

PALM BEACH COUNTY HOUSING AUTHORITY

Annual Plan

Fiscal Years 2020 - 2021





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Palm Beach County Housing Authority
 Annual PHA Plan
 Fiscal Year 2020 - 2021

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: 02/29/2016
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A.	PHA Information
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A.1 PHA Name: Palm Beach County Housing Authority (PBCHA)
 PHA Code: FL080
 PHA Type: Standard PHA Troubled PHA
 PHA Plan for Fiscal Year Beginning: (10/2020):
 PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
 Number of Public Housing (PH) Units 428 Number of Housing Choice Vouchers (HCVs) 2840
 Total Combined Units/Vouchers 3268
 PHA Plan Submission Type: Annual Submission Revised Annual Submission

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.

PBCHA's proposed 5 -Year Plan, Annual Plan, PHA Plan Elements, CFP 5-Year Action Plan and Public Hearing Information can be found at the following locations:

- 1) Palm Beach County Housing Authority Administrative Office, 3432 West 45th Street, West Palm Beach, FL 33407
- 2) Dyson Circle Apartments, 4695 N. Dyson Circle, West Palm Beach, FL 33415
- 3) Schall Landings Apartments, 2402 Schall Circle, West Palm Beach, FL 33417
- 4) Seminole Estates, 6388 Seminole Circle, Lantana, FL 33462
- 5) Drexel House Apartments, 1745 Drexel Road, West Palm Beach, FL 33417
- 6) Housing Authority Website: <http://www.pbchaf.org>
- 7) Resident Advisory Board (RAB) Members received an electronic and/or hard copy of all Draft Plans referenced above.

PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)

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
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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 checked="" type="checkbox"/> <input type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input 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 checked="" type="checkbox"/> <input type="checkbox"/> Substantial Deviation.</p> <p><input checked="" type="checkbox"/> <input 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>
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<p>B.2</p>	<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 checked="" type="checkbox"/> <input 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>(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>
<p>B.3</p>	<p>Civil Rights Certification.</p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>B.4</p>	<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"/></p> <p>(b) If yes, please describe:</p> <p>See Attachment A</p>



<p>B.5</p>	<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> <p style="text-align: center;">See Attachment</p>
<p>B.6</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></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.</p>
<p>B.7</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>B.8</p>	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C.</p>	<p>Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
<p>C.1</p>	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>See HUD Form - 50075.2 approved by HUD on 7/2020 (see attached)</p>



B.1 – Revision of PHA Plan Elements

The following plan elements have been revised by PBCHA:

Statement of Housing Needs and Strategy for Addressing Housing Needs

Housing Needs of Families on the Public Housing Waiting Lists as of August 31, 2020

Income Levels		
	# of Families	% of Total Families
Waiting List Total	2231	100
Extremely low income (<= 30 % AMI or federal poverty level)	1973	89
Very low income (>30% but <=50% AMI)	231	10
Low income (>50% but <80% AMI)	22	1
Families with children	11187	53
Elderly families	423	19
Families with Disabilities	278	12
Racial Distribution		
Race/ethnicity (White)	545	25
Race/ethnicity (Black)	1545	69
Race/ethnicity (Asian/Pacific Islander/Other)	141	6
Race/ethnicity (Hispanic)	406	18
Race/ethnicity (Non-Hispanic)	1825	82
Bedrooms Needed		
1 BR	1068	48
2 BR	807	36
3 BR	276	12
4 BR	67	3
5 BR	13	<1

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

How long has it been closed (# of months)? 23 months; Closed 9/2018.

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 Project Based Waiting Lists as of August 31, 2020

Income Levels								
	# Of Families				% Of Families			
	WG	QW	NV	CV	WG	QW	NV	CV
Waiting List Total	74	1419	8319	1980	100	100	100	100
Extremely Low Income	71	1257	7190	1704	96	86	86	86
Very Low Income	3	122	873	221	4	9	11	11
Low Income	0	33	197	46	0	2	2	2
Families With Children	2	481	4577	1188	3	34	55	60
Elderly	70	492	1210	224	95	35	15	11
Families With Disabilities	2	9	4	7	3	1	0	0
Racial Distribution								
Race White	30	616	2002	341	41	43	24	17
Race Black	20	750	6021	1597	27	53	72	81
Race Other	24	53	296	42	32	4	4	2
Ethnicity Hispanic	24	461	1647	305	32	32	20	15
Ethnicity Non-Hispanic	50	958	6672	1675	68	68	80	85
Bedrooms Needed								
1 BR	67	751	4993	360				
2 BR	7	354	1798	900				
3 BR		263	1227	601				
4 BR		44	283	107				
5 BR		7	18	12				

