY.

PHA Response ☒ Yes ☐ No

SEMAP CERTIFICATION - Addendum for Reporting Data for Deconcentration Bonus Indicator

PHA Name **Alameda County** Date **7/20/2017**
 Principal Operating Area of PHA **Alameda County**

(The geographic entity for which the Census tabulates data)

Special Instructions for State or regional PHAs. Complete a copy of this addendum for each metropolitan area or portion of a metropolitan area (i.e., principal operating areas) where the PHA has assisted 20 or more Section 8 families with children in the last completed PHA FY. HUD will rate the areas separately and the separate ratings will then be weighted by the number of assisted families with children in each area and averaged to determine bonus points.

1990 Census Poverty Rate of Principal Operating Area **11**

Criteria to Obtain Deconcentration Indicator Bonus Points

To qualify for bonus points, the PHA must complete the requested information and answer yes for only one of the 3 criteria below. However, State and regional PHAs must always complete line 1) b for each metropolitan principal operating area.

1 a Number of Section 8 families with children assisted by the PHA in its principal operating area at the end of the last PHA FY who live in low poverty census tracts. A low poverty census tract is a tract with a poverty rate at or below the overall poverty rate for the principal operating area of the PHA, or at or below 10% whichever is greater.

2584

b Total Section 8 families with children assisted by the PHA in its principal operating area at the end of the last PHA FY.

3070

c Percent of all Section 8 families with children residing in low poverty census tracts in the PHA's principal operating area at the end the last PHA FY (line a divided by line b).

84

Is line c 50% or more? Yes ☒ No ☐

2

a Percent of all Section 8 families with children residing in low poverty census tracts at the end of the last completed PHA FY.

b Number of Section 8 families with children who moved to low poverty census tracts during the last completed PHA FY.

c Number of Section 8 families with children who moved during the last completed PHA FY

d Percent of all Section 8 mover families with children who moved to low poverty census tracts during the last PHA fiscal year (line b divided by line c).

Is line d at least two percentage points higher than line a? Yes ☐ No ☒

3

a Percent of all Section 8 families with children that residing in low poverty census tracts in the PHAs principle operating area at the end of the second to last completed PHA FY.

b Number of Section 8 families with children who moved to low poverty census tracts during the last two completed PHA FYs.

c Number of Section 8 families with children who moved during the last two completed PHA FYs.

HOUSING AUTHORITY OF THE COUNTY OF ALAMEDA

AGENDA STATEMENT

Meeting: July 26, 2017

Subject:	Section 8 Administrative Plan Policy Revisions
Exhibits:	Attachment A: Redline Summary of Policy Revisions
Recommendation:	Approve Proposed Policy Revisions
Financial Statement:	None

BACKGROUND

HACA’s Section 8 Housing Choice Voucher (HCV) Program Administrative Plan (Admin Plan) sets forth HACA’s policies for administering the Section 8 Program in a manner consistent with HUD requirements and HACA’s Agency Plan – its policies, programs, operations, and strategies for meeting local housing needs and goals. HACA’s Admin Plan is available for public review.

From time to time it becomes necessary to amend the Admin Plan in order to incorporate new or changed HUD regulations, new or revised HACA practices or program initiatives, or to make clarifications or corrections. Amendments that change HACA policy are brought to your Housing Commission for approval. Today, revisions to Chapter 3, 6, 7, 8, 10, 15, 16, and 17 are being submitted for your approval.

DISCUSSION and ANALYSIS

CHAPTER 3 – ELIGIBILITY

3-II.A. INCOME ELIGIBILITY AND TARGETING (page 3-11)

Language was updated to clarify that a family is considered to be “continuously assisted” if the family was leasing a unit under any 1937 Housing Act program at the time it was selected from HACA’s waiting list — not when the family was issued a voucher as is the current definition.

3-II.E. STUDENTS ENROLLED IN INSTITUTIONS OF HIGHER EDUCATION (page 3-18 to 3-20)

In accordance with Federal Register (FR) Notice 9/21/16, the criteria to be considered an *Independent Student* as defined by the Department of Education was updated to include

language and/or verification requirements regarding foster care, emancipated minor/legal guardianship, and unaccompanied youth and the addition of “active duty” and “unusual circumstances determined by a financial aid administrator” as qualifying criteria.

Additionally, in accordance with FR Notice 9/21/16, HACA incorporated the addition of a *Vulnerable Youth* section as defined by the Department of Education. The term was also added in Chapters 7 and 11.

CHAPTER 6 – INCOME AND SUBSIDY DETERMINATIONS

6-III.C. APPLYING PAYMENT STANDARDS (page 6-63 to 6-65)

The *Decreases* section was previously updated in November 2016 in accordance with the Housing Opportunities Through Modernization Act (HOTMA), providing that no Public Housing Authority (PHA) in the Housing Choice Voucher (HCV) Program is required, as a result of a reduction in the Fair Market Rent (FMR), to reduce the payment standard applied to a family continuing to reside in a unit under a housing assistance payment (HAP) contract at the time the FMR was reduced. Staff adopted this protection; however, software limitations may make this provision difficult to implement. Therefore, staff proposes to revert to its original policy, as is also allowed by HUD, which states that HACA will advise the family that the application of the lower payment standard will be deferred until the second regular reexamination following the effective date of the decrease in the payment standard. Staff will revisit this provision after our new housing software is installed later this year.

CHAPTER 7 – VERIFICATION

7-II.E. VERIFICATION OF STUDENT STATUS (page 7-19 to 7-20)

Independent Student and *Vulnerable Youth* language was added in accordance with the changes to Chapter 3 regarding the qualifying criteria for *Independent Students*.

CHAPTER 8 – HOUSING QUALITY STANDARDS AND RENT REASONABLENESS DETERMINATIONS

8-II.B. INITIAL HQS INSPECTION (page 8-13)

Additional “Initial Inspection” language was added in accordance with FR Notice 1/18/17 to state that PHAs may, but are not required to, approve assisted tenancy and start HAP if the unit fails the HQS inspection. However, HACA will require units to pass the HQS inspection on or before the effective date of the HAP contract. In addition, HACA will not rely on alternative inspections and will conduct an HQS inspection for each unit prior to executing a HAP contract with the owner.

CHAPTER 10 – MOVING WITH CONTINUED ASSISTANCE AND PORTABILITY

10-I.B. RESTRICTIONS ON MOVES (page 10-3 to 10-4)

The *Insufficient Funding* section was updated in accordance with Notice PIH 2016-09 to further detail the grounds under which HACA may or may not deny a family permission to move either within or outside HACA’s jurisdiction during times of insufficient funding (i.e., shortfall).

10-II.B. INITIAL PHA ROLE (page 10-12, 10-17 and 10-18)

The “Briefing” section was updated to include additional clarification of HACA’s responsibility to provide families with information on portability.

The “Initial Billing Deadline” section was updated in accordance with Notice PIH 2016-09, removing HACA’s responsibility to follow up with receiving PHAs about late initial billing notices. Instead, language was updated to specify that HACA will not honor billing submissions past the billing deadline, and will inform the receiving PHA in writing.

The “Monthly Billing Payments” section was updated to include HACA procedures, ensuring that payments from receiving PHAs are received within payment deadlines by utilizing direct deposit when it becomes available with HACA’s new housing software.

In addition, language was added to state that if HACA extends the term of the voucher, the receiving PHA’s voucher will expire 30 calendar days from the new expiration date of HACA’s voucher in accordance with Notice PIH 2016-09.

10-II.C. RECEIVING PHA ROLE (page 10-22, 10-25, and 10-28)

The *Voucher Term* section was updated to state that if the initial PHA extends the term of the voucher, HACA’s voucher will expire 30 calendar days from the new expiration date of the initial PHA’s voucher in accordance with Notice PIH 2016-09.

In accordance with Notice PIH 2016-09, the “Annual Reexamination” section was updated to state that HACA will send the initial PHA a copy of the updated HUD-50058 by regular mail no later than 10 business days after the effective date of the reexamination instead of at the same time the family and owner are notified of the reexamination results.

In accordance with Notice PIH 2016-09, the “Absorbing a Portable Family” section was updated with additional language stating that HACA will provide the initial PHA with 30 days’ advance notice no later than 10 business days following the effective date of the termination of the billing arrangement.

CHAPTER 15 – SPECIAL HOUSING TYPES

15-VII.B. FAMILY ELIGIBILITY (page 15-16 to 15-17)

Various formatting issues from previous versions of the Admin Plan were fixed. Procedural requirements have not changed with the exception of removing language from the homeownership option eligibility criteria, stating that a family must not have family-caused HQS violations within the past year.

CHAPTER 16 – PROGRAM ADMINISTRATION

16-IX.C. NOTIFICATION (page 16-43)

After further review of the Violence Against Women Act (VAWA) Final Rule and Notice PIH 2017-08, staff determined that HACA is not required to provide applicants with VAWA information at the time they request an application for housing assistance but, rather, at the time they are provided assistance. Staff also determined that HACA is not required to provide participants with VAWA information at each annual reexamination. Language was updated accordingly, as these changes will greatly reduce notification costs.

In addition, VAWA forms, Emergency Transfer Plan requirements, and/or timelines were updated in Chapter 3, 10 and 12.

CHAPTER 17 – PROJECT-BASED VOUCHERS

17-I.A. OVERVIEW (page 17-2 to 17-3)

In accordance with FR Notice 1/18/17, HACA may now project-base up to 20 percent of its authorized units, instead of 20 percent of its voucher budget authority.

In accordance with FR Notice 1/18/17, the “Additional Project-Based Units” section was added to state that HACA will set aside units above the 20 percent program limit.

In accordance with FR Notice 1/18/17, the “Units Not Subject to the PBV Program Limitation” section was added to state that HACA may project-base one or more of the unit types described in this section at its discretion.

17-II.F. CAP ON NUMBER OF PBV UNITS IN EACH PROJECT (page 17-11 to 17-14)

In accordance with FR Notice 1/18/17, the “Exceptions to 25 Percent/25 Unit per Project Cap” section was updated to replace “*qualifying families*” language with “elderly families and Supportive Services Households,” with Supportive Services Households meaning households eligible for supportive services available to all families receiving PBV assistance in the project. Also, additional services were added to the services provided list.

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In addition, the “Projects not Subject to a Project Cap” section was added to clarify that HACA does not have any PBV units that are subject to the per project cap exception.

17-III.D. INSPECTING UNITS (page 17-18 to 17-19)

In accordance with FR Notice 1/18/17, the “Pre-HAP Contract Inspections” section was updated to state that HACA will not enter into a PBV HAP contract until all units that will be under contract fully comply with HQS.

17-V.B. HAP CONTRACT REQUIREMENTS (page 17-26)

In accordance with FR Notice 1/18/17, the “Term of HAP Contract” section was updated to state that the term of all PBV HAP contracts will be negotiated with the owner for a 20 year term as is now permitted by HOTMA.

17-VI.D. SELECTION FROM THE WAITING LIST (page 17-33 to 17-34)

In accordance with FR Notice 1/18/17, the “Preferences” section was updated to replace the term “qualified families for excepted units” with the term “elderly families or Supportive Services Households.”

17-VII.D. EXCEPTIONS TO THE OCCUPANCY CAP (page 17-42 to 17-44)

In accordance with FR Notice 1/18/17, the following was removed: “qualifying family” language, language stating that HACA may refer other eligible families to excepted units, and language stating that HACA may amend the HAP contract to reduce the total number of units under the contract if there are no eligible families.

In addition, language was added to detail additional circumstances that would allow families to remain living in an excepted unit.

Also, language was added to detail HACA’s role in the event an excepted unit no longer qualifies as excepted.

17-VIII.B. RENT LIMITS (page 17-47)

In accordance with 24 CFR 888.113(h), the “Use of Small Area FMRs (SAFMRs)” section was added to state that HACA will not apply SAFMRs to HACA’s PBV program.

Staff recommends that your Commission approve the revisions to the Admin Plan. Once approved, staff training will be conducted and the revised Plan will be implemented.

HOUSING AUTHORITY OF THE COUNTY OF ALAMEDA

AGENDA STATEMENT

Meeting: June 26, 2017

Subject:	Assessment of Fair Housing (AFH) Plan
Exhibits:	Attachment B: Draft Alameda County Participating County, Cities and Agencies (PCCA) Memorandum of Understanding (MOU)
Recommendation:	Approve Proposed MOU and Authorize Executive Director to Sign It
Financial Statement:	\$8,457.74 (estimated)

BACKGROUND

The Department of Housing and Urban Development (HUD) released a Final Rule on Affirmatively Furthering Fair Housing (AFFH), which was published in Federal Register Notice 7/16/2015. The Rule responds to recommendations of the Government Accountability Office and stakeholders that HUD enhance its fair housing planning obligations and those of housing authorities and cities and counties that receive Community Development Block Grant (CDBG) and HOME funds. It requires such jurisdictions to conduct an Assessment of Fair Housing (AFH) planning process, which replaces the previously-required assessment called the Analysis of Impediments.

HUD will provide publicly-open data for grantees to use to assess the state of fair housing within their communities and to set locally-determined priorities and goals. The AFH planning process aims to help communities analyze challenges to fair housing choice and establish their own goals and priorities to address the fair housing barriers in their communities.

DISCUSSION and ANALYSIS

HUD's Final Rule permits each housing authority and CDBG/HOME grantee to develop its own AFH Plan or to develop a joint plan with other entities in the housing market area. HUD defines the housing market area to include at least the county and possibly the Core Based Statistical Area (Alameda County and Contra Costa County). All plans, whether individual or joint, must include an analysis of the housing market area so in an area such as Alameda County, where there is dense, contiguous development and good transportation, it makes sense to collaborate on one plan rather than have numerous plans. Staff from Alameda County, the five housing authorities and the cities have agreed to recommend to their respective boards/councils that a

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county-wide AFH Plan be prepared. (The matter will be brought before the respective boards and councils over the next couple months.) The County of Alameda will facilitate the competitive procurement and management of the consultant to be retained and will assume the role of coordinator. The Plan is due to HUD no later than October 5, 2019.

The attached Participating County, Cities and Agencies (PCCA) MOU (Attachment B) outlines the basis for sharing the tasks and costs to prepare the Plan. A Scope of Work has been developed for the consultant and the County expects to issue an RFP in September, with an estimated total cost of \$100,000. Contributions are based upon 35% of costs being paid by the five housing authorities and 65% of costs paid by the 14 cities and the county. The current estimated cost share for HACA is \$8,457.74, but is subject to change once proposals are received and a consultant is selected.

RECOMMENDATION

Staff recommends that your Commission approve the draft MOU and authorize the Executive Director to approve any amendments that may be necessary and to execute it on behalf of HACA.

1. Updated definitions of:
 - Protected Classifications, including protected categories such as transgender and gender expression and genetic identifying information
 - Policy Coverage, adding the prohibition of harassment or discrimination against interns and volunteers
 - Harassment, consolidating various forms of harassment under one definition
2. Clarifies and expands retaliation provisions;
3. Clarifies the complaint procedure and confidentiality provisions; and
4. Better defines the roles and responsibilities of managers and employees.

Recommendation

Staff recommends that your Commission adopt a resolution approving the revised Harassment, Discrimination, and Retaliation Policy & Complaint Procedure.

HOUSING AUTHORITY OF THE COUNTY OF ALAMEDA

RESOLUTION NO.: 10-17

**APPROVING REVISIONS TO THE HOUSING AUTHORITY OF THE COUNTY OF ALAMEDA’S
HARRASSMENT, DISCRIMINATION, AND RETALIATION POLICY & COMPLAINT PROCEDURE**

WHEREAS, the Housing Authority of the County of Alameda (“HACA”) is a member of the Housing Authorities Risk Retention Pool (“HARRP”), which provides risk management services and general liability coverage for its member agencies; and

WHEREAS, HAARP recently implemented a requirement for coverage renewal that requires that its member agencies review certain employment practices policies every three years; and

WHEREAS, in compliance with HARRP’s requirements, HACA’s legal counsel has reviewed HACA’s Harassment, Discrimination, and Retaliation Policy & Complaint Procedure; and

WHEREAS, revisions to HACA’s Harassment, Discrimination, and Retaliation Policy & Complaint Procedure are required in order to incorporate legal counsel’s recommendations;

NOW, THEREFORE, BE IT RESOLVED, that the Housing Commission of the Housing Authority of the County of Alameda does hereby approve the revised Harassment, Discrimination, and Retaliation Policy & Complaint Procedure as presented at this meeting.

PASSED, APPROVED AND ADOPTED by the Housing Commission of the Housing Authority of the County of Alameda on this 26th day of July 2017 by the following vote:

AYES:

NOES:

ABSTAIN:

EXCUSED:

ABSENT:

Housing Commission Chairperson

Attest:

Christine Gouig
Executive Director/Housing Commission Secretary

Adopted: _____



HARASSMENT, DISCRIMINATION, AND RETALIATION POLICY & COMPLAINT PROCEDURE

I. PURPOSE

The purpose of this Policy is to: establish a strong commitment to prohibit and prevent harassment, discrimination, and retaliation in employment; to define those terms; and to set forth a procedure for investigating and resolving internal complaints of harassment, discrimination, and retaliation. The Housing Authority of the County of Alameda encourages all covered individuals to report – as soon as possible – any conduct that they believe violates this Policy.

