



Housing Authority of the City of Hartford

ANNUAL PHA PLAN FOR FISCAL YEAR 2019 STANDARD PHA PLAN [CT003]

FOR HUD REVIEW

180 John D. Wardlaw Way
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Submitted by:
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Executive Summary

The purpose of Housing Authority of the City of Hartford's (HACH's) 5-Year PHA Plans and Annual PHA Plans are to provide a strategic planning framework for HACH management operations and capital planning with:

- Local accountability, and
- An easily identifiable source by which public housing residents, participants in the tenant-based assistance program, and other members of the public, may locate HACH's basic policies, rules, and requirements concerning HACH's operations, programs, and services

HACH last created and published a 5-Year PHA Plan in 2015. In the subsequent years, HACH has made various modifications to that 5-Year Plan each year with Annual PHA Plans. This Annual PHA Plan describes the additional changes to its 5-Year Plan that HACH is planning for 2019.

HACH's three primary interests in 2019 are:

- to expand its successful Housing Choice Voucher (HCV or Section 8) program;
- to continue to advance its low-income housing; and
- to continue to improve its policies, procedures, and training.

For its HCV program, HACH has seen an expansion of higher quality housing available to its voucher holders with its rapid adoption of small-area fair market rents (SAFMR). Embracing this change, Hartford's downtown units are increasingly within reach of HCV families. HACH has also been called upon by HUD to convert and administrate tenant-protection vouchers for two failing projects within Hartford. With the tuning of its HCV program, HACH will continue to make more and better opportunities available to Hartford's housing impaired families. This also includes HACH's continued use of Project-Based Housing Choice Vouchers (PBVs). In 2019, HACH will continue to encourage the construction of affordable housing projects by private developers. HACH will likely sign at least two Agreement to Enter into a Housing Assistance Payment (AHAP) contracts for PBVs in 2019, one for the third-phase of the Bowles Park state housing replacement project, Willow Creek, and one for the first phase of the Westbrook Village replacement project.

HACH will also focus on the future of its low-income public housing (LIPH) program. HACH recognizes the long-term risks of the current program's trajectory and hope to make changes to that trajectory so that the program can offer improved housing, more efficiently. To that end, HACH will investigate and pursue the conversion of its LIPH housing to a different funding model and vigorously improve its management of the housing stock remaining in the current program. In 2018, HACH submitted its LIPH portfolio for possible RAD conversion. HACH also hired a consultant to help it understand the opportunities for the LIPH housing stock and to help seize the better opportunities for sustainable subsidized housing.

In 2019, HACH will continue to focus on the improvement of its Management Assessment Sub-System (MASS) indicator, one component in HUD's rating system for HACH's Low-Income Public Housing (LIPH) program. In 2018, HACH made substantial changes in its approach to rent collection and unit turn-over. Those efforts will continue into 2019. HACH still targets HUD highest occupancy rate measure: 98% occupancy.

Also, in response to a recurring request from HACH's LIPH Resident Advisory Board (RAB), HACH will also expand its local elderly preference to the other two LIPH AMP-6 developments, Mary Mahoney Village and Smith Tower.

HACH has also made significant strides in improving its policies, procedures, and training in 2018 and will continue to expand on that effort. HACH recognizes that its SEMAP and PHAS scores will only improve as it improves its governance and management of its housing inventory and assets.

How to Read this Plan

This plan is organized around HUD form 50075-ST, Annual PHA Plan, for Standard Agencies. The contents of that form are based on the regulations found in Code of Federal Regulations, Title 24, Part 903 [24 CFR 903].

The sections in this Plan are numbered to correspond with the 50075. In each section, we've also included the regulation reference in brackets ('[]'), if any, and the language of the regulation for reference in *gold-colored, italicized type*.

Form HUD-50075-ST

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 HUDClips Form Accessed: 07/16/2018
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

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

Definitions.

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

A.	PHA Information.																				
A.1	<p>PHA Name: <u>Housing Authority of the City of Hartford</u> PHA Code: <u>CT003</u></p> <p>PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>1/2019</u></p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p style="padding-left: 20px;">Number of Public Housing (PH) Units: <u>1,076</u></p> <p style="padding-left: 20px;">Number of Housing Choice Vouchers (HCVs): <u>2,564</u></p> <p style="padding-left: 20px;">Total Combined Units/Vouchers: <u>3,640</u></p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p style="text-align: center;">See Section A.1 below.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 10%;">Participating PHAs</th> <th rowspan="2" style="width: 5%;">PHA Code</th> <th rowspan="2" style="width: 10%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 30%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 25%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 15%;">HCV</th> </tr> </thead> <tbody> <tr> <td style="padding: 2px;">Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td style="height: 30px;"></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:											
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		PH	HCV																		
Lead PHA:																					

B.	Annual Plan Elements
B.1	<p>Revision of PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA? Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input type="checkbox"/> <input checked="" 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 type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s): See Section B.1 below.</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review. See Section B.1 below.</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Project-Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input checked="" 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>See Section B.2 below.</p>
B.3	<p>Civil Rights Certification.</p> <p>Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>See Section B.3 below.</p>

B.4	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit? Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe: See Section B.4 below.</p>
B.5	<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> See Section B.5 below.
B.6	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan? Y N <input checked="" 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> See Section B.6 below.
B.7	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> See Section B.7 below.
B.8	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C.	<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>
C.1	<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> See Section C.1 below.

A. PHA Information

A.1 Locations Agency Plan Available for Inspection

HACH's FY 2019 Annual Plan is available for inspection at the following locations during regular office hours:

Housing Authority of the City of Hartford
180 John D. Wardlaw Way
Hartford, CT 06106
(Main Office: open to the public)

Mary Shepard Place
15 Pavilion Street
Hartford, CT 06120

Kent Apartments
188 Sigourney Street
Hartford, CT 06105

Betty Knox Apartments
141 Woodland Street
Hartford, CT 06105

Nelton Court Apartments
45 Alan Green Way
Hartford, CT 06120

[Percival C.] Smith Tower
80 Charter Oak Avenue
Hartford, CT 06106

Mary Mahoney Village
73 Vine Street
Hartford, CT 06105

HACH provides a copy of the FY 2019 Annual PHA Plan to each resident council, after Board approval.

In addition, this FY 2019 Annual PHA Plan is available on HACH's website: www.hartfordhousing.org.

B. Annual Plan Elements

B.1 Revision of PHA Plan Element

B.1(b) Describe revisions for each revised element

Statement of Housing Needs and Strategy for Addressing Housing Needs [§ 903.7(a)]

Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of

- (i) families with incomes below 30 percent of area median income (extremely low-income),
- (ii) elderly families and families with disabilities, and
- (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data.

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(1)) Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. (24 CFR §903.7(a)(2)(ii))

In its 2015 Consolidated Plan, the City of Hartford noted a significant shortage of affordable and available rental units for extremely low-income households. HACH believes that the City continues to experience this problem. HACH's housing-needs statement was updated in its 2018 Annual PHA Plan. No further revisions are included in this plan.