Abbreviation Key:
WG: Westgate
CV: Covenant Villas
NV: New South Bay Villas
QW: Quiet Waters



Housing Needs (continued)

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

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 - 17 months; Closed 3/15/2018
- Quiet Waters - 14 months; Closed 6/21/2018
- New South Bay Villas - 17 months; Closed 3/22/2019
- Westgate - 52 months; Closed 4/18/2016

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



Housing Needs of Families on the Housing Choice Voucher (HCVP) Waiting List as of August 31, 2020

Income Levels		
	# Of Families	% of Total Families
Waiting List Total	5904	100
Extremely low income (<= 30 % AMI or federal poverty level)	4991	85
Very low income (>30% but <=50% AMI)	741	13
Low income (>50% but <80% AMI)	125	2
Families with children	3183	54
Elderly families	807	14
Families with Disabilities	4	<1
Racial Distribution		
Race/ethnicity (White)	1367	23
Race/ethnicity (Black)	4297	73
Race/ethnicity (Asian/Pacific Islander/Other)	240	4
Race/ethnicity (Hispanic)	1084	18
Race/ethnicity (Non - Hispanic)	4820	82
Bedrooms Needed		
1 BR	0	0
2 BR	0	0
3 BR	0	0
4 BR	0	0
5 BR	0	0

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

How long has it been closed (# of months)? 17 months (closed 3/2019)

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 Persons With Aids (HOPWA) as of August 31, 2020

Income Levels		
	# Of Families	% of Total Families
Waiting List Total	178	100
Extremely low income (<= 30 % AMI or federal poverty level)	152	85
Very low income (>30% but <=50% AMI)	19	11
Low income (>50% but <80% AMI)	7	4
Families with children	45	25
Elderly families	19	11
Families with Disabilities	153	86
Racial Distribution		
Race/ethnicity (White)	45	25
Race/ethnicity (Black)	129	73
Race/ethnicity (Asian/Pacific Islander/Other)	4	2
Race/ethnicity (Hispanic)	17	10
Race/ethnicity (Non - Hispanic)	161	90
Bedrooms Needed		
1 BR	170	96
2 BR	6	3
3 BR	2	1
4 BR	0	0
5 BR	0	0

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

How long has it been closed (# of months)? 53 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



Housing Needs Assessment Demographics

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: 2015	% Change
Population	1,320,134	874,530	-34%
Households	508,520	329,250	-35%
Median Income	\$53,538	\$53,363	-0%

Table 5 – Housing Needs Assessment Demographics

Data Sources: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Number of Households Table	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households*	45,926	46,951	60,290	33,436	142,590
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 form 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 on 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	192,403	46%
1-unit, attached structure	39,445	10%
2-4 units	42,014	10%
5-19 units	49,717	12%
20 or more units	69,291	17%
Mobile Home, boats, RV, van, etc.	17,000	4%
Total	409,870	100%

Table 28 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

Unit Size by Tenure	Owners		Renters	
	Numbers	%	Number	%
No bedroom	760	0%	2,266	2%
1 bedroom	10,958	5%	18,023	19%
2 bedrooms	77,891	33%	42,184	46%
3 or more bedrooms	147,064	62%	30,183	33%
Total	236,673	100%	92,656	100%

Table 29 – Unit Size by Tenure

Data Source: 2011-2015 ACS



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: 2015	% Change
Median Home Value	278,500	204,700	-26%
Median Contract Rent	953	1,026	8%

Table 30 – Cost of Housing

Data Source: 2005- 2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	12,697	14.9%
\$500-999	37,674	44.2%
\$1000-1,499	23,516	27.6%
\$1,500-\$1,999	7,382	8.7%
\$2000 or more	3,950	4.6%
Total	85,215	100.0%

Table 31 – Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

% Units Affordable to Households earnings	Renter	Owner
30% HAMFI	4,152	No Data
50% HAMFI	14,313	31,501
80% HAMFI	52,685	69,441
100% HAMFI	No Data	95,269
Total	71,150	196,211

Table 32 – Housing Affordability

Data Source: 2011-2015 CHAS



Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	912	1,136	1,422	1,943	2,273
High HOME Rent	864	927	1,114	1,278	1,406
Low HOME Rent	673	721	866	1,000	1,116

Table 33 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Housing Market Analysis: - Condition of Housing

According to the 2013-2017 American Community Survey (ACS), Palm Beach County jurisdiction’s housing inventory consists of an estimated 418,315 housing units. The majority of the units (72.5%) were built after 1980, and the median age of all units is approximately 35 years old. According to the ACS, 337,043 of the units were occupied, while 81,272 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 pe room excluding bathrooms, porches, foyers, halls, or half-rooms.



