

<b>Annual PHA Plan</b> <i>(Standard PHAs and Troubled PHAs)</i>	<b>U.S. Department of Housing and Urban Development</b> <b>Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226</b> <b>Expires: 03/31/2024</b>
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

**Applicability.** The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

**Definitions.**

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																						
A.1	<p> <b>PHA Name:</b> <u>Housing Authority of St. Louis County</u>      <b>PHA Code:</b> <u>MO-004</u>  <b>PHA Type:</b>    <input checked="" type="checkbox"/> Standard PHA    <input type="checkbox"/> Troubled PHA  <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>01/2023</u>  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  <b>Number of Public Housing (PH) Units</b> <u>510</u>    <b>Number of Housing Choice Vouchers (HCVs)</b> <u>6,981</u>    <b>Total Combined Units/Vouchers</b> <u>7,491</u>  <b>PHA Plan Submission Type:</b>    <input checked="" type="checkbox"/> Annual Submission                      <input type="checkbox"/> Revised Annual Submission </p> <p> <b>Availability of Information.</b> PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> <b>The Draft 2023 PHA Annual Plan and 5-year Action plan is available for viewing at the following locations:</b> </p> <table style="width: 100%; border: none;"> <tr> <td style="border: none; width: 33%;"> PHA Main Administrative Office  8865 Natural Bridge Road  St. Louis, MO 63121 </td> <td style="border: none; width: 33%;"> PHA Site Management Office Arbor Hill  133 Grape Avenue  Maryland Heights, MO 63043 </td> <td style="border: none; width: 33%;"> PHA Site Management Office Highview  2876 West Pasture  St. Louis, MO 63114 </td> </tr> <tr> <td style="border: none;"> PHA Site Management Office Wellston  6203 Cote Brilliant Avenue  Wellston MO, 63133 </td> <td colspan="2" style="border: none;"> Housing Authority St. Louis County  Website at haslc.com </td> </tr> </table> <p> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2" style="width: 10%; text-align: center;"><input type="checkbox"/></th> <th rowspan="2" style="width: 20%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 20%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td></td> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	PHA Main Administrative Office 8865 Natural Bridge Road St. Louis, MO 63121	PHA Site Management Office Arbor Hill 133 Grape Avenue Maryland Heights, MO 63043	PHA Site Management Office Highview 2876 West Pasture St. Louis, MO 63114	PHA Site Management Office Wellston 6203 Cote Brilliant Avenue Wellston MO, 63133	Housing Authority St. Louis County Website at haslc.com		<input type="checkbox"/>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV		Lead PHA:					
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	Lead PHA:																						

**B. Plan Elements**

**B.1**

**Revision of Existing PHA Plan Elements.**

(a) Have the following PHA Plan elements been revised by the PHA?

- |                                     |                                     |  |
|-------------------------------------|-------------------------------------|--|
| Y                                   | N                                   |  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Statement of Housing Needs and Strategy for Addressing Housing Needs.                  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Financial Resources.   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Rent Determination.  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Operation and Management.  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Grievance Procedures.  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Homeownership Programs.  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Community Service and Self-Sufficiency Programs.                                       |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Safety and Crime Prevention (VAWA).  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Pet Policy.  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Asset Management.  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Substantial Deviation.   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Significant Amendment/Modification.  |

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

**STATEMENT OF HOUSING NEEDS AND STRATEGY FOR ADDRESSING HOUSING NEEDS**

Where an individual lives affects nearly every aspect of life, from the quality of education they receive to their physical health and wellbeing. Simply being housed is not enough to determine future success, where in St. Louis County one lives also matters. Access to jobs, transit, quality schools, and healthcare all shape a person’s future.

The mission of the Housing Authority of St. Louis County (Authority) is to provide housing options and support at multiple stages of an individual’s housing journey. This begins with placing a client in decent, safe, and affordable housing and ensuring their right to equal housing opportunities but extends to specialized programming and partnerships to promote self-sufficiency. Ultimately the goal of the Authority is to improve the quality of life for low- and moderate-income families and individuals.

Families in search of affordable housing in St. Louis County face considerable challenges. These challenges are more acute for extremely low-income families, elderly and disabled individuals, and households of various races and ethnicities. The Department of Housing and Urban Development (HUD) has identified four major housing problems affecting low- and moderate-income households:

- substandard housing (i.e., housing lacking complete plumbing or kitchen facilities),
- overcrowding (i.e., more than one person per room),
- cost burden (i.e., spending more than 30% of income on housing costs), and
- severe cost burden (i.e., spending greater than 50% of income on housing costs).

Below are the specific needs of families with incomes below 30% of the Area Median Income (AMI), elderly families, households with individuals with disabilities, and households of various races and ethnic groups.

Housing Needs for Extremely Low-income Families (30% AMI)

Across Missouri and St. Louis County, there is a shortage of affordable rental homes available to families whose household incomes are at or below the poverty guideline or 30% of the area median income. This group is considered extremely low income. Many of these households are severely cost-burdened, spending more than half of their income on housing. According to Comprehensive Housing Affordability Strategy (CHAS) data from 2017, there are 25,865 renter households and 41,395 total households in St. Louis County with a household income below 30% AMI. Severely cost burdened households are more likely than other renters to sacrifice health care and food costs in order to pay rent. According to the National Low Income Housing Coalition, these households are also much more likely to experience unstable housing situations like evictions and homelessness.

Extremely low-income households face a severe shortage of housing supply, with the greatest need being for one-, two-, and three-bedroom affordable units. According to the Affordable STL’s *Affordable Housing Report Card* which assesses affordable housing needs in St. Louis City and county, renters with budgets of \$2,000 per month for rent have the choice of ten times as many units than renters with rental budgets of \$550. Currently, there are approximately 442,243 housing units for 998,684 people in the county, according to St. Louis County’s *Affordable Housing and Homeless Services Investment Strategic Plan*. Low-income families are forced to compete for these available units with those who have the income to afford more expensive places to live. Only about one in four households in the lowest income bracket have access to income-restricted subsidized housing.

In terms of housing quality, maintenance and accessibility are often an issue for extremely low-income families. According to the St. Louis HOME Consortium’s *Analysis of Impediments to Fair Housing Choice*, lack of availability to accessible housing is one of the eight main impediments to housing choice in the St. Louis area. While older homes are less expensive to purchase, the cost of maintaining them can create a significant financial challenge. According to St. Louis County’s *Consolidated Plan* data (which includes data for St. Louis County), 745 households are faced with substandard housing, lacking complete plumbing or kitchen facilities. Overcrowding and severe overcrowding (homes with greater than 1.01-1.5 people per room and homes with greater than 1.51 people per room, respectively), affects 944 extremely low-income rental households.

Affordable housing in the county tends to be concentrated in areas of low opportunity that lack the resources of wealthier subareas of the county. These conditions make it more likely that families in poverty remain in poverty. According to 2019 ACS data, poverty is higher in North St. Louis County when compared to the rest of the county. Vacancy rates, foreclosures, and evictions are all higher in North County than the rest of the county, while home values are lower. The *Affordable Housing Report Card* states that 42% of Housing Choice vouchers are used in five municipalities in North St. Louis County: Florissant, Ferguson, Spanish Lake, Jennings, and Bellefontaine Neighbors, while the largest and wealthiest municipalities in the county (Wildwood, Clayton, Town and Country, Ladue and Brentwood) have no voucher households at all. New construction exacerbates this place-based problem, as more new development primarily occurs in the central, west, and south subareas of the county. Multifamily housing, however, is concentrated in the Northern regions of the county.

