



Housing Authority of the City of Hartford

ANNUAL PHA PLAN for the FISCAL YEAR 2021 STANDARD PHA PLAN [CT003]

180 John D. Wardlaw Way
Hartford, Connecticut 06106
(860) 723-8410

Table of Contents

Executive Summary	1
How to Read this Plan	1
Form HUD-50075-ST	3
A. PHA Information	6
Mission Statement	6
A.1 Availability of Information	6
B. Annual Plan Elements	7
B.1 Revision of PHA Plan Element	7
<i>B.1(b) Describe revisions for each revised element</i>	<i>7</i>
Statement of Housing Needs and Strategy for Addressing Housing Needs [§ 903.7(a)].....	7
Deconcentration and Policies that Govern Eligibility, Selection, and Admissions [§ 903.7(b)].....	10
Financial Resources [§ 903.7(c)]	11
Rent Determination [§ 903.7(d)]	12
Operations and Management [§ 903.7(e)]	12
Grievance Procedures [§ 903.7(f)]	14
Homeownership Programs [§ 903.7(k)].....	15
Community Service and Self-Sufficiency Programs [§ 903.7(l)].....	15
Safety and Crime Prevention [§ 903.7(m)]	16
Pet Policy [§ 903.7(n)]	17
Asset Management [§ 903.7(q)]	17
Substantial Deviation [§ 903.7(r)(2)(i)]	17
Significant Amendment or Modification [§ 903.7(r)(2)(ii)]	18
<i>B.1(c) Submit PHA’s Deconcentration Policy for Field Office Review</i>	<i>19</i>
B.2 New Activities	20
<i>B.2(b) Describe activities planned for the current Fiscal Year</i>	<i>20</i>
HOPE VI or Choice Neighborhoods	20
Mixed Finance Modernization or Development.....	20
Demolition and/or Disposition [§ 903.7(h)].....	20
Designated Housing for Elderly and/or Disabled Families.....	20
Conversion of Public Housing to Tenant-Based Assistance [§ 903.7(j)]	20
Conversion of Public Housing to Project-Based Assistance under RAD.....	21
Conversion of Public Housing to Project-Based Assistance under RAD.....	22

Occupancy by Over-Income Families	22
Occupancy by Police Officers	23
Non-Smoking Policies.....	23
Project-Based Vouchers	23
Units with Approved Vacancies for Modernization	23
Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).....	23
B.3 Civil Rights Certification [§ 903.7(o)]	24
B.4 Most Recent Fiscal Year Audit [§ 903.7(p)]	26
<i>B.4(b) Describe the findings</i>	<i>26</i>
B.5 Progress Report [§ 903.7(r)]	27
<i>Describe PHA’s progress in meeting its Mission and Goals described in PHA’s 5-Year and Annual Plan</i>	<i>27</i>
Progress in Meeting HACH’s Mission Described in the 5-Year Plan	28
Progress in Meeting HACH’s Goals Described in the 5-Year Plan: PHAS Score	29
Progress in Meeting HACH’s Goals Described in the 5-Year Plan: SEMAP Score	32
<i>Such other information as HUD may request of PHA’s.....</i>	<i>33</i>
B.6 Resident Advisory Board (RAB) Comments	33
<i>B.6(c)(1) Attached RAB comments</i>	<i>33</i>
<i>B.6(c)(2) Narrative describing PHA’s analysis of the RAB recommendations and the decisions made on these recommendations.....</i>	<i>35</i>
B.6 (related) Public Comments/Challenged Elements	35
<i>Public comments & narrative describing PHA’s analysis of the public’s recommendations and the decisions made on these recommendations</i>	<i>35</i>
<i>Challenged Elements [Notice PIH-2015-18]</i>	<i>35</i>
<i>Narrative describing PHA’s analysis of challenged elements</i>	<i>35</i>
B.7 Certification by State or Local Official.....	36
<i>Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan</i>	<i>36</i>
B.8 Troubled PHA	37
C. Statement of Capital Improvements	38
Most recent HUD-approved 5-Year Action Plan	38
D. Other Certification Requirements.....	39
D.1 Board of Commissioners Resolution.....	39
D.2 Certification of Payments to Influence Federal Transaction [HUD-50071].....	40

<i>Notice PIH 2017-04</i>	40
HUD Approval	42

Executive Summary

The public housing agency (PHA) plan is a comprehensive guide to agency policies, programs, operations, and strategies for meeting local housing needs and goals.

The purpose of the Housing Authority of the City of Hartford's (HACH) *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's three primary interests over the next five years, set forth in the *5-Year PHA Plan*, are:

- to expand its successful Housing Choice Voucher (HCV or Section 8) program,
- to continue to advance its low-income housing portfolio into a more sustainable model, and
- to continue to improve the efficiency and efficacy of its internal operations.

HACH runs a high performing HCV program. HACH's focus for the HCV program is to continue to make more, higher-quality opportunities available to Hartford's housing-impaired families. This will include HACH's continued use of Project-Based Housing Choice Vouchers (PBVs) to encourage affordable housing development. HACH will also continue to grow its HCV program. Over the recent years, HACH has added Family Unification Program (FUP) vouchers and Mainstream Vouchers (targeting to young disabled individuals) to its current mix of Veterans Affairs Supportive Housing (VASH) vouchers, Tenant Protection Vouchers (TPV), and tenant-based vouchers. Over the next year, HACH will continue to explore and seek grants for other voucher opportunities. Capping this off, HACH will continue to improve the efficiency of its administration of its voucher program.

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 has begun to make changes so that the program or its progeny can offer improved housing, more efficiently. In 2019, HACH completed its second conversion of LIPH to RAD, with the conversion of it Nelton Court and Nelson St. developments, and the development, now run by a HACH instrumentality, is running smoothly. With that success, HACH has queued up other LIPH developments to convert to RAD and is continuing to dispose of unsustainable housing stock. HACH's repositioning of its LIPH housing stock and seizing better opportunities for sustainable subsidized housing fits HACH's mission.

