

PALM BEACH COUNTY HOUSING AUTHORITY

Annual Plan

Fiscal Year 2024



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Annual PHA Plan
(Standard PHAs and
Troubled PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

OMB No. 2577-0226
Expires: 03/31/2024

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, 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. 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.

A.	PHA Information.														
A.1	<p>PHA Name: Palm Beach County Housing Authority PHA Code: FL080</p> <p>PHA Type: <input type="checkbox"/> Standard PHA <input checked="" type="checkbox"/> Troubled PHA</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/1/2023</u></p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Public Housing (PH) Units <u>428</u> Number of Housing Choice Vouchers (HCVs) <u>3,172</u> Total Combined Units/Vouchers <u>3,600</u></p> <p>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 in sections B and C 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>PBCHA's proposed Annual Plan and Public Hearing Information can be found at the following locations:</p> <ol style="list-style-type: none">1) Palm Beach County Housing Authority Administrative Office, 3432 West 45th Street, West Palm Beach, FL 334072) Dyson Circle Apartments, 4695 N. Dyson Circle, West Palm Beach, FL 334153) Schall Landings Apartments, 2402 Schall Circle, West Palm Beach, FL 334174) Seminole Estates, 6388 Seminole Circle, Lantana, FL 334625) Drexel House Apartments, 1745 Drexel Road, West Palm Beach, FL 334176) Housing Authority Website: http://www.pbchafl.org7) Resident Advisory Board (RAB) Members received an electronic and/or hard copy of all Draft Plans referenced above. <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table><tr><th rowspan="2">Participating PHAs</th><th rowspan="2">PHA Code</th><th rowspan="2">Program(s) in the Consortia</th><th rowspan="2">Program(s) not in the Consortia</th><th colspan="2">No. of Units in Each Program</th></tr><tr><th>PH</th><th>HCV</th></tr><tr><td>Lead PHA:</td><td></td><td></td><td></td><td></td><td></td></tr></table>	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:					
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:															
B.	Annual Plan Elements														

B.1	<p>Revision of 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 type="checkbox"/> <input checked="" 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 checked="" type="checkbox"/> <input 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>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>For other Capital Grant Programs, we are currently working on a submittal for the Housing Related Hazards & Lead-based Paint Capital Fund Program. Our intent is to identify any moisture related housing hazards that may be present in 100% of our Public Housing Portfolio, remediate any concerns that we may find through testing, house the tenant families through relocation protocol during all remediation, rebuild and</p>

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	<p>retesting. Also, our intent is to further prevent the problem by installing central air conditioning to alleviate additional moisture from entering units, provide increased air quality for families with numerous respiratory issues and test/upgrade electrical service to units to safely operate new equipment. We intend to submit for the Emergency Safety and Security Grant to address increased crime statistics in areas where our communities are located</p> <p>(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.</p>
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p>
B.4	<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>PBCHA CFP-2022 was approved by HUD on February 3, 2023</p>
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Note:</p> <p>(b) If yes, please describe:</p> <p>There were 4 findings in the HCVP program and 1 finding in HOPWA during the fiscal year ending 2021. These findings related to Eligibility, HQS Enforcement, Rent Reasonableness and Selection from the Waiting List covered under OMB Compliance Supplement. There were no findings related to the financial statements, public housing program, or Capital Fund Program. The full audit report providing detailed information regarding the Fiscal Year Audit Findings can be found on the PBCHA's website. The PBCHA applied and was approved for Extension of Certain Regulatory Waivers for the Housing Choice Voucher (including Mainstream) Program and Streamlined Review Process under Notice PIH 2022-30 to waive the application of SEMAP in its entirety due to indicators affected directly or indirectly because of the disruption to PHA operations caused by its adoption of available CARES Act waivers.</p>
C.	<p>Other Document and/or Certification Requirements.</p>
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N</p>

	<p><input checked="" type="checkbox"/> <input type="checkbox"/> Note: Comments and analysis/recommendations will be provided following RAB meeting scheduled for June 15, 2023</p> <p>(c) 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. (See comments on page 58.)</p>
C.2	<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. (See page 63.)</p>
C.3	<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 the 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. (See attachment at page 65)</p>
C.4	<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</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
C.5	<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</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p>Troubled SEMAP score from 2019, carried over by approved request under Notice PIH 2022-30, "Expedited Regulatory Waivers for Public Housing and Housing Choice Voucher (including Mainstream and Mod Rehab) Programs".</p>
D.	<p>Affirmatively Furthering Fair Housing (AFFH).</p>
D.1	<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 this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p>

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

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B.1 Revision of PHA Plan Elements

The following plan elements have been revised by PBCHA:



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Statement of Housing Needs and Strategy for Addressing Housing Needs

Housing Needs of families on the Public Housing Waiting Lists as of April , 2023:

Income Levels		
	# of Families	% of Total Families
Waiting List Total		
Extremely low income (<= 30 % AMI or federal poverty level)		
Very low income (>30% but <=50% AMI)		
Low income (>50% but <80% AMI)		
Families with children		
Elderly families		
Families with Disabilities		
Racial Distribution		
Race/ethnicity (White)		
Race/ethnicity (Black)		
Race/ethnicity (Asian/Pacific Islander/Other)		
Race/ethnicity (Hispanic)		
Race/ethnicity (Non-Hispanic)		
Bedrooms Needed		
1 BR		
2 BR		
3 BR		
4 BR		
5 BR		

Is the waiting list closed (select one)? YES NO

How long has it been closed (# of months)? N/A

Does the PHA plan to reopen the list in the PHA plan year? YES NO
List opened June 6, 2022

Does the PHA permit specific categories of families onto the waiting lists, even if generally closed?
YES NO

Housing Needs (continued)

Housing Needs of Families on the Project Based Waiting Lists as of April, 2023:

Income Levels								
	# Of Families				% Of Families			
	WG	QW	NV	CV	WG	QW	NV	CV
Waiting List Total	-							
Extremely Low Income	-	-						
Very Low Income	-	-						
Low Income	-	-						
Families With Children	-	-						
Elderly	-	-						
Families With Disabilities	-	-						
Race/ethnicity (White)	-	-						
Race/ethnicity (Black)	-	-						
Race (Asian/Pacific Islander/other)	-	-						
Ethnicity Hispanic	-	-						
Ethnicity Non-Hispanic	-	-						
Bedrooms Needed								
1 BR	-	-	-	-				
2 BR	-	-	-	-				
3 BR	-	-	-	-				
4 BR	-	-	-	-				
5 BR	-	-	-	-				
Abbreviation Key: WG: Westgate CV: Covenant Villas NV: New South Bay Villas QW: Quiet Waters								

Is the waiting list closed? (select one) YES ☐ NO ☐ If YES: Remains closed for Covenant Villas and New South Bay Villas. Has been opened for Quiet Waters and Westgate.

How long has it been closed (# of months)? PBCHA maintains site-based waiting list for each PBV community. The information related to each waitlist is as follows:

Covenant Villas - 48 months; Closed 3/15/2018

Quiet Waters - 46 months; Closed 6/21/2018 **UPDATE:** Opened on June 6, 2022

New South Bay Villas - 36 months; Closed 3/22/2019

Westgate – 71 months; Closed 4/18/2016 **UPDATE:** Opened on June 6, 2022

Housing Needs (continued)



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Does the PHA plan to reopen the list in the PHA plan year? ☒ YES ☐ NO

Opened on June 6, 2022 for Quiet Waters and Westgate

Does the PHA permit specific categories of families onto the waiting lists, even if generally closed?

☒ YES ☐ NO

DRAFT

Housing Needs of Families on the Housing Choice Voucher (HCVP) Waiting List as of April 22, 2023:

Income Levels		
	# Of Families	% of Total Families
Waiting List Total	14378	100
Extremely low income (<= 30 % AMI or federal poverty level)		
Very low income (>30% but <=50% AMI)		
Low income (>50% but <80% AMI)		
Families with children	7318	50.9%
Elderly families	1511	10.5%
Families with Disabilities	2689	18.7%
Racial Distribution		
Race/ethnicity (White)	3222	22.4%
Race/ethnicity (Black)	11313	78.7%
Race/ethnicity (Asian/Pacific Islander/Other)	596	4.2%
Race/ethnicity (Hispanic)	2549	17.7%
Race/ethnicity (Non - Hispanic)		
Bedrooms Needed		
1 BR	-	-
2 BR	-	-
3 BR	-	-
4 BR	-	-
5 BR	-	-

Is the waiting list closed? (select one) YES ☐ NO ☒ If YES:

How long has it been closed (# of months)? 4 months

Does the PHA plan to reopen the list in the PHA plan year? ☐ YES ☒ NO

Does the PHA permit specific categories of families onto the waiting lists, even if generally closed?

☒ YES ☐ NO

Housing Needs (continued)

Housing Needs of Families on the Housing Opportunities for People With AIDS (HOPWA) as of , 2023:

Income Levels		
	# Of Families	% of Total Families
Waiting List Total		
Extremely low income (<= 30 % AMI or federal poverty level)		
Very low income (>30% but <=50% AMI)		
Low income (>50% but <80% AMI)		
Families with children		
Elderly families		
Families with Disabilities		
Race/ethnicity (White)		
Race/ethnicity (Black)		
Race/ethnicity (Asian/Pacific Islander/Other)		
Race/ethnicity (Hispanic)		
Race/ethnicity (Non - Hispanic)		
Bedrooms Needed		
1 BR	-	-
2 BR	-	-
3 BR	-	=
4 BR	-	-
5 BR	-	-

Is the waiting list closed? (select one) YES ☒ NO ☐ If YES:

How long has it been closed (# of months)? 72 months (closed 3/29/2016)

Does the PHA plan to reopen the list in the PHA plan year? ☐ YES ☒ NO

Does the PHA permit specific categories of families onto the waiting lists, even if generally closed?

☐ YES ☒ NO

The following data relative to affordability, supply, quality, accessibility, etc. of families who reside in the jurisdiction served by PBCHA is drawn from the Palm Beach County's Draft 5 – Year Consolidated Action Plan FY 2020-2024, and FY 2020- 2021 Annual Action Plan; the 2000 Census; the 2013-2017 American Community Survey (ACS) and the 2011-2015 Comprehensive Housing Affordability Strategy (CHAS).

The Palm Beach County Urban County Program Jurisdiction excludes the municipalities of Boca Raton, Boynton Beach, Delray Beach, Highland Beach, Jupiter, Ocean Ridge, Palm Beach Gardens, Wellington and West Palm Beach. The Palm Beach County Housing Authority's jurisdiction encompasses all 39 municipalities within Palm Beach County.

Housing Needs Assessment Demographics

Demographics	Base Year: 2009	Most Recent Year: 2021	% Change
Population	1,320,134	1,497,987	14%
Households	508,520	595,447	12%
Median Income	\$53,538	70,002	30%

Table 5 – Housing Needs Assessment Demographics

Data Sources: 2005-2009 ACS (Base Year), 2021 ACS (Most Recent Year)

Number of Households Table	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households*	65,530	68,210	91,820	51,290	271,310
Small Family Households*	12,818	14,141	20,580	12,891	62,319
Large Family Households*	3,058	3,451	4,963	2,429	9,323
Household contains at least one person 62-74	10,394	9,789	13,750	7,946	37,769
Household contains at least one person age 75 or older	11,289	14,405	15,251	6,403	25,719
Household contains at least one person age 6 or younger*	7,309	7,100	8,576	4,338	13,173

Table 6 – Total Households Table Data Source: 2011-2015 CHAS

Housing Needs Assessment Demographics cont'd

Housing Needs Assessment - Number of Housing Units/Supply

Per the 2011 – 2015 CHAS data, there are 329,193 households in the Urban County Program Jurisdiction. Applying the rates of tenure from the 2017 ACS yields an estimated 234,056 owners (71.1%) and 95,137 renters (28.9%). Out of all households, 56.7% have incomes below Area Median Income. Small family households represent 37.3% of all households, and large family households represent 7.1%. Forty-six percent of all households have at least one person age 62 or older, and among these 58.4% have incomes below the Area Median Income. Households with young children (6 years or less) are less prevalent (12.3% of all households) but are more often lower income (67.5% are below Area Median Income).

