ITEM NO. 30

STAFF REPORT

CITY OF OCEANSIDE

DATE: March 13, 2013

TO: Chairman and Members of the Community Development Commission

FROM: Neighborhood Services Department

SUBJECT: **RESOLUTION APPROVING THE PUBLIC HOUSING AGENCY (PHA) PLAN**

SYNOPSIS

Staff recommends that the Community Development Commission (CDC) adopt a resolution approving the 2013-2014 Annual Public Housing Agency (PHA) Plan and authorize the CDC Chairman to submit the plans to the Department of Housing and Urban Development (HUD) with the inclusion of changes made to the PHA Plan as a result of public comments, and execute all related documents.

BACKGROUND

The CDC currently administers the Section 8 Housing Choice Voucher Program; the program provides rental assistance benefits to approximately 1,600 low-income Oceanside households. The primary goal of the program is to assist as many households as possible with the funding provided. In addition, up to 100 of the assisted households also participate in the Family Self-Sufficiency Program.

HUD established a requirement for PHAs to submit PHA plans beginning in Federal Fiscal Year 2000. Housing Authorities have flexibility and discretion to use federal funding to address the needs of low-income families. The PHA Plan is Congress's way of ensuring that the PHA is accountable to the local community for choices it makes with this flexibility. These plans are required to be approved by the CDC at a published public hearing. The Five-Year Plan for 2010-2015 was submitted in April 2010. PHAs are required to submit both a five-year plan outlining the agency's mission and goals, and a one-year plan highlighting the agency's operations, programs and services. This plan is the Annual Plan for 2013-2014. Housing authorities that operate Section 8 Housing Choice Voucher (HCV) Programs are permitted to submit streamlined plans to HUD. Streamlined plans require limited information to be submitted to HUD; other information must be available for public review.

The CDC is required to develop a FSS Action Plan, which guides the FSS Program operations. Any revisions to the FSS Action Plan must be included in the PHA's Annual Plan. Families in the program execute a contract that specifies goals and services; the contract requires that all members become independent of welfare and maintain suitable employment. FSS Coordinators ensure that the program participants are linked to the supportive services they need to achieve self-sufficiency.

ANALYSIS

Federal regulations require that a Resident Advisory Board (RAB) participate in the planning process and assist and make recommendations regarding the PHA Plan. Three voucher participants volunteered to serve on the RAB. The RAB met on November 14, 2012. PHAs are required to consider the RAB's recommendations to the Plan, but are not required to agree with them. Any comments submitted by the RAB will be addressed in the Annual Plan submitted to HUD. Two recommendations have been received. The first recommendation was to, "write rules re: how to reduce program participation due to reduction in funding." The second recommendation was, "review all procedures with an eye toward online forms completion for program participants." Staff has revised the program guidelines to address termination of Housing Assistance Payment Contracts and vouchers in the event that there is insufficient funding. Staff has also formed a committee to research and implement technologies that could improve efficiencies; online forms completion for program participants will be evaluated in the future.

PHAs are required to conduct a Public Hearing after a forty-five-day comment period that will end on March 1, 2013. The Public Hearing will be conducted at the March 13, 2013, CDC meeting. HUD regulations require approval of the Plans by the CDC. The draft Plan has been made available for review at the Neighborhood Services Department offices and on the City's website. Public comment has been requested through an advertisement in the North County Times. The City is required to consider written comments, as well as those comments made at the Public Hearing.

The PHA's goals and objectives are identified on page one of the previously approved 2010-2015 plan. The primary goal of the program is to assist as many households as possible with the funding provided. The PHA achieved a 99 percent unit utilization rate for Calendar Year 2012. The PHA has also applied for additional vouchers whenever they are available.

The PHA Plan elements that have been revised since the last Annual Plan submission are addressed on page one of the plan.

As the Family Self-Sufficiency Program Action Plan has not been revised for many years, the following changes are recommended by staff.

- Participant households with active FSS contracts transferring their Section 8 assistance to Oceanside will have a preference to participate in Oceanside's FSS Program over non-FSS households. (page 4)
- Individuals who have successfully completed a FSS Contract of Participation and received escrow funds of $5,000 or less may be allowed to enroll in FSS a second time at the discretion of the PHA. (page 5)

FISCAL IMPACT

Funding for the Section 8 HCV Program is appropriated on a calendar year basis and Congress has not adopted a budget; therefore, funding is currently unknown. If funding is determined using the same formula as Calendar Year 2012, funding for 2013 is expected to increase to $15,314,082, which is sufficient to continue assisting all households currently participating in the program. However, if a reduction in funding of approximately 5.1 percent occurs due to sequestration, the PHA will need to reduce program costs by reducing Housing Assistance Payments to participants or reducing the number of program participants or a combination of both. A reduction in funding will likely necessitate a reduction in budgeted positions.

COMMISSION OR COMMITTEE REPORT

At its February 26, 2013 meeting, the Housing Commission unanimously recommended that the CDC adopt a resolution approving submission of the 2013-2014 Annual Public Housing Agency Plan to HUD with the inclusion of revisions made to the plan based on public comments.

CITY ATTORNEY'S ANALYSIS

The referenced documents have been reviewed by the City Attorney and approved as to form.

RECOMMENDATION

Staff recommends that the CDC adopt a resolution approving the 2013-2014 Annual Public Housing Agency Plans and authorize the CDC Chairman to submit the plans to HUD with the inclusion of changes made to the PHA Plan as a result of public comments, and execute all related documents.

PREPARED BY:

Angela D. Hanifin
Housing Program Manager

SUBMITTED BY:

Peter A. Weiss
Executive Director

REVIEWED BY:

Michelle Lawrence, Deputy City Manager

Margery M. Pierce, Director of Neighborhood Services

Attachment 1: Resolution
Attachment 2: Draft PHA Plan for 2013-14
Attachment 3: Statement of Financial Resources for 2013-14
Attachment 4: Violence Against Women Act Statement
Attachment 5: Five-Year PHA Plan for 2010-2015
Attachment 6: Family Self-Sufficiency Action Plan

ATTACHMENT 1

RESOLUTION NO._____

A RESOLUTION OF THE COMMUNITY DEVELOPMENT COMMISSION OF THE CITY OF OCEANSIDE (CA 132) APPROVING THE 2013-2014 ANNUAL PUBLIC HOUSING AGENCY (PHA) PLANS FOR THE PHA FISCAL YEAR BEGINNING JULY 1, 2013 AND AUTHORIZING THE COMMUNITY DEVELOPMENT COMMISSION CHAIRMAN TO SUBMIT THE PHA PLAN TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD) AND EXECUTE ALL RELATED DOCUMENTS.

WHEREAS, the Community Development Commission (CDC) of the City of Oceanside (CA 132) administers a Section 8 Housing Choice Voucher (Rental Assistance) Program consisting of approximately 1,600 vouchers;

WHEREAS, HUD has issued regulations requiring PHAs to submit 5-Year and Annual PHA Plans beginning in Fiscal Year 2000;

WHEREAS, a Resident Advisory Board met on November 14, 2012 regarding the PHA Plan;

WHEREAS, PHAs are required to conduct a Public Hearing after a forty-five day comment period;

WHEREAS, a Public Hearing was conducted at the March 13, 2013 Community Development Commission meeting;

WHEREAS, HUD regulations require that the Board of Commissioners of the PHA approve the submission of the PHA Plan to HUD;

WHEREAS, HUD requires that certifications and agreements be submitted with the PHA Plan.