How to Read this Plan

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

The sections in this plan are numbered to correspond with the HUD-50075-ST. 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: 07/16/2019
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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>1/2021</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>988</u></p> <p style="padding-left: 20px;">Number of Housing Choice Vouchers (HCVs): <u>2,072</u></p> <p style="padding-left: 40px;">Total Combined Units/Vouchers: <u>3,050</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;"><i>See Section A.1 below.</i></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: 15%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 15%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 30%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 30%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 15%;">PH</th> <th style="width: 15%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></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 checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs <input type="checkbox"/> <input checked="" type="checkbox"/> De-concentration and Other Policies that Govern Eligibility, Selection, and Admissions. <input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources. <input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination. <input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management. <input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures. <input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs. <input type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs. <input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention. <input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy. <input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management. <input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation. <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 De-concentration 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. <input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development. <input type="checkbox"/> <input checked="" type="checkbox"/> Demolition and/or Disposition. <input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families. <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance. <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD. <input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families. <input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers. <input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies. <input type="checkbox"/> <input checked="" type="checkbox"/> Project-Based Vouchers. <input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization. <input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</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. See Section B.2 below.</p>
B.3	<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. See Section B.3 below.</p>

<p>B.4</p>	<p>Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y N <input checked="" type="checkbox"/> <input type="checkbox"/> (b) If yes, please describe: <i>See Section B.4 below.</i></p>
<p>B.5</p>	<p>Progress Report. Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. <i>See Section B.5 below.</i></p>
<p>B.6</p>	<p>Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) provide comments to the PHA Plan? Y N <input checked="" type="checkbox"/> <input type="checkbox"/> (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. <i>See Section B.6 below.</i></p>
<p>B.7</p>	<p>Certification by State or Local Officials. 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. <i>See Section B.7 below.</i></p>
<p>B.8</p>	<p>Troubled PHA. (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"/> (b) If yes, please describe:</p>
<p>C. 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. <i>See Section C.1 below.</i></p>

A. PHA Information

Mission Statement

It is the mission of the Housing Authority of the City of Hartford (HACH):

- to be a fiscally sound agency
- that provides safe, decent and affordable high-quality housing and homeownership choices.

HACH strives to:

- become closer to our resident and community partners,
- while being a positive catalyst for the creation of economic opportunities and independence in diverse communities.

HACH will provide:

- a positive work environment for our employees; and
- value-added supportive services to our residents.

A.1 Availability of Information

HACH's FY 2021 *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)

Betty Knox Apartments
141 Woodland Street
Hartford, CT 06105

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

Kent Apartments
188 Sigourney Street
Hartford, CT 06105

Mary Shepard Place
15 Pavilion St.
Hartford, CT 06120

Mary Mahoney Village
73-81 Vine Street
Hartford, CT 06112

In addition, this FY 2021 *Annual PHA Plan* is available on HACH's website: www.hartfordhousing.org.

HACH provides a copy of the FY 2021 *Annual PHA Plan* to each resident council, after Board approval.

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))

HACH coordinates its statement of housing needs and strategy for addressing housing needs with the City of Hartford publication of its *Consolidated Plan*. In its 2020 *Consolidated Plan*, the City of Hartford notes that:

The largest housing problem in the City of Hartford is housing affordability. According to the 2012-2016 ACS data, 58.1% of all renter households are cost overburdened by 30% or more, and 33.5% of all owner households are cost overburdened by 30% or more.

In consultations, interviews, and surveys, the most frequently cited housing issue is the poor condition of rental housing. Though there is rental housing that is technically affordable, it is not decent, safe, and sound rental housing. There is a need to provide higher quality rental housing to the residents of the City of Hartford.

Housing for the disabled is another unmet housing need and problem. The City's housing stock is older. The housing stock is historic and difficult and expensive to rehabilitate. Much of the housing is multi-story and multi-family housing, creates more barriers for disabled individuals and families.

It continues:

[T]he elderly and disabled populations are the most affected by the high cost of housing in the City of Hartford. The elderly and disabled are on fixed or limited incomes. The lack of affordable housing that is decent, safe, and sound, forces them into housing that does not meet code standards.

Other populations disproportionately affected by housing problems are minority populations, specifically residents who are Black/African American and Hispanic or Latino. The majority of

households in the City are renter-occupied households, and low-income, minority renters are the most affected by housing problems.

The other large group affected by the lack of affordable housing is the homeless and persons at-risk of becoming homeless, including persons who are victims of domestic violence.

HUD data¹ for Hartford show that Hartford lags far behind the state and the nation in jobs and housing affordability:

	Hartford	State	National
Total Population:	124,795	3,593,222	316,515,021
Median Family Income:	\$ 34,628	\$ 89,031	\$ 66,011
Unemployment Rate:	19%	9%	8%
Living below poverty level:	34%	10%	15%
Home Ownership:	24%	67%	64%
Median Housing Price:	\$161,400	\$270,500	\$178,600
Vacant Housing:	15%	9%	12%
Renters:	76%	33%	36%
Median Rent:	\$743	\$895	\$776
Families Spending Over 30% On Housing:	51%	36%	32%
Families Spending Over 50% On Housing:	29%	17%	15%
Families Spending Over 30% On Housing that are low-income:	75%	77%	72%

HACH’s mission is to provide safe, decent, and affordable, high-quality housing and homeownership choices. There is an obvious and pressing need for housing in Hartford. To that end, HACH is expanding its executive goals in 2021 to include the following:

Need 1: Shortage of Affordable Housing for All Eligible Populations

Strategy 1: Maximize number of affordable units available to HACH within its current resources:

- Continue the conversion of its public housing portfolio to Rental Assistance Demonstration (RAD) units to preserve existing affordable housing units
- Review demolition or disposition options to permit the development of other future housing developments
- Continue to improve maintenance and management policies to minimize the number of vacant public housing units
- Continue to reduce turnover-time for vacated public housing units

¹ Everything not cited to another source is from: HUD EGIS Data for Hartford, Demographics, Source: Census ACS 5-Year Data, Update Frequency: Annual; URL: <https://egis.hud.gov/cart/#;demographics>; retrieved 7/16/2020

- With Small-Area Fair Market rents as its standard, HACH will continue to encourage HACH HCV families to live in the higher-opportunity areas of the city
- Step up enforcement of lease provisions to quell rent nonpayment losses
- Continue efforts to identify and locate partners, non-profit or for-profit, locally, or nationally based, to work with HACH on acquiring and developing vacant properties (180 John D. Wardlaw Way, the Market Place, etc.), as well as improving and developing additional housing opportunities for income-eligible public housing families.