All residential properties by number of units

Property Type	Number	%
Unit detached structure	292,561	49%
1-unit, attached structure	73,892	12%
2-4 units	53,933	9%
5-19 units	36,089	6%
20 or more units	124,060	21%
Mobile Home, boats, RV, van, etc.	14,912	3%
Total	595,447	100%

Table 28 – Residential Properties by Unit Number Data Source: 2021 ACS

Unit Size by Tenure	Owners		Renters	
	Numbers	%	Number	%
No bedroom	2,428	1%	7,779	4%
1 bedroom	15,059	3%	41,507	24%
2 bedrooms	129,907	31%	78,311	44%
3 or more bedrooms	271,742	65%	48,714	28%
Total	419,136	100%	176,311	100

Table 29 – Unit Size by Tenure Data Source: 2021 ACS

Housing Needs Assessment Demographics cont'd

Housing Needs Assessment - Cost of Housing / Affordability

The Palm Beach County Comprehensive Plan considers housing to be affordable if monthly rents, including utilities or monthly mortgage payments, including property taxes and insurance, do not exceed thirty percent (30%) of the household's median adjusted gross income for very low, low and moderate income. Households are considered cost burdened when housing costs exceed thirty percent (30%) of gross household income. "Sever cost burden" occurs when a household's housing costs exceed fifty percent (50%) of gross household income.

Cost of Housing	Base Year: 2009	Most Recent Year: 2021	% Change
Median Home Value	278,500	563,000	30%
Median Contract Rent	953	1,560	63%

Table 30 – Cost of Housing

Data Source: 2005- 2009 ACS (Base Year), 2021 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	5,051	3%
\$500-999	20,205	12%
\$1000-1,499	52,198	31%
\$1,500-\$1,999	51,567	31%
\$2000 or more	39,358	23%
Total	168,379	100.0%

Table 31 – Rent Paid

Data Source: 2021 ACS

Housing Affordability

% Units Affordable to Households earnings	Renter	Owner
30% HAMFI	36,595	41,760
50% HAMFI	31,600	42,335
80% HAMFI	38,375	60,505
100% HAMFI	65,910	237,005
Total	172,485	381,610

Table 32 – Housing Affordability

Data Source: 2015-2019 CHAS

Housing Needs Assessment Demographics cont'd

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	940 - 1070	1140 - 1300	1410 - 1610	1890 - 2160	2300 - 2630
High HOME Rent	1028	1102	1324	1521	1678
Low HOME Rent	805	862	1035	1196	1335

Table 33 – Monthly Rent

Data Source: HUD Small Area FMR and HOME Rents

Housing Market Analysis: - Condition of Housing

According to the 2021 American Community Survey (ACS), Palm Beach County jurisdiction's housing inventory consists of an estimated 713,808 housing units. The majority of the units (67%) were built after 1980, and the median age of all units is approximately 35 years old. According to the 2021 ACS, 595,447 of the units were occupied, while 118,361 units were vacant.

The ACS data indicates that of the housing conditions considered by HUD as components of substandard housing (lack of complete kitchen or plumbing facilities; overcrowding at 1.01 or more persons per room; and housing cost burden at more than 30% of income toward housing, the incidence of units with one or more conditions is higher for rental units (59%) than for owner-occupied units (35%). Per 2011-2015 CHAS data provided by HUD, households with less than 100% AMI experience substandard housing conditions, of which 89% of them are related to cost burden rather than overcrowding or a physical deficiency, such as lack of kitchen or plumbing facilities.

Definitions

Standard condition - a housing unit that meets or exceeds HUD's Housing Quality Standards (HQS) (24 CFR 982.401) and all applicable state and local building codes and ordinances.

Housing problems are defined as:

- Substandard housing - households without hot or cold piped water, a flush toilet, a bathtub or shower; or with kitchen facilities that lack a sink with piped water, a stove or range, or a refrigerator.
- Severely Overcrowded - households housing more than 1.51 persons per room excluding bathrooms, porches, foyers, halls or half-rooms.
- Overcrowded – households housing 1.01 to 1.5 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.
- Severe Cost Burden (>50%) – the fraction of the household's total gross income spent on housing costs exceeds 50%. For renters, housing costs include rent plus utilities. For owners, housing cost include mortgage payment, taxes, insurance and utilities.

Housing Needs Assessment Demographics cont'd

- Cost Burden (.30-50%) - the fraction of the household's total gross income spent on housing costs exceeds 30% but is less than 50%. For renters, housing cost include rent plus utilities. For owners, housing costs include mortgage payment, taxes, insurance and utilities.

Substandard but suitable for rehabilitation – Housing units that have one or more of the previously indicated housing conditions but have no critical structural and/or environmental defects and are finically feasible to rehabilitate.

Condition of Units	Owner Occupied		Renter Occupied	
	Number	%	Number	%
With one selected condition	91,247	26%	51,887	43%
With two selected conditions	3,406	1%	6,404	5%
With three selected conditions	222	0%	432	0%
With four selected conditions	24	0%	45	0%
No selected conditions	259,125	73%	61,383	52%
Total	354,024	100%	120,151	100%

Table 34 – Condition of Units

Data Source: 2021 ACS

Risks of Lead Based Paint Hazard	Owner Occupied		Renter Occupied	
	Number	%	Number	%
Total number of units built before 1980	127,808	67%	63,614	33%
Housing Units built before 1980 with children Present	29,591	13%	15,996	17%

Table 36 – Risk of Lead Based Paint

Data Source: 2019 ACS (Total Units); 2011-2015 CHAS (Units with Children present)

Strategy for Addressing Housing Needs

A. Need: Shortage of affordable housing for all eligible populations:

Strategy 1. Maximize the number of affordable units available to the PHA within its current resources:

- ☒ Employ effective maintenance and management policies to minimize the number of public housing units off-line.
- ☒ Reduce turnover time for vacated public housing units by use of PBCHA maintenance personnel, special teams/programs and/or outsourcing where appropriate.
- ☒ Seek replacement of public housing units lost to the inventory through mixed finance development, RAD and/or vouchers.
- ☒ Maintain or increase HCVP lease-up rates by maintaining or increasing payment standards if applicable that will enable families to rent throughout the jurisdiction.
- ☒ Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required.
- ☒ Maintain or increase HCVP lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration.
- ☒ Participate in the Consolidated Plan development process to ensure coordination with broader community strategies.
- ☒ Seek additional Federal grant funds and State Capital Improvement Project funding.

Strategy 2: Increase the number of affordable housing units and de-concentrate public housing:

- ☒ Apply for additional HCV units should they become available.
- ☒ Continue to leverage private and/or other public funds to create additional housing opportunities
- ☒ Continue planning for the utilization of RAD and Demolition/Disposition Section 18 for the rehabilitation, disposition, or redevelopment of existing Public Housing properties in order to improve and increase the number of affordable housing units
- ☒ Pursue housing resources other than public housing or HCVP tenant-based assistance.

Strategy for Addressing Housing Needs cont'd

B. Need - Specific Family Types: Families at or below 30% of median

Strategy 3: Target available assistance to families at or below 30 % of AMI

- ☒ Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing.
- ☒ Exceed HUD federal targeting requirements for families at or below 30% of AMI in housing choice voucher assistance.
- ☒ Adopt rent policies and assess any programs that support and encourage work.

C. Need: Specific Family Types: Families at or below 50% of median

Strategy 4: Target available assistance to families at or below 50% of AMI

- ☒ Employ admission preferences aimed at families who are working
- ☒ Adopt rent policies and assess any programs that support and encourage work.
- ☒ Continue to partner with local & regional workforce partners to increase the number of employed/under-employed persons in assisted housing
- ☒ Provide programs, tools and resources for job skills development, job training and employment of public housing residents through resident programs and services, Section 3 program, scholarships and other available resources.
- ☒ Other: (list below):

Increase participation in the Housing Choice Voucher/PH Family Self-Sufficiency(FSS) program

D. Need: Specific Family Types: The Elderly

Strategy 5: Target available assistance to the elderly:

- ☒ Seek designation of public housing for the elderly.
- ☒ Apply for special-purpose vouchers targeted to the elderly, should they become available.

Strategy for Addressing Housing Needs cont'd

E. Need: Specific Family Types: Families with Disabilities

Strategy 6: Target available assistance to Families with Disabilities:

- ☒ Carry out the modifications needed in public housing based on the Green Physical Needs Assessment (GPNA) for public housing.
- ☒ Provide higher payment standards for families needing ADA units.
- ☒ Apply for special-purpose vouchers targeted to families with disabilities, should they become available.
- ☒ Affirmatively market to local non-profit agencies that assist families with disabilities.

A. Need: Specific Family Types: Races or ethnicities with disproportionate housing needs

Strategy 7: Conduct activities to affirmatively further fair housing

- ☒ Counsel HCVP tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units.
- ☐ Market the HCV program to owners outside of areas of poverty/minority concentrations.
- ☐ Provide training of fair housing laws to housing providers and to tenants with Limited English Proficiency (LEP).

Reasons for Selecting Strategies

- ☒ Staffing Constraints
- ☒ Funding Constraints
- ☒ Limited availability of sites for assisted housing
- ☒ Evidence of housing needs as demonstrated in the Palm Beach County FY 2020- 2024 Consolidated Plan, 2020- 2021 Annual Action Plan and other information available to the PHA.
- ☒ Influence of the housing market on PHA programs.
- ☒ Community priorities regarding housing assistance.
- ☒ Results of consultation with local or state government.
- ☒ Results of consultation with residents and the Resident Advisory Board (RAB).
- ☒ Results of consultation with advocacy groups.

Revision of PHA Plan Elements: ACOP and Administrative Plan

For the noted plan elements, PBCHA has revised/adopted changes to the Admissions and Continued Occupancy Policy (ACOP) for Federally Assisted Public Housing (PH) and Administrative Plan for the Housing Choice Voucher Program (HCVP) consistent with federal statutory or regulatory changes and/or discretionary changes contained in the following:

- **PH/HCV** –To be eligible for the housing programs: Added: “...must meet the net asset and property ownership restriction requirements in § 5.618.”
- **PH/HCV** –Add: HOTMA, § 5.618 creates a restriction on the eligibility of a family to receive assistance if the family owns real property that is suitable for occupancy by the family as a residence or has assets in excess of \$100,000 (as adjusted annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers.)

Exceptions may be made if:

The property does not meet the disability-related needs for all members of the family, including physical accessibility requirements; a disability-related need for additional bedrooms, proximity to accessible transportation, etc. Property owned with another non-household member that does not reside with the family when that non-household member lives in the jointly owned property such as instances where a family member owns a fractional interest of a property with other relatives that do not reside with the family.

A property is geographically located so that the distance or commuting time between the property and the family's place of work or a family member's educational institution would create a hardship for the family, as determined by the PHA, it may not be suitable.

A property is considered unsafe to reside in when the property's physical condition poses a risk to the family's health and safety and the condition of the property cannot be easily remedied.

- **PH- Chapter 4 APPLICATIONS, WAITING LIST AND TENANT SELECTION**

4-II.B. ORGANIZATION OF THE WAITING LIST (PAGE 76)

CHANGE: The PHA will maintain ~~site-based~~ community-wide waiting lists for all of its Public Housing developments.

- **PH/HCV- CHANGE:** While the family is on the waiting list, the family must inform the PHA, within 10 calendar days, 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 writing~~ online in the applicant's waiting list profile.

- **PH/HCV – CHANGE:** The waiting list will be updated annually to ensure that all applicant information is current and timely.

CHANGE: To update the waiting list, the PHA will send an update request via email ~~or first-class mail~~ 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 ~~or physical address~~ that the PHA 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.

CHANGE: The family's response must be submitted via the PBCHA online Resident Portal ~~in writing and may be delivered in person, by mail, email or by fax.~~ Responses ~~should be postmarked or received by the PHA.~~ Updates must be completed no later than 10 calendar days from the date of the PHA email notification to the family letter.

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

~~DELETE: If the notice 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 15 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.~~

- **PH/HCV- CHANGE:** If a family is removed from the waiting list because the PHA has determined the family is not eligible for admission, a notice will be sent to the family's last email address ~~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 PHA's decision (see Chapter 14) [24 CFR 960.208(a)].

- **PH- 4-III.C. NOTIFICATION OF SELECTION (PAGE 88)**

CHANGE: The PHA will notify the family by electronic mail ~~or first-class mail...~~

CHANGE: ~~If a notification letter is returned to the PHA as undeliverable...~~ If the family does not respond to the notification of selection within 10 calendar days, the family will be removed from the waiting list without further notice.

- **PH- ADD:** Preference for non-public housing over-income families. The PHA may adopt a preference for admission of non-public housing over-income families paying the alternative non-public housing rent and are on a NPHOI lease who become an income-eligible low-income family as defined in § 5.603(b) of this title and are eligible for admission to the public housing program.

- **PH- CHANGE:** The PHA will assign one bedroom for each two persons withing the household, live-in aides will not be ~~be included when determining the unit size~~ provided a separate bedroom. No additional bedrooms will be provided for the live-in aide's family.

CHANGE: Single person families will be allocated a zero or one bedroom.

~~DELETE: Persons of the opposite sex, other than spouses and children under the age of 5, will be allocated different bedrooms.~~

~~DELETE: Persons of different generations will not be required to share a bedroom.~~

~~DELETE: A single parent with a child under the age of five (5) years will be allocated a single bedroom for both parent and child.~~

CHANGE: An unborn child will ~~not~~ be counted as a person in determining unit size.