II. POLICY

The Housing Authority of the County of Alameda has zero tolerance for any conduct that violates this Policy. In addition, the Housing Authority prohibits retaliation against individuals who complain of conduct believed to violate this Policy. Conduct need not rise to the level of a violation of state or federal law to violate this Policy. Rather, a single act can violate this Policy and provide grounds for discipline or other appropriate sanctions.

This Policy applies to all terms and conditions of employment, including, but not limited to, hiring, placement, promotion, disciplinary action, layoff, transfer, leave of absence, compensation, and training.

Harassment, discrimination, or retaliation against an applicant, unpaid intern or volunteer, or employee by a supervisor, management employee, elected or appointed official, co-worker, member of the public, contractor, or vendor on the basis of race, religion, color, sex (including gender, gender identity, gender expression, transgender, pregnancy, and breastfeeding), national origin, ancestry, citizenship status, disability, medical condition, genetic characteristics or information, marital status, age, sexual orientation (including homosexuality, bisexuality, or heterosexuality), military or veteran status, or any other protected classification as defined below, will not be tolerated.

Disciplinary action or other appropriate sanction up to and including termination will be instituted for prohibited behavior as defined below.

Any retaliation against a person for filing a complaint or participating in the complaint resolution process is prohibited. Individuals found to be retaliating in violation of this

Policy will be subject to appropriate sanction or disciplinary action up to and including termination.

III. DEFINITIONS

- A. **Protected Classifications**: This Policy prohibits harassment or discrimination because of an individual's actual or perceived protected classification. "Protected classification" includes: race, religion, color, national origin, ancestry, citizenship status, sex (including gender, gender identity, gender expression, transgender, pregnancy, and breastfeeding), disability, medical condition, genetic characteristics or information, marital status, age, sexual orientation (including heterosexuality, homosexuality, and bisexuality), military or veteran status, or any other basis protected by law.
- B. **Policy Coverage**: This Policy prohibits Housing Authority officials, officers, employees, contractors, or vendors from harassing or discriminating against applicants, officers, officials, employees, contractors, vendors, unpaid interns or volunteers, or clients because of: 1) an individual's protected classification; 2) the perception that an individual has a protected classification; or 3) an individual's association with a person who has or is perceived to have a protected classification.
- C. **Discrimination**: This Policy prohibits treating individuals differently or adversely because of the individual's protected classification as defined in the Policy.
- D. **Harassment**: Harassment may include, but is not limited to, the following types of behavior that is taken because of a person's protected classification. Note that harassment is not limited to conduct that Housing Authority employees take. Under certain circumstances, harassment can also include conduct taken by those who are not employees, such as elected or appointed officials, persons providing services under contracts or even members of the public:
 - 1. **Speech** – such as epithets, jokes, derogatory comments or slurs, and propositioning on the basis of a protected classification. This might include inappropriate comments on appearance (including dress or physical features, or dress consistent with gender identification) or race-oriented stories and jokes.
 - 2. **Visual Acts** – such as gestures, posters, notices, bulletins, cartoons, e-mails, photography, or drawings related to a protected classification.
 - 3. **Physical Acts** – such as assault, impeding or blocking movement, offensive touching, stalking, taunting, or any physical interference with normal work or movement. This includes pinching, grabbing, patting, propositioning, leering, making explicit or implied job threats, or promises in return for submission to physical acts.

4. **Unwanted Sexual Advances** – requests for sexual favors, and other acts of a sexual nature where submission is:
 - a. A term of condition of employment, business, or housing assistance participation;
 - b. Used as a basis for employment decisions affecting the employee;
 - c. Conduct unreasonably interfering with an employee's work performance and/or creating an intimidating, hostile, or offensive working environment;
 - d. Used as a basis for making a business decision by an employee regarding a client or vendor.

IV. GUIDELINES FOR IDENTIFYING HARASSMENT:

To help clarify what constitutes harassment in violation of this Policy, the Housing Authority uses the following guidelines:

- Harassment includes any conduct which would be “unwelcome” to an individual of the recipient’s same protected classification or which is taken because of the recipient’s protected classification.
- It is no defense that the recipient appears to have voluntarily “consented” to the conduct at issue. A recipient may not protest for many legitimate reasons, including the need to avoid being insubordinate or to avoid being ostracized.
- Simply because no one has complained about a joke, gesture, picture, physical contact, or comment does not mean that the conduct is welcome. Harassment can evolve over time. The fact that no one is complaining now does not preclude anyone from complaining if the conduct is repeated in the future.
- Even visual, verbal, or physical conduct between two employees who appear to welcome it can constitute harassment of a third individual who observes the conduct or learns about the conduct later. Conduct can constitute harassment even if it is not explicitly or specifically directed at an individual.
- Conduct can constitute harassment in violation of this Policy even if the individual engaging in the conduct has no intention to harass. Even well-intentioned conduct can violate this Policy if the conduct is directed at, or implicates a protected classification, and if an individual of the recipient’s same protected classification would find it offensive (e.g., gifts, over attention, endearing nicknames).
- A single act can violate this Policy and provide grounds for discipline or other appropriate sanctions. Therefore, if you are in doubt as to whether any particular conduct may violate this Policy, do not engage in the conduct, and seek guidance from a supervisor.

V. RETALIATION

Any adverse conduct taken because an applicant, employee, client, vendor, or contractor has reported harassment, or has participated in the complaint and investigation process described below, is prohibited. “Adverse conduct” includes but is not limited to: taking sides because an individual has reported harassment or discrimination, spreading rumors about a complainant, shunning and avoiding an individual who reports harassment or discrimination, or real or implied threats of intimidation to prevent an individual from reporting harassment or discrimination. The following individuals are protected from retaliation:

- Those who make good faith reports of harassment or discrimination;
- Those who are accused of harassment or discrimination;
- Those who associate with an individual who is involved in reporting harassment or discrimination; and
- Those who participate in the complaint or investigation process.

VI. COMPLAINT PROCEDURE

A. An applicant, employee, officer, official, vendor, client, unpaid intern or volunteer who believes he or she has been harassed, discriminated, or retaliated against should immediately make a complaint verbally or in writing with any of the following – there is no need to follow the chain of command:

- Immediate supervisor;
- Any supervisor or manager within or outside of the department;
- Any manager;
- Human Resources Manager.

B. **Processing of Complaints**: Upon receiving notification of a complaint pursuant to this Policy, the Human Resources Manager shall:

1. Provide the complainant with a timely response indicating that the complaint has been received and that a fair, timely, and thorough investigation will be conducted.
2. Timely authorize and supervise a fair and thorough investigation of the complaint by qualified personnel and/or investigate the complaint. The investigation will afford all parties with appropriate due process and include interviews with: 1) the complainant, 2) the accused, and 3) other persons who have relevant knowledge concerning the allegations in the complaint.
3. Review the factual information gathered through the investigation to reach a reasonable conclusion as to whether the alleged conduct constitutes harassment, discrimination, or retaliation giving consideration to all factual

4. information, the totality of the circumstances, including the nature of the conduct and the context in which the alleged incidents occurred.
 5. Report a summary of the determination as to whether harassment, discrimination, or retaliation occurred to appropriate persons, including the complainant, the alleged harasser, the supervisor or department head, and the Executive Director.
 6. If conduct in violation of this Policy occurred, take or recommend to the appointing authority prompt and effective remedial action. The remedial action will be commensurate with the severity of the offense.
 7. Take reasonable steps to protect the complainant from further harassment, discrimination, or retaliation.
 8. Take reasonable steps to protect the complainant from retaliation as a result of communicating the complaint.
- C. The Housing Authority takes a proactive approach to potential Policy violations and will conduct an investigation if a manager becomes aware that harassment, discrimination, or retaliation may be occurring, regardless of whether the recipient or third party reports a potential violation.
- D. **Confidentiality**: Every effort will be made to assure the confidentiality of complaints made under this Policy. Complete confidentiality cannot occur, however, due to the need to fully investigate and the duty to take effective remedial action. As a result, confidentiality will be maintained to the extent possible. An employee who is interviewed during the course of an investigation is prohibited from attempting to influence any potential witness while the investigation is ongoing. An individual who is interviewed during the course of an investigation is prohibited from discussing the substance of the interview, except as otherwise directed by a manager or the Human Resources Manager, or to discuss the interview with a designated representative. Any individual who discusses the content of an investigatory interview with an individual other than a designated representative will be subject to discipline or other appropriate sanction. The Housing Authority will not disclose a completed investigation report except as it deems necessary to support a disciplinary action, to take remedial action, to defend itself in adversarial proceedings, or to comply with the law or court order.

E. **Responsibilities:** Managers are responsible for:

1. Informing employees of this Policy;
2. Modeling appropriate behavior under this Policy;
3. Taking all steps necessary to prevent harassment, discrimination, or retaliation from occurring;
4. Receiving complaints in a fair and serious manner, and documenting steps taken to resolve complaints;
5. Monitoring the work environment and taking immediate appropriate action to stop potential violations, such as removing inappropriate pictures or correcting inappropriate language or behavior;
6. Following up with those who have complained to assure that the behavior has stopped and that there are no reprisals;
7. Reporting potential violations of this Policy of which he or she becomes aware to the Human Resources Manager or Executive Director, regardless of whether a complaint has been submitted; and
8. Informing those who complain of harassment, discrimination, or retaliation of their options to contact the U.S. Equal Employment Opportunity Commission (EEOC) or the California Department of Fair Employment and Housing (DFEH) regarding alleged Policy violations.

Employees and other covered individuals are responsible for:

1. Treating all employees, contractors, clients, and landlords with respect and consideration;
2. Modeling appropriate behavior that conforms to this Policy;
3. Participating in periodic training;
4. Fully cooperating with Housing Authority investigations by responding fully and truthfully to all questions posed during the investigation;
5. Taking no actions to influence any potential witness while the investigation is ongoing;
6. Maintaining the confidentiality of any investigation that the Housing Authority conducts by not disclosing the substance of any investigatory interview, except as directed by the Human Resources Manager or to a designated representative;
7. Reporting any act he or she believes in good faith constitutes harassment, discrimination, or retaliation as defined in the Policy, to his or her immediate supervisor, or a manager, or the Human Resources Manager.

- F. Option to Report to Outside Administrative Agencies*: An individual has the option to report harassment, discrimination, or retaliation to EEOC or the DFEH. These administrative agencies offer legal remedies and a complaint process. The nearest offices are listed in the government section of the telephone book or employees can check the posters that are located on bulletin boards for EEOC and DFEH office locations and telephone numbers. Agency websites are: www.eeoc.gov and www.dfeh.ca.gov.

VII. DISSEMINATION OF POLICY

All employees shall receive a copy of this Policy when they are hired. The Policy may be updated from time to time and redistributed with a form for the employee to sign and return, acknowledging that the employee has received, read, and understands this Policy.

**ACKNOWLEDGEMENT OF RECEIPT AND
UNDERSTANDING
OF HARASSMENT, DISCRIMINATION, AND
RETALIATION POLICY & COMPLAINT PROCEDURE**

I acknowledge the receipt of a copy of the Housing Authority of the County of Alameda’s “Harassment, Discrimination, and Retaliation Policy & Complaint Procedure.” I have read and understand my responsibilities under the Policy and I agree to abide by my responsibilities as outlined. I understand that I will be subject to discipline for violating this Policy or subject to other appropriate sanctions for failing to fulfill my responsibilities as outlined in the Policy.

I understand that the Housing Authority strongly encourages all employees to use the Complaint Procedure described in this Policy to make good faith reports of potential violations. I acknowledge that the Housing Authority of the County of Alameda has authority to investigate any potential violations of this Policy and that I have a duty to cooperate in any such investigation.

Dated: _____

Print Name: _____

Signature: _____

HOUSING AUTHORITY OF ALAMEDA COUNTY

AGENDA STATEMENT

Meeting: July 26, 2017

Subject: Management Compensation Survey Results

Exhibits Attached: 1. Management Salary Range Assignments
2. Summary of Management Salary Survey Results

Recommendation: 1. Accept the comparable agency salary survey and fringe benefit results; the range assignments retroactive to the first pay period of the current fiscal year; and the recommendations for modifications in administering the Pay for Performance plan
2. Continue to complete the three year and annual salary surveys

Financial Statement: Additional costs will be incorporated into the current budget and future budgets, as affordable

I. BACKGROUND

Salary adjustments for management classifications are governed by the Housing Authority's Management Compensation Policy, which was originally adopted by the Housing Commission in 1986, reviewed and revised in 2003 and again in 2009.

A. Management Compensation Policy

There are three primary components of the Management Compensation Policy:

1. **Salary review** – review HACA's management positions every three years and compare their salaries to similar ("benchmark") positions within our comparability pool to ensure that they are assigned a pay range at the median (middle) rate of comparable pool positions.
2. **Total compensation review** – as part of the triennial survey, review total compensation programs for management employees to ensure that HACA's program is competitive.
3. **Cost of Living Adjustment (COLA)** – conduct an annual cost of living adjustment survey by assessing COLAs granted to management employees in the comparability pool, calculating the mean (average) and applying it to both employees' salaries and to HACA's salary range structure.

HACA AGENDA ITEM NO.: 6-8.

The triennial Salary Review component compares HACA's management positions to similar positions within an established comparability pool consisting of the following 12 public entities, including Bay Area cities, the County of Alameda and other Housing Authorities:

1. City of Fremont
2. City of Hayward
3. City of San Leandro
4. City of San Mateo
5. County of Alameda
6. Housing Authority of the City of Alameda
7. Oakland Housing Authority
8. City of Richmond Housing Authority
9. Contra Costa Housing Authority
10. Marin Housing Authority
11. Santa Clara County Housing Authority
12. San Mateo County Housing Authority

The purpose of the triennial survey is to ensure that HACA's management positions are assigned a pay range at the median (middle) rate of comparable positions within the pool or are tied to another classification internally whose pay range has been assigned through the survey process. The general methodology used to determine this is to take the average percentage difference between the current management class control points and the survey median for comparable classes.

The last management comparability survey was conducted in 2009 so the next comparability review should have occurred in 2012. However, the 2012 survey was not conducted because there was a two-year period of time, from June 2011 until July 2013, where HACA's management salaries were frozen (with the exception of 2-3 managers who were below the control point in their assigned salary range). The salary freeze was due to significant budget constraints experienced in Fiscal Years 2011/12 and 2012/13. Budget constraints continued since then, although modest increases were granted in the years since 2013. However, the subject comparability study will be the first in eight years.

It should be noted that any adjustments to salary ranges resulting from the comparability survey do not automatically increase an employee's salary—increases to salaries are based on the manager's annual performance evaluation.

II. COMPARABILITY STUDY

Staff used an RFP process to contract with the firm of Koff & Associates to conduct a comparability review of the following aspects of the current management compensation plan: (1) salary survey, (2) management fringe benefit survey, and (3) review of the administration of HACA's Pay for Performance plan. A representative from the firm will be present at your meeting to answer questions about the survey.

A. Salary Survey

1. Methodology

For each comparable agency, a "benchmark" classification is selected as the best match to the comparable HACA classification. When evaluating the matches, the actual classification description is studied—the job title is not necessarily the deciding factor. Factors that are also considered are:

- essential duties
- education, certification/licenses
- experience, training, knowledge
- abilities and skills required
- complexity of work
- authority delegated to make decisions and take action
- responsibility for work of others
- program administration
- problem solving/ingenuity
- contacts with others
- consequences of actions and decisions

The objective of the methodology is to analyze each class description according to these factors, requiring that a classification's "likeness" be at approximately 70% of the matched classification to be included.

When there is no appropriate match with one class, "brackets" can be used. A "bracket" is two or more classifications that can be functional or represent a span in scope of responsibility. A functional bracket means that the job of one classification at HACA is performed by two or more classifications at a comparator agency. A "bracket" representing a span in scope means that the comparator agency has one class that is "bigger" in scope and responsibility and one class that is "smaller," where HACA's class falls in the middle. Four matches per benchmark are required in order to perform a statistical analysis on the market data obtained.

Since compensation systems are continually changing, the salary survey that was performed by Koff & Associates represents a “snapshot in time” and reflects the comparator salaries as of March 15, 2017.

Three calculations were performed to compare HACA’s management classifications with each benchmark:

- **Average:** Represents the average of all of the matches, excluding HACA. The average equals the sum of all of salaries divided by the number of matches. There is an average for the published salary data as well as the geographically adjusted data.
- **Median:** Represents the true midpoint of the matches. In other words, half of the salaries fall above and half of the salaries fall below the median. If there is an even number of matches, then the median is the average of the two middle salaries. There is a median for the published salary data as well as the geographically adjusted data.
- **The % above or below HACA** is compared to the average(s) and the median(s) (is) (are) also shown.

2. Salary Survey Results

Fifteen management classifications were surveyed:

1. Accountant
2. Administrative Analyst
3. Deputy Director (not filled)
4. Executive Assistant
5. Executive Director
6. Facilities Manager
7. Finance Director
8. Human Resources Manager
9. IT Manager (budgeted thru 12/31/17)
10. Procurement Manager
11. Programs Manager
12. Senior Accountant (not filled)
13. Senior Administrative Analyst
14. Special Programs Manager
15. Systems Manager

As indicated in the attached analysis, all but one classification (Senior Accountant) fell below the market median. The Senior Accountant is a newly-created classification for HACA; therefore, there was no HACA salary against which to compare the survey results. Based on the salary survey results, recommendations have been made to adjust the management classifications into salary ranges in the HACA salary range table that correspond to the market median salary for each classification.

