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| <b>Streamlined Annual<br/>PHA Plan<br/>(High Performer PHAs)</b> | <b>U.S. Department of Housing and Urban<br/>Development<br/>Office of Public and Indian Housing</b>  | <b>OMB No. 2577-0226<br/>Expires 03/31/2024</b> |
|  | <p><b>Purpose.</b> The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low-income, very low-income, and extremely low-income families.</p> <p><b>Applicability.</b> Form HUD-50075-HP is to be completed annually by <b>High Performing PHAs</b>. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA <u>do not</u> need to submit this form.</p> <p><b>Definitions.</b></p> <ol style="list-style-type: none"> <li>(1) <b>High-Performer PHA</b> – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a higher performer on <u>both</u> of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.</li> <li>(2) <b>Small PHA</b> – A PHA that is not designated as PHAS or SEMAP troubled or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.</li> <li>(3) <b>Housing Choice Voucher (HCV) Only PHA</b> – A PHA that administers more the 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.</li> <li>(4) <b>Standard PHA</b> – 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.</li> <li>(5) <b>Troubled PHA</b> – A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent</li> <li>(6) <b>Qualified PHA</b> – A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.</li> </ol> |   |
| <b>A</b>   | <b>PHA Information.</b>  |   |
| <b>A.1</b>   | <p><b>PHA Name:</b> <u>Housing Authority of the City of Brownsville</u>      <b>PHA Code:</b> <u>TX007</u></p> <p><b>PHA Type:</b> <input checked="" type="checkbox"/> High Performer</p> <p><b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>07/2025</u></p> <p><b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning above)</p> <p><b>Number of Public Housing (PH) Units:</b> <u>185</u></p> <p><b>Number of Housing Choice Voucher (HCVs):</b> <u>2855</u></p> <p><b>Total Combined Units/Vouchers:</b> <u>3040</u></p> <p><b>PHA Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission   <input type="checkbox"/> Revised Annual Submission</p>   |   |

A.1

**Availability of Information.** In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. 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.

**The following are the specific locations where the public may obtain copies of the 2025 Annual PHA Plan:**

- Administrative Office – 2606 Boca Chica Blvd., Brownsville, TX 78521

☐ **PHA Consortia:** (Check box if submitting a joint PHA Plan and complete table below)

| Participating PHAs | PHA Code | Program(s) in the Consortia | Programs Not in the Consortia | No. of Units in Each Program |     |
|--------------------|----------|-----------------------------|-------------------------------|------------------------------|-----|
|                    |          |                             |                               | PH                           | HCV |
| Lead HA:           |          |                             |                               |                              |     |
|                    |          |                             |                               |                              |     |
|                    |          |                             |                               |                              |     |
|                    |          |                             |                               |                              |     |

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| <b>B</b>   | <b>Plan Elements</b>  |
| <b>B.1</b> | <p><b>Revision of Existing PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last <b>Annual <u>PHA Plan</u></b> submission?</p> <p>Y    N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element below:</p> <p><b>Statement of Housing Needs and Strategy for Addressing Housing Needs</b></p> <p><b><u>Statement of Housing Needs:</u></b></p> <p>The change in population, household size, availability of rental housing, income and condition of property are all factors of housing needs in our community. The Housing Authority of the City of Brownsville (HACB) complies with the City of Brownsville 2021-2025 Consolidated Plan in addressing the housing needs of Brownsville residents, by providing affordable housing with a suitable living environment, and through community-based public service programs. The HACB and its affiliates serve <b>3,929</b> families across the City of Brownsville through the public housing, Housing Tax Credit, Rental Assistance Demonstration Program, and Housing Choice Voucher programs.</p> <p>Our responsibility is not just to expand affordable housing opportunities but also to create choices to empower families, target obsolete properties, and replace them with modern quality housing units of adequate size, amenities, and features.</p> <p>The HACB will address the housing needs and goals by following the Strategic Plan goals for each year (see Strategic Plan Goals). <i>(See attachment tx007d01)</i></p> |

**B.1**

**Waiting List for Public Housing (AMP 9 – Sanchez Vela):**

*Total: 242*

*Extremely Low Income: 222-92%*

*Very Low Income: 8-3%*

*Low Income: 12-5%*

*Families with children: 103-43%*

*Families with Disabilities: 4-2%*

*White: 1-0.41%*

*Black/African American: 20-8%*

*Asian: 1-0.41%*

*Hispanic: 220-91%*

*Bedrooms:*

*3 BR: 242-100%*

*The waiting list has been closed for 6 months. The PHA does not expect to reopen the waiting list in the PHA Plan year.*

**Waiting List for Public Housing (AMP 10 – Tangelo Quarters):**

*Total: 514*

*Extremely Low Income: 453-88%*

*Very Low Income: 39-8%*

*Low Income: 22-4%*

*Families with children: 273-53%*

*Elderly Families: 3-0.58%*

*Families with Disabilities: 23-4%*

*White: 9-2%*

*Black/African American: 48-9%*

*Asian: 2-0.39%*

*Hispanic: 455-88.5%*

*Bedrooms:*

*2 BR: 292-57%*

*3 BR: 222-43%*

*The waiting list has been closed for 6 months. The PHA does not expect to reopen the waiting list in the PHA Plan year.*



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| B.1 | <p><b><u>Waiting List for Public Housing (AMP 6 – Tropical Gardens):</u></b></p> <p><i>Total: 427</i><br/> <i>Extremely Low Income: 364-85%</i><br/> <i>Very Low Income: 45-10.5%</i><br/> <i>Low Income: 18-4%</i><br/> <i>Elderly Families: 74-17%</i><br/> <i>Families with Disabilities: 77-18%</i><br/> <i>Black/African American: 1-0.23%</i><br/> <i>Hispanic: 426-100%</i></p> <p><i>Bedrooms:</i><br/> <i>1 BR: 162-38%</i><br/> <i>2 BR: 141-33%</i><br/> <i>3 BR: 124-29%</i></p> <p><i>The waiting list has been closed for 1 month. The PHA does not expect to reopen the waiting list in the PHA Plan year.</i></p> <p><b><u>Waiting List for Public Housing (AMP 24 – Sunset Haven):</u></b></p> <p><i>Total: 3</i><br/> <i>Very Low Income: 3-100%</i><br/> <i>Elderly Families: 2-67%</i><br/> <i>Families with Disabilities: 1-33%</i><br/> <i>White: 1-33%</i><br/> <i>Hispanic: 2-67%</i></p> <p><i>Bedrooms:</i><br/> <i>1 BR: 3-100%</i></p> <p><i>The waiting list is not closed.</i></p> <p><b><u>Waiting List for Section 8</u></b></p> <p><i>Total: 711</i><br/> <i>Extremely Low Income: 597-84%</i><br/> <i>Very Low Income: 98-14%</i><br/> <i>Low Income: 16-2%</i><br/> <i>Families with children: 89-12.5%</i><br/> <i>Elderly families: 119-17%</i><br/> <i>Families with Disabilities: 126-18%</i><br/> <i>White: 20-3%</i><br/> <i>Black/African American: 11-2%</i><br/> <i>American Indian/Alaska Native: 1-0.14%</i></p> |
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**B.1** *Hispanic: 679-95%*

*The waiting has been closed for 12 months. The PHA does expect to reopen the waiting list in PHA Plan year. The PHA does permit specific categories of families onto the waiting list, even if generally closed.*

**Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions**

**Public Housing**

**Deconcentration and Income Mixing:**

*The PHA has performed its annual deconcentration and income mixing analysis to determine if the PHA has any general occupancy public housing developments covered by the deconcentration rule. The analysis results follow:*

*The PHA does have general occupancy public housing developments covered by the deconcentration rule.*

*The following covered developments have an average income that falls above or below the Established Income Range.*

| Deconcentration Policy for Covered Developments |                 |  |  |
|---|-----------------|--|--|
| Development Name:                               | Number of Units | Explanation (if any) [see step 4 at §903.2(c)(1)(iv)]  | Deconcentration policy (if no explanation) [see step 5 at §903.2(c)(1)(v)] |
| <i>Sanchez Vela</i>                             | <i>30</i>       | <i>The covered development size, location and/or configuration promote income deconcentration, such as scattered site or small development</i> |  |
| <i>Tangelo Quarters Phase I</i>                 | <i>18</i>       | <i>The covered development size, location and/or configuration promote income deconcentration, such as scattered site or small development</i> |  |
| <i>Tropical Gardens</i>                         | <i>58</i>       | <i>The covered development size, location and/or configuration promote income deconcentration, such as scattered site or small development</i> |  |