NOW, THEREFORE, the Community Development Commission of the City of Oceanside does resolve as follows:

1. The submission of the 2013-2014 Annual PHA Plan to HUD is hereby approved.

2. The Community Development Commission Chairman is authorized to

submit the PHA Plan and make the following certifications and agreements with HUD in connection with submission of the plan and implementation thereof:

a. The Five-Year and Annual Plans are consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.

b. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.

c. The PHA certifies that there has been no change, significant or otherwise, to the Capital Fund Program (and Capital Fund Program/Fund Replacement Housing Factor) Annual Statement(s), since submission of its last approved Annual Plan. The Capital Fund Program Annual Statement/Annual Statement/Performance and Evaluation Report must be submitted annually even if there is no change.

d. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.

e. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.

f. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Acts of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act

of 1990.

g. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.

h. For PHA Plan that includes a policy for site based waiting lists:

- The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2006-24);
- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
- Adoption of site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
- The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing;
- The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).

i. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.

j. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically

Handicapped.

k. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

l. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

m. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

n. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.

o. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

p. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

q. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.

r. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).

s. The PHA will undertake only activities and programs covered by

the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.

t. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the streamlined Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.

u. The PHA provides assurance as part of this certification that:

(i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;

(ii) The changes were duly approved by the PHA board of directors (or similar governing body); and

(iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.

v. The PHA certifies that it is in compliance with all applicable Federal statutory and regulatory requirements.

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3. Acting on behalf of the Board of Commissioners of the Community Development Commission of the City of Oceanside (CA 132) , the Chairman certifies that all the information stated herein for the Annual PHA Plan for Fiscal Year 2013-2014, as well as any information provided in the accompaniment herewith is true and accurate.

PASSED AND ADOPTED by the Community Development Commission of the City of Oceanside, this _____ day of _____, 2013, by the following vote:

AYES:

NAYES:

ABSENT:

ABSTAIN:

_____
CHAIRMAN

ATTEST:

_____
SECRETARY

APPROVED AS TO FORM:

_____
GENERAL COUNSEL

PHA 5-Year and Annual Plan	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 4/30/2011

1.0 PHA Information
PHA Name: City of Oceanside Community Development Commission PHA Code: CA 132
PHA Type: ☐ Small ☒ High Performing ☐ Standard ☒ HCV (Section 8)
PHA Fiscal Year Beginning: (MM/YYYY): 07/01/2013

2.0 Inventory (based on ACC units at time of FY beginning in 1.0 above)
Number of PH units: 0 Number of HCV units: 1,361

3.0 Submission Type
☐ 5-Year and Annual Plan ☒ Annual Plan Only ☐ 5-Year Plan Only

4.0 PHA Consortia ☐ PHA Consortia: (Check box if submitting a joint Plan and complete table below.)

Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program	
				PH	HCV
PHA 1:					
PHA 2:					
PHA 3:					

5.0 5-Year Plan. Complete items 5.1 and 5.2 only at 5-Year Plan update.

5.1 Mission. State the PHA's Mission for serving the needs of low-income, very low-income, and extremely low income families in the PHA's jurisdiction for the next five years:

5.2 Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

6.0 PHA Plan Update

(a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission:

1) Financial Resources: The statement of resources is attached.
2) Community Service and Self-Sufficiency: The revised Family Self- Sufficiency Action Plan is attached.
3) Fiscal Year Audit: The Audit for the Fiscal Year ending June 30, 2011 is available at the Neighborhood Services Department offices.

(b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions.
Main administrative office of the PHA and the City website at www.oceansideha.com.

7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. The PHA currently has 13 households participating in the Section 8 Homeownership option.
Project-Based Vouchers: The PHA entered into a ten-year HAP Contract effective 9-1-08 with Community Housing Works to provide project-based assistance for 21 units at Marisol Apartments located at 1119 S. Tremont St., Oceanside. The PHA entered into another ten-year contract effective 9-1-08 with Community Housing Works to provide project-based assistance for four units at Old Grove Apartments located at 235 Pelicano, Oceanside. All PBV are designated for persons with disabilities.

8.0 Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable.

8.1 Capital Fund Program Annual Statement/Performance and Evaluation Report. As part of the PHA 5-Year and Annual Plan, annually complete and submit the *Capital Fund Program Annual Statement/Performance and Evaluation Report,* form HUD-50075.1, for each current and open CFP grant and CFFP financing.

8.2 Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the *Capital Fund Program Five-Year Action Plan,* form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan.

8.3 Capital Fund Financing Program (CFFP).
☐ Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements.

9.0	**Housing Needs**. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. There are currently more than 5,500 households on the waiting list. The average wait for assistance for applicants with the highest priority (live or work in Oceanside and family, elderly and/or disabled) is currently approximately six and a half years.

9.1	**Strategy for Addressing Housing Needs**. Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. **The PHA will apply for any possible funding and will also utilize vouchers to the greatest extent possible. The PHA achieved a 99.3% utilization (lease-up) rate for Calendar Year 2012.**
10.0	**Additional Information**. Describe the following, as well as any additional information HUD has requested. (a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan. High performers complete only for Annual Plan submitted with the 5-Year Plan (b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification": High performers complete only for Annual Plan submitted with the 5-Year Plan (c) Information about the PHA's activities, services and programs related to the Violence Against Women Act is provided as Attachment 4.

11.0	**Required Submission for HUD Field Office Review**. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. **Note:** Faxed copies of these documents will not be accepted by the Field Office. (a) Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations* (which includes all certifications relating to Civil Rights) (b) Form HUD-50070, *Certification for a Drug-Free Workplace* (PHAs receiving CFP grants only) (c) Form HUD-50071, *Certification of Payments to Influence Federal Transactions* (PHAs receiving CFP grants only) (d) Form SF-LLL, *Disclosure of Lobbying Activities* (PHAs receiving CFP grants only) (e) Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet* (PHAs receiving CFP grants only) (f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations. (g) Challenged Elements (h) Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report* (PHAs receiving CFP grants only) (i) Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan* (PHAs receiving CFP grants only)

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced 5-Year and Annual PHA Plans. The 5-Year and Annual PHA plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission and strategies for serving the needs of low-income and very low-income families. This form is to be used by all PHA types for submission of the 5-Year and Annual Plans to HUD. Public reporting burden for this information collection is estimated to average 12.68 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. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality

Instructions form HUD-50075

Applicability. This form is to be used by all Public Housing Agencies (PHAs) with Fiscal Year beginning April 1, 2008 for the submission of their 5-Year and Annual Plan in accordance with 24 CFR Part 903. The previous version may be used only through April 30, 2008.

1.0 PHA Information
Include the full PHA name, PHA code, PHA type, and PHA Fiscal Year Beginning (MM/YYYY).

2.0 Inventory
Under each program, enter the number of Annual Contributions Contract (ACC) Public Housing (PH) and Section 8 units (HCV).

3.0 Submission Type
Indicate whether this submission is for an Annual and Five Year Plan, Annual Plan only, or 5-Year Plan only.

4.0 PHA Consortia
Check box if submitting a Joint PHA Plan and complete the table.

5.0 Five-Year Plan
Identify the PHA's Mission, Goals and/or Objectives (24 CFR 903.6). Complete only at 5-Year update.

5.1 Mission. A statement of the mission of the public housing agency for serving the needs of low-income, very low-income, and extremely low-income families in the jurisdiction of the PHA during the years covered under the plan.

5.2 Goals and Objectives. Identify quantifiable goals and objectives that will enable the PHA to serve the needs of low income, very low-income, and extremely low-income families.

6.0 PHA Plan Update. In addition to the items captured in the Plan template, PHAs must have the elements listed below readily available to the public. Additionally, a PHA must:

(a) Identify specifically which plan elements have been revised since the PHA's prior plan submission.

