

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

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

Definitions.

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

A.	PHA Information.																	
A.1	<p> PHA Name: _____ Housing Authority of St. Louis County _____ PHA Code: _____ MO-004 _____ PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): _____ 01/2024 _____ PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units _____ 309 _____ Number of Housing Choice Vouchers (HCVs) _____ 6,718 _____ Total Combined Units/Vouchers _____ 7,027 _____ PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. 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> <u>The Draft 2024 PHA Annual Plan is available for viewing at the following locations:</u> </p> <table style="width: 100%; border: none;"> <tr> <td style="width: 33%; border: none;"> PHA Main Administrative Office 8865 Natural Bridge Road St. Louis, MO 63121 </td> <td style="width: 33%; border: none;"> PHA Site Management Office Arbor Hill 133 Grape Avenue Maryland Heights, MO 63043 </td> <td style="width: 33%; border: none;"> PHA Site Management Office Highview 2876 West Pasture St. Louis, MO 63114 </td> </tr> </table> <p> Housing Authority of St. Louis County Website at www.haslc.com </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">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 style="height: 30px;">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	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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B.	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>STATEMENT OF HOUSING NEEDS AND STRATEGY FOR ADDRESSING HOUSING NEEDS</p> <p>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, in St. Louis County where one lives also matters. Access to jobs, transit, quality schools, and healthcare all shape a person’s future.</p> <p>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.</p> <p>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 certain races and ethnicities. The U.S. Department of Housing and Urban Development (HUD) has identified four major housing problems affecting low- and moderate-income households:</p> <ul style="list-style-type: none"> • 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). <p>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 certain races and ethnic groups.</p> <p><u>Housing Needs for Extremely Low-income Families (30% AMI)</u></p> <p>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. 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 2019, of the 405,985 households in St. Louis County, there are 29,990 renter households and 48,175 total households 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.</p> <p>Extremely low-income households face a severe shortage of housing supply. According to the Affordable STL's <i>Affordable Housing Report Card (2021)</i> 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.</p> <p>Currently, there are approximately 442,243 housing units for 998,684 people in the County, according to St. Louis County’s 2021-2025 <i>Affordable Housing and Homeless Services Investment Strategic Plan</i>. 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. The greatest need in the St. Louis region is for one-, two-, and three-bedroom affordable units.</p> <p>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 <i>Analysis of Impediments to Fair Housing Choice (2021)</i>, 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</p>

maintaining them can create a significant financial challenge for low-to moderate-income households. According to St. Louis County's *Consolidated Plan (2021)* data, in St. Louis County 745 extremely low-income rental 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), affect 797 extremely low-income rental households.

Affordable housing in the County tends to be concentrated in areas of low opportunity that lack the resources of areas of high opportunity. 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 (2021)* 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 (2021)*, 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 adults to age in place. Harvard University's Joint Center for Housing Studies' *State of the Nation's Housing Report (2022)* states that most U.S. homes across the country 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 make it difficult for families with disabilities to find housing. The short 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 to 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 in where resources are allocated. 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 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 (2021)*, 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 the upkeep is more difficult. The *Affordable Housing Report Card (2021)* 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.

Strategy for Addressing Housing Needs

The PHA developed internal and external strategies and is taking a data-driven approach to addressing clients' housing needs. The Authority adopted the following core objectives and key results to measure its progress in 2023:

Objective 1: Deliver services safely, effectively, and efficiently.

The first objective speaks to establishing excellence in the Authority's basic operations. Streamlined processes and procedures and an emphasis on quality control ensure that residents' housing needs are met. Findings on the finance/single audit along with earned PHAS, SEMAP, and MHDC scores indicate how well those processes and procedures work.

Objective 2: Ensure residents, landlords, and employees feel respected during interactions with the Authority.

Every client or employee at the PHA deserves to be treated with respect and empathy. Staff is working to increase customer service quality so that it is easy to do business with the Authority, simple to find the information that residents need, that employees are helpful and care, and that everyone is treated fairly.

Objective 3: Help our residents and families gain self-sufficiency through partnerships with other organizations in the community.

Last year, the PHA completed a partnership plan to establish which organizations in the community can aid in providing supportive services to residents. These partnerships are prioritized based on the services they offer and their capacity to serve Authority residents. A team is currently working on putting more formal relationships in place in order to increase housing stability and self-sufficiency for residents.

Objective 4: Expand access to desirable and affordable housing.

The Authority's strategy for expanding access will be targeted at:

- a. Primarily extremely low-income (30% AMI), elderly, and disabled households; using an equity lens, to:
 - i. Increase production of rental units
 - ii. Preserve existing units
 - iii. Improve quality and eliminate substandard housing
 - iv. Improve housing stability
- b. New production for lower income levels, including workforce and mixed-income housing.
- c. Increasing homeownership opportunities.
- d. Increasing mobility.

DECONCENTRATION AND OTHER POLICIES THAT GOVERN ELIGIBILITY, SELECTION, AND ADMISSIONS

Please see Section B.1(c) of this document for the Authority's De-concentration Policy.

The Authority is in the process of revising its Admissions and Continued Occupancy Policy (ACOP). Please see Attachment 1: Applications, Waiting List and Tenant Selection for the drafted update to this policy within the ACOP.

FINANCIAL RESOURCES

Annual Contribution by Program - 2024

Housing Choice Voucher	61,077,760
Mainstream Voucher	2,350,723
Emergency Housing Voucher	1,302,455
Family Self-Sufficiency	189,000
Moderate Rehab	162,705
Operating Subsidy	812,059
Capital Funds	1,717,217
	<hr/>
	67,611,919

RENT DETERMINATION

*Revisions pending HOTMA requirements

OPERATION AND MANAGEMENT

Please see Attachment 2: Operation and Management for the drafted update to this policy within the ACOP.

GRIEVANCE PROCEDURES

Please see Attachment 3: Grievance Procedures for the drafted update to this policy within the ACOP.

COMMUNITY SERVICE AND SELF-SUFFICIENCY PROGRAMS

Please see Attachment 4: Priority Partnership Framework; and Attachment 5: Community Service and Self-Sufficiency Policy

(c) The PHA must submit its De-concentration Policy for Field Office review.

DE-CONCENTRATION POLICY

The Authority will use greater flexibility in attracting households with broader ranges of income. The Authority will continue to reassess flat rental amounts annually in public housing developments to potentially attract higher-income families and will continue to offer the choice of flat rent or income-based rent to residents residing in the developments. 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 Landlord Liaisons.

A goal of the Landlord Liaisons is to connect with current and prospective property owners and landlords for the Housing Choice Voucher (HCV) program. The Landlord Liaisons will attempt to make these connections and refer HCV participants to property owners in high opportunity areas, and they continue to facilitate educational landlord meetings to attract and inform prospective landlords about the HCV program and its benefits.

The Authority is also updating its Community Service and Self-Sufficiency Requirements (CSSR) and Family Self-Sufficiency (FSS) program. The updates to the CSSR will offer more guidance and structure for public housing residents who are required to complete community service or self-sufficiency hours. Updates to the FSS program and continued administration of the program will allow the Authority to offer more direct support to program participants. Both the CSSR and FSS program will encourage and support participants in building wealth and gaining a better understanding of how to maintain self-sufficiency.

The Authority has also successfully begun establishing partnerships with other service agencies to offer more supportive services and resources to all its service population. These updates, new partnerships, and continued administration of the Family Self-Sufficiency will benefit participants and help deconcentrate poverty.

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

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

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

MIXED FINANCE MODERNIZATION OR DEVELOPMENT

The Authority has received low-income housing tax credits (LIHTC) for Arbor Hill Apartments as part of its activity for encouraging private equity investment in the development of affordable rental housing for low-income households. The Authority will build 68 new income-restricted housing units.

The Authority is also partnering with Peace United Church of Christ to develop approximately 48 affordable senior housing units in Webster Groves. This project will be funded in part with the equity from LIHTC and the Authority is examining the possibility of providing Project Based Vouchers to the project. This development will work to further the availability of affordable housing in opportunity areas and supports the goals of the mobility program.

CONVERSION OF PUBLIC HOUSING TO PROJECT-BASED RENTAL ASSISTANCE OR PROJECT-BASED VOUCHERS UNDER RAD

The Authority is in the process of converting the Arbor Hill Apartments to private ownership under HUD’s RAD program, using low-income housing tax credits.

PROJECT-BASED VOUCHERS

The Authority will allocate 186 project-based vouchers to the new development, Wellington Family Homes. The Authority will continue to maintain and manage the waiting list for project-based vouchers at Wellington Family Homes.