Deconcentration and Policies that Govern Eligibility, Selection, and Admissions [§ 903.7(b)]

A statement of the PHA's deconcentration and other policies that govern eligibility, selection, and admissions. This statement must describe the PHA's policies that govern resident or tenant eligibility, selection and admission. This statement also must describe any PHA admission preferences, and any occupancy policies that pertain to public housing units and housing units assisted under section 8(o) of the 1937 Act, as well as any unit assignment policies for public housing. This statement must include the following information:

- (1) Deconcentration Policy. The PHA's deconcentration policy applicable to public housing, as described in § 903.2(a).
- (2) Waiting List Procedures. The PHA's procedures for maintaining waiting lists for admission to the PHA's public housing developments. The statement must address any site-based waiting lists, as authorized by section 6(s) of the 1937 Act (42 U.S.C. 1437d(s)), for public housing. Section 6(s) of the 1937 Act permits PHAs to establish a system of site-based waiting lists for public housing that is consistent with all applicable civil rights and fair housing laws and regulations. Notwithstanding any other regulations, a PHA may adopt site-based waiting lists where:
 - (i) The PHA regularly submits required occupancy data to HUD's Multifamily Tenant Characteristics Systems (MTCS) in an accurate, complete and timely manner;
 - (ii) The system of site-based waiting lists provides for full disclosure to each applicant of any option available to the applicant in the selection of the development in which to reside,

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- including basic information about available sites (location, occupancy, number and size of accessible units, amenities such as day care, security, transportation and training programs) and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types (e.g., regular or accessible) at each site;
- (iii) Adoption of site-based waiting lists would not violate any court order or settlement agreement, or be inconsistent with a pending complaint brought by HUD;
 - (iv) The PHA includes reasonable measures to assure that adoption of site-based waiting lists is consistent with affirmatively furthering fair housing, such as reasonable marketing activities to attract applicants regardless of race or ethnicity;
 - (v) The PHA provides for review of its site-based waiting list policy to determine if the policy is consistent with civil rights laws and certifications through the following steps:
 - (A) As part of the submission of the Annual Plan, the PHA shall assess changes in racial, ethnic or disability-related tenant composition at each PHA site that may have occurred during the implementation of the site-based waiting list, based upon MTCS occupancy data that has been confirmed to be complete and accurate by an independent audit (which may be the annual independent audit) or is otherwise satisfactory to HUD;
 - (B) At least every three years the PHA uses independent testers or other means satisfactory to HUD, to assure that the site-based waiting list is not being implemented in a discriminatory manner, and that no patterns or practices of discrimination exist, and providing the results to HUD;
 - (C) Taking any steps necessary to remedy the problems surfaced during the review; and
 - (D) Taking the steps necessary to affirmatively further fair housing.
- (3) Other admissions policies. The PHA's admission policies that include any other PHA policies that govern eligibility, selection and admissions for the public housing (see part 960 of this title) and tenant-based assistance programs (see part 982, subpart E of this title). (The information requested on site-based waiting lists and deconcentration is applicable only to public housing.)

Deconcentration Policy

HACH also provides for deconcentration of poverty and income mixing by bringing higher income tenants into lower income projects. HACH's deconcentration policy was updated in its 2018 Annual PHA Plan. No further revisions are included in this plan.

Waiting List Procedures

HACH is expanding its preference for older persons (55+) in two additional developments. HACH's Resident Advisory Board has been asking for this change for some time. There is a substantial and growing need for housing for older persons in Hartford and HACH is responding to that change. HACH's elderly preference now covers all its developments in AMP-6; e.g., Betty Knox Apartment, Kent Apartments, Mary Mahoney, and Smith Tower. Each is largely composed of studios or one-bedroom units that are not conducive to family use. As a preference, HACH will not discriminate against those elderly with families (e.g., minor children, such as grandchildren), accepting them for the preference.

Financial Resources [§ 903.7(c)]

This statement must address the financial resources that are available to the PHA for the support of Federal public housing and tenant-based assistance programs administered by the PHA during the

plan year. The statement must include a listing, by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned uses for the resources.

This statement addresses the financial resources available to HACH for the support of low-income public housing and tenant-based assistance programs administered by HACH during 2019.

Financial Resources: Planned Sources and Uses

Sources	Approx. Planned \$	Planned Uses
1. Federal Grants (FY 2019 grants)		
Public Housing Operating Funds	\$ 4,725,000	PHA Operations
Public Housing Capital Fund	\$ 1,200,000	Capital Improvements
Public Housing Replacement Housing Factor (1 st and 2 nd Increments)	\$ -	Replacement Housing
Annual Contributions: HCV	\$ 18,077,640	Housing Assistance Payments and Administrative Fees
Veteran Affairs Supportive Housing Program (VASH)	\$ 1,083,337	Housing Assistance Payments and Administrative Fees (included in HCV grant)
Resident Opportunity and Self-Sufficiency Grants (ROSS)	\$ 164,000	Service Coordinators
2. Prior Year Federal Grants (unobligated funds only)		
FY 2017 Public Housing Capital Fund	\$ 500,000	Capital Improvements
3. Public Housing Dwelling Rental Income Rent	\$ 4,713,000	PHA Operations
4. Other Income		
Interest on Investments (LIPH)	\$ 300	PHA Operations
Interest on Investments (HCV)	\$ 80	HCV Assistance
Dividends/Insurance Proceeds		PHA Operations
5. Non-federal Sources		
Other (Space Rentals)		
Total:	\$ 30,463,357	

Rent Determination [§ 903.7(d)]

This statement must describe the PHA's basic discretionary policies that govern rents charged for public housing units, applicable flat rents, and the rental contributions of families receiving tenant-based assistance. For tenant-based assistance, this statement also shall cover any discretionary minimum tenant rents and payment standard policies.

In each HACH housing program, a family's income determines eligibility for assistance and is also used to calculate the family's rent payment. HACH uses the policies and methods described in ACOP and its Admin Plan, as well as HUD regulations, to ensure that only eligible families receive assistance and that no family pays more or less than its obligation under the regulations. HACH's rent determination policies were updated in its 2018 Annual PHA Plan. No further revisions are included in this plan.

Operations and Management [§ 903.7(e)]

A statement of the PHA's operation and management.

- (1) This statement must list the PHA's rules, standards, and policies that govern maintenance and management of housing owned, assisted, or operated by the PHA.
- (2) The policies listed in this statement must include a description of any measures necessary for the prevention or eradication of pest infestation. Pest infestation includes cockroach infestation.
- (3) This statement must include a description of PHA management organization, and a listing of the programs administered by the PHA.
- (4) The information requested on a PHA's rules, standards and policies regarding management and maintenance of housing applies only to public housing. The information requested on PHA program management and listing of administered programs applies to public housing and tenant-based assistance.

Below is a summary of the changes planned for 2019 for both HACH's Housing Choice Voucher (HCV or Section 8) program and its Low-Income Public Housing (LIPH) program.