Strategy 2: Increase the number of affordable housing units:

- Continue the process of converting derelict and degraded state public housing stock into new units
- Leverage affordable housing resources in the community so they may create of mixed-finance housing, for example, with PBVs

Need 2: Extremely low-income families (at or below 30% AMI)

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

- Exceed HUD federal HCV targeting requirements for families at or below 30% of AMI and use specialized vouchers to target at-risk communities, including tenant-protection vouchers (TPV), family unification vouchers (FUP), mainstream vouchers (MVS), and veterans’ affairs supportive housing vouchers (VASH).
- Enforce rent policies, i.e., Earned-Income-Disregard (EID), to support and encourage work

Need 3: Elderly Families and Families with a Disabled Member

Strategy: Target available assistance to the elderly and disabled

- Offer a preference in buildings suited to elderly living (e.g., efficiency and 1-bedroom units)
- Continue to work to expand the number of UFAS (ADA-style) units in HACH’s inventory, typically through redevelopment of existing units into the RAD program
- Expand notification to applicants and residents, advising families of their right to request reasonable accommodations to meet their specific needs

Need 4: Specific Family Type: Races/Ethnicities with Disproportionate Housing Needs

Strategy 1: Increase awareness of HACH resources among families of races and ethnicities with disproportionate needs

- Affirmatively market to races/ethnicities shown to have disproportionate housing needs

Strategy 2: Conduct activities to affirmatively further fair housing

- Counsel HCV clients as to location of units outside areas of poverty or minority concentration and assist them to locate those units
- Market the Section HCV to owners outside areas of poverty/minority concentration

Need 5: Clean, Safe Housing

Strategy 1: Lease enforcement

- Step up lease enforcement against violent and disruptive tenants, tenants using or dealing drugs, and others who violate their lease agreement.

Need 6: Size of units

Strategy 1: Right-sizing families against inventory

- Continue to move tenants to correctly sized units, minimizing the number of over-housed and under-housed families

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, 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

A covered development is any development of more than 100 public housing units that is not operated by the PHA as a development for elderly, disabled, or both.

HACH does not have any covered developments subject to HUD deconcentration requirements.

Waiting List Procedures

HACH's waiting list procedures for its LIPH program and HCV program can be found in its Admissions and Continued Occupancy Plan (ACOP) and Administrative Plan (Admin Plan), respectively.

No substantial modifications are planned for 2021, though HACH will continue improve the procedural efficiency and accessibility of its programs, particularly of its wait lists.

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 2021.

Financial Resources: Planned Sources

Sources	Planned Uses
1. Federal Grants (FY 2021 grants)	
Public Housing Operating Funds	PHA Operations
Public Housing Capital Fund	LIPH Capital Improvements
Public Housing Replacement Housing Factor (1 st and 2 nd Increments)	LIPH Replacement Housing
Annual Contributions: HCV	Housing Assistance Payments and Administrative Fees
Veteran Affairs Supportive Housing Program (VASH)	Housing Assistance Payments and Administrative Fees (included in HCV grant)

Resident Opportunity and Self-Sufficiency Grants (ROSS)	LIPH Service Coordinators
2. Prior Year Federal Grants (unobligated funds only)	
FY 2020 Public Housing Capital Fund	LIPH Capital Improvements
3. Public Housing Dwelling Rental Income	
Rent	PHA Operations
4. Other Income	
Interest on Investments (LIPH)	PHA Operations
Interest on Investments (HCV)	HCV Assistance
Dividends/Insurance Proceeds	PHA Operations
5. Non-federal Sources	
Other (Space Rentals)	PHA Operations

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.

No substantial modifications to HACH's rent determination policies 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 HACH's 2021 planned modifications to HACH's Housing Choice Voucher (HCV or Section 8) program and Low-Income Public Housing (LIPH) program.

Changes to Housing Choice Voucher Administrative Plan

HACH administers its HCV program with the policies and procedures found in its *Administrative Plan* (Admin Plan). HACH is not proposing any significant modifications to the Admin Plan policy's discretionary content, only non-material modification, technical corrections, and clarifications. Some of the general classes of changes are:

- Insignificant Modifications to Policy
 - *Changes to Admin Plan to improve clarity and comprehension*

There are many sections of the Admin Plan that cause confusion when a caseworker attempts to enforce the policy or follow a procedure. Many changes have been made to this Admin Plan to improve the clarity of the language and to provide an explication of commonly misunderstood policy and procedures.
- Procedural Modifications
 - *Additions to Admin Plan procedures*

To improve its performance capacity and efficiency, HACH has expanded the procedures documented in its Admin Plan.

Changes to the LIPH Admissions and Continued Occupancy Policy

HACH's LIPH program is administered with the policies and procedures found in its *Admissions and Continued Occupancy Plan* (ACOP). HACH is not proposing any significant modifications to the ACOP's discretionary content, only non-material, technical corrections, and clarifications. Some of the general classes of changes are:

- Insignificant Modifications to Policy
 - *Changes to ACOP to improve clarity and comprehension*

There are many sections of the ACOP that cause confusion when a caseworker attempts to enforce the policy or follow the procedure. Many changes have been made to this ACOP to improve the clarity of the language and to provide an explication of commonly misunderstood policy and procedures.
- Procedural Modifications
 - *Additions to ACOP procedures*

To improve its performance capacity and efficiency, HACH has expanded the procedures documented in its ACOP.

Changes to the LIPH Tenant Rental Agreement (Lease)

No changes anticipated.

HACH may modify its rental agreement from time to time during the year and will notify tenants of those changes as required by state law, HUD regulations, and HACH policy.

Changes to LIPH Property Rules and a Resident Services Fee Schedule

The following is a summary of the LIPH Property Rule changes for 2021:

- No changes anticipated for 2021.

The following is a summary of the LIPH Resident Services Fee Schedule changes for 2021:

- Several fees are increasing in price due to the increased cost of the item to HACH.