	<p>The Authority is also examining the possibility of providing project-based vouchers for the Webster Groves project with Peace United Church of Christ. The project will develop 48 affordable senior housing units in Webster Groves.</p> <p>The Authority has also successfully issued a Project-Based Voucher Request for Proposal (RFP) to begin allocating more project-based vouchers.</p>
<p>B.3</p>	<p>Progress Report. 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 and Key Results</u> In executing its mission, the Authority adopted four guiding objectives in 2021. The 2023 key results communicate to our employees, board members, and external stakeholders how well the agency is performing:</p> <p>Objective 1: Deliver services safely, effectively, and efficiently.</p> <ul style="list-style-type: none"> ● Key Results <ul style="list-style-type: none"> ○ Number of findings on our finance/single audit scores ○ PHAS score ○ SEMAP score ○ MHDC scores <p>Objective 2: Ensure residents, landlords, and employees feel respected during interactions with the Authority.</p> <ul style="list-style-type: none"> ● Key Results <ul style="list-style-type: none"> ○ Active implementation of deliverables by the Customer Service Improvement Team ○ Increase in customer satisfaction <p>Objective 3: Help our residents and families gain self-sufficiency through partnerships with other organizations in the community.</p> <ul style="list-style-type: none"> ● Key Results <ul style="list-style-type: none"> ○ Active implementation of deliverables by the Partnership Improvement Team ○ Formally establish 3-5 Level 1 (emergency housing and crisis support) partnerships <p>Objective 4: Expand access to desirable and affordable housing.</p> <ul style="list-style-type: none"> ● Key Results <ul style="list-style-type: none"> ○ Close Wellston financing ○ Close Arbor Hill financing ○ Successful implementation of project-based voucher (PBV) request for proposal (RFP) <p>Thus far in 2023, Authority staff has made progress on a number of key results. After bringing the property management function of a number of sites in-house, public housing staff is developing new ways to ensure quality control in its programming. The Authority additionally formed two groups dedicated to improving customer service and providing additional support to residents through relationships with partner organizations. Staff deployed a customer satisfaction survey at the end of 2022 to Housing Choice Voucher (HCV) and public housing residents and landlords to determine a baseline for improving customer service. A streamlining of internal processes and the acquisition of new tools for communicating with residents are top priority for the organization to improve the way it does business with residents, landlords, and partner organizations.</p> <p>To improve supportive services to residents, a Partnership Improvement Team is currently putting in place a number of Memorandum of Understanding (MOUs) with community organizations. The team is prioritizing relationships with organizations who can provide emergency housing and crisis support to residents, with the end goal of increasing residents' housing stability and self-sufficiency.</p> <p>In a step towards expanding safe and affordable housing access in the county, the team finalized the closing of a \$44 million low-income housing tax credit project to rehabilitate 186 affordable housing units in the City of Wellston in March. Construction will begin in the summer of 2023 on these units initially slated for demolition. Former Wellston residents will have the first right to return. Authority staff is also working on closing a 4% tax credit deal to redevelop its Arbor Hill public housing to meet the changing needs of residents. Additionally, the development staff issued a request for proposals for project-based vouchers in new and existing developments.</p>
<p>B.4</p>	<p>Capital Improvements. 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 2022-2026 Capital Fund 5 Year Action Plan in EPIC approved by HUD on 12/21/2021.</p>

<p>B.5</p>	<p>Most Recent Fiscal Year Audit.</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>(b) 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>C. Other Document and/or Certification Requirements.</p>	
<p>C.1</p>	<p>Resident Advisory Board (RAB) Comments.</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>C.2</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <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>
<p>C.3</p>	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</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>
<p>C.4</p>	<p>Challenged Elements. 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>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
<p>C.5</p>	<p>Troubled PHA.</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>
<p>D. Affirmatively Furthering Fair Housing (AFFH).</p>	
<p>D.1</p>	<p>Affirmatively Furthering Fair Housing (AFFH).</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</p>

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.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

APPLICATIONS, WAITING LIST AND TENANT SELECTION

INTRODUCTION

When a family wishes to reside in public housing, the family must submit an application that provides the Authority with the information needed to determine the family's eligibility. HUD requires the Authority to place all eligible families that apply for public housing on a waiting list. When a unit becomes available, the Authority must select families from the waiting list in accordance with HUD requirements and Authority policies as stated in its Admissions and Continued Occupancy Policy (ACOP) and its annual plan.

The Authority is required to adopt a clear approach to accepting applications, placing families on the waiting list, and selecting families from the waiting list, and must follow this approach consistently. The actual order in which families are selected from the waiting list can be affected if a family has certain characteristics designated by HUD or the Authority to receive preferential treatment.

HUD regulations require that the Authority comply with all equal opportunity requirements, and it must affirmatively further fair housing goals in the administration of the program [24 CFR 960.103, PH Occ GB p. 13]. Adherence to the selection policies described in this document ensures that the Authority will be in compliance with all relevant fair housing requirements, as described in Chapter 2 of the ACOP.

THE APPLICATION PROCESS

OVERVIEW

This part describes the policies that guide the Authority's efforts to distribute and accept applications, and to make preliminary determinations of applicant family eligibility that affect placement of the family on the waiting list. This part also describes the Authority's obligation to ensure the accessibility of the application process.

APPLYING FOR ASSISTANCE

Any family that wishes to reside in public housing must apply for admission to the program [24 CFR 1.4(b)(2)(ii), 24 CFR 960.202(a)(2)(iv), and PH Occ GB, p. 68]. HUD permits the Authority to determine the format and content of its applications, as well as how such applications will be made available to interested families and how applications will be accepted by the Authority. However, the Authority must include Form HUD-92006, Supplement to Application for Federally Assisted Housing, as part of the Authority's application [Notice PIH 2009-36].

The Authority's Policy

A two-step application process will be used by the Authority. Under their two-step application process, the Authority initially will require families to provide only the information needed to make an initial assessment of the family's eligibility, and to determine the family's placement on the waiting list. The family will be required to provide all the information necessary to establish family eligibility and the amount of rent the family will pay when the family is selected from the waiting list.

Families may access applications online using Rent Café, an online registration and application portal. If families are unable to complete the online version of the application, they may contact the Authority's office during normal business hours to schedule an appointment to complete the application in person. Families may also request - by telephone, email, or by mail - that an application form be sent to the family via first class mail.

Completed applications must be submitted to the Authority through Rent Café, by email, mail, or dropped-off at the Authority office. Applications must be filled out completely in order to be accepted by the Authority for processing. If an application is incomplete, the Authority will notify the family of the additional information required.

ACCESSIBILITY OF THE APPLICATION PROCESS

The Authority must take a variety of steps to ensure that the application process is accessible to those people who might have difficulty complying with the standard Authority application process.

Disabled Populations [24 CFR 8; PH Occ GB, p. 68]

The Authority must provide reasonable accommodation as needed for persons with disabilities to make the application process fully accessible. The facility where applications are accepted and the application process must be fully accessible, or the Authority must provide an alternate approach that provides equal access to the program. Chapter 2 of the ACOP provides a full discussion of the Authority's policies related to providing reasonable accommodations for people with disabilities.

Attachment 1: Applications, Waiting List and Tenant Selection

Limited English Proficiency

Public Housing Agencies (PHA) are required to take reasonable steps to ensure meaningful access to their programs and activities by persons with limited English proficiency [24 CFR 1]. Chapter 2 of the ACOP provides a full discussion on the Authority's policies related to ensuring access to people with limited English proficiency (LEP).

PLACEMENT ON THE WAITING LIST

The Authority must review each completed application received and make a preliminary assessment of the family's eligibility. Applicants for whom the waiting list is open must be placed on the waiting list unless the Authority determines the family to be ineligible. Where the family is determined to be ineligible, the Authority must notify the family in writing [24 CFR 960.208(a); PH Occ GB, p. 41].

No applicant has a right or entitlement to be listed on the waiting list, or to any particular position on the waiting list.

Ineligible for Placement on the Waiting List

Authority Policy

If the Authority determines from the information provided that a family is ineligible, the family will not be placed on the waiting list. When a family is determined to be ineligible, the Authority will send written notification of the ineligibility determination within 30 business days of receipt of the completed application. The notice will specify the reasons for ineligibility and will inform the family of its right to request an informal hearing and explain the process for doing so (see Chapter 14 of the ACOP).

Eligible for Placement on the Waiting List

Authority Policy

The Authority will send written notification of the preliminary eligibility determination within 30 business days of receiving a completed application. If applicable, the notice will also indicate the waiting list preference(s) for which the family appears to qualify.

Applicants will be placed on the waiting list using a lottery system. Once each application has been randomly assigned a number, the applications will be placed on the waiting list in order of the assigned numbers.

The Authority will assign families on the waiting list according to the bedroom size for which a family qualifies as established in its occupancy standards (see Chapter 5 of the ACOP).

Placement on the waiting list does not indicate that the family is, in fact, eligible for admission. When the family is selected from the waiting list, the Authority will verify any preference(s) claimed and determine eligibility and suitability for admission to the program.

MANAGING THE WAITING LIST

OVERVIEW

The Authority must have policies regarding the type of waiting list it will utilize as well as how the waiting list will be organized and managed. This includes policies on notifying the public on the opening and closing of the waiting list to new applicants, updating family information, purging the list of families that are no longer interested in or eligible for public housing, and conducting outreach to ensure a sufficient number of applicants.