#### Elderly Families

The elderly population in St. Louis County is increasing and will continue increasing as baby boomers age. According to 2021 ACS data, about 19% of St. Louis County's total population is 65 years old or older. Of all adults over the age of 65 in the county, about 7% live below the federal poverty level and according to *Affordable Housing and Homeless Services Investment Strategic Plan*, seniors living in North St. Louis County are among the most likely to be cost burdened.

Issues of quality and accessibility disproportionately affect elderly households, as household income typically decreases post-working years and retrofits are often needed to allow for adults to age in place. Harvard University's Joint Center for Housing Studies' *State of the Nation's Housing Report* states that most U.S. homes across the county lack basic accessibility features, such as no-step entryways and grab-bars in bathrooms would allow older adults to remain in their homes as they age.

The housing stock in the county is aging as well, making it more likely that homeowners, elderly or not, will need to make improvements to their home to maintain livability. The majority of St. Louis County's single-family housing stock was built prior to 1970 and most were built in the 1950s and 1960s. The oldest homes are clustered in North St. Louis County bordering St. Louis City.

#### Households with Individuals with Disabilities

According to 2015-2019 ACS data, 12% of the county's population has a disability and 69% of that group is under age 65. The lack of accessible housing in St. Louis County and the concentration of affordable housing in low-opportunity areas with fewer resources makes it difficult for families with disabilities to find housing. Shortage in supply of affordable housing is compounded when an individual in a household is disabled and needs a home with accessibility modifications. As discussed above, many of the affordable housing units in the county are aging and are less likely to be accessible. With many protected classes having lower than average incomes, housing affordability becomes a critical aspect of fair access to housing.

Disability is cited in the *Consolidated Plan* as one of the main risk factors for individuals and families being evicted and becoming unhoused. Local zoning restrictions make it difficult for residents with disabilities to locate housing in certain St. Louis County neighborhoods or to modify housing to make it more accessible. Additionally, administrative and citing constraints for group homes for persons with disabilities create further barriers to safe, accessible housing.

#### Households of Various Races and Ethnic Groups

Race has shaped the social fabric and physical infrastructure of St. Louis County. An assessment of affordable housing in the county cannot be discussed without an examination of the role race plays. The legacy of racially motivated housing policies in the county and the nation mean that people of color are more likely to live in poverty and be disproportionately affected by the lack of affordable housing. According to 2019 ACS data, out of 87,337 total county residents living in poverty, 43,402 are Black or African American. Black or African American (23.3%) and/or Hispanic female headed households (65.3%) have the highest poverty rates in the county. Low- and extremely low-income Black or African American families are more likely to be housing cost burdened and severely housing cost burdened, and evictions and foreclosures are concentrated in majority-Black or African American areas of both St. Louis City and county.

In St. Louis County, like other places, there is a distinguishable pattern between where an individual lives and their race. Olive Boulevard is considered a dividing line between concentrations of Black or African American and white populations in the county. According to 2019 ACS data, approximately 90% of all Black or African American county residents reside north of Olive Boulevard. The disparities in largely Black or African American neighborhoods are stark. In North St. Louis County, the majority of low- and extremely low-income Black or African American renters experience housing cost burden. According to the *Affordable Housing Report Card*, in some census tracts in North St. Louis County, half of the renters are paying 30% or more of their monthly income on housing costs and the population of those census tracts is nearly entirely Black or African American.

HUD defines a group as having disproportionate need if its members experience housing needs at a rate that is 10% or greater than those of white households. While 23% of White St. Louis County households have housing problems, these problems disproportionately affect 33% of Native American and other non-Hispanic households, 35% of Hispanic households and 42% of Black or African American households.

Economic mobility, the likelihood that a family will progress up the income ladder over generations, is much less likely for Black or African American families in St. Louis County compared with the white population. Disproportionate rates of Black and White homeownership mean that Black or African American households are less likely to build wealth through homeownership. In the United States, 45% of Black or African American households are homeowners compared with 73% of White American households, according to 2019 ACS data.

For those Black or African Americans who do own homes in the county, funding upkeep is more difficult. The *Affordable Housing Report Card* found that Black or African American applicants were more than twice as likely to be denied a home improvement loan than white applicants in 2020. Changes in the housing market that allowed existing homeowners to build equity during the COVID-19 pandemic further exacerbated inequities between those who can afford to own a home and those who cannot. Concentrated poverty

and a history of disinvestment has resulted in Black or African American residents of St. Louis County being disproportionately affected by the lack of affordable, quality housing and access to wealth available to many of their white neighbors.

#### Strategy for Addressing Housing Needs

The Authority is developing internal and external strategies to address its clients' housing needs. Looking inward, the Authority adopted the following core objectives for 2022:

- Deliver services safely, effectively, and efficiently.
- Ensure residents, landlords, and employees feel respected during interactions with the Authority.
- Help our residents and families gain self-sufficiency through partnerships with other organizations in the community.
- Expand access to desirable and affordable housing.

From an external perspective, the Authority is currently identifying key areas where it can further its strategic objectives for real estate development and regional partnerships in a way that will align the Authority's strategic framework with the priorities of the St. Louis County government Affordable Housing and Homeless Services Plan to maximize regional impact. The county adopted the following strategies to serve as a framework for its affordable housing and homeless priorities through 2025:

- Build a foundation for intentional change.
- Improve housing stability.
- Expand access to housing options.
- Facilitate mobility to areas of opportunity.
- Develop the Affordable Housing Trust Fund as a new revenue source for affordable housing investments.

The Authority is currently developing complementary strategies.

#### **OPERATION AND MANAGEMENT**

*\*Please see Attachment 1: Operation and Management*

#### **COMMUNITY SERVICE AND SELF-SUFFICIENCY PROGRAMS**

The Authority will attempt to provide residents with the broadest possible options as they choose community service activities.

The Authority's goal is to design a service program that gives residents viable opportunities to become involved in the community and to gain competencies and skills. The Authority will work with resident organizations and community organizations to design, implement, assess, and recalibrate its community service program.

The Authority will make every effort to identify volunteer opportunities throughout the community, especially those in proximity to public housing developments. To the greatest extent possible, the Authority will provide names and contacts at agencies that can provide opportunities for residents, including persons with disabilities, to fulfill their community service obligations.

The Authority will provide in-house opportunities for volunteer work or self-sufficiency programs when possible.

*\*Please see Attachment 2: Family Self-Sufficiency Program Action Plan*

#### **PET POLICY**

*\*Please see Attachment 3: Pet Policy*

#### **ASSET MANAGEMENT**

Since 2018, the Authority has worked with a third-party property management company, the Sansone Group, to manage its public housing assets. On December 31, 2022, the Authority will terminate its contract with the Sansone Group and will resume responsibility of property management and maintenance for public housing assets.