HACH may modify its *Property Rules* and *Resident Services Fee Schedule* from time to time during the year and will notify tenants of those changes as required by state law, HUD regulations, and HACH policy.

Prevention or Eradication of Pest Infestation

HACH's pest management services have been very successful. HACH will continue its extermination procedures into 2021.

Description of HACH's Management Organization

A board of five Commissioners governs HACH, all appointed by the Mayor of the City of Hartford, one of which must be a HACH tenant. An Executive Director, appointed by and reporting to the Board of Commissioners, provides day-to-day oversight. The following positions report to the Executive Director:

- Chief Financial Officer
- Housing Choice Voucher (HCV) Program Coordinator
- Chief Operating Officer
- Development Director
- General Counsel

HACH continually strengthens its operating policies, processes, procedures, and training. In 2021, HACH plans to continue to:

- Update its policies with acquired experience and best practices
- Create and update more procedures
- Create and expand 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)
- Housing Choice Voucher (RAD 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 substantial changes to its grievance policy and procedures other than non-material technical corrections and clarifications.

HCV

HACH's HCV informal hearing policy is found in HACH's Admin Plan. HACH is not proposing any substantial changes to the HCV Informal Hearing policy and procedures 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 encourages the construction of affordable home-ownership units as part of its redevelopment partnerships at Willow Creek (formerly Chester B. Bowles Park) and The Village at Park River (formerly Westbrook Village).

Otherwise, HACH does not have any plans for homeownership in 2021.

HCV

HACH has determined that it does not have the capacity to administrate an HCV homeownership program. This program will not be supported until HACH creates that capacity, as determined by the Executive Director.

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 (1) 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 is not proposing any substantial changes to its Community Service and Self-Sufficiency Programs. 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 offer 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 updated its safety and crime prevention statement in its 2018 *Annual PHA Plan*. No further revisions are included in this plan.

Domestic Violence, 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 one of HACH's programs. HACH updates its domestic violence, dating violence, sexual assault, and stalking prevention statement in its 2018 *Annual PHA Plan*. This plan includes no further revisions.

[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 Chapter 10 of the ACOP. HACH summarized its pet policy statement in its 2018 *Annual PHA Plan*. This plan includes no further revisions.

[Asset Management \[§ 903.7\(g\)\]](#)

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*

HACH's definition of a substantial deviation from its 5-Year Plan has not changed for 2021. It is repeated below.

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

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

- Outside the mission, agency goals and objectives, and VAWA goals that require formal approval by the Board of Commissioners

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

-
- That modify or alter 5-year executive goals or objectives, if the alteration still meets HACH’s mission, and agency goals and objectives
 - Resulting from funding constraints
 - Taken to reflect HUD or other federal agency mandates, regulations, or directives
 - That are not governed by HACH’s *PHA 5-Year Plan* or required 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.

HACH’s definition of a significant amendment or modification to its 5-Year Plan has not changed for 2021. It is repeated below.

A Significant Amendment or Modification to the Annual Plan means a discretionary change in HACH’s plans or policies, other than the exceptions listed below, that:

- Fundamentally alters the mission, purposes, or plans of the agency; and
- Requires formal approval of the Board of Commissioners.

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

- Changes to rent policies, 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
- Additions of new drug elimination activities not included in the current Public Housing Drug Elimination Program Plan (PHDEP), if any
- Any changes regarding demolition, disposition, designation, homeownership programs, or conversion activities, not including RAD conversion

Significant Amendments or Modifications *do not include* HACH-adopted changes to HACH plans and policies that:

- Result from funding constraints
- Reflect HUD or other federal agency mandates, regulations, or directives
- Alter processes or procedures that remain compliant with HACH policy
- Are not specifically described by HACH’s Annual Plan, or required PHA Plan elements
- 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 that:

- Convert LIPH units to Rental Assistance Demonstration (RAD) projects 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 plans for an approved RAD Conversion
- Alter financing structures for an 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 Low-Income Public Housing *Admissions and Continued Occupancy Plan (ACOP)*. HACH's integrated its deconcentration policy 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...*

HACH has not changed it previously stated plans for the demolish or dispose of LIPH units.

Designated Housing for Elderly and/or Disabled Families

HACH is not proposing to designate any of its developments as housing for elderly and/or disabled families.

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

PIH Notice 2012-32, Rev-3, Attachment 1D – Requirements for RAD-Specific PHA Plan and/or Significant Amendment to the PHA Plan Submissions

Until such time as the required elements may be provided in a HUD-provided form, the following items must be covered in a request for a RAD-Specific PHA Plan Submission, Significant Amendment to the PHA Plan, MTW Plan, or MTW’s revision to the MTW plan:

- 1. A description of the units to be converted. The description should include the following:*
 - a. The number of units;*
 - b. The bedroom distribution of units, and*
 - c. The type of units (e.g., family, elderly/disabled, or elderly-only);*
- 2. Any change in the number of units that is proposed as part of the conversion, including:*
 - a. De minimis unit reductions and*
 - b. Unit reductions that are exempt from the de minimis cap;*
 - c. Any change in the bedroom distribution of units that is proposed as part of the conversion;*
- 3. Changes in the policies that govern eligibility, admission, selection, and occupancy of units at the project after it has been converted.*
 - a. If Converting to PBV: This includes any waiting list preferences that will be adopted for the Covered Project as well as the Resident Rights and Participation, Tenant Protections for residents stated in Section 1.6, Attachment 1B of this Notice and the Joint Housing/PIH Notice H-2014-09/ PIH-2014-17. (See Table 1 below for more specific guidance).*
 - b. If Converting to PBRA: This includes any waiting list preferences that will be adopted for the Covered Project as well as the Resident Rights and Participation, Tenant Protections for residents stated in Section 1.7 and Attachment 1B of this Notice and the Joint Housing PIH Notice H-2014-09/ PIH-2014-17. (see Table 1 below for more specific guidance).*
- 4. If there will be a transfer of assistance at the time of conversion, the significant amendment must include:*
 - a. The number of units to be transferred;*
 - b. The bedroom distribution of the units in the new building(s), and*
 - c. The type of units, if changed (e.g., family, elderly/disabled, or elderly-only); and*
 - d. Any reduction or change in the number of units and what reduction category they fall under (i.e. de minimis)*
 - e. How the waiting list will be transferred and how households will be selected for the transfer, where applicable (please see Table 2 below for more specific guidance).*
- 5. An indication of whether the PHA is currently under a voluntary compliance agreement, consent order or consent decree or final judicial ruling or administrative ruling or decision and an assurance that compliance will not be negatively impacted by conversion activities.*
- 6. A statement certifying that the RAD conversion complies with all applicable site selection and neighborhood reviews standards and that all appropriate procedures have been followed.*
- 7. All other required information and certifications necessary to submit a Significant Amendment to the PHA Plan, including Resident Advisory Board comments and responses, challenged elements, and all required certifications.*
- 8. For MTWs utilizing MTW Fungibility as defined in Section 1.9.E and Section 1.6 or 1.7, as applicable, a statement explaining how the MTW will be able to maintain continued service level requirements.*