KEEP: Children in the process of being adopted will be considered when determining unit size.

Added: Foster children will be included in determining unit size only if they will be in the unit for more than six months.

Added: Space may be provided for a child who is away at school, but who lives with the family during school recesses.

Added: A child who is temporarily away from the home because of placement in foster care is considered a member of the family in determining the family unit size.

Added: Space will not be provided for a family member, other than a spouse, who will be absent most of the time, such as a member who is away in the military.

- **PH- ADD** HOTMA removed the statutory authority for EID, so HUD cannot retain the disallowance once the statutory change is in effect, which it will be upon the effective date of this final rule, January 1, 2024. However, HUD agrees that if a family is receiving a disallowance of increase in annual income in accordance with §§ 5.617(c) and 960.255(b) on this final rule's effective date, participants should be able to benefit from EID for the full 24 months. Therefore, this final rule retains the regulations for EID for this time period. However, the EID will be available only to families that are eligible for and participating in the program on the effective date of the final rule; no new families may be added.

PH/HCV - CHANGE ~~There is no asset limitation for participation in the public housing program.~~ Per requirements in HOTMA, § 5.618 creates a restriction on the eligibility of a family to receive assistance if the family owns real property that is suitable for occupancy by the family as a residence or has assets in excess of \$100,000, (as adjusted annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers.)

Imputing Income from Assets

CHANGE When net family assets are ~~\$5,000~~ \$50,000 or less, the PHA will allow the family to self-certify. When the family has net family assets in excess of ~~\$5,000~~ \$50,000 the PHA will include in annual income the greater of (1) the actual income derived from the assets or (2) the imputed income.

- **PHA/HCV** - In determining adjusted income, the responsible entity (PHA) must deduct the following amounts from annual income:

CHANGE (1) ~~\$480 for each dependent~~; \$480 for each dependent, which amount will be adjusted by HUD annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers, rounded to the next lowest multiple of \$25;

CHANGE (2) ~~\$400 for any elderly family or disabled family~~ \$525 for any elderly family or disabled family, which amount will be adjusted by HUD annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers, rounded to the next lowest multiple of \$25;

CHANGE Unreimbursed medical expenses may be deducted to the extent that, in combination with any disability assistance expenses, they exceed three ten percent of annual income. [24 CFR 5.611(a)(3)(i)]

- **PHA/HCV** – CHANGE: 1. Phased-in relief. This paragraph provides financial hardship relief for families affected by the statutory increase in the threshold to receive health and medical care expense and reasonable attendant care and auxiliary apparatus expense deductions from annual income.

(i) Eligibility for relief. To receive hardship relief under this paragraph (c)(1), the family must have received a deduction from annual income because their sum of expenses under paragraph (a)(3) of this section exceeded 3 percent of annual income as of January 1, 2024.

(ii) Form of relief.

(A) The family will receive a deduction totaling the sum of the expenses under paragraph (a)(3) of this section that exceed 5 percent of annual income.

(B) Twelve months after the relief in this paragraph (c)(1)(ii) is provided, the family must receive a deduction totaling the sum of expenses under paragraph (a)(3) of this section that exceed 7.5 percent of annual income.

(C) Twenty-four months after the relief in this paragraph (c)(1)(ii) is provided, the family must receive a deduction totaling the sum of expenses under paragraph (a)(3) of this section that exceed ten percent of annual income and the only remaining relief that may be available to the family will be paragraph (d)(1) of this section. e paragraph (d)(1) of this section.

(D) A family may request hardship relief under paragraph (c)(2) of this section prior to the end of the twenty-four-month transition period. If a family making such a request is determined eligible for hardship relief under paragraph (c)(2) of this section, hardship relief under this paragraph ends and the family's hardship relief shall be administered in accordance with paragraph (c)(2) of this section. Once a family chooses to obtain relief under paragraph (c)(2) of this section, a family may no longer receive relief under this paragraph.

(2) General - provides financial relief for an elderly or disabled family or a family that includes a person with disabilities that is experiencing a financial hardship.

(i) Eligibility for relief.

(A) To receive hardship relief under this paragraph (c)(2), a family must demonstrate that the family's applicable health and medical care expenses or reasonable attendant care and auxiliary apparatus expenses increased or the family's financial hardship is a result of a change in circumstances (as defined by the responsible entity) that would not otherwise trigger an interim reexamination.

(B) Relief under this paragraph (c)(2) is available regardless of whether the family previously received deductions under paragraph (a)(3) of this section, is currently receiving relief under paragraph (c)(1) of this section, or previously received relief under paragraph (c)(1) of this section.

(ii) Form and duration of relief.

(A) The family will receive a deduction for the sum of the eligible expenses in paragraph (a)(3) of this section that exceeds 5 percent of annual income.

(B) The family's hardship relief ends when the circumstances that made the family eligible for the relief are no longer applicable or after 90 days, whichever comes earlier. However, responsible entities may, at their discretion, extend the relief for one or more additional 90-day periods while the family's hardship condition continues.

(d) Exemption to continue childcare expense deduction. A family whose eligibility for the childcare expense deduction is ending may request a financial hardship exemption to continue the child care expense deduction under paragraph (a)(4) of this section. The responsible entity must recalculate the family's adjusted income and continue the child care deduction if the family demonstrates to the responsible entity's satisfaction that the family is unable to pay their rent because of loss of the child care expense deduction, and the child care expense is still necessary even though the family member is no longer employed or furthering his or her education. The hardship exemption and the resulting alternative adjusted income calculation must remain in place for a period of up to 90 days. Responsible entities, at their discretion, may extend such hardship exemptions for additional 90-day periods based on family circumstance.

(e) Hardship policy requirements.

(1) Responsible entity determination of family's inability to pay the rent.

change: The responsible entity must establish a policy on how it defines what constitutes a hardship under paragraphs (c) and (d) of this section, which includes determining the family's inability to pay the rent, for purposes of determining eligibility for a hardship exemption under paragraph (d) of this section.

(2) Family notification.

The responsible entity must promptly notify the family in writing of the change in the determination of adjusted income and the family's rent resulting from the hardship exemption. The notice must also inform the family of when the hardship exemption will begin and expire (i.e., the time periods specified under paragraph (c)(1)(ii) of this section or within 90 days or at such time as the responsible entity determines the exemption is no longer necessary in accordance with paragraphs (c)(2)(ii)(B) or (d) of this section).

- **PHA** – Added- HUD regulations specify the formula for calculating the total tenant payment (TTP) for a tenant family. TTP is the highest of the following amounts, rounded to the nearest dollar:

30 percent of the family's monthly adjusted income (adjusted income is defined in Part II)

10 percent of the family's monthly gross income (annual income, as defined in Part I, divided by 12)
12) The welfare rent (in as-paid states only)

A minimum rent between \$0 and \$50 that is established by the PHA , Added The alternative non-public housing rent, as determined in accordance with § 960.102 of this title.

- **PHA** - Added Non-public housing over-income families must pay the alternative non-public housing rent as applicable, as determined in accordance with § 960.102.

For families who choose flat rents, the PHA must conduct a reexamination of family composition at least annually and must conduct a reexamination of family income at least once every 3 years [24 CFR 960.257(a)(2)] ...

ADD ...except for families a PHA determines exceed the over-income limit described in § 960.507(b). Once a PHA determines that a family has an income exceeding the over-income limit, the PHA must follow the income examination and notification requirements under § 960.507(c).

- **PHA/HCV - CHANGES AFFECTING INCOME OR EXPENSES)** Interim reexaminations. Family-Initiated Interim Reexaminations

A family may request an interim reexamination of family income or composition because of any changes since the last determination. The PHA must conduct any interim reexamination within a reasonable period of time after the family request or when the PHA becomes aware of an increase in family adjusted income.

The PHA may decline to conduct an interim reexamination of family income if the PHA estimates the family's adjusted income will decrease by an amount that is less than ten percent

of the family's annual adjusted income (or a lower amount established by HUD by notice), or a lower threshold established by the PHA.

Required Reporting

ADD The PHA must conduct an interim reexamination of family income when the PHA becomes aware that the family's adjusted income (as defined in § 5.611 of this title) has changed by an amount that the PHA estimates will result in an increase of ten percent or more in annual adjusted income or such other amount established by HUD through notice, except:

(i) The PHA may not consider any increase in the earned income of the family when estimating or calculating whether the family's adjusted income has increased, except that, based on the PHA's established written policy, the PHA may consider increases in earned income if the PHA has processed an interim reexamination for a decrease in the family's income under paragraph (b)(1) of this section within the same annual or biennial reexamination cycle;

and (ii) The PHA may choose not to conduct an interim reexamination in the last three months of a family's certification period, in accordance with the PHA's established written policy.

ADD (4) For over-income families in the period of up to six months before their tenancy termination pursuant to § 960.507(d)(2), the PHA must conduct an interim reexamination of family income as otherwise required under this paragraph. However, the resulting income determination will not make the family eligible to remain in the public housing program beyond the period before termination as defined by PHA policy.

- **PHA/HCV - PROCESSING THE INTERIM REEXAMINATION**

Method of Reporting

CHANGE PHA Policy The family may notify the PHA of changes either orally or in writing electronically via the PBCHA Resident Portal. If the family provides oral notice, the PHA may also require the family to submit the changes in writing.

- **PHA - Added Families exceeding the income limit.**

(a) In general. Families participating in the public housing program must not have incomes that exceed the over-income limit, as determined by paragraph (b) of this section, for more than 24 consecutive months.

(1) This provision applies to all families in the public housing program, including FSS families and all families receiving EID.

(i) Mixed families (as defined in § 5.504 of this title) who are non-public housing over-income families pay the alternative non-public housing rent (as defined in § 960.102), as applicable.

(ii) All non-public housing over-income families are precluded from participating in a public housing resident council.

(iii) Furthermore, non-public housing over-income families cannot participate in programs that are only for public housing or low-income families.

(iv) PHAs cannot provide any Federal assistance, including a utility allowance, to non-public housing over-income families.

(b) Determination of over-income limit. The over-income limit is determined by multiplying the applicable income limit for a very low-income family as defined in § 5.603(b) of this title, by a factor of 2.4.

(c) Notifying over-income families.

(1) If the PHA determines the family has exceeded the over-income limit pursuant to an income examination, the PHA must provide written notice to the family of the over-income determination no later than 30 days after the income examination. The notice must state that the family has exceeded the over-income limit and continuing to exceed the over-income limit for a total of 24 consecutive months will result in the PHA following its continued occupancy policy for over-income families in accordance with paragraph (d) of this section. Pursuant to 24 CFR part 966, subpart B, the PHA must afford the family an opportunity for a hearing if the family disputes within a reasonable time the PHA's determination that the family has exceeded the over-income limit.

(2) The PHA must conduct an income examination 12 months after the initial over-income determination described in paragraph (c)(1) of this section, unless the PHA determined the family's income fell below the over-income limit since the initial over-income determination. If the PHA determines the family has exceeded the over-income limit for 12 consecutive months, the PHA must provide written notification of this 12-month over-income determination no later than 30 days after the income examination that led to the 12-month over-income determination. The notice must state that the family has exceeded the over-income limit for 12 consecutive months and continuing to exceed the over-income limit for a total of 24 consecutive months will result in the PHA following its continued occupancy policy for over-income families in accordance with paragraph (d) of this section. Additionally, if applicable under PHA policy, the notice must include an estimate (based on current data) of the alternative non-public housing rent for the family's unit. Pursuant to 24 CFR part 966, subpart B, the PHA must afford the family an opportunity for a hearing if the family disputes within a reasonable time the PHA's determination that the family has exceeded the over-income limit.

(3) The PHA must conduct an income examination 24 months after the initial over-income determination described in paragraph (c)(1) of this section, unless the PHA determined the family's income fell below the over-income limit since the second over-income determination. If the PHA determines the family has exceeded the overincome limit for 24 consecutive months, then the PHA must provide written notification of this 24-month overincome determination no later than 30 days after the income examination that led to the 24-month over-income determination. The notice must state:

(i) That the family has exceeded the over-income limit for 24 consecutive months.

(ii) That the PHA must either terminate the family's tenancy or charge the family the alternative non-public housing rent, in accordance with its continued occupancy policy for over-income families in accordance with paragraph (d) of this section.

(A) If the PHA determines that under its policy the family's tenancy must be terminated in accordance with paragraph (d)(2) of this section, then the notice must inform the family of this determination and state the period of time before tenancy termination.

(B) If the PHA determines that under its policy the family must be charged the alternative non-public housing rent in accordance with paragraph (d)(1) of this section, then the notice must inform the family of this determination and state that the family be charged the alternative non-public housing rent in accordance with paragraph (d)(1) of this section. The PHA must also present the family with a new lease, in accordance with the requirements at § 960.509, and inform the family that the lease must be executed no later than 60 days of the date of the notice or at the next lease renewal, whichever is sooner.