In addition, HUD imposes requirements on how the Authority may structure its waiting list and how families must be treated if they apply for public housing at a PHA that administers more than one assisted housing program.

ORGANIZATION OF THE WAITING LIST

The Authority's public housing waiting list must be organized in such a manner to allow the Authority to accurately identify and select families in the proper order, according to the admissions policies described in the ACOP.

Authority Policy

The waiting list will contain the following information for each applicant listed:

- Names, birth dates, and social security numbers of all family members

- Unit size required (number of family members)

- Amount and source of annual income

- Mailing address, phone numbers, and email address

- Accessibility requirement, if any

- Household type (family, elderly, disabled)

- Admission preference, if any

- Race and ethnicity of the head of household

- Citizenship/eligible immigration status

The Authority will maintain one single community-wide waiting list for its developments. Within the list, the Authority will designate subparts to easily identify who should be offered the next available unit (i.e., unit size and accessible units).

The Authority will not adopt site-based waiting lists.

HUD requires that public housing applicants must be offered the opportunity to be placed on the waiting list for any tenant-based or project-based voucher or moderate rehabilitation program that the Authority operates if 1) the other programs' waiting lists are open, and 2) the family is qualified for the other programs [24 CFR 982.205(a)(2)(i)].

HUD permits, but does not require, that PHAs maintain a single merged waiting list for their public housing, Housing Choice Voucher program, and other subsidized housing programs [24 CFR 982.205(a)(1)].

Attachment 1: Applications, Waiting List and Tenant Selection

Authority Policy

The Authority will not merge the public housing waiting list with the waiting list for any other program the Authority operates.

OPENING AND CLOSING THE WAITING LIST

Closing the Waiting List

Authority Policy

The Authority will close the waiting list, in whole or in part, if it has an adequate pool of families to fully lease its developments. The authority may close the waiting list completely, or restrict intake by preference, type of project, or by size and type of dwelling unit.

Reopening the Waiting List

If the waiting list has been closed, it may be reopened at any time. The Authority should publish a notice announcing the opening of the waiting list in local newspapers of general circulation, minority media, and other suitable media outlets. Such notice must comply with HUD fair housing requirements. The Authority should specify who may apply, and where and when applications will be received.

Authority Policy

The Authority will announce the reopening of the waiting list at least 10 business days prior to the date applications will first be accepted. If the list is only being reopened for certain categories of families, this information will be contained in the notice. The notice will specify where, when, and how applications are to be received.

The Authority will give public notice by publishing the relevant information in suitable media outlets including, but not limited to:

The Authority's website

St. Louis Post Dispatch

Available minority publications

FAMILY OUTREACH [24 CFR 903.2(d); 24 CFR 903.7(a) and (b)]

The Authority should conduct outreach as necessary to ensure that the Authority has a sufficient number of applicants on the waiting list to fill anticipated vacancies and to assure that the Authority is affirmatively furthering fair housing and complying with the Fair Housing Act.

Because HUD requires the Authority to admit a specified percentage of extremely low-income families, the Authority may need to conduct special outreach to ensure that an adequate number of such families apply for public housing.

Authority outreach efforts must comply with fair housing requirements. This includes:

- Analyzing the housing market area and the populations currently being served to identify underserved populations
- Ensuring that outreach efforts are targeted to media outlets that reach eligible populations that are underrepresented in the program

Attachment 1: Applications, Waiting List and Tenant Selection

- Avoiding outreach efforts that prefer or exclude people who are members of a protected class

Authority outreach efforts must be designed to inform qualified families about the availability of units under the program. These efforts may include, as needed, any of the following activities:

- Submitting press releases to local newspapers, including minority newspapers
- Developing informational materials and flyers to distribute to other agencies
- Providing application forms to other public and private agencies that serve the low income population
- Developing partnerships with other organizations that serve similar populations, including agencies that provide services for persons with disabilities

Authority Policy

The Authority will monitor the characteristics of the population being served and the characteristics of the population as a whole in the Authority's jurisdiction. Targeted outreach efforts will be undertaken if a comparison suggests that certain populations are being underserved.

REPORTING CHANGES IN FAMILY CIRCUMSTANCES

Authority Policy

While the family is on the waiting list, the family must inform the Authority of changes in family size or composition, preference status, or contact information, including current residence, mailing address, and phone number. The changes must be submitted in the online Rent Café system, or by email.

Changes in an applicant's circumstances while on the waiting list may affect the family's qualification for a particular bedroom size or entitlement to a preference. When an applicant reports a change that affects their placement on the waiting list, the waiting list will be updated accordingly.

UPDATING THE WAITING LIST

HUD requires the Authority to establish policies that describe the circumstances under which applicants will be removed from the waiting list [24 CFR 960.202(a)(2)(iv)].

Purging the Waiting List

The decision to remove an applicant family that includes a person with disabilities from the waiting list is subject to reasonable accommodation. If the applicant did not respond to the Authority's request for information or updates because of the family member's disability, the Authority must, upon the family's request, reinstate the applicant family to their former position on the waiting list as a reasonable accommodation [24 CFR 8.4(a), 24 CFR 100.204(a), and PH Occ GB, p. 39 and 40]. See Chapter 2 of the ACOP for further information regarding reasonable accommodations.

Authority Policy

The waiting list will be updated as needed to ensure that all applicant information is current and timely.

Attachment 1: Applications, Waiting List and Tenant Selection

To update the waiting list, the Authority will send an update request via email to each family on the waiting list to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last email address that the Authority has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list.

The family's response to the update request must be in writing and may be delivered in person by appointment, by mail, by email, by fax, or by updating family information in Rent Café. Responses should be postmarked or received by the Authority not later than 10 business days from the date of the Authority letter.

If updates to applications are made by the applicant family in Rent Café, Authority staff must review and approve the updates. Applicants will not be able to see the updated information in Rent Café until Authority staff has approved the changes. Once changes are approved, an email will be sent to the applicant informing them that the changes were approved. Authority staff will review changes in Rent Café within 10 business days.

If the family fails to respond to update requests from the Authority within 10 business days, the family will be removed from the waiting list without further notice.

If the update request is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice.

If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 10 business days to respond from the date the letter was re-sent. If the family fails to respond within this time frame, the family will be removed from the waiting list without further notice.

When a family is removed from the waiting list during the update process for failure to respond, the Authority will contact an unresponsive applicant through all means available, which may include via mail, phone, email, and text message. The Authority will give that family a reasonable period of time to respond with their interest to not inadvertently remove an applicant who remains interested but may have moved, changed their contact information, or otherwise are difficult to reach. No informal hearing will be offered in such cases. Such failures to act on the part of the applicant prevent the Authority from making an eligibility determination; therefore, no informal hearing is required.

If a family is removed from the waiting list for failure to respond, the Authority may reinstate the family if the lack of response was due to Authority error, or to circumstances beyond the family's control, as a result of a family member's disability, or as a direct result of status as a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, including an adverse factor resulting from such abuse.

Removal from the Waiting List

Authority Policy

The Authority will remove an applicant from the waiting list upon request by the applicant family. In such cases no informal hearing is required.

Attachment 1: Applications, Waiting List and Tenant Selection

If the Authority determines that the family is not eligible for admission at any time while the family is on the waiting list, the family will be removed from the waiting list.

If a family is removed from the waiting list because the Authority has determined the family is not eligible for admission, a notice will be sent to the family's email address of record as well as to any alternate address provided on the initial application. The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal hearing regarding the Authority's decision [24 CFR 960.208(a)].

TENANT SELECTION

OVERVIEW

The Authority must establish tenant selection policies for families being admitted to public housing [24 CFR 960.201(a)]. The Authority must not require any specific income or racial quotas for any developments [24 CFR 903.2(d)]. The Authority must not assign persons to a particular section of a community or to a development or building based on race, color, religion, sex, disability, familial status, or national origin for purposes of segregating populations [24 CFR 1.4(b)(1)(iii) and 24 CFR 903.2(d)(1)].

The order in which families will be selected from the waiting list depends on the selection method chosen by the Authority and is impacted in part by any selection preferences that the family qualifies for. The availability of units also may affect the order in which families are selected from the waiting list.

The Authority must maintain a clear record of all information required to verify that the family is selected from the waiting list according to the Authority's selection policies [24 CFR 960.206(e)(2)]. The Authority's policies must be posted any place where the Authority receives applications. The Authority must provide a copy of its tenant selection policies upon request to any applicant or tenant. The Authority may charge the family for providing a copy of its tenant selection policies [24 CFR 960.202(c)(2)].

Authority Policy

When an applicant or resident family requests a copy of the Authority's tenant selection policies, the Authority will provide copies to them free of charge.

SELECTION METHOD

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that will be used.