Koff & Associates has recommended using a phased approach in order to make adjustments to bring current salaries into alignment with the market median. One model of a phased approach is to implement adjustments over a three year period depending on the degree of disparity, as shown below. The Executive Director will work with HACA managers to determine a fair and affordable approach.

Three-Year Implementation Proposal

Market Disparity	% Increase
0 to 4.99%	0 to 2.49%
5.0% to 9.99%	2.5% to 4.99%
10.0% to 14.99%	5.0% to 7.49%
15.0% to 19.99%	7.5% to 9.99%
20.0% and above	10.0%

B. Management Fringe Benefit Survey

In addition to salaries, Koff & Associates performed a comparability survey focusing on three common fringe benefits: (1) management leave, (2) vacation accrual rates for management employees, and (3) life and AD&D insurance benefits for management employees.

1. Methodology

The management fringe benefit survey included a comparability study utilizing the same established group of comparable agencies as indicated above in the salary survey methodology.

2. Fringe Benefit Survey Results

The following table summarizes the results that were provided regarding management leave and life and accidental, death and dismemberment (AD&D) insurance benefits:

COMP AGENCY	MANAGEMENT LEAVE	LIFE INSURANCE/AD&D
City of Fremont	Based on years of service: 0-10 yrs = 112 hrs; 11+ yrs = 124 hrs per year	\$100,000 (non-mgmt = \$50K)
City of Hayward	80 hours per year	1x annual salary
City of San Leandro	80 hours per year; dept heads 120 hours per year	None indicated
City of San Mateo	48 hours per year	None indicated
County of Alameda	Still waiting for info	Still waiting for info
Richmond PHA	88 hours per year	2x annual salary up to \$250K
Contra Costa Co. PHA	60 hours	\$40K for exempt employees; \$50K for Exec Dir.
City of Alameda PHA	Still waiting for info	Still waiting for info
Santa Clara Co. PHA	Based on salary grade: grades 12-17 = 40 hrs; Grades 18+ = 80 hours	None indicated
Marin Co. PHA	40 hours	1x annual salary + \$10,000 for mgmt 2x annual salary + \$10,000 for senior mgmt.
Oakland PHA	40 hours	None indicated
San Mateo Co. PHA	130 hours	\$50,000
HACA	None	\$50,000

C. Pay for Performance Plan

HACA has an established range system that allows for movement through the salary range based on performance. The ranges have a minimum, a control point (approximately mid-range) and a maximum. The method that was originally set up for HACA's management Pay for Performance plan used the control point as the point in the range where employees would end the progression within the range. Once the control point within the salary range was achieved, an employee would receive a

“bonus” for excellent performance for any future increases based on performance. However, there was no further movement within the range from the control point to the maximum of the range. In practice, the current HACA Pay for Performance plan does not utilize the full salary range and stops at the control point.

Data was collected on the performance management programs implemented, if any, at the comparator agencies/jurisdictions. Some comparators use a step salary range structure for all classifications, whereby movement through the range was primarily based on time-in-step. For those like HACA, where open range structures are utilized, employees advanced through the salary range based on performance and time – because performance evaluations are typically administered annually. It is important to note that none of the comparator agencies use a control point.

Based on the market data for pay for performance plans, Koff & Associates recommends that HACA revise how salary structure adjustments and merit-based pay are implemented. The study found that employee salaries are adjusted based on performance as base-building pay adjustments and not as bonuses (unless at or above the maximum of the range and is performance-based). Recommendations also include utilizing the salary range from the control point to the maximum for those employees whose performance over time consistently exceeds expectations as defined by HACA’s core competencies and individual goal achievement.

RECOMMENDATION

Staff recommends your Commission accept the findings contained in the survey of comparable agencies/jurisdictions regarding management salaries, fringe benefits and administration of the Pay for Performance plan. The Executive Director will work with HACA managers to agree on an approach and timeline to implement the survey findings and will come back to your Commission with proposed recommendations based on the survey. The proposed actions will take into consideration HACA’s ability to implement any proposed changes given what is happening at the federal budget level.

In addition to accepting the results of the current survey findings and directing staff to come back with proposed actions to address the survey results, it has been your Commission’s past practice to direct staff to continue the Management Compensation Policy going forward. Therefore, staff requests authorization for the following:

1. Accept the range assignment recommendations retroactive to the first pay period of the current fiscal year;

HACA AGENDA ITEM NO.: 6-8.

2. Continue to survey management classifications and re-determine range assignments every three years;
3. Continue using the median (mid-point) of the total compensation survey or internal relationships to surveyed classes to assign salaries to ranges;
4. Continue the practice of annually surveying the cost of living adjustments (COLAs) granted to management employees of public agencies/jurisdictions in the comparability pool and applying the mean (average) of the COLAs to HACA managers' pay ranges and salaries.

Appendix IV
Housing Authority of the County of Alameda
Proposed Range Placement Recommendations
March 2017

Exhibit 1

Class Title	Current Control Point Monthly Salary	Market Placement	Proposed Salary Range	Proposed Control Point Monthly Salary	Percent Difference	Rationale
Accountant	\$7,724	\$7,395	27	\$7,919	2.52%	Market and internal alignment: 15% below Senior Accountant.
Administrative Analyst	\$7,353	\$7,631	27	\$7,919	7.70%	Market and internal alignment: 15% below Senior Administrative Analyst.
Contracts and Procurement Manager	\$6,824	\$8,459	30	\$8,523	24.90%	Market and range placement.
Deputy Director	\$12,348	\$11,283	47	\$12,974	5.07%	Market and internal alignment: 15% above Programs Manager.
Executive Assistant	\$6,340	\$6,538	19	\$6,498	2.49%	Market and range placement.
Executive Director	\$15,045	\$16,257	56	\$16,202	7.69%	Market and range placement.
Facilities Manager	\$8,955	\$9,478	34	\$9,412	5.10%	Market and range placement.
Finance Director	\$11,753	\$12,123	45	\$12,348	5.06%	Market and internal alignment: 5% below Deputy Director.
Human Resources Manager	\$7,919	\$10,247	37	\$10,135	27.98%	Market and range placement.
Information Technology Manager	\$11,186	\$11,305	41	\$11,186	0.00%	Market and range placement.
Programs Manager	\$10,646	\$11,142	41	\$11,186	5.07%	Market and range placement.
Senior Accountant	Proposed	\$8,519	33	\$9,178	N/A	Market and internal alignment: anchor to Senior Administrative Analyst.
Senior Administrative Analyst	\$8,741	\$9,075	33	\$9,178	5.00%	Market and range placement.
Special Programs Manager	\$9,412	\$10,124	37	\$10,135	7.68%	Market and range placement.
Systems Manager	\$8,114	\$9,825	36	\$9,887	21.85%	Market and range placement.

Legend for columns:

Column 1 - Classification Title.

Column 2 - Client's current monthly maximum salaries.

Column 3 - Market placement shows the monthly market values derived from the base salary survey results.

Column 4 - Salary range number of the consultant's newly proposed salary range schedule.

Column 5 - Monthly maximum salary of the consultant's newly proposed salary ranges.

Column 6 - This percentage expresses the difference between the client's current salaries and the consultant's proposed salaries.

Column 7 - The rationale expresses how the consultant arrived at each proposed maximum monthly salary recommendation (i.e., the proposed range placement within the newly proposed salary range schedule).

Appendix I
Housing Authority of the County of Alameda
Results Summary
March 2017

Exhibit 2

Classification	# of Matches	Top Monthly Salary Data				
		HACA Control Point Salary	Market Average	% HACA above or below	Market Median	% HACA above or below
Accountant	12	\$7,724	\$7,365	4.6%	\$7,395	4.3%
Administrative Analyst	9	\$7,353	\$7,356	0.0%	\$7,631	-3.8%
Contracts and Procurement Manager	8	\$6,824	\$8,409	-23.2%	\$8,459	-24.0%
Deputy Director for Programs	7	\$12,348	\$12,477	-1.0%	\$11,283	8.6%
Executive Assistant	11	\$6,340	\$6,475	-2.1%	\$6,538	-3.1%
Executive Director	7	\$15,045	\$17,329	-15.2%	\$16,257	-8.1%
Facilities Manager	8	\$8,955	\$9,327	-4.2%	\$9,478	-5.8%
Finance Director	12	\$11,753	\$12,312	-4.8%	\$12,123	-3.1%
Human Resources Manager	9	\$7,919	\$10,462	-32.1%	\$10,247	-29.4%
Information Technology Manager	7	\$11,186	\$11,896	-6.3%	\$11,305	-1.1%
Programs Manager	8	\$10,646	\$10,566	0.8%	\$11,142	-4.7%
Senior Accountant	9	Proposed	\$8,457	N/A	\$8,519	N/A
Senior Administrative Analyst	10	\$8,741	\$8,724	0.2%	\$9,075	-3.8%
Special Programs Manager	6	\$9,412	\$9,889	-5.1%	\$10,124	-7.6%
Systems Manager	9	\$8,114	\$9,827	-21.1%	\$9,825	-21.1%

AVERAGE:

-7.8%

AVERAGE:

-7.3%

MEDIAN:

-4.5%

MEDIAN:

-4.2%

ISD = Insufficient Data to do Analysis

HOUSING AUTHORITY OF THE COUNTY OF ALAMEDA

AGENDA STATEMENT

Meeting: July 26, 2017

Subject: HUD Funding Shortfall – Update on Action Plan

Exhibits: None

Recommendation: Receive Report

BACKGROUND

At your April 2017 meeting staff provided you with an update on HACA's Section 8 funding shortfall. The three contributing factors to this shortfall are: 1) the method HUD uses to calculate the amount of funding for housing authorities, 2) the federal FY 2017 budget provides only 97 percent of the HAP amount needed to keep all Section 8 tenants housed, and 3) the exceedingly high rents in our area. Staff further explained that HUD's resolution is to have shortfall housing authorities reduce their HAP costs as much as possible before funding the shortfall and, jointly with the housing authority, develop an Action Plan to accomplish this.

At your May 2017 meeting staff told you that HUD issued Notice PIH 2017-07, providing guidance related to eligibility for shortfall funding in calendar year 2017. Staff also provided you with an update of the required actions outlined in HACA's initial Action Plan from HUD and the requirements of HUD Notice PIH 2017-07.

At your June 2017 meeting staff reported that we had sent a letter to all Section 8 participants encouraging them to correctly report their income and the number of persons in their households. We also requested authorization to submit an application to HUD for shortfall funds, should the application be due before your next meeting.

DISCUSSION and ANALYSIS

Staff continues to have a monthly conference call with HUD's Shortfall Prevention Team and we continue to review HUD-provided reports for cost savings. On each call we jointly complete and agree on certain data to be inserted on HUD's Two-Year Tool, which projects the amount of the shortfall.

HACA AGENDA ITEM NO.: 6-9.

Additionally, staff sent a letter to 160 participants who pay 60 percent or more of their income towards their portion of the rent in order to determine if further cost savings could be realized. We have received 46 responses to date and are in the process of reviewing them.

On June 28, 2017, HUD issued a notice allowing us to apply for shortfall funding. The application consisted of a simple two-page certification. Staff submitted our application on July 6, 2017, and is awaiting HUD's response.

BUDGET STATUS **REPORT**

Housing Authority of Alameda County
HOUSING CHOICE VOUCHER
Administrative Budget Status Report FYE June 30, 2017
May 2017

FY 2017 - HCV OPERATING BUDGET	Budgeted @ 5/31/2017	Actual @ 5/31/2017	OVER (UNDER)	PROJECTED TO 6/30/17	SCH. NO.	2016 BUDGET	2017 BUDGET	DIFFERENCE
INCOME								
Investment Income	459	0	(459)	0	A1	735	500	(235)
Misc. Income	298,833	443,240	144,406	485,210	A1	323,698	326,000	2,302
Administrative Fee Income	6,394,882	6,233,277	(161,605)	6,787,083	A	6,447,189	6,976,234	529,045
TOTAL INCOME	6,694,173	6,676,516	(17,657)	7,272,294		6,771,622	7,302,735	531,113
EXPENSES								
Administration								
Salaries	(3,768,173)	(3,321,005)	447,168	(3,754,179)	B-1& 2	(3,794,397)	(4,110,734)	(316,337)
Other Admin.	(1,433,445)	(1,254,404)	179,040	(1,493,183)	C-1&2	(1,538,303)	(1,563,758)	(25,455)
Total	(5,201,617)	(4,575,409)	626,208	(5,247,362)		(5,332,700)	(5,674,492)	(341,791)
General								
Insurance	(207,560)	(195,054)	12,506	(212,786)	E	(203,970)	(226,429)	(22,459)
Employee Benefits	(2,053,654)	(1,897,020)	156,634	(2,232,300)		(2,124,862)	(2,240,350)	(115,488)
Miscellaneous	0	0	0	0		0	0	0
Total	(2,261,214)	(2,092,074)	169,140	(2,445,086)		(2,328,832)	(2,466,779)	(137,947)
Total Routine Expenses	(7,462,832)	(6,667,483)	795,349	(7,692,448)		(7,661,532)	(8,141,271)	(479,739)
Capital Expenditures	0	0	0	0	D2	0	0	0
TOTAL EXPENSES	(7,462,832)	(6,667,483)	795,349	(7,692,448)		(7,661,532)	(8,141,271)	(479,739)
NET INCOME (DEFICIT)	(768,658)	9,033	777,692	(420,154)		(889,910)	(838,536)	51,374

Unrestricted Net Position @ 6/30/16 (Unaudited)

\$ (5,223,545)

Projected Income (Deficit) @ 6/30/17

(420,154)

Projected Unrestricted Net Position @ 6/30/17

\$ (5,643,699)

PROGRAM ACTIVITY

REPORT

HOUSING AUTHORITY OF THE COUNTY OF ALAMEDA

AGENDA STATEMENT

Meeting: July 26, 2017

Subject: Programs Activity Report

Exhibits Attached: Section 8 and Housing Assistance Payments (HAP) Report; Section 8 Average Contract Rent Report; Fraud Payments Report; Landlord Rental Listing Report; FSS Program Monthly Report

Recommendation: Receive Report

Financial Statement: None

SECTION 8 HOUSING CHOICE VOUCHERS

- **Lease-Up:** As of July 1, 2017, the Section 8 Housing Choice Voucher program had 6,253 units under contract. The fiscal year-to-date lease-up average is 96.93% units as of July 1, 2017. The budget authority use average through May 2017 is 112%.
- **Program Utilization:** As of July 1, 2017, the average HAP subsidy was \$1,449 and the average tenant-paid rent portion was \$465 for an average Contract Rent of \$1,913. Amounts vary by \$1 due to rounding.
 - ❖ As of July 1, 2017, HACA had 80 outgoing billed portability contracts (i.e., HACA voucher holders who are housed in another housing authority's jurisdiction).
 - ❖ As of July 1, 2017, HACA billed other housing authorities for 180 incoming portability contracts.
 - ❖ 226 of PACH's 230 project-based voucher (PBV) units are leased. These are HACA's former public housing units converted under HUD's Section 18 or Rental Assistance Demonstration programs and transferred to PACH, HACA's instrumentality.
- **Section 8 Contract Report:** A copy of the Contract Report is attached.
- **Fraud / Debt Recovery:** HACA retained \$10,237.43 for the month of June. A total of \$206,293.60 was retained over this fiscal year.

- **Landlord Rental Listings:** As of July 5, 2017, there were 834 landlords with properties in HACA's jurisdiction utilizing the *GoSection8* rental listing service. There were four new landlords added to the Section 8 program in June. There were 25 active properties listed as of July 5, 2017.
- **Housing Quality Standards (HQS) Abatements:** During the second quarter of 2017 HACA inspected 1,012 units. Of those, 687 (68%) passed inspection the day they were inspected, 243 (24%) later passed inspection after making the required repairs, and the remainder (9%) are in process either to pass or be abated. The average number of days it took a failed unit to pass inspection was 18. Additionally, HACA abated 10 HAP contracts for non-compliance with HQS.

FAMILY SELF SUFFICIENCY (FSS)

In June, the FSS Department held a round table discussion where FSS program participants were engaged in rediscovering, redefining, realigning, or redesigning the best version of themselves. The discussion was well received with 15 participants.

The FSS Department hosted a quarterly Program Coordinating Committee (PCC) meeting where Alameda County agencies, non-profit organizations and FSS participants provide program updates regarding their respective agencies and share valuable information.