- Sever 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.
- 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 financially feasible to rehabilitate.

Condition of Units	Owner- Occupied		Renter Occupied	
	Number	%	Number	%
With one selected condition	80,542	34%	50,293	54%
With two selected condition	1,852	1%	4,561	5%
With three selected condition	146	0%	244	0%
With four selected condition	0	0%	15	0%
No selected conditions	154,100	65%	37,480	40%
Total	236,640	100%	92,593	99%

Table 34 – Condition of Units

Data Source: 2011 – 2015 ACS

Risk of Lead-Based Paint Hazard	Owner- Occupied		Renter Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	78,753	33%	35,229	38%
Housing Units built before 1980 with children present	29,591	13%	15,996	17%

Table 36 – Risk of Lead Based Paint

Data Source: 2011- 2015 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.

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.



Strategy for Addressing Housing Needs cont'd

- 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 Family Self-Sufficiency 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.

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.



Strategy for Addressing Housing Needs cont'd

F. 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

- Funding constraints
- Staffing 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.



B1: 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** - in accordance with PIH 2019-26 removal of Work Preferences as a Public Housing Waiting List item and as a Lease Provision for Public Housing Buildings.
- **PH** – in accordance with PIH 2019-23 PBCHA is incorporating additional terminology for to comply with Section 6 of the Act for public housing projects converting assistance under RAD, that supplement notification requirements in regulations at 24 CFR § 880.607.
- **HCVP** – Added language for online publications and websites as acceptable media outlets for publication of opening and closing the waitlist. The PBCHA will provide public notice by publishing the opening of the waitlist in suitable media outlets including, but not limited to online publications/websites.
- **HCVP**– Added language requiring voucher extensions request(s) to be made in writing and an approval or denial decision must be provided to applicant.
- **HCVP** – Updated language for applicant notification of removal from the waitlist. Applicant’s notification letter may be sent by PBCHA in writing or virtually. If notification letter is returned to the PBCHA with no forwarding address, the family will be removed from the waiting list with no further notice.
- **HCVP** – Added use of local preferences for the HCVP waiting lists to include preference for Mainstream; Added targeted preference of Foster Youth Initiative Vouchers, Family Unification Program Vouchers, HCV Mobility Demonstration Vouchers and VASH Vouchers.
- **HCVP** – Added language within the entire document of the Administrative plan that households must report changes in writing in lieu of verbal notification.
- **HCVP** –Added language related to requests for reasonable accommodation for assistance animals, support animals and/or service animals in accordance with FHEO Notice: FHEO-2020-01.



B1: Revision of PHA Plan Elements cont'd

- **HCVP**- Updated language regarding removing agency's requirement to send an applicant notification of removal from the waitlist at the initial application address AND any alternate address provided by the applicant. Updated language that PBCHA will send notification of removal, only to the address provided at initial application.
- **HCVP** – In accordance with PIH Notice 2019-23, updated requirements for the RAD Project Based Voucher program in Section 18 of Administrative Plan.
- **HCVP** – Updated language regarding the percentage of authorized units allowable for PBV. PBCHA will operate a project-based voucher program using up to 20 percent of its authorized units for project-based assistance. PBCHA will allow the total PBV to exceed the 20% for circumstances authorized by HOTMA.
- **HCVP** – Updated language requiring inspections of PBV units from annually to biennially. In accordance with FR Notice 6/25/14, PBV properties will be inspected at least once every 24 months during the term of the HAP contract. Updated language that PBCHA will inspect on a biennial basis a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS. If more than 20 percent of the sample of inspected contract units in a building fail the initial inspection, the PBCHA must re-inspect 100 percent of the contract units in the building.
- **HCVP** – Updated project-based voucher's mandatory requirement to participate in supportive services in accordance with 24 CFR 983.257(c), FR Notice 11/24/08. If a family is living in a project-based unit that is excepted from the 25 percent per project cap on project-basing because of participation in a supportive services program (e.g., Family Self- Sufficiency), and the family fails to complete its supportive services requirement without good cause, such failure is grounds for lease termination by the owner.
- **HCVP** - Updated calculation method for Earned Income Disallowance (EID) for participants with disabilities who qualified prior to May 9, 2016. PBCHA will calculate EID using a baseline income for Participants and complete a calculation in the first and second year based upon an increase of earnings.
- **HCVP** –Updated language in criminal history termination decision that PBCHA will use the concept of the preponderance of the evidence as the standard for making all termination decisions. Preponderance of the evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not. Preponderance