(iii) Pursuant to 24 CFR part 966, subpart B, the PHA must afford the family an opportunity for a hearing if the family disputes within a reasonable time the PHA's determination that the family has exceeded the over-income limit.

(4) If, at any time during the consecutive 24-month period following the initial over-income determination described in paragraph (c)(1) of this section, a PHA determines that the family's income is below the over-income limit, the family is entitled to a new 24 consecutive month period of being over-income and new notices under paragraphs (c)(1), (c)(2), and (c)(3) of this section if the PHA later determines that the family income exceeds the over-income limit.

(d) End of the 24 consecutive month grace period.

Once a family has exceeded the over-income limit for 24 consecutive months, the PHA must, as detailed in its admissions and continued occupancy policies:

(1) Require the family to execute a new lease consistent with § 960.509 and charge the family the alternative non-public housing rent, as defined in § 960.102, no later than 60-days after the notice is provided pursuant to paragraph (c)(3) of this section or at the next lease renewal, whichever is sooner; or

(2) Terminate the tenancy of the family no more than 6 months after the notification under paragraph (c)(3) of this section as determined by the PHA's continued occupancy policy. PHAs must continue to charge these families the family's choice of income-based, flat rent, or prorated rent for mixed families during the period before termination. The PHA must give appropriate notice of lease tenancy termination (notice to vacate) in accordance with State and local laws.

(e) Status of families.

An over-income family will continue to be a public housing program participant until their tenancy is terminated by the PHA in accordance with paragraph (d)(2) of this section or the

family executes a new non-public housing lease in accordance with paragraph (d)(1) of this section.

(f) Reporting.

Each PHA must submit a report annually to HUD that specifies, as of the end of the year, the number of families residing in public housing with incomes exceeding the over-income limit and the number of families on the waiting lists for admission to public housing projects and provide any other information regarding over-income families requested by HUD. These reports must also be publicly available.

- **PH - COMMUNITY SERVICE REQUIREMENT Added:** is a member of a non-public housing over-income family

- **PH - TRANSFERS**

DELETE When a family transfers from one unit to another, the PHA will transfer their security deposit to the new unit. The tenant will be billed for any maintenance or others charges due for the "old" unit. If the security deposit is more due to being a larger unit, the tenant will be responsible for the difference.

ADD When a family transfers from one unit to another, the PHA will not transfer their security deposit to the new unit. The tenant will be required to provide a new security deposit upon transfer to a new unit. The tenant will be billed for any maintenance or others charges due for the "old" unit. If the security deposit is insufficient to cover such charges, the tenant will be required to pay the difference. Any security deposit remaining after deduction of said charges will be refunded to the tenant in accordance with State and Local law. If the new security deposit is more due to being a larger unit, the tenant will be responsible for the difference.

- **PH –Added Over-Income Families [24 CFR 960.261**

Effective March 16, 2023, HOTMA removed 960.261 and added 960.507 and 960.509.

Added 960.507 Families exceeding the income limit. Refer to Chapter 9 for discussion of over-income families.

Subject to certain restrictions, HUD authorizes PHAs to evict or terminate the tenancies of families because they are over income. PHA must apply over-income limits to all families through interim and/or annual reexamination. PHA must establish guidelines to determine options for over-income families, necessary HUD tracking and reporting.

1. The form HUD-50058 actions that would trigger the two-year grace period are: '2 = Annual Reexamination' and '3 = Interim Reexamination.' PHAs are required to begin tracking these actions once a family's income exceeds the applicable over-income limit. If one year after the

initial over-income finding by the PHA, the family's income continues to exceed the over-income limit, the PHA must provide written notification to the family.

2. This notification must inform the family that their income has exceeded the over-income limit for one year, and if the family's income continues to exceed the over income limit for the next 12 consecutive months, the family will be subject to either a higher rent or termination based on the PHA's policies. If the initial over-income determination was made during an interim reexamination, the PHA must conduct a second interim income reexamination on that date one year later. However, if a PHA discovers through an annual or interim reexamination that a previously over-income family has income that is now below the over-income limit, the family is no longer subject to these provisions. A previously over-income family would be entitled to a new two-year grace period if the family's income once again exceeds the over-income limit. Twelve months after the second consecutive over-income finding, if the family is still over-income, the family is subject to termination or higher rental payments.

Added § 960.509 Lease requirements for non-public housing over-income families.

Added (a) In general. If a family, when permitted by written PHA's continued occupancy policy, elects to remain in a public housing unit paying the alternative non-public housing rent, the PHA and each non-public housing over-income (NPHOI) family (referred to as the "tenant" in this section) must enter into a lease. The tenant and the PHA must execute the lease, as presented by the PHA pursuant to §960.507(c)(3)(ii)(B) no later than 60 days after the notice provided pursuant to § 960.507(c)(3) or at the next lease renewal, whichever is sooner. If the tenant does not execute the lease within this time period, the PHA must terminate the tenancy of the tenant no more than 6 months after the notification under § 960.507(c)(3) in accordance with 960.507(d)(2). Notwithstanding, a PHA may permit, in accordance with its policies, an over-income family to execute the lease beyond this time period, but before termination of the tenancy, if the over-income family pays the PHA the total difference between the alternative nonpublic housing rent and their public housing rent dating back to the point in time that the over-income family was required to execute the lease.

Added No automatic lease renewal. Upon expiration of the lease term, the lease shall not automatically renew.

Revision of PHA Plan Elements cont'd

The following policies are also contained within PBCHA's ACOP/Admin Plan and available at PBCHA's Administrative Offices and/or Management Offices:

1. Eligibility, Selection and Admissions and Wait List Policies
2. Deconcentration Policy
3. Rent Determination Policy
4. Operation and Management
5. Grievance Procedure
6. Homeownership Programs
7. Community Service and Self- Sufficiency Program
8. Pet Policy

The Department of Housing and Urban Development (HUD) issued NOTICE PIH 2020-13 on July 2, 2020. Pursuant to the authority provided under the CARES Act, HUD is waiving and establishing alternative requirements for numerous statutory and regulatory requirements for the Public Housing program and Housing Choice Voucher (HCV) program. These waivers provided administrative flexibilities and relief to the Palm Beach County Housing Authority (PBCHA) in response to the COVID-19 national emergency.

In Notice PIH 2020-05, published on April 10, 2020, HUD exercised its authority under the CARES Act to establish waivers and administrative flexibilities to provide relief to Public Housing Agencies (PHAs), Indian tribes, and tribally designated housing entities (TDHEs) in response to the COVID-19 pandemic. In the revision to that Notice and in subsequent Notices, HUD restated the waivers and alternative requirements established previously in Notice PIH 2020-05, PIH 2020-33; Notice 2020-32; PIH Notice 2020-31; PIH 2020-22; PIH-2020-20 PIH-2021-34 PIH 2021- 14; provided additional waivers and alternative requirements, extended the periods of availability for previously established waivers and alternative requirements, and issued technical amendments to several of the previously established waivers and alternative requirements. A complete list of the waivers and alternative requirements adopted by the PBCHA can be found on its website at www.pbhchafl.org. The CARES Act statutory waivers for PHAs made available through Notice PIH 2021-14 expired on December 31, 2021 and were not extended.

The PBCHA applied and received approval for certain regulatory waivers that were originally offered as part of the CARES Act waivers in Notice PIH 2021-14 to provide continued flexibility during the pandemic and pandemic recovery.

Financial Resources

This section lists the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year.

DRAFT

Financial Resources:		
Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2024 grants)		
a) Public Housing Operating Fund	\$1,720,050	Administration and Maintenance under the Operating Fund program.
b) Public Housing Capital Fund	1,602,221	Administration, Maintenance and Capital Improvements under the Capital Fund program.
c) Capital Fund Recovery Grant	-0-	
d) HOPE VI Revitalization	-0-	
e) HOPE VI Demolition	-0-	
f) Annual Contributions for Section 8 Tenant-Based Assistance	33,050,425	Administration and Housing/Utility Assistance Payments under HUD Section 8 programs.
g) Public Housing Drug Elimination	-0-	
h) Resident Opportunity and Self-Sufficiency Grants, including Family Self-Sufficiency	209,450	Administration under the ROSS and FSS program.
i) Community Dev. Block Grant	-0-	Palm Beach County
j) HOME	-0-	
Other Federal Grants (list below)	-0-	
Mainstream Voucher Program (MS5)	4,125,850	Administration and Housing/Utility Assistance

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		payments under HUD Section 8 programs.
Emergency Housing Voucher Program (EHV)	2,285,750	Administration and Housing/Utility Assistance Payments under HUD Section 8 programs.
Housing Opportunities for Persons With Aids (HOPWA)	3,245,000	Administration and Tenant Based Rental Assistance Payments under HOPWA program.
JOBS Plus Initiative Program	\$715,500	Administration under the JOBS Plus program.
2. Prior Year Federal Grants (unobligated funds only) (list below)		
Replacement Housing	-0-	
CFP 2022	1,435,050	In accordance with application

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
3. Public Housing Dwelling Rental Income		
a) Rents	\$ 1,425,850	Operation of PHA sites
b) Other Tenant Charges	41,500	Operation of PHA sites
c) JPEID Rents	\$ 375,250	Operation of PHA sites
4. Other income (list below)		
PH Reserves	\$ 627,500	Operations of PHA sites
HUD Held HCVP Reserves	1,485,750	HCVP HAP
PHA held HCVP Reserves	1,655,250	HCVP Administration & HAP
PHA held MS5 Reserves	77,500	MS5 Administration & HAP
HUD held MS5 Reserves	932,600	MS5 HAP
PHA held EHV Reserves	28,400	EHV Administration
PHA held NSP Reserves	13,200	Administration NSP
Cherry Hill Lot Reserves	\$ 2,861,885	Future Affordable Housing
5. Non-federal sources (list below)		
PH Non-Dwelling Income	\$ 12,500	Operation of PHA sites
HCVP Other Income	84,750	HCVP Administration
Mainstream Other Income	2,500	Mainstream Administration
Emergency Housing Other Income	1,250	Emergency Housing Admin
NSP Dwelling Rent	\$ 104,500	Operation of NSP sites
Total Resources	\$58,119,481	

Community Service and Self-Sufficiency

Palm Beach County Housing Authority Resident Services Department is a multi-faceted department that offers Resident and Community Services that promote education, self-sufficiency, and independent living.

The department is composed of the Family Self Sufficiency (FSS), Foster Youth to Independence (FYI), Job Plus, and Resident Opportunities and Self Sufficiency (ROSS) programs, while also providing supportive services to participants in the Public Housing and Housing Choice Voucher Programs.

Homeownership Programs

Palm Beach County Housing Authority does not have a homeownership program but provides such services to our residents and participants via collaborations with our community partners. Affordable Homeownership services for first-time homebuyers are offered under the Family Self Sufficiency program as a self-sufficiency goal participants can work towards. FSS participants receive referrals from the program coordinator to participate in Homeownership initiatives, homeownership readiness and counseling trainings through the following community partners:

The Resident Services Department Programs develops and implements a wide range of programs to respond to the supportive service, employment, training and other needs of Palm Beach County Housing Authority residents. The overall goals are to support work-able residents in achieving economic self-sufficiency, assist youth in public housing, and collaborate with local educational institutions, social service agencies, health care providers and other stakeholders to implement place-based and countywide resident programs.

Resident Services staff works closely with PBCHA's community partners to provide technical support to program participants through local resident organizations. Our community partners provide technical training, job readiness, employment and training, financial literacy, homeownership counseling, and other services for all PBCHA program participants and residents. PBCHA offers four self-sufficiency programs residents can participate in to achieve economic growth and reduce dependency on federal fundings.

Family Self-Sufficiency (FSS)

The PBCHA's Family Self-Sufficiency (FSS) Coordinators, provide case management and supportive services to FSS participants. The PBCHA has 111 mandated FSS slots between for its PH and HCV participants, with 98 Families are currently enrolled and work with the FSS Coordinators to develop five-year family self-sufficiency plans. Coordinators help families to access services and training programs that help them develop the tools to work toward self-sufficiency. As family income increases, matching funds from rent increases are placed in escrow for families to use when they complete their plan. Escrow funds can also be used for education, home ownership, and starting a small business.

Foster Youth-to-Independence (FYI)

This initiative targets housing assistance to young people aging out of foster care and who are at extreme risk of experiencing homelessness. The initiative offers housing vouchers to local public housing authorities to prevent or end homelessness among young adults aged 18 to 24, or have recently left, the foster care system without a home to go to. PBCHA currently has 24 participants enrolled in the program.