(b) Identify where the 5-Year and Annual Plan may be obtained by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central off ice of the PHA. PHAs are strongly encouraged to post complete PHA Plans on its official website. PHAs are also encouraged to provide each resident council a copy of its 5-Year and Annual Plan.

PHA Plan Elements. (24 CFR 903.7)

1. **Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures.** Describe the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV and unit assignment policies for public housing; and procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists.

2. **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA Operating, Capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources.

3. **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units.

4. **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA.

5. **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants.

6. **Designated Housing for Elderly and Disabled Families.** With respect to public housing projects owned, assisted, or operated by the PHA, describe any projects (or portions thereof), in the upcoming fiscal year, that the PHA has designated or will apply for designation for occupancy by elderly and disabled families. The description shall include the following information: **1**) development name and number; **2**) designation type; **3**) application status; **4**) date the designation was approved, submitted, or planned for submission, and; **5**) the number of units affected.

7. **Community Service and Self-Sufficiency.** A description of: **(1)** Any programs relating to services and amenities provided or offered to assisted families; **(2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS; **(3)** How the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. **(Note: applies to only public housing).**

8. **Safety and Crime Prevention.** For public housing only, describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must include: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities

conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities.

9. **Pets.** A statement describing the PHAs policies and requirements pertaining to the ownership of pets in public housing.

10. **Civil Rights Certification.** A PHA will be considered in compliance with the Civil Rights and AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction.

11. **Fiscal Year Audit.** The results of the most recent fiscal year audit for the PHA.

12. **Asset Management.** A statement of how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory.

13. **Violence Against Women Act (VAWA).** A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families.

7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers

(a) Hope VI or Mixed Finance Modernization or Development. **1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Mixed Finance Modernization or Development; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI, Mixed Finance Modernization or Development, is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm

(b) Demolition and/or Disposition. With respect to public housing projects owned by the PHA and subject to ACCs under the Act: **(1)** A description of any housing (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and **(2)** A timetable for the demolition or disposition. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm
Note: This statement must be submitted to the extent **that approved and/or pending** demolition and/or disposition has changed.

(c) Conversion of Public Housing. With respect to public housing owned by a PHA: **1)** A description of any building or buildings (including project number and unit count) that the PHA is required to convert to tenant-based assistance or that the public housing agency plans to voluntarily convert; **2)** An analysis of the projects or buildings required to be converted; and **3)** A statement of the amount of assistance received under this chapter to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/conversion.cfm

(d) Homeownership. A description of any homeownership (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval.

(e) Project-based Vouchers. If the PHA wishes to use the project-based voucher program, a statement of the projected number of project-based units and general locations and how project basing would be consistent with its PHA Plan.

8.0 Capital Improvements. This section provides information on a PHA's Capital Fund Program. With respect to public housing projects owned, assisted, or operated by the public housing agency, a plan describing the capital improvements necessary to ensure long-term physical and social viability of the projects must be completed along with the required forms. Items identified in 8.1 through 8.3, must be signed where directed and transmitted electronically along with the PHA's Annual Plan submission.

8.1 Capital Fund Program Annual Statement/Performance and Evaluation Report. PHAs must complete the *Capital Fund Program Annual Statement/Performance and Evaluation Report* (form HUD-50075.1), for each Capital Fund Program (CFP) to be undertaken with the current year's CFP funds or with CFFP proceeds. Additionally, the form shall be used for the following purposes:

(a) To submit the initial budget for a new grant or CFFP;

(b) To report on the Performance and Evaluation Report progress on any open grants previously funded or CFFP; and

(c) To record a budget revision on a previously approved open grant or CFFP, e.g., additions or deletions of work items, modification of budgeted amounts that have been undertaken since the submission of the last Annual Plan. The Capital Fund Program Annual Statement/Performance and Evaluation Report must be submitted annually.

Additionally, PHAs shall complete the Performance and Evaluation Report section (see footnote 2) of the *Capital Fund Program Annual Statement/Performance and Evaluation* (form HUD-50075.1), at the following times:

1. At the end of the program year; until the program is completed or all funds are expended;

2. When revisions to the Annual Statement are made, which do not require prior HUD approval, (e.g., expenditures for emergency work, revisions resulting from the PHAs application of fungibility); and

3. Upon completion or termination of the activities funded in a specific capital fund program year.

8.2 Capital Fund Program Five-Year Action Plan

PHAs must submit the *Capital Fund Program Five-Year Action Plan* (form HUD-50075.2) for the entire PHA portfolio for the first year of participation in the CFP and annual update thereafter to eliminate the previous year and to add a new fifth year (rolling basis) so that the form always covers the present five-year period beginning with the current year.

8.3 Capital Fund Financing Program (CFFP). Separate, written HUD approval is required if the PHA proposes to pledge any portion of its CFP/RHF funds to repay debt incurred to finance capital improvements. The PHA must identify in its Annual and 5-year capital plans the amount of the annual payments required to service the debt. The PHA must also submit an annual statement detailing the use of the CFFP proceeds. See guidance on HUD's website at: http://www.hud.gov/offices/pih/programs/ph/capfund/cffp.cfm

9.0 Housing Needs. Provide a statement of the housing needs of families residing in the jurisdiction served by the PHA and the means by which the PHA intends, to the maximum extent practicable, to address those needs. **(Note:** Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).

9.1 Strategy for Addressing Housing Needs. Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. **(Note:** Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).

10.0 Additional Information. Describe the following, as well as any additional information requested by HUD:

(a) Progress in Meeting Mission and Goals. PHAs must include (i) a statement of the PHAs progress in meeting the mission and goals described in the 5-Year Plan; (ii) the basic criteria the PHA will use for determining a significant amendment from its 5-year Plan; and a significant amendment or modification to its 5-Year Plan and Annual Plan. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**

(b) Significant Amendment and Substantial Deviation/Modification. PHA must provide the definition of "significant amendment" and "substantial deviation/modification". **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan.)**

(c) PHAs must include or reference any applicable memorandum of agreement with HUD or any plan to improve performance. **(Note: Standard and Troubled PHAs complete annually).**

11.0 Required Submission for HUD Field Office Review. In order to be a complete package, PHAs must submit items (a) through (g), with signature by mail or electronically with scanned signatures. Items (h) and (i) shall be submitted electronically as an attachment to the PHA Plan.

(a) Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*

(b) Form HUD-50070, *Certification for a Drug-Free Workplace* **(PHAs receiving CFP grants only)**

(c) Form HUD-50071, *Certification of Payments to Influence Federal Transactions* **(PHAs receiving CFP grants only)**

(d) Form SF-LLL, *Disclosure of Lobbying Activities* **(PHAs receiving CFP grants only)**

(e) Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet* **(PHAs receiving CFP grants only)**

(f) Resident Advisory Board (RAB) comments.

(g) Challenged Elements. Include any element(s) of the PHA Plan that is challenged.

(h) Form HUD-50075.1, ***Capital Fund Program Annual Statement/Performance and Evaluation Report*** **(Must be attached electronically for PHAs receiving CFP grants only).** See instructions in 8.1.

(i) Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan* **(Must be attached electronically for PHAs receiving CFP grants only).** See instructions in 8.2.