HOUSING AUTHORITY OF THE COUNTY OF ALAMEDA
Section 8 Contract and HAP Report for the Month of June 2017

	Certificates		Vouchers		JUNE 2017 TOTAL			
City	Number	HAP*	Number	HAP**	Number	HAP	JUNE 2016	JUNE 2015
Albany	0	\$0	23	\$32,982	23	\$32,982	26	27
Castro Valley	11	\$13,486	201	\$288,234	212	\$301,720	208	210
Dublin	3	\$3,678	352	\$504,768	355	\$508,446	355	357
Emeryville	5	\$6,130	148	\$212,232	153	\$218,362	156	130
Fremont	21	\$25,746	1,050	\$1,505,700	1,071	\$1,531,446	1,055	1,079
Hayward	87	\$106,662	1,922	\$2,756,148	2,009	\$2,862,810	1,983	2,060
Newark	6	\$7,356	204	\$292,536	210	\$299,892	217	225
Pleasanton	3	\$3,678	172	\$246,648	175	\$250,326	112	110
San Leandro	14	\$17,164	1,385	\$1,986,090	1,399	\$2,003,254	1,441	1,470
San Lorenzo	1	\$1,226	203	\$291,102	204	\$292,328	191	198
Union City	3	\$3,678	733	\$1,051,122	736	\$1,054,800	739	743
TOTALS	154	\$188,804	6,393	\$9,167,562	6,547	\$9,356,366	6,483	6,609

**Based on an average June Housing Assistance Payment (HAP) of \$1,226 per voucher contract*

***Based on an average June Housing Assistance Payment (HAP) of \$1,434 per voucher contract*

HOUSING AUTHORITY OF THE COUNTY OF ALAMEDA
Section 8 Average Contract Rent Report for the Month of June 2017

City	Number of HAP Contracts	Average Contract Rent	Average HAP Paid by HACA	Average Rent Paid by Family	Average Family-Paid Rent as a Percentage of Average Contract Rent
Albany	22	\$1,542	\$1,264	\$278	18%
Castro Valley	183	\$1,858	\$1,435	\$423	23%
Dublin	272	\$1,963	\$1,533	\$430	22%
Emeryville	110	\$1,726	\$1,237	\$489	28%
Fremont	992	\$2,053	\$1,578	\$475	23%
Hayward	1,860	\$1,814	\$1,362	\$452	25%
Newark	206	\$2,302	\$1,717	\$585	25%
Pleasanton	168	\$1,628	\$1,260	\$368	23%
San Leandro	1,386	\$1,823	\$1,348	\$475	26%
San Lorenzo	203	\$2,130	\$1,626	\$505	24%
Union City	510	\$2,201	\$1,675	\$525	24%

*Some rents may vary by \$1 due to rounding

DEBT COLLECTIONS

2016-2017

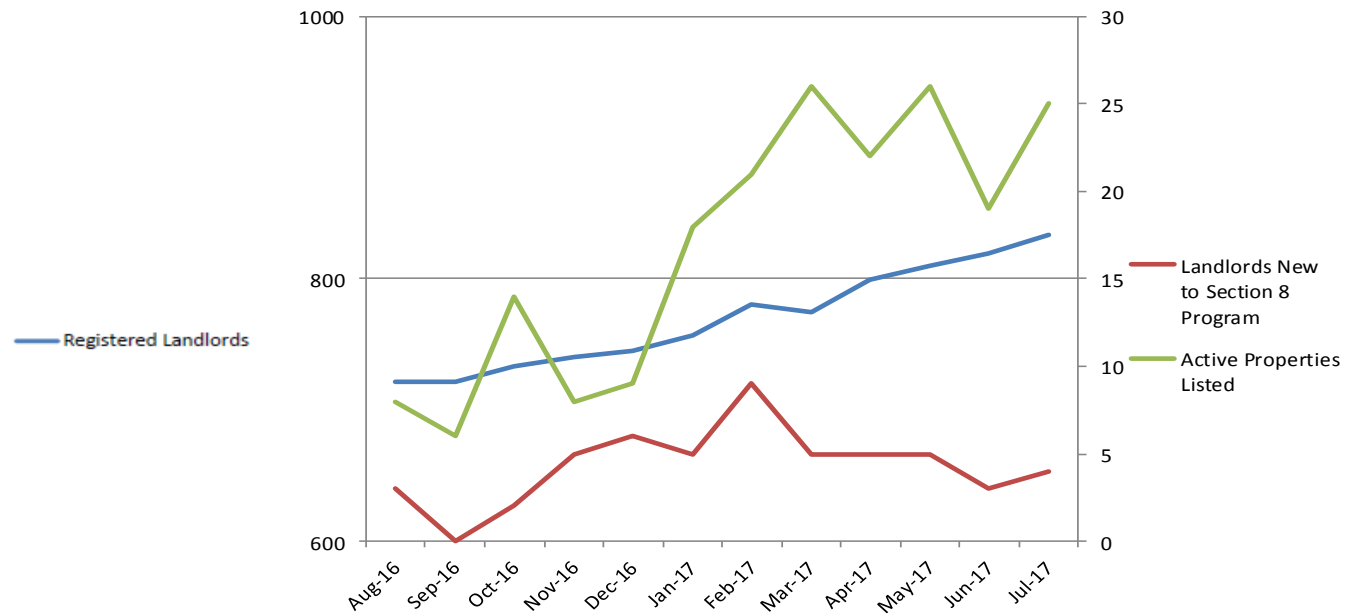
FYE 06/30/17

	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	JANUARY '17	FEBRUARY	MARCH	APRIL	MAY	JUNE	GRAND TOTALS
<i>DAMAGE CLAIMS</i>	\$0.00	\$408.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$408.00
<i>FRAUD REPAYMENTS</i>	\$3,786.89	\$10,046.44	\$11,177.70	\$15,073.00	\$10,643.05	\$9,952.98	\$11,546.31	\$7,569.73	\$7,589.24	\$91,341.98	\$16,920.85	\$10,237.43	\$205,885.60
TOTALS	\$3,786.89	\$10,454.44	\$11,177.70	\$15,073.00	\$10,643.05	\$9,952.98	\$11,546.31	\$7,569.73	\$7,589.24	\$91,341.98	\$16,920.85	\$10,237.43	\$206,293.60

Landlord Rental Listing Report

Monthly

	8/1/2016	9/1/2016	10/3/2016	11/1/2016	12/1/2016	1/3/2017	2/1/2017	3/1/2017	4/3/2017	5/1/2017	6/1/2017	7/5/2017
Registered Landlords	722	722	733	740	745	757	780	775	799	810	819	834
Landlords New to Section 8 Program	3	0	2	5	6	5	9	5	5	5	3	4
Active Properties Listed	8	6	14	8	9	18	21	26	22	26	19	25





To: Christine Gouig, Executive Director
From: Daniel Taylor, Special Programs Manager
Re: **FSS Program Summary**
CC: Linda Evans, Phyllis Harrison, Mary Sturges, Danielle Roundtree
Date: July 3, 2017

Program Summary	June 2017
Total Clients Under Contract:	156
MDRC:	100
Graduates:	1
Escrow Disbursed:	\$25,595.20
Ports In:	1
Ports Out:	0
Terminations:	0
New Contracts:	1

FSS PROGRAM NEWS:

Program Coordinating Committee (PCC)

On Wednesday, June 14, 2017, the FSS team hosted a Program Coordinating Committee (PCC) meeting. The PCC consists of Alameda County agencies, non-profit organizations and FSS participants and its purpose is to offer guidance and strengthen our FSS program. The PCC members provided program updates regarding their respective agencies and shared valuable information. The meetings are held quarterly, and the next PCC meeting is scheduled for September 20, 2017.

FSS Workshop

On Tuesday, June 20, 2017, Gloria Brown, Life Coach, held a round table discussion session entitled, *Enter the Empowerment Zone: Discover the Best Version of You!* FSS participants were engaged in rediscovering, redefining, realigning, or redesigning the best version of themselves—in order to live a life of joy, fulfillment, and bliss. Fifteen FSS participants were in attendance. Ms. Brown's workshops are always very well-received.

Case Management Referrals = 26
Job Lead Referrals = 107

ATTACHMENT A

PART II: BASIC ELIGIBILITY CRITERIA

3-II.A. INCOME ELIGIBILITY AND TARGETING

Income Limits

HUD establishes income limits for all areas of the country and publishes them annually in the *Federal Register*. They are based upon estimates of median family income with adjustments for family size. The income limits are used to determine eligibility for the program and for income targeting purposes as discussed in this section.

Definitions of the Income Limits [24 CFR 5.603(b)]

Low-income family. A family whose annual income does not exceed 80 percent of the median income for the area, adjusted for family size.

Very low-income family. A family whose annual income does not exceed 50 percent of the median income for the area, adjusted for family size.

Extremely low-income family. A very low-income family whose annual income does not exceed the higher of the Federal poverty level or 30 percent of the median income for the area.

Area median income is determined by HUD, with adjustments for smaller and larger families. HUD may establish income ceilings higher or lower than 30, 50, or 80 percent of the median income for an area if HUD finds that such variations are necessary because of unusually high or low family incomes.

Using Income Limits for Eligibility [24 CFR 982.201]

Income limits are used for eligibility only at admission. Income eligibility is determined by comparing the annual income of an applicant to the applicable income limit for the applicant's family size. In order to be income eligible, an applicant family must be one of the following:

- A *very low-income* family
- A *low-income* family that has been "continuously assisted" under the 1937 Housing Act. A family is considered to be continuously assisted if the family is already receiving assistance under any 1937 Housing Act program at the time the family is admitted to the HCV program [24 CFR 982.4]

HACA Policy

HACA will consider a family to be continuously assisted if the family was leasing a unit under any 1937 Housing Act program at the time it was ~~selected from~~issued a voucher by HACA's waiting list.

- A low-income family that qualifies for voucher assistance as a non-purchasing household living in HOPE 1 (public housing homeownership), HOPE 2 (multifamily housing homeownership) developments, or other HUD-assisted multifamily homeownership programs covered by 24 CFR 248.173

Independent Student

HACA Policy

HACA will consider a student “independent” from his or her parents and the parents’ income will not be considered when determining the student’s eligibility if the following four criteria are all met:

The individual is of legal contract age under state law.

The individual has established a household separate from his/her parents for at least one year prior to application for occupancy or the individual meets the U.S. Department of Education’s definition of independent student.

To be considered an *independent student* according to the Department of Education, a student must meet one or more of the following criteria:

~~Be~~The individual is at least 24 years old by December 31 of the award year for which aid is sought

~~Be~~The individual is an orphan, in foster care, or a ward of the court, ~~through the age of 18~~or was an orphan, in foster care, or ward of the court at any time when the individual was 13 years of age or older

The individual is, or was immediately prior to attaining the age of majority, an emancipated minor or in legal guardianship as determined by a court of competent jurisdiction in the individual’s state of legal residence

~~Be~~The individual is a veteran of the U.S. Armed Forces or is currently serving on active duty in the Armed Forces for other than training purposes

~~Have one or more legal dependents other than a spouse (for example, dependent children or an elderly dependent parent)~~

~~Be~~The individual is a graduate or professional student

~~Be~~The individual is married

The individual has one or more legal dependents other than a spouse (for example, dependent children or an elderly dependent parent)

The individual has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting by:

A local educational agency homeless liaison

The director of a program funded under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act or a designee of the director

A financial aid administrator

The individual is a student for whom a financial aid administrator makes a documented determination of independence by reason of other unusual circumstances

The individual was not claimed as a dependent by his/her parents pursuant to IRS regulations, as demonstrated on the parents' most recent tax forms.

The individual provides a certification of the amount of financial assistance that will be provided by his/her parents. This certification must be signed by the individual providing the support and must be submitted even if no assistance is being provided.

If the PHA determines that an individual meets the definition of a *vulnerable youth*, such a determination is all that is necessary to determine that the person is an *independent student* for the purposes of using only the student's income for determining eligibility for assistance.

HACA will verify that a student meets the above criteria in accordance with the policies in Section 7-II.E.

Institution of Higher Education

HACA will use the statutory definition under section 102 of the Higher Education Act of 1965 to determine whether a student is attending an *institution of higher education* (see Exhibit 3-2).

Parents

HACA Policy

For purposes of student eligibility restrictions, the definition of *parents* includes biological or adoptive parents, stepparents (as long as they are currently married to the biological or adoptive parent), and guardians (e.g., grandparents, aunt/uncle, godparents, etc).

Person with Disabilities

The PHA will use the statutory definition under section 3(b)(3)(E) of the 1937 Act to determine whether a student is a *person with disabilities* (see Exhibit 3-1).

Veteran

HACA Policy

A *veteran* is a person who served in the active military, naval, or air service and who was discharged or released from such service under conditions other than dishonorable.

Vulnerable Youth

HACA Policy

A vulnerable youth is an individual who meets the U.S. Department of Education's definition of independent student in paragraphs (b), (c), or (h), as adopted in Section II of FR Notice 9/21/16:

The individual is an orphan, in foster care, or a ward of the court, or was an orphan, in foster care, or ward of the court at any time when the individual was 13 years of age or older

The individual is, or was immediately prior to attaining the age of majority, an emancipated minor or in legal guardianship as determined by a court of competent jurisdiction in the individual's state of legal residence

The individual has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting by:

A local educational agency homeless liaison

The director of a program funded under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act or a designee of the director

A financial aid administrator

Determining Student Eligibility

If a student is applying for assistance on his/her own, apart from his/her parents, HACA must determine whether the student is subject to the eligibility restrictions contained in 24 CFR 5.612.

6-III.C. APPLYING PAYMENT STANDARDS [24 CFR 982.505; 982.503(b)]

Overview

HACA's schedule of payment standards is used to calculate housing assistance payments for HCV families. This section covers the application of HACA's payment standards. The establishment and revision of HACA's payment standard schedule are covered in Chapter 16.

Payment standard is defined as "the maximum monthly assistance payment for a family assisted in the voucher program (before deducting the total tenant payment by the family)" [24 CFR 982.4(b)].

The payment standard for a family is the lower of (1) the payment standard for the family unit size, which is defined as the appropriate number of bedrooms for the family under HACA's subsidy standards [24 CFR 982.4(b)], or (2) the payment standard for the size of the dwelling unit rented by the family.

If HACA has established an exception payment standard for a designated part of a zip code area or FMR area and a family's unit is located in the exception area, HACA must use the appropriate payment standard for the exception area.

HACA is required to pay a monthly housing assistance payment (HAP) for a family that is the lower of (1) the payment standard for the family minus the family's TTP or (2) the gross rent for the family's unit minus the TTP.

If during the term of the HAP contract for a family's unit, the owner lowers the rent, HACA will recalculate the HAP using the lower of the initial payment standard or the gross rent for the unit [HCV GB, p. 7-8].

Changes in Payment Standards

When HACA revises its payment standards during the term of the HAP contract for a family's unit, it will apply the new payment standards in accordance with HUD regulations.

Decreases

~~If the amount on the payment standard schedule is decreased during the term of the HAP contract as a result of a reduction in the FMR, HACA will continue to use the existing higher payment standard for family subsidy calculations for as long as a family continues to receive voucher assistance in its then current unit. If such a family moves and begins to receive assistance in another unit, HACA will use the lower payment standard beginning at the effective date of the new HAP contract for the unit to which the family has moved.~~

-If the amount on the payment standard schedule is decreased during the term of the HAP contract, the lower payment standard generally will be used beginning at the effective date of the family's second regular reexamination following the effective date of the decrease in the payment standard. HACA will determine the payment standard for the family as follows:

Step 1: At the first regular reexamination following the decrease in the payment standard, HACA will determine the payment standard for the family using the lower of the payment standard for the family unit size or the size of the dwelling unit rented by the family.

Step 2: HACA will compare the payment standard from step 1 to the payment standard last used to calculate the monthly housing assistance payment for the family. The payment standard used by HACA at the first regular reexamination following the decrease in the payment standard will be the higher of these two payment standards. HACA will advise the family that the application of the lower payment standard will be deferred until the second regular reexamination following the effective date of the decrease in the payment standard.

Step 3: At the second regular reexamination following the decrease in the payment standard, the lower payment standard will be used to calculate the monthly housing assistance payment for the family unless HACA has subsequently increased the payment standard, in which case the payment standard will be determined in accordance with procedures for increases in payment standards described below.

Increases

If the payment standard is increased during the term of the HAP contract, the increased payment standard will be used to calculate the monthly housing assistance payment for the family beginning on the effective date of the family's first regular reexamination on or after the effective date of the increase in the payment standard.

Families requiring or requesting interim reexaminations will not have their HAP payments calculated using the higher payment standard until their next annual reexamination [HCV GB, p. 7-8].

Changes in Family Unit Size

Irrespective of any increase or decrease in the payment standard, if the family unit size increases or decreases during the HAP contract term, the new family unit size must be used to determine the payment standard for the family beginning at the family's first regular reexamination following the change in family unit size.

Reasonable Accommodation

If a family requires a higher payment standard as a reasonable accommodation for a family member who is a person with disabilities, HACA is allowed to establish a higher payment standard for the family of not more than 120 percent of the published FMR.

7-II.E. VERIFICATION OF STUDENT STATUS

General Requirements

HACA Policy

HACA requires families to provide information about the student status of all students who are 18 years of age or older. This information will be verified only if:

The family reports full-time student status for an adult other than the head, spouse, or co-head.

The family reports child care expenses to enable a family member to further his or her education.

The family includes a student enrolled in an *institution of higher education*.

Restrictions on Assistance to Students Enrolled in Institutions of Higher Education

This section applies only to students who are seeking assistance on their own, separately from their parents. It does not apply to students residing with parents who are seeking or receiving HCV assistance.

HACA Policy

In accordance with the verification hierarchy described in Section 7-1.B, HACA will determine whether the student is exempt from the restrictions in 24 CFR 5.612 by verifying any one of the following exemption criteria:

The student is enrolled at an educational institution that does not meet the definition of *institution of higher education* in the Higher Education Act of 1965 (see Section Exhibit 3-2).