Job Plus

PBCHA continues to implement the Jobs Plus program at Seminole Estates and Dyson Circle Apartment. The program has enrolled 147 residents, of which over 50% are currently employed. The Jobs Plus program was created to develop locally based, job-driven approaches to increase income and employment outcomes for residents of public housing. The program helps residents improve their earnings and employability through training, incentives, and services.

Residents Opportunities and Self-Sufficiency (ROSS)

The ROSS program assesses public housing resident needs at Dyson Circle and Schall Landing and to connect them with education, job training and placement programs and/or computer and financial literacy services available in the community to promote self-sufficiency. Our ROSS Coordinator is currently working with 60 enrolled participants at both sites and community service providers to tailor services to the needs of eligible residents, establishing a system to monitor and evaluate service delivery and outcomes, and coordinating with other independent living programs.

Safety and Crime Prevention

PBCHA utilizes the following data and research methods in determining an action plan for the PBCHA to identify, address and develop crime reduction approaches within its communities. In doing so, PBCHA seeks the support of the Palm Beach County Sheriff's Office (PBSO) and other community organizations and advocacy groups to help improve the safety of its residents and communities. The PBSO community officers work closely with Site Management staff to strategize and institute best practices for maintaining a safe community.

PBCHA will use:

1. Statistics of crime in and around the housing communities and other available resources.
2. Reports by residents and others of criminal activity
3. Housing Authority employee observations and/or reports of suspicious activity
4. Ongoing criminal reports and investigations of criminal activity

PBCHA will continue to partner with departments and/or organizations in the Palm Beach County area to develop and implement strategies to reduce crime. In partnership with these organizations, PBCHA will work to identify the physical and social factors that contribute to crime within its communities while also reviewing its policies and those of local government which can be used to address crime.

PBCHA will seek to develop and implement strategies that:

1. Utilize available resources to continue to stress the importance of resident involvement in crime prevention.
2. Consider physical design characteristics when engaging in capital improvements, rehabilitation or redevelopment activities that can reduce criminal opportunities.
3. Continue to apply for funding opportunities aimed at addressing emergencies, natural disasters, safety and security, including measures necessary to address crime and drug-related activity.

Violence Against Women Act (VAWA) Statement

Palm Beach County Housing Authority addresses VAWA in its Housing Choice Voucher Program (HCVP) Administrative Plan and the Public Housing Admissions and Continued Occupancy Policy (ACOP). The responsibility of not terminating families from housing for reasons that fall under the VAWA regulation is particularly addressed. PBCHA has adopted HUD's Model Emergency Transfer Plan for victims of domestic violence in our housing programs.

The PBCHA follows the VAWA program policies and regulations with the goal of providing safeguards for families falling under the VAWA related program requirements and refers households, as needed, to local domestic violence service provider partners. PBCHA has amended all its policies to comply with PIH

2017-08 Violence Against Women Reauthorization Act (VAWA) of 2013.

Asset Management

PBCHA continues to comply with the Asset Based Management activities required by federal regulation. PBCHA continues to evaluate the effectiveness of centralized support services, staffing, and Asset Management Projects (AMP) configurations. PBCHA continues transitioning its electronic business system to YARDI software. Yardi will provide PBCHA site managers and staff the ability to effectively and efficiently manage PBCHA's property.

PBCHA continues to review its maintenance function to ensure efficient operations, including assessing staffing and/or a centralized maintenance department, to determine the most efficient and cost-effective maintenance assistance within the public housing portfolio.

While continuing to face unprecedented challenges – severely limited affordable housing options, and an increased demand for affordable housing and homeless and elderly services – PBCHA continues to utilize increased funding and regulatory waivers to make decisions and take actions that will ensure that affordable housing remains available for current and future generations of Palm Beach County's most vulnerable population. PBCHA is exploring multiple strategies to include RAD, Section 18 Demolition & Disposition, increased density, voluntary conversion, mixed-finance rehabilitation or modernization of properties within its portfolio to face the numerous challenges in maintaining units and managing the expenses associated with operating housing within the current economic conditions. PBCHA is also utilizing data from its most recent Physical Needs Assessment (PNA) to determine priorities for repositioning and revitalization in order to transform its public housing inventory, develop new affordable housing opportunities, and promote healthy and stable communities.

The Rental Assistance Demonstration (RAD) Program was designed by HUD to assist in addressing the capital needs of public housing by providing PHAs with access to private sources of capital to repair and preserve its affordable housing assets. PBCHA has included within its Annual Plan regulatory requirements related to RAD for the conversion of public housing units to project-based assistance.

PBCHA will continue to use its current Capital Fund Grant monies, while seeking additional grant opportunities and alternate streams of revenue to improve management efficiencies for the physical improvement of its 428 public housing units; redevelopment activities; to engage in employee training and development that supports effective property management and program administration; develop and improve Section 3 opportunities as revised under Notice PIH 2022-10 Implementation of the Final Rule on Section 3 Regulations - 24 CFR Part 75; review and assess ways to improve energy efficiency; and address any work identified through REAC inspections and routine maintenance in order to receiving high REAC scores.

The Authority will conduct cost-effective operations to ensure financial viability, explore opportunities to improve efficiency and comply with program standards within its AMPs.

Substantial Deviation - Significant Amendment/Modification

PBCHA is required to provide its definition of “Substantial Deviation” or “Significant Amendment/Modification” and the basic criteria that it will use for determination. A Substantial Deviation from the Five-Year Plan is an overall change in the direction of the Housing Authority (HA) pertaining to its goals and objectives. The Palm Beach County Housing Authority will consider the following actions as a Substantial Deviation:

1. Results in reallocation of more than \$250,000 in agency funds;
2. An addition of new work items (excludes emergency work) not included in the Capital Fund Program (CFP) 5-Year Action Plan or Annual Statement(s) exceeding a cumulative amount of \$250,000 under the current fiscal year, or changes in use of the replacement reserves under the CFP.
3. Demolition and/or disposition activities, new or amended development plans, designation or conversion actions not currently identified in the 5-Year Plan or Annual Plan, or otherwise mandated by HUD.
4. Would create a mission, goal or objective that would fundamentally change the existing mission, goals, objectives or plans already identified by the Authority and would require formal approval of the Board of Commissioners;
5. Is a clear change in direction of funds mentioned above, exclusive of strategies that modifies agreed upon improvements to physical assets of the LIPH program outside of reductions in HUD funding or reallocations to future years;
6. In the event a federal statutory or regulatory change is made effective and in the opinion of the Authority, has either substantial programmatic or financial effects on the programs administered by the Authority; or
7. Creates substantial obligations or administrative burdens on the programs under administration at the start of the plan year. Such changes which are mandated and/or required may be adopted without prior notice to remain in compliance.

New program activities required or adopted to reflect changes in HUD regulations or as a result of a declared national or local emergency are exempted actions. In such cases, the administrative/ programmatic changes implemented will not be considered as a significant amendment or Modification to the Five-Year and Annual Plan.

Substantial Deviation - Significant Amendment/Modification cont'd

As part of the Rental Assistance Demonstration (RAD), (insert PHA name here) is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

- a. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;
- b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- c. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- d. Changes to the financing structure for each approved RAD conversion.

Any substantial deviation or significant amendment is subject to the following requirements:

- The PHA must consult with the Resident Advisory Board (RAB) (as defined in 24 CFR 903.13);
- The PHA must ensure consistency with the Consolidated Plan of the jurisdiction(s) (as defined in 24 CFR 903.15); and
- The PHA must provide for a review of the amendments/modifications by the public during a 45-day public review period (as defined in 24 CFR 903.17).
- The PHA may not adopt the amendment or modification until the PHA has duly called a meeting of its Board of Directors (or similar governing body). This meeting, at which the amendment or modification is adopted, must be open to the public.
- The PHA may not implement the amendment or modification until notification of the amendment or modification is provided to HUD and approved by HUD in accordance with HUD's plan review procedures (as defined at 24 CFR 903.23).

B.2 – New Activities

Hope VI or Choice Neighborhoods

PBCHA may apply for Choice Neighborhoods Initiative (CNI) Planning and Implementation Grants when the Notice of Funds Available is published for AMP 2 or AMP 6. PBCHA may partner with local government, a nonprofit, or for-profit developer to serve as the lead applicant for purposes of the CNI grant.

PBCHA may apply for Moving to Work (MTW) status, if eligible and should the application process open in 2022/2023.

Mixed Finance Modernization or Development/Demolition and/or Disposition

PBCHA will continue to explore opportunities to develop, revitalize, and preserve the existing housing portfolio and increase the availability of affordable housing units throughout the County. PBCHA may continue to collaborate with or designate additional development partners such as municipalities, nonprofit and public and private developers, and consider the issuance of bonds. PBCHA and/or its subsidiary entity(s) will utilize all available and appropriate funding/financing tools and strategies including the Capital Fund Program (CFP), Mixed Finance Development, Low Income Housing Tax Credits (LIHTC), Rental Assistance Demonstration (RAD) conversions, Project Based Vouchers (PBV), Public Facilities Investment Corporation (PFIC), Community Development Block Grant (CDBG), Bonds issuance, Institutional loans and other sources to redevelop Drexel House Apartments, Schall Landing, Seminole Estates, Dyson Circle, and its Scattered Site single-family homes. PBCHA will continue to evaluate and pursue where feasible the acquisition and/or development of ACC public housing units (within its Faircloth authority) as part of the overall development plan.

PBCHA completed an asset repositioning assessment in FY 22. PBCHA may submit a Section 18 disposition application to HUD requesting authorization to dispose of all single-family homes on the scattered sites development. If approved, these units may be sold to qualified residents, a qualified or affiliated non-profit, or sold to third parties in accordance with the strategy and HUD regulations.

Information on planned demolition and/or disposition efforts is provided in the following tables:

Table #1	Demolition/Disposition Activity Description
1a. Development name: Scattered Sites	
1b. Development (project) number: FL080000002	
2. Activity type: Demolition <input checked="" type="checkbox"/> (2 fire units)	
	Disposition <input checked="" type="checkbox"/>
3. Application status (select one)	
	Approved <input type="checkbox"/>
	Submitted, pending approval <input type="checkbox"/>
	Planned application <input checked="" type="checkbox"/>

4. Date application approved, submitted, or planned for submission: 2023-2024 planned submission
5. Number of units affected: 42
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 2023 b. Projected end date of activity: 2025

Designated Housing for Elderly and/or Disabled Families

The Palm Beach County Housing Authority (PBCHA) plans to designate certain public housing for occupancy only by elderly families as provided by Section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) in the upcoming fiscal year. PBCHA has operated certain public housing units as such, restricting occupancy to residents who are elderly only.

Designation of Public Housing Activity Description
1a. Development name: Drexel Apartments
1b. Development (project) number: FL0800000002
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date this designation approved, submitted, or planned for submission : 2022
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously approved Designation Plan
6. Number of units affected: 100
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development

Conversion of Public Housing to Tenant-Based Assistance

PBCHA will continue to analyze units in its portfolio to be converted where the conversion to project or tenant-based vouchers is economically beneficial and will increase housing opportunities. PBCHA's approach may include seeking additional funding authority in the voucher program to increase project-based opportunities at elderly and family public housing communities. PBCHA may also elect to utilize Low-Income Housing Tax Credit (LIHTC) equity and other resources to facilitate the conversion of the above-mentioned developments.

PBCHA may choose to utilize this option for Drexel Apartments, Schall Landing, Seminole Estates, Scattered Sites, and Dyson Circle.

Conversion of Public Housing to Project-Based Assistance under RAD

As a result of the asset repositioning assessment completed in FY 22, PBCHA may consider converting a portion of its Public Housing inventory to RAD and is currently studying the potential benefits of conversion for some or all its Public Housing properties.