Additionally, in accordance with 24 CFR Part 903, a PHA must perform the following actions in regards to their Capital Funds:

- 1. During the PHA Plan submission and/or significant amendment stage, a PHA shall notify the public that the current and future Capital Fund Program Grants Budgets, will be reduced as a result of any projects converting to RAD,.*
 - a. The PHA should provide an estimate of the amount of the current Capital Fund grant that is associated with the proposed project(s) and the impact on the PHA's current Five-Year PHA Plan and Five-Year Capital Fund Action Plan.*
 - b. If the RAD conversion will impact an existing CFFP or EPC, or it proposes to utilize RHF funds to facilitate conversion, the PHA should also indicate the estimated impact of those activities.*

Finally, to avoid the need for a possible subsequent significant amendment, the PHA should examine its definition of "Substantial Deviation". The PHA may want to redefine its definition of Substantial Deviation in Section 10 of the PHA Plan to exclude the following items:

- 1. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;*
 - a. 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;*
 - b. Changes to the construction and rehabilitation plan for each approved RAD conversion; and*
 - c. Changes to the financing structure for each approved RAD conversion.*
- 2. Please Note: Approval of a PHA's Financing Plan may be delayed if a PHA has made a substantial change to its plans, as defined locally, and the PHA has not completed a new PHA Plan or Significant Amendment to its PHA Plan submission. In addition, if HUD determines that there has been a significant change to the Significant Amendment involving transfers of assistance, changes in the number of assisted units, or a change in eligibility or preferences, HUD may require that a PHA resubmit their Significant Amendment.*

No new activities planned. This plan does not modify any previously stated plans.

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

For families that are over-income for two consecutive years, HACH's policy currently increases the family's rent to fair-market-value (FMR) rent. HACH is not proposing any substantial changes to its policy for 2021.

Occupancy by Police Officers

HACH is not proposing and substantial changes to its policy concerning occupancy by police officers for 2021.

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 is not proposing any substantial changes to its no-smoking policy for 2021.

Project-Based Vouchers

HACH has no plans to offer more project-based vouchers (PBVs) in 2021 unless presented with an unplanned opportunity to deconcentrate poverty or modernize existing HACH inventory.

Units with Approved Vacancies for Modernization

HACH is not proposing and substantial changes to its use of approved vacancies for modernization. HACH will be continuing the substantial rehabilitation of vacant units as described in its *Capital Funds 5-Year Plan*.

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

No new activity planned for 2021.

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
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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, I approve the submission of the ___ 5-Year and/or X Annual PHA Plan Amendment for the PHA fiscal year beginning 2021, 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).

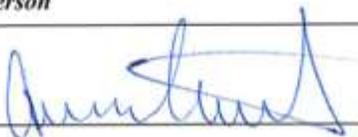
Housing Authority of the City of Hartford
PHA Name

CT003
PHA Number/HA Code

Annual PHA Plan Amendment for Fiscal Year 2021

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
Annette Sanderson	Executive Director
Signature	Date
	10/14/2020

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 prior year 2017 (see Prior Year **Finding No. 2017-001**)

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.

Questioned Cost: None.

Effect: As a result of reporting errors, on the unaudited financial statements we noted the following errors:

- Capital Assets were misstated by \$6,025,218
- Inter-program balances of \$2,538,714 were incorrectly reported and not eliminated.
- Total revenues were misstated by \$2,554,009
- Net position was misstated by \$4,676,924.

Cause: The Authority did not have the necessary controls over the financial reporting process to detect material misstatements.

Recommendation: The Authority should establish controls to ensure that appropriate year-end adjustments are recorded so that the financial statements are fairly presented.

Views of Responsible Officials of the Auditee: While this finding is a repeat of last year's, the Authority has made significant progress in rectifying the process and training issues that were previously the primary culprit in initiating this finding. The Finance Department will continue to solidify staffing levels to reduce disruptive turnover and continue with training of new and existing staff and continue to implement process improvements in order to appropriately account for material Balance Sheet transactions.

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.

For the purposes of understanding HACH's progress in meeting its PHAS goals, the following regulation is provided as a reference:

24 CFR §902.11: PHAS Performance Designations

All PHAs that receive a PHAS assessment shall receive a performance designation. The performance designation is based on the overall PHAS score and the four indicator scores, as set forth below.

(a) High performer.

(1) A PHA that achieves a score of at least 60 percent of the points available under the financial condition, physical condition, and management operations indicators and at least 50 percent of the points available under the Capital Fund indicator, and achieves an overall PHAS score of 90 percent or greater of the total available points under PHAS shall be designated a high performer. A PHA shall not be designated a high performer if it scores below the threshold established for any indicator.

(2) High performers will be afforded incentives that include relief from reporting and other requirements, as described in §902.71.

(b) Standard performer.

(1) A PHA that is not a high performer shall be designated a standard performer if the PHA achieves an overall PHAS score of at least 60 percent, and at least 60 percent of the available points for the physical condition, financial condition, and management operations indicators, and at least 50 percent of the available points for the Capital Fund indicator.

(2) At HUD's discretion, a standard performer may be required by the field office to submit and operate under a Corrective Action Plan.

(c) Substandard performer.