B1: Revision of PHA Plan Elements cont'd

of the evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

- **HCVP**- Added language that informal reviews and hearings may be held remotely.
- **HCVP** – Updated student financial assistance language as set forth in Notice PIH 2015-21. Provides update on types of student income that may be excluded or included in annual income.
- **HCVP** - Added language requiring additional verification requirements of student full-time status. Expanded additional types of verification after initial certification of student status and exemption.

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. This notice remains in effect until amended, superseded, or rescinded. 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 provide 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 this revision to that Notice, HUD restates the waivers and alternative requirements established previously in Notice PIH 2020–05, provides additional waivers and alternative requirements, extends the periods of availability for previously established waivers and alternative requirements, and issues 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.pbchaf1.org



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.

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2019 grants)		
a) Public Housing Operating Fund	1,278,938	
b) Public Housing Operating Fund - CARES	199,307	
c) Public Housing Capital Fund	1,214,842	
d) Capital Fund Recovery Grant	-0-	
e) HOPE VI Revitalization	-0-	
f) HOPE VI Demolition	-0-	
g) Annual Contributions for Section 8 Tenant-Based Assistance	26,343,337	
h) Section 8 Tenant Based Assistance - CARES	730,429	
i) Public Housing Drug Elimination	-0-	
j) Resident Opportunity and Self-Sufficiency Grants	115,000	
k) Community Dev. Block Grant	-0-	City of Palm Beach County
l) HOME	-0-	
Other Federal Grants (list below)	-0-	
Mainstream Voucher Program (MS5)	1,253,834	
Mainstream Voucher Program (MS5) CARES	39,982	
Housing Opportunities for Persons With Aids (HOPWA)	2,811,095	
2. Prior Year Federal Grants (unobligated funds only) (list below)		
Replacement Housing	-0-	
CFP 2018	842,905	In accordance with application
CFP 2019	803,871	In accordance with application



Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
CFP 2018 – Emergency Health and Safety Grant	-0-	In accordance with application
3. Public Housing Dwelling Rental Income		
a) Rents	1,332,810	Operation of PHA sites
b) Other Tenant Charges	16,505	Operation of PHA sites
4. Other income (list below)		
HUD Held Cash Reserves	1,683,894	HCVP HAP
PH Reserves	1,102,768	Operation of PHA sites
PHA held HCVP Reserves	297,190	HCVP Administration
PHA held MS5 Reserves	141,038	HCVP Administration
HUD held MS5 Reserves	282,753	HCVP Administration
PHA held NSP Reserves	19,625	NSP Administration
5. Non-federal sources (list below)		
PH Non-Dwelling Income	21,930	Operation of PHA sites
HCVP Other Income	93,409	HCVP Administration
Insurance	459,844	Operation of PHA Sites
NSP Dwelling Rent	78,736	Operation of NSP sites
Total resources	41,164,042	



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

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 is 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 determining if a centralized maintenance department, would provide the agency a more efficient and cost-effective assistance within the public housing portfolio.

While continuing to face unprecedented challenges – funding shortages, limited affordable housing options, and an increased demand for affordable housing and homeless and elderly services – PBCHA continues 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, 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. Once completed, PBCHA will utilize data from its most recent Physical Needs Assessment to determine priorities for repositioning and revitalization in order to transform the 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; review and assess ways to improve energy efficiency; and address any work identified through REAC inspections and routine maintenance in order to continue 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

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 Neighborhood Grants when the Notice of Funds Available is published. More specifically PBCHA may submit applications for Choice Neighborhoods Initiative (CNI) Planning and Implementation Grants, for both AMP (6) and AMP (2) Developments in the coming year(s).

PBCHA may apply for Moving to Work (MTW) status, if eligible and should the application process open in 2019/2020.

Mixed Finance Modernization or Development

Palm Beach County Housing Authority is contemplating setting a goal to transform its entire public housing portfolio into mixed-income communities over the next 3-5 years, in an effort to reposition the agencies public housing assets into better performing developments that are competitive in the marketplace as well as improve their physical and social conditions.