The student is at least 24 years old.

The student is a veteran, as defined in Section 3-II.E.

The student is married.

The student has at least one dependent child, as defined in Section 3-II.E.

The student is a person with disabilities, as defined in Section 3-II.E, and was receiving assistance prior to November 30, 2005.

If HACA cannot verify at least one of these exemption criteria, HACA will conclude that the student is subject to the restrictions on assistance at 24 CFR 5.612. In addition to verifying the student's income eligibility, HACA will then proceed to verify either the student's parents' income eligibility (see Section 7-III.J) or the student's independence from his/her parents (see below).

Independent Student

HACA Policy

HACA will verify a student's independence from his/her parents to determine that the student's parents' income is not relevant for determining the student's eligibility by doing all of the following:

Either reviewing and verifying previous address information to determine whether the student has established a household separate from his/her parents for at least one year or reviewing and verifying documentation relevant to determining whether the student meets the U.S. Department of Education's definition of *independent student* (see Section 3-II.E)

Reviewing the student's prior year income tax returns to verify the student is independent or verifying the student meets the U.S. Department of Education's definition of *independent student* (see section 3-II.E)~~whether a parent has claimed the student as a dependent~~

Requesting and obtaining written certification directly from the student's parents identifying the amount of support they will be providing to the student, even if the amount of support is \$0, except in cases in which the PHA determines that the student is a *vulnerable youth* (see section 3-II.E):-

8-II.B. INITIAL HQS INSPECTION [24 CFR 982.401(a)]**Initial Inspections [FR Notice 1/18/17]**

The PHA may, but is not required to, approve assisted tenancy and start HAP if the unit fails HQS inspection, but only if the deficiencies identified are non-life-threatening. Further, the PHA may, but is not required to, authorize occupancy if a unit passed an alternative inspection in the last 24 months.

HACA Policy

The unit must pass the HQS inspection on or before the effective date of the HAP contract.

HACA will not rely on alternative inspections and will conduct an HQS inspection for each unit prior to executing a HAP contract with the owner.

Timing of Initial Inspections

~~HUD requires the unit to pass HQS before the effective date of the lease and HAP Contract.~~

HUD requires PHAs with fewer than 1,250 budgeted units to complete the initial inspection, determine whether the unit satisfies HQS, and notify the owner and the family of the determination within 15 days of submission of the Request for Tenancy Approval (RTA). For PHAs with 1,250 or more budgeted units, to the extent practicable such inspection and determination must be completed within 15 days. The 15-day period is suspended for any period during which the unit is not available for inspection [982.305(b)(2)].

HACA Policy

HACA will complete the initial inspection, determine whether the unit satisfies HQS, and notify the owner and the family of the determination within 15 days of submission of the Request for Tenancy Approval (RTA).

Inspection Results and Re-inspectionsHACA Policy

If any HQS violations are identified, the owner will be notified of the deficiencies and be given a time frame to correct them. If requested by the owner, the time frame for correcting the deficiencies may be extended by HACA for good cause. HACA will re-inspect the unit within 5 business days of the date the owner notifies HACA that the required corrections have been made.

If the time period for correcting the deficiencies (or any HACA-approved extension) has elapsed, or the unit fails HQS at the time of the re-inspection, HACA will notify the owner and the family that the unit has been rejected and that the family must search for another unit. HACA may agree to conduct a second re-inspection, for good cause, at the request of the family and owner.

Following a failed re-inspection, the family may submit a new Request for Tenancy Approval after the owner has made repairs, if they are unable to locate another suitable unit provided their voucher has not expired.

10-I.B. RESTRICTIONS ON MOVES

A family's right to move is generally contingent upon the family's compliance with program requirements [24 CFR 982.1(b)(2)]. HUD specifies two conditions under which a PHA may deny a family permission to move and two ways in which a PHA may restrict moves by a family.

Denial of Moves

HUD regulations permit HACA to deny a family permission to move under the following conditions:

Insufficient Funding

~~Per Notice PIH 2012-42, HACA may only deny a request to move to a higher cost unit within HACA's jurisdiction or to a higher cost area in accordance with 24 CFR 982.354(e)(1) if HACA would be unable to avoid terminations of housing choice voucher assistance for current participants during the calendar year in order to remain within its budgetary allocation (including any available HAP reserves) for housing assistance payments. If HACA does determine it is necessary to deny moves to a higher cost unit based on insufficient funding, it must provide written notification to the San Francisco HUD office when it does so as set forth in Notice PIH 2012-42 and Part VIII of Chapter 16 of this Administrative Plan.~~

~~HACA may not deny requests to move, including portability moves, if the subsidy for the new unit is equal to or less than the current subsidy being paid for the family or if the area the family has selected is a lower cost area. A "lower cost area" is defined as an area where the subsidy amount is equal to or lesser than the current subsidy paid because of lower payment standards or less generous subsidy standards (e.g. the receiving PHA issues a 2-bedroom voucher to a family that received a 3-bedroom voucher from the initial PHA).~~

~~HACA may not deny a family's request to move to a higher cost unit or a higher cost area because it wishes to admit additional families from its waiting list into its voucher program, regardless of whether it has unit months available (UMA) to do so. Additionally, HACA may not deny a family's request to move to a higher cost area if the receiving PHA commits to absorb the voucher. If HACA denies a family's request to move, it may not subsequently admit any additional families to its voucher program until the PHA has followed the policy described below.~~

~~If HACA approves a family's request to move then subsequently experiences a funding shortfall, the PHA may only retract the voucher if the family would be allowed to remain in their current unit. If the family cannot remain in the unit, (e.g. family has already vacated the unit or family has already notified the owner of their intent to vacate and the owner has re-let the unit to another family) the PHA must not retract the voucher. This requirement applies to moves both within the PHA's jurisdiction and to portability moves.~~

HACA Policy

~~If HACA denies a family permission to move on grounds that HACA does not have sufficient funding for continued assistance, HACA will so individually notify the family in writing at the time the move is denied. The family's request to move will remain open for HACA's consideration for 3 months from the family's request. HACA will notify a family with an open request in writing if and when HACA determines that it has~~

~~sufficient funds to allow the move. This policy applies to moves within HACA's jurisdiction as well as to moves outside it under portability.~~

The PHA may deny a family permission to move either within or outside the PHA's jurisdiction if the PHA does not have sufficient funding for continued assistance [24 CFR 982.354(e)(1)]. However, Notice PIH 2016-092-42 significantly restricts the ability of PHAs to deny permission to move due to insufficient funding and places further requirements on PHAs regarding moves denied due to lack of funding. The requirements found in this notice are mandatory.

HACA Policy

HACA will deny a family permission to move on grounds that HACA does not have sufficient funding for continued assistance if (a) the move is initiated by the family, not the owner or HACA; (b) HACA can demonstrate that the move will, in fact, result in higher subsidy costs; and (c) HACA can demonstrate, in accordance with the policies in Part VIII of Chapter 16, that it does not have sufficient funding in its annual budget to accommodate the higher subsidy costs; and (d) for portability moves, the receiving PHA is not absorbing the voucher.

If HACA does not have sufficient funding for continued assistance, but the family must move from their unit (e.g., the unit failed HQS), the family may move to a higher cost unit if the move is within HACA's jurisdiction. HACA, however, will not allow the family to move under portability in this situation if the family wishes to move to a higher cost area.

For both moves within HACA's jurisdiction and outside under portability, HACA will not deny a move due to insufficient funding if HACA previously approved the move and subsequently experienced a funding shortfall if the family cannot remain in their current unit. HACA will rescind the voucher in this situation if the family will be allowed to remain in their current unit.

HACA will create a list of families whose moves have been denied due to insufficient funding. HACA will keep the family's request open indefinitely, and ~~W~~when funds become available, the families on this list will take precedence over families on the waiting list. HACA will use the same procedures for notifying families with open requests to move when funds become available as it uses for notifying families on the waiting list (see section 4-III.D).

HACA will inform the family of its policy regarding moves denied due to insufficient funding in a letter to the family at the time the move is denied.

Grounds for Denial or Termination of Assistance

HACA has grounds for denying or terminating the family's assistance [24 CFR 982.354(e)(2)]. VAWA allows exceptions to these grounds for denial or termination of assistance for families who are otherwise in compliance with program obligations, but have moved to protect the health or safety of an individual who is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and who reasonably believed he or she was imminently threatened by harm from further violence if they remained in the unit. [Pub.L. 109-162]

HACPHA Policy

Briefing

The regulations and policies on briefings set forth in Chapter 5 of this plan require HACA to provide information on portability to all applicant families that qualify to lease a unit outside HACA's jurisdiction under the portability procedures. Therefore, no special briefing is required for these families.

HACA Policy

No formal briefing will be required for a participant family wishing to move outside of HACA's jurisdiction under portability. However, HACA will provide the family with the same oral and written explanation of portability that it provides to applicant families selected for admission to the program (see Chapter 5).

HACA will provide the name, address, and phone of the portability contact person for the PHA in the jurisdiction to which the family wishes to move. If there is more than one PHA with jurisdiction over the area to which the family wishes to move, HACA will advise the family that the family ~~must~~ select the receiving PHA and notify the initial PHA of which receiving PHA was selected. HACA will provide the family with contact information for all of the receiving PHAs that serve the area. HACA will not provide any additional information about receiving PHAs in the area. HACA will further inform the family that if the family prefers not to select the receiving PHA, HACA will select the receiving PHA on behalf of the family. In this case, HACA will not provide the family with information for all receiving PHAs in the area.

HACA will advise the family that it will be under the receiving PHA's policies and procedures, including screening, subsidy standards, voucher extension of the receiving PHA's voucher, and payment standards.

Initial Billing Deadline [Notice PIH 2016-092-42, Letter to Executive Directors, 9/15/15]

The deadline for submission of initial billing is 90 days following the expiration date of the voucher issued to the family by the initial PHA. In cases where suspension of the voucher delays the initial billing submission, the receiving PHA must notify the initial PHA of delayed billing before the billing deadline and document the delay is due to the suspension. In this case, the initial PHA must extend the billing deadline by 30 days.

If the initial PHA does not receive a billing notice by the deadline and does not intend to honor a late billing submission, it must notify the receiving PHA in writing. ~~contact the receiving PHA to determine the status of the family. If the receiving PHA reports that the family is not yet under HAP contract, the initial PHA may inform the receiving PHA that they will not accept any subsequent billing on behalf of the family. Once the initial PHA has so notified the receiving PHA, the initial PHA is not required to honor any billing notice received after the billing deadline. If the initial PHA still subsequently receives a late billing notice on behalf of the family, it simply returns the late Form HUD-52665 to the receiving PHA, and the receiving PHA must absorb the family. If the receiving PHA reports that the family is under HAP contract and the receiving PHA cannot absorb the family when the initial PHA contacts the receiving PHA to determine the status of the family, the initial PHA is required to accept the subsequent late billing; however, it-~~ The initial PHA may report to HUD the receiving PHA's failure to comply with the deadline.

If the initial PHA will honor the late billing, no action is required.

HACA Policy

If HACA has not received an initial billing notice from the receiving PHA within the billing deadline, 90 days of expiration of the IHA's voucher it will contact the receiving PHA to by phone, fax, or e-mail within 10 business days. ~~If the PHA fails to respond within 10 business days of HACA's contact or attempted contact, or reports that the family is not yet under HAP contract, HACA will~~ inform them the receiving PHA that it will not honor a late billing submission and will return any subsequent billings that it receives on behalf of the family. Within 10 business days, HACA will send the receiving PHA a written confirmation of its decision by mail.

HACA will not inform the receiving PHA that it will not honor a late billing submission if the family includes a person with disabilities and the late billing is a result of a reasonable accommodation granted to the family by the receiving PHA.

Monthly Billing Payments [24 CFR 982.355(e), Notice PIH 2016-092-42]

If the receiving PHA is administering the family's voucher, the receiving PHA bills the initial PHA for housing assistance payments and administrative fees. When reimbursing for administrative fees, the initial PHA must promptly reimburse the receiving PHA for the lesser of 80 percent of the initial PHA ongoing administrative fee or 100 percent of the receiving PHA's ongoing administrative fee for each program unit under contract on the first day of the month for which the receiving PHA is billing the initial PHA under portability. If the administrative fees are prorated for the HCV program, the proration will apply to the amount of the administrative fee for which the receiving PHA may bill [24 CFR 982.355(e)(2)].

The initial PHA is responsible for making billing payments in a timely manner. The first billing amount is due within 30 calendar days after the initial PHA receives Part II of form HUD-52665 from the receiving PHA. Subsequent payments must be **received** by the receiving PHA no later than the fifth business day of each month. The payments must be provided in a form and manner that the receiving PHA is able and willing to accept.

The initial PHA may not terminate or delay making payments under existing portability billing arrangements as a result of overleasing or funding shortfalls. The PHA must manage its tenant-based program in a manner that ensures that it has the financial ability to provide assistance for families that move out of its jurisdiction under portability and are not absorbed by receiving PHAs as well as for families that remain within its jurisdiction.

HACA Policy

When available, HACA will utilize direct deposit to ensure that the payment is received by the deadline unless the receiving PHA notifies HACA that direct deposit is not acceptable to them. If the initial PHA extends the term of the voucher, the receiving PHA's voucher will expire 30 calendar days from the new expiration date of the initial PHA's voucher.

Voucher Issuance

When a family moves into its jurisdiction under portability, the receiving PHA is required to issue the family a voucher [24 CFR 982.355(c)(13)]. The family must submit a request for tenancy approval to the receiving PHA during the term of the receiving PHA's voucher [24 CFR 982.355(c)(15)].

Timing of Voucher Issuance

HUD expects the receiving PHA to issue the voucher within two weeks after receiving the family's HUD-52665 and supporting documentation from the initial PHA if the information is in order, the family has contacted the receiving PHA, and the family complies with the receiving PHA's procedures [Notice PIH 2016-092-42].

HACA Policy

When a family ports into its jurisdiction, HACA will issue the family a voucher based on the paperwork provided by the initial PHA unless the family's paperwork from the initial PHA is incomplete, the family's voucher from the initial PHA has expired or the family does not comply with the HACA's procedures.

HACA will conduct a criminal background check on all adult household members. HACA will not delay issuing the family a voucher or otherwise delay approval of a unit until this process is completed. However, HACA may take subsequent action (e.g. terminating the family's participation in the program due to criminal background or failing to disclose necessary information) against the family based on the results.

Voucher Term

The term of the receiving PHA's voucher may not expire before 30 calendar days from the expiration of the initial PHA's voucher [24 CFR 982.355(c)(13)]. If the initial PHA extends the term of the voucher, the receiving PHA's voucher may not expire before 30 days from the new expiration date of the initial PHA's voucher [Notice PIH 2016-09].

HACA Policy

HACA's voucher will expire 30 calendar days from the expiration date of the initial PHA's voucher. If the initial PHA extends the term of the voucher, HACA's voucher will expire 30 calendar days from the new expiration date of the initial PHA's voucher.

Voucher Extensions [24 CFR 982.355(c)(14), Notice 2016-092-42]

Once the receiving PHA issues the portable family a voucher, the receiving PHA's policies on extensions of the voucher term apply. The receiving PHA must inform the initial PHA of any extension granted to the term of the voucher. It must also bear in mind the billing deadline provided by the initial PHA. Unless willing and able to absorb the family, the receiving PHA should ensure that any voucher expiration date would leave sufficient time to process a request for tenancy approval, execute a HAP contract, and deliver the initial billing to the initial PHA.

HACA Policy

Except as a reasonable accommodation to a person with disabilities (see Chapter 2), HACA generally will not extend the term of the voucher that it issues to an incoming

Initial Billing Deadline

If a portable family's search for a unit is successful and the receiving PHA intends to administer the family's voucher, the receiving PHA must submit its initial billing notice (Part II of form HUD-52665) ~~(a) no later than 10 business days following the date the receiving PHA executes a HAP contract on behalf of the family and (b)~~ in time that the notice will be **received** no later than 960 days following the expiration date of the family's voucher issued by the initial PHA [Notice PIH 2016-092-42]. ~~This deadline may be extended for 30 additional days if the delay is due to suspension of the voucher's term (see Initial Billing Section).~~ A copy of the family's form HUD-50058, Family Report, completed by the receiving PHA must be attached to the initial billing notice. The receiving PHA may send these documents by mail, fax, or e-mail.

HACA Policy

HACA will send its initial billing notice by fax or e-mail, if necessary, to meet the billing deadline but will also send the notice by regular mail.

If the receiving PHA fails to send the initial billing ~~by the deadline within 10 business days following the date the HAP contract is executed~~, it is required to absorb the family into its own program unless (a) the initial PHA is willing to accept the late submission or (b) HUD requires the initial PHA to honor the late submission (e.g., because the receiving PHA is over leased) [Notice PIH 2016-092-42].

Ongoing Notification Responsibilities [Notice PIH 2016-092-42, HUD-52665]

Annual Reexamination. The receiving PHA must send the initial PHA a copy of a portable family's updated form HUD-50058 after each annual reexamination for the duration of time the receiving PHA is billing the initial PHA on behalf of the family, regardless of whether there is a change in the billing amount.