A PHA shall be designated a substandard performer if the PHA achieves a total PHAS score of at least 60 percent and achieves a score of less than 60 percent under one or more of the physical condition, financial condition, or management operations indicators. The PHA shall be designated as substandard physical, substandard financial, or substandard management, respectively. The HUD office with jurisdiction over the PHA shall require a Corrective Action Plan if the deficiencies have not already been addressed in a current Corrective Action Plan.

(d) Troubled performer.

(1) A PHA that achieves an overall PHAS score of less than 60 percent shall be designated as a troubled performer.

(2) In accordance with section 6(j)(2)(A)(i) of the Act (42 U.S.C. 1437d(j)(2)(A)(i)), a PHA that receives less than 50 percent under the Capital Fund program indicator under subpart E of this part will be designated as a troubled performer and subject to the sanctions provided in section 6(j)(4) of the Act (42 U.S.C. 1437(d)(j)(4)).

For the Housing Choice Voucher (HCV/Section 8) program, HUD divides the SEMAP performance scores according to this regulation:

§985.103 SEMAP score and overall performance rating.

(a) High performer rating. PHAs with SEMAP scores of at least 90 percent shall be rated high performers under SEMAP. PHAs that achieve an overall performance rating of high performer may receive national recognition by the Department and may be given competitive advantage under notices of fund availability.

(b) Standard rating. PHAs with SEMAP scores of 60 to 89 percent shall be rated standard.

(c) Troubled rating. PHAs with SEMAP scores of less than 60 percent shall be rated troubled.

Progress in Meeting HACH's Mission Described in the 5-Year Plan

HACH's Mission:

It is the mission of the Housing Authority of the City of Hartford (HACH):

- to be a fiscally sound agency*
- that provides safe, decent and affordable high-quality housing and homeownership choices.*

HACH strives to:

- become closer to our resident and community partners,*
- while being a positive catalyst for the creation of economic opportunities and independence in diverse communities.*

HACH will provide:

- a positive work environment for our employees; and*
- value-added supportive services to our residents.*

“Fiscally Sound Agency”

As demonstrated in HACH's MASS scores, noted below, HACH has turned the corner in cleaning up its core financial position. HACH will continue to improve the efficient use of its funding.

Not reflected in the MASS score is HACH's ongoing process of removing the drain of unsustainable units from its LIPH portfolio, including divesting Mary Shepard Place and many scattered sites units.

“Safe, Decent and Affordable High-quality Housing...”

HACH's conversion of its non-performing LIPH units under the RAD program is at the core of HACH's current strategy to improve the quality of housing it provides. For instance, the capital needs of Mary

Shepard Place are beyond HACH's LIPH funding and only by "disposing" of the property from LIPH can HACH fund the necessary upgrades, making it safer and better housing, while keeping it affordable.

HACH also continue to assist as needed in the development of Willow Creek (Bowles Park) and The Village at Park River (Westbrook Village).

"...and Homeownership Choices"

Willow Creek (Bowles Park) and The Village at Park River (Westbrook Village) will provide affordable homeownership choices. Though no homeownership units have been built, yet progress is being made on the overall projects.

HACH is still reviewing its HCV skill set to determine if it will begin offering HCV mortgages.

"Closer to Our Resident and Community Partners"

Over the past several years, HACH has dedicated resources to improving the governance and efficacy of its tenant organizations. With outside counsel, HACH hopes to move its tenant organizations, including its jurisdiction-wide tenant organization, into robust ventures. HACH saw encouraging progress in 2019 and will continue to push in 2020.

HACH is also exploring the use of online training and other resources to further educate the members of its resident councils on the working of a housing authority and their roles in its processes.

Much of HACH's efforts in this direction have stalled temporarily due to the COVID-19 pandemic.

"A Positive Catalyst for the Creation of Economic Opportunities and Independence"

HACH will use HUD's Section 3 program as a foundation for creating economic opportunities for LIPH and Hartford residents. In 2020, HACH hired an internal Section 3 Coordinator, bringing this skill in-house. With this dedicated resource, HACH hopes to expand its Section 3 offering.

"Positive Work Environment for our Employees"

HACH expanded its training programs in 2020, bringing institutional knowledge to an open platform that allow staff more access to the best practices in his or her functional area as well as the distribution of responsibilities and corporate performance. HACH will continue to expand this training, track usage, and roundly institutionalize HACH's mission.

"Value-added Supportive Services to our Residents"

HACH's resident support was challenged in 2020 by the COVID-19 pandemic. HACH worked to bring the same quality of support to its residents despite the trying circumstances.

Progress in Meeting HACH's Goals Described in the 5-Year Plan: PHAS Score

Agency Goal and Objective for Low-Income Public Housing Program

From the 5-Year Plan: "HACH's [2018] PHAS score makes it a Standard Performing PHA. HACH's agency goal is to increase its PHAS score. HACH's agency objective is to work toward being a High Performing PHA."

HUD provides many measures of a PHA’s performance. HACH based its goals and objectives on meeting HUD’s well-established performance objectives.

For HACH’s Low-Income Public Housing (LIPH) program, HUD uses the *Public Housing Assessment System* (PHAS) as it means of evaluating HACH’s performance. The purpose of PHAS is to improve the delivery of services in public housing and enhance trust in the public housing system among public housing agencies (PHAs), public housing residents, and the general public, by providing a management tool for effectively and fairly measuring the performance of a PHA in essential housing operations of projects, on a program-wide basis and individual project basis, and providing rewards for high performers and remedial requirements for poor performers. HUD assesses and scores the performance of projects and PHAs based on these indicators:²

- PHAS Overall Score and HUD Designation for agency:

	PHAS Score (out of 100)	HUD PHAS Designation	CT Avg.	Natl. Avg.
2012	77	Substandard Management	-	-
2013	76	Substandard Management	-	-
2014	-	-	-	-
2015	80	Substandard Management	82	87
2016	78	Substandard Management	87	87
2017	74	Substandard Management	86	86
2018	70	Standard Performer	89	-
2019	70*	Standard Performer	-	-

Note: Any score marked with a ‘-’ in the scoresheet above and the scoresheets that follow is a score not available from HUD at the time of the approval of this plan. Also, HACH’s scores for 2019, marked with an ‘’, are repeated from the prior year by HUD due to the limitations of the COVID-19 pandemic.³*

² Source: https://www.hud.gov/program_offices/public_indian_housing/reac/products/prodphasinrule, link to <https://www.hud.gov/sites/dfiles/PIH/documents/PHAScoreLatest3Years04-19-2019.xlsx>; HACH records

³ PIH-2020-05 COVID 19 Notice: For PHAs that had a PHAS score pending as of the date of this notice, and for any PHA with a fiscal year ending on or before December 31, 2020, [such as HACH] HUD did not issue a new PHAS score unless the PHA requested one [which HACH did not]. HUD instead carried forward the most recent PHAS score on record.