Local Preferences [24 CFR 960.206]

PHAs are permitted to establish local preferences and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan and must be based on local housing needs and priorities that can be documented by generally accepted data sources [24 CFR 960.206(a)].

Authority Policy

The Authority will use the following local preferences:

The Authority will offer a preference to families that include victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking who has either been referred by a partnering service agency or consortia or who is seeking an emergency transfer under VAWA from the Authority's housing choice voucher program or other covered housing program operated by the Authority.

The Authority will work with the local partnering service agencies.

Attachment 1: Applications, Waiting List and Tenant Selection

The applicant must certify that the abuser will not reside with the applicant unless the Authority gives prior written approval.

Income Targeting Requirement [24 CFR 960.202(b)]

HUD requires that extremely low-income (ELI) families make up at least 40 percent of the families admitted to public housing during the Authority's fiscal year. ELI families are those with annual incomes at or below the federal poverty level or 30 percent of the area median income, whichever number is higher [*Federal Register* notice 6/25/14]. To ensure this requirement is met, the Authority may skip non-ELI families on the waiting list in order to select an ELI family.

If a PHA also operates a housing choice voucher (HCV) program, admissions of extremely low-income families to the PHA's HCV program during a PHA fiscal year that exceed the 75 percent minimum target requirement for the voucher program, shall be credited against the PHA's basic targeting requirement in the public housing program for the same fiscal year. However, under these circumstances the fiscal year credit to the public housing program must not exceed the lower of: (1) ten percent of public housing waiting list admissions during the PHA fiscal year; (2) ten percent of waiting list admissions to the PHA's housing choice voucher program during the PHA fiscal year; or (3) the number of qualifying low-income families who commence occupancy during the fiscal year of PHA public housing units located in census tracts with a poverty rate of 30 percent or more. For this purpose, qualifying low-income family means a low-income family other than an extremely low-income family.

Authority Policy

The Authority will monitor progress in meeting the ELI requirement throughout the fiscal year. ELI families will be selected ahead of other eligible families on an as-needed basis to ensure that the income targeting requirement is met.

Mixed Population Developments [24 CFR 960.407]

A mixed population development is a public housing development or portion of a development that was reserved for elderly families and disabled families at its inception (and has retained that character) or the PHA at some point after its inception obtained HUD approval to give preference in tenant selection for all units in the development (or portion of a development) to elderly and disabled families [24 CFR 960.102]. Elderly family means a family whose head, spouse, cohead, or sole member is a person who is at least 62 years of age. Disabled family means a family whose head, spouse, cohead, or sole member is a person with disabilities [24 CFR 5.403]. The PHA must give elderly and disabled families equal preference in selecting these families for admission to mixed population developments. The PHA may not establish a limit on the number of elderly or disabled families that may occupy a mixed population development. In selecting elderly and disabled families to fill these units, the PHA must first offer the units that have accessibility features for families that include a person with a disability and require the accessibility features of such units. The PHA may not discriminate against elderly or disabled families that include children (Fair Housing Amendments Act of 1988).

Units Designated for Elderly or Disabled Families [24 CFR 945]

The Authority may designate projects or portions of a public housing project specifically for elderly or disabled families. The Authority must have a HUD-approved allocation plan before the designation may take place.

Attachment 1: Applications, Waiting List and Tenant Selection

Among the designated developments, the Authority must also apply any preferences that it has established. If there are not enough elderly families to occupy the units in a designated elderly development, the Authority may allow near-elderly families to occupy the units [24 CFR 945.303(c)(1)]. Near-elderly family means a family whose head, spouse, or cohead is at least 50 years old, but is less than 62 [24 CFR 5.403].

If there are an insufficient number of elderly families and near-elderly families for the units in a development designated for elderly families, the Authority must make available to all other families any unit that is ready for re-rental and has been vacant for more than 60 consecutive days [24 CFR 945.303(c)(2)].

The decision of any disabled family or elderly family not to occupy or accept occupancy in designated housing shall not have an adverse affect on their admission or continued occupancy in public housing or their position on or placement on the waiting list. However, this protection does not apply to any family who refuses to occupy or accept occupancy in designated housing because of the race, color, religion, sex, disability, familial status, or national origin of the occupants of the designated housing or the surrounding area [24 CFR 945.303(d)(1) and (2)].

This protection does apply to an elderly family or disabled family that declines to accept occupancy, respectively, in a designated project for elderly families or for disabled families, and requests occupancy in a general occupancy project or in a mixed population project [24 CFR 945.303(d)(3)].

Authority Policy

The Authority does not have designated elderly or designated disabled housing at this time.

Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2]

The Authority's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects.

The Authority's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

Steps for Implementation [24 CFR 903.2(c)(1)]

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, the Authority must comply with the following steps:

Step 1. The Authority must determine the average income of all families residing in all the Authority's covered developments. The Authority may use the median income, instead of

Attachment 1: Applications, Waiting List and Tenant Selection

average income, provided that the Authority includes a written explanation in its annual plan justifying the use of median income.

Authority Policy

The Authority will determine the average income of all families in all covered developments on an annual basis.

Step 2. The Authority must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, the Authority has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

Authority Policy

The Authority will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

Step 3. The Authority must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low-income family (federal poverty level or 30 percent of median income, whichever number is higher).

Step 4. The Authority with covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.

Step 5. Where the income profile for a covered development is not explained or justified in the annual plan submission, the Authority must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances the Authority's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family to further the goals of deconcentration
- Providing other strategies permitted by statute and determined by the Authority in consultation with the residents and the community through the annual plan process to be responsive to local needs and the Authority's strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under the Authority's deconcentration policy. The Authority must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the Authority's deconcentration policy [24 CFR 903.2(c)(4)].

Attachment 1: Applications, Waiting List and Tenant Selection

If, at annual review, the average incomes at all general occupancy developments are within the EIR, the Authority will be in compliance with the deconcentration requirement, and no further action is required.

Authority Policy

For developments outside the EIR the Authority will take the following actions to provide for deconcentration of poverty and income mixing:

The Authority will use greater flexibility in attracting households with broader ranges of incomes. The Authority will continue to reassess flat rental amounts annually to attract higher income families and will continue to offer the choice of flat rent or income-based rent to residents. Other avenues to attract higher income families being considered are:

- changes in wait list admission preferences
- more aggressive marketing of developments
- ongoing evaluation of Public Housing inventory for capital improvements.

The Authority will also continue reassessing and updating its Community Service and Self-Sufficiency Requirements (CSSR). The updates to the CSSR will offer more guidance, structure, and community service and self-sufficiency opportunities for public housing residents.

The Authority will continue establishing partnerships with other service agencies to offer more supportive services and resources to public housing residents.

Order of Selection [24 CFR 960.206(e)]

The Authority system of preferences may select families either according to the date and time of application or by a random selection process.

Authority Policy

Families will be selected from the waiting list based on selection preference(s) for which they qualify, and in accordance with the Authority's hierarchy of those preferences. Within each preference category, families will be selected in numerical order based on the numbers that were assigned to each application, by lottery, at the time the applications were placed on the waiting list.

When selecting applicants from the waiting list, the Authority will match the characteristics of the available unit (unit size, accessibility features, unit type) to the applicants on the waiting lists. The Authority will offer the unit to the highest-ranking applicant who qualifies for that unit size or type, or that requires the accessibility features.

By matching unit and family characteristics, it is possible that families who are lower on the waiting list may receive an offer of housing ahead of families with a higher placement based on application number and/or higher preference status.

Factors such as deconcentration or income mixing, and income targeting will also be considered in accordance with HUD requirements and Authority policy.

NOTIFICATION OF SELECTION

When the family has been selected from the waiting list, the Authority must notify the family [24 CFR 960.208].

Authority Policy

Families selected from the waiting list are required to complete an intake application process. An electronic version of the intake paperwork replaces the need for an in-person interview. However, if an applicant is unable to complete the electronic application, or requests an in-person interview, the Authority will schedule an appointment.

The Authority will notify the family by email and first-class mail when it is selected from the waiting list. The notice will inform the family of their selection from the waiting list and will provide instructions for completing the intake process. A copy of the electronic intake paperwork will be sent to the applicant's email address for completion. Authority staff will be available to assist applicants with the intake paperwork via phone, email, or in-person appointment. Required verification documents will be requested, and applicants will sign all required intake forms electronically, if possible.

All adult household members will be required to supply required documentation, and to electronically sign all required intake forms. If an in-person interview is scheduled, all adult family members are required to attend.

If a notification letter is returned to the Authority with no forwarding address, the family will be removed from the waiting list without further notice. Such failure to act on the part of the applicant prevents the Authority from making an eligibility determination; therefore, no informal hearing will be offered.

THE APPLICATION INTERVIEW

HUD recommends that the Authority obtain the information and documentation needed to make an eligibility determination through a private interview. Being invited to attend an interview does not constitute admission to the program.