For the last five years PBCHA's has been responsible for redeveloping challenged neighborhoods that have not been invested in and/or neglected for some time. PBCHA and/or its subsidiary entity(s) plans to seek all available development opportunities and either partner with other developers or self-develop properties using HUD's mixed-finance approach or other public/private financing options.

PBCHA envisions a range of options that will be employed to achieve its goal to transform its portfolio which may include but not be limited to: modernization of existing public housing units; demolition of selected units and construction of new units; introduction of market rate and ~~for sale units~~; acquisition, rehabilitation or ~~and~~ development of new units in, around and outside of PBCHA properties and throughout Palm Beach County; voluntarily conversion to project based assistance or tenant housing choice vouchers, and wholesale redevelopment of its public housing communities.

In the future, PBCHA may submit a mixed-finance application/proposal to HUD in order to pursue the construction of new public housing units using any accumulated Asset Repositioning funds leveraged with public and private sources.

PBCHA may also decide to accumulate future grant funding and use it for the potential redevelopment of PBCHA's other public housing communities and/or for other projects under the mixed-finance development approach. Additional acquisitions of vacant land or other existing rental properties, adjacent to current public housing sites, and or in nearby areas, may also be initiated, subject to submission and approval by HUD of the appropriate development proposals.



Mixed Finance Modernization or Development cont'd

Other mixed-finance transactions (via acquisition or new construction or both) may be proposed later in the Plan year commensurate with PBCHA's future Strategic Business Plan. Financing may include use of regular Capital Funds and/or HUD's Capital Fund Financing Program (CFFP). CFFP involves borrowing against future flow of annual Capital Funds.

PBCHA plans to pursue public housing development activities and may utilize the other subsidiary entities for development, financing, and the formation of a variety of ownership structures as well as utilize subsidiary entities for the operation of public and non-public housing programs.

The Authority may choose to use Capital Funds, Low Income Housing Tax Credits (LIHTC) and other public and private funds to redevelop Drexel House Apartments, Schall Landing, Seminole Estates, Dyson Circle, various Scattered Sites, as well as other family and elderly developments. PBCHA may choose to select master developers for some or all of these sites and would conduct a community engagement process to arrive at a master plan for redevelopment. PBCHA also may use Capital Funds and other funds to acquire and redevelop properties in and around its public housing communities as well as throughout Palm Beach County. In addition, PBCHA may utilize project-based vouchers for additional affordable housing initiatives, redevelopment projects, replacement housing options and relocation options for residents affected by redevelopment and disposition plans.

Demolition and/or Disposition

This section describes whether HUD-approved applications by PBCHA to demolish or dispose (sell) of public housing projects owned by PBCHA and subject to Annual Contributions Contracts (ACCs), or pending applications for demolition or disposition, have changed during the current plan year.

In such cases, PBCHA would be required to describe the housing and the number of affected units for which it will apply or has pending application(s) for demolition or disposition; and provide a projected timetable for the demolition or disposition. Information on planned and pending demolition and/or disposition efforts is provided in the following tables.

Additionally, PBCHA may submit a disposition and demolition application to HUD requesting authorization from HUD to allow PBCHA to dispose of all scattered site – single family houses. 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.



Demolition and/or Disposition cont'd

Table #1	Demolition/Disposition Activity Description
1a. Development name:	Drexel Apartments
1b. Development (project) number:	FL080000002
2. Activity type:	Demolition <input checked="" type="checkbox"/> 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"/>
	Date application approved, submitted, or planned for submission: 2020-2021 planned submission
5. Number of units affected:	100
6. Coverage of action (select one)	<input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity:	a. Actual or projected start date of activity: 2021 b. Projected end date of activity: 2023

Table #2	Demolition/Disposition Activity Description
1a. Development name:	Schall Landing
1b. Development (project) number:	FL080000002
2. Activity type:	Demolition <input checked="" type="checkbox"/> 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"/>
	Date application approved, submitted, or planned for submission: 2020-2021 planned submission
5. Number of units affected:	76
6. Coverage of action (select one)	<input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity:	a. Actual or projected start date of activity: 2021 b. Projected end date of activity: 2023



Demolition and/or Disposition cont'd

Table #3	Demolition/Disposition Activity Description
1a. Development name:	Seminole Estates
1b. Development (project) number:	FL080000002
2. Activity type:	Demolition <input checked="" type="checkbox"/> 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:	2020-2021 Planned Submission
5. Number of units affected:	76
6. Coverage of action (select one)	<input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity:	a. Actual or projected start date of activity: 2021 b. Projected end date of activity: 2023