Attachment 3
CITY OF OCEANSIDE CDC PHA PLAN 2013-2014

Statement of Financial Resources
[24 CFR Part 903.12 (b), 903.7 (c)]

Financial Resources: Planned Sources and Uses		
Sources	**Planned $**	**Planned Uses**
1. **Federal Grants (CY 2013 grants)**		
a) Public Housing Operating Fund	N/A	
b) Public Housing Capital Fund	N/A	
c) HOPE VI Revitalization	N/A	
d) HOPE VI Demolition	N/A	
e) Annual Contributions for Section 8 Tenant-Based Assistance	$15,176,122	
f) Resident Opportunity and Self-Sufficiency Grants **FSS COORDINATOR GRANTS**	$ 137,360	
g) Community Development Block Grant	N/A	
h) HOME	N/A	
Other Federal Grants (list below)		
Disaster Housing Assistance Program	N/A	
2. Prior Year Federal Grants (unobligated funds only) (list below)	N/A	
3. Public Housing Dwelling Rental Income	N/A	
4. Other income (list below)	N/A	
4. Non-federal sources (list below)	N/A	
Total resources	$15,314,082	

*Based on CY 2012 budget using HUD Forecasting Tool. If sequestration occurs, there will be an 5.1% decrease in HAP and Administrative Fees. Assumptions: 99% funding for HAP and 80% funding for Administrative Fees.

ATTACHMENT 4

VIOLENCE AGAINST WOMEN ACT (VAWA)

ATTACHMENT TO ANNUAL PHA PLAN FOR 2013-14

The City of Oceanside Community Development Commission (CDC), the Housing Authority, complies with VAWA and has advised staff of outside resources available to child and adult victims of domestic violence, dating violence, sexual assault or stalking. Staff has been directed to provide referrals to outside agencies that provide such services, including the Women's Resource Center, which is located in Oceanside and provides domestic violence services in the Housing Authority service area.

The PHA provides information about VAWA to new voucher participants at the program briefing. In addition, information about VAWA is available in the PHA lobby and on the PHA website. All PHA staff has been trained about VAWA and provide information about VAWA rights and domestic violence resources to participants when notified that domestic violence is occurring in an assisted household.

PHA 5-Year and Annual Plan	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 4/30/2011

1.0 PHA Information
PHA Name: City of Oceanside Community Development Commission PHA Code: CA 132
PHA Type: ☐ Small ☒ High Performing ☐ Standard ☒ HCV (Section 8)
PHA Fiscal Year Beginning: (MM/YYYY): 07/01/2010

2.0 Inventory (based on ACC units at time of FY beginning in 1.0 above)
Number of PH units: 0 Number of HCV units: 1,313

3.0 Submission Type
☒ 5-Year and Annual Plan ☐ Annual Plan Only ☐ 5-Year Plan Only

4.0 PHA Consortia ☐ PHA Consortia: (Check box if submitting a joint Plan and complete table below.)

Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program	
				PH	HCV
PHA 1:					
PHA 2:					
PHA 3:					

5.0 5-Year Plan. Complete items 5.1 and 5.2 only at 5-Year Plan update.

5.1 Mission. State the PHA's Mission for serving the needs of low-income, very low-income, and extremely low income families in the PHA's jurisdiction for the next five years:

Implement the Community Development Commission's policy regarding housing assistance for low and moderate-income households.

5.2 Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

GOALS:
1. Expand the supply of assisted housing
   OBJECTIVE: Apply for additional Housing Choice Vouchers if funding is available.
2. Improve Voucher Management
   OBJECTIVE: Maintain High Performer Status
3. Promote Self-Sufficiency of assisted households
   OBJECTIVE: Assist 100 HCV households with the FSS Program.
   OBJECTIVE: Provide written information about community resources to new participants at briefings and in the Housing Authority lobby. Information shall be provided regarding community social service agencies, utility programs for low-income households and Recycling information.

A Progress Report on the PHA Plan for 2005-2010 is included as Attachment 3.

6.0 PHA Plan Update

(a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission:
1) Eligibility, Selection and Admissions Policies: A preference for admission has been added for participants in the Mobile Home Rental Assistance Program (MRAP) with high Housing Assistance Payments. MRAP is being phased out as participants voluntarily Terminate their assistance or become eligible for a Voucher. The Section 8 Administrative Plan includes the HAs eligibility, selection and Admissions policies
2) Financial Resources: The statement of resources provided as Attachment 4.
11) Fiscal Year Audit: The Audit is available at the Housing Department offices..
13) The PHA complies with VAWA and has advised staff of outside resources available to child or adult victims of domestic violence, dating Violence, sexual assault or stalking. Staff has been directed to provide referrals to outside agencies that provide such services, including Women's Resource Center, which is located in Oceanside and provides domestic violence services in the PHA service area.

(b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions.
Main administrative office of the PHA and the City website www.ci.oceanside.ca.us.

7.0	**Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers.** The PHA currently has 13 households participating in the Section 8 Homeownership option. Project-Based Vouchers: The PHA entered into a ten-year HAP Contract effective 9-1-08 with Community Housing Works to provide project-based assistance for 21 units at Marisol Apartments located at 1119 S. Tremont St., Oceanside. The PHA entered into another ten-year contract effective 9-1-08 with Community Housing Works to provide project-based assistance for four units at Old Grove Apartments located at 235 Pelicano, Oceanside. All PBV are designated for persons with disabilities.
8.0	**Capital Improvements.** Please complete Parts 8.1 through 8.3, as applicable.
8.1	**Capital Fund Program Annual Statement/Performance and Evaluation Report.** As part of the PHA 5-Year and Annual Plan, annually complete and submit the *Capital Fund Program Annual Statement/Performance and Evaluation Report,* form HUD-50075.1, for each current and open CFP grant and CFFP financing.
8.2	**Capital Fund Program Five-Year Action Plan.** As part of the submission of the Annual Plan, PHAs must complete and submit the *Capital Fund Program Five-Year Action Plan,* form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan.
8.3	**Capital Fund Financing Program (CFFP).** ☐ Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements.
9.0	**Housing Needs**. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. There are currently more than 4,100 households on the waiting list.. The average wait for assistance for applicants with the highest priority (live or work in Oceanside and family, elderly and/or disabled) is currently five years.

9.1	**Strategy for Addressing Housing Needs**. Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. **The PHA will apply for any possible funding and will also utilize vouchers to the greatest extent possible. The PHA achieved a 99.9% utilization (lease-up) rate for Calendar Year 2009.**
10.0	**Additional Information**. Describe the following, as well as any additional information HUD has requested. (a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan. See Attachment 3 (b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification": Any change that will substantially negatively impact a majority of Section 8 participants or Waiting list applicants, unless that change is necessary because of funding constraints or regulatory changes.

11.0	**Required Submission for HUD Field Office Review**. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. **Note:** Faxed copies of these documents will not be accepted by the Field Office. (a) Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations* (which includes all certifications relating to Civil Rights) (b) Form HUD-50070, *Certification for a Drug-Free Workplace* (PHAs receiving CFP grants only) (c) Form HUD-50071, *Certification of Payments to Influence Federal Transactions* (PHAs receiving CFP grants only) (d) Form SF-LLL, *Disclosure of Lobbying Activities* (PHAs receiving CFP grants only) (e) Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet* (PHAs receiving CFP grants only) (f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations. (g) Challenged Elements (h) Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report* (PHAs receiving CFP grants only) (i) Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan* (PHAs receiving CFP grants only)

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced 5-Year and Annual PHA Plans. The 5-Year and Annual PHA plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission and strategies for serving the needs of low-income and very low-income families. This form is to be used by all PHA types for submission of the 5-Year and Annual Plans to HUD. Public reporting burden for this information collection is estimated to average 12.68 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. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality

Instructions form HUD-50075

Applicability. This form is to be used by all Public Housing Agencies (PHAs) with Fiscal Year beginning April 1, 2008 for the submission of their 5-Year and Annual Plan in accordance with 24 CFR Part 903. The previous version may be used only through April 30, 2008.