Assistance cannot be provided to the family until all SSN documentation requirements are met. However, if the Authority determines that an applicant family is otherwise eligible to participate in the program, the family may retain its place on the waiting list for a period determined by the Authority [Notice PIH 2018-24].

Reasonable accommodation must be made for persons with disabilities who are unable to attend an interview due to their disability [24 CFR 8.4(a) and 24 CFR 100.204(a)].

Authority Policy

Pending disclosure and documentation of social security cards, the Authority will allow the family to retain its place on the waiting list for 30 days. If not, all household members have disclosed their social security cards at the next time a unit becomes available, the Authority will offer a unit to the next eligible applicant family on the waiting list.

If the family is claiming a waiting list preference, the family must provide documentation to verify their eligibility for a preference (see Chapter 7 of the ACOP). If

Attachment 1: Applications, Waiting List and Tenant Selection

the family is verified as eligible for the preference, the Authority will proceed with the intake application process. If the Authority determines the family is not eligible for the preference, the intake application will not be made available, and the family will be placed back on the waiting list according to the date and time of their application.

The family must provide the information necessary to establish the family's eligibility, including suitability, and to determine the appropriate amount of rent the family will pay. The family must also complete required forms, provide required signatures, and submit required documentation. If any materials are missing, the Authority will send an email providing the family with a written list of items that must be submitted.

Any required documents or information that the family is unable to provide in the initial intake application must be provided within 5 business days of the interview (Chapter 7 of the ACOP provides details about longer submission deadlines for particular items, including documentation of Social Security numbers and eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial.

An advocate, interpreter, or other assistant may assist the family with the intake application process.

Interviews will be conducted in English. For limited English proficient (LEP) applicants, the Authority will provide translation services in accordance with the Authority's LEP plan.

FINAL ELIGIBILITY DETERMINATION [24 CFR 960.208]

The Authority must verify all information provided by the family. Based on verified information related to the eligibility requirements, including suitability standards, the Authority must make a final determination of eligibility.

When a determination is made that a family is eligible and satisfies all requirements for admission, including tenant selection criteria, the applicant must be notified of the approximate date of occupancy insofar as that date can be reasonably determined [24 CFR 960.208(b)].

Authority Policy

The Authority will notify a family in writing of their eligibility via email within 15 business days of the determination and will provide the approximate date of occupancy insofar as that date can be reasonably determined.

The Authority will expedite the administrative process for determining eligibility to the extent possible for applicants who are admitted to the public housing program because of an emergency transfer from another Authority program.

The Authority must promptly notify any family determined to be ineligible for admission of the basis for such determination, and must provide the applicant upon request, within a reasonable time after the determination is made, with an opportunity for an informal hearing on such determination [24 CFR 960.208(a)].

Attachment 1: Applications, Waiting List and Tenant Selection

Authority Policy

If the Authority determines that the family is ineligible, the Authority will send written notification via email of the ineligibility determination within 15 business days of the determination. The notice will specify the reasons for ineligibility and will inform the family of its right to request an informal hearing.

If the Authority uses a criminal record or sex offender registration information obtained under 24 CFR 5, Subpart J, as the basis of a denial, a copy of the record must precede the notice to deny, with an opportunity for the applicant to dispute the accuracy and relevance of the information before the Authority can move to deny the application. See Section 3-III.G for the Authority's policy regarding such circumstances.

The Authority must provide the family a notice of VAWA rights (form HUD-5380) as well as the HUD VAWA self-certification form (form HUD-5382) in accordance with the Violence against Women Act, and as outlined in 16-VII.C, at the time the applicant is provided assistance or at the time the applicant is denied assistance. This notice must be provided in both of the following instances: (1) when a family actually begins receiving assistance (lease execution); or (2) when a family is notified of its ineligibility.

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 National Standards for the Physical Inspection of Real Estate (NSPIRE).

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

Attachment 2: Operation and Management

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 2: 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.

GRIEVANCE PROCEDURES FOR PUBLIC HOUSING RESIDENTS

REQUIREMENTS

The Authority must have a grievance procedure in place through which residents of public housing are provided an opportunity to grieve any Authority action or failure to act involving the lease or Authority policies which adversely affect their rights, duties, welfare, or status. The Authority must not only meet the minimal procedural due process requirements provided under the regulations but must also meet any additional requirements imposed by local, state, or federal law.

The Authority grievance procedure must be included in, or incorporated by reference in, the lease.

Authority Policy

The Authority grievance procedure will be incorporated by reference in the tenant lease.

The Authority must provide at least 30 days' notice to tenants and resident organizations setting forth proposed changes in the Authority's grievance procedure and provide an opportunity to present written comments. Comments submitted must be considered by the Authority before adoption of any changes to the grievance procedure by the Authority.

Authority Policy

Residents and resident organizations will have thirty calendar days from the date they are notified by the Authority of any proposed changes in the Authority's grievance procedure, to submit written comments to the Authority.

The Authority must furnish a copy of the grievance procedure to each tenant and to resident organizations.

DEFINITIONS

There are several terms used by HUD regarding public housing grievance procedures, which take on specific meanings different from their common usage. These terms are as follows:

- **Grievance** - any dispute which a tenant may have with respect to Authority action or failure to act in accordance with the individual tenant's lease or Authority regulations which adversely affect the individual tenant's rights, duties, welfare or status
- **Complainant** - any tenant whose grievance is presented to the Authority or at the project management office
- **Due Process Determination** - a determination by HUD that law of the jurisdiction requires that the tenant must be given the opportunity for a hearing in court which provides the basic elements of due process before eviction from the dwelling unit
- **Expedited Grievance** - a procedure established by the Authority for any grievance or termination that involves:
 - Any criminal activity that threatens the health, safety, or right to peaceful enjoyment or the Authority's public housing premises by other residents or employees of the Authority; or

Attachment 3: Grievance Procedures

- Any drug-related criminal activity on or off the premises
- **Elements of Due Process** - an eviction action or a termination of tenancy in a state or local court in which the following procedural safeguards are required:
 - Adequate notice to the tenant of the grounds for terminating the tenancy and for eviction
 - Right of the tenant to be represented by counsel
 - Opportunity for the tenant to refute the evidence presented by the Authority including the right to confront and cross-examine witnesses and to present any affirmative legal or equitable defense which the tenant may have
 - A decision on the merits
- **Hearing Officer** - an impartial person selected by the Authority, other than the person who made or approved the decision under review, or a subordinate of that person. The individual or individuals do not need legal training.
- **Tenant** - the adult person (or persons) (other than a live-in aide)
 - Who resides in the unit, and who executed the lease with the Authority as lessee of the dwelling unit, or, if no such person now resides in the unit,
 - Who resides in the unit, and who is the remaining head of household of the tenant family residing in the dwelling unit
- **Resident Organization** - includes a resident management corporation

APPLICABILITY

Grievances could potentially address most aspects of the Authority's operation. However, there are some situations for which the grievance procedure is not applicable.

The grievance procedure is applicable only to individual tenant issues relating to the Authority. It is not applicable to disputes between tenants not involving the Authority. Class grievances are not subject to the grievance procedure and the grievance procedure is not to be used as a forum for initiating or negotiating policy changes of the Authority.

If HUD has issued a due process determination, a Public Housing Agency (PHA) may exclude from its grievance procedure any grievance concerning a termination of tenancy or eviction that involves:

- Any criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises of other residents or employees of the PHA
- Any violent or drug-related criminal activity on or off such premises
- Any criminal activity that resulted in felony conviction of a household member

In states without due process determinations, PHAs must grant opportunity for grievance hearings for all lease terminations, regardless of cause, with the following exception: PHAs may use expedited grievance procedures for the excluded categories listed above. These expedited grievance procedures are described in Section 14-III.E. below.

Attachment 3: Grievance Procedures

If HUD has issued a due process determination, the PHA may evict through the state/local judicial eviction procedures. In this case, the PHA is not required to provide the opportunity for a hearing under the PHA's grievance procedure as described above.

Authority Policy

The Authority is in a HUD-declared due process state. Therefore, the Authority will not offer grievance hearings for lease terminations involving criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other residents or employees of the Authority, for violent or drug-related criminal activity on or off the premises, or for any criminal activity that resulted in felony conviction of a household member.

See Chapter 13 of the ACOP for related policies on the content of termination notices.

INFORMAL SETTLEMENT OF GRIEVANCE [24 CFR 966.54]

HUD regulations state that any grievance must be personally presented, either orally or in writing, to the Authority office or to the office of the housing development in which the complainant resides so that the grievance may be discussed informally and settled without a hearing.

Authority Policy

The Authority will accept requests for an informal settlement of a grievance either orally or in writing (including emailed requests), to the Authority office within ten business days of the grievable event. Within ten business days of receipt of the request the Authority will arrange a meeting with the tenant at a mutually agreeable time and confirm such a meeting in writing to the tenant. The informal settlement may be conducted remotely as required by the Authority or may be conducted remotely upon consideration of the request of the tenant. See 14-III.G for information on how and under what circumstances remote informal settlements may be conducted.