Changes to Housing Choice Voucher Administrative Plan

HACH's HCV program is administered with policy and procedures found in its Administration Plan (Admin Plan). The following is a summary of the Admin Plan changes for 2019:

- Local Admission Preferences

HACH is changing two preferences for 2019:

- Removing Preference for Displacement from HACH-Owned Unit undergoing Redevelopment

HACH created this preference to accommodate its redevelopment of Westbrook Village and Bowles Park. Since all the families will be moved out of those old developments by the end of the year, this preference won't be needed next year. HACH is therefore removing it.

- Adding Involuntary Displacement from HACH-Owned Development

HACH has had several LIPH developments out-of-commission because of fire and lead. It has been a substantial burden to both the displaced families and HACH to house those

families in temporary housing. Therefore, HACH will add a preference so that if multiple families are displaced from a PHA-owned development because fire, flooding, etc., and if HACH determines it will take too long to find replacement housing for those families, then HACH may offer the family an HCV vouchers.

- Initial Voucher Term

HACH is expanding the initial voucher term and extensions to 120 days, by adding a second automatic extension. This expands the time to locate a unit from 90 days to 120 days, which is more in line with the time it takes the 90th-percentile family to find suitable housing. To provide tracking and encouragement, HACH requires the applicant family to check in at 60 and 90 days.

- HAP Contract Termination and New Vouchers

HACH will give a family in a unit with a terminated HAP (not due to a family's action) a new voucher and require that the family move within the normal voucher rules, e.g., 120 days.

- Return of Documents

HACH is adding a blanket statement to its policy, stating that all documents are due within 10 business days of HACH's request for the document, unless otherwise noted in the policy.

HACH is implementing this technical correction because it has discovered too many places in the Admin Plan where the amount of time a tenant or applicant gets to return a document wasn't stated, delaying administration. This change permits HACH to take more immediate corrective action.

The policy language for each of the above changes to HACH's Administrative Plan for 2019, which can be see here: http://www.hartfordhousing.org/residents/agency_plan_online_documents/index.php#107

Changes to the LIPH Admissions and Continued Occupancy Policy

HACH's LIPH program is administered with policy and procedures found in its Admissions and Continued Occupancy Plan (ACOP). The following is a summary of the ACOP changes for 2019:

- HACH is changing two local admission preferences this year:

- Expanding Preference of 55 years of age and older to Mary Mahoney and Smith Tower

Currently, there is a preference for families with a head-of-household or co-head/spouse who is 55 years or older (regardless of any other familial status – meaning kids and grandkids are okay). HACH's implementation of a similar preference for Betty Knox and Kent Apartments has worked as expected, so HACH is expanding the admissions preference to cover Mary Mahoney Village and Smith Tower, as well.

- Removing Preference for Involuntary Displacement from HACH-Owned Unit

HACH created this preference to accommodate its redevelopment of Westbrook Village and Bowles Park. Since all the families will be moved out of those old developments by the end of 2018, this preference won't be needed next year. HACH will therefore remove it.

- Return of Documents

HACH is adding a blanket statement to its policy, stating that all documents are due within 10 business days of HACH's request for the document, unless otherwise noted in the policy.

HACH is implementing this technical correction because it has discovered too many places in the Admin Plan where the amount of time a tenant or applicant gets to return a document wasn't stated, delaying administration. This change permits HACH to take more immediate corrective action.

- Repayment Agreements

- Must Pay (or Agree to Pay) Debts Owed to HACH for Continued Assistance

HACH is expanding its current repayment policy.

In the past, this policy was implied, but never stated in HACH's ACOP. This proposed change will make it clear. The proposed change also allows HACH to terminate the tenancy (evict) families that refuse to sign repayment agreements.

HACH is also modifying to the terms of repayment agreements. The current policy requires that a family pay 10% of the amount owed as a down payment and then pay 10% of the family's adjusted gross income (AGI) per month, over 18 months. If the repayment wouldn't fit into this schedule, HACH could terminate the family's tenancy. HACH is extending the repayment period from 18 months to 48 months.

A family's failure to pay on a repayment agreement was and is still a lease violation.

- Limiting Repayment Agreements

HACH is implementing two new rules:

- Three-strikes over the past 6 years, then out (eviction). HACH has too many repeat offenders of its income reporting policy. This change lets HACH terminate serial offenders of HACH's income-reporting policies.
- Repayments in court if NTQ issued. HACH cannot offer program-based repayment plans if the family is being evicted. This is a clarifying statement.

- Repayment Due

HACH is proposing to alter timing for when repayment plan payments are due. HACH proposes changing due date to match rent payments, which will be the first of month, regardless of holiday. If a family fails to pay, then HACH will issue a Kapa Notice.

- Notice period for rent increase dropped from 30 to 15 days

Paperwork delays are making it difficult for HACH to meet HUD deadlines. Therefore, HACH will reduce the notice period of an increase in rent due to an interim reexamination of the household from 30 days to 15 days. In practice, because the rent doesn't adjust until the beginning of the next month, on average, most tenants will get about 30 days' notice (though this is still 15 days less than the current average of 45 days).

For example: if HACH's rent increase notice is dated the 16th of month, then tenant has 45 days until new rent is effective. But, if HACH's rent increase notice is issued on 15th of the month, then tenant has only 15 days' notice (unless it's February!)

-
- Persistently over-income families must pay market rent
HUD now requires that families that are over-income for a period of two years or more pay the fair market rent for their unit.

If the family's income drops, the family may request a re-examination of the family's income, which may lower the family's rent and restart the PHA's two-year over-income observation period.

- Waiting List Purge
HACH will change in its waiting list purge policy. Currently, HACH must update all families on the waiting list whenever it does an update. HACH will add the flexibility to purge only a portion of the waiting list necessary to ensure that forecast need for applicants is met with current and timely information on the applicant.

In practice, this proposed change permits HACH to update the entire waiting list or any portion of the waiting list, including, for example, the first 100 applicants, applicants requiring a specific unit size, applicants requiring ADA units, applicants with specific preferences, etc.

The policy language for each of the above changes to HACH's ACOP for 2019, which can be see here: http://www.hartfordhousing.org/residents/agency_plan_online_documents/index.php#107

Changes to the LIPH Tenant Lease

The following is a summary of the LIPH Tenant Lease changes for 2019:

- Technical changes to permit easier administration of the lease.

Changes to LIPH House Rules and a new Resident Services Fee Schedule

HACH has no LIPH House Rule changes for 2019.

Prevention or Eradication of Pest Infestation

HACH is continuing its extermination procedures into 2019.

Description of HACH's Management Organization

HACH is governed by a board of five Commissioners, all appointed by the Mayor of the City of Hartford, one of which must be a tenant of the Authority. Appointed by and reporting to the Board of Commissioners, and providing day-to-day oversight, is an Executive Director. Reporting to the Executive Director are the following:

- Chief Financial Officer
- Director of Human Resources
- General Counsel/Chief Procurement Officer
- Deputy Executive Director, Real Estate Development & Capital Improvements (for LIPH)
- Occupancy Supervisor (for LIPH)
- Property Manager Supervisor (for LIPH)
- Housing Choice Voucher Program (HCVP) Coordinator
- Community Liaison Officer

In 2017, HACH began a process of strengthening its operating policies, processes, procedures, and training. In 2019, HACH plans to:

- Update its policies with acquired experience and best practices

-
- Create and update more procedures
 - Create and expanding training opportunities

Programs Administered by HACH

HACH administers the following programs:

- Low-Income Public Housing (LIPH)
- Housing Choice Voucher (Tenant-based)
- Housing Choice Voucher (Project-based)

Grievance Procedures [§ 903.7(f)]

This statement describes the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. These procedures include public housing grievance procedures and tenant-based assistance informal review procedures for applicants and hearing procedures for participants.