Table #4	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:	2020-2021 Planned Submission
5. Number of units affected:	42
6. Coverage of action (select one)	<input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity:	a. Actual or projected start date of activity: 2021 b. Projected end date of activity: 2023



Demolition and/or Disposition cont'd

Table #5	Demolition/Disposition Activity Description
1a. Development name:	Dyson Circle Apartments
1b. Development (project) number:	FL080000006
2. Activity type:	Demolition <input checked="" type="checkbox"/> 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:	2020-2021 Planned Submission
5. Number of units affected:	134
6. Coverage of action (select one)	<input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity:	a. Actual or projected start date of activity: 2020 b. Projected end date of activity: 2023

Table #6	Demolition/Disposition Activity Description
1a. Development name:	Cherry Hill lots (vacant)
1b. Development (project) number:	FL080000002
2. Activity type:	Demolition <input type="checkbox"/> 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:	2020-2021 Planned Submission
5. Number of units affected:	44 vacant lots
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: 2020 b. Projected end date of activity: 2021



Designated Housing for Elderly and/or Disabled Families

The Palm Beach County Housing Authority (PBCHA) plans to continue 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: FL080000002
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 : 2021
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

This section describes, with respect to PBCHA-owned public housing: 1) any building or buildings (including project number and unit count) that the PHA is required to convert to tenant-based assistance or that the public housing agency plans to voluntarily convert; 2) the analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received under this chapter to be used for rental assistance or other housing assistance in connection with such conversion.

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

The Palm Beach County Housing Authority may choose to submit multiple applications under the RAD program for the conversion of existing public housing to Project Based Rental Assistance or Project Based Vouchers under the guidelines of **Notice PIH 2019-23, REV-4** and any successor Notices. Upon conversion to Project Based Rental Assistance or Project Based Vouchers, the Authority and/or newly established ownership will adopt the resident rights, participation, waiting list and grievance procedures listed in for conversions to PBV: Section 1.7.C & 1.7.D of **PIH Notice 2019-23, REV-4**.

These resident rights, participation, waiting list and grievance procedures are ~~attached to~~ contained within this notice. Additionally, the Palm Beach County Housing Authority is currently compliant with all fair housing and civil rights requirements and is not under a Voluntary Compliance Agreement.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing Palm Beach County Housing Authority with access to private and public debt and equity to address immediate and long-term capital needs through rehabilitation or new construction. HUD therefore expects that the majority of projects undergoing conversion of assistance through RAD will do at least some rehabilitation or reconstruction. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration.

Please find specific information below related to the Public Housing Development(s) selected for RAD on RAD Amendment #1, #2 and RAD Amendment #3

Rental Assistance Demonstration Amendment # 1



The Palm Beach Housing Authority may submit an application for Rental Assistance Demonstration (RAD). As a result, in correlation, the Palm Beach County Housing Authority may then convert to Project-Based Rental Assistance or Project Based Vouchers under the guidelines of **PIH Notice 2019-23, REV-4** and any successor Notices. Upon conversion to Project Based Vouchers, PBCHA will adopt the resident rights, participation, waiting list and grievance procedures listed in for conversions to PBV Section: 1.6.C & 1.6.D of **PIH Notice 2019-23, REV-4**.

These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. Additionally, the Palm Beach County Housing Authority certifies that it is currently compliant with all fair housing and civil rights and is not under a Voluntary Compliance Agreement.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing the Palm Beach County Housing Authority with access to private and public debt and equity to address immediate and long-term capital needs through rehabilitation or new construction. HUD therefore expects that the majority of projects undergoing conversion of assistance through RAD will do at least some rehabilitation or reconstruction. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration.