HACA Policy

HACA will send a copy of the updated HUD-50058 by regular mail no later than 10 business days after the effective date of the reexamination. ~~at the same time the family and owner are notified of the reexamination results.~~

Change in Billing Amount. The receiving PHA is required to notify the initial PHA, using form HUD-52665, of any change in the billing amount for the family as a result of:

- A change in the HAP amount (because of a reexamination, a change in the applicable payment standard, a move to another unit, etc.)
- An abatement or subsequent resumption of the HAP payments
- Termination of the HAP contract
- Payment of a damage/vacancy loss claim for the family
- Termination of the family from the program

The timing of the notice of the change in the billing amount should correspond with the notification to the owner and the family in order to provide the initial PHA with advance notice of the change. Under no circumstances should the notification be later than 10 business days following the effective date of the change in the billing amount. If the receiving PHA fails to send Form HUD-52665 within 10 days of effective date of billing changes, the initial PHA is not

Absorbing a Portable Family

The receiving PHA may absorb an incoming portable family into its own program when the PHA executes a HAP contract on behalf of the family or at any time thereafter providing that the PHA has funding available under its annual contributions contract (ACC) [24 CFR 982.355(d)(1), Notice PIH 2016-092-42].

If the receiving PHA absorbs a family from the point of admission, the admission will be counted against the income targeting obligation of the receiving PHA [24 CFR 982.201(b)(2)(vii)].

If the receiving PHA absorbs a family after providing assistance for the family under a billing arrangement with the initial PHA, the receiving PHA must send an updated form HUD-52665 to the initial PHA no later than 10 business days following the effective date of the termination of the billing arrangement. ~~HUD encourages the receiving PHA to provide adequate advance notice to the initial PHA to avoid having to return an overpayment. The receiving PHA must specify the effective date of the absorption of the family.~~ [Notice PIH 2016-092-42]

HACA Policy

If HACA decides to absorb a portable family upon the execution of a HAP contract on behalf of the family, HACA will notify the initial PHA by the initial billing deadline specified on form HUD-52665. The effective date of the HAP contract will be the effective date of the absorption.

If HACA decides to absorb a family after that, it will provide the initial PHA with 30 days' advance notice, but no later than 10 business days following the effective date of the termination of the billing arrangement.

Following the absorption of an incoming portable family, the family is assisted with funds available under the consolidated ACC for the receiving PHA's voucher program [24 CFR 982.355(d)], and the receiving PHA becomes the initial PHA in any subsequent moves by the family under portability [24 CFR 982.355(e)(4)].

15-VII.B. FAMILY ELIGIBILITY [24 CFR 982.627]

The family must meet all of the requirements listed below before the commencement of homeownership assistance. HACA may also establish additional initial requirements as long as they are described in HACA administrative plan.

- The family must have been admitted to the Housing Choice Voucher program.
- The family must qualify as a first-time homeowner, or may be a cooperative member. Qualification includes:
 - No member of the household has had an ownership interest in any residence during the three years preceding commencement of home ownership assistance. However, a single parent or displaced homemaker who, while married, owned a home with a spouse/significant other (or resided in a home owned by a spouse/significant other) is considered a 'first-time homeowner' for purposes of the homeownership program.
 - The right to purchase title to a residence under a lease-purchase agreement is not considered an 'ownership interest'.
 - HACA may exempt families that include a person with disabilities from this requirement as a reasonable accommodation.
- The family must meet the Federal minimum income requirement. The family must have a gross annual income equal to the Federal minimum wage multiplied by 2000, based on the income of adult family members who will own the home. HACA may establish a higher income standard for families. However, a family that meets the federal minimum income requirement (but not HACA's requirement) will be considered to meet the minimum income requirement if it can demonstrate that it has been pre-qualified or pre-approved for financing that is sufficient to purchase an eligible unit.

HACA Policy

HACA will not establish a higher minimum income standard for disabled and/or non-disabled families.

- For disabled families, the minimum income requirement is equal to the current SSI monthly payment for an individual living alone, multiplied by 12.
- For elderly or disabled families, welfare assistance payments for adult family members who will own the home will be included in determining whether the family meets the minimum income requirement. It will not be included for other families.
- ~~For disabled and elderly families, there will be no additional minimum income requirement. For non-disabled families, the minimum income requirement will be the Federal minimum wage times 2000 per year. The requirements of 982.627(c)(3) will be applicable.~~

~~○ Minimum Wage~~

- ~~▪ \$6.55 beginning 7/24/2008~~
- ~~▪ \$7.25 beginning 7/24/2009~~

- The family must satisfy the employment requirements by demonstrating that one or more adult members of the family who will own the home at commencement of homeownership assistance is currently employed on a full-time basis (the term 'full-time employment' means not less than an average of 30 hours per week); and has been continuously so employed during the year before commencement of homeownership assistance for the family.

HACA Policy

Families will be considered “continuously employed” if the break in employment does not exceed four months.

HACA will count self-employment in a business when determining whether the family meets the employment requirement.

- The employment requirement does not apply to elderly and disabled families. In addition, if a family, other than an elderly or disabled family includes a person with disabilities, HACA must grant an exemption from the employment requirement if HACA determines that it is needed as a reasonable accommodation.
- The family has not defaulted on a mortgage securing debt to purchase a home under the homeownership option
- Except for cooperative members who have acquired cooperative membership shares prior to commencement of homeownership assistance, no household member has a present ownership interest in a residence at the commencement of homeownership assistance for the purchase of any home.
- Except for cooperative members who have acquired cooperative membership shares prior to the commencement of homeownership assistance, the family has entered a contract of sale in accordance with 24 CFR 982.631(c).

HACA Policy

HACA will impose additional eligibility requirements. To be eligible to participate in the homeownership option, families must meet the following criteria:

~~The family has had no family-caused violations of HUD’s Housing Quality standards within the past year.~~

The family is not within the initial period of a HAP Contract.

The family does not owe money to HACA or any other PHA.

The family has not committed any serious or repeated violations of a PHA-assisted lease within the past year.

Notification to Program Applicants and Participants [24 CFR 5.2005(a)(1)]

PHAs are required to inform applicants and program participants of their rights under VAWA, including their right to confidentiality and the limits thereof, when they are denied assistance, when they are admitted to the program, and when they are notified of an eviction or termination of housing benefits.

HACA Policy

HACA will provide all applicants with information about VAWA at the time they are provided assistance (see section 5-I.B) ~~they request an application for housing assistance.~~

HACA will also include information about VAWA in all notices of denial of assistance (see section 3-III.G).

~~HACA will provide all participants with information about VAWA at the time of admission (see section 5-I.B) and at annual reexamination.~~ HACA will also include information about VAWA in notices of termination of assistance, as provided in section 12-II.F.

The VAWA information provided to applicants and participants will consist of the notice in Exhibit 16-1 and 16-2.

Notification to Owners and Managers

While PHAs are no longer required by regulation to notify owners and managers participating in the HCV program of their rights and obligations under VAWA, the PHA may still choose to inform them.

HACA Policy

HACA will notify owners and managers about their rights and obligations under VAWA when they begin their participation in the HCV program.

HACA will provide owners and managers with the link to its website and indicate that Exhibit 16-5 and a copy of form HUD-5382, Certification of Domestic Violence, Dating Violence, and Stalking and Alternate Documentation, are available on the website.

PART I: GENERAL REQUIREMENTS

17-I.A. OVERVIEW [24 CFR 983.5]

The project-based voucher (PBV) program allows public housing authorities (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 authorized units ~~voucher program budget authority~~ and attach the funding to specific units rather than using it for tenant-based assistance [24 CFR 983.6]. ~~The PHHACA~~ may only operate a PBV program if doing so is consistent with the ~~PHHACA~~'s Annual Plan, and the goal of deconcentrating poverty and expanding housing and economic opportunities [42 U.S.C. 1437f(o)(13)].

HACA Policy

HACA will operate a project-based voucher program using up to a maximum of 20 percent of its authorized units ~~budget authority~~ for project-based assistance. This assistance will be allocated over a multi-year period.

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 a HAP contract (Agreement) or a Housing Assistance Payments contract (HAP), ~~the PHHACA~~ is not required to reduce the number of these units if the amount of budget authority is subsequently reduced. However, ~~the PHHACA~~ is responsible for determining the amount of budget authority that is available for project-based vouchers and for ensuring that the amount of assistance that is attached to units is within the amounts available under the ACC, ~~[24 CFR 983.6], regardless of whether the PHA has vouchers available for project-basing [24 CFR 983.6 and FR Notice 1/18/17].~~

Additional Project-Based Units [FR Notice 1/18/17]

The PHA may project-base an additional 10 percent of its units above the 20 percent program limit, 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).
- 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.

HACA Policy

HACA will set aside units above the 20 percent program limit.

Units Not Subject to the PBV Program Limitation [FR Notice 1/18/17]

PBV units under the RAD program and HUD-VASH PBV set-aside vouchers do not count toward the 20 percent limitation when PBV assistance is attached to them.

In addition, units that were previously subject to certain federal rent restrictions or were receiving another type of long-term housing subsidy provided by HUD are not subject to the cap. In order to be excepted, the unit must meet the following conditions:

- The unit must be covered under a PBV HAP contract that first became effective on or after 4/18/17; and
- In the five years prior to the date the PHA either issued the RFP or selected the project, the unit either:
 - Received Public Housing Capital or Operating Funds, Project-Based Rental Assistance, Housing for Elderly (Section 202), Housing for Persons with Disabilities (section 811), Rent Supplement (Rent Supp), or Rental Assistance Program (RAP); or
 - The unit was subject to a rent restriction through a loan or insurance program as a result of Section 236, Section 221(d)(3) or (d)(4) BMIR, Housing for Elderly Persons (Section 202), or Housing for Persons with Disabilities (Section 811)

Units that have previously received either PBV or HCV assistance are not covered under the exception.

HACA Policy

HACA may project-base one or more of the above unit types at its discretion.

17-I.B. TENANT-BASED VS. PROJECT-BASED VOUCHER ASSISTANCE [24 CFR 983.2]

Much of the tenant-based voucher program regulations also apply to the PBV program. Consequently, many of ~~the PHHACA~~'s policies related to tenant-based assistance also apply to PBV assistance. The provisions of the tenant-based voucher regulations that do not apply to the PBV program are listed at 24 CFR 983.2.

HACA Policy

Except as otherwise noted in this chapter, or unless specifically prohibited by PBV program regulations, HACA's policies for the tenant-based voucher program contained in this administrative plan also apply to the PBV program and its participants.

17-I.C. RELOCATION REQUIREMENTS [24 CFR 983.7]

Any persons displaced as a result of implementation of the PBV program must be provided relocation assistance in accordance with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA)[42 U.S.C. 4201-4655] and implementing regulations at 49 CFR part 24.

The cost of required relocation assistance may be paid with funds provided by the owner, local public funds, or funds available from other sources. ~~PHHACAs~~ may not use voucher program funds to cover relocation costs, except that ~~PHAsHACA~~ may use its administrative fee reserve to

PART II: PBV OWNER PROPOSALS

17-II.A. OVERVIEW

With certain exceptions, the PHHACA must describe the procedures for owner submission of PBV proposals and for PHHACA selection of PBV proposals [24 CFR 983.51]. Before selecting a PBV proposal, the PHHACA must determine that the PBV proposal complies with HUD program regulations and requirements, including a determination that the property is eligible housing [24 CFR 983.53 and 983.54], complies with the cap on the number of PBV units per project [24 CFR 983.56], and meets the site selection standards [24 CFR 983.57]. The PHHACA may not commit PBVs until or unless it has followed the proposal selection requirements defined in 24 CFR 983.51 [Notice PIH 2011-54].

17-II.B. OWNER PROPOSAL SELECTION PROCEDURES [24 CFR 983.51(b)]

The PHHACA must select PBV proposals in accordance with the selection procedures in the PHHACA's administrative plan. The PHHACA must select PBV proposals by either of the following two methods.

- PHHACA request for PBV proposals. The PHHACA may solicit proposals by using a request for proposals (RFP) to select proposals on a competitive basis in response to the PHHACA's request. The PHHACA 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 PHHACA 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. In such cases, the PHHACA need not conduct another competition.

Units Selected Non-Competitively [FR Notice 1/18/17]

For certain public housing projects where the PHA has an ownership interest or control and will spend a minimum amount per unit on rehabilitation or construction, the PHA may select a project without following one of the two processes above.

HACA Policy

HACA will not attach PBVs to projects owned by HACA as described above.

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

PHHACA procedures for selecting PBV proposals must be designed and actually operated to provide broad public notice of the opportunity to offer PBV proposals for consideration by the PHHACA. The public notice procedures may include publication of the public notice in a local

until HUD, or a HUD-approved housing credit agency (HCA), has conducted any required subsidy layering review and determined that the PBV assistance is in accordance with HUD subsidy layering requirements. However, in order to satisfy applicable requirements, HCAs must conduct subsidy layering reviews in compliance with the guidelines set forth in the *Federal Register* notice published July 9, 2010.

The HAP contract must contain the owner's certification that the project has not received and will not receive (before or during the term of the HAP contract) any public assistance for acquisition, development, or operation of the housing other than assistance disclosed in the subsidy layering review in accordance with HUD requirements.

17-II.F. CAP ON NUMBER OF PBV UNITS IN EACH PROJECT

25 Percent/25 Unit per Project Cap [24 CFR 983.56]

In general, ~~the PHHACA~~ may not select a proposal to provide PBV assistance for units or enter into an Agreement or a HAP contract to provide PBV assistance for units, if the total number of dwelling units that will receive PBV assistance during the term of the PBV HAP contract is more than the greater of 25 units or 25 percent of the number of dwelling units (assisted or unassisted) in the project.

Exceptions to 25 Percent/25 Unit per Project Cap [~~FR Notice 1/18/17~~ 24 CFR 983.56(b)]

Exceptions are allowed and PBV units are not counted against the 25 percent or 25-unit per project cap if:

- The units are in a single-family building (one to four units);
- ~~The units are *excepted units* in a multifamily project because they are specifically made available for 1) elderly and/or 2) disabled families or 3) families receiving supportive services (also known as *qualifying families*).~~
- The units are exclusively for elderly families
- The units are for households eligible for supportive services available to all families receiving PBV assistance in the project ("Supportive Services Household")
- The project is 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

The Housing Opportunity Through Modernization Act of 2016 (HOTMA) eliminated the project cap exemption for projects that serve disabled families and modified the exception for supportive services. Projects where these caps were implemented prior to HOTMA may continue to use the former exemptions and may renew their HAP contracts under the old requirements, unless the PHA and owner agree to change the conditions of the HAP contract. However, this change may not be made if it would jeopardize an assisted family's eligibility for continued assistance in the project.

~~PHAs~~HACA must include in the ~~PHHACA~~ administrative plan the type of services offered to families for a project to qualify for the exception and the extent to which such services will be provided. The project must make supportive services available to all families receiving PBV assistance in the project, but the family does not actually have to accept and receive supportive services for the exception to apply to the unit. It is not necessary that the services be provided at

or by the project, but must be reasonably available to families receiving PBV assistance at the project and designed to help families in the project achieve self-sufficiency or live in the community as independently as possible. ~~if they are approved services. A PHA may not require participation in the supportive service as a condition of living in the excepted unit, although such services may be offered.~~

~~To qualify, a family must have at least one member receiving at least one qualifying supportive service. HACA may not require participation in medical or disability related services other than drug and alcohol treatment in the case of current abusers as a condition of living in an excepted unit, although such services may be offered.~~

If a family at the time of initial tenancy is receiving, and while the resident of an excepted unit has received, Family Self-Sufficiency (FSS) supportive services or any other supportive services as defined in the PHA~~HACA~~ administrative plan, and successfully completes the FSS contract of participation or the supportive services requirement, the unit continues to count as an excepted unit for as long as the family resides in the unit.