LIPH

HUD's grievance regulations exist to provide its tenant with due process when faced with termination of tenancy or eviction. HACH is not proposing any changes to its grievance policy other than non-material technical corrections and clarifications.

HCV

HACH's HCV informal hearing policy can be found in HACH's Admin Plan. No changes to the HCV Informal Hearing policy and procedures are planned other than non-material technical corrections and clarifications.

Homeownership Programs [§ 903.7(k)]

A statement of homeownership programs administered by the PHA.

(1) This statement describes:

- (i) Any homeownership programs administered by the PHA under section 8(y) of the 1937 Act (42 U.S.C. 1437f(y));
- (ii) Any homeownership programs administered by the PHA under an approved section 5(h) homeownership program (42 U.S.C. 1437c(h));
- (iii) Any approved HOPE I program (42 U.S.C. 1437aaa); or
- (iv) Any homeownership programs for which the PHA has applied to administer or will apply to administer under section 5(h), the HOPE I program, or section 32 of the 1937 Act (42 U.S.C. 1437z-4).

(2) The application and approval process for homeownership under the programs described in paragraph (k) of this section, apart from the section 8(y) homeownership program, are separate processes. Approval of the PHA Plan does not constitute approval of these activities.

LIPH

HACH is encouraging the construction of affordable home-ownership units as part of its redevelopment partnership at Chester B. Bowles Park (now Willow Creek), those units should be available in 2019.

Otherwise, HACH does not have any plans for home ownership in 2019.

HCV

HACH has determined that it does not have the capacity to administrate an HCV Homeownership program. This program will not be supported until that capacity is created.

Community Service and Self-Sufficiency Programs [§ 903.7(l)]

A statement of the PHA's community service and self-sufficiency programs.

(1) This statement describes:

- (i) Any PHA programs relating to services and amenities coordinated, promoted or provided by the PHA for assisted families, including programs provided or offered as a result of the PHA's partnership with other entities;
- (ii) Any PHA programs coordinated, promoted or provided by the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs provided or offered as a result of the PHA's partnerships with other entities, and activities under section 3 of the Housing and Community Development Act of 1968 and under requirements for the Family Self-Sufficiency Program and others. The description of programs offered shall include the program's size (including required and actual size of the Family Self-Sufficiency program) and means of allocating assistance to households.
- (iii) How the PHA will comply with the requirements of section 12(c) and (d) of the 1937 Act (42 U.S.C. 1437j(c) and (d)). These statutory provisions relate to community service by public housing residents and treatment of income changes in public housing and tenant-based assistance recipients resulting from welfare program requirements. PHAs must address any cooperation agreements, as described in section 12(d)(7) of the 1937 Act (42 U.S.C. 1437j(d)(7)), that the PHA has entered into or plans to enter into.

(2) The information required by paragraph (l) of this section is applicable to both public housing and tenant-based assistance, except that the information regarding the PHA's compliance with the community service requirement applies only to public housing.

HACH's Community Service and Self-Sufficiency Programs are unchanged for 2019. For a description of the program, please refer to the ACOP and Admin Plan. In general, HACH promotes self-sufficiency and asset development of assisted households by:

- Providing or attracting supportive services to improve residents' employability,
- Developing partnerships with community agencies to provide educational and training opportunities for residents, and
- Continuing to provide or attract supportive services to increase independence for the elderly or families with disabilities.

Safety and Crime Prevention [§ 903.7(m)]

Public Housing Safety and Crime Prevention [§ 903.7(m)(1)&(2)]

A statement of the PHA's safety and crime prevention measures. With respect to public housing only, this statement describes the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents that it serves. The plan for safety and crime prevention must be established in consultation with the police officer or officers in command of the appropriate precinct or police departments. The plan also must provide, on a development-by-development or jurisdiction wide-basis, the measures necessary to ensure the safety of public housing residents.

The statement regarding the PHA's safety and crime prevention plan must include the following information:

- (i) A description of the need for measures to ensure the safety of public housing residents;
- (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and
- (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities.

HACH is committed to ensuring the safety and well-being of its residents. It has forged cooperative relationships with local law enforcement and has enacted programs and policies to achieve this goal. HACH's safety and crime prevention statement was updated in its 2018 Annual PHA Plan. No further revisions are included in this plan.

Dating Violence, Sexual Assault, and Stalking Prevention Programs [§ 903.7(m)(5)]

A statement of any domestic violence, dating violence, sexual assault, and stalking prevention programs:

- (i) A description of any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking;
- (ii) Any activities, services, or programs provided or offered by a PHA that help child and adult victims of domestic violence, dating violence, sexual assault, or stalking to obtain or maintain housing; and
- (iii) Any activities, services, or programs provided or offered by a PHA to prevent domestic violence, dating violence, sexual assault, or stalking, or to enhance victim safety in assisted families.

The Violence against Women Reauthorization Act of 2013 (VAWA) provides special protections for victims of domestic violence, dating violence, sexual assault, and stalking, who are applying for or receiving assistance under each of HACH's programs. HACH's dating violence, sexual assault, and stalking prevention statement was updated in its 2018 Annual PHA Plan. No further revisions are included in this plan.

Pet Policy [§ 903.7(n)]

A statement of the PHA's policies and rules regarding ownership of pets in public housing. This statement describes the PHA's policies and requirements pertaining to the ownership of pets in public housing. The policies must be in accordance with section 31 of the 1937 Act (42 U.S.C. 1437a-3).

HACH's Pet Policy establishes clear guidelines for ownership of pets and reasonable rules governing the keeping of common household pets. HACH's Pet Policy is found in the Chapter 10 of the ACOP. HACH's pet policy statement was summarized in its 2018 Annual PHA Plan. No further revisions are included in this plan.

Asset Management [§ 903.7(q)]

To the extent not covered by other components of the PHA Annual Plan, this statement describes how the PHA will carry out its asset management functions with respect to the PHA's public housing inventory, including how the PHA will plan for long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory.

HACH continues to explore all opportunities to either capitalize its federal assets within program parameters or monetize non-dwelling assets for the benefit of its resident population.

Substantial Deviation [§ 903.7(r)(2)(I)]

A PHA must identify the basic criteria the PHA will use for determining:

- (i) A substantial deviation from its 5-Year Plan; and

A Substantial Deviation from its 5-Year Plan and Annual Plan means a discretionary HACH action that is a material deviation from the mission, objectives, or plans of the agency.