1.0 PHA Information
Include the full PHA name, PHA code, PHA type, and PHA Fiscal Year Beginning (MM/YYYY).

2.0 Inventory
Under each program, enter the number of Annual Contributions Contract (ACC) Public Housing (PH) and Section 8 units (HCV).

3.0 Submission Type
Indicate whether this submission is for an Annual and Five Year Plan, Annual Plan only, or 5-Year Plan only.

4.0 PHA Consortia
Check box if submitting a Joint PHA Plan and complete the table.

5.0 Five-Year Plan
Identify the PHA's Mission, Goals and/or Objectives (24 CFR 903.6). Complete only at 5-Year update.

5.1 Mission. A statement of the mission of the public housing agency for serving the needs of low-income, very low-income, and extremely low-income families in the jurisdiction of the PHA during the years covered under the plan.

5.2 Goals and Objectives. Identify quantifiable goals and objectives that will enable the PHA to serve the needs of low income, very low-income, and extremely low-income families.

6.0 PHA Plan Update. In addition to the items captured in the Plan template, PHAs must have the elements listed below readily available to the public. Additionally, a PHA must:

(a) Identify specifically which plan elements have been revised since the PHA's prior plan submission.

(b) Identify where the 5-Year and Annual Plan may be obtained by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central off ice of the PHA. PHAs are strongly encouraged to post complete PHA Plans on its official website. PHAs are also encouraged to provide each resident council a copy of its 5-Year and Annual Plan.

PHA Plan Elements. (24 CFR 903.7)

1. **Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures.** Describe the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV and unit assignment policies for public housing; and procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists.

2. **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA Operating, Capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources.

3. **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units.

4. **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA.

5. **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants.

6. **Designated Housing for Elderly and Disabled Families.** With respect to public housing projects owned, assisted, or operated by the PHA, describe any projects (or portions thereof), in the upcoming fiscal year, that the PHA has designated or will apply for designation for occupancy by elderly and disabled families. The description shall include the following information: **1**) development name and number; **2**) designation type; **3**) application status; **4**) date the designation was approved, submitted, or planned for submission, and; **5**) the number of units affected.

7. **Community Service and Self-Sufficiency.** A description of: **(1)** Any programs relating to services and amenities provided or offered to assisted families; **(2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS; **(3)** How the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. **(Note: applies to only public housing).**

8. **Safety and Crime Prevention.** For public housing only, describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must include: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities.

9. **Pets.** A statement describing the PHAs policies and requirements pertaining to the ownership of pets in public housing.

10. **Civil Rights Certification.** A PHA will be considered in compliance with the Civil Rights and AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction.

11. **Fiscal Year Audit.** The results of the most recent fiscal year audit for the PHA.

12. **Asset Management.** A statement of how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory.

13. **Violence Against Women Act (VAWA).** A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families.

7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers

(a) **Hope VI or Mixed Finance Modernization or Development.** **1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Mixed Finance Modernization or Development; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI, Mixed Finance Modernization or Development, is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm

(b) **Demolition and/or Disposition.** With respect to public housing projects owned by the PHA and subject to ACCs under the Act: **(1)** A description of any housing (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and **(2)** A timetable for the demolition or disposition. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm
Note: This statement must be submitted to the extent **that approved and/or pending** demolition and/or disposition has changed.

(c) **Conversion of Public Housing.** With respect to public housing owned by a PHA: **1)** A description of any building or buildings (including project number and unit count) that the PHA is required to convert to tenant-based assistance or that the public housing agency plans to voluntarily convert; **2)** An analysis of the projects or buildings required to be converted; and **3)** A statement of the amount of assistance received under this chapter to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/conversion.cfm

(d) **Homeownership.** A description of any homeownership (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval.

(e) **Project-based Vouchers.** If the PHA wishes to use the project-based voucher program, a statement of the projected number of project-based units and general locations and how project basing would be consistent with its PHA Plan.

8.0 Capital Improvements. This section provides information on a PHA's Capital Fund Program. With respect to public housing projects owned, assisted, or operated by the public housing agency, a plan describing the capital improvements necessary to ensure long-term physical and social viability of the projects must be completed along with the required forms. Items identified in 8.1 through 8.3, must be signed where directed and transmitted electronically along with the PHA's Annual Plan submission.

8.1 Capital Fund Program Annual Statement/Performance and Evaluation Report. PHAs must complete the *Capital Fund Program Annual Statement/Performance and Evaluation Report* (form HUD-50075.1), for each Capital Fund Program (CFP) to be undertaken with the current year's CFP funds or with CFFP proceeds. Additionally, the form shall be used for the following purposes:

(a) To submit the initial budget for a new grant or CFFP;

(b) To report on the Performance and Evaluation Report progress on any open grants previously funded or CFFP; and

(c) To record a budget revision on a previously approved open grant or CFFP, e.g., additions or deletions of work items, modification of budgeted amounts that have been undertaken since the submission of the last Annual Plan. The Capital Fund Program Annual Statement/Performance and Evaluation Report must be submitted annually.

Additionally, PHAs shall complete the Performance and Evaluation Report section (see footnote 2) of the *Capital Fund Program Annual Statement/Performance and Evaluation* (form HUD-50075.1), at the following times:

1. At the end of the program year; until the program is completed or all funds are expended;

2. When revisions to the Annual Statement are made, which do not require prior HUD approval, (e.g., expenditures for emergency work, revisions resulting from the PHAs application of fungibility); and

3. Upon completion or termination of the activities funded in a specific capital fund program year.

8.2 Capital Fund Program Five-Year Action Plan

PHAs must submit the *Capital Fund Program Five-Year Action Plan* (form HUD-50075.2) for the entire PHA portfolio for the first year of participation in the CFP and annual update thereafter to eliminate the previous year and to add a new fifth year (rolling basis) so that the form always covers the present five-year period beginning with the current year.

8.3 Capital Fund Financing Program (CFFP). Separate, written HUD approval is required if the PHA proposes to pledge any

portion of its CFP/RHF funds to repay debt incurred to finance capital improvements. The PHA must identify in its Annual and 5-year capital plans the amount of the annual payments required to service the debt. The PHA must also submit an annual statement detailing the use of the CFFP proceeds. See guidance on HUD's website at: http://www.hud.gov/offices/pih/programs/ph/capfund/cffp.cfm

9.0 Housing Needs. Provide a statement of the housing needs of families residing in the jurisdiction served by the PHA and the means by which the PHA intends, to the maximum extent practicable, to address those needs. **(Note:** Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).

9.1 Strategy for Addressing Housing Needs. Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. **(Note:** Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).

10.0 Additional Information. Describe the following, as well as any additional information requested by HUD:

(a) Progress in Meeting Mission and Goals. PHAs must include (i) a statement of the PHAs progress in meeting the mission and goals described in the 5-Year Plan; (ii) the basic criteria the PHA will use for determining a significant amendment from its 5-year Plan; and a significant amendment or modification to its 5-Year Plan and Annual Plan. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**

(b) Significant Amendment and Substantial Deviation/Modification. PHA must provide the definition of "significant amendment" and "substantial deviation/modification". **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan.)**

(c) PHAs must include or reference any applicable memorandum of agreement with HUD or any plan to improve performance. **(Note: Standard and Troubled PHAs complete annually).**

11.0 Required Submission for HUD Field Office Review. In order to be a complete package, PHAs must submit items (a) through (g), with signature by mail or electronically with scanned signatures. Items (h) and (i) shall be submitted electronically as an attachment to the PHA Plan.