~~HACA must monitor the excepted family's continued receipt of supportive services and take appropriate action regarding those families that fail without good cause to complete their supportive services requirement. HACA's administrative plan must state the form and frequency of such monitoring.~~

HACA Policy

HACA will provide PBV assistance for excepted units. HACA will develop housing for occupancy by elderly families and Supportive Services Households. This may include disabled families, families in need of particular supportive services, or families participating in the Family Self-Sufficiency (FSS) program. ~~Families will not be required to accept and receive supportive services for the exception to apply to the unit, and/or disabled families and/or families receiving supportive services. Families in need of services may include elderly families, disabled families, families in need of particular supportive services, or families participating in the FSS Program. Elderly and disabled families may live in excepted units without the requirement of receiving supportive services. Families qualified as receiving supportive services and families in the FSS Program must receive the services, and/or successfully complete the service program, to be eligible for continued occupancy.~~

~~Families qualified as receiving supportive services and families in the FSS Program that do not continue to receive the services or complete the required service program will be terminated in accordance with HACA policies in Section 12-II.F.~~

The following types of services will be provided, depending on the needs of the family, to the extent the family needs the services:

- Transportation for activities such as, (but not limited to) grocery shopping, job training, education, attending medical and dental appointments, etc.
- Supervised taking of medications
- Treatment for drug addiction (for recovering an current users)
- Treatment for alcohol addiction (for recovering and current users)

- Training and development of housekeeping and homemaking skills
- Housekeeping aid
- Family budgeting
- Child care
- Parenting skills
- Computer access and training
- Library access
- Work skills development, job training and employment counseling
- Educational/vocational opportunities
- Case management services and/or counseling
- Access to Health and Psychiatric Services, i.e. nurse/medical staff, mental health professional, etc.
- Life skills training
- Access to on-site/off-site social activities
- Meal service adequate to meet nutritional need
- Personal assistance
- Health-related services
- Other services designed to help the recipient live in the community as independently as possible
- Employment assistance and job training
- Mental health services
- Assistance with activities of daily living
- Outpatient health services
- Services provided by State Medicaid programs to promote community based settings for individuals with disabilities

~~Annually, during the recertification process, HACA will examine the families' receipt of supportive services to determine and confirm that the families still qualify to continue receiving PBV assistance. HACA will require families receiving services to provide written evidence from each service provider that the family has received all of the required services stated in the statement of family obligations or FSS contract of family participation. Alternately, each service provider will monitor and submit a report to HACA identifying the services received by each family, and HACA will document if all services required in the statement of family obligations or FSS contract of participation were received. If the family fails without good cause to receive all of the required services stated in the statement of family obligations or FSS contract of participation between the time of the annual reports, the family and service provider must notify HACA of the failure in writing within 10 business days of the failure.~~

Projects not Subject to a Project Cap [FR Notice 1/18/17]

PBV units that were previously subject to certain federal rent restrictions or receiving another type of long-term housing subsidy provided by HUD are exempt from the project cap. In other words, 100 percent of the units in these projects may receive PBV assistance. To qualify for the exception, the unit must:

- Be covered by a PBV HAP contract that first became effective on or after 4/18/17; and
- In the five years prior to the date the PHA either issued the RFP under which the project was selected or the PHA selected the project without competition, the unit met at least one of the two following conditions:
 - The unit received Public Housing Capital or Operating Funds, Project-Based Rental Assistance, Housing for the Elderly (Section 303), Housing for Persons with disabilities (Section 811), the Rental Supplement program,
 - The unit was subject to a rent restriction as a result of one of the following HUD loans or insurance programs: Section 236, Section 221(d)(3) or (d)(4) BMIR, Housing for the Elderly (Section 202), or Housing for Persons with Disabilities (Section 811)

Units that were previously receiving PBV assistance are not covered by the exception. Both existing and rehabilitation units are eligible for this exception. Newly constructed units qualify if they meet the definition of *replacement unit* described in FR Notice 1/18/17.

HACA Policy

HACA does not have any PBV units that are subject to the per project cap exception.

Promoting Partially-Assisted Projects [24 CFR 983.56(c)]

~~A PHA~~HACA may establish local requirements designed to promote PBV assistance in partially assisted projects. A *partially assisted project* is a project in which there are fewer units covered by a HAP contract than all residential units [24 CFR 983.3].

~~A PHA~~HACA may establish a per-project cap on the number of units that will receive PBV assistance or other project-based assistance in a multifamily project containing excepted units or in a single-family building. ~~A PHA~~HACA may also determine not to provide PBV assistance for excepted units, or ~~the PHA~~HACA may establish a per-project cap of less than 25 percent.

HACA Policy:

HACA will not impose any cap beyond HUD regulations on the number of PBV units assisted per project.

17-II.G. SITE SELECTION STANDARDS**Compliance with PBV Goals, Civil Rights Requirements, and HQS Site Standards [24 CFR 983.57(b)]**

~~The PHA~~HACA may not select a proposal for existing, newly constructed, or rehabilitated PBV housing on a site or enter into an Agreement or HAP contract for units on the site, unless ~~the PHA~~HACA has determined that PBV assistance for housing at the selected site is consistent with the goal of deconcentrating poverty and expanding housing and economic opportunities. The standard for deconcentrating poverty and expanding housing and economic opportunities must

PART III: DWELLING UNITS

17-III.A. OVERVIEW

This part identifies the special housing quality standards that apply to the PBV program, housing accessibility for persons with disabilities, and special procedures for conducting housing quality standards inspections.

17-III.B. HOUSING QUALITY STANDARDS [24 CFR 983.101]

The housing quality standards (HQS) for the tenant-based program, including those for special housing types, generally apply to the PBV program. HQS requirements for shared housing, manufactured home space rental, and the homeownership option do not apply because these housing types are not assisted under the PBV program.

The physical condition standards at 24 CFR 5.703 do not apply to the PBV program.

Lead-based Paint [24 CFR 983.101(c)]

The lead-based paint requirements for the tenant-based voucher program do not apply to the PBV program. Instead, The Lead-based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations at 24 CFR part 35, subparts A, B, H, and R, apply to the PBV program.

17-III.C. HOUSING ACCESSIBILITY FOR PERSONS WITH DISABILITIES

The housing must comply with program accessibility requirements of section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and implementing regulations at 24 CFR part 8. The PHHACA must ensure that the percentage of accessible dwelling units complies with the requirements of section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as implemented by HUD's regulations at 24 CFR 8, subpart C.

Housing first occupied after March 13, 1991, must comply with design and construction requirements of the Fair Housing Amendments Act of 1988 and implementing regulations at 24 CFR 100.205, as applicable. (24 CFR 983.102)

17-III.D. INSPECTING UNITS

Pre-selection Inspection [24 CFR 983.103(a)]

The PHHACA must examine the proposed site before the proposal selection date. If the units to be assisted already exist, the PHHACA must inspect all the units before the proposal selection date, and must determine whether the units substantially comply with HQS. To qualify as existing housing, units must substantially comply with HQS on the proposal selection date. However, the PHHACA may not execute the HAP contract until the units fully comply with HQS, unless the PHA has adopted a policy to enter into a HAP contract for units that fail the initial HQS inspection as a result of only non-life-threatening conditions.

Pre-HAP Contract Inspections [24 CFR 983.103(b); FR Notice 1/18/17]

The PHHACA must inspect each contract unit before execution of the HAP contract. The PHHACA may not enter into a HAP contract covering a unit until the unit fully complies with HQS, unless the PHA has adopted a policy to enter into a HAP contract for units that fail the initial HQS inspection as a result of only non-life-threatening conditions.

HACA Policy

HACA will not enter into a PBV HAP contract until all units that will be under contract fully comply with HQS.

Turnover Inspections [24 CFR 983.103(c)]

Before providing assistance to a new family in a contract unit, The PHHACA must inspect the unit. The PHHACA may not provide assistance on behalf of the family until the unit fully complies with HQS.

Annual/Biennial Inspections [24 CFR 983.103(d); FR Notice 6/25/14; PIH-2015-05]

At least once every 24 months during the term of the HAP contract, the PHHACA must inspect a random sample, consisting of at least 20 percent of the contract units in each building, to determine if the contract units and the premises are maintained in accordance with HQS. Turnover inspections are not counted toward meeting this inspection requirement.

HACA Policy

Once every 24 months, HACA will inspect, at a minimum, a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS.

If more than 20 percent of the sample of inspected contract units in a building fails the initial inspection, the PHHACA must re-inspect 100 percent of the contract units in the building.

Other Inspections [24 CFR 983.103(e)]

The PHHACA must inspect contract units whenever needed to determine that the contract units comply with HQS and that the owner is providing maintenance, utilities, and other services in accordance with the HAP contract. The PHHACA must take into account complaints and any other information coming to its attention in scheduling inspections.

The PHHACA must conduct follow-up inspections needed to determine if the owner (or, if applicable, the family) has corrected an HQS violation, and must conduct inspections to determine the basis for exercise of contractual and other remedies for owner or family violation of HQS.

In conducting PHHACA supervisory quality control HQS inspections, the PHHACA should include a representative sample of both tenant-based and project-based units.

Inspecting PHHACA-Owned Units [24 CFR 983.103(f)]

In the case of PHHACA-owned units, the inspections must be performed by an independent agency designated by the PHHACA and approved by HUD. The independent entity must furnish a copy of each inspection report to the PHHACA and to the HUD field office where the project

HACA Policy

For existing housing, the HAP contract will be executed promptly, pursuant to HACA determining that all units pass HQS.

For rehabilitated or newly constructed housing, the HAP contract will be executed promptly, pursuant to HACA determining that the units have been completed in accordance with the Agreement (in addition to completing other requirements stated in the RFP) and that all units meet HQS; in addition to the owner having submitted all required evidence of completion.

Term of HAP Contract [24 CFR 983.205; FR Notice 1/18/17]

~~The PHHACA~~ may enter into a HAP contract with an owner for an initial term of no less than one year and no more than ~~20~~fifteen years for each contract unit. The length of the term of the HAP contract for any contract unit may not be less than one year, nor more than ~~20~~15 years. In the case of PHA-owned units, the term of the HAP contract must be agreed upon by the PHA and the independent entity approved by HUD [24 CFR 983.59(b)(2)].

HACA Policy

All PBV HAP contracts will be negotiated with the owner for a ~~15~~20-year term.

At the time of execution of the initial HAP contract or any time before expiration of the HAP contract, ~~the PHHACA~~ may extend the term of the contract for any additional term of up to ~~20~~15 years if ~~the PHHACA~~ determines an extension is appropriate to continue providing affordable housing for low-income families. A HAP contract extension may not exceed ~~20~~15 years. ~~The PHHACA~~ may provide for multiple extensions; however, in no circumstances may such extensions exceed ~~20~~15 years, cumulatively. Extensions after the initial extension are allowed at the end of any extension term, provided that not more than 24 months prior to the expiration of the previous extension contract ~~the PHHACA~~ agrees to extend the term, and that such extension is appropriate to continue providing affordable housing for low-income families or to expand housing opportunities. Extensions after the initial extension term shall not begin prior to the expiration date of the previous extension term. Subsequent extensions are subject to the same limitations. All extensions must be on the form and subject to the conditions prescribed by HUD at the time of the extension. In the case of ~~PHHACA~~-owned units, any extension of the term of the HAP contract must be agreed upon by ~~the PHHACA~~ and the independent entity approved by HUD [24 CFR 983.59(b)(2)].

HACA Policy

When determining whether or not to extend an expiring PBV contract, HACA will consider several factors including, but not limited to, as applicable,;

- The cost of extending the contract and the amount of available budget authority;
- The condition of the contract units;
- The owner's record of compliance with obligations under the HAP contract and lease(s);
- Whether the location of the units continues to support the goals of deconcentrating poverty and expanding housing opportunities;

17-VLC. ORGANIZATION OF THE WAITING LIST [24 CFR 983.251(c)]

The PHHACA may establish a separate waiting list for PBV units or it may use the same waiting list for both tenant-based and PBV assistance. The PHHACA may also merge the PBV waiting list with a waiting list for other assisted housing programs offered by the PHHACA. If the PHHACA chooses to offer a separate waiting list for PBV assistance, the PHHACA must offer to place applicants who are listed on the tenant-based waiting list on the waiting list for PBV assistance.

If the PHHACA decides to establish a separate PBV waiting list, the PHHACA may use a single waiting list for the PHHACA's whole PBV program, or it may establish separate waiting lists for PBV units in particular projects or for sets of such units. ~~The type of waiting list selected for the PBV program will be stated in HACA's Request for Proposal.~~

HACA Policy

HACA will use one waiting list for the tenant-based voucher program, project-based voucher program, and Moderate Rehabilitation program. Selection for each program is subject to the federal regulations and requirements for the particular program.

17-VLD. SELECTION FROM THE WAITING LIST [24 CFR 983.251(c)]

Applicants who will occupy units with PBV assistance must be selected from the PHHACA's HCV waiting list. The PHHACA may establish selection criteria or preferences for occupancy of particular PBV units. The PHHACA may place families referred by the PBV owner on its HCV waiting list, if it is open to such families.

Income Targeting [24 CFR 983.251(c)(6)]

At least 75 percent of the families admitted to the PHHACA's tenant-based and project-based voucher programs from the waiting list during the PHHACA fiscal year must be extremely-low income families. The income targeting requirement applies to the total of admissions to both programs.

Units with Accessibility Features [24 CFR 983.251(c)(7)]

When selecting families to occupy PBV units that have special accessibility features for persons with disabilities, the PHHACA must first refer families who require such features to the owner.

Preferences [24 CFR 983.251(d), FR Notice 11/24/08]

The PHHACA may use the same selection preferences that are used for the tenant-based voucher program, establish selection criteria or preferences for the PBV program as a whole, or for occupancy of particular PBV developments or units. The PHHACA must provide an absolute selection preference for eligible in-place families as described in Section 17-VI.B. above.

The PHA may establish a selection preference for families who qualify for voluntary services, including disability-specific services, offered in conjunction with assisted units, provided that preference is consistent with the PHA plan. The PHA may not, however, grant a preference to a person with a specific disability [FR Notice 1/18/17].

~~Although HACA is prohibited from granting preferences to persons with a specific disability, HACA may give preference to disabled families who need services offered at a particular project or site if the preference is limited to families (including individuals):~~

- ~~• With disabilities that significantly interfere with their ability to obtain and maintain themselves in housing;~~
- ~~• Who, without appropriate supportive services, will not be able to obtain or maintain themselves in housing; and~~
- ~~• For whom such services cannot be provided in a non-segregated setting.~~

In advertising such a project, the owner may advertise the project as offering services for a particular type of disability; however, the project must be open to all otherwise eligible disabled persons who may benefit from services provided in the project. In these projects, disabled residents may not be required to accept the particular services offered as a condition of occupancy.

If ~~the PHHACA~~ has projects with ~~more than 25 percent of the units receiving project-based assistance because those projects include~~ “excepted units” for elderly families or Supportive Services Households (units specifically made available for elderly or disabled families, or families receiving supportive services), ~~the PHHACA~~ must give preference to such families when referring families to these units [24 CFR 983.251(d); FR Notice 1/18/17].

HACA Policy

HACA will provide a selection preference when required by the regulations (e.g., eligible in-place families, qualifying families for elderly families or Supportive Services Households, or “excepted units,” mobility impaired persons for accessible units). Additional preferences have been established for the projects, buildings, or sets of units listed in section 4-III.C-Local Preferences-Section 8 Project-Based Voucher Program (PBV).

17-VLE. OFFER OF PBV ASSISTANCE

Refusal of Offer [24 CFR 983.251(e)(3)]

~~The PHHACA~~ is prohibited from taking any of the following actions against a family who has applied for, received, or refused an offer of PBV assistance:

- Refuse to list the applicant on the waiting list for tenant-based voucher assistance;
- Deny any admission preference for which the applicant qualifies;
- Change the applicant’s place on the waiting list based on preference, date, and time of application, or other factors affecting selection under the PHHACA’s selection policy;
- Remove the applicant from the tenant-based voucher waiting list.

Disapproval by Landlord [24 CFR 983.251(e)(2)]

If a PBV owner rejects a family for admission to the owner’s units, such rejection may not affect the family’s position on the tenant-based voucher waiting list.

Acceptance of Offer [24 CFR 983.252]

notice to ~~the PHHACA~~. If the family wishes to move with continued tenant-based assistance, the family must contact ~~the PHHACA~~ to request the rental assistance prior to providing notice to terminate the lease.

If the family terminates the lease in accordance with these requirements, ~~the PHHACA~~ is required to offer the family the opportunity for continued tenant-based assistance, in the form of a voucher or other comparable tenant-based rental assistance. If voucher or other comparable tenant-based assistance is not immediately available upon termination of the family's lease in the PBV unit, ~~the PHHACA~~ must give the family priority to receive the next available opportunity for continued tenant-based assistance.

HACA Policy

Prior to assisting currently housed PBV holders who have priority to receive the next available opportunity for continued tenant-based assistance, HACA will set aside PBVs committed for new projects coming on-line (if applicable) and assist applicants for 1.) Targeted Funding and 2.) FUP Graduates and CHOICES or FACT Programs Graduates as described in section 4-III.C.-Local Preferences-Section 8 Housing Choice Voucher Program (HCV) as these forms of tenant-based assistance have previously been committed and are not available.

If the family terminates the assisted lease before the end of the first year, the family relinquishes the opportunity for continued tenant-based assistance.

17-VI.D. EXCEPTIONS TO THE OCCUPANCY CAP [24 CFR 983.262

]

~~The PHHACA may not pay housing assistance under a PBV HAP contract for more than the greater of 25 units or 25 percent of the number of dwelling units in a project unless: ~~the units are [24 CFR 983.56]:~~~~

- ~~• The units are exclusively for elderly families~~
- ~~• The units are for households eligible for supportive services available to all families receiving PBV assistance in the project~~
- ~~• The project is 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~~
- ~~• In a single family building;~~
- ~~• Specifically made available for elderly and/or disabled families; or~~
- ~~• Specifically made available for families receiving supportive services as defined by HACA. At least one member must be receiving at least one qualifying supportive service.~~

If a family at the time of initial tenancy is receiving and while the resident of an excepted unit has received FSS supportive services or any other service as defined by ~~the PHHACA~~ and successfully completes the FSS contract of participation or the supportive services requirement, the unit continues to count as an excepted unit for as long as the family resides in the unit.

~~However, if the FSS family fails to successfully complete the FSS contract of participation or supportive services objective and consequently is no longer eligible for any of the supportive~~

services offered at or by the project, the family must vacate the unit within a reasonable period of time established by the PHA, and the PHA shall cease paying HAP on behalf of the family.

