



# HOUSTON HOUSING AUTHORITY

Transforming Lives & Communities

## **CHANGES TO THE 2016 ANNUAL PLAN:**

### **Changes to Housing Choice Voucher Administrative Plan**

#### **Eligibility (PG 16)**

Clarifying language was added to exclude applicants who have been previously terminated for cause, in order to allow applicants as eligible those:

1. Who voluntarily left the program, or
2. Who were not the individual that caused the termination (i.e. adult household members, usually children of HOH, who were not the cause of the term).

#### **Families Who Are Involuntarily Displaced By Government Action (PG 21)**

An applicant qualifies for this preference on the basis of involuntary permanent displacement if the applicant has been or will be involuntarily permanently displaced within no more than six months from the date of preference status certification or verification. An applicant is or will be involuntarily and permanently displaced if the applicant has vacated or will have to vacate the unit where the applicant lives because of activities carried on by Houston Housing Authority in connection with public improvements or development program.

#### **Under Housed Families Currently Living in Public Housing (PG21)**

Eligible Families include under-housed public housing families that have not been or will not be transferred to an appropriately sized unit within a reasonable time. Generally, reasonable time to wait for a transfer would be less than one year. Priority will be given to under housed families in the largest units (5 Bedrooms) first and then to Four bedrooms and continuing to progressively smaller units

#### **Choice Mobility Program Pilot preference (PG 21)**

This preference is limited to up to 30 public housing families per year. The participating families must be an eligible family and live in an eligible public housing development in an area which is a concentrated development. Eligible families include those that are in good standing with HHA, contain at least one family member under the age of 5 at the time of issuance, and utilize a voucher in an area of high opportunity.

#### **Subsidy Standards (PG 28)**

Language was added to allow the Vice President of the HCV program to make exceptions to the established subsidy standards if the Vice President determines the exception is justified by the family's circumstances.

#### **Voucher Extensions (Portability) (PG 31)**

Language was added to clarify under what conditions the HHA would extend a voucher for both incoming and outgoing portability transfers.

**HQS Inspections (3rd Inspection) (PG 36)**

Language was added to clarify that a third inspection would be offered if both the landlord and tenant agree for a landlord caused fail item, and at tenant request prior to a termination hearing for a tenant cause failure.

**Reasonable Accommodations (PG 77)**

Language was changed to reflect the Agency Consolidated Reasonable Accommodations policy and reference that policy as the controlling document. The entire policy was not included (but is incorporated by reference) due to the potential of confusion regarding references to public housing reasonable accommodations in the Voucher Administrative Plan

**Changes to Admissions and Continued Occupancy Plan (ACOP)****Updated References**

Changes were made to reference Section numbers that changed and references to procedures that had changed titles. The clean version will be reformatted to correctly re-number all sections.

**Rejecting Applicants (PG 4)**

Changes were made to clarify criminal background check, inability to get utility service, and failure to attend applicant orientation as means for rejection of an applicant.

**Good Cause for Unit Refusal (PG 4)**

A definition was added to clarify what constitutes good cause for an applicant refusing a unit, which includes that an applicant is willing but unable to move at the time of the unit offer.

**Verification (PG 5)**

The reference to verification procedure was replaced with a reference to the HUD procedures outlined in PIH Notice 2010-19.

**Preferences (PG 5)**

The working preference is removed because the work status of the families is not reliable and is difficult to accurately verify until after selection from the waiting list. The police officer preference was changed to charge no rent as long as the officer is using the units as his or her only place of residence.

**Existing families living in a units placed under ACC (PG 8)**

Families who currently live in a unit at the time HHA places the property under ACC will be given the highest preference for occupancy of the unit to avoid displacements.

**Applicant Screening (PG 10)**

The screening criteria were clarified and streamlined to remove certain items that were difficult to verify and might lead to more arbitrary screening decisions. Removed provisions included the ability to pay rent, the ability to avoid damage, ability to reasonably use the facilities, ability to avoid creating hazards and report maintenance, and ability to preserve peaceful enjoyment. These are all lease provisions and would be enforced through that mechanism.