#### **SUBSTANTIAL DEVIATION**

A major change in the strategic direction of the Authority pertaining to its mission and goals would constitute a "substantial deviation" from the agency's 5-year plan. Examples include undertaking new program activities, development strategies or financing initiatives that do not otherwise further the Authority's stated mission and goals, as articulated in the 5-year plan.

#### **SIGNIFICANT AMENDMENT/ MODIFICATION**

The Authority will consider the following to be significant amendments or modifications:

- Changes to rent or admissions policies or organization of the waiting list.
- Additions of non-emergency work items (items not included in the current Annual Statement or Five-Year Action Plan) or change in the use of replacement reserve funds under the Capital Fund.
- Any change regarding demolition or disposition, designation, homeownership programs or conversion activities.

An exception to this definition will be made for any of the above that are adopted to reflect changes in HUD regulatory requirements; such changes will not be considered significant amendments by HUD.

**(c) The Authority must submit its de-concentration policy for field office review.**

**DECONCENTRATION POLICY**

The Authority will use greater flexibility in attracting households with broader ranges of income. The Authority will continue to reassess ceiling rental amounts in public housing developments to attract higher-income families, as well as offer this incentive to residents residing in the developments.

The Authority will implement HUD's Earned Income Disregard, which allows qualified individuals and families to keep more of their earned income for a period of up to two years following an increase in employment income.

Other avenues to attract higher-income families being considered by the Authority are changes in waitlist admission preferences, more aggressive marketing of developments, ongoing evaluation of public housing inventory for capital improvements, and support from housing outreach coordinators through the Mobility Connections program. The Mobility Connections program offers Housing Choice Voucher (HCV) program participants individualized counseling and support to help families realize the full potential of their voucher by connecting them with property owners in high opportunity areas.

**B.2 NEW ACTIVITIES**

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?

- | Y                                   | N                                   |  |
|-------------------------------------|-------------------------------------|--|
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Hope VI or Choice Neighborhoods.   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Mixed Finance Modernization or Development.  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Demolition and/or Disposition.   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Designated Housing for Elderly and/or Disabled Families.   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Conversion of Public Housing to Tenant-Based Assistance.   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.                   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Occupancy by Over-Income Families.   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Occupancy by Police Officers.  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Non-Smoking Policies.  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Project-Based Vouchers.  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Units with Approved Vacancies for Modernization.   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). |

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

**PLANNED ACTIVITIES**

Mixed Finance Development

The Authority has received low-income housing tax credits (LIHTC) for the Arbor Hill Apartments as part of its activity for encouraging private equity investment in the development of affordable rental housing for low-income households.

Demolition/ Disposition

The Authority will submit a demolition/ disposition application for the Arbor Hill Apartments. Arbor Hill is comprised of 70 units: 15 one-bedroom units, 20 three-bedroom units and one four-bedroom unit. The Authority will build 68 new income-restricted housing units.

The disposition of the Wellston Public Housing will proceed once the repositioning and rehabilitation of the City of Wellston's public housing inventory project closes. The Authority will transfer all 201 units to the Wellston Community Empowerment Corporation, a new nonprofit established to facilitate and support the housing transition.

Conversion of Public Housing to Project-Based Assistance Under the Rental Assistance Demonstration (RAD)

The Authority will apply to convert the Arbor Hill Apartments to private ownership under HUD's RAD program, using low-income housing tax credits.

Project-Based Vouchers

Pursuant to approval of the voluntary conversion of the Wellston public housing, the Authority will allocate 186 project-based vouchers to the new development, Wellington Family Homes. The Authority also plans to attach project-based vouchers to the project.

<p><b>B.3</b></p>	<p><b>PROGRESS REPORT</b> Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p><u>Mission</u> The Housing Authority of St. Louis County provides decent, safe, and affordable housing, ensures equal housing opportunity, promotes self-sufficiency, and improves the quality of life and economic vitality for low- and moderate-income families. The Authority pursues these goals by using existing federal programs to the maximum feasible extent, by linking with other service providers, and by creating new opportunities of its own design.</p> <p><u>Objectives</u> In executing its mission, the Authority adopted four guiding objectives in 2021:</p> <ol style="list-style-type: none"> <li>1. Deliver services safely, effectively, and efficiently.</li> <li>2. Residents, landlords, and employees feel respected during their interactions with HASLC.</li> <li>3. Help residents and families gain self-sufficiency through partnerships with other organizations in the community</li> <li>4. Expand access to desirable and affordable housing.</li> </ol> <p>In 2021, the Authority created a set of core values, rehired critical staff positions that were previously eliminated, established an actionable budget, and identified key result measures.</p> <p>In 2022, the Authority developed a comprehensive training program, began the development of a real estate and external partnership plan to expand access to housing and additional supportive services, hired staff to manage real estate development and strategic initiatives, completed a job study to align job descriptions with the organization’s mission, and developed a board strategy. The Authority is currently in the process of implementing a new Customer Service and Resident Opportunity Initiative to target its core objectives.</p>
<p><b>B.4</b></p>	<p><b>CAPITAL IMPROVEMENTS.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>See 2020-2024 Capital Fund 5 Year Action Plan in EPIC approved by HUD on 12/21/2020.</p>
<p><b>B.5</b></p>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y   N  <input checked="" type="checkbox"/>   <input type="checkbox"/></p> <p>(c) If yes, please describe:</p> <p>Audit findings FY2020 Public and Indian Housing - CFDA No. 14.850</p> <p>Recommendation: The Authority should develop policies and processes to ensure that they are meeting compliance requirements for the special test: declaration of trusts.</p> <p>Action taken in response to finding: The Authority will collaborate with its General Counsel to update all declaration of trusts, as necessary.</p>
<p><b>C. Other Document and/or Certification Requirements.</b></p>	
<p><b>C.1</b></p>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y   N  <input type="checkbox"/>   <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
<p><b>C.2</b></p>	<p><b>Certification by State or Local Officials.</b></p> <p><u>Form HUD 50077-SL</u>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>

C.3	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>								
C.4	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p style="text-align: center;"> <input type="checkbox"/> Y    <input type="checkbox"/> N </p> <p>If yes, include Challenged Elements.</p>								
C.5	<p><b>Troubled PHA.</b></p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y    N    N/A  <input type="checkbox"/>   <input type="checkbox"/>   <input checked="" type="checkbox"/> </p> <p>(b) If yes, please describe:</p>								
D.	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p> <p>N/A</p>								
D.1	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p> <p>Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%;"><b>Fair Housing Goal:</b></td> <td style="width: 80%;"><u>Describe fair housing strategies and actions to achieve the goal</u></td> </tr> <tr> <td style="height: 150px;"></td> <td></td> </tr> <tr> <td><b>Fair Housing Goal:</b></td> <td><u>Describe fair housing strategies and actions to achieve the goal</u></td> </tr> <tr> <td style="height: 150px;"></td> <td></td> </tr> </table>	<b>Fair Housing Goal:</b>	<u>Describe fair housing strategies and actions to achieve the goal</u>			<b>Fair Housing Goal:</b>	<u>Describe fair housing strategies and actions to achieve the goal</u>		
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**Fair Housing Goal:**

*Describe fair housing strategies and actions to achieve the goal*

Empty text area for describing fair housing strategies and actions to achieve the goal.

# Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

## A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Inventory**, **Number of Public Housing Units and or Housing Choice Vouchers (HCVs)**, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

**PHA Consortia:** Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

## B. Plan Elements. All PHAs must complete this section.

### B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.” (24 CFR §903.7)

**Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA’s reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

**Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.** PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b)) Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA’s procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)). A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

**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. (24 CFR §903.7(c))

**Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

**Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance and 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. (24 CFR §903.7(e))

**Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))

**Homeownership Programs.** A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

**Community Service and Self Sufficiency Programs.** Describe how the PHA will comply with the requirements of (24 CFR §903.7(l)). Provide a description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))

**Safety and Crime Prevention (VAWA).** Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (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. (24 CFR §903.7(m)) 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. (24 CFR §903.7(m)(5))

**Pet Policy.** Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

**Asset Management.** State 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. (24 CFR §903.7(q))

**Substantial Deviation.** PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

**Significant Amendment/Modification.** PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

**B.2 New Activities.** If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

**HOPE VI or Choice Neighborhoods.** **1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6). (Notice PIH 2011-47)

**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 Mixed Finance Modernization or Development; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6/mfph#4](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4)

**Demolition and/or Disposition.** With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (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 approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: [http://www.hud.gov/offices/pih/centers/sac/demo\\_dispo/index.cfm](http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm). (24 CFR §903.7(h))

**Designated Housing for Elderly and Disabled Families.** Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. 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, **5)** the number of units affected and; **6)** expiration date of the designation of any HUD approved plan. **Note:** The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

**Conversion of Public Housing under the Voluntary or Mandatory Conversion programs.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; **2)** An analysis of the projects or buildings required to be converted; and **3)** A statement of the amount of assistance received 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>. (24 CFR §903.7(j))

**Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

**Occupancy by Over-Income Families.** A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may

incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7. \(24 CFR 960.503\)](#) (24 CFR 903.7(b))

**Occupancy by Police Officers.** The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7. \(24 CFR 960.505\)](#) (24 CFR 903.7(b))

**Non-Smoking Policies.** The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21 and Notice PIH-2017-03. \(24 CFR §903.7\(e\)\)](#)

**Project-Based Vouchers.** Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan ([24 CFR §903.7\(b\)](#)).

**Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

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

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

**B.3 Progress Report.** For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. ([24 CFR §903.7\(r\)\(1\)](#))

**B.4 Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section ([24 CFR §903.7\(g\)](#)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

**B.5 Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. ([24 CFR §903.7\(p\)](#))

#### C. Other Document and/or Certification Requirements.

**C.1 Resident Advisory Board (RAB) comments.** If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. ([24 CFR §903.13\(c\)](#), [24 CFR §903.19](#))

**C.2 Certification by State of Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. ([24 CFR §903.15](#)). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

**C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. 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. ([24 CFR §903.7\(o\)](#)).

**C.4 Challenged Elements.** If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

**C.5 Troubled PHA.** If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." ([24 CFR §903.9](#))

**D. Affirmatively Furthering Fair Housing (AFFH).**

**D.1 Affirmatively Furthering Fair Housing.** The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: “To implement goals and priorities in an AFH, strategies and actions shall be included in program participants’ ... PHA Plans (including any plans incorporated therein) .... Strategies and actions must affirmatively further fair housing ....” Use the chart provided to specify each fair housing goal from the PHA’s AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless , the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works 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. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

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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 the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 7.52 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.

## OPERATION AND MANAGEMENT: INSPECTIONS

### TYPES OF INSPECTIONS

**Move-In Inspections.** Leases require the Authority and the family to inspect the residence prior to occupancy to determine the condition of the unit and the equipment therein. The Authority will provide a copy of this initial signed inspection to the family and retain a copy in the resident's file.

Any adult family member may attend the initial inspection and sign the inspection form on behalf of the head of household.

**Move-Out Inspections.** The Authority will inspect the residence at the time the resident vacates it and will allow the residents to participate in the inspection, if they wish, unless they vacate without notice. The Authority will provide to the resident a statement of any costs incurred for maintenance and damage beyond normal wear and tear.

The difference between the condition of the unit at move-in and move-out serves as the basis for any charges against the resident's security deposit if the required work exceeds that for normal wear and tear.

When applicable, the Authority will provide the resident with a statement of charges for maintenance and damage beyond normal wear and tear, within ten business days of conducting the move-out inspection.

**Annual Inspections.** The Authority will inspect all occupied dwellings annually using HUD's Uniform Physical Condition Standards (UPCS).

**Special Inspections.** The Authority may conduct a special inspection for concerns in any of the following areas:

- housekeeping,
- unit condition,
- suspected lease violation,
- preventive maintenance,
- routine maintenance, or
- there is reasonable cause to believe an emergency exists.

## NOTICE AND SCHEDULING OF INSPECTIONS

**Non-emergency Entries.** The Authority will notify the resident in writing at least 48 hours prior to any non-emergency inspection.

The Authority will notify residents in writing at least one week prior to a regular annual inspection. This will allow the family time to prepare the unit for the inspection.

Entry for repairs requested by the family will not require prior notice. Resident-requested repairs presume permission for the Authority to enter the unit.

**Emergency Entries.** The Authority may enter the dwelling at any time without advance notice when there is reasonable cause to believe that an emergency exists. If no adult household member is present at the time of an emergency entry, Authority staff will leave a written statement with the date, time, and purpose of the entry prior to leaving the unit.

**Scheduling of Inspections.** The Authority will conduct Inspections during business hours. If a family needs to reschedule an inspection, they must notify the Authority at least 24 hours prior to the scheduled inspection. The Authority will reschedule the inspection no more than once, unless the resident has a verifiable good cause to delay the inspection. The Authority may request verification of such cause.

**Attendance at Inspections.** The Authority does not require the resident to be present for any inspection except the move-in inspection. However, the resident may choose to attend any inspection if they desire.

## INSPECTION RESULTS

**Emergency Repairs.** When the Authority deems conditions in the unit to be hazardous to residents' health or safety, it will make repairs or otherwise abate the situation within 24 hours. Circumstances potentially hazardous to health or safety include but are not limited to the following.

- Any condition that jeopardizes the security of the unit.
- Major plumbing leaks or flooding.
- A waterlogged ceiling or floor in imminent danger of falling.
- Natural, liquified petroleum gas, or fuel oil leaks.
- Any electrical condition that could result in shock or fire.
- Absence of a working heating system when outside temperature is below 60 degrees Fahrenheit.
- Utilities not in service, including no running hot water.
- Conditions that present the imminent possibility of injury.
- Obstacles that prevent safe entrance or exit from the unit.
- Absence of a functioning toilet.
- Inoperable smoke detectors.

**Non-emergency Repairs.** The Authority will correct non-life-threatening health and safety defects within ten business days of the inspection date. If the Authority is unable to make repairs within that period due to circumstances beyond its control (e.g., required parts or services are unavailable, weather conditions, etc.) the Authority will notify the family of an estimated date of completion.

The family must allow the Authority access to the residence to make repairs.