If a tenant fails to attend the scheduled meeting without prior notice, the Authority will reschedule the appointment only if the tenant can show good cause for failing to appear, or if it is needed as a reasonable accommodation for a person with disabilities.

Good cause is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family.

HUD regulations require that a summary of such discussion be prepared within a reasonable time and one copy will be given to the tenant and one retained in the Authority's tenant file.

The summary must specify the names of the participants, dates of meeting, the nature of the proposed disposition of the complaint and the specific reasons therefore and will specify the procedures by which a hearing may be obtained if the complainant is not satisfied.

Authority Policy

The Authority will prepare a summary of the informal settlement within five business days; one copy to be given to the tenant and one copy to be retained in the Authority's tenant file.

Attachment 3: Grievance Procedures
PROCEDURES TO OBTAIN A HEARING

Requests for Hearing and Failure to Request

Authority Policy

The resident must submit a written request (including emailed requests) for a grievance hearing to the Authority within five business days of the tenant's receipt of the summary of the informal settlement.

If the complainant does not request a hearing, the Authority's disposition of the grievance under the informal settlement process will become final. However, failure to request a hearing does not constitute a waiver by the complainant of the right to contest the Authority's action in disposing of the complaint in an appropriate judicial proceeding.

Scheduling of Hearings

If the complainant has complied with all requirements for requesting a hearing as described above, a hearing must be scheduled by the hearing officer promptly for a time and place reasonably convenient to both the complainant and the Authority. A written notification specifying the time, place and the procedures governing the hearing must be delivered to the complainant and the appropriate Authority official.

Authority Policy

Within ten business days of receiving a written request for a hearing, the hearing officer will schedule and send written notice of the hearing to both the complainant and the Authority.

The hearing will be conducted remotely, and at the time the notice is sent to the family, the family will be notified:

Regarding the processes involved in a remote grievance hearing

That the Authority will provide technical assistance prior to and during the hearing, if needed

That if the family or any individual witness has any technological, resource, or accessibility barriers, the family may inform the Authority and the Authority will assist the family in either resolving the issue or allow the family to participate in an in-person hearing, as appropriate

The Authority may wish to permit the tenant to request to reschedule a hearing for good cause.

Authority Policy

The tenant may request to reschedule a hearing for good cause, or if it is needed as a reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family. Requests to reschedule a hearing must be made orally or in writing prior to the hearing date. At its discretion, the Authority may request documentation of the "good cause" prior to rescheduling the hearing.

Attachment 3: Grievance Procedures
Expedited Grievance Procedure

The Authority may establish an expedited grievance procedure for any grievance concerning a termination of tenancy or eviction that involves:

- Any criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents or employees of the Authority
- Any drug-related criminal activity on or near such premises
- Any criminal activity that resulted in felony conviction of a household member

In such expedited grievances, the informal settlement of grievances as discussed in 14-III.D is not applicable.

The Authority may adopt special procedures concerning expedited hearings, including provisions for expedited notice or scheduling, or provisions for expedited decision on the grievance.

Authority Policy

The Authority will not offer expedited grievance procedures.

SELECTION OF HEARING OFFICER [24 CFR 966.53(e)]

The grievance hearing must be conducted by an impartial person or persons appointed by the Authority, other than the person who made or approved the Authority action under review, or a subordinate of such person. The Authority must describe their policies for selection of a hearing officer in their lease.

Authority Policy

Authority grievance hearings will be conducted by a single hearing officer and not a panel.

The Authority will appoint a staff member who was not involved in the decision under appeal. If a designated staff member (such as the program manager) was involved in the decision, or is a subordinate of such person, an alternate hearing officer will be selected.

The Authority may select designated staff members who were not involved in the decision under appeal in certain circumstances, such as appeals involving discrimination claims or denials of requests for reasonable accommodations.

PHAs must describe their policies for selection of a hearing officer in their lease forms. Changes to the public housing lease are subject to a 30-day comment period [24 CFR 966.4].

REMOTE HEARINGS [Notice PIH 2020-32]

There is no requirement that grievance hearings be conducted in-person, and as such, HUD allows PHAs to conduct all or a portion of their grievance hearings remotely either over the phone, via video conferencing, or through other virtual platforms. If the PHA chooses to conduct remote grievance hearings, applicants may still request an in-person hearing, as applicable.

Attachment 3: Grievance Procedures

Authority Policy

The Authority has the sole discretion to require that hearings be conducted remotely in case of local, state, or national physical distancing orders, and in cases of inclement weather or natural disaster.

The Authority will conduct all informal hearings remotely, unless upon request of the applicant as a reasonable accommodation, an applicant requires an in-person informal hearing. The Authority will consider other reasonable requests for an in-person informal hearing on a case-by-case basis.

Discovery of Documents Before the Remote Hearing

Authority Policy

If the hearing will be conducted remotely, the Authority will compile a hearing packet, consisting of all documents the Authority intends to produce at the hearing. The Authority will mail copies of the hearing packet to the tenant, the tenant's representatives, if any, and the hearing officer at least three days before the scheduled remote hearing. The original hearing packet will be in the possession of the Authority representative and retained by the Authority.

If the hearing is to be conducted remotely, the Authority will require the resident to provide any documents directly relevant to the hearing at least 24 hours before the scheduled hearing through the mail, via email, or text. The Authority will scan and email copies of these documents to the hearing officer and the Authority representative the same day they are received.

Documents will be shared electronically whenever possible.

Ensuring Accessibility for Persons with Disabilities and LEP Individuals

As with in-person grievance hearings, the platform for conducting remote grievance hearings must be accessible to persons with disabilities and the grievance hearings must be conducted in accordance with Section 504 and accessibility requirements. This includes ensuring any information, websites, emails, digital notifications, and other virtual platforms are accessible for persons with vision, hearing, and other disabilities. Further, providing effective communication in a digital context may require the use of individualized auxiliary aids or services, such as audio description, captioning, sign language and other types of interpreters, keyboard accessibility, accessible documents, screen reader support, and transcripts. Auxiliary aids or services must be provided in accessible formats, in a timely manner, and in such a way to protect the privacy and independence of the individual. The Authority may never request or require that individuals with disabilities provide their own auxiliary aids or services, including for remote grievance hearings.

If no method of conducting a remote grievance hearing is available that appropriately accommodates an individual's disability, the Authority may not hold against the individual his or her inability to participate in the remote grievance hearing, and the Authority should consider whether postponing the remote hearing to a later date is appropriate or whether there is a suitable alternative.

Due to the individualized nature of disability, the appropriate auxiliary aid or service necessary, or reasonable accommodation will depend on the specific circumstances and requirements.

Attachment 3: Grievance Procedures

As with in-person reviews, Limited English Proficiency (LEP) requirements also apply to remote grievance hearings, including the use of interpretation services and document translation. See Chapter 2 of the ACOP for a more thorough discussion of accessibility and LEP requirements, all of which apply in the context of remote grievance hearings.

Conducting Hearings Remotely

The Authority must ensure that the lack of technology or inability to use technology for remote grievance hearings does not pose a disadvantage to families that may not be apparent to the Authority. The Authority should determine through a survey or other means if these barriers exist prior to conducting the remote grievance hearing and, if the family does not have the proper technology to fully participate, either postpone the hearing or provide an alternative means of access.

As with in-person grievance hearings, the Authority must provide all materials presented, whether paper or electronic, to the family prior to the remote grievance hearing. The family must also be provided with an accessible means by which to transmit their own evidence.

The Authority's essential responsibility is to ensure grievance hearings meet the requirements of due process and comply with HUD regulations. Therefore, all Authority policies and processes for remote grievance hearings will be conducted in accordance with due process requirements and will be in compliance with HUD regulations at 24 CFR 966.56 and the guidance for conducting remote hearings specified in Notice PIH 2020-32.

Authority Policy

The Authority will conduct remote grievance hearings via a video conferencing platform, when available. If, after attempting to resolve any barriers, participants are unable to adequately access the video conferencing platform at any point, or upon request, the grievance hearing will be conducted by telephone conferencing call-in. If the family is unable to adequately access the telephone conferencing call-in at any point, the remote grievance hearing will be postponed, and an in-person alternative will be provided promptly within a reasonable time.

At least five business days prior to scheduling the remote hearing, the Authority and Hearing Officer will provide the family with login information and/or conferencing call-in information and an electronic copy of all materials being presented via first class mail and/or email. The notice will advise the family of technological requirements for the hearing and request the family notify the Authority of any known barriers. The Authority will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the opportunity to attend an in-person hearing.

The Authority will follow up with a phone call and/or email to the family at least one business day prior to the remote grievance hearing to ensure that the family received all information and is comfortable accessing the video conferencing or call-in platform.

The Authority will ensure that all electronic information stored or transmitted with respect to the grievance hearing is secure, including protecting personally identifiable information (PII), and meets the requirements for accessibility for persons with disabilities and persons with LEP.