In the years 2015, 2016, and 2017, though HACH achieved a PHAS score above 60, it was categorized as *Substandard Management* because its MASS score (property management) was below 60%, being 48%, 44%, and 56%, respectively. And, though HACH's PHAS score is lower in 2018 and 2019, improvements in its MASS score to above 60% elevated it to *Standard Performer*.

The PHAS Score is broken down as follows:

- *Physical Assets - Physical Assessment Subsystem (PASS)*

With PASS, HUD assesses whether public housing units are decent, safe, sanitary and in good repair, and to determine the level to which the PHA is maintaining its public housing in accordance with housing condition standards.

	PASS Score (out of 40)	%	CT Avg.	Natl. Avg.
2015	33	82.5	32	35
2016	35	87.5	34	35
2017	33	82.5	34	34
2018	27	67.5	34	-
2019	27*	67.5	-	-

HUD's Real Estate Assessment Center (REAC) conducts physical property inspections of public housing assisted housing. HUD conducts inspections annually on random portions of HACH's portfolio to ensure that assisted families have housing that is decent, safe, sanitary and in good repair. Inspections scores are scaled to 100.

	Smith / Betty / Kent (AMP 6)	Stowe / COT / Mary Shepard (AMP 24)	Scatter Sites (AMP 15)
2013	-	71	75
2014	88	-	83
2015	-	-	-
2016	78	75	91
2017	86	72	-
2018	-	-	-
2019	64	78	54

- *Financial Condition - Financial Assessment Subsystem (FASS)*

With FASS, HUD assesses the financial condition of each public housing project.

	FASS Score (out of 25)	%	CT Avg.	Natl. Avg.
2015	25	100	21	22
2016	22	88	23	23
2017	17	68	22	23
2018	20	80	24	-
2019	20*	80	-	-

- *Property Management - Management Assessment Subsystem (MASS)*
With MASS, HUD assesses HACH’s property management operations capabilities, include the measures liquidity and current assets, the adequacy of the financial reserves, and the capacity to cover debt obligations.

	MASS Score (out of 25)	%	CT Avg.	Natl. Avg.
2015	12	48	20	20
2016	11	44	21	20
2017	14	56	21	20
2018	16	64	22	-
2019	16*	64	-	-

A MASS score below 60% is what pushed HACH into the *Substandard Performer* category in 2015 - 2017.

- *Grant Utilization - Capital Fund program score (CFP)*
With the CFP score, HUD examines the time it takes HACH to obligate the funds provided to it from the Capital Fund program.

	CFP Score (out of 10)	%	CT Avg.	Natl. Avg.
2012	7	70	-	-
2013	7	70	-	-
2014	-	-	-	-
2015	10	100	10	10
2016	10	100	9	9
2017	10	100	9	9
2018	7	70	9	-
2019	7*	70	-	-

[Progress in Meeting HACH’s Goals Described in the 5-Year Plan: SEMAP Score](#)

Agency Goal and Objective for Housing Choice Voucher (Section 8) Program

From the 5-Year Plan: “HACH’s SEMAP score [in 2018] makes it a High Performing PHA. HACH’s agency goal is to maintain its SEMAP score and designation. HACH’s agency objective is to improve its operating efficiency and participant services.

For HACH’s Housing Choice Voucher (HCV/Section 8) program, HUD uses its *Section Eight Management Assessment Program* (SEMAP). HUD uses SEMAP to evaluate HACH’s performance as an HCV administrator. HACH uses its SEMAP score to target HACH operational abilities that need the most improvement. SEMAP has 14 key PHA performance indicators:

- Proper selection of applicants from the housing choice voucher waiting list
- Sound determination of reasonable rent for each unit leased
- Establishment of payment standards within the required range of the HUD fair market rent
- Accurate verification of family income

- Timely annual reexaminations of family income
- Correct calculation of the tenant share of the rent and the housing assistance payment
- Maintenance of a current schedule of allowances for tenant utility costs
- Ensure units comply with the housing quality standards before families enter into leases and PHAs enter into housing assistance contracts
- Timely annual housing quality inspections
- Performing of quality control inspections to ensure housing quality
- Ensure that landlords and tenants promptly correct housing quality deficiencies
- Ensure that all available housing choice vouchers are used
- Expand housing choice outside areas of poverty or minority concentration
- Enroll families in the family self-sufficiency (FSS) program as required and help FSS families achieve increases in employment income.

	SEMAP Score (out of 100)	HUD SEMAP Designation	CT Avg.	Natl. Avg.
2016	85 (audited)	Standard Performer	-	-
2017	100	High Performer	-	-
2018	93	High Performer	-	-
2019	93*	High Performer	-	-

HACH’s SEMAP score has varied over the past few years, but HACH is not concerned. The intricacies of a SEMAP score are beyond this Plan and subject to outsized scoring penalties for some performance indicators over others, in some cases, punishing de minimis miscalculations harshly. Suffice it to say, the categorical ratings (in the most recent year, High Performer) are used by HUD when clumping similarly performing HCV programs and HACH is in the highest category.

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 does not have representation for the HCV program on its jurisdiction-wide tenant-organization. HACH uses the jurisdiction-wide tenant-organization as the RAB for the LIPH program, when possible. Otherwise, for the LIPH program, HACH selects a cross-section of officers from its Resident Councils.

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

At the 7/22/20 teleconference with the LIPH RAB, convened from the senior officers of the public housing resident councils, HACH encouraged members to comment verbally on policy. HACH explained that it was not making any significant amendments to the prior plan and sought ideas and concerns about existing policy and potential new policy.