**Resident-caused Damages.** The Authority will bill the resident for damages to the unit beyond normal wear and tear, in accordance with the Authority's Admissions and Continued Occupancy Policy (ACOP), Section 8-I.F., Maintenance and Damage Charges. The Authority will consider repeated or excessive damages to the unit beyond normal wear and tear a serious or repeated violation of the lease.

## Attachment 1: Operation and Management

**Housekeeping.** Residents whose housekeeping habits pose a non-emergency health or safety risk, encourage insect or rodent infestation, or cause damage to the unit are in violation of the lease. In these instances, the Authority will provide proper notice of a lease violation.

The Authority will perform a reinspection within 30 days to confirm that the resident has complied with the requirement to abate the problem. Failure to abate the problem or allow for a reinspection is considered a violation of the lease and may result in termination of tenancy in accordance with the ACOP (Chapter 13).

The Authority will also issue notices of lease violation to residents who purposely disengage the unit's smoke detector. The Authority will provide one warning; a second incidence will result in lease termination.



FAMILY SELF-SUFFICIENCY PROGRAM  
ACTION PLAN

Revised August 2022

# Contents

I.	Purpose	1
II.	Goals	1
III.	Terminology	1
	Participating Family Demographics and Service Needs	2
	Estimate of Participating Families (Program Size/Number of FSS Positions)	2
	Eligible Families from Other Self-sufficiency Programs	2
	FSS Family Selection Procedures	3
	Incentives to Encourage Participation	4
	Outreach Efforts	4
	FSS Activities and Supportive Services	4
	Method for Identification of Family Support Needs	5
	Program Termination, Withholding of Services, and Grievance Procedures	5
	Assurances of Non-interference with the Rights of Non-participating Families	6
	Timetable for Program Implementation	6
	Certification of Coordination	6
	Circumstances in Which the Authority Will Grant an Extension of the COP	6
	Policies Regarding the Interim Disbursement of Escrow, Including Limitations on the Use of Funds	7
	Policies Regarding Eligible Uses of Forfeited Escrow Funds by Families in Good Standing	7
	Policies Regarding the Re-enrollment of Previous FSS Participants, Including Graduates and Those Exited the Program without Graduating	7
	Policies Regarding Requirements for Documentation of Goal Completion	7
	Policies Regarding Documentation, Designation, and Change of the Household's Designation of the "Head of FSS Family"	8
	Policies Regarding FSS Selection Preference for Porting Families	8
	Policies Regarding the Modification of Goals in the ITSP, Including Limits on Modifications as Participants Approach Graduation	8

- I. **Purpose.** The purpose of the U.S. Department of Housing and Urban Development (HUD) Family Self-Sufficiency (FSS) program is to promote the development of local strategies to coordinate the use of public housing assistance through HUD's Housing Choice Voucher (HCV) program with public and private resources. Eligible families will receive assistance through these programs to achieve economic independence and self-sufficiency. The Housing Authority of St. Louis County is currently operating an FSS program and will do so as long as funds are available.
  
- II. **Goals.** The overarching goal of the FSS program is to help families gain the skills, training, and education necessary to become financially independent and economically self-sufficient within a five-year period and become independent of cash welfare at graduation. Specific objectives for participating families include, but are not limited to:
  - obtaining full-time employment with benefits,
  - obtaining a high school diploma or higher education,
  - acquiring skills in parenting and family stability, and
  - acquiring skills in budgeting and home ownership.
  
- III. **Terminology.** The Housing Authority of the St. Louis County shall be referred to as the "Authority" throughout this document. The term "family" is used interchangeably with "applicant" or "participant" and can also refer to a single-person family.

- 1. Participating Family Demographics and Service Needs.** The following provides a description of the Authority’s current FSS program participants by demographics and service needs.

Participating Family Demographics by Race	
White	11
Black or African American	119
Asian	0
Native Hawaiian/Other Pacific Island	0

Participating Family Demographics by Ethnicity	
Hispanic	0
Non-Hispanic	130

Participating Family Demographics by Age, Gender, and Income				
Age Group	Gender		Average Income	
	Male	Female	Male	Female
17 - 20	0	5	\$0	\$4,326
21 - 25	2	27	\$16,846	\$7,158
26 - 35	0	39	\$0	\$11,818
36 - 45	0	40	\$0	\$17,974
46 - 60	2	14	\$10,098	\$16,158
61 - 99	0	1	\$0	\$8,112

Supportive Services. The Authority’s FSS program will provide participating families with a variety of supportive services based upon an assessment of their needs (see section 8).

- 2. Estimate of Participating Families (Program Size/ Number of FSS Positions).** The Authority will endeavor to operate a FSS program that serves no less than 75 participants, with a goal of 140 active enrollees. Currently, we have 130 active participants. The Authority has no HUD-mandated FSS positions.
- 3. Eligible Families from Other Self-Sufficiency Programs.** The Authority participates in the Family Unification and Family Self-Sufficiency Demonstration program. The aim of this HUD demonstration is to evaluate the effectiveness of combining Housing Choice vouchers with assistance through the FSS program to support eligible youths participating

in the Family Unification Program (FUP) who lack adequate housing. The goal is to increase housing opportunities for youths while providing them with the requisite support to achieve self-sufficiency. We estimate 35 FUP families will actively participate in the program.

The Authority will reserve 50% of the available FSS program positions for applicants and participants enrolled in an FSS-related service program, that is, the Family Unification Program, FSS Demonstration or Pathways to Progress. Program placement is based on the date and time of application to the FSS program.

The Authority gives placement preference to families receiving services through the St. Francis Community Services' "Pathways to Progress" program. We estimate ten St. Francis clients will actively participate in the FSS program. The Authority will also enroll participants in HUD's Foster Youth to Independence Tenant Protective Vouchers program if HUD approves funding. The number of participants is contingent on HUD approval.

#### 4. FSS Family Selection Procedures

Preference in the FSS Selection Process. The Authority will place eligible families in the FSS program based on the date and time they expressed an interest in participating in the program. The Authority will reserve 50% of the available program positions for applicants and participants enrolled in an FSS-related service program.

When space is available in the FSS program, the Authority will contact the next eligible family on the FSS waiting list to complete an application for the program. Upon completion of the application, the Authority will arrange an interview with its FSS coordinator to complete an assessment of eligibility. The Authority will remove applicants from the waiting list if they do not schedule or attend this interview, or if they are not willing to sign the FSS Contract of Participation (COP).

Selection of Families with Preference. Once a family expresses interest in the FSS program by either contacting their Authority caseworker or the FSS coordinator, the Authority will provide them with a written explanation of the FSS program, if the waiting list is open. The Authority will record the notice of the offer in the resident's record and will place the family on the waiting list.

Selection of Families without Preference. The FSS coordinator will explain the benefits and requirements of the program, as well as the role of any agency with whom the Authority is partnered, at each HCV briefing/orientation. The Authority will provide prospective FSS participants with informational materials describing the program and an opportunity to make an appointment for enrollment in the FSS program. Once the maximum number of positions are filled, the Authority will place interested families on a waiting list. When program vacancies become available, the families will be notified by mail, email, and phone. The Authority will send potential FSS participants an application for the program once their name is selected from the waiting list.