**Site Based Waiting List (PG 13)**

Language regarding the site based waiting list was removed until such time that HHA can implement the process of implementation.

**Lease Attachments (PG 16)**

A comprehensive list of current lease attachments was incorporated by reference into the policy.

**Leasing Provisions (PG 16)**

Certain provisions were removed from the policy that are already included in the lease and it was replaced with a statement requiring participants to adhere to all terms and conditions of the lease.

**Additions and Deletions from the Household (PG 16)**

Clarifying language was included that HHA will not add new members if it will exceed the maximum limit for the unit.

**Visitors (PG 16)**

Clarified that visitors are allowed in accordance with lease provisions and that HHA will not a list of prohibited visitors for public view.

**Smoking (PG 17)**

The policy is clarified to allow smoking in designated areas not within 25 feet of the main entrance of a community space.

**Community Service (PG 17)**

This policy was moved and updated to indicate that exempt working families are those that work at least 30 hours per week, and that disabled families need to be unable to complete community service to be exempt.

**Transfers (PG 28)**

This change created a distinction between HHA initiated emergency transfers and Resident initiated emergency transfers. The previous language could have been interpreted to require that any resident initiated request would not be treated as an emergency. Priority levels were also clarified to accomplish the same goal of allowing resident initiated emergency transfers highest priority. This clarifies that issues of domestic violence and similar life endangering resident protection issues will take the same priority as emergency transfers due physical unit and building emergencies.

**Record keeping (PG 33)**

The recordkeeping requirements were streamlined to the HUD recommendation for what a PHA should retain. While HHA will retain additional documents, not in all cases do all of the documents exist and the policy appeared to required retention of documents that may not be applicable in all instances.

**Reasonable Accommodation (PG 38)**

The policy was replaced with the updated proposed policy.

## **Language Assistance (PG 49)**

The policy was update to state that HHA will provide written translations of vital documents.

## **Changes Relative to Modernization or Development**

### **5 Year Plan**

The 2016 FY plan incorporates the 5 years Goals and Strategies for HHA from FY2016-2020, these can be found in Section 5 progress reports and these goals will be included in Section 10 in future years.

## **Development**

### **Acquisition**

The Plan also included Acquisition of high opportunity sites.

### **RAD**

RAD was removed from the 2016 plan and replaced with Public Housing units at Sweetwater, Mansions at Turkey Creek and Villas at Winkler.

## **Choice Neighborhoods**

The Plan continued to reflect that HHA will apply for a Choice Neighborhoods Planning Grant for Cuney Homes.

## **Project Based Vouchers**

The Plan continues to commit 1,000 total vouchers to project based permanent supportive housing.

## **Capital Fund Planning**

Capital Projects have been identified for inclusion into the Capital Budget, we are in the process of tying projects to years of funds available under the Capital Fund Program. The Capital Budget will reflect an increase in capital projects at existing properties while having funds available for new public housing development activities.

## **Goals and Strategies**

### **HHA Goal I: Expand efforts to ensure equal opportunity in housing by:**

- Strategy: Reduce operational barriers that may hinder access to programs it administers.
- Strategy: Reduce language barriers that may hinder access to programs it administers.
- Strategy: Ensure compliance with ADA requirements when constructing new and renovating existing units.
- Strategy: Increase housing choice and mobility.
- Strategy: Continue education of Fair Housing Laws.

### **HHA Goal II: Increase the quantity and quality of housing**

- Strategy: Acquisition and new development of affordable housing.
- Strategy: Modernize, rebuild, and/or demolish (if it can be replaced) aging units incrementally through the Capital Fund Program and other sources as available.
- Strategy: Seek additional vouchers through the Housing Choice Voucher Program and other special programs that may be available.