- No comments given.

At the 8/19/20 teleconference with the LIPH RAB, HACH again encouraged members to comment verbally on concerns about existing policy and ideas for potential new policy:

- Commenter wanted to know if HACH could provide a list of HUD-required regulatory changes to the LIPH RAB for review (required regulatory changes are not considered a significant amendment to this plan).
 - *HACH Response: HACH stated that it would provide such a list as soon as its contracted regulatory monitoring firm provides material for the 2020 year.*
- Commenter wanted to know if HACH could replace HUD's repealed Earned Income Disregard (EID) program.
 - *HACH Response: In the current iteration, HUD did not eliminate the EID program. Rather, HUD reduced the effective period of EID from 48 months to 24 months. HACH sees no need to supplement that change.*

HACH provided a summary of the HUD required changes and non-significant procedural changes to the LIPH program to the LIPH RAB during the week of September 7th.

The LIPH RAB also participated in the Plan's public meeting on September 14, 2020 (see below).

HACH convened a second RAB composed of HCV participants invited to discuss HCV policy. HACH invited over 35 active HCV participants (as determined by caseworkers' recommendations) to participate in HACH's HCV RAB.

From the 8/26/20 teleconference with the HCV RAB, members were encouraged to comment verbally on concerns about existing policy and ideas for potential new policy:

- Commenter wanted to know about the HCV occupancy standards and how the voucher size is computed.
 - *HACH Response: HACH discussed the occupancy standards, in particular the members of a household that could share a bedroom with the head-of-household. HACH admitted that the language in the Admin Plan could use some improvement.*

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 14, 2020, at 5:30 p.m. via teleconference because of the COVID-19 pandemic. HACH advertised the meeting in the Hartford Courant and Identidad Latina (in Spanish) on July 30, 2020 (46 days before the meeting) and on HACH’s website on July 23, 2020 (53 days before the meeting and remaining for the duration of the notice period). The public meeting was also announced to all Low-Income Public Housing (LIPH) tenants via a postcard mailing.

After an introduction, the Housing Authority reviewed the LIPH non-significant change summary provided to the RAB in the prior week. The Housing Authority then opened the call to comments and questions.

- Commenter asked about the Housing Authority’s rapid repeat of the annual examination process.
 - *HACH Response: HACH has determined that it is more efficient to perform all annual re-examinations at the same time. HUD requires that a household examination be performed at least once per year. To adjust every tenant’s anniversary date to 1/1, the Housing Authority had to perform a second re-examination on most tenants. For tenants with anniversary dates near the end of the year, there would need to be two re-examinations in rapid succession.*

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.

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

Luke Bronin

Signature



Title

Mayor, City of Hartford

Date

8/31/20

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 submitted to HUD on April 15, 2019.

D. Other Certification Requirements

D.1 Board of Commissioners Resolution

**HOUSING AUTHORITY OF THE CITY OF HARTFORD
RESOLUTION NO. 2020-30**

Regarding the Annual PHA Plan for 2021

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 no substantial modifications to the Low-Income Public Housing *Admissions and Continued Occupancy Policy* (ACOP) 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 30, 2020, and presented and discussed:

- by members of HACH's Resident Advisory Boards, and
- at a Public Hearing held on Monday, September 14, 2020.

NOW, THEREFORE, BE IT RESOLVED that the Board of Commissioners of the Housing Authority of the City of Hartford, at its regular meeting held on Tuesday, October 13, 2020, via teleconference in accordance with the Governor of Connecticut's Executive Order 7B, dated March 14, 2020, do hereby authorize and direct:

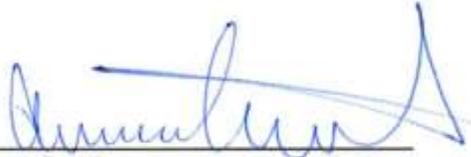
- The Chairperson of the Board of Commissioners or the Executive Director to sign the *PHA Certification of Compliance with the Annual Plan and Related Regulations*; and
- The Executive Director to sign any and all ancillary certifications, disclosures, and any other related documents that are required in the submission of the Annual PHA Plan for 2021, in order to effect the proper submission.

PASSED, ADOPTED, AND APPROVED this 13th day of October 2020.

ATTEST:



Jeffrey Stewart
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 2021, and will submit 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. Therefore, HACH 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 Program

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

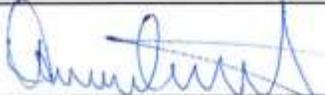
(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection 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-L.L.L., 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) 10/14/2020

Previous edition is obsolete

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

HUD Approval



U.S. Department of Housing and Urban Development

Hartford Field Office
Office of Public Housing
20 Church Street, 10th Floor
Hartford, Connecticut 06103-3220
E-mail Address: Jennifer.R.Gottlieb@hud.gov

Telephone: (860) 240-9757
Facsimile: (860) 240-4854
TTY: (860) 240-4665

December 3, 2020

Ms. Annette Sanderson
Executive Director
Housing Authority City of Hartford
180 John D. Wardlaw Way
Hartford, CT 06106

SUBJECT: PHA Plan FY 2021 – Housing Authority City of Hartford (HACH) – CT003
Approval of Annual PHA Plan

Dear Ms. Sanderson:

The Hartford Housing Authority's submission of its Annual PHA Plan (CT003v01) for the fiscal year beginning January 1, 2021 is approved.

This approval of the PHA Plan does not constitute an endorsement of the strategies and policies outlined in the plan. In providing assistance to families under programs covered by this plan, the HACH will comply with the rules, standards, and policies established in its approved plan as provided in 24 CFR Part 903 and other applicable regulations. Your approved plan and all required attachments and documents must be made available for review and inspection at the principal office of the Hartford HA during normal business hours.

If you have any questions regarding your PHA Plan or the information in this letter, please contact Joan Strielkauskas, Portfolio Management Specialist, at (860) 240-9777 or by electronic mail joan.m.strielkauskas@hud.gov.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer R. Gottlieb Elazhari".

Jennifer R. Gottlieb Elazhari
HUD Office of Public and Indian Housing
CT Public Housing Director