A Substantial Deviation from its 5-Year Plan and Annual Plan includes HACH actions:

- Outside the mission, objectives, or plans of the agency that require formal approval by the Board of Commissioners

A Substantial Deviation from its 5-Year Plan and Annual Plan does not include HACH actions (not an exhaustive list):

- Resulting from funding constraints
- Taken to reflect HUD or other federal agency mandates, regulations, or directives
- That deviate from established processes or procedures (e.g., process or procedural actions that remain compliant with HACH policy)
- That are not specifically governed by HACH's PHA 5-Year and Annual Plan, or required PHA Plan elements
- That transfer work projects from one grant year to another in the Capital Fund Program (fungibility) included in the approved Capital Fund Program 5-Year Action Plan
- That transfer funds in the Capital Fund Program from one line-item to another within the same grant year budget
- To perform work projects funded by the Capital Fund Program not included in the 5-Year Action Plan that have been recognized by the Board of Commissioners to be emergencies
- Taken to implement a Rental Assistance Demonstration (RAD) program

Significant Amendment or Modification [§ 903.7(r)(2)(ii)]

A PHA must identify the basic criteria the PHA will use for determining:

* * *

- (ii) A significant amendment or modification to its 5-Year Plan and Annual Plan.

A Significant Amendment or Modification to 5-Year and Annual Plan means a discretionary change in HACH's plans or policies that, other than the exception listed below:

- Fundamentally change the mission, objectives, or plans of the agency; and
- Require formal approval of the Board of Commissioners.

HUD and HACH consider the following to be a Significant Amendment or Modification to 5-Year and Annual Plan [Notice PIH 99-51]:

- Changes to rent or admissions policies, or organization of the waiting list

-
- Additions of non-emergency Capital Fund Program (CFP) work items (items not included in the current CFP Annual Statement or CFP Five-Year Action Plan) in excess of a \$25,000 threshold per project
 - Addition of new drug elimination activities not included in the current Public Housing Drug Elimination Program Plan (PHDEP), if any
 - Any change regarding demolition or disposition, designation, homeownership programs, or conversion activities, not including RAD conversion

Significant Amendment or Modification does not include HACH-adopted changes to HACH plans and policies:

- Resulting from funding constraints
- That reflect HUD or other federal agency mandates, regulations, or directives
- Changes to processes or procedures that remain compliant with HACH policy
- That are not specifically described by HACH's PHA 5-Year and Annual Plan, or required PHA Plan elements
- Made to implement its Rental Assistance Demonstration (RAD) program

As part of the Rental Assistance Demonstration (RAD), Significant Amendment or Modification does not include HACH adopted changes to HACH plans and policies to:

- Convert LIPH units to a Rental Assistance Demonstration (RAD) project using either Project Based Vouchers (PBVs) or Project Based Rental Assistance (PBRA)
- Alter the Capital Fund Program Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds
- Alter construction and rehabilitation plan for each approved RAD Conversion
- Alter financing structures for each approved RAD Conversion

[B.1\(c\) Submit PHA's Deconcentration Policy for Field Office Review](#)

For specific information concerning HACH's deconcentration policy, please refer to HACH's Housing Choice Voucher Administrative Plan (Admin Plan) and Low-Income Public Housing Admissions and Continued Occupancy Plan (ACOP). HACH's deconcentration policy has been integrated into those program's policies.

B.2 New Activities

B.2(b) Describe activities planned for the current Fiscal Year

HOPE VI or Choice Neighborhoods

No new activity planned.

Mixed Finance Modernization or Development

No new activity planned.

Demolition and/or Disposition [§ 903.7(h)]

A statement of any demolition and/or disposition –

- (1) Plan for Demolition/Disposition. With respect to public housing only, a description of any public housing development, or portion of a public housing development, 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 (42 U.S.C. 1437p), and the timetable for demolition and/or disposition...

One or more of properties or units may also be submitted for HUD's traditional Demo/Dispo program rather than through RAD, depending largely on the viability of the property or unit continuing as an LIPH or RAD unit. An approved disposition might allow the subject properties to be disposed at Fair Market Value (FMV) and allow for substantial rehabilitation utilizing various sources of funding, including private funding.

Designated Housing for Elderly and/or Disabled Families

HACH may undertake to have the following project designated as Housing for Elderly:

- Betty Knox Apartments, 141 Woodland Street
- Kent Apartments, 188 Sigourney Street
- Mary Mahoney Village, 73-81 Vine Street
- Smith Tower, 80 Charter Oak Avenue

Conversion of Public Housing to Tenant-Based Assistance [§ 903.7(j)]

A statement of the conversion of public housing to tenant-based assistance.

- (1) This statement describes:
 - (i) Any building or buildings that the PHA is required to convert to tenant-based assistance under section 33 of the 1937 Act (42 U.S.C. 1437z-5);
 - (ii) The status of any building or buildings that the PHA may be required to convert to tenant-based assistance under section 202 of the Fiscal Year 1996 HUD Appropriations Act (42 U.S.C. 14371 note); or
 - (iii) The PHA's plans to voluntarily convert under section 22 of the 1937 Act (42 U.S.C. 1437t).
- (2) The statement also must include an analysis of the developments or buildings required to be converted under section 33.
- (3) For both voluntary and required conversions, the statement must include the amount of assistance received commencing in Federal Fiscal Year 1999 to be used for rental assistance or other housing assistance in connection with such conversion.

-
- (4) The application and approval processes for required or voluntary conversions are separate approval processes. Approval of the PHA Plan does not constitute approval of these activities.
 - (5) The information required under this paragraph (j) of this section is applicable to public housing and only that tenant-based assistance which is to be included in the conversion plan.

No new activity planned.

Conversion of Public Housing to Project-Based Assistance under RAD

HUD strongly encourages PHAs contemplating demolition/disposition applications for their public housing units to consider HUD's Rental Assistance Demonstration (RAD) program. RAD offers various advantages to residents and PHAs such as resident protections, extensive waivers of statutes, and regulations to enable long-term preservation (e.g., ability to retain reserves at the project). HACH, therefore, is considering the disposition of select low-income public housing properties in its portfolio through RAD. The projects may also include substantial rehabilitation and new construction to preserve the properties' long-term viability as affordable or mixed-affordable housing.

HACH has entered its portfolio of LIPH housing into the RAD program. If selected, it may pursue the conversion of one or more developments.

Occupancy by Over-Income Families

HACH has not changed its plans concerning occupancy by over-income families in 2019.

Occupancy by Police Officers

HACH has not changed its plans concerning occupancy by police officers in 2019.

Non-Smoking Policies

HACH implemented the HUD-required no-smoking policy starting on January 1, 2018, with full enforcement on July 30, 2018. HACH does not permit smoking on any of its properties.

HACH has not changed its plans concerning its no-smoking policy for 2019.

Project-Based Vouchers

In FY 2017, HACH entered into a PBV contract for 16 units of new construction. In FY 2018, HACH expects to enter into a PBV contract for those units and may enter into an AHAP contract for up to 35 more units to continue its redevelopment of Bowles Park and to start the redevelopment of Westbrook Village.

HACH has no plans to offer more units in 2019 unless presented with an unplanned opportunity to deconcentrate poverty or modernize existing HACH inventory.