Motivation as a Selection Factor. Potential FSS program participants must complete the FSS application. This initial step is an important aspect of the Authority's overall assessment of their motivation to participate in the program.

The Authority will treat all applicants equally with no preference in the selection procedure regarding race, color, religion, sex (including actual or perceived gender, identity, or sexual orientation), disability, familial status, or national origin.

## 5. Incentives to Encourage Participation

Program Escrow Account. The Authority will establish and deposit funds into a single interest-bearing account for all FSS participants, pursuant to HUD guidelines. At the family's request, the Authority, at its sole discretion, may make certain amounts of the escrow account funds available to the family prior to fulfillment of the obligations imposed by the COP. This decision will be based upon whether the family has met certain interim goals established by the COP and the use of the amounts are consistent with said contract. The Authority will make disbursements to assist the family with any costs related to completing their goals.

Individual Training and Services Plan. The Authority's FSS coordinator will assist families participating in the program in developing an Individual Training and Services Plan (ITSP) to help them determine steps necessary to become self-sufficient. The ITSP will become a component of the participant's COP. The family may change their goals or interim goals at any time to achieve self-sufficiency.

Training, Education and Workshops. The Authority will connect FSS program participants with job training, and educational and social services agencies to provide the supportive services necessary to become self-sufficient. Moreover, the Authority will provide families participating in the program with information on local homeownership opportunities.

6. **Outreach Efforts.** The Authority will distribute program promotional flyers and brochures to regional partners and at community events.
7. **FSS Activities and Supportive Services.** The first step in developing the ITSP is to identify the family's needs and required services, and then refer them to regional partner agencies. The FSS coordinator will maintain contact in-person, by mail, email, or by phone, depending on the family's needs. During contact, the family will update their progress and set new tasks and milestones, depending on the family's current situation and the goals they have chosen on their contract.

The Authority expects to receive supportive services for FSS participants from the regional agencies listed below. We anticipate that all families participating in the FSS program will receive a combination of supportive services to assist with individual needs.

- St. Frances Community Services: Provides families with legal aid, bilingual mental health services, youth programs, and case management through its Pathways to Progress program.

- Community Action Agency of St. Louis County (CAASTLC): Provides High School Equivalency Test (HiSET) case management, employment development, energy assistance, drug and alcohol education classes, life skills, food pantry, HUD-approved home ownership program, and financial literacy.
- Better Family Life: Provides the HUD-approved home ownership program, business startup training, Skill Up employment services, after school enrichment programs, Missouri Work Assistance program, and the Call Center Representative Certification.
- TRIO Education Opportunity Centers: Offers HiSET tutoring, financial aid application completion, career coaching/ career assessment, union/trade school Information, and resource referral (food, shelter, clothing, mental health).
- LifeWise STL: Offers credit repair and financial literacy programs.
- Youth IN Need: Offers free childcare, Head Start, referrals for resources, virtual and in-home-parenting education.
- St. Louis Public Schools Adult Education: Offers certificate programs, HiSET.

**8. Method for Identification of Family Support Needs.** The ITSP will identify the family's needs toward becoming self-sufficient within the following service areas.

- |                                   |  |
|-----------------------------------|--|
| • Financial aid                   | • Substance abuse, treatment, and counseling |
| • Childcare/ back-up childcare    | • Knowledge of resources                     |
| • Job training and placement      | • Home ownership and rental counseling       |
| • Homemaking and parenting skills | • Transportation insurance                   |
| • Counseling/ support groups      | • Medical insurance                          |
| • Legal services counseling       | • Advocacy                                   |
| • Money management                | • Family stability planning                  |
| • Adult basic education           | • Domestic violence issues                   |
| • Vocational education/ college   | • Personal support goal setting              |
| • Entrepreneurial training        | • Mental health referrals                    |

**9. Program Termination, Withholding of Services, and Grievance Procedures**

Program Termination. The Authority's FSS coordinator will make the decision to terminate the participating family's COP if:

- the family and the Authority mutually agree to terminate the contract.
- the family lacks the motivation to accomplish their goals.
- the Authority determines the family has not fulfilled its FSS program responsibilities.
- the family withdraws from the FSS program.
- an act occurs that is inconsistent with the purpose of the FSS program (such as non-compliance with the lease, non-compliance with HCV program family obligations, fraud, or a violent or drug-related criminal act).

- the Authority attempts to contact the family in writing, email or by phone, and the family does not respond.
- the family does not complete its COP prior to the expiration date.
- the family ports to a jurisdiction that does not have an FSS program, or the family is not accepted into the new jurisdiction's FSS program.
- the family breaches any repayment agreement owed to the Authority.
- the family misses three consecutive monthly contacts with their FSS coordinator. This is cause for automatic termination from the program.

The Authority will notify the family of the termination of its FSS COP by mail and email.

The Authority will treat all participants equally with no preference in the termination procedure regarding race, color, religion, sex (including actual or perceived gender, identity, or sexual orientation), disability, familial status, or national origin.

Grievance Procedures. The participating family may request an informal hearing within ten business days of notification to determine if the Authority made its decision to terminate FSS participation in accordance with HUD regulations and the guidelines in this plan.

Withholding of Service. The Authority, at its discretion, may deny participation in the FSS program to a family that was previously terminated from the program because it did not meet its COP obligations. The Authority may also, at its discretion, deny program participation to an applicant if the FSS coordinator believes the head of household (HOH) does not show the motivation to accomplish their goals.

- 10. Assurances of Non-interference with the Rights of Non-participating Families.** Failure to comply with the FSS program COP does not constitute reason for termination of voucher assistance.
- 11. Timetable for Program Implementation.** Graduates and participants who choose to leave the program or are terminated from the program will be replaced on the FSS waiting list by HCV residents.
- 12. Certification of Coordination.** The Authority certifies that development of services and activities under the FSS program have been coordinated with programs in the area and that implementation will be coordinated to avoid duplication of services.
- 13. Circumstances in Which the Authority Will Grant an Extension of the COP.** A participant in the FSS program may request an extension of the contract for a period not to exceed two years due to "good cause." The participant family HOH must request an extension in writing and submit it before the end of the contract. The request must include a description of the need for the extension.

Good cause is defined as circumstances, beyond the control of the FSS family, that impede the family's ability to complete the contract. Examples include serious illness or involuntary loss of employment. Good cause also includes the active pursuit of a current or additional goal that will result in furtherance of self-sufficiency during the period of the extension. Any

other circumstance that the Authority determines warrants an extension may also be considered good cause.

- 14. Policies Regarding the Interim Disbursement of Escrow, Including Limitations on the Use of Funds.** A family participating in the FSS program may request an interim disbursement of escrow funds. The Authority will inform the family within ten calendar days of the approval or disapproval of the interim disbursement request. The participant may only request an amount no greater than the current account balance. There are no limits on the number of requests per year.

The Authority will make interim disbursements if the family needs the funds to complete its COP goals (e.g., to pay for school costs or transportation to work) and the family can demonstrate completion of specific interim goals from its COP.

Participants must make requests for interim disbursements in writing and include verification that they require the funds to complete a family's goal under the COP.