**B.1****Financial Resources**

| <b>Financial Resources:<br/>Planned Sources and Uses</b>                      |                        |                           |
|---|------------------------|---------------------------|
| <b>Sources</b>  | <b>Planned \$</b>      | <b>Planned Uses</b>       |
| <b>1. Federal Grants (FY 2025 grants)</b>                                     |                        |                           |
| a) Public Housing Operating Fund  | 531,070.00             |                           |
| b) Public Housing Capital Fund  | 383,437.00             |                           |
| c) HOPE VI Revitalization   |                        |                           |
| d) HOPE VI Demolition   |                        |                           |
| e) Annual Contributions for Section 8<br>Tenant-Based Assistance              | 21,253,385.00          |                           |
| f) Resident Opportunity and Self-<br>Sufficiency Grants                       | 264,002.83             |                           |
| g) Community Development Block Grant  |                        |                           |
| h) HOME   |                        |                           |
| Other Federal Grants (list below)   |                        |                           |
| <b>2. Prior Year Federal Grants<br/>(unobligated funds only) (list below)</b> |                        |                           |
|   |                        |                           |
| <b>3. Public Housing Dwelling Rental<br/>Income</b>                           | 226,303.00             | Public housing operations |
| <b>4. Other income</b> (list below)   |                        |                           |
|   |                        |                           |
| <b>5. Non-federal sources</b> (list below)                                    |                        |                           |
|   |                        |                           |
| <b>Total resources</b>  | <b>\$22,658,197.83</b> |                           |
|   |                        |                           |

**Violence Against Women Act (VAWA)***(See attachment tx007c01)*

- c) The PHA must submit its Deconcentration Policy for Field Office Review. *(See attachment tx007b01)*

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| <b>B.2</b> | <p><b>New Activities.</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y    N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Project-Based Vouchers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA</p> <p><b>Mixed Finance Modernization or Development</b></p> <p><i>Tangelo Quarters Phase II</i></p> <p><i>Tangelo Quarter Phase II construction started in September 2023 and was completed in September 2024. This development consists of five (5) public housing single-detached two-bedroom homes. Replacement Housing Factor Grant funds and Capital funds were used.</i></p> <p><i>El Jardin</i></p> <p><i>HUD approved the transfer of the Victoria Gardens CHAP to El Jardin, a historic building under renovation. In 2021, the HACB's non-profit BHOC was awarded \$11.8 million in 9% LIHTC allocation by the TDHCA for rehabilitating El Jardin. This building is at 1114 E. Levee Street in the downtown Brownsville Historic District. It will consist of 44 affordable housing units. BHOC has applied for Federal and State historic tax credits that will aid in the rehabilitation of El Jardin. It is anticipated that the construction will be completed by June 2025.</i></p> |
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**B.2**

***Buena Vida***

***In July 2024, HACB's non-profit BHOC was awarded \$56.4 million in a 9% LIHTC allocation for the redevelopment of Buena Vida. This will be used to demolish and construct three (3) new developments: a senior complex with 80 units, a multi-family complex with 80 units, and a supportive housing complex with 50 – 212 affordable new modern units. This will be a RAD conversion under the HUD's new "Faircloth to RAD Program". It is anticipated that a new construction will start in July 2025.***

**Demolition/Disposition Activity Description**

The HACB is considering applying for disposition/demolition on the following three (3) developments under AMP 1.

- Buena Vida Development 150 units TX007010101 (Please note that no deed of trust is attached to said property nor will HUD funds be used for demolition).
- Bougainvillea Development 50 units TX007010101 (At RAD closing HUD funds were allocated for future demolition purposes). Demolition will occur in 2024.
- Victoria Gardens Development 46 units TX007010101 (At RAD closing HUD funds were allocated for future demolition purposes). Demolition will occur in 2025.

Once demolished, HACB is considering the redevelopment of Buena Vida, Bougainvillea, and Victoria Gardens. Buena Vida families were relocated in 2020/2021. Buena Vida is pending to be demolished. No HUD funds will be utilized. As noted in prior PHA Plans, HACB intends to utilize the Faircloth to RAD program and leverage it with a 9% HTC's. HACB is submitting three 9% HTC applications in 2024.

Bougainvillea families were relocated in 2022. HACB is requesting SHPO and COB HPO approval to demolish the property. The goal is to procure a contractor for demolition in mid-2024. HACB will request COB to include this site in one of their existing converted revitalization plans. The goal is to apply for a 9% HTC application in 2025.

Families from these two sites were informed of the relocation process and the Board of Commissioners approved a relocation plan for these properties, to include Victoria Gardens. At this time, families from Victoria Gardens remain at the property. Relocation to El Jardin or other alternative housing options will take place in Q4 2024 and Q1 2025.

**Progress Report**

***El Jardin, 2021/2023 9% HTC Award, 44 RAD Tax Credit Units-***

***The project is anticipated to reach substantial completion by the end of June 2025. It received the first certificate of occupancy in November 2024. HACB then executed the RAD HAP contract with EL Jardin, to be effective December 1, 2024. The families from Victoria Gardens Public Housing development are the ones first being offered the option to relocate to El Jardin. Regardless of their decision to relocate to El Jardin or another site, the families are being offered assistance with relocation costs and needs. The El Jardin is Housing***