Below, please find specific information related to the Public Housing Development(s) that may be selected for RAD:

Development #1

<u>Name of Public Housing Development:</u>	PIC Development ID:	Conversion Type:	Transfer of Assistance:
1. Drexel Apartments	FL080000002	PBRA	100
<u>Total Units:</u>	<u>Pre-RAD Units:</u>	<u>Post- RAD Unit Type:</u>	<u>2023 Capital Fund Allocation for Development:</u>
100	Senior	Senior	<u>\$0 (TBD)</u>
<u>Bedroom Type:</u>	<u>Number of Units Pre-Conversion:</u>	<u>Number of Units Post Conversion:</u>	<u>Change in Number of Units per bedroom type and Why:</u>
One Bedroom:	100	140	None
Complete			

Development #2

<u>Name of Public Housing Development:</u> 2. Schall Landing	PIC Development ID: FL080000002	Conversion Type: PBRA	Transfer of Assistance: 76
<u>Total Units:</u> 76	<u>Pre-RAD Units:</u> Family	<u>Post- RAD Unit Type:</u> Family	<u>2023 Capital Fund Allocation for Development:</u> <u>\$0 (TBD)</u>
<u>Bedroom Type:</u> Efficiency: One Bedroom: Two Bedroom: Three Bedroom: Four Bedroom:	<u>Number of Units Pre-Conversion:</u> 5 34 27 10	<u>Number of Units Post Conversion:</u> 130	<u>Change in Number of Units per bedroom type and Why:</u> Not Determined
Complete			

Development #3

<u>Name of Public Housing Development:</u> 3. Seminole Estates	PIC Development ID: FL080000002	Conversion Type: PBRA	Transfer of Assistance: 76
<u>Total Units:</u> 76	<u>Pre-RAD Units:</u> Family	<u>Post- RAD Unit Type:</u> Family	<u>2023 Capital Fund Allocation for Development:</u> <u>\$0 (TBD)</u>
<u>Bedroom Type:</u> Efficiency: One Bedroom: Two Bedroom: Three Bedroom: Four Bedroom:	<u>Number of Units Pre-Conversion:</u> 5 34 27 10	<u>Number of Units Post Conversion:</u> 141	<u>Change in Number of Units per bedroom type and Why:</u> Not Determined
Complete			

Development #4

<u>Name of Public Housing Development:</u>	PIC Development ID:	Conversion Type:	Transfer of Assistance:
4. Scattered Sites	FL080000002	PBRA	42
<u>Total Units:</u>	<u>Pre-RAD Units:</u>	<u>Post- RAD Unit Type:</u>	<u>2023 Capital Fund Allocation for Development:</u>
42	Family	Family	<u>\$0 (TBD)</u>
<u>Bedroom Type:</u>	<u>Number of Units Pre-Conversion:</u>	<u>Number of Units Post Conversion:</u>	<u>Change in Number of Units per bedroom type and Why:</u>
Efficiency:			
One Bedroom:	0		
Two Bedroom:	6		
Three Bedroom:	26		
Four Bedroom:	10	N/A	None
Complete			

Development #5

<u>Name of Public Housing Development:</u>	PIC Development ID:	Conversion Type:	Transfer of Assistance:
5. Dyson	FL080000006	PBRA	134
<u>Total Units:</u>	<u>Pre-RAD Units:</u>	<u>Post- RAD Unit Type:</u>	<u>2023 Capital Fund Allocation for Development:</u>
134	Family	Family	<u>\$0 (TBD)</u>
<u>Bedroom Type:</u>	<u>Number of Units Pre-Conversion:</u>	<u>Number of Units Post Conversion:</u>	<u>Change in Number of Units per bedroom type and Why:</u>
Efficiency:			
One Bedroom:	50		
Two Bedroom:	12		
Three Bedroom:	30		
Four Bedroom:	36		
Five Bedroom:	6	300	Not yet determined
Complete			



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PBV:

Development #1

<u>Name of Public Housing Development:</u> 1. Drexel Apartments	PIC Development ID: FL080000002	Conversion Type: PBV	Transfer of Assistance: 100
<u>Total Units:</u> 100	<u>Pre-RAD Units:</u> Senior	<u>Post- RAD Unit Type:</u> Senior	<u>2023 Capital Fund Allocation for Development:</u> <u>\$0 (TBD)</u>
<u>Bedroom Type:</u> One Bedroom:	<u>Number of Units Pre-Conversion:</u> 100	<u>Number of Units Post Conversion:</u> 140	<u>Change in Number of Units per bedroom type and Why:</u> None
Complete			

Development #2

<u>Name of Public Housing Development:</u> 2. Schall Landing	PIC Development ID: FL080000002	Conversion Type: PBV	Transfer of Assistance: 76
<u>Total Units:</u> 76	<u>Pre-RAD Units:</u> Family	<u>Post- RAD Unit Type:</u> Family	<u>2023 Capital Fund Allocation for Development:</u> <u>\$0 (TBD)</u>
<u>Bedroom Type:</u> Efficiency: One Bedroom: Two Bedroom: Three Bedroom: Four Bedroom:	<u>Number of Units Pre-Conversion:</u> 5 34 27 10	<u>Number of Units Post Conversion:</u> 130	<u>Change in Number of Units per bedroom type and Why:</u> Not Determined
Complete			

Development #3

<u>Name of Public Housing Development:</u> 3. Seminole Estates	PIC Development ID: FL080000002	Conversion Type: PBV	Transfer of Assistance: 76
<u>Total Units:</u> 76	<u>Pre-RAD Units:</u> Family	<u>Post- RAD Unit Type:</u> Family	<u>2023 Capital Fund Allocation for Development:</u> <u>\$0 (TBD)</u>
Bedroom Type: Efficiency: One Bedroom: Two Bedroom: Three Bedroom: Four Bedroom:	Number of Units Pre-Conversion: 5 34 27 10	Number of Units Post Conversion: 141	Change in Number of Units per bedroom type and Why: Not Determined
Complete			

Development #4

<u>Name of Public Housing Development:</u> 4. Scattered Sites	PIC Development ID: FL080000002	Conversion Type: PBV	Transfer of Assistance: 42
<u>Total Units:</u> 42	<u>Pre-RAD Units:</u> Family	<u>Post- RAD Unit Type:</u> Family	<u>2023 Capital Fund Allocation for Development:</u> <u>\$0 (TBD)</u>
Bedroom Type: Efficiency: One Bedroom: Two Bedroom: Three Bedroom: Four Bedroom:	Number of Units Pre-Conversion: 0 6 26 10	Number of Units Post Conversion: 42	Change in Number of Units per bedroom type and Why: Not Determined
Complete			

Resident Rights, Participation, Waiting List and Grievance Procedures

Exhibit A

**Resident Rights, Participation, Waiting List and Grievance
Procedures**

**Notice PIH-2019-23 Rev. 4 (HA) Rental Assistance Demonstration -
Final Implementation**

PBV Resident Rights and Participation

1. No Rescreening of Tenants upon Conversion

Pursuant to the RAD Statute, at conversion, current households cannot be excluded from occupancy at the Covered Project based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified in this Notice (e.g., rent phase-in provisions). For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, Section 8(o)(4) of the 1937 Act and 24 CFR § 982.201, concerning eligibility and targeting of tenants for initial occupancy, will not apply for current households. Once the grandfathered household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement. Further, so as to facilitate the right to return to the assisted property, HUD waives Section 8(o)(4) and 24 CFR § 982.201 to the extent necessary for this provision to apply to current public housing residents of the Converting Project that will reside in non-RAD PBV units or non-RAD PBRA units placed in a project that contain RAD PBV units or RAD PBRA units. Such families and such contract units will otherwise be subject to all requirements of the applicable program, specifically 24 CFR Part 983 for non-RAD PBV units and the PBRA requirements governing the applicable contract for non-RAD PBRA units.

2. Right to Return

See Section 1.4.A.5.b. and the RAD Fair Housing, Civil Rights, and Relocation Notice regarding a resident's right to return. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

3. Phase-in of Tenant Rent Increases

If, purely as a result of conversion, the amount a tenant would pay for rent and utilities under the PBV program (the tenant's TTP) would increase the tenant's TTP by more than the greater of 10% or \$25, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase-in period at three years, five years or a combination depending on circumstances and must communicate such policy in writing to affected residents. For example, a PHA may create a policy that uses a three-year phase-in for smaller increases in rent and a five-year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section "Calculated PBV TTP" refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1 (the first recertification following conversion), as illustrated below.

Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and all subsequent recertifications – Full Calculated PBV TTP

Five Year Phase in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP
- Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 5 AR and all subsequent recertifications – Full Calculated PBV TTP

Please Note: In either the three-year phase-in or the five-year phase-in, once the

Calculated PBV TTP is equal to or less than the previous TTP, the phase-in ends, and

tenants will pay full TTP from that point forward. MTW agencies must also implement a three or five-year phase-in for impacted residents but may alter the terms above as long as it establishes a written policy setting forth the alternative terms. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

4. Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs

Public Housing residents that are currently FSS participants will continue to participate in the PHA's FSS program. The PHA may continue to use any FSS funds already awarded to serve those FSS participants who live in units converted by RAD. At the completion of the FSS grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. If the PHA continues to run an FSS program that serves PH and/or HCV participants, the PHA will continue to be eligible (subject to NOFA requirements) to apply for FSS funding. Due to the program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the subsequent Appropriation Acts), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD. Palm Beach County Housing Authority has processed and approved 101 applicants to the FSS program as of this plan. Our goal is 109 for 2021.

However, PHAs should note that until provisions of the Economic Growth, Regulatory Relief, and Consumer Protection Act are implemented, there are certain FSS requirements (e.g., escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR part 984 (current, or as amended), the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 CFR 78100. Further, upon conversion to PBV, if the PHA no longer has a public housing program, funds already escrowed for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future ROSS-SC grants, nor will its residents be eligible to be served by future ROSS-SC grants, which, by statute, can only

serve public housing residents. At the completion of the ROSS-SC grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. Please note that ROSS-SC grantees may be a non-profit or local Resident Association and this consequence of a RAD conversion may impact those entities. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

5. Resident Participation and Funding

Residents of Covered Projects with assistance converted to PBV will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

6. Resident Procedural Rights

The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the required tenancy addendum (HUD Form 52530-c), as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

a. Termination Notification. HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD and to non-RAD PBV units located at the Covered Project. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter), the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall be:

i. A reasonable period of time, but not to exceed 30 days:

1. If the health or safety of other tenants, Project Owner, employees, or persons residing in the immediate vicinity of the premises is threatened; or
2. In the event of any drug-related or violent criminal activity or any felony conviction;

ii. Not less than 14 days in the case of nonpayment of rent; and

iii. Not less than 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

b. Grievance Process. Pursuant to requirements in the RAD Statute, HUD is establishing additional resident procedural rights to comply with section 6 of the Act.

For the termination of assistance and several other PHA determinations, PBV program rules

require the PHA to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:

In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(v), 40 an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.

For any hearing required under 24 CFR § 982.555(a)(1)(i)-(v), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).

For any additional hearings required under RAD, the Project Owner will perform the hearing. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or Contract Administrator.

The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi). Not less than 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

The Project Owner provides opportunity for an informal hearing before an eviction.

Current PBV program hearing procedures are outlined in the PHA's Section 8 Administrative Plan.

To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

7. Earned Income Disregard (EID)

Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in 24 CFR § 5.617(b) limiting EID to disabled persons is waived. The waiver, and resulting alternative

requirement, apply only to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants that move into the property following conversion or tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion due to loss of employment) is covered by this waiver. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

8. Jobs Plus (PBCHA was awarded a \$2,300,000 Jobs Plus Grant as of this plan)

Jobs Plus grantees awarded FY14 and future funds that convert the Jobs Plus target projects(s) under RAD will be able to finish out their Jobs Plus period of performance unless significant relocation and/or change in building occupancy is planned. If either is planned at the Jobs Plus target project(s), HUD may allow for a modification of the Jobs Plus work plan or may, at the Secretary's discretion, choose to end the Jobs Plus program at that project. If the program is continued, the Project Owner must agree to continue to implement the program according to HUD's program requirements. Jobs Plus target public housing projects must enroll public housing residents into the Jobs Plus rent incentive, JPEID, prior to conversion. Any resident of the Covered Project that had not enrolled prior to conversion is not eligible to enroll in JPEID but may utilize Jobs Plus services that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the Covered Project may voluntarily utilize Jobs Plus services that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion.

9. When Total Tenant Payment Exceeds Gross Rent

Under normal PBV rules, the PHA may select an occupied unit to be included under the PBV HAP Contract only if the unit's occupants are eligible for housing assistance payments (24 CFR § 983.53(c)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent) (24 CFR § 983.258). Since the rent limitation under this Section of the Notice may result in a family's TTP equaling or exceeding the gross rent for the unit, for residents living in the Converting Project prior to conversion and who will return to the Covered Project after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. During any period when the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice.⁴¹ In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP Contract. The PHA is required to process these individuals through the Form 50058 submodule in PIC.

To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this

provision.

Unless a waiver is requested and approved as described below, any new admission to the Covered Project must meet the eligibility requirements at 982.201 and require a subsidy payment at admission to the program, which means their TTP may not equal or exceed the gross rent for the unit at that time. Further, a PHA must remove a unit from the contract when no assistance has been paid for 180 days. If units are removed from the HAP contract because a new admission's TTP comes to equal or exceed the gross rent for the unit and if the project is fully assisted, HUD is imposing an alternative requirement that the PHA must reinstate the unit after the family has left the property. If the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR §983.207 or, where "floating units have been permitted, Section 1.6.B.10 of the Notice.

A PHA may request a waiver from HUD for the Covered Project in order to admit otherwise eligible families whose TTP exceeds gross rent and to allow the units those families occupy to remain under the HAP contract even if the PHA has not made a housing assistance payment for a family in 180 days.