**HHA Goal III: Seek to improve community quality of life and self- sufficiency:**

- Strategy: Provide services to residents, including youth, families, and seniors living in public housing and senior developments to enhance their quality of life.
- Strategy: Create well-functioning communities with low crime and good neighbors.
- Strategy: Provide Family Self-Sufficiency Programs for eligible Section 8 Housing Choice Voucher Program and Public Housing participants pursuant to applicable regulations and available funding.
- Strategy: Increase Minority & Women Business Enterprises (MWBE) and Section 3 participation.

**HHA Goal IV: Improve relationships with clients and external stakeholders:**

- Strategy: Increase our client agency relationships.
- Strategy: Promote partnerships with other Housing Authorities.
- Strategy: Utilize the Public Relations (PR) firm for positive publicity and perceptions.

**HHA Goal V: Improve agency performance:**

- Strategy: Seek other funding streams.
- Strategy: Improve the physical work environment.
- Strategy: Invest in human capital.
- Strategy: Increase interdepartmental collaboration and communication.
- Strategy: Seek new innovations.

**COMMENT PERIOD:**

HUD requires a 45-day public comment period, HHA’s comment period started on July 21, 2015 and ended on September 7, 2015. Gathering input from the public on each year’s Annual Plan is an integral part of the Plan development process. HHA held three public meetings and one Resident Council Leadership meeting, though HUD only requires one, to provide opportunities for residents, voucher holders, and other community members to provide feedback on, and ask questions about the HHA’s plans for the coming plan year. The comments below are listed by meeting location with the HHA responses to each question listed.

### **Resident Council Leadership Meeting-Comments Summary**

**Comment:** Two residents are in favor of the mobility preference.

**HHA Response:** HHA will pursue appropriate HUD Waivers and approvals to implement this preference.

**Comment:** One resident suggested that the Resident Advisory Board be included in the planning process of the annual plan not just the public comment period.

**HHA Response:** We are always taking suggestions from residents, they can submit comments and suggestions to HHA any time throughout the year.

**Comment:** A resident suggested that HHA pursue stricter enforcement of the lease terms/policies.

**HHA Response:** HHA will enforce lease violations strictly when there is enough information to determine that a violation has occurred.

### **Three Additional Public Comment Meetings - Comments Summary**

**Comment:** Eight residents made comments about different capital improvements at each property to be made.

**HHA Response:** HHA has noted the feedback from the residents and will put them into the capital improvements plan. Based on the physical needs assessment that will be completed this fall the capital improvements will begin in accordance to the highest priority.

**Comment:** One resident commented on their support for HHA's development opportunities

**HHA Response:** We thank the commenter for their support.

**Comment:** One Resident commented that Resident Council members should be paid for their time.

**HHA Response:** Resident Council positions are volunteer and the members serve at the will of the residents, at this time HHA will not propose a stipend for resident council leaders.

### **Other Comments Received**

**Comment:** HHA staff has considered all of the comments submitted regarding the FY2016 Plan and believes that they are provide insightful and thoughtful analyses of some HHA processes and procedures. The comments also inquire about additional detailed information and clarifications at a level that is not traditionally included in a PHA Plan document.

As a part of the Houston Housing Authority's annual and five year plans, I'd like to encourage HHA to prioritize, and commit more resources towards, (1) installing solar panels on its properties as well as (2) giving your residents access to skills training opportunities to be able to work in the solar industry. The rapid decline of solar panel costs in recent years has ushered in a solar boom that has not spread uniformly across the spectrum of U.S. household incomes. Despite being more vulnerable to energy costs, lower income Americans have lagged behind more affluent households in adopting solar and realizing its numerous benefits. Further, both the solar workforce and value of solar projects are increasing each year. There are nearly 174,000 solar workers in the US, more than a 20% increase over employment totals in 2013.

As a result, the Obama Administration recently unveiled executive orders to improve access to solar for low income families and increase the number of solar workers from low income communities. Solar, and other renewable energy sources, should be a key component of HHA's future as a means to reduce your carbon footprint, decrease energy costs and provide a career path for community residents. Resources within HUD and the Department of Energy should be explored to assist with capital costs associated with solar installation and self-sufficiency training opportunities.