(a) Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*

(b) Form HUD-50070, *Certification for a Drug-Free Workplace* **(PHAs receiving CFP grants only)**

(c) Form HUD-50071, *Certification of Payments to Influence Federal Transactions* **(PHAs receiving CFP grants only)**

(d) Form SF-LLL, *Disclosure of Lobbying Activities* **(PHAs receiving CFP grants only)**

(e) Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet* **(PHAs receiving CFP grants only)**

(f) Resident Advisory Board (RAB) comments.

(g) Challenged Elements. Include any element(s) of the PHA Plan that is challenged.

(h) Form HUD-50075.1, ***Capital Fund Program Annual Statement/Performance and Evaluation Report*** **(Must be attached electronically for PHAs receiving CFP grants only).** See instructions in 8.1.

(i) Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan* **(Must be attached electronically for PHAs receiving CFP grants only).** See instructions in 8.2.

ATTACHMENT 6

SECTION 8 HOUSING CHOICE VOUCHER PROGRAM FAMILY SELF-SUFFICIENCY PROGRAM ACTION PLAN

City of Oceanside
Community Development Commission
Neighborhood Services Department
Housing Division

CITY OF OCEANSIDE

www.ci.oceanside.ca.us

300 N. Coast Highway
Oceanside, CA 92054

Business Telephone: (760) 435-3360

FAX: (760) 754-8918

Reasonable accommodations for persons with disabilities may be requested.

Revised February 2013

INTRODUCTION AND BACKGROUND 1
PURPOSE OF FAMILY SELF-SUFFICIENCY PROGRAM 1
FAMILY DEMOGRAPHICS 2
NEEDS AND SERVICES 3
PROCESS OF PARTICIPATION 4
WAITING LIST 4
OUTREACH EFFORTS 5
ACTIVITIES AND SUPPORTIVE SERVICES 5
CONTRACT OF PARTICIPATION 6
ESCROW ACCOUNT 8
TERMINATION OF THE CONTRACT 9

FAMILY SELF-SUFFICIENCY PROGRAM
ACTION PLAN

INTRODUCTION

The City of Oceanside Community Development Commission, hereinafter referred to as the PHA, implemented the Family Self-Sufficiency Program (FSS) in 1995 with 50 slots. Since that time the FSS program increased in size to 100 slots. The FSS program is a voluntary program designed to promote economic self-sufficiency and is offered to all individuals under lease with the PHA. The program combines housing assistance with education, job training and supportive services to help residents find full-time employment. The FSS program is designed to assist families in becoming economically independent through the cooperative efforts of rental assistance and supportive services. The PHA has created and implemented the FSS program to meet this goal.

The PHA will select FSS participants from the established waiting list in accordance with section 8 Federal preferences and Local priorities as outlined in the HUD approved Administrative Plan.

BACKGROUND

The Cranston-Gonzales National Affordable Housing Act of 1990, Section 554, enacted the Family Self-Sufficiency (FSS) Program, which is implemented by the Department of Housing and Urban Development (HUD). This Act set a new direction for Public Housing Authorities (PHAs) across the country.

The Quality Housing and Work Responsibility Act (QHWRA) of 1998 made several changes related to admission and occupancy requirements of Section 8 assisted housing. Section 509 of the QHWRA amended Section 23 of the 1937 Affordable Housing Act to make several changes related to the FSS Program, which became effective October 21, 1998. Section 509 provided that the mandatory minimum FSS Program size will not increase when a PHA receives incremental Section 8 funding and allowed PHAs to reduce their mandatory minimum FSS Program size obligation as families successfully complete their FSS Contracts of Participation (CoP). As of June 30, 2012, the PHA had a mandatory minimum program size of 7 vouchers.

The PHA will maintain a Family Self-Sufficiency Program of at least one hundred (100) families who volunteer to strive for economic independence from governmental financial subsidies within a five year contractual period. The PHA can extend the term of the contract up to 2 years if the family gives the PHA a written request for an extension and the PHA finds that good cause exists for the extension, the FSS Program will be available to families currently assisted under the Section 8 HCV Program. The FSS Program coordinates existing public and private sector resources and integrates them into individualized personal development plans for participants who need comprehensive and coordinated assistance in becoming economically independent.

PURPOSE OF FAMILY SELF-SUFFICIENCY PROGRAM

The purpose of the FSS Program is to promote the development of local strategies to coordinate the use of assistance under the Housing Choice Voucher Program (HCV) with public and private resources to enable participating families to increase earned income, reduce or eliminate the need for welfare assistance, and make progress toward economic independence and self-sufficiency. The FSS program and this FSS Action Plan support HUD's strategic goal of helping HUD-assisted renters make progress toward self-sufficiency. The FSS program provides critical tools that can be used to support welfare reform and help families in our

community to develop new skills that will lead to economic self-sufficiency. As a result of their participation in our FSS program, many families have the opportunity to achieve stable, well-paid employment. Specific objectives include:

- Developing local strategies that coordinate local resources to deliver effective services that support low-income families in achieving economic independence.
- Stabilizing housing assistance and providing escrow accounts for participating families to allow them to make the transition to private and unsubsidized market housing.
- Providing escrow accounts for participating families to allow them to make the transition to private market housing, and
- Documenting and sharing experiences that are associated with implementing and operating the Family Self-Sufficiency program as a way to better serve participating families.

FAMILY DEMOGRAPHICS:

As of October 16, 2012, approximately 1631 families participate in the City of Oceanside Section 8 Housing Choice Voucher program.

Of this total, 89 families currently participate in the FSS program. Ninety-one percent of these are female-headed households.

Federal regulations require that this action plan include demographics of the families expected to participate in the FSS program. The following demographics include the 89 families who are currently on the FSS program, as well as all families that participate in the City of Oceanside HCV program, who may currently or in the future be able to participate in the FSS program. The determination of which families to include as expected to participate was made through an analysis of every family on our HCV program. We have included as expected to participate all families in which the head of household is elderly or disabled, as well as families with disabled members who also have adult members who work, have current employment history, and/or are pursuing higher education. Although every HCV participant in the City of Oceanside is offered participation in the FSS program, then following is a description of the characteristics of families who can reasonably be expected to participate in the FSS program.

Of the 1631 families participating in the City of Oceanside HCV Program, approximately 11 families can reasonably be counted as potential FSS participants, with an additional 89 families currently participating in FSS. This totals approximately 100 families that can be expected to participate in FSS.

<u>Race:</u>

Of the 89 families that are currently participating in FSS, they have identified themselves or their children in the following racial categories:

White: 50 individuals
American Indian/Alaska Native: 2 individuals
Black/African American: 31 individuals
Asian: 2 individuals
Native Hawaiian/Other Pacific Islander: 4 individuals

Ethnicity:

Twenty-eight individuals identified themselves or their children as Hispanic.
Sixty-one individuals identified themselves or their children as non-Hispanic.

Age:

This category relies not on self-certification but on birth certificates. The following is a breakdown by age of the members of the 89 families currently participating in FSS.

Age zero to ten years: 76 individuals
Age eleven to twenty years: 138 individuals
Age twenty-one to thirty years: 25 individuals
Age thirty-one to forty years: 31individuals
Age forty-one to fifty years: 30 individuals
Age fifty-one to sixty years: 17 individuals
Age sixty-one to seventy years: 1 individual

Disability:

Of the families expected to participate in FSS, 12 have a disabled head-of-household, and have other disabled family members. Disabled status is confirmed by disability status and payments awarded by the Social Security Administration, or by annual certification of disability by a medical provider.