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| B.2 | <p><b><i>Strategy Phase I of the International Southmost HUD Choice Neighborhood Plan. The Brownsville Housing Opportunity Corporation (BHOC) is the sole Developer and General Partner for this project. BHOC will have the Right of First Refusal at the end of the 15-year compliance period. Total development cost is approximately \$29.3 million dollars.</i></b></p> <p><b><i>Avanti Legacy del Sol, 2023 9% HTC, 84 Tax Credit Units-</i></b><br/> <b><i>The Brownsville Housing Opportunity Corporation (BHOC), an affiliated non-profit owned by the Housing Authority of the City of Brownsville, is the General Partner for this project. BHOC will have the Right of First Refusal at the end of the 15-year compliance period. The project received a force majeure in November 2024 by TDHCA, therefore extending the placed in-service deadline to December 2026. Project closed on January 31, 2025, and construction began on February 3, 2025. The Developer for this project is affiliated with Madhouse Development. The total tax credits awarded were \$20 million dollars.</i></b></p> <p><b><i>Buena Vida Supportive Housing, 2024 9% HTC, 50 RAD Tax Credit Units-</i></b><br/> <b><i>This is one of three tax credit projects awarded by TDHCA in the 2024 round. The name of the property is pending to be chosen. This is in partnership with Friendship of Women, a non-profit organization providing services to families who are victims of domestic violence. This project is part of the re-development of the former Buena Vida Public Housing site, which is the anchor of the Buena Vida HUD Choice Neighborhood Plan. It also is part of the Housing Strategy Phase II of said plan. HACB will utilize the Faircloth to RAD program with the 9% HTC program. Please note HACB received the NARR in February 2024 and submitted the development proposal in February 2025. The expected closing date is May 2025. The placed in-service date is December 2026. Co-developers are Versa Development and The Brownsville Housing Opportunity Corporation (BHOC), an affiliated non-profit owned by the Housing Authority of the City of Brownsville. BHOC is also the General Partner of the Limited Partnership. This project also received an Affordable Housing Program Grant from the Federal Home Loan Bank of Dallas, in the amount of \$1.7 million dollars. The total tax credits awarded was \$16.4 million dollars.</i></b></p> <p><b><i>Buena Vida Family, 2024 9% HTC, 80 RAD Tax Credit Units-</i></b><br/> <b><i>This is one of three tax credit projects awarded by TDHCA in the 2024 round. The name of the property is pending to be chosen. This project is part of the re-development of the former Buena Vida Public Housing site, which is the anchor of the Buena Vida HUD Choice Neighborhood Plan. It also is part of the Housing Strategy Phase II of said plan. HACB will utilize the Faircloth to RAD program with the 9% HTC program. Please note HACB received the NARR in February 2024 and submitted the development proposal in February 2025. The expected closing date is May 2025. The placed in-service date is December 2026. Co-developers are Versa Development and The Brownsville Housing Opportunity Corporation (BHOC), an affiliated non-profit owned by the Housing Authority of the City of Brownsville. BHOC is also the General Partner of the Limited Partnership. The total tax credits awarded was \$20 million dollars.</i></b></p> |
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| B.2 | <p><b><i>Buena Vida Senior, 2024 9% HTC, 82 RAD Tax Credit Units-</i></b><br/> <i>This is one of three tax credit projects awarded by TDHCA in the 2024 round. The name of the property is pending to be chosen. This project is part of the re-development of the former Buena Vida Public Housing site, which is the anchor of the Buena Vida HUD Choice Neighborhood Plan. It also is part of the Housing Strategy Phase II of said plan. HACB will utilize the Faircloth to RAD program with the 9% HTC program. Please note HACB received the NARR in February 2024 and submitted the development proposal in February 2025. The expected closing date is May 2025. The placed in-service date is December 2026. Co-developers are Versa Development and The Brownsville Housing Opportunity Corporation (BHOC), an affiliated non-profit owned by the Housing Authority of the City of Brownsville. BHOC is also the General Partner of the Limited Partnership. The total tax credits awarded was \$20 million dollars.</i></p> <p><b><i>Victoria Gardens, 2025 9% HTC application, 84 Tax Credit Units-</i></b><br/> <i>The Brownsville Housing Opportunity Corporation (BHOC) in partnership with Versa Development will apply for a 9% HTC application in the amount of \$20 million dollars. The goal is to redevelop Victoria Gardens which was the anchor site of the International Southmost HUD Choice Neighborhood Project. This is Phase II of the Housing Strategy outlined in the Plan. HACB will consider the possibility of entering into a HAP PBV Contract for this project, post award. Procurement procedures and HUD requirements will be adhered to. Total housing tax credit amount to be requested is approximately, \$20 million dollars. Awards will be announced in July 2025.</i></p> <p><b><i>Future Development Projects:</i></b></p> <ul style="list-style-type: none"> <li><i>• Re-development of Bougainvillea in 2026, utilizing the 9% HTC program and PBV program. HACB will also consider this site to be a supportive housing community.</i></li> <li><i>• Development of Boca Chica land in 2026, utilizing the 9% HTC program and RAD program. Requesting a Transfer of Assistance related to Sanchez Vela, 30 units and Tangelo Quarters Phase I and II.</i></li> <li><i>• Rehabilitation/Renovation of Paseo Plaza and both Rancho del Cielo properties, utilizing the 4% bond reservation held by the Brownsville Housing Finance Corporation.</i></li> </ul> <p><b><i>Investor Buyout and Refinance of the following existing tax credit sites:</i></b></p> <ul style="list-style-type: none"> <li><i>• Candlewick Apartments – refinance of loan which matures November 2025 and buyout of Special Limited Partner.</i></li> <li><i>• Sunset Haven Apartments – finalization of refinance of loan in Q1/Q2 2024.</i></li> </ul> <p><b><i>Real Estate Strategies:</i></b></p> <ul style="list-style-type: none"> <li><i>• Exploring options of elderly site, Villa Del Sol. Consideration to request HUD approval to transfer assistance to a new site due to the condition of the property. Analyzing the option of selling said property.</i></li> </ul> |
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| B.2 | <p>HACB has utilized the RAD CHAP at two new sites: Poinsettia Gardens at Boca Chica and Trail Village. HUD approved the transfer of a third CHAP to a new site under construction. The CHAP is from Victoria Gardens and the new site is El Jardin. Construction and RAD closing occurred in July 2023. New site will be completed in early 2025. The following is more detail of this transaction. In 2021 the HACB's non-profit BHOC was awarded \$11.8 million in 9% LIHTC allocation by PFC's was allocated a bond reservation. It is the intent for one of the non-profits to co-develop a property with a partner developer.</p> <p>HACB will explore the use of CFP funds for Sunset Haven and will explore opportunities requesting the use of CFP funds to include PH units in our LIHTC credit properties. HACB will explore requesting a CHAP for SH's 30 PH units.</p> <p>The HACB will also consider converting the PH units at Tropical Gardens to RAD Vouchers.</p> <p>HACB is currently constructing 5 additional PH units, which are referred to as Tangelo Quarters Phase II. HUD approved the development construction plan for Tangelo Quarters Phase II in April 2023. The Construction started in September 2023 and is anticipated to end in September 2024. Replacement Housing Factor Grant funds and Capital Fund Program funds will be used. If available, we will leverage the RAD program via the transfer of assistance of a CHAP letter to the Boca Chica property.</p> <p>HACB will use the Faircloth to RAD program to build new affordable housing and leverage this with the tax credit program, either a 4% or 9%. HACB is specifically looking at the redevelopment of Buena Vida for this financing strategy. On behalf of HACB, BHOC submitted three 9% 2024 applications, of which two will utilize the Faircloth to RAD program. HACB submitted the required reservation request in the RAD Resource Desk.</p> <p>The HACB plans to use Capital Fund Program and Replacement Housing Factor funds for new development once existing old developments have been demolished.</p> <p>HACB and Partner COB were awarded a Choice Neighborhood Planning Grant for the International Southmost Neighborhood that includes Victoria Gardens. The award was made in November 2021, and the project was completed in November 2023. The Plan has been submitted to HUD for review and approval.</p> |
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B.2

| Demolition/Disposition Activity Description   |
|---|
| 1a. Development name: <i>Buena Vida Development</i>   |
| 1b. Development (project) number: <i>TX007010101</i>  |
| 2. Activity type: <i>Demolition</i> <input checked="" type="checkbox"/><br>Disposition <input type="checkbox"/>   |
| 3. Application status (select one)<br>Approved <input type="checkbox"/><br><i>Submitted, pending approval</i> <input checked="" type="checkbox"/><br>Planned application <input type="checkbox"/> |
| 4. Date application approved, <i>submitted</i> , or planned for submission: <u><i>1/20/2025</i></u>   |
| 5. Number of units affected: <i>150</i>   |
| 6. Coverage of action (select one)<br><input type="checkbox"/> Part of the development<br><input checked="" type="checkbox"/> <i>Total development</i>  |
| 7. Timeline for activity:<br>a. Actual or projected start date of activity: <u><i>3/5/2025</i></u><br>b. Projected end date of activity: <u><i>5/25/2025</i></u>                                  |

| Demolition/Disposition Activity Description   |
|---|
| 1a. Development name: <i>Bougainvillea Development</i>  |
| 1b. Development (project) number: <i>TX007010101</i>  |
| 2. Activity type: <i>Demolition</i> <input checked="" type="checkbox"/><br>Disposition <input type="checkbox"/>   |
| 3. Application status (select one)<br><i>Approved</i> <input checked="" type="checkbox"/><br>Submitted, pending approval <input type="checkbox"/><br>Planned application <input type="checkbox"/> |
| 4. Date application <i>approved</i> , submitted, or planned for submission: <u><i>08/31/2022</i></u>  |
| 5. Number of units affected: <i>50</i>  |
| 6. Coverage of action (select one)<br><input type="checkbox"/> Part of the development<br><input checked="" type="checkbox"/> <i>Total development</i>  |
| 7. Timeline for activity:<br>a. Actual or projected start date of activity: <u><i>3/2025</i></u><br>b. Projected end date of activity: <u><i>5/2025</i></u>                                       |

**B.2**

| Demolition/Disposition Activity Description                                 |   |
|---|---|
| 1a. Development name:   | <i>Victoria Gardens Development</i>   |
| 1b. Development (project) number:   | <i>TX007010101</i>  |
| 2. Activity type:   | <i>Demolition</i> <input checked="" type="checkbox"/><br>Disposition <input type="checkbox"/>   |
| 3. Application status (select one)  | <i>Approved</i> <input checked="" type="checkbox"/><br>Submitted, pending approval <input type="checkbox"/><br>Planned application <input type="checkbox"/> |
| 4. Date application <i>approved</i> , submitted, or planned for submission: | <i>07/12/2024</i>   |
| 5. Number of units affected:  | <i>46</i>   |
| 6. Coverage of action (select one)  | <input type="checkbox"/> Part of the development<br><input checked="" type="checkbox"/> <i>Total development</i>  |
| 7. Timeline for activity:   | a. Actual or projected start date of activity: <i>10/2025</i><br>b. Projected end date of activity: <i>2/2026</i>   |

**Conversion of Public Housing to Project-Based Assistance under RAD**  
(See attachment tx007f01)

**Units with Approved Vacancies for Modernization**  
*AMP 6 casualty loss – TX007010106, unit 1105.*

**B.3**

**Progress Report.**

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.