At the discretion of the Authority, interim escrow disbursements may be in the form of a check payable directly to the participant, with the understanding that the participant will first submit an invoice/ bill and provide a receipt to the Authority upon settlement or disburse payment directly to the institution or business.

- 15. Policies Regarding Eligible Uses of Forfeited Escrow Funds by Families in Good Standing.**

The Authority will use FSS escrow account funds forfeited by FSS participating families for the benefit of current FSS participants in good standing. Funds will be used for transportation, childcare, training, testing fees (e.g., HiSET), and other costs related to achieving obligations outlined in the COP. The Authority may also use the funds for FSS program coordinator training or other eligible activities as determined by HUD. The Authority will disburse withdrawals in the order received by the coordinators, subject to Department director approval prior to the release of funds.

- 16. Policies Regarding the Re-enrollment of Previous FSS Participants, Including Graduates and Those Who Exited the Program Without Graduating.** The Authority may re-enroll previous graduates and non-graduates of the FSS program. These potential participants must follow the same waiting list and application process as others chosen for the program. Non-graduates will evaluate their previous experience to determine the cause of non-graduation and must establish a new ITSP. Graduates will provide a previous success story and an explanation of why they desire to participate again.

- 17. Policies Regarding Requirements for Documentation of Goal Completion.** Participants shall self-certify that they are not receiving Temporary Assistance for Needy Families (TANF); which the Authority will then verify using the official State of Missouri website (myDSS). Participants will provide recent check stubs to verify adequate employment. Case notes are an acceptable form of certification. Participants must submit documentation for specific goals such as credit scores, degrees, and certifications.

- 18. Policies Regarding Documentation, Designation, and Change of the Household's Designation of the "Head of FSS Family."** Adult family members shall vote on which adult

member will be Head of FSS Family. Once they agree, they will submit a written statement to the FSS coordinator. Each adult member will sign and date the statement indicating that they agree on the selected member to be Head of FSS Family.

19. **Policies Regarding FSS Selection Preference for Porting Families.** Current FSS participants porting into the Authority will receive preference for program selection.
20. **Policies Regarding the modification of goals in the ITSP, Including Limits on Modifications as Participants Approach Graduation.** The family and the Authority may agree to modify goals at any time during the contract and extension period to reflect changes in the participant's circumstances or interests.

## PET POLICY

### PART I: ASSISTANCE ANIMALS

#### APPROVAL OF ASSISTANCE ANIMALS [Notice FHEO 2020-01]

**Service Animals.** For an animal to be excluded from the pet policy and be considered a *service animal*, it must be a trained dog, and there must be a person with disabilities in the household who requires the dog's services.

For an animal to be excluded from the pet policy and be considered a *support animal*, there must be a person with disabilities in the household, there must be a disability-related need for the animal, and the Authority must approve a request from the family for a reasonable accommodation in accordance with the criteria outlined in HUD's Fair Housing and Equal Opportunity (FHEO) Notice 2020-01 and in Chapter 2 of the Authority's Admissions and Continued Occupancy Policy (ACOP).

**Care and Handling.** Residents are responsible for feeding, maintaining, providing veterinary care, and controlling their assistance animals. A resident may do this on his or her own or with the assistance of family, friends, volunteers, or service providers.

Residents must care for assistance animals in a manner that complies with state and local laws, including anti-cruelty laws.

Residents must ensure that assistance animals do not pose a direct threat to the health or safety of others, or cause substantial physical damage to the development, dwelling, or property of other residents.

When a resident's care or handling of an assistance animal violates these policies, the Authority will consider whether the violation could be reduced or eliminated by a reasonable accommodation. If the Authority determines that no such accommodation can be made, it may withdraw the approval of a particular assistance animal.

### PART II: PET POLICIES FOR ALL DEVELOPMENTS

#### MANAGEMENT APPROVAL OF PETS

**Registration of Pets.** Pets must be registered with the Authority before they are brought onto the premises. Registration includes documentation signed by a licensed veterinarian or state/local authority that the pet has received all inoculations required by state or local law, and that the pet has no communicable disease(s) and is pest-free. This registration must be renewed annually and will be coordinated with the annual reexamination date.

Pets will not be approved to reside in a unit until completion of the registration requirements.

## Attachment 3: Pet Policy

**Refusal to Register Pets.** The Authority will refuse to register a pet for the following reasons.

- The pet is not a *common household pet* as defined in the ACOP, Section 10-II.C. below.
- Keeping the pet would violate any pet restrictions listed in this policy.
- The pet owner fails to provide complete pet registration information or fails to update the registration annually.
- The applicant has previously been charged with animal cruelty under state or local law; or has been evicted, had to relinquish a pet, or been prohibited from future pet ownership due to pet rule violations or a court order
- The Authority reasonably determines that the pet owner is unable to keep the pet in compliance with the pet rules and other lease obligations. The pet's temperament and behavior may be considered as a factor in determining the pet owner's ability to comply with provisions of the lease.

If the Authority refuses to register a pet, it will send a written notification to the pet owner within ten business days of the decision. The notice will state the reason for refusing to register the pet and will inform the family of their right to appeal the decision, in accordance with the Authority's grievance procedures.

**Pet Agreement.** Residents who have been approved to have a pet must enter into a pet agreement with the Authority, or the approval of the pet will be withdrawn.

The pet agreement is the resident's certification that they have received a copy of the Authority's pet policy and applicable house rules, that they have read the policies and rules, understand them, and agree to comply with them.

The resident further certifies by signing the pet agreement that they understand that noncompliance with the Authority's pet policy and applicable house rules may result in the Authority withdrawing approval of the pet or termination of tenancy.

## STANDARDS FOR PETS

**Definition of "Common Household Pet."** *Common household pet* means a domesticated animal, such as a dog, cat, bird, or fish that is traditionally recognized as a companion animal and is kept in the home for pleasure rather than commercial purposes. The following animals are not considered common household pets:

- reptiles,
- rodents,
- insects,
- arachnids,
- wild animals or feral animals,
- pot-bellied pigs,
- and animals used for commercial breeding.

**Pet Restrictions.** The following animals are not permitted:

- Any animal whose adult weight will exceed 40 pounds.
- Dogs of the pit bull, rottweiler, chow, or boxer breeds.
- Ferrets or other animals whose natural protective mechanisms pose a risk to small children of serious bites or lacerations.
- Any animal not permitted under state or local law or code.

**Number of Pets.** Residents may own a maximum of two pets, only one of which may be a dog. In the case of fish, residents may keep no more than can be maintained in a safe and healthy manner in a tank holding up to 10 gallons. Such a tank or aquarium will be counted as one pet.

**Other Requirements.** Dogs and cats must be spayed or neutered at the time of registration or, in the case of underage animals, within 30 days of the pet reaching six months of age. Exceptions may be made upon veterinary certification that subjecting this pet to the procedure would be temporarily or permanently medically unsafe or unnecessary.

Pets must be licensed in accordance with state or local law. Residents must provide proof of licensing at the time of registration and annually, in conjunction with the resident's annual reexamination.

## PET RULES

**Pet Area Restrictions.** Pets must be maintained within the resident's unit. When outside of the unit (within the building or on the grounds) dogs and cats must be kept on a leash or carried. They must be always under the resident's or another responsible individual's control.