Below, please find specific information related to the Public Housing Development(s) 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>2020 Capital Fund Allocation for Development:</u>
100	Senior	Senior	<u>\$183,988</u>
Bedroom Type:	Number of Units Pre-Conversion:	Number of Units Post Conversion:	Change in Number of Units per bedroom type and Why:
One Bedroom:	100	100	None
Complete			

Development #2



<u>Name of Public Housing Development:</u> 1.Schall Landing	<u>PIC Development ID:</u> FL080000002	<u>Conversion Type:</u> PBRA	<u>Transfer of Assistance:</u> 76
<u>Total Units:</u> 76	<u>Pre-RAD Units:</u> Family	<u>Post- RAD Unit Type:</u> Family	<u>2020 Capital Fund Allocation for Development:</u> <u>\$139,767.00</u>
<u>Bedroom Type:</u> Efficiency: One Bedroom: Two Bedroom: Three Bedroom: Four Bedroom: Complete	<u>Number of Units Pre-Conversion:</u> 5 34 27 10	<u>Number of Units Post Conversion:</u> 76	<u>Change in Number of Units per bedroom type and Why:</u> Not Determined

Development #3

<u>Name of Public Housing Development:</u> 1.Seminole Estates	<u>PIC Development ID:</u> FL080000002	<u>Conversion Type:</u> PBRA	<u>Transfer of Assistance:</u> 76
<u>Total Units:</u> 76	<u>Pre-RAD Units:</u> Family	<u>Post- RAD Unit Type:</u> Family	<u>2020 Capital Fund Allocation for Development:</u> <u>\$139,767.00</u>
<u>Bedroom Type:</u> Efficiency: One Bedroom: Two Bedroom: Three Bedroom: Four Bedroom: Complete	<u>Number of Units Pre-Conversion:</u> 5 34 27 10	<u>Number of Units Post Conversion:</u> 76	<u>Change in Number of Units per bedroom type and Why:</u> Not Determined



Development #4

<u>Name of Public Housing Development:</u>	PIC Development ID:	Conversion Type:	Transfer of Assistance:
1. Scattered Sites	FL080000002	PBRA	42
<u>Total Units:</u>	<u>Pre-RAD Units:</u>	<u>Post- RAD Unit Type:</u>	<u>2020, Capital Fund Allocation for Development:</u>
42	Family	Family	\$77,385.00
<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: Two Bedroom: Three Bedroom: Four Bedroom:	0 6 26 10	42	Not Determined
Complete			

Development #5

<u>Name of Public Housing Development:</u>	PIC Development ID:	Conversion Type:	Transfer of Assistance:
1. Dyson Circle	FL080000006	PBV	134
<u>Total Units:</u>	<u>Pre-RAD Units:</u>	<u>Post- RAD Unit Type:</u>	<u>2020 Capital Fund Allocation for Development:</u>
134	Family	Family	\$248,740.00
<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: Two Bedroom: Three Bedroom: Four Bedroom:	50 12 30 36	134	Not Determined



Five Bedrooms	6		
Complete			

Development #1

<u>Name of Public Housing Development:</u>	<u>PIC Development ID:</u>	<u>Conversion Type:</u>	<u>Transfer of Assistance:</u>
1. Drexel Apartments	FL080000002	PBV	100
<u>Total Units:</u>	<u>Pre-RAD Units:</u>	<u>Post- RAD Unit Type:</u>	<u>Capital Fund Allocation of Development:</u>
100	Senior	Senior	<u>\$312,408.00</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	100	None
Complete			



Development #2

<u>Name of Public Housing Development:</u> 1.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>Capital Fund Allocation of Development:</u> \$312,408.00
Bedroom Type: Efficiency: One Bedroom: Two Bedroom: Three Bedroom: Four Bedroom: Complete	Number of Units Pre-Conversion: 5 34 27 10	Number of Units Post Conversion: 76	Change in Number of Units per bedroom type and Why: Not Determined

Development #3

<u>Name of Public Housing Development:</u> 1.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>Capital Fund Allocation of Development:</u> \$312,408.00
Bedroom Type: Efficiency: One Bedroom: Two Bedroom: Three Bedroom: Four Bedroom: Complete	Number of Units Pre-Conversion: 5 34 27 10	Number of Units Post Conversion: 76	Change in Number of Units per bedroom type and Why: Not Determined



Development #4

<u>Name of Public Housing Development:</u> 1. 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>Capital Fund Allocation of Development:</u> \$312,408.00
Bedroom Type: Efficiency: One Bedroom: Two Bedroom: Three Bedroom: Four Bedroom: Complete	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

Development #5

<u>Name of Public Housing Development:</u> 1. Dyson Circle	PIC Development ID: FL080000006	Conversion Type: PBV	Transfer of Assistance: 134
<u>Total Units:</u> 134	<u>Pre-RAD Units:</u> Family	<u>Post- RAD Unit Type:</u> Family	<u>Capital Fund Allocation of Development:</u> \$312,408.00
Bedroom Type: Efficiency: One Bedroom: Two Bedroom: Three Bedroom: Four Bedroom: Five Bedrooms Complete	Number of Units Pre-Conversion: 50 12 30 36 6	Number of Units Post Conversion: 134	Change in Number of Units per bedroom type and Why: Not Determined



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.