Supportive Service Needs:

The families expected to participate in FSS have a variety of supportive service needs; the following are needs commonly expressed by current and former FSS families:

- Homeownership counseling
- Credit repair/counseling
- Post-secondary education or vocational training
- Child care
- Mental Health or substance abuse counseling
- Household skills training

In addition, some of the potential FSS families who identify themselves as Hispanic may require classes in English in order to reach their full earning and self-sufficiency potential.

NEEDS AND SERVICES

In order to address the problems and needs of FSS Program participants, a number of community resources aimed at the goal of self-sufficiency will be made available. The services offered to the participants will be provided within the parameters and guidelines of all participating agencies. The program will consist of some of the following components, as well as other components yet to be determined by the self-sufficiency participants:

* Education:

* Job Counseling:

* Job Placement:

* Housing Assistance: The PHA will counsel each participant with regard to housing opportunities and give assistance with individual housing needs. Counseling will include development of a strategy for housing independence.

Additional needs to be addressed as the family's progress through the FSS program will be determined by FSS participants.

PROCESS OF PARTICIPATION

Selection Procedures

To be eligible for the FSS Program, potential applicants must be current HCV Program participants, reside within the PHA's jurisdiction and have full-time employment goals. Selection of the participating families will be made from current HCV Program participants without regard to race, religion, color, sex, handicap, age, family status or national origin.

Screening Process

1. When a HCV participant expresses interest in applying to the FSS program, a letter along with an FSS Intake Form is sent. The FSS applicant shall have two weeks to respond to the letter and schedule an appointment (form requests more specific information regarding goals, barriers, education, work experience, and times and days applicant is available for appointment). If the FSS applicant fails to complete and return the form within the allotted time, the application to FSS is withdrawn and the HCV participant must re-apply if interested.
2. At the scheduled appointment, the FSS Coordinator will give an in-depth explanation of the FSS Program, including intake form, and the responsibilities of both the Head of Household and the PHA.
3. At the conclusion of the interview, the FSS Coordinator may assign tasks that consist of attendance at one informational meeting, and follow-up on appropriate referrals for child care, transportation, job training programs and other job related needs. Screening will consist only of referrals that measure the family's interest and willingness to participate in the FSS program and which may be readily achievable by the family, based on the family members' educational level, and disabilities, if any.

Waiting List

Depending on available space in the FSS program, applicants may be placed on a waiting list, and selected in the order that they expressed an interest in the FSS Program. Port-ins with an active FSS CoP will have a preference.

Portability

FSS families in good standing with the initial Housing Authority will be allowed to participate in the City of Oceanside's FSS program. The City of Oceanside will make every attempt to absorb the family as soon as possible. Upon absorption, the FSS Coordinator will contact the exporting FSS Coordinator and provide a copy of the newly executed CoP/ITSP of the incoming family and contact information where the escrow funds held on behalf of that family should be transferred.

Non-FSS families in good standing with the initial Housing Authority who wish to participate in the City of Oceanside's FSS program will be enrolled. The City of Oceanside will make every attempt to absorb the family as soon as possible.

Outgoing FSS families, who fail to execute a CoP with the receiving PHA's FSS program within 6 months of availability, will forfeit the escrow funds.

Repeat Participants

Any Family who has previously participated in the FSS program and completed the CoP with release of Escrow will be ineligible to participate in the FSS program again.

Individuals, who have successfully completed the FSS CoP and received escrow funds of $5,000 or less, may be allowed to enroll in FSS a second time at the discretion of the PHA.

Any family who voluntarily terminates their CoP for good cause will be allowed a second opportunity to participate in the FSS program. However, the Family must make new application to the Program and their enrollment will not be "fast-tracked."

Any Family that was terminated from the FSS program for cause may be allowed a second opportunity to participate in the FSS program at the PHA's discretion. These families will be asked to submit a written statement explaining changes in circumstances that will allow them to succeed if given a second chance.

Incentives

HCV Program participants are offered a myriad of incentives for FSS participation. In addition to the HUD mandated Escrow Account Program, the FSS Program offers:

- One-on-one career/education counseling sessions with PHA staff or other resources where available
- Referrals to life and job skills workshops
- Homeownership education referrals
- Budget and credit counseling and referrals
- Preference for HCV homeownership when available

Outreach Efforts

Outreach for the FSS program and recruitment of FSS participants is conducted at each HCV participant's annual reexamination, as well as through FSS orientation meetings. Every HCV family is notified of and invited to these meetings by mail. These outreach efforts to every HCV family ensure that each family is informed about the FSS program, regardless of age, disability or minority status.

Activities and Supportive Services

In order to address the problems and needs of FSS Program participants, a number of community resources aimed at the goal of self-sufficiency will be made available. The services offered to the participants will be provided within the parameters and guidelines of all participating agencies. The program will consist of some of the following components, as well as other components yet to be determined by the self-sufficiency participants:

- Child Care
- Job Counseling
- Basic remedial education
- Job skills training
- Case management

- Money management counseling referrals
- Homeownership education

Additional needs to be addressed as the family's progress through the FSS program will be determined by family self-sufficiency participants. All families may receive supportive services based on the resources available to the FSS Program.

Contract of Participation

Each family that is selected to participate in an FSS program must enter into a contract of participation with the PHA. The Contract of Participation (CoP) shall be signed by the head of the FSS family.

The CoP and Individual Training and Services Plan, (ITSP) shall be in the form prescribed by HUD, and shall set forth the principal terms and conditions governing participation in the FSS program, including the rights and responsibilities of the FSS family and of the PHA, the services to be provided to, and the activities to be completed by, the head of the FSS family and each adult member of the family who elects to participate in the program.

Individual Training and Services Plan

The ITSP shall establish specific interim and final goals by which the PHA, and the family, may measure the family's progress towards fulfilling its obligations under the contract of participation, and becoming self-sufficient. For each participating FSS family that is a recipient of welfare assistance, the PHA must establish an interim goal that the family becomes independent from welfare assistance and remain independent from welfare assistance at least twelve consecutive months before the expiration of the term of the contract of participation, including any extension thereof.

Compliance with lease terms

The CoP shall provide that one of the obligations of the FSS family is to comply with the terms and conditions of the Housing Choice Voucher assisted lease. This includes non-payment and late payments of the tenant share of rent.

Employment Obligation

The head of the FSS family shall be required under the CoP to seek and maintain suitable employment during the term of the contract and any extension thereof. Although other members of the FSS family may seek and maintain employment during the term of the contract, only the head of the FSS family is required to seek and maintain suitable employment in order for the family to be eligible for completion of the FSS CoP. The HA has determined that suitable employment is defined as at least 32 hours per week. These hours can be achieved through more than one source of employment.

The PHA's FSS program will make reasonable accommodations for persons with disabilities upon request and verification of need by a qualified third party. Such reasonable accommodations may include a reduction in what is considered full-time employment or schooling, referrals for assistive technology, and worksite evaluation and other adjustments necessary to make the FSS Program equally accessible. However, accommodations that require change of the basic purpose and intent of the FSS program will not be considered reasonable. The FSS Contract continues to include a requirement that the Head of the FSS family seek and maintain suitable employment throughout the term of the FSS contract, after

appropriate job training. The head of the FSS family is the family member who is the head of household for purposes of determining income eligibility and rent.

Seek Employment

The obligation to seek employment means that the head of the FSS family has documented proof they applied for employment, attended job interviews, and has otherwise followed through on employment opportunities.

- Full-time employment is equal to 32 hours or more a week at the California minimum wage
- Full-time schooling is as identified by the accredited educational institution
- Full-time self-employment is defined as earnings equal to or more than full-time employment at the California minimum wage
- Part-time employment is equal or more than 15 hours per week but not more than 31 hours per week at the California minimum wage
- Employment that is less than 15 hours per week at California minimum wages is not considered in line with the basic purpose and intent of the Family Self-Sufficiency program

A determination of suitable employment shall be made by the PHA based on the skills, education, and job training of the individual that has been designated the head of the FSS family, and based on the available job opportunities within the jurisdiction served by the PHA.