For a Covered Project that consists of 100% RAD PBV units, the PHA must demonstrate that a waiver is necessary in order to avoid an undue concentration of poverty at the Covered Project. A PHA may evidence this by providing data showing, for example:

- how eligible income-certified applicants on the waiting list must be passed over because their incomes result in zero HAP at admission causing a higher concentration of poverty at the covered project; or
- how the income of newly admitted families is causing a markedly higher concentration of poverty than the PHA's non-RAD PBV projects.

The resulting impact on the property must be compared with the concentration of poverty at non-RAD PBV projects in the PHA's jurisdiction. If there are no non-RAD PBV projects in the PHA's jurisdiction, the PHA may alternatively demonstrate that the median income of families that could be admitted to the Covered Project is significantly lower than the median income of new admissions from the waiting list to the PHA's HCV program since the time of the RAD conversion.

For any other Covered Project, the PHA must demonstrate that the property contains specific units (e.g., units suitable for large families or accessible units) for which there are insufficient alternative housing opportunities.

If the waiver is approved, the new admission[s] families covered under the waiver are participants under the program and all of the family obligations and protections under RAD and PBV apply to the family, and the unit is subject to all program requirements. Such waiver requests should be submitted to the PIH Field Office in accordance with Notice PIH 2018-16.

10. Under-Occupied Unit

If a family is in an under-occupied unit under 24 CFR § 983.260 at the time of conversion, the family may remain in this unit until an appropriate-sized unit becomes available in the Covered

Project. When an appropriate sized unit becomes available in the Covered Project, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, 24 CFR § 983.260 is waived for current residents remaining or returning to the Covered Project. MTW agencies may not modify this requirement. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

PBV: Other Miscellaneous Provisions

1. Access to Records; including Requests for Information Related to Evaluation of Demonstration

PHAs and the Project Owner must cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. (Please see Appendix IV for reporting units in Form HUD-50058.)

2. Ongoing PHA Board Review of Operating Budget.

The Owner must submit to the administering PHA's Board the operating budget for the Covered Project annually. The PHA's Board must confirm that the Project Owner is making deposits into the Reserve for Replacement account in accordance with the RCC as well as assess the financial health of the Covered Project.

3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3). These sections have been moved to [1.4.A.13](#) and [1.4.A.14](#).

4. Establishment of Waiting List.

24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program wide, or site-based waiting list from which residents for the Covered Project will be admitted. These provisions shall apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:

- a. Transferring an existing site-based waiting list to a new site-based waiting list.
- b. Transferring an existing site-based waiting list to a PBV program-wide or HCV program-wide

waiting list.

- c.
- d. Transferring an existing community-wide public housing waiting list to a PBV program-wide or HCV program-wide waiting list, an option particularly relevant for PHAs converting their entire portfolio under RAD.
- e. Informing applicants on a community-wide public housing waiting list how to transfer their application to one or more newly created site-based waiting lists.

For any applicants on the public housing waiting list that are likely to be ineligible for admission to a Covered Project converting to PBV because the household's TTP is likely to exceed the RAD gross rent, the PHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the PHA's remaining public housing waiting list(s) or to another voucher waiting list, in addition to transferring such household to the waiting list for the Covered Project.

To the extent any wait list relies on the date and time of application, the applicants shall have priority on the wait list(s) to which their application was transferred in accordance with the date and time of their application to the original waiting list.

If the PHA is transferring assistance to another neighborhood and, as a result of the transfer of the waiting list, the applicant would only be eligible for a unit in a location which is materially different from the location to which the applicant applied, the PHA must notify applicants on the waiting list of the transfer of assistance, and on how they can apply for residency at other sites.

If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the Covered Project's initial waiting list.

In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing communitywide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate.

Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).

When using a site-based waiting list, PHAs should consider waiting list and transfer policies that expand opportunities for tenants seeking an emergency transfer under, or consistent with, the PHA's

Emergency Transfer Plan. This includes allowing for easier moves between assisted properties. To implement this provision, HUD is specifying alternative requirements for 24 CFR

§ 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the Covered Project in accordance with 24 CFR §983.251(c).

To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

A PHA must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations.

1. Mandatory Insurance Coverage

The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.

2. Future Refinancing

Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with long-term preservation of the Covered Project. With respect to any financing contemplated at the time of conversion (including any permanent financing which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC but HUD review of liens must be performed prior to execution.

7. Administrative Fees for Public Housing Conversions During the Year of Conversion

For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the “year of conversion”), RAD PBV projects will be funded with public housing funds. For example, if the project’s assistance converts effective July 1, 2015, the public housing ACC between the PHA and HUD will be amended to reflect the number of units under HAP Contract, but will be for zero dollars, and the RAD PBV HAP Contract will be funded with public housing money for July through December 2015. Since TBRA is not the source of funds, PHAs should not report leasing and expenses into VMS during this period, and PHAs will not receive section 8 administrative fee funding for converted units during this time. PHAs operating an HCV program typically receive administrative fees for units under a HAP Contract, consistent with recent appropriation act references to “section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Work Responsibility Act of 1998” and 24 CFR § 982.152(b). During the year of conversion mentioned in the preceding paragraph, these provisions are waived. PHAs will not receive Section 8 administrative fees for PBV RAD units during the year of conversion.

After the year of conversion, the Section 8 ACC will be amended to include Section 8 funding that corresponds to the units covered by the Section 8 ACC. At that time, the regular Section 8 administrative fee funding provisions will apply.

8. Choice-Mobility

One of the key features of the PBV program is the mobility component, which provides that if the family has elected to terminate the assisted lease at any time after the first year of occupancy in accordance with program requirements, the PHA must offer the family the opportunity for continued tenant based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance.

If as a result of participation in RAD a significant percentage of the PHA's HCV program becomes PBV assistance, it is possible for most or all of a PHA's turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility.

While HUD is committed to ensuring mobility remains a cornerstone of RAD policy, HUD recognizes that it remains important for the PHA to still be able to use tenant based vouchers to address the specific housing needs and priorities of the community. Therefore, HUD is establishing the following alternative requirement for PHAs where, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP Contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD: The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventory turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received.

In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA's administrative plan.

To effectuate this provision, HUD is providing an alternative requirement to Section 8(o)(13)(E) of the Act and 24 CFR § 983.261(c). Please note that this alternative requirement does not apply to PBVs entered into outside of the context of RAD. MTW agencies may not alter this requirement.

5. Reserve for Replacement.

The Project Owner shall establish and maintain a replacement reserve in an interest-bearing account to aid in funding extraordinary maintenance and repair and replacement of capital items in accordance with applicable regulations. The reserve must be built up to and maintained at a level determined by HUD to be sufficient to meet projected requirements. For FHA transactions, Replacement Reserves shall be maintained in accordance with the FHA Regulatory Agreement. For all other transactions, Replacement Reserves shall be maintained in a bank account or similar instrument, as approved by HUD, where funds will be held by the Project Owner or mortgagee and may be drawn from the reserve account and used subject to HUD guidelines.

6. Initial Certifications and Tenant Rent Calculations

The Contract Administrator uses the family's public housing tenant rent (reflected on line 10f of the family's most recent HUD Form 50058) at the date of the conversion to calculate the PBV HAP and tenant rent until the effective date of the earlier of the family's first regular or interim

recertification following the date of conversion. At the earlier of the family's first regular or interim recertification, the Contract Administrator will use the family's TTP based on the recertification and the HCV utility allowance (or the PBV site specific utility allowance, if applicable) to determine the PBV HAP and tenant rent.

This means that the family pays the same tenant rent as the family was paying under the public

housing program until the earlier of first regular or interim reexamination following conversion, at which point the normally applicable PBV calculation for the tenant rent becomes effective. (Under the PBV program, the monthly HAP is the rent to owner minus the tenant rent, and the tenant rent is the family TTP minus the utility allowance.) To facilitate the uniform treatment of residents and

units at a Covered Project, any non-RAD PBV units located in the same property as the Covered Project shall be subject to the terms of this provision. To effectuate this provision, HUD is waiving 24 CFR 5.601 and 983.3(c)(6)(iii).

Site Selection and Neighborhood Standards Review for Transfer of Assistance

1. For All
Transfers:

Description of the new site and how it is adequate for the needs of the tenants and is consistent with or furthers the goal of deconcentrating poverty.

The redevelopment of all Palm Beach County Housing Authority properties will tie into an overall plan and initiative to revitalize distressed neighborhoods, and spur additional redevelopment opportunities throughout qualifying areas within Palm Beach County. Once developed, the new and revitalized housing will provide enhanced amenities and improved living environments for program participants and surrounding communities.

2. If
transferring
assistance to
an area of
concentrated
poverty:

Various methods for demonstrating furthering the goals of deconcentrating poverty include:

- Mixed income developments;
- Development in a HUD Opportunity Zone, Enterprise Zone, Economic Community, Renewal Community or a Revitalization Zone, including any areas where current or future HOPE VI or Choice Neighborhoods Initiative developments exist.

3. If transferring
assistance to a
development
qualifying as new
construction in
an area of minority
concentration:

1) Sufficiency of comparable opportunities for minority families in the income to be served by the project outside areas of minority concentration;
Please examine 24 CFR §983.57(e) (3) (iv) & (v) to see more on comparable opportunities.

All proposed Palm Beach County Housing Authority redevelopment sites will satisfy Section IV and V.

2) If there is an overriding housing need, which includes whether this is an integral part of an overall redevelopment strategy in a revitalizing area. Please see 24 CFR §983.57(e)(3)(vi) for more information on overriding housing needs.

All proposed Palm Beach County Housing Authority redevelopment will have a positive impact on the entire County and help to revitalize distressed neighborhoods, and spur additional development opportunities, and support the Palm Beach County Consolidated Plan.

Relocation Plan

Palm Beach County Housing Authority would prepare a phased relocation plan designed to comply with all required guidelines and insure a smooth transition.

Significant Amendment Definition

As part of the Rental Assistance Demonstration (RAD), PBCHA is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds; Changes to the construction and rehabilitation plan for each approved RAD conversion; and Changes to the financing structure for each approved RAD conversion.

Non- Smoking Policies

On November 17, 2015, HUD published its Instituting Smoke-Free Public Housing proposed rule. This proposed rule would require each public housing agency (PHA) administering public housing to implement a smoke-free policy. Specifically, this rule proposes that no later than 18 months from the effective date of the final rule, each PHA must implement a policy prohibiting lit tobacco products in all living units, indoor common areas in public housing, and in PHA administrative office buildings (in brief, a smoke-free policy for all public housing indoor areas). The smoke-free policy must also extend to all outdoor areas up to 25 feet from the housing and administrative office buildings. HUD proposes implementation of smoke-free public housing to improve indoor air quality in the housing, benefit the health of public housing residents and PHA staff, reduce the risk of catastrophic fires, and lower overall

maintenance costs.

In accordance with the final rule, PBCHA amended its PHA Plan and ACOP to ensure compliance. As stated in **Notice PIH 2017-03**, PBCHA will “....design and implement a policy barring the use of prohibited tobacco products in all public housing living units, interior common areas and outdoor areas within 25 feet from public housing and administrative office buildings (collectively, “restricted areas”). This policy must be implemented by July 30, 2018. Instituting Smoke-Free Public Housing is considered a “Significant Amendment” to PBCHA’s PHA Plan and is therefore subject to the requirements identified in PBCHA’s definition of “Substantial Deviation – Significant Amendment /Modification” above. PBCHA has reviewed HUD materials, websites, toolkits and all other available resources to determine the steps necessary for compliance. PBCHA has and will continue to educate and engage its residents, employees, Board members, stakeholders and partners on the rule; review existing policies and lease for necessary revisions; will amend the tenant leases in accordance with 24 CFR 966.4 as necessary; solicit input; and continue to partner with local and state health departments and tobacco control organizations.

Project-Based Vouchers

The project-based voucher (PBV) program allows PHAs that already administer a tenant-based voucher program under an annual contributions contract (ACC) with HUD to take up to 20 percent of its voucher program budget authority and attach the funding to specific units rather than using it for tenant-based assistance [24 CFR 983.6]. PHAs may only operate a PBV program if doing so is consistent with the PHA’s Annual Plan, and the goal of deconcentrating poverty and expanding housing and economic opportunities [42 U.S.C. 1437f(o)(13)].