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 FR 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:



i. 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.

1. 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).

2. For any additional hearings required under RAD, the Project Owner will perform the hearing.

ii. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or Contract Administrator.

iii. 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).

iv. 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 not awarded a 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. 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.
- d. 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.

5. 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.

6. 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.

9. 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.

10. 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.

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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 range to be served by the project outside areas of minority concentration;
 - 2) 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), (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.



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 568 vouchers (based on 20% of its voucher authority). Currently 419 vouchers are 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
<u>New South Bay Villas</u>	845 Palm Beach Lakes Rd., South Bay, FL	<u>130</u>
<u>Total Units Under HAP</u>		<u>419</u>

Accordingly, 149 vouchers are available for utilization under the Project Based Voucher Program. PBCHA may decide to project-based vouchers above the 568 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.

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 (Agreement) 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 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 operate 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.



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

As funds become available, PBCHA intends to explore all opportunities for additional capital fund monies. PBCHA will continue to seek additional revenue sources and utilize available programs to address the severe capital needs within its aging housing stock and preserve affordable housing that is decent, safe and sanitary.



B.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.



B.5 – Progress Report

Goal/Action Plan Item		
Goal #1.	The PBCHA will take actions to ensure the implementation of strategic goals.	
	Action Plan #1	Build synergy for strategic planning implementation through the engagement of the Board, Staff, Residents, and External Stakeholders.
	Action Plan #2	Complete of the action plan templates with the required information.
	Action Plan #3	Provide master schedule of action plan implementation timelines.
	Action Plan #4	Provide a Strategic Planning Balanced Scoreboard monitoring and tracking system for use by the Executive Director and Board.
	Action Plan #5	Provide a PBCHA Business Plan for Sustainability.
	Action Plan #6	Complete a Board Policies Manual.
	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.	
	Action Plan #1	Form an Ad Hoc Marketing Committee comprised of Board, Staff, and the marketing consulting firm.
	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.
	Action Plan #4	Complete a comprehensive Customer Satisfaction Survey to determine satisfaction levels, wants and needs.
	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.	
	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.
	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.	
	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.
	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.	
	Action Plan #1	Identify and profile the current support service providers that are providing assistance to PBCHA residents.
	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.
	Action Plan #4	Define communication linkages between providers, staff, and residents to monitor and evaluate support services.
	Action Plan #5	Implement some support services on-site in PBCHA developments.
	Action Plan #6	Redefine the self-sufficiency and independent living goals, action plans, and processes.
	Action Plan #7	Provide opportunities for resident-managed business services that support housing authority needs.
	Action Plan #8	Provide information on FSS program progress.
	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.	
	Action Plan #1	Formulate baseline information on tenancy lengths and track such information for future residents.
	Action Plan #2	Restructure the family self-sufficiency program and services to be more effective and efficient.
	Action Plan #3	Provide briefing materials for residents that set high expectations on housing tenancy transition.



Goal/Action Plan Item

	Action Plan #4	Revise the Administrative Plan and the ACOP to maximize opportunities for success in housing tenancy length reduction.
	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.	
	Action Plan #1	Complete a comprehensive portfolio analysis of property value, finances, and physical condition.
	Action Plan #2	Form a Board Development Committee, Staff, and local development experts to review portfolio maintenance and expansion.
	Action Plan #3	Expand the agency engagement at the County level impacting affordable housing planning and implementation.
	Action Plan #4	Ensure that all existing and future housing developments are linked to sustainable neighborhoods.
	Action Plan #5	Utilize business models for evaluating the viability of existing and future developments.
	Action Plan #6	Identify and pursue grants and funds leveraging opportunities that will expand affordable housing.



B.6 Resident Advisory Board (RAB) Comments

Comments will be added after Resident Advisory Board Meeting scheduled for October 24, 2020.



B.7 Certification by State and Local Officials

Form HUD 50077 – ST, 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.



C.1 Capital Improvements

CFG FY 2018	-	\$1, 199,542
CFG FY2019		\$1,140, 221
CFG FY 2020	-	\$1,140, 000
CFG FY 2021	-	\$835,000 (estimate)
CFG FY 2022	-	\$835,000 (estimate)
CFG FY 2023	-	\$835,000 (estimate)
CFG FY 2023	-	\$835,000 (estimate)

Total