Further, when a~~A~~ family (or remaining members of a family) residing in an excepted unit ~~that~~ no longer meets the criteria for a “qualifying family” ~~in connection with the 25 percent per project cap exception (e.g., a family that does not successfully complete its FSS contract of participation or supportive services requirements, or a~~ because the family ~~that~~ is no longer ~~an~~ elderly ~~family or Supportive Services Household or disabled~~ due to a change in family composition, ~~where the PHHACA has the discretion does not exercise discretion~~ to allow the family to remain in the excepted unit. ~~); If the PHA does not exercise this discretion, the family~~ must vacate the unit within a reasonable period of time established by the PHHACA, and the PHHACA must cease paying housing assistance payments on behalf of the non-qualifying family.

Individuals in units with supportive services who choose to no longer participate in a service or who no longer qualify for services they qualified for at the time of initial occupancy cannot subsequently be denied continued housing opportunity because of this changed circumstance. A PHA or owner cannot determine that a participant’s needs exceed the level of care offered by qualifying services or require that individuals be transitioned to different projects based on service needs.

If the family fails to vacate the unit within the established time, the unit must be removed from the HAP contract unless the project is partially assisted, and it is possible for the HAP contract to be amended to substitute a different unit in the building in accordance with program requirements or temporarily remove the unit from the PBV HAP contract; or the owner terminates the lease and evicts the family. The housing assistance payments for a family residing in an excepted unit that is not in compliance with its family obligations to comply with supportive services requirements must be terminated by the PHHACA.

The PHHACA may allow a family that initially qualified for occupancy of an excepted unit based on elderly ~~or disabled~~ family or Supportive Services Household status to continue to reside in a unit, where through circumstances beyond the control of the family (e.g., death of the elderly ~~or disabled~~ family or Supportive Services Household member or long-term or permanent hospitalization or nursing care), the elderly ~~or disabled~~ family or Supportive Services Household member no longer resides in the unit. In this case, the unit may continue to be counted as an excepted unit for as long as the family resides in that unit. Once the family vacates the unit, in order to continue as an excepted unit under the HAP contract, the unit must be made available to and occupied by a qualified family.

HACA Policy

HACA will allow families who initially qualified to live in an excepted unit to remain when circumstances change due to circumstances beyond the remaining family member’s control, when circumstances change due to a change in family composition, when an individual chooses to no longer participate in a service, or when an individual is no longer eligible for services they qualified for at the time of initial occupancy.

In all other cases, when HACA determines that a family no longer meets the criteria for a “qualifying family” in connection with the 25 percent per project cap exception, In cases where the FSS family fails to successfully complete the FSS contract of participation or supportive services objective and consequently is no longer eligible for any of the

supportive services offered at or by the project, HACA will provide written notice to the family and owner within 10 business days of making the determination. The family will be given 60 days from the date of the notice to move out of the PBV unit. If the family does not move out within this 60-day time frame, HACA will terminate the housing assistance payments at the expiration of this 60-day period. HACA may make exceptions to this 60-day period if needed for reasons beyond the family's control such as death, serious illness, or other medical emergency of a family member.

~~HACA may refer other eligible families to the excepted units. However, if there are no eligible families on the waiting list and the owner does not refer eligible families to HACA, HACA may amend the HAP contract to reduce the total number of units under the contract.~~

In the event an excepted unit no longer qualifies as excepted, at HACA's sole discretion, HACA may (i) substitute the excepted unit for a non-excepted unit if it is possible to do so in accordance with 24 CFR 983.207(a), so that the unit does not lose its excepted status, (ii) temporarily remove the unit from the PBV HACA contract and provide the family with tenant-based assistance, or (iii) remove the unit from the HAP contract.

HACA Policy

Upon written request by the owner, HACA will consider using the FMR or utility allowances in effect during the 30-day period before the start date of the HAP or redetermination of rent. The owner must explain the need to use the previous FMRs or utility allowances and include documentation in support of the request. HACA will review and make a decision based on the circumstances and merit of each request.

In addition to considering a written request from an owner, HACA may decide to use the FMR or utility allowances in effect during the 30-day period before the start date of the HAP, or redetermination of rent, if HACA determines it is necessary due to HACA budgetary constraints.

Use of Small Area FMRs (SAFMRs) [24 CFR 888.113(h)]

While small area FMRs (SAFMRs) do not apply to PBV projects, PHAs that operate a tenant-based program under SAFMRs (either by HUD-designation or because the PHA requested HUD approval to use SAFMRs) may apply SAFMRs to all future PBV HAP contracts. If the PHA adopts this policy, it must apply to all future PBV projects and the PHA's entire jurisdiction. The PHA and owner may not subsequently choose to revert back to use of the FMRs once the SAFMRs have been adopted, even if the PHA subsequently changes its policy.

Further, the PHA may apply SAFMRs to current PBV projects where the notice of owner selection was made on or before the effective dates of both the SAFMR designation and the PHA administrative plan policy, provided the owner is willing to mutually agree to doing so and the application is prospective. The PHA and owner may not subsequently choose to revert back to use of the FMRs once the SAFMRs have been adopted, even if the PHA subsequently changes its policy. If rents increase as a result of the use of SAFMRs, the rent increase may not be effective until the first anniversary of the HAP contract.

HACA Policy

HACA will not apply SAFMRs to HACA's PBV program.

Redetermination of Rent [24 CFR 983.302]

The PHHACA must redetermine the rent to owner upon the owner's request or when there is a 10~~five~~ percent or greater decrease in the published FMR.

Rent Increase

If an owner wishes to request an increase in the rent to owner from the PHHACA, it must be requested at the annual anniversary of the HAP contract (see Section 17-V.D.). The request must be in writing and in the form and manner required by the PHHACA. The PHHACA may only make rent increases in accordance with the rent limits described previously. There are no provisions in the PBV program for special adjustments (e.g., adjustments that reflect increases in the actual and necessary expenses of owning and maintaining the units that have resulted from substantial general increases in real property taxes, utility rates, or similar costs).

HACA Policy

An owner's request for a rent increase must be submitted to HACA 90 days prior to the anniversary date of the HAP contract, and must include the new rent amount the owner is proposing.

ATTACHMENT B

INTER GOVERNMENTAL AGREEMENT
COMPLETION OF THE ASSESSMENT OF FAIR HOUSING

THIS INTER-GOVERNMENTAL AGREEMENT COMPLETION OF THE ASSESSMENT OF FAIR HOUSING ("Agreement") is dated for convenience as of _____, 2017 by and among the County of Alameda, the City of Alameda, the City of Berkeley, the City of Fremont, the City of Hayward, the City of Livermore, the City of Oakland, the City of Pleasanton, the City of San Leandro, the City of Union City, the Housing Authority of the County of Alameda, the Housing Authority of the City of Alameda, the Berkeley Housing Authority, the Housing Authority of the City of Livermore, and the Housing Authority of the City of Oakland, hereinafter collectively referred to as the Participating County, Cities and Agencies ("PCCA" or "PCCA member(s)").

W I T N E S S E T H

WHEREAS, the PCCA recognizes that the Department of Housing and Urban Development (HUD) Affirmatively Furthering Fair Housing Final Rule ("AFFH") requires jurisdictions to submit an administratively burdensome plan and that regional submissions are encouraged; and

WHEREAS, the AFFH replaces the previous assessment tool, the Analysis of Impediments, with the Assessment of Fair Housing ("AFH") tool, which HUD funded program participants will use to identify and evaluate fair housing issues, and factors contributing to fair housing issues in their defined geographic area; and

WHEREAS, the AFH encourages and provides methodology for regional approaches to address fair housing issues, including collaboration across jurisdictions and public housing agencies; and

WHEREAS, all PCCA members have one or more HUD funded programs and activities that require compliance with AFFH and recognize that the AFH is a comprehensive review of their respective laws, regulations, administrative policies, procedures and practices; and

WHEREAS, the County of Alameda (the "County") will facilitate the competitive procurement and management of the contractor who will assist the PCCA with development of the AFH plan and will assume the role of lead for the PCCA regional effort; and

WHEREAS, all PCCA members recognize the efficiency of coordinating efforts to complete the AFH by the HUD prescribed deadline of the County; and

WHEREAS, the County's deadline for submission of the AFH is October 5, 2019; and

WHEREAS, the PCCA members have agreed to reimburse the County in an agreed-to proportionate amount to fund completion of the required meetings, plan, and submission documents; and

WHEREAS: the PCCA members agree that the participating county and cities will assume a 65% share of the cost and the Housing Authorities a 35% share of the total cost of the AFH consultant fee;

NOW, THEREFORE, the parties hereto do mutually agree as follows:

1. Funding: The parties agree to jointly fund the hiring of a consultant to develop a regional AFH for Alameda County. Each member of the PCCA will contribute funds as described in Attachment A - "Project Consultant Fee Contribution and Scope of Work."
2. Lead Agency: The County will act as lead agency in the development and completion of the regional AFH, including the procurement and contracting for the AFH consultant. As such, the County will, in compliance with appropriate Federal, State, and Local regulations, prepare all documents and undertake responsibilities set forth in Attachment A, which is incorporated herein by reference, that are required for completion of the AFH.
3. PCCA Responsibilities: Each PCCA member will be responsible for providing information about its respective policies and practices and other information as required by the consultant to complete the AFH. The County will provide the information to the consultant and provide the information for the unincorporated County. PCCA's will undertake the responsibilities set forth in Attachment A, which is incorporated herein by reference.
4. Remittance: The PCCA members will each remit their respective AFFH Consultant Fee contributions to the County upon receipt of an invoice(s) based on the approved project budget (Attachment A).
5. Records Retention: The County will keep all documents relating to the AFH readily accessible to the other PCCA members for at least ten years from the completion of the project.
6. Indemnification: Each PCCA member shall defend, hold harmless and indemnify each and every other PCCA member, their respective commissioners, members, officers, employees, and agents from any and all claims, loss, damage, injury, actions, causes of action and liability of every kind, nature, or description directly or indirectly arising out of or connected with its performance under this Agreement, and any of that PCCA member's operations or activities related thereto, excluding the willful misconduct or gross negligence of the person or entity seeking to be defended, indemnified or held harmless.

7. Amendment: This Agreement may be altered only by written consent of the signatory parties.
8. Term: The term of this Agreement shall begin on July 2, 2017 and end on October 31, 2019, and may be extended or amended based on mutual agreement.
 - a) This Agreement will automatically terminate if (i) the AFH is no longer required by HUD and/or the terms of the Agreement have been satisfied, and (ii) all outstanding invoices have been paid.
9. Counterparts: This Agreement may be executed in counterparts, each of which shall be deemed an original, and each of which shall constitute together one instrument. The counterparts will be binding on each of the parties, even though the various parties may have executed separate counterparts.

COUNTY OF ALAMEDA, a political subdivision of the State of California

BY: _____
XXXXXXXXXX
Community Development Agency
224 West Winton Avenue, Room
110
Hayward CA 94544-1215

Date: _____

Approved as to form:
XXXXXXXXXX, County Counsel

By: _____
XXXXXXXXXXXXXXXXXXXXX
Deputy County Counsel

By signing above, signatory warrants and represents that he/she executed this Agreement in his/her authorized capacity and that by his/her signature on this Agreement, he/she or the entity upon behalf of which he/she acted, executed this Agreement.

CITY OF ALAMEDA, a Municipal Corporation

BY: _____ DATE: _____
XXXXXXXXXX, City Manager

APPROVED AS TO FORM:

XXXXXXXXXXXX, Assistant City Attorney

By signing above, signatory warrants and represents that he/she executed this Agreement in his/her authorized capacity and that by his/her signature on this Agreement, he/she or the entity upon behalf of which he/she acted, executed this Agreement.

CITY OF FREMONT, a Municipal Corporation

BY: _____ DATE: _____
XXXXXXXXXXXX, Human Services
Director

APPROVED AS TO FORM:

XXXXXXXXXXXX – Senior Deputy City
Attorney II

By signing above, signatory warrants and represents that he/she executed this Agreement in his/her authorized capacity and that by his/her signature on this Agreement, he/she or the entity upon behalf of which he/she acted, executed this Agreement.

CITY OF HAYWARD, a Municipal Corporation

BY: _____ DATE: _____
XXXXXXXXXX, City Manager

ATTEST:

XXXXXXXXXX, City Clerk

APPROVED
AS TO FORM:

XXXXXXXXXX, City Attorney

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CITY OF LIVERMORE, a Municipal Corporation

BY: _____ DATE: _____
XXXXXXXXXX, Community and
Economic Development Director

APPROVED AS TO FORM:

XXXXXXXXXX, City Attorney

By signing above, signatory warrants and represents that he/she executed this Agreement in his/her authorized capacity and that by his/her signature on this Agreement, he/she or the entity upon behalf of which he/she acted, executed this Agreement.

CITY OF PLEASANTON, a Municipal Corporation

BY: _____ DATE: _____

XXXXXXXXXXXX, City Manager

APPROVED AS TO FORM:

XXXXXXXXXXXX, City Attorney

By signing above, signatory warrants and represents that he/she executed this Agreement in his/her authorized capacity and that by his/her signature on this Agreement, he/she or the entity upon behalf of which he/she acted, executed this Agreement.

CITY OF SAN LEANDRO, a Municipal Corporation

BY: _____ DATE: _____
XXXXXXXXXXXX, City Manager

ATTEST:

XXXXXXXXXXXX, City Clerk

APPROVED AS TO FORM:

XXXXXXXXXXXX, City Attorney

By signing above, signatory warrants and represents that he/she executed this Agreement in his/her authorized capacity and that by his/her signature on this Agreement, he/she or the entity upon behalf of which he/she acted, executed this Agreement.

CITY OF UNION CITY, a Municipal Corporation

BY: _____ DATE: _____
XXXXXXXXXX, City Manager

ATTEST:

XXXXXXXXXX, City Clerk

APPROVED AS TO FORM:

XXXXXXXXXX, City Attorney

By signing above, signatory warrants and represents that he/she executed this Agreement in his/her authorized capacity and that by his/her signature on this Agreement, he/she or the entity upon behalf of which he/she acted, executed this Agreement.

Housing Authority of the County of Alameda

BY: _____ DATE: _____
Christine Gouig, Executive Director

ATTEST:

XXXXXXXXXXXXX

By signing above, signatory warrants and represents that he/she executed this Agreement in his/her authorized capacity and that by his/her signature on this Agreement, he/she or the entity upon behalf of which he/she acted, executed this Agreement.

Housing Authority of the City of Alameda

BY: _____ DATE: _____
Vanessa Cooper, Executive
Director

XXXXXXXXXXXXX

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Housing Authority of the City of Berkeley

BY: _____ DATE: _____
William Wilkins, Executive Director

XXXXXXXXXXXXX

XXXXXXXXXXXXX, General Counsel

By signing above, signatory warrants and represents that he/she executed this Agreement in his/her authorized capacity and that by his/her signature on this Agreement, he/she or the entity upon behalf of which he/she acted, executed this Agreement.

Housing Authority of the City of Livermore

BY: _____ DATE: _____
Alfred Dulay, Executive Director

ATTEST:

XXXXXXXXXXXXX

APPROVED AS TO FORM:

XXXXXXXXXXXXX, General Counsel

By signing above, signatory warrants and represents that he/she executed this Agreement in his/her authorized capacity and that by his/her signature on this Agreement, he/she or the entity upon behalf of which he/she acted, executed this Agreement.

Housing Authority of the City of Oakland

BY: _____ DATE: _____
Eric Johnson, Executive Director

:

XXXXXXXXXXXX

By signing above, signatory warrants and represents that he/she executed this Agreement in his/her authorized capacity and that by his/her signature on this Agreement, he/she or the entity upon behalf of which he/she acted, executed this Agreement.

ATTACHMENT A

**Alameda County Participating County, Cities and Agencies (PCCA)
Inter-Governmental Agreement
Completion of the Assessment of Fair Housing**

**AFH CONSULTANT FEE CONTRIBUTION, PCCA ROLES AND RESPONSIBILITIES
AND AFH CONSULTANT SCOPE OF WORK**

1. Project Funding Sources

Contributions based upon a shared contribution of 65% of costs paid between the County and City Jurisdictions and 35% of costs paid between the Housing Authorities.

- The County and City Jurisdiction's 65% contribution will be prorated among jurisdictions based upon the percentage indicated in Table A below, which is based upon the respective Community Development Block Grant total allocation.
- Each Housing Authority's 35% contribution will be prorated among jurisdictions based upon a base fee of \$2,000 each, with any additional payment of funds prorated based on the percentage listed in Table B below, which is based upon HUD Annual Contributions Contract units.

Table A County and Cities	
County of Alameda	
• Urban County	8.91%
• HOME Consortium	11.66%
City of Alameda	5.64%
City of Berkeley	13.18%
City of Fremont	6.10%
City of Hayward	7.48%
City of Livermore	1.95%
City of Oakland	37.68%
City of Pleasanton	1.45%
City of San Leandro	3.46%
City of Union City	2.48%
Funds Available County and Cities	100% of 65%

Table B Housing Authorities (Agencies)	
County of Alameda HA	26%
City of Alameda HA	8%
Berkeley HA	8%
Livermore HA	3%
Oakland HA	55%
Funds Available Housing Authorities	100% of 35%
Total Contributions	100%

I. Estimated Project Budget

AFH Consultant

Funds Available: \$ 100,000

II. Roles and Responsibilities

III. AFH Consultant Scope of Work

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