Units with Approved Vacancies for Modernization

No new activity planned. HACH will be continuing the substantial rehabilitation of vacant units as depicted in the 5-year plan.

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

No new activity planned.

B.3 Civil Rights Certification [§ 903.7(o)]

Certifications of Compliance with PHA Plans and Related Regulations (Standard, Troubled, HCV-Only, and High Performer PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 02/29/2016

PHA Certifications of Compliance with the PHA Plan and Related Regulations including Required Civil Rights Certifications

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year and/or Annual PHA Plan for the PHA fiscal year beginning 2019, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
14. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).


Housing Authority of the City of Hartford
PHA Name

CT003
PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2019

5-Year PHA Plan for Fiscal Years 20__ - 20__

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Authorized Official	Title
<i>Annette Sanderson</i>	<i>Executive Director</i>
Signature	Date
	<i>10/11/18</i>

B.4 Most Recent Fiscal Year Audit [§ 903.7(p)]

B.4(b) Describe the findings

This statement provides the results of the most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the 1937 Act (42 U.S.C. 1437c(h)).

Material Weakness in Internal Controls Repeated from year 2015 (See Prior Year Finding)

Condition: The Authority did not have adequate controls over the year-end financial reporting process to detect material misstatements. Numerous adjustments were needed during the audit process to properly reflect the financial data schedule in accordance with generally accepted accounting principles.

Criteria: In accordance with AU 265 Communicating Internal Control Related Matters, when a deficiency or a combination of deficiencies in internal control is identified, which indicates that there is a reasonable possibility that a material misstatement of the financial statements will not be presented or detected and corrected on a timely basis; a material weakness should be reported.

Cause: Due to the lack of permanent staffing, the Authority did not have the resources available for the complexity of the year-end close process in accordance with generally accepted accounting principles, which resulted in numerous audit adjustments. The HUD-required 60-day unaudited submission adds to the difficulty in reconciling and properly accounting for the Authority's activity, given the current staffing level, to provide financial information in a timely and accurate manner.

Effect: The unaudited data submitted to REAC required material audit adjustments and the overall timing of the audit was delayed considerably.

Auditor's Recommendations: Management should determine proper staffing needs given the size and complexity of the Authority, to ensure proper financial reporting in the financial data schedule in accordance with generally accepted accounting principles, which is due 60 days after year end. We further recommend that the Authority utilize a year-end checklist that would assist in the year-end close in a timely manner and prepare for an efficient audit in an organized method, whereby year-end binders are utilized for gathering the support of all material general ledger items.

B.5 Progress Report [§ 903.7(r)]

Describe PHA's progress in meeting its Mission and Goals described in PHA's 5-Year and Annual Plan

(1) For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan.

The following are HACH's Goals from its 5-Year Plan, and the activities HACH has taken in 2018 to move towards those goals:

HACH Goal: Provide an Improved Living Environment

- Beginning enforcement of its no-smoking policy as of 7/31/18
- Safety upgrades (fire-alarms) to elderly developments completed
- New trespass policy, procedures, and training to prevent undesirable individuals from visiting HACH properties

HACH Goal: Promote Self-Sufficiency

- Applying for Financial Self-Sufficiency program funding for HCV program

HACH Goal: Asset Development

- Deploying PBVs for new rental housing
- Improved procurement policy and procedures
- Improved Section 3 Plan and implementation

HACH Goal: Assist Each Community to Achieve High-Quality of Life Expectations through Low-Density and Modern Housing Quality Standards

- N/A

HACH Goal: Ensure the safety of all residents in the event of a catastrophic event

- Upgrades to elderly building fire alarms, with implementation completing the fourth quarter 2018
- Adding preference in 2019 in the Section 8 program to allow HACH to move tenants displaced by a catastrophic event to get vouchers rather than wait in a hotel for repairs or an available unit

Secondary HACH Goals: Explore a 501(c)(3) management company to focus on management services for HACH-held properties, including private developments

- HACH subsidiary Overlook Development Corporation, Inc., looked at opportunities in HACH's portfolio, including the conversion of entire portfolio to RAD

Secondary HACH Goals: Explore creating a private maintenance service to be resident run, managed, or controlled, to provide repairs, construction improvements, and ground services to HACH.

- No progress in 2018

Secondary HACH Goals: Explore the development of a wellness facility for families with children in need of supportive services

- No progress in 2018

Secondary HACH Goals: Explore development of after-school “homework club”

- No progress in 2018

Secondary HACH Goals: Explore all resources that will support, encourage, and strengthen HACH families, e.g., the healthy marriage program, parents in institutions, and older adults assuming care of grandchildren

- HACH’s tightening of policy governing the additions to household composition, in both the LIPH and HCV programs, has focused the understanding of family obligations and responsibilities, both among staff and residents
- HACH’s expansion of its elderly preference at AMP-6 developments was designed to permit grandparents to care for a grandchild in those developments

Such other information as HUD may request of PHA’s

(3) A PHA must include such other information as HUD may request of PHAs, either on an individual or across-the-board basis. HUD will advise the PHA or PHAs of this additional information through advance notice.

HUD did not request HACH provide any additional information through advanced notice.

B.6 Resident Advisory Board (RAB) Comments

B.6(c)(1) Attached RAB comments

HACH has two Resident Advisory Boards: one for the Low-Income Public Housing Program (LIPH) and one for the Housing Choice Voucher (HCV) Program. HACH takes this approach because HACH’s HCV program is not represented on the LIPH jurisdiction-wide tenant-organization (the RAB for the LIPH program).

HACH convened the LIPH RAB to discuss proposed HCV changes several times over a three-month period. A summary of the LIPH RAB’s recommendations, decisions, and comments are listed below. HACH has interwoven its response after each comment, in the manner of a Final Rule appearing in the Federal Register.

From the 6/28/18 meeting with the LIPH RAB, convened as the jurisdiction-wide resident council meeting, members commented verbally on policy:

- Several commenters wanted to know about the progress in implementing the elderly preference at Betty Knox Apartments and Kent Apartments, and if that preference could be extended to two additional properties: Mary Mahoney Village and Smith Tower.

-
- HACH Response: The elderly preference has been implemented and is being used for all new offers at Betty Knox and Kent. HACH will be extending that preference to Mary Mahoney and Smith Tower in 2019.
 - Commenter wanted to know the Authority's policy concerning refreshing his unit, e.g. a coat of paint.
 - HACH Response: HACH recognizes the need to refresh units but has dedicated its funding to keeping the buildings operational. HACH will develop a strategy for painting units, if funds become available.

From the 7/24/18 meeting with the LIPH RAB, members commented verbally on HACH's proposed changes to policy (provided in a hand-out):

- Commenter wanted to know if children would be allowed in developments with the proposed 55+ local admissions preference that is being extended to Mary Mahoney and Smith Tower.
 - HACH Response: HACH does not limit the family composition of applicants to those developments. If a grandparent includes a grandchild in the family, both can live in any development and the presence of a child in the family does not limit the family from receiving the local preference. That is, the preference does not consider familial status.