The Authority may operate a project-based voucher program that utilizes up to 621 vouchers (based on 20% of its voucher authority). The PBCHA is also allowed to project base an additional 310 vouchers (based on 10% of its voucher authority) for eligible exception categories for a total of 931 possible PB vouchers. PBCHA anticipates executing a HAP with the owner of the Lake Worth Towers senior housing development in 2023. One hundred twelve (112) vouchers will be allocated from HUD to the development, which was previously under a HUD Section 202 contract, and PBCHA has agreed to administer the vouchers. In addition, PBCHA will allocate 83 vouchers from its voucher authority to preserve affordable housing for 100% of the units at Lake Worth Towers. Accordingly, PBCHA will have 614 vouchers under Housing Assistance Payment (HAP) contracts as reflected below:

<u>Development Name</u>	<u>Development Address</u>	<u>Units under HAP</u>
Westgate Plaza Apartments	4150 Westgate Ave., WPB, FL 33409	80
Quiet Waters	306 SW 10th St., Belle Glade, FL 33430	93
Covenant Villas	600 Covenant Dr, Belle Glade, FL 33430	116
New South Bay Villas	845 Palm Beach Lakes Rd., South Bay, FL	130
Lake Worth Towers	1500 Lucerne Ave., Lake Worth, FL. 33460	<u>195</u>
Total Units Under HAP		<u>614</u>

PBCHA may decide to project-based vouchers above its voucher limit, if HUD publishes a notice making available PBV for HUD-VASH vouchers or other PBV special purpose vouchers or for a project that would provide affordable housing for low-income or homeless veterans or other eligible targeted populations.

Project-Based Vouchers cont'd

PBV assistance may be attached to existing housing or newly constructed or rehabilitated housing [24 CFR 983.52]. If PBV units are already selected for project-based assistance either under an agreement to enter into HAP Contract (AHAP) or a HAP contract, the PHA is not required to reduce the number of these units if the amount of budget authority is subsequently reduced. However, the PHA is responsible for determining the amount of budget authority that is available for project-based vouchers and ensuring that the amount of assistance that is attached to units is within the amounts available under the ACC, regardless of whether the PHA has vouchers available for project-basing [FR Notice 1/18/17].

Additional Project-Based Units [FR Notice 1/18/17; Notice PIH 2017-21] The PHA may project-base an additional 10 percent of its units above the 20 percent program limit. The units may be distributed among one, all, or a combination of the categories as long as the total number of units does not exceed the 10 percent cap. Units qualify under this exception if the units:

- Are specifically made available to house individuals and families that meet the definition of homeless under section 103 of the McKinney Vento Homeless Assistance Act (42 U.S.C. 11302) and contained in the Continuum of Care Interim Rule at 24 CFR 578.3.
- Are specifically made available to house families that are comprised of or include a veteran. - Veteran means an individual who has served in the United States Armed Forces.
- Provide supportive housing to persons with disabilities or elderly persons as defined in 24 CFR 5.403.
- Are located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five Year Estimates.

PHA Policy

The PHA will not set aside units above the 20 percent program limit.

The Authority plans to use some of its vouchers under the "Project Based Vouchers" ("PBV") option, as described at 24 CFR Part 983.51(b), as follows:

- PBCHA shall solicit proposals by using a Request for Proposals (RFP) to select proposals on a competitive basis in response to the PHA request. The PHA may not limit proposals to a single site or impose restrictions that explicitly or practically preclude owner submission of proposals for PBV housing on different sites. The criteria and procedures for such selections will be described in the RFP and in the PBCHA's HCVP (Section 8) Administrative Plan.

The Authority may also submit a proposal under an RFP for units in its public housing portfolio or a property it may acquire for this purpose. The use of PBVs is consistent with the overall PHA Plan, which is encouraging the development of affordable mixed-use, mixed-income housing particularly in consort with broader neighborhood revitalization efforts in projects throughout the County.

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

PBCHA's PBV criteria and selection procedures will propose the use of these resources in ways that facilitate achievement of its overall housing goals in general and the mobilization of potential relocation resources in particular, to address the housing needs of PBCHA families at developments slated to be

developed or redeveloped throughout the County.

PHA procedures for selecting PBV proposals shall be designed and operated to provide broad public notice of the opportunity to offer PBV proposals for consideration by the PHA. The public notice procedures may include publication of the public notice in a local newspaper of general circulation and other means designed and actually operated to provide broad public notice. The public notice of the PHA request for PBV proposals must specify the submission deadline. Detailed application and selection information must be provided at the request of interested parties. For the entire policy on project-based vouchers, please refer to the Section 8 Administrative Plan, Chapter 17, located on the PBCHA website: www.pbchafll.org.

Under the HUD Asset Management Model, some of PBCHA's developments may not be financially sustainable because insufficient Annual Contract Contribution (ACC) subsidy is received from HUD to support their operations. PBCHA is currently evaluating options for restructuring the properties; possibly seeking to convert these properties to project-based Section 8 communities.

Units with Approved Vacancies for Modernization

Due to extensive damage caused by fire damage, PBCHA has vacated 2 public housing single-family units at the Scattered Sites for repairs and renovation. As noted above, the two units at the scattered sites are also being considered for disposition/demolition. Additionally, periodically a public housing unit may be vacated for repairs due to a fire or other extensive damage.

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

PBCHA may consider submission of applications, where feasible, for the CFP Safety and Security Grant Program, Lead Based Paint Capital Fund Program, and Housing-related Hazard Capital Fund Program. As funds become available, PBCHA intends to explore all funding opportunities for additional capital fund monies and seek additional revenue sources as well as utilize available programs to address the severe backlog of unfunded capital needs of the public housing portfolio and ensure the long-term preservation of affordable housing in the Palm Beach County.

Property Management

PBCHA and/or its affiliate plans to engage in providing property management services for its related entities and/or third parties. These services shall include all aspects of the day-to-day operations of property management, including but not limited to screening and selecting tenants, completing lease forms, rent collections, repairs and maintenance, ensuring compliance with LIHTC, HOME, SHIP, HOPWA and/or other state or federally funded programs used in financing properties and preparing reports of operations for owners. PBCHA intends to engage owners of Low-Income Housing Tax Credit properties (including entities which may be partially owned or managed by PBCHA and/or its affiliate), properties owned by other Housing Authorities, municipalities, and private owners. PBCHA shall utilize compliance firms as necessary to assist with adherence to compliance for properties funded with LIHTC, HOME, SHIP, HOPWA or other funding sources with compliance requirements. The properly licensed staff has been or will be hired. PBCHA has or will obtain the appropriate state required licensing.



C.3 Civil Rights Certification

Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations, will be submitted by the PBCHA as an electronic attachment to the PHA Plan.

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B.3 – Progress Report

Goal/Action Plan Item		
Goal #1.	The PBCHA will take actions to ensure the implementation of strategic goals.	
R	Action Plan #1	Build synergy for strategic planning implementation through the engagement of the Board, Staff, Residents, and External Stakeholders.
H	Action Plan #2	Complete of the action plan templates with the required information. Project on hold
H	Action Plan #3	Provide master schedule of action plan implementation timelines. Delayed
H	Action Plan #4	Provide a Strategic Planning Balanced Scoreboard monitoring and tracking system for use by the Executive Director and Board.
R	Action Plan #5	Provide a PBCHA Business Plan for Sustainability.
R	Action Plan #6	Complete a Board Policies Manual.
H	Action Plan #7	Apply Balanced Scorecard to assess strategic planning implementation and overall agency progress.
Goal #2.	The PBCHA will bring clarity to its public image and agency profile through an expanded marketing and promotion of its new vision, mission, values, and goals, and will express how these strategic initiatives will improve the quality of life in Palm Beach County.	
Y	Action Plan #1	Form an Ad Hoc Marketing Committee comprised of Board, Staff, and the marketing consulting firm.
Y	Action Plan #2	Update and expend the website to provide transparency on the agency mission, programs, staff, portfolio, and strategic plan.
	Action Plan #3	Prepare a PowerPoint presentation that “tells the story” of PBCHA and its residents and develop TV Show to air on Channel 20.
Y	Action Plan #4	Complete a comprehensive Customer Satisfaction Survey to determine satisfaction levels, wants and needs.
Y	Action Plan #5	Develop a marketing culture, and employee marketing expectations.
Goal #3.	Human Resources Planning: The PBCHA will evaluate and refine staffing to meet the ongoing needs of the agency.	
R	Action Plan #1	Provide transparency and clarity on the PBCHA organization of its human resources.
✓	Action Plan #2	Review and update the human resources instruments and benefits.
✓	Action Plan #3	Complete a comprehensive organizational assessment of the PBCHA.
G	Action Plan #4	Provide effective advancement and training opportunities for professional growth.
✓	Action Plan #5	Provide for the continuity of operations during a natural or man-made disaster impacting on the office or residences.

Goal/Action Plan Item		
Goal #4.	County Stakeholders Engagement: The PBCHA will significantly expand its engagement with governmental, non-profit, for-profit, and foundation partners that share the vision, mission, and values of the agency.	
G	Action Plan #1	Engage PBCHA in key affordable housing planning processes in the County that will impact funding priorities.
✓	Action Plan #2	Prepare a PowerPoint overview on PBCHA that can be presented by Board, Staff, and Residents to key stakeholders.
✓	Action Plan #3	Complete Memorandum of Agreement with many of the key support services providers in Palm Beach County.
✓	Action Plan #4	Provide for E-Communications that will offer an additional option for marketing PBCHA programs and services.
H	Action Plan #5	Consider business model options for collaborating with other housing authorities in Palm Beach County.
Goal #5.	Support Services Linkages: The PBCHA will strengthen, and in some cases, formalize additional partnership agreements with key partners in Palm Beach County that can provide critical self-sufficiency and independent living support services.	
G	Action Plan #1	Identify and profile the current support service providers that are providing assistance to PBCHA residents.
Y	Action Plan #2	Identify and profile support service providers not currently assisting PBCHA residents.
✓	Action Plan #3	Apply for Resident Opportunity and Self-Sufficiency (ROSS) Grant.
G	Action Plan #4	Define communication linkages between providers, staff, and residents to monitor and evaluate support services.
Y	Action Plan #5	Implement some support services on-site in PBCHA developments.
G	Action Plan #6	Redefine the self-sufficiency and independent living goals, action plans, and processes.
H	Action Plan #7	Provide opportunities for resident-managed business services that support housing authority needs.
G	Action Plan #8	Provide information on FSS program progress.
Y	Action Plan #9	Increase opportunities for Section 3 residents.
Goal #6.	Housing Tenancy: The PBCHA will strive to reduce the length of tenancy of Public Housing residents and Housing Choice Voucher participants. The Housing Authority will posture themselves to be able to provide greater opportunities and motivation for residents to transition into market rate housing.	
Y	Action Plan #1	Formulate baseline information on tenancy lengths and track such information for future residents.
G	Action Plan #2	Restructure the family self-sufficiency program and services to be more effective and efficient.
G	Action Plan #3	Provide briefing materials for residents that set high expectations on housing tenancy transition.

Goal/Action Plan Item		
H	Action Plan #4	Revise the Administrative Plan and the ACOP to maximize opportunities for success in housing tenancy length reduction.
H	Action Plan #5	Build a collaborative network with governmental housing inspectors to better monitor and enforce landlord and resident lease expectations
Goal #7.	Portfolio Expansion: The PBCHA will launch multiple portfolio expansion development to respond to the affordable housing needs that are evidenced in Palm Beach County.	
<input checked="" type="checkbox"/>	Action Plan #1	Complete a comprehensive portfolio analysis of property value, finances, and physical condition.
Y	Action Plan #2	Form a Board Development Committee, Staff, and local development experts to review portfolio maintenance and expansion.
G	Action Plan #3	Expand the agency engagement at the County level impacting affordable housing planning and implementation.
Y	Action Plan #4	Ensure that all existing and future housing developments are linked to sustainable neighborhoods.
H	Action Plan #5	Utilize business models for evaluating the viability of existing and future developments.
G	Action Plan #6	Identify and pursue grants and funds leveraging opportunities that will expand affordable housing.

On Schedule

Activity Slippage Not Impacting Completion Date

Activity Slippage Impacting Completion Date

Project on Hold

Complete

G
Y
R
H
<input checked="" type="checkbox"/>

C.1 Resident Advisory Board (RAB) Comments

Comments received by the Resident Advisory Board have been added as applicable following the RAB meeting held on June 14, 2022. The PBCHA will also incorporate comments received during the Annual Plan public review period beginning May 6, 2022 through June 21, 2022 and the public hearing on June 21, 2022. Notice of all applicable dates were formally noticed in the Palm Beach Post.

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C.2 Certification by State and Local Officials

Form HUD 50077- ST- HCV-HP and 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, will be submitted by the PBCHA as an electronic attachment to the PHA Plan.

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Annual PHA Plan
Fiscal Year 2023

B.4 Capital Improvements

PBCHA'S 5-YEAR PLAN		APPROVED: FEBRUARY 3, 2023
CFG FY 2021	\$1,297,816	
CFG FY 2022	\$1,594,497	
CFG FY 2023	\$1,602,221	
CFG FY 2024	\$824,219 (estimate)	
CFG FY 2025	\$826,448 (estimate)	
Total	\$6,145,201	