Extensions

The PHA shall, in writing, extend the term of the CoP for a period not to exceed two years for any FSS family that requests, in writing an extension of the contract, provided that the PHA finds that good cause exists for granting the extension. Extensions will be granted in increments of three months at a time and extended based on documented progress within the prior three month extension period. Contract extensions will not be given for the sole purpose of accumulating escrow funds. Extension of the contract; however, will entitle the FSS family to continue to have amounts credited to the family's FSS account.

The family's written request for an extension must include a description of the need for the extension. The family must demonstrate good cause for the extension. "Good cause" may be loss of job due to business closure, serious illness, death of a household member, or additional time needed for a family to get off of Temporary Assistance for Needy Families (TANF) assistance. The family must request an extension in writing and describe the reason that was "beyond their control" that necessitates the extension. The applicant must include in this written request a description and estimated time to complete tasks necessary to reach the final goal within 24 months. Extensions must be requested prior to the CoP end date to be considered.

Lack of Essential Services

If a social service agency fails to deliver the supportive services indicated in member's individual training and services plan, the PHA shall make a good faith effort to obtain these services from another agency.

If the PHA is unable to obtain the services from another agency, the PHA shall reassess the family member's needs, and determine whether other available services would achieve the same purpose. If other available services would not achieve the same purpose, the PHA shall

determine whether the unavailable services are integral to the FSS family's advancement or progress toward self-sufficiency.

If the unavailable services are determined not to be integral to the FSS family's advancement toward self-sufficiency, the PHA shall revise the individual training and services plan to delete these services, and modify the CoP to remove any obligation on the part of the FSS family to accept the unavailable services.

If the unavailable services are determined to be integral to the FSS family's advancement toward self-sufficiency, the PHA shall declare the contract of participation null and void.

Modification of Contract

The PHA and the FSS family must mutually agree to modify the CoP. The CoP may be modified in writing with respect to the individual training and services plans, the contract term (extensions), and designation of the head of the family. Contracts will not be modified within the 90 days of the contract's end date.

Completion of the Contract

The CoP is considered to be completed, and a family's participation in the FSS program is considered to be concluded when one of the following occurs:

1. The FSS family has fulfilled all of its obligations under the contract of participation on or before the expiration of the contract term, including any extension thereof; or

2. Thirty percent of the monthly adjusted income of the FSS family equals or exceeds the published existing housing fair market rent for the size of the unit for which the FSS family qualifies based on the PHA's occupancy standards. The CoP will be considered completed and the family's participation in the FSS program concluded on this basis even though the contract term, including any extension thereof, has not expired, and the family members who have the individual training and services plans have not completed all the activities set for in their plans.

Escrow Account

The HA will establish an escrow account for each participating FSS family. The HA will credit to this account a portion of the increase of rent paid that normally results from increases in the earned income of family members during the term of this contract. The escrow funds will be invested by the HA in an interest bearing savings account and investment income will be credited quarterly to the escrow account.

The amount accrued in the escrow account may be paid to the head of the participating family after:

1. The PHA has determined the participating family has met its obligations under the CoP, including the requirements of each ITSP.

Monies held in escrow for FSS families cannot be used to pay debts owed to the PHA during an active contract.

Interim Withdrawals

Interim withdrawals are made purely at the discretion of the PHA. The PHA may permit the head of the FSS family to withdraw funds from the FSS escrow account before completion of the CoP if:

- The family has completed specific interim goals designated by the PHA
- The requested amount does not exceed 30% of the balance accrued in the FSS escrow account
- The use of said funds is related to an existing ITSP goal and will result in achievement of that goal
- There are no other reasonable resources available in the community to address the need
- An approved financial partner or advisor recommends in writing that use of the funds will make the family "mortgage ready"
- The family has an approved contract for purchase of a home

The PHA will make all payments directly to the provider of the service.

Specific Situations:

Car repairs

The PHA will require:

- Three valid written estimates
- A work guarantee
- Reasonable expectations that the repairs will resolve the transportation issue
- Proof of insurance and registration on the repaired vehicle

Car Purchase

- The car must pass an inspection by a licensed mechanic
- Proof of insurance and registration on the vehicle
- Verification of Bluebook value
- Reasonable expectations that the purchase will resolve the transportation issue

Debt Pay-off

- Copy of credit report verifying the indebtedness
- Names, addresses, account numbers and amounts of debt to be paid
- Written verification that debt requirement has been satisfied

Termination of the Contract

The CoP is automatically terminated if the family's Section 8 assistance is terminated. The CoP may be terminated before the expiration date of the contract term, and any extension thereof, by:

1. Mutual Consent of the parties;
2. The failure of the FSS family to meet its obligations under the CoP without good cause, including failure to comply with the contract when the family has moved outside the jurisdiction of the PHA

Consequences of Noncompliance with Contract

1. Terminate the family's participation in the FSS Program

The CoP may be terminated before the expiration date of the contract term, and any extension thereof, by:

1. Mutual consent of the parties
2. Failure of family to meet contract obligations without good cause
3. Family withdrawal from FSS program
4. Other act deemed inconsistent with the purpose of the FSS program
5. Operation of law

Possible good cause for compliance exceptions under the contract may include any of the following:

- An assignment, or job referral which is not included in the contract
- Temporary illness or incapacitation
- Requirements to appear in court
- Family crisis, such as the illness or death of a family member

Terminations for Cause

The following are considered reasons to terminate a client from the FSS program:

1. Any client who fails to show for 2 scheduled appointments/workshops consecutively
2. Failure to Meet and Complete Goals - Any client who consistently fails to complete any goals listed within individual ITSP
3. Termination of participation in the FSS Program may occur for any client for reasons outlined and listed within the CoP
4. Housing Choice Voucher Program Termination - Any client who has their HCV Program participation terminated shall be immediately terminated from the FSS Program and any escrow monies will be forfeited
5. Any related new HUD Mandate resulting in changes to CoP and/or CFR
6. Moving from the jurisdiction and not continuing in the FSS program
7. Termination of the contract will result in the forfeiture of any accrued monies in the escrow account.
8. Termination of benefits under the Housing Choice Voucher program will be handled in accordance with the procedures outlined in the Administrative Plan of the Housing Authority.

Terminated Contracts

After an FSS contract has been terminated for non-compliance with FSS requirements, the family MAY be allowed to participate after waiting 24 months, if they can demonstrate to the FSS Coordinator that they are NOW motivated to work towards goals that include employment and freedom from welfare. If the FSS participant and the PHA mutually agree to terminate the Contract of Participation, the HCV participant will be required to wait 12 months before applying to the FSS Program, unless, in unusual circumstances, the Family Self-Sufficiency Coordinator, with approval from the HCV Program Supervisor, has made special arrangements with the family to begin their new FSS contract when they are able to set full-time employment goals or when the family can show good cause for reducing the waiting time.

General Rules For Hearings

1. If the PHA staff determines the need to terminate or withhold the FSS participant's supportive services under the CoP for failing to comply with the terms of the contract, the participant will be afforded an opportunity for an informal hearing before termination of housing assistance payments and other program benefits.
2. All notices of termination will be in writing. The reason for termination will be specifically explained in the notice.
3. All requests for a hearing must be made in writing.
4. The PHA will make a good-faith effort to informally resolve the complaint prior to a scheduled hearing. The participant shall have the right to withdraw, in writing, the request for a hearing at any time prior to the hearing.