**Mission**

To increase opportunities for affordable, quality housing and support self-sufficiency through collaborative partnership.

**Our Vision**

**Housing:** Increase the number of high-quality, well-managed, affordable units that are responsive to the needs of the community.

**People:** Improve health, safety, employment, mobility, and educational outcomes with responsive and relevant resources delivered to our community.

|     |   |
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| B.3 | <p><b>Community:</b> Create the conditions necessary for public and private investment in community assets and amenities that will help families live their best lives.</p> <p><b><u>Goals/Objectives</u></b></p> <p><b>HOUSING: TO PROMOTE AFFORDABLE HOUSING AND INCREASE PORTFOLIO.</b></p> <p><b>PEOPLE: TO INCREASE THE NUMBER OF HOUSEHOLDS SERVED.</b></p> <p><b>COMMUNITIES: TO CREATE RESILIENT COMMUNITIES THROUGH COLLABORATIVE INITIATIVES AND LEVERAGING OF RESOURCES.</b></p> <p><b>ORGANIZATION AND CAPACITY.</b></p> <p><b>ENSURE EQUAL OPPORTUNITY IN HOUSING FOR ALL AMERICANS.</b></p> <p><b><u>Progress Statement:</u></b> <i>See attachment tx007h01</i></p> |
| B.4 | <p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) in EPIC and the date that it was approved.</p> <p><i>See Capital Fund 5 Year Action Plan in EPIC approved by HUD on <u>09/26/2024</u></i></p>   |
| B.5 | <p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y   N<br/> <input checked="" type="checkbox"/>   <input type="checkbox"/></p> <p>(b) If yes, please describe: <i>HUD form 9886 Authorization for Release of Information was missing in 18 files. Verification of income was missing in one file.</i></p>  |
| C.  | <p><b>Other Document and/or Certification Requirements.</b></p>   |
| C.1 | <p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y   N<br/> <input checked="" type="checkbox"/>   <input type="checkbox"/></p>  |

|            |   |
|------------|---|
| <b>C.1</b> | (b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. <i>(See attachment tx007a01)</i>   |
| <b>C.2</b> | <b>Certification by State or Local Officials.</b><br><br><i>Form HUD 50077-SL, 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.   |
| <b>C.3</b> | <b>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b><br><br><i>Form 50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations - Including PHA Plan Elements that Have Changed</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.   |
| <b>C.4</b> | <b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.<br><br>(a) Did the public challenge any elements of the Plan?<br><br><div style="display: flex; justify-content: space-around;"> <span>Y<br/><input type="checkbox"/></span> <span>N<br/><input checked="" type="checkbox"/></span> </div> If yes, include Challenged Elements. <i>N/A</i>   |
| <b>D.</b>  | <b>Affirmatively Furthering Fair Housing (AFFH).</b>  |
| <b>D.1</b> | <b>Affirmatively Furthering Fair Housing (AFFH).</b><br><br>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.<br><br><b>Fair Housing Goal: Ensure Equal Opportunity in Housing for all Americans</b><br><br>The HACB will ensure equal opportunity and affirmatively further fair housing by:<br><br>Undertaking affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability. |

|     |   |
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| D.1 | <p>Undertaking affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, and disability.</p> <p>Undertaking affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of the unit size required.</p> <p><b>Status:</b></p> <p>The HACB continues to provide information and education to potential participants and residents.</p> <p>The HACB continues to provide opportunities for staff to obtain ongoing training in fair housing regulations.</p> |
|-----|---|

| <b>5-Year PHA Plan<br/>(for All PHAs)</b> | <b>U.S. Department of Housing and Urban<br/>Development<br/>Office of Public and Indian Housing</b>  | <b>OMB No. 2577-0226<br/>Expires 03/31/2024</b> |                               |                              |                             |                               |                              |  |  |  |  |  |    |     |          |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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|   | <p><b>Purpose.</b> 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.</p> <p><b>Applicability.</b> Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.</p>  |   |                               |                              |                             |                               |                              |  |  |  |  |  |    |     |          |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| <b>A</b>                                  | <b>PHA Information.</b>  |   |                               |                              |                             |                               |                              |  |  |  |  |  |    |     |          |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| <b>A.1</b>                                | <p><b>PHA Name:</b> <u>Housing Authority of the City of Brownsville</u><br/> <b>PHA Code:</b> <u>TX007</u><br/> <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>07/2025</u><br/> <b>PHA Submission Type:</b> <input checked="" type="checkbox"/> 5-Year Plan Submission   <input type="checkbox"/> Revised 5-Year Plan Submission</p> <p><b>Availability of Information.</b> In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. 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 websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><b>The following are the specific locations where the public may obtain copies of the 2025 5-Year PHA Plan:</b></p> <ul style="list-style-type: none"> <li>▪ Administrative Office – 2606 Boca Chica Blvd., Brownsville, TX 78521</li> </ul> <p><input type="checkbox"/> <b>PHA Consortia:</b> (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 style="width: 25%;">Participating PHAs</th> <th style="width: 10%;">PHA Code</th> <th style="width: 25%;">Program(s) in the Consortia</th> <th style="width: 25%;">Programs Not in the Consortia</th> <th colspan="2" style="width: 15%;">No. of Units in Each Program</th> </tr> <tr> <th></th> <th></th> <th></th> <th></th> <th style="width: 5%;">PH</th> <th style="width: 5%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead HA:</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> <tr> <td></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 | Programs Not in the Consortia | No. of Units in Each Program |  |  |  |  |  | PH | HCV | Lead HA: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Participating PHAs                        | PHA Code   | Program(s) in the Consortia                     | Programs Not in the Consortia | No. of Units in Each Program |                             |                               |                              |  |  |  |  |  |    |     |          |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|   |  |   |                               | PH                           | HCV                         |                               |                              |  |  |  |  |  |    |     |          |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Lead HA:                                  |  |   |                               |                              |                             |                               |                              |  |  |  |  |  |    |     |          |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| <b>B</b>   | <b>Plan Elements.</b> Required for <u>all</u> PHAs completing this form   |
| <b>B.1</b> | <p><b>Mission.</b> State the PHA’s mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA’s jurisdiction for the next five years.</p> <p>To increase opportunities for affordable, quality housing and support self-sufficiency through collaborative partnership.</p> <p><b><u>Our Vision</u></b></p> <p><b>Housing:</b> Increase the number of high-quality, well-managed, affordable units that are responsive to the needs of the community.</p> <p><b>People:</b> Improve health, safety, employment, mobility, and educational outcomes with responsive and relevant resources delivered to our community.</p> <p><b>Community:</b> Create the conditions necessary for public and private investment in community assets and amenities that will help families live their best lives.</p>  |
| <b>B.2</b> | <p><b>Goals and Objectives.</b> Identify the PHA’s quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years.</p> <p><b>PHA GOAL #1: EXPAND THE SUPPLY OF ASSISTED HOUSING</b></p> <p>The PHA established the following objectives to strive in meeting goal #1:</p> <ul style="list-style-type: none"> <li>▪ <i>Apply for additional rental vouchers</i></li> <li>▪ <i>Reduce public housing vacancies</i></li> <li>▪ <i>Leverage private or other public funds to create additional housing opportunities</i></li> <li>▪ <i>Acquire or build units or developments</i></li> </ul> <p><b>PHA GOAL #2: IMPROVE THE QUALITY OF ASSISTED HOUSING</b></p> <p>The PHA established the following objectives to strive in meeting goal #2:</p> <ul style="list-style-type: none"> <li>▪ <i>Improve public housing management (PHAS score)</i></li> <li>▪ <i>Improve voucher management (SEMAP score)</i></li> <li>▪ <i>Increase customer satisfaction</i></li> <li>▪ <i>Concentrate on efforts to improve specific management functions (e.g., public housing finance; voucher unit inspections)</i></li> <li>▪ <i>Renovate or modernize public housing units</i></li> <li>▪ <i>Demolish or dispose of obsolete public housing</i></li> <li>▪ <i>Provide replacement public housing</i></li> <li>▪ <i>Provide replacement vouchers</i></li> </ul> |