Attachment 3: Grievance Procedures
PROCEDURES GOVERNING THE HEARING [24 CFR 966.56]

Rights of Complainant

The complainant will be afforded a fair hearing. This includes:

- The opportunity to examine before the grievance hearing any Authority documents, including records and regulations that are directly relevant to the hearing. The tenant must be allowed to copy any such document at the tenant's expense. If the Authority does not make the document available for examination upon request by the complainant, the Authority may not rely on such document at the grievance hearing.

Authority Policy

The tenant will be allowed to copy any documents related to the hearing at no cost to the family. There will be no charge for documents emailed by the Authority. The family must request discovery of Authority documents no later than 12:00 p.m. on the business day prior to the hearing.

If the tenant needs to make copies of documents on-site, the Authority staff will schedule an appointment. Authority staff will be present at the time the tenant makes necessary copies of documentation to ensure there are no violations of privacy regarding tenant files.

- The right to be represented by counsel or another person chosen to represent the tenant, and to have such person make statements on the tenant's behalf.

Authority Policy

Hearings may be attended by the following applicable persons:

The Authority representatives and any witnesses for the Authority

The tenant and any witnesses for the tenant

The tenant's counsel or other representative

Any other person approved by the Authority as a reasonable accommodation for a person with a disability

- The right to a private hearing unless the complainant requests a public hearing.
- The right to present evidence and arguments in support of the tenant's complaint, to controvert evidence relied on by the Authority or project management, and to confront and cross-examine all witnesses upon whose testimony or information the Authority or project management relies.
- A decision based solely and exclusively upon the facts presented at the hearing.

Failure to Appear

If the complainant or the Authority fails to appear at a scheduled hearing, the hearing officer may decide to postpone the hearing for no more than five business days or may decide that the party has waived his/her right to a hearing. Both the complainant and the Authority must be notified of the determination by the hearing officer: Provided, that a determination that the complainant has waived his/her right to a hearing will not constitute a waiver of any right the complainant may have to contest the Authority's disposition of the grievance in an appropriate judicial proceeding.

Attachment 3: Grievance Procedures

There may be times when a complainant does not appear due to unforeseen circumstances which are out of their control and are no fault of their own.

Authority Policy

If the tenant does not appear at the scheduled time of the hearing, the hearing officer will wait up to 15 minutes. If the tenant appears within 15 minutes of the scheduled time, the hearing will be held. If the tenant does not arrive within 15 minutes of the scheduled time, they will be considered to have failed to appear.

If the tenant fails to appear and was unable to reschedule the hearing in advance, the tenant must contact the Authority within 24 hours of the scheduled hearing date, excluding weekends and holidays. The hearing officer will reschedule the hearing only if the tenant can show good cause for the failure to appear, or it is needed as a reasonable accommodation for a person with disabilities.

"Good cause" is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family.

General Procedures

At the hearing, the complainant must first make a showing of an entitlement to the relief sought and thereafter the Authority must sustain the burden of justifying the Authority action or failure to act against which the complaint is directed [24 CFR 966.56(d)].

The hearing is conducted informally by the hearing officer. The Authority and the tenant must be given the opportunity to present oral or documentary evidence pertinent to the facts and issues raised by the complaint, and to question any witnesses.

Authority Policy

Any evidence to be considered by the hearing officer must be presented at the time of the hearing. There are four categories of evidence.

Oral evidence: the testimony of witnesses

Documentary evidence: a writing which is relevant to the case, for example, a letter written to the Authority. Writings include all forms of recorded communication or representation, including letters, emails, words, pictures, sounds, videotapes, symbols, or combinations thereof.

Demonstrative evidence: Evidence created specifically for the hearing and presented as an illustrative aid to assist the hearing officer, such as a model, a chart or other diagram.

Real evidence: A tangible item relating directly to the case.

Hearsay Evidence is evidence based not on a witness' personal knowledge. In and of itself, hearsay evidence carries no weight when making a finding of fact. The hearing officer may include hearsay evidence when considering their decision if it is corroborated by other evidence. Even though hearsay evidence is generally admissible in a hearing, the hearing officer will not base a hearing decision on hearsay alone unless there is clear probative value and credibility of the evidence, and the party seeking the change has met the burden of proof.

Attachment 3: Grievance Procedures

If the Authority fails to comply with the discovery requirements (providing the tenant with the opportunity to examine Authority documents prior to the grievance hearing), the hearing officer will refuse to admit such evidence.

Other than the failure of the Authority to comply with discovery requirements, the hearing officer has the authority to overrule any objections to evidence.

The complainant or the Authority may arrange, in advance and at the expense of the party making the arrangement, for a transcript of the hearing. Any interested party may purchase a copy of such transcript [24 CFR 966.56(e)].

Authority Policy

If the complainant would like the Authority to record the proceedings by audiotape, the request must be made to the Authority by 12:00 p.m. on the business day prior to the hearing.

The Authority will consider that an audio tape recording of the proceedings is a transcript.

Accommodations of Persons with Disabilities

The Authority must provide reasonable accommodation for persons with disabilities to participate in the hearing. Reasonable accommodation may include qualified sign language interpreters, readers, accessible locations, or attendants.

If the tenant is visually impaired, any notice to the tenant which is required in the grievance process must be in an accessible format.

See Chapter 2 of the ACOP for a thorough discussion of the Authority's responsibilities pertaining to reasonable accommodation.

Limited English Proficiency

The Authority must comply with HUD's LEP Final Rule in providing language services throughout the grievance process.

DECISION OF THE HEARING OFFICER

The hearing officer must issue a written decision, stating the reasons for the decision, within a reasonable time after the hearing. Factual determinations relating to the individual circumstances of the family must be based on a preponderance of evidence presented at the hearing. A copy of the decision must be sent to the complainant and the Authority. The Authority must retain a copy of the decision in the tenant's folder. A log of all hearing officer decisions must also be maintained by the Authority and made available for inspection by a prospective complainant, his/her representative, or the hearing officer [24 CFR 966.57(a)].

Authority Policy

In rendering a decision, the hearing officer will consider the following matters:

Authority Notice to the Family: The hearing officer will determine if the reasons for the Authority's decision are factually stated in the notice.

Discovery: The hearing officer will determine if the family was given the opportunity to examine any relevant documents in accordance with Authority policy.

Attachment 3: Grievance Procedures

Authority Evidence to Support the Authority Decision: The evidence consists of the facts presented. Evidence is not conclusion, and it is not argument. The hearing officer will evaluate the facts to determine if they support the Authority's conclusion.

Validity of Grounds for Termination of Tenancy (when applicable): The hearing officer will determine if the termination of tenancy is for one of the grounds specified in the HUD regulations and Authority policies. If the grounds for termination are not specified in the regulations or in compliance with Authority policies, then the decision of the Authority will be overturned.

The hearing officer will issue a written decision to the family and the Authority no later than ten business days after the hearing. The report will contain the following information:

Hearing information:

- Name of the complainant
- Date, time, and place of the hearing
- Name of the hearing officer
- Name of the Authority representatives
- Name of family representative (if any)
- Names of witnesses (if any)

Background: A brief, impartial statement of the reason for the hearing and the date(s) on which the informal settlement was held, who held it, and a summary of the results of the informal settlement. Also includes the date the complainant requested the grievance hearing.

Summary of the Evidence: The hearing officer will summarize the testimony of each witness and identify any documents that a witness produced in support of his/her testimony and that are admitted into evidence.

Findings of Fact: The hearing officer will include all findings of fact, based on a preponderance of the evidence. *Preponderance of the evidence* is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not. Preponderance of the evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

Conclusions: The hearing officer will render a conclusion derived from the facts that were found to be true by a preponderance of the evidence. The conclusion will result in a determination of whether these facts uphold the Authority's decision.

Order: The hearing report will include a statement of whether the Authority's decision is upheld or overturned. If it is overturned, the hearing officer will instruct the Authority to change the decision in accordance with the hearing officer's determination. In the case of termination of tenancy, the hearing officer will instruct the Authority to restore the family's status.

Attachment 3: Grievance Procedures Procedures for Further Hearing

Authority Policy

The hearing officer may ask the family for additional information and/or might adjourn the hearing to reschedule it at a later date, before reaching a decision. If the family misses an appointment or deadline ordered by the hearing officer, the action of the Authority will take effect and another hearing will not be granted.

Final Decision

The decision of the hearing officer is binding on the Authority which must take the action, or refrain from taking the action cited in the decision unless the Authority's Board of Commissioners determines within a reasonable time, and notifies the complainant that:

- The grievance does not concern Authority action or failure to act in accordance with or involving the complainant's lease on Authority policies which adversely affect the complainant's rights, duties, welfare, or status; or
- The decision of the hearing officer is contrary to federal, state, or local law, HUD regulations or requirements of the annual contributions contract between HUD and the Authority

Authority Policy

When the Authority considers the decision of the hearing officer to be invalid due to the reasons stated above, it will present the matter to the Authority Board of Commissioners within ten business days of the date of the hearing officer's decision. The Board has thirty calendar days to consider the decision. If the Board decides to reverse the hearing officer's decision, it must notify the complainant within ten business days of this decision.