That said, the units at the developments covered by the preference (Betty, Kent, Mahoney, and Smith) are mostly zero and 1-bedroom units, which would limit the size of a family living at one of these developments.
- Commenter wanted to know if there would be a grace period for repayment agreement payments.
 - HACH Response: Yes, the grace period for repayment agreement payments is the same as the grace period for rent payments. HACH's goal was to align the two payments, as well as their grace periods.
- Commenters wanted to know if the reduced notice period for rent increases would be changing for all certifications.
 - HACH Response: No, HACH proposes that the reduced notice period for change of rent would only apply to interim certifications. The notice period for annual certifications would remain unchanged.

At the 8/22/18 meeting with the LIPH RAB, HACH summarized the prior RAB findings and reported to the RAB comments from tenants received by HACH during its visit to each development. The RAB members provided no further comments.

In a letter from the LIPH RAB, dated October 10, 2018, to Executive Director Annette Sanderson, the RAB summarized its concerns with the proposed ACOP changes with three points:

- The proposed 15-day notice for rent increase is too short
 - HACH Response: First, this change only applies to rent increases resulting from an interim examination of a family's income. For an annual examination of income, tenants that provide HACH with income documents in a timely manner will generally get forty-five to seventy-five days advanced notice of a rent increase. Second, though the proposed rent-increase notice period seems short, it is only a single step in the rent-increase process that HACH has shortened. The policy that rent increases do not come

into effect until the first day of the month following HACH's rent increase notice to a tenant is not changing. That makes the 15-day rent notice period unlikely. The only time a tenant would get only 15 days between an increase of income and a rent increase would be if the tenant reported the income change immediately on the 14th of the month and HACH processed it and wrote the income change notice that same day. In the same scenario, if the tenant reports the income on the 16th of the month, the new rent wouldn't come into effect for forty-four days. If we consider the 10 business days in which the tenant must report a change in income and the time that HACH will take to process the request, it is more likely that a tenant will get, on average, forty-five days between an increase in income and a rent increase with this policy change versus sixty days average with the exist policy. HACH does not believe the burden of having rent adjust within one and one-half months of an income change rather than two months as substantial.

- Too many young people at elderly properties
 - HACH Response: The LIPH RAB expressed this sentiment in 2017 and adjustments were made to the ACOP's preferences for 2018, which are now in effect. Further preference changes are being made in this plan for two additional developments to address this concern.
- Security issues need to be addressed
 - HACH Response: HACH is sensitive to safety and security concerns. HACH has been vigorously fighting lease violations by tenants that compromise safety when it has the evidence to do so. HACH will continue to investigate solutions to improve security.

The Authority convened a second RAB composed of HCV participants invited to discuss proposed HCV changes. The Authority invited over 30 active HCV participants (as determined by caseworkers) to participate in HACH HCV RAB.

From the 8/29/18 meeting with the HCV RAB, members commented verbally on HACH's proposed changes to policy (provided in a hand-out):

- Commenter appreciated HACH's expansion of the voucher term from 90 to 120 days. Commenter was concerned that HACH is removing some of its oversight of the process of locating a rental unit by not requiring check-in, as was done under the previous policy. Commenter suggested that the term expand to 120 by offering a second automatic extension.
 - HACH Response: HACH thinks this suggestion is sound and will implement the expansion of the voucher term from 90 to 120 days by offering a second automatic extension after the applicant/tenant checks in with his or her caseworker.

B.6(c)(2) Narrative describing PHA's analysis of the RAB recommendations and the decisions made on these recommendations

HACH's analysis of the RAB's recommendations and comments is interwoven into the text above.

B.6 (related) Public Comments/Challenged Elements

Public comments & narrative describing PHA's analysis of the public's recommendations and the decisions made on these recommendations

HACH held a public meeting to discuss its Annual PHA Plan on September 17, 2018, at 5:30 p.m. at the HACH's main office. HACH advertised the meeting in the Hartford Courant on July 25, 2018 (56 days before the meeting) and on HACH's website on July 23, 2018 (57 days before the meeting and remaining for the duration of the notice period). The public meeting was also announced to all tenant organization leaders and the Resident Advisory Board.

Attendance at the public hearing was light, with the primary interest being that of the HCV waiting list.

From the 9/17/18 public hearing, the public commented verbally on HACH's proposed changes to policy (provided in a hand-out):

- Commenter wanted to know why it was so difficult to get a Section 8 voucher and wanted to know how to learn of wait-list openings.
 - HACH Response: HACH is sympathetic with Commenters concerns. HACH's funding limits the number of vouchers that it can issue. HACH notes that it is applying for specialty vouchers when they become available through a NOFA. HACH also explained to the Commenter how the 211-system and cthcvp.org website work.

HACH also presented its proposed ACOP changes to the current tenants of each development in open meetings announced through tenant councils and local publication. Open meetings were held at:

- Smith Tower, August 21st, 10:00 a.m.
- Betty Knox Apartments, August 21st, 11:30 a.m.
- Kent Apartments, August 21st, 1:30 p.m.
- Mary Mahoney Village, August 21st, 3:30 p.m.
- Mary Shepard Place, Stowe Village, Charter Oak Terrace, Nelton Court & Scatter Sites, August 30th, 5:00 p.m.

From HACH's presentation of the ACOP changes, tenants commented verbally on policy:

- Commenter requested that HACH provide a list of all documents required by policy for an annual reexamination of income and household so that they can be collected before the meeting.
 - HACH Response: This suggestion has been forwarded to HACH's Occupancy Department.
- Commenter asked why HACH has expanded its document request to include IRS forms even for individuals on SSI and SSD (fixed income).
 - HACH Response: The Occupancy Department changed its annual reexamination documentation list uniformly, for all residents, as part of a fraud detection initiative. The result has been positive. The Occupancy Department will revisit breadth of the IRS document request in the future.

-
- Commenter was concerned about the three-strike rule related to repayment agreements. Commenter thought that in unusual circumstances outside of the family's control, that a family might be terminated unfairly.
 - HACH Response: HACH recognizes that unusual circumstance outside of the family's control may precipitate events that cause the need for a repayment agreement. HACH will modify the proposed three-strike language to ignore repayment agreements related to those circumstances.

Challenged Elements [Notice PIH-2015-18]

If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response. HUD will consider incorporating this element into future versions of the PHA Plan templates.

No elements of HACH's Annual PHA Plan or 5-Year PHA Plan have been challenged.

Narrative describing PHA's analysis of challenged elements

Not applicable – see above.

B.7 Certification by State or Local Official

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan

**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 2/29/2016

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

I, Luke Bronin, the Mayor, City of Hartford
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

Housing Authority of the City of Hartford
PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of

Impediments (AI) to Fair Housing Choice of the

City of Hartford
Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State Consolidated Plan and the AI.

The Hartford Housing Authority's 2019 Annual Plan is consistent with and aligned to the housing and community needs noted in the City of Hartford's Five Year FY 2015-19 Consolidated Plan; And will focus on addressing the housing needs of low and middle income individuals.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	Title
<u>Luke Bronin</u> 	<u>Mayor, City of Hartford</u>
Signature	Date
	<u>8/28/18</u>

B.8 Troubled PHA

HACH does not have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place.