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| B.2 | <p><b>PHA GOAL #3: INCREASE ASSISTED HOUSING CHOICES</b></p> <p>The PHA established the following objectives to strive in meeting goal #3</p> <ul style="list-style-type: none"> <li>▪ <i>Provide voucher mobility counseling</i></li> <li>▪ <i>Conduct outreach efforts to potential voucher landlords</i></li> <li>▪ <i>Increase voucher payment standards</i></li> <li>▪ <i>Implement voucher homeownership program</i></li> <li>▪ <i>Implement public housing or other homeownership programs</i></li> <li>▪ <i>Implement public housing site-based waiting lists</i></li> <li>▪ <i>Convert public housing to vouchers</i></li> </ul> <p><b>PHA GOAL #4: PROVIDE AN IMPROVED LIVING ENVIRONMENT</b></p> <p>The PHA established the following objectives to strive in meeting goal #4</p> <ul style="list-style-type: none"> <li>▪ <i>Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments</i></li> <li>▪ <i>Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments</i></li> <li>▪ <i>Implement public housing security improvements</i></li> <li>▪ <i>Designate developments or buildings for particular resident groups (elderly, persons with disabilities)</i></li> </ul> <p><b>PHA GOAL #5: PROMOTE SELF-SUFFICIENCY AND ASSET DEVELOPMENT OF ASSISTED HOUSEHOLDS</b></p> <p>The PHA established the following objectives to strive in meeting goal #5</p> <ul style="list-style-type: none"> <li>▪ <i>Increase the number and percentage of employed persons in assisted families</i></li> <li>▪ <i>Provide or attract supportive services to improve assistance recipients' employability</i></li> <li>▪ <i>Provide or attract supportive services to increase independence for the elderly or families with disabilities</i></li> </ul> <p><b>PHA GOAL #6: ENSURE EQUAL OPPORTUNITY AND AFFIRMATIVELY FURTHER FAIR HOUSING</b></p> <p>The PHA established the following objectives to strive in meeting goal #6</p> <ul style="list-style-type: none"> <li>▪ <i>Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability</i></li> <li>▪ <i>Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status and disability</i></li> <li>▪ <i>Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required</i></li> </ul> |
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| B.3 | <p><b><u>Progress Statements.</u></b> Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.</p> <p><b><u>Goals/Objectives</u></b></p> <p><b>HOUSING: TO PROMOTE AFFORDABLE HOUSING AND INCREASE PORTFOLIO.</b></p> <p><b>PEOPLE: TO INCREASE THE NUMBER OF HOUSEHOLDS SERVED.</b></p> <p><b>COMMUNITIES: TO CREATE RESILIENT COMMUNITIES THROUGH COLLABORATIVE INITIATIVES AND LEVERAGING OF RESOURCES.</b></p> <p><b>ORGANIZATION AND CAPACITY.</b></p> <p><b>ENSURE EQUAL OPPORTUNITY IN HOUSING FOR ALL AMERICANS.</b></p> <p><b><u>Progress Statement:</u></b> <i>See attachment tx007h01</i></p>  |
| B.4 | <p><b>Violence Against Women Act (VAWA) Goals.</b> Provide a statement of the PHA’s goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. <i>(See attachment tx007c01)</i></p>   |
| C.  | <p><b>Other Document and/or Certification Requirements.</b></p>   |
| C.1 | <p><b>Significant Amendment or Modification.</b> Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.</p> <p><b><u>Significant Amendment or Modification to the Annual and Five-Year Action Plan</u></b></p> <ul style="list-style-type: none"> <li>▪ Any increase or decrease over 50% in the funds projected in the Financial Resource Statement and/or the Capital Fund Program Annual Statement.</li> <li>▪ Any submission to HUD that requires a separate notification or resident limited Hope VI, Public Housing Conversion, Demolition/Disposition, Designated Housing or Homeownership programs unless that change is a result of circumstances identified by HUD for special intervention including the Rental Assistance Demonstration Program; and</li> <li>▪ Any Change inconsistent with the local, approved consolidated plan, at the discretion of the Chief Executive Officer.</li> </ul> <p><b><u>Substantial Deviation from the Five-Year Plan</u></b></p> <ul style="list-style-type: none"> <li>▪ Any change to the Mission Statement.</li> <li>▪ 50% deletion from or addition to the goals and objectives, as whole; and</li> <li>▪ 50% or more decrease in the quantifiable measurement of any individual goal or objective.</li> </ul> |

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| C.1 | <p><b><u>Exclude from Substantial Deviation from the Five-Year Plan</u></b></p> <ul style="list-style-type: none"> <li>▪ The decision to convert to either Project-Based Rental Assistance or Project-Based Voucher Assistance.</li> <li>▪ The date the Significant Amendment is submitted to the PHA Plan website.</li> <li>▪ Change to Capital Fund Budget produces as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital funds.</li> <li>▪ Change to the construction and rehabilitation plan for each approved RAD conversion.</li> <li>▪ Change to the financing structure for each approved RAD conversion.</li> </ul> |
| C.2 | <p><b>Resident Advisory Board (RAB Comments.</b></p> <p>(a) Did the RAB(s) provide comments to the 5-Year PHA Plan?</p> <p>Y    N<br/> <input checked="" type="checkbox"/>   <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. <i>(See attachment tx007a01)</i></p>  |
| C.3 | <p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>   |
| C.4 | <p><b>Required Submission of HUD FO Review</b></p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y    N<br/> <input type="checkbox"/>   <input checked="" type="checkbox"/></p> <p>(b) If yes, include Challenged Elements. <i>N/A</i></p>  |
| D.  | <p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p>  |
| D.1 | <p><b>Affirmatively Furthering Fair Housing (AFFH).</b> (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)</p> <p>Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the</p>                    |

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| D.1 | <p>requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <p><b>Fair Housing Goal: Ensure Equal Opportunity in Housing for all Americans</b></p> <p>The HACB will ensure equal opportunity and affirmatively further fair housing by:<br/>Undertaking affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability.</p> <p>Undertaking affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, and disability.</p> <p>Undertaking affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of the unit size required.</p> <p><b>Status:</b></p> <p>The HACB continues to provide information and education to potential participants and residents.</p> <p>The HACB continues to provide opportunities for staff to obtain ongoing training in fair housing regulations.</p> |
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Capital Fund Program - Five-Year Action Plan

Status: Draft

Approval Date:

Approved By:

|  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|
| <b>Part I: Summary</b>   |  |  |  |  |  |  |
| <b>PHA Name :</b> Housing Authority of the City of Brownsville |  | <b>Locality (City/County &amp; State)</b>  |  |  |  |  |
| <b>PHA Number:</b> TX007                                       |  | <input checked="" type="checkbox"/> <b>Original 5-Year Plan</b> <input type="checkbox"/> <b>Revised 5-Year Plan (Revision No:            )</b> |  |  |  |  |
| <b>A.</b>  | <b>Development Number and Name</b>           | <b>Work Statement for<br/>Year 1    2025</b>   | <b>Work Statement for<br/>Year 2    2026</b> | <b>Work Statement for<br/>Year 3    2027</b> | <b>Work Statement for<br/>Year 4    2028</b> | <b>Work Statement for<br/>Year 5    2029</b> |
|  | TANGELO QUARTERS (TX007010110)               | \$15,000.00  | \$15,000.00                                  | \$15,000.00                                  | \$15,000.00                                  |  |
|  | SANCHEZ-VELA (TX007010109)                   | \$20,000.00  | \$15,000.00                                  | \$15,000.00                                  | \$15,000.00                                  |  |
|  | AUTHORITY-WIDE                               | \$162,998.00   | \$146,711.00                                 | \$279,997.00                                 | \$143,997.00                                 | \$179,997.00                                 |
|  | SUNSET HAVEN (TX007000024)                   | \$59,000.00  | \$23,286.00                                  | \$50,000.00                                  | \$110,000.00                                 | \$100,000.00                                 |
|  | TROPICAL GARDENS AT BOCA CHICA (TX007010106) | \$122,999.00   | \$180,000.00                                 | \$20,000.00                                  | \$96,000.00                                  | \$100,000.00                                 |

Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
02/28/2022

| Part II: Supporting Pages - Physical Needs Work Statements (s) |   |  |          |                |
|--|---|--|----------|----------------|
| Work Statement for Year 1 2025                                 |   |  |          |                |
| Identifier   | Development Number/Name   | General Description of Major Work Categories   | Quantity | Estimated Cost |
|  | TANGELO QUARTERS (TX007010110)  |  |          | \$15,000.00    |
| ID0000156  | Exterior and building repairs(Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Dumpsters and Enclosures,Dwelling Unit-Site Work (1480)-Fence Painting,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Other,Non-Dwelling Site Work (1480)-Asphalt - Concrete - Paving,Non-Dwelling Site Work (1480)-Dumpster and Enclosures,Non-Dwelling Site Work (1480)-Fence Painting,Non-Dwelling Site Work (1480)-Fencing,Non-Dwelling Site Work (1480)-Playground Areas - Equipment) | Driveway and asphalt repairs, install 17 concrete pads for trash enclosures, and replace trash enclosures. |          | \$15,000.00    |
|  | SANCHEZ-VELA (TX007010109)  |  |          | \$20,000.00    |
| ID0000157  | Appliance replacement(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Other)   | Replacement of 30 stoves and refrigerators.  |          | \$15,000.00    |
| ID0000174  | Appliance and HVAC system replacement(Dwelling Unit-Exterior (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System)   | Replace 5 HVAC system units  |          | \$5,000.00     |
|  | AUTHORITY-WIDE (NAWASD)   |  |          | \$162,998.00   |
| ID0000158  | Operations(Operations (1406))   | Operations Expense   |          | \$95,498.30    |

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| Part II: Supporting Pages - Physical Needs Work Statements (s) |   |   |          |                |
|--|---|---|----------|----------------|
| Work Statement for Year 1 2025                                 |   |   |          |                |
| Identifier   | Development Number/Name   | General Description of Major Work Categories  | Quantity | Estimated Cost |
| ID0000159  | Management Improvements(Management Improvement (1408)-Security Improvements (not police or guard-non-physical),Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements,Management Improvement (1408)-Other)  | Board training<br>Upgrade software  |          | \$10,000.00    |
| ID0000161  | Fees and Costs(Contract Administration (1480)-Audit,Contract Administration (1480)-Other,Contract Administration (1480)-Other Fees and Costs,Dwelling Unit - Conversion (1480))   | Architect/Engineers Fees and Costs, Professional Services/consultant, printing and advertising costs. Capital Needs Assessment.         |          | \$16,000.00    |
| ID0000162  | Non Dwelling Structure and Equipment(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)   | CFP vehicle repairs and upkeep, gasoline expense, CFP tools, and safety equipment.  |          | \$3,000.00     |
| ID0000163  | Audit(Contract Administration (1480)-Audit)   | Audit fees  |          | \$500.00       |
| ID0000169  | Administrative Expense(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)   | COCC  |          | \$37,999.70    |
|  | SUNSET HAVEN (TX007000024)  |   |          | \$59,000.00    |
| ID0000164  | Complete bath room renovation in 30 units(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers) | Replacement of tub/shower stalls, faucets, sinks sink faucets, and vanity and plumbing fixtures.<br>Replacement of Stoves/Refrigerators |          | \$59,000.00    |

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| Part II: Supporting Pages - Physical Needs Work Statements (s) |  |  |          |                |
|--|--|--|----------|----------------|
| Work Statement for Year 1 2025                                 |  |  |          |                |
| Identifier   | Development Number/Name  | General Description of Major Work Categories   | Quantity | Estimated Cost |
|  | TROPICAL GARDENS AT BOCA CHICA (TX007010106)   |  |          | \$122,999.00   |
| ID0000165  | Complete Unit Renovation 58 units(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers) | Replacement of kitchen countertops, sinks, and faucets including plumbing.<br>Replacement of cabinets, floors, carpet, doors, electrical covers and fixtures,<br>replacement of bathtub/shower stalls, sinks, and vanity including plumbing.<br>Replacement of appliances stoves and refrigerators |          | \$100,000.00   |
| ID0000166  | Non-dwelling exterior repairs(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Other,Non-Dwelling Exterior (1480)-Balconies and Railings,Non-Dwelling Exterior (1480)-Landings and Railings,Non-Dwelling Exterior (1480)-Lighting,Non-Dwelling Exterior (1480)-Other)   | Exterior repairs: balcony and railings, landing and railings, lighting, and concrete pads for the AC condenser.  |          | \$22,999.00    |
|  | Subtotal of Estimated Cost   |  |          | \$379,997.00   |

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| Part II: Supporting Pages - Physical Needs Work Statements (s) |   |   |          |                |
|--|---|---|----------|----------------|
| Work Statement for Year 2 2026                                 |   |   |          |                |
| Identifier   | Development Number/Name   | General Description of Major Work Categories  | Quantity | Estimated Cost |
|  | TROPICAL GARDENS AT BOCA CHICA (TX007010106)  |   |          | \$180,000.00   |
| ID0000178  | Exterior repairs(Non-Dwelling Exterior (1480)-Gutters - Downspouts,Non-Dwelling Exterior (1480)-Siding,Non-Dwelling Exterior (1480)-Soffits,Non-Dwelling Exterior (1480)-Windows,Non-Dwelling Exterior (1480)-Canopies)             | Replacement of siding, soffits, and windows, lighting, canopies, gutters, and downspouts. |          | \$80,000.00    |
| ID0000186  | HVAC replacement(Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Mechanical)   | Replace 30 HVAC systems including plumbing fixtures.                                      |          | \$100,000.00   |
|  | SANCHEZ-VELA (TX007010109)  |   |          | \$15,000.00    |
| ID0000179  | Exterior repairs(Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits) | Replace siding, soffits, gutters, downspouts, exterior lighting.                          |          | \$15,000.00    |
|  | AUTHORITY-WIDE (NAWASD)   |   |          | \$146,711.00   |
| ID0000180  | Nondwelling Structures/Equipment(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)   | CFP vehicle upkeep and gas expense<br>CFP tools/safety equipment<br>CFP vehicles Repairs  |          | \$3,000.00     |



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| Part II: Supporting Pages - Physical Needs Work Statements (s) |  |   |          |                |
|--|--|---|----------|----------------|
| Work Statement for Year 2 2026                                 |  |   |          |                |
| Identifier   | Development Number/Name  | General Description of Major Work Categories  | Quantity | Estimated Cost |
| ID0000181  | Operations(Operations (1406))  | Operation expenses  |          | \$75,712.00    |
| ID0000182  | Administration(Administration (1410)-Other)  | COCC  |          | \$37,999.00    |
| ID0000183  | Management Improvements(Management Improvement (1408)-Empowerment Activities,Management Improvement (1408)-Other,Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)   | Staff and Board training, Relocation Coordinator, Technical Assistance.                         |          | \$9,000.00     |
| ID0000184  | Fees and Costs(Contract Administration (1480)-Other Fees and Costs,Contract Administration (1480)-Other)   | Architect/Engineers Fees/Cost<br>Professional Services Consultant<br>Printing, Advertising cost |          | \$21,000.00    |
|  | TANGELO QUARTERS (TX007010110)   |   |          | \$15,000.00    |
| ID0000185  | Painting (Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing) | Interior painting 10 units  |          | \$15,000.00    |
|  | SUNSET HAVEN (TX007000024)   |   |          | \$23,286.00    |