A decision by the hearing officer or Board of Commissioners in favor of the Authority or which denies the relief requested by the complainant in whole or in part must not constitute a waiver of any rights, nor effect in any manner whatever, any rights the complainant may have to a subsequent trial or judicial review in court [24 CFR 966.57(c)].

PRIORITY PARTNERSHIP FRAMEWORK

OVERVIEW

In addition to running the Family Self-Sufficiency (FSS) program for Housing Choice Voucher (HCV) recipients, the Authority has expanded that model to extend supportive services to all its residents. The Priority Partnership Framework is largely based on the FSS model of partnering with community organizations in order to provide services to increase residents' ability to build and maintain self-sufficiency. This model prioritizes the establishment of services in levels, beginning with the most critical: emergency housing and crisis support. Once the team has established relationships with organizations in this level, staff will pursue agreements with childcare and family support, workforce development and job training, and education and financial literacy organizations. These partnerships are being formalized through Memorandum of Understanding (MOUs) with community partners.

Priority Partnership Framework

Housing Authority of St. Louis County



Level 1 Services:

- Crisis support
- Domestic violence support
- Emergency housing
- Energy and utility assistance
- Food resources
- Legal services
- Mental health support
- Natural disaster assistance
- Physical health support
- Security deposit assistance

Level 2 Services:

- Broadband services
- Daycare
- Holiday support
- Newborn and post-partum support
- Parenting training and support
- Transportation

Level 3 Services:

- Assisting youth with career skills
- Connecting job seekers to training programs
- Job training
- Scholarship programs

Level 4 Services:

- Debt counseling
- Financial literacy and planning
- Homeownership education
- Tenants' rights training

Level 5 Services:

- Home repair services
- Senior and disability services
- Wealth-building training

COMMUNITY SERVICE AND SELF-SUFFICIENCY POLICY

Background

The Quality Housing and Work Responsibility Act of 1998 requires that all non-exempt (see definitions) public housing adult residents (18 or older) contribute eight (8) hours per month of community service (volunteer work) or participate in eight (8) hours of training, counseling, classes, or other activities that help an individual toward self-sufficiency and economic independence. This is a requirement of the public housing lease.

Definitions

Community Service - community service activities include, but are not limited to, work at:

- Local public or nonprofit institutions such as schools, head start programs, before or after school programs, childcare centers, hospitals, clinics, hospices, nursing homes, recreation centers, senior centers, adult day care programs, homeless shelters, feeding programs, food banks (distributing either donated or commodity foods), or clothes closets (distributing donated clothing)
- Nonprofit organizations serving Authority residents or their children such as: Boy or Girl Scouts, Boys or Girls Club, 4-H clubs, Police Assistance League (PAL), organized children's recreation, mentoring or education programs, Big Brothers or Big Sisters, garden centers, community clean-up programs, beautification programs
- Programs funded under the Older Americans Act, such as Green Thumb, Service Corps of Retired Executives, senior meals programs, senior centers, Meals on Wheels
- Public or nonprofit organizations dedicated to seniors, youth, children, residents, citizens, special-needs populations or with missions to enhance the environment, historic resources, cultural identities, neighborhoods, or performing arts
- Authority housing to improve grounds or provide gardens (so long as such work does not alter the Authority's insurance coverage); or work through resident organizations to help other residents with problems, including serving on the Resident Advisory Board
- Care for the children of other residents so parent may volunteer

Note: Political activity is excluded.

Self-Sufficiency Activities - self-sufficiency activities include, but are not limited to:

- Job readiness or job training
- Training programs through local one-stop career centers, workforce investment boards (local entities administered through the U.S. Department of Labor), or other training providers
- Employment counseling, work placement, or basic skills training
- Education, including higher education (junior college or college), or reading, financial, or computer literacy classes
- Apprenticeships (formal or informal)

Attachment 5: Community Service and Self-Sufficiency Policy

- English proficiency or English as a second language classes
- Budgeting and credit counseling
- Any other program necessary to ready a participant to work (such as substance abuse or mental health counseling)

Exempt Adult - an adult member of the family who meets any of the following criteria:

- Is 62 years of age or older
- Is blind or a person with disabilities (as defined under section 216[i][I] or 1614 of the Social Security Act), and who certifies that because of this disability he or she is unable to comply with the service provisions, or is the primary caretaker of such an individual
- Is engaged in *work activities*
- Is able to meet requirements under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of Missouri, including a state-administered welfare-to-work program; or
- Is a member of a family receiving assistance, benefits, or services under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of Missouri, including a state-administered welfare-to-work program and the supplemental nutrition assistance program (SNAP), and has not been found by the state or other administering entity to be in non-compliance with such program

Public Housing Agencies (PHA) can use reasonable guidelines in clarifying the work activities in coordination with TANF, as appropriate.

Work Activities mean it relates to an exemption from the community service requirement, *work activities* means:

- Unsubsidized employment
- Subsidized private sector employment
- Subsidized public sector employment
- Work experience (including work associated with the refurbishing of publicly assisted housing) if sufficient private sector employment is not available
- On-the-job training
- Job search and job readiness assistance
- Community service programs
- Vocational educational training (not to exceed 12 months with respect to any individual)
- Job skills training directly related to employment
- Education directly related to employment, in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency
- Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence, in the case of a recipient who has not completed secondary school or received such a certificate

Attachment 5: Community Service and Self-Sufficiency Policy

- Provision of childcare services to an individual who is participating in a community service program

Requirements of the Program

1. The eight (8) hours per month may be either volunteer work or self-sufficiency program activity, or a combination of the two.
2. At least eight (8) hours of activity must be performed each month or may be aggregated across a year. Any blocking of hours is acceptable as long as long as 96 hours is completed by each annual certification of compliance.
3. Family obligation:
 - At lease execution, all adult members (18 or older) of a public housing resident family must:
 - Sign a certification that they have received and read this policy and understand that if they are not exempt, failure to comply with the community service requirement will result in a nonrenewal of their lease; and
 - Declare if they are exempt. If exempt, they must complete the Exemption Form and provide documentation of the exemption.
 - Upon written notice from the Authority, non-exempt family members must present complete documentation of activities performed during the applicable lease term. This documentation will include places for signatures of supervisors, instructors, or counselors, certifying the number of hours.
 - If a family member is found to be non-compliant at the end of the 12-month lease term, he or she, and the head of household, will be required to sign an agreement with the housing authority to make up the deficient hours over the next twelve (12) month period, or the lease will be terminated.
 - At annual reexamination, the family must also sign a certification certifying that they understand the community service requirement.
4. Change in exempt status:
 - If, during the twelve (12) month lease period, a non-exempt person becomes exempt, it is his or her responsibility to report this to the Authority and provide documentation of exempt status.
 - If, during the twelve (12) month lease period, an exempt person becomes non-exempt, it is their responsibility to report this to the Authority. Upon receipt of this information the Authority will provide the person with the appropriate documentation form(s) and a list of agencies in the community that provide volunteer and/or training opportunities.

Authority Obligation

1. To the greatest extent possible and practicable, the Authority will:
 - Provide names and contacts at agencies that can provide opportunities for residents, including residents with disabilities, to fulfill their community service obligations.

Attachment 5: Community Service and Self-Sufficiency Policy

- Provide in-house opportunities for volunteer work or self-sufficiency activities.
2. The Authority will provide the family with a copy of this policy, and all applicable exemption verification forms and community service documentation forms, at lease-up, lease renewal, when a family member becomes subject to the community service requirement during the lease term, and at any time upon the family's request.
 3. Although exempt family members will be required to submit documentation to support their exemption, the Authority will verify the exemption status in accordance with its verification policies. The Authority will make the final determination as to whether or not a family member is exempt from the community service requirement. Residents may use the Authority's grievance procedure if they disagree with the Authority's determination.
 4. Non-compliance of family member:
 - At least thirty (30) days prior to the end of the 12-month lease term, the Authority will begin reviewing the exempt or non-exempt status and compliance of family members;
 - If, at the end of the initial 12-month lease term under which a family member is subject to the community service requirement, the Authority finds the family member to be non-compliant, the Authority will not renew the lease unless:
 - The head of household and any other non-compliant resident enter into a written agreement with the Authority, to make up the deficient hours over the next twelve (12) month period; or
 - The family provides written documentation satisfactory to the Authority that the non-compliant family member no longer resides in the unit.
 - If, at the end of the next 12-month lease term, the family member is still not compliant, a 30-day notice to terminate the lease will be issued and the entire family will have to vacate, unless the family provides written documentation satisfactory to the Authority that the non-compliant family member no longer resides in the unit;
 - The family may use the Authority's grievance procedure to dispute the lease termination.