C. Statement of Capital Improvements

[24 CFR § 903.7(g)] With respect to public housing only, this statement describes the capital improvements necessary to ensure long-term physical and social viability of the PHA's public housing developments, including the capital improvements to be undertaken in the year in question and their estimated costs, and any other information required for participation in the Capital Fund. PHAs also are required to include 5-Year Plans covering large capital items.

[Notice PIH-2015-18] In order to comply with the requirements of 24 CFR §903.7(g), PHAs are required to include a statement of capital improvements needed in the Annual PHA Plan. In the past, a PHA satisfied this requirement by including copies of its Capital Fund Annual Statement or Performance and Evaluation Report (HUD 50075.1) and the Capital Fund Program 5 Year-Action Plan (HUD 50075.2) forms with the Annual PHA Plan. In 2013, HUD published the Capital Fund Final Rule which decoupled the Capital Fund submission from the Annual PHA Plan and 5-Year PHA Plan.

However, PHAs are still required to incorporate some information on the capital improvement needs in the Annual PHA Plan.

In order to comply with this requirement, the PHA must reference in its Annual PHA Plan the most recent HUD approved Capital Fund 5-Year Action Plan (HUD 50075.2). PHAs can reference the form by including the following language in the Capital Improvements section of the appropriate Annual or Streamlined PHA Plan Template: "See HUD Form 50075.2 approved by HUD on XX/XX/XXXX." This reference statement is intended to mean that the 50075.2 describes the capital improvements necessary to ensure long-term physical and social viability of the projects." It is anticipated that the local Field Office will have a copy of the most recent HUD approved Capital Fund 5 Year Action Plan (50075.2) on file.

Most recent HUD-approved 5-Year Action Plan

See HUD form 50075.2 approved by HUD on April 13, 2015.

D. Other Certification Requirements

D.1 Board of Commissioners Resolution

**HOUSING AUTHORITY OF THE CITY OF HARTFORD
RESOLUTION NO. 2018-33**

Regarding the Annual PHA Plan for 2019

WHEREAS, The United States Congress Quality Housing and Work Responsibility Act of 1998 (QHWRA) requires the submission of an Annual PHA Plan for each Public Housing Authority under the jurisdiction of the U. S. Department of Housing and Urban Development (HUD), each year; and

WHEREAS, The Housing Authority of the City of Hartford (HACH) has developed an Annual PHA Plan in accordance with QHWRA and the applicable Public and Indian Housing Notices, which includes changes to the Low-Income Public Housing *Admissions and Continued Occupancy Policy* (ACOP) and its associated Lease and Property Rules, and the Housing Choice Voucher (Section 8) *Administrative Plan*; and

WHEREAS, the Annual PHA Plan was made available for public review and comment for 45 days as of July 25, 2018, and presented and discussed:


- by members of HACH's Resident Advisory Boards,
- at other meetings arranged at the convenience of LIPH residents, and
- at a Public Hearing held on Monday, September 17, 2018.

NOW, THEREFORE, BE IT RESOLVED that the Board of Commissioners of the Housing Authority of the City of Hartford, at a special meeting held on Wednesday, October 3, 2018, at the offices of the Housing Authority of the City of Hartford, 180 John D. Wardlaw Way, Hartford, Connecticut, does hereby authorize and direct:

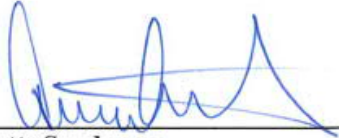
- The Chairperson of the Board of Commissioners or the Executive Director to sign the PHA Certification of Compliance with the Annual Plan and Related Regulations;
- The Executive Director to add to the Annual Plan the Resident Advisory Board's (RAB's) final written comments, when and if received before October 12, 2018, and the HACH's response to that letter; and
- The Executive Director to sign any and all ancillary certifications, disclosures, and any other related documents that are required in the submission of the Annual PHA Plan for 2019, in order to effect the proper submission.

PASSED, ADOPTED, AND APPROVED this 3rd day of October 2018.

ATTEST:




Marilyn E. Rossetti
Chairperson



Annette Sanderson
Executive Director

Reviewed and Approved as to Legal Sufficiency:



Ben Bare
General Counsel

D.2 Certification of Payments to Influence Federal Transaction – HUD-50071

Notice PIH 2017-04

If a PHA has received over \$100,000 in federally appropriated funds, in any PHA fiscal year, the PHA must submit Form HUD-50071 Certification of Payments to Influence Federal Transactions (Form HUD-50071), certifying that the PHA has not and will not make any prohibited payments from federal appropriated funds. Additionally, HUD requires these PHAs to submit Standard Form-LLL Disclosure of Lobbying Activities (SF-LLL), only if they have used non-federally appropriated funds for influencing or attempting to influence executive or legislative branch personnel in connection with new or renewal funding or regarding the formulation, modification, or adoption of policy or legislation.

The certification and disclosure requirements apply to all PHAs (including MTW PHAs) established under State law receiving federal appropriations, if the amount of federally appropriated funds exceed \$100,000, in any PHA fiscal year. In the event a PHA's grant amounts are not large enough (i.e., \$100,000 or less) to trigger the certification and disclosure requirements, the prohibition against the use of federally appropriated funds for lobbying activities still applies.

In accordance with the Lobbying Disclosure Act of 1995 (the Act), lobbying activities are defined as: lobbying contacts and efforts in support of such contacts, including preparation and planning activities; research and other background work that was intended, at the time it was performed, for use in contacts; and coordination with the lobbying activities of others. Under the Act, any oral, written, or electronic communication with covered officials regarding new or renewal funding or the formulation, modification, or adoption of policy or legislation constitutes a lobbying contact. Communications with covered officials relating to the administration or execution of a Federal program or policy are also included. Covered officials include, among others, members of Congress and executive officials, such as agency heads and deputies and assistant and deputy assistant secretaries.

PHAs are not prohibited from engaging in lobbying activities if the activities are funded with non-federally appropriated funds. However, disclosure requirements still apply.

PHAs' contributions to trade associations do not constitute lobbying activities under this Notice. Any lobbying activities conducted by a trade association shall be registered by that trade association's lobbyist. The certification and disclosure requirements in this Notice do not apply to PHA contributions to trade associations.

HACH will receive over \$100,000 in federally appropriated funds in 2019, and so submits the Form HUD-50071 with this Annual PHA Plan.

HACH has not used non-federally appropriated funds for influencing or attempting to influence executive or legislative branch personnel in connection with new or renewal funding or regarding the formulation, modification, or adoption of policy or legislation, and so it therefore is not obligated to submit Standard Form-LLL, Disclosure of Lobbying Activities (SF-LLL).

Certification of Payments to Influence Federal Transactions

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

Applicant Name

Housing Authority of the City of Hartford

Program/Activity Receiving Federal Grant Funding

Low-income Public Housing, Capital Funds, Operating Funds

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Annette Sanderson

Title

Executive Director

Signature

Date (mm/dd/yyyy)

10/11/18

Previous edition is obsolete

form HUD 50071 (01/14)
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3