Form HUD-50075.2(4/2008)

Form HUD-50075.2(4/2008)

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| Part II: Supporting Pages - Physical Needs Work Statements (s) |  |  |          |                |
|--|--|--|----------|----------------|
| Work Statement for Year 3 2027                                 |  |  |          |                |
| Identifier   | Development Number/Name  | General Description of Major Work Categories   | Quantity | Estimated Cost |
|  | TANGELO QUARTERS (TX007010110)   |  |          | \$15,000.00    |
| ID0000194  | Site improvements(Non-Dwelling Exterior (1480)-Foundation,Non-Dwelling Exterior (1480)-Lighting,Non-Dwelling Exterior (1480)-Other)  | Construct 10 concrete slabs for trash cans, and lighting improvements.   |          | \$15,000.00    |
|  | SUNSET HAVEN (TX007000024)   |  |          | \$50,000.00    |
| ID0000195  | Exterior repairs(Non-Dwelling Site Work (1480)-Asphalt - Concrete - Paving,Non-Dwelling Site Work (1480)-Curb and Gutter,Non-Dwelling Site Work (1480)-Fence Painting,Non-Dwelling Site Work (1480)-Fencing,Non-Dwelling Site Work (1480)-Lighting,Non-Dwelling Site Work (1480)-Playground Areas - Equipment,Non-Dwelling Site Work (1480)-Signage) | Asphalt, concrete, curve, and gutters repairs. Fence painting, lighting replacements, signage replacements, Barbeque grills replacement. |          | \$50,000.00    |
|  | SANCHEZ-VELA (TX007010109)   |  |          | \$15,000.00    |
| ID0000196  | Appliance replacement(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Other)  | Replace 10 stoves & 10 Refrigerators   |          | \$15,000.00    |
|  | TROPICAL GARDENS AT BOCA CHICA (TX007010106)   |  |          | \$20,000.00    |

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| Part II: Supporting Pages - Physical Needs Work Statements (s) |  |  |          |                |
|--|--|--|----------|----------------|
| Work Statement for Year 4 2028                                 |  |  |          |                |
| Identifier   | Development Number/Name  | General Description of Major Work Categories   | Quantity | Estimated Cost |
|  | AUTHORITY-WIDE (NAWASD)  |  |          | \$143,997.00   |
| ID0000198  | Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)  | COCC   |          | \$37,999.00    |
| ID0000199  | Management Improvements(Operations (1406))   | Staff and Board Training   |          | \$10,000.00    |
| ID0000202  | Operations(Operations (1406))  | Operations cost  |          | \$95,998.00    |
|  | TANGELO QUARTERS (TX007010110)   |  |          | \$15,000.00    |
| ID0000200  | Unit renovation(Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing) | Replace ceiling fans, blinds, sink and kitchen faucets, 15 glass window panes, and interior painting. Exterior paint and caulking. |          | \$15,000.00    |
|  | SANCHEZ-VELA (TX007010109)   |  |          | \$15,000.00    |

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| Part II: Supporting Pages - Physical Needs Work Statements (s) |  |  |          |                |
|--|--|--|----------|----------------|
| Work Statement for Year 4 2028                                 |  |  |          |                |
| Identifier   | Development Number/Name  | General Description of Major Work Categories | Quantity | Estimated Cost |
| ID0000201  | Appliance replacement(Dwelling Unit-Interior (1480)-Appliances)  | Replace 15 stoves and 15 refrigerators       |          | \$15,000.00    |
|  | SUNSET HAVEN (TX007000024)   |  |          | \$110,000.00   |
| ID0000203  | HVAC replacement(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other)  | Replace 30 AC units                          |          | \$110,000.00   |
|  | TROPICAL GARDENS AT BOCA CHICA (TX007010106)   |  |          | \$96,000.00    |
| ID0000204  | Replacemenet of 28 HVAC systems(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing) | Complete replacement of HVAC systems.        |          | \$96,000.00    |
|  | Subtotal of Estimated Cost   |  |          | \$379,997.00   |

Capital Fund Program - Five-Year Action Plan

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| Part II: Supporting Pages - Physical Needs Work Statements (s) |  |   |          |                |
|--|--|---|----------|----------------|
| Work Statement for Year 5 2029                                 |  |   |          |                |
| Identifier   | Development Number/Name  | General Description of Major Work Categories                                      | Quantity | Estimated Cost |
|  | AUTHORITY-WIDE (NAWASD)  |   |          | \$179,997.00   |
| ID0000205  | Operations(Operations (1406))  | Operation Cost  |          | \$111,998.00   |
| ID0000206  | Administration Expenses(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)   | COCC  |          | \$37,999.00    |
| ID0000207  | Management Improvements(Management Improvement (1408)-Empowerment Activities,Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)   | Staff and Board training  |          | \$10,000.00    |
| ID0000209  | Fees & Costs(Contract Administration (1480)-Audit,Contract Administration (1480)-Other,Contract Administration (1480)-Other Fees and Costs)  | Architect & Engineering Fees, Professional Services, consultant, advertising cost |          | \$20,000.00    |
|  | SUNSET HAVEN (TX007000024)   |   |          | \$100,000.00   |
| ID0000208  | Sunset Haven(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing) | Kitchen cabinet and countertop replacement.                                       |          | \$100,000.00   |



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| Part II: Supporting Pages - Physical Needs Work Statements (s) |   |  |          |                |
|--|---|--|----------|----------------|
| Work Statement for Year 5 2029                                 |   |  |          |                |
| Identifier   | Development Number/Name   | General Description of Major Work Categories   | Quantity | Estimated Cost |
|  | TROPICAL GARDENS AT BOCA CHICA (TX007010106)  |  |          | \$100,000.00   |
| ID0000210  | Tropical Gardens(Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Other) | Ceiling Fan Replacement, Windows, and patio door replacement. Door and Entry door locks replacement. |          | \$100,000.00   |
|  | Subtotal of Estimated Cost  |  |          | \$379,997.00   |

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| Part III: Supporting Pages - Management Needs Work Statements (s)  |                |
|--|----------------|
| Work Statement for Year 1  | 2025           |
| Development Number/Name<br>General Description of Major Work Categories  | Estimated Cost |
| Housing Authority Wide   |                |
| Operations(Operations (1406))  | \$95,498.30    |
| Management Improvements(Management Improvement (1408)-Security Improvements (not police or guard-non-physical),Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements,Management Improvement (1408)-Other) | \$10,000.00    |
| Fees and Costs(Contract Administration (1480)-Audit,Contract Administration (1480)-Other,Contract Administration (1480)-Other Fees and Costs,Dwelling Unit - Conversion (1480))  | \$16,000.00    |
| Non Dwelling Structure and Equipment(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)  | \$3,000.00     |
| Audit(Contract Administration (1480)-Audit)  | \$500.00       |
| Administrative Expense(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)  | \$37,999.70    |

|   |                |
|---|----------------|
| Part III: Supporting Pages - Management Needs Work Statements (s)       |                |
| Work Statement for Year 1 2025  |                |
| Development Number/Name<br>General Description of Major Work Categories | Estimated Cost |
| Subtotal of Estimated Cost  | \$162,998.00   |

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| <b>Part III: Supporting Pages - Management Needs Work Statements (s)</b>   |                       |
|--|-----------------------|
| <b>Work Statement for Year</b> 2   | 2026                  |
| <b>Development Number/Name</b><br><b>General Description of Major Work Categories</b>  | <b>Estimated Cost</b> |
| Housing Authority Wide   |                       |
| Nondwelling Structures/Equipment(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)  | \$3,000.00            |
| Operations(Operations (1406))  | \$75,712.00           |
| Administration(Administration (1410)-Other)  | \$37,999.00           |
| Management Improvements(Management Improvement (1408)-Empowerment Activities,Management Improvement (1408)-Other,Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements) | \$9,000.00            |
| Fees and Costs(Contract Administration (1480)-Other Fees and Costs,Contract Administration (1480)-Other)   | \$21,000.00           |
| Subtotal of Estimated Cost   | \$146,711.00          |