Pets other than dogs or cats must be kept in a cage or carrier when outside of the unit.

Pets are not permitted in common areas including lobbies, community rooms and laundry areas except for those common areas which are entrances to and exits from the building.

Pet owners are not permitted to exercise pets or permit pets to deposit waste on premises outside of the areas designated for such purposes.

**Designated Pet/ No-Pet Areas.** Apart from common areas as described in the previous policy, the Authority has not designated any buildings, floors of buildings, or sections of buildings as no-pet areas. In addition, the Authority has not designated any buildings, floors of buildings, or sections of buildings for residency of pet-owning tenants.

**Cleanliness.** The pet owner shall be responsible for the removal of waste from the exercise area by placing it in a sealed plastic bag and disposing of it.

The pet owner shall take adequate precautions to eliminate any pet odors within or around the unit and to always maintain the unit in a sanitary condition.

Litter box requirements:

- Pet owners must promptly dispose of waste from litter boxes and must maintain litter boxes in a sanitary manner.
- Litter shall not be disposed of by being flushed through a toilet. Litter boxes shall be kept inside the resident's dwelling unit.

**Alterations to Unit.** Pet owners shall not alter their unit, patio, premises, or common areas to create an enclosure for any animal. Installation of pet doors is prohibited.

**Noise.** Pet owners must agree to control the noise of pets such that it does not constitute a nuisance to other residents or interrupt their peaceful enjoyment of their housing or premises. This includes, but is not limited to loud or continuous barking, howling, whining, biting, scratching, chirping, or other such activities.

### Attachment 3: Pet Policy

**Pet Care.** Each pet owner shall be responsible for adequate care, nutrition, exercise, and medical attention for their pet.

Each pet owner shall be responsible for appropriately training and caring for their pet to ensure that the pet is not a nuisance or danger to other residents and does not damage Authority property.

No animals may be tethered or chained inside or outside the dwelling unit at any time.

**Responsible Parties.** The Authority shall require the pet owner to designate one responsible party for the care of the pet if the health or safety of the pet is threatened by the death or incapacity of the pet owner, or by other factors that render the pet owner unable to care for the pet.

A resident who cares for another resident's pet must notify the Authority and sign a statement that they agree to abide by all the pet rules.

**Pets Temporarily on the Premises.** Pets that are not owned by a resident are not allowed on the premises. Residents are prohibited from feeding or harboring stray animals. This rule does not apply to visiting pet programs approved by the Authority and sponsored by the Humane Society or other non-profit organization.

**Pet Rule Violations.** All complaints of cruelty and dog bites will be referred to local animal control or an applicable agency for investigation and enforcement.

If, based on objective facts supported by written statements, the Authority determines that a resident/pet owner has violated the pet rules, it will serve them a written notice. The notice will contain a brief statement of the factual basis for the determination and the pet rule(s) that were violated.

The notice will also state:

- that the pet owner has ten business days from the effective date of the service of notice to correct the violation or make written request for a meeting to discuss the violation.
- that the pet owner is entitled to be accompanied by another person of their choice at the meeting.
- that the pet owner's failure to correct the violation, request a meeting, or appear at a requested meeting may result in initiation of procedures to remove the pet, or to terminate the pet owner's tenancy.

## Attachment 3: Pet Policy

**Notice for Pet Removal.** If the pet owner and the Authority are unable to resolve the violation at the meeting or the pet owner fails to correct the violation in the time allotted by the Authority, the Authority may serve notice to remove the pet.

The notice will contain:

- a brief statement of the factual basis for the Authority's determination of the pet rule that has been violated.
- the requirement that the resident/pet owner must remove the pet within 30 calendar days of the notice.
- a statement that failure to remove the pet may result in the initiation of termination of tenancy procedures

**Pet Removal.** If the death or incapacity of the pet owner threatens the health or safety of the pet, or other factors occur that render the owner unable to care for the pet, the situation will be reported to the responsible party designated by the pet owner.

If the responsible party is unwilling or unable to care for the pet, or if the Authority after reasonable efforts cannot contact the responsible party, the Authority may contact the appropriate state or local agency and request the removal of the pet.

**Termination of Tenancy.** The Authority may initiate procedures for termination of tenancy based on a pet rule violation if:

- the pet owner has failed to remove the pet or correct a pet rule violation within the time specified.
- the pet rule violation is sufficient to begin procedures to terminate tenancy under terms of the lease.

**Emergencies.** The Authority will take all necessary steps to ensure that pets that become vicious, display symptoms of severe illness, or demonstrate behavior that constitutes an immediate threat to the health or safety of others, are immediately removed from the premises by referring the situation to the appropriate state or local entity authorized to remove such animals.

If it is necessary for the Authority to place the pet in a shelter facility, the cost will be the responsibility of the pet owner.

If the pet is removed because of any aggressive act on the part of the pet, the pet will not be allowed back on the premises.

## PET DEPOSITS AND FEES IN GENERAL OCCUPANCY DEVELOPMENTS

### PET DEPOSITS

**Payment of Deposit.** Pet owners are required to pay a pet deposit of \$200 in addition to any other required deposits. The deposit must be paid in full before the pet is brought on the premises. The pet deposit is not part of rent payable by the resident.

**Refund of Deposit.** The Authority will refund the pet deposit to the resident, less the costs of any damages caused by the pet to the dwelling unit, within 30 days of move-out or removal of the pet from the unit.

The resident will be billed for any amount that exceeds the pet deposit.

The Authority will provide the resident with a written list of any charges against the pet deposit within 10 business days of the move-out inspection. If the resident disagrees with the amount charged to the pet deposit, the Authority will provide a meeting to discuss the charges.

### NON-REFUNDABLE NOMINAL PET FEE

The Authority requires pet owners to pay a non-refundable nominal pet fee. This fee is intended to cover the reasonable operating costs to the project relating to the presence of pets. Reasonable operating costs to the project relating to the presence of pets include, but are not limited to:

- landscaping costs,
- pest control costs,
- insurance costs,
- and clean-up costs,

The pet fee of \$10 will be billed monthly, and payment will be due 14 calendar days after billing.

Charges for the non-refundable pet fee are not part of rent payable by the resident.

## Attachment 3: Pet Policy

### OTHER CHARGES

**Pet-Related Damages During Occupancy.** All reasonable expenses incurred by the Authority as a result of damages directly attributable to the presence of the pet in the development will be the responsibility of the resident, including:

- the cost of repairs and replacements to the resident's dwelling unit,
- fumigation of the dwelling unit,
- and repairs to common areas of the development.

The expense of flea elimination shall also be the responsibility of the resident.

If the resident is in occupancy when such costs occur, they shall be billed for costs in accordance with the policies in the ACOP, Section 8-I.G, Maintenance and Damage Charges. Pet deposits will not be applied to the costs of pet-related damages during occupancy.

Charges for pet-related damage are not part of rent payable by the resident.

**Pet Waste Removal Charge.** A separate pet waste removal charge of \$10 per occurrence will be assessed against pet owners who fail to remove pet waste in accordance with this policy. Such charges will be due and payable 14 calendar days after billing. Charges for pet waste removal are not part of rent payable by the resident.