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| <b>Part III: Supporting Pages - Management Needs Work Statements (s)</b>  |                       |
|---|-----------------------|
| <b>Work Statement for Year</b> 3  | 2027                  |
| <b>Development Number/Name</b><br><b>General Description of Major Work Categories</b>   | <b>Estimated Cost</b> |
| Housing Authority Wide  |                       |
| Management Improvements(Management Improvement (1408)-Equal Opportunity,Management Improvement (1408)-Other,Management Improvement (1408)-System Improvements,Management Improvement (1408)-Empowerment Activities) | \$37,000.00           |
| PH Wide Nondwelling Structure Equipment(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)  | \$6,500.00            |
| Administration(Administration (1410)-Other)   | \$37,999.00           |
| Fees and Costs(Contract Administration (1480)-Audit,Contract Administration (1480)-Other,Contract Administration (1480)-Other Fees and Costs)   | \$21,000.00           |
| Operations(Operations (1406))   | \$97,498.00           |
| Agency Wide(Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Other,Non-Dwelling Exterior (1480)-Other)   | \$80,000.00           |

Form HUD-50075.2(4/2008)

# Capital Fund Program - Five-Year Action Plan

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| Part III: Supporting Pages - Management Needs Work Statements (s)                                       |                |
|---|----------------|
| Work Statement for Year   | 4 2028         |
| Development Number/Name<br>General Description of Major Work Categories                                 | Estimated Cost |
| Housing Authority Wide  |                |
| Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry) | \$37,999.00    |
| Management Improvements(Operations (1406))  | \$10,000.00    |
| Operations(Operations (1406))   | \$95,998.00    |
| Subtotal of Estimated Cost  | \$143,997.00   |

Capital Fund Program - Five-Year Action Plan

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| <b>Part III: Supporting Pages - Management Needs Work Statements (s)</b>   |                       |
|--|-----------------------|
| <b>Work Statement for Year</b> 5   | 2029                  |
| <b>Development Number/Name</b><br><b>General Description of Major Work Categories</b>  | <b>Estimated Cost</b> |
| Housing Authority Wide   |                       |
| Operations(Operations (1406))  | \$111,998.00          |
| Administration Expenses(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)   | \$37,999.00           |
| Management Improvements(Management Improvement (1408)-Empowerment Activities,Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements) | \$10,000.00           |
| Fees & Costs(Contract Administration (1480)-Audit,Contract Administration (1480)-Other,Contract Administration (1480)-Other Fees and Costs)                                  | \$20,000.00           |
| Subtotal of Estimated Cost   | \$179,997.00          |



**Attachment: tx007a01**  
**Housing Authority of the City of Brownsville**  
**Resident Advisory Board Consultation Process and Comments –**  
**FYB 2025**

1. Resident notification of appointment to the Advisory Board

At beginning of PHA Plan process, sent out letter to all residents/participants of opportunity to serve on Resident Advisory Board  
**November 6, 2024**

2. Resident Advisory Board Selection

**We have an existing Board.**

3. Meeting Organization

Notify Resident Advisory Board of scheduled meeting **January 2, 2025**

Hold Resident Advisory Board meeting **January 7, 2025**

4. Notification of Public Hearing

Schedule date for Public Hearing and place ad **January 31, 2025**

Notify Resident Advisory Board **January 7, 2025**

Hold Public Hearing meeting **March 19, 2025**

5. Documentation of resident recommendations and PHA's response to recommendations



# HOUSING AUTHORITY OF THE CITY OF BROWNSVILLE

## 2025 AGNECY ANNUAL PLAN AND 2025-2029 FIVE YEAR CF ACTION PLAN

### RAB MEETING

Location: Supportive Service Building

Date: February 7, 2025

Time: 5: 00 P.M.

Please Sign Below:

- |                              |                                      |
|------------------------------|--------------------------------------|
| 1. Cecilia Espindola         | 24. Citrus Garden's                  |
| 2. Laura Viana               | 25. Pensietta Gardens                |
| 3. Santa Lopez (Linda Vista) | 26.                                  |
| 4. Maria Irene Carrera       | 27. Citrus Garden annex              |
| 5. Maria Reyes               | 28. Citrus Garden                    |
| 6. Ana Trejo                 | 29. Supp Svcs. Dir.                  |
| 7. Rose Mary Rodriguez       | 30. ROSS Coordinator                 |
| 8. Isabel Nunez              | 31. HACB Housing Facilities Director |
| 9.                           | 32.                                  |
| 10.                          | 33.                                  |
| 11.                          | 34.                                  |
| 12.                          | 35.                                  |
| 13.                          | 36.                                  |
| 14.                          | 37.                                  |
| 15.                          | 38.                                  |
| 16.                          | 39.                                  |
| 17.                          | 40.                                  |
| 18.                          | 41.                                  |
| 19.                          | 42.                                  |
| 20.                          | 43.                                  |
| 21.                          | 44.                                  |
| 22.                          | 45.                                  |
| 23.                          | 46.                                  |

## Housing Authority of the City of Brownsville

Residents Advisory Board recommendation(s) for PHA Five Year/Annual Plan are below. Pursuant to 903.13, (c), "The PHA must consider the recommendations of the Resident Advisory Board(s) in preparing the final Five Year/Annual Plan. In submitting the final plan to HUD for approval, the PHA must include a copy of the recommendations made by the Resident Advisory Board(s) and a description of the manner in which the PHA addressed these recommendations."

- Mrs. Villarreal president of the RAB is in agreement with the suggested repairs for the properties mentioned. She also stated that the units need to be well taken care of.
- Mrs. Lopez is also in agreement with suggested repairs and she mentioned that the kitchens in Linda Vista need to be addressed.
- Mrs. Espinola stated that rugs should be removed at Citrus Gardens and that shoes need to be replaced.
- Mrs. Cabrera commented that repairs should be done in a timely manner, that stoves and refrigerators need to be replaced by new ones, and that units should be maintained and issued in good conditions to new tenants.

The resident meeting was adjourned by the Meeting Officer after residents had fully discussed issues and concerns. The Housing Authority made every effort to incorporate resident concerns into the Five Year/Annual Plan.

Juanita Villarreal  
Signature, Resident Advisory Board Chairperson

Date 07/07/2025

(Use additional sheets, if necessary)

# HOUSING AUTHORITY OF THE CITY OF BROWNSVILLE



## CAPITAL FUND PROGRAM CF 2025 Annual and Five-Year Plan PRESENTATION OF ANNUAL STATEMENT

Date: January 7, 2025

Time: 5:00 pm

Name: Laura Viccinal

Title:

Address: 341 OAK APT 815

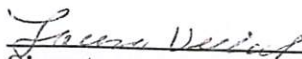
Development Name: Ponsiella Gardens

City: Brownsville, Texas 78521

Phone: 956-483-8526

Comments: mi opinion de como se cuidan los APTS.  
donde vivimos

I, the undersigned, hereby declare that I have been provided with information on the above CFP Annual Statement.

  
Signature

# HOUSING AUTHORITY OF THE CITY OF BROWNSVILLE



## CAPITAL FUND PROGRAM CF 2025 Annual and Five-Year Plan PRESENTATION OF ANNUAL STATEMENT

Date: January 7, 2025

Time: 5:00 pm

Name: Maria Irene Cabrera

Title: Presidente Citrus Garden amst

Address: 73 Orange St.

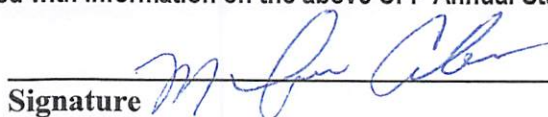
Development Name:

City: Brownsville, Texas 78521

Phone: (956) 7806093

Comments: Que hagan reparaciones seguido que no se tarden  
tanto Hieleras nuevas y estufas, y entreguen  
en buenas condiciones las casas.

I, the undersigned, hereby declare that I have been provided with information on the above CFP Annual Statement.

  
Signature



# HOUSING AUTHORITY OF THE CITY OF BROWNSVILLE



## CAPITAL FUND PROGRAM CF 2025 Annual and Five-Year Plan PRESENTATION OF ANNUAL STATEMENT

Date: January 7, 2025

Time: 5:00 pm

Name: Cecilia Espindola Title: Presidenta Citrus Gardens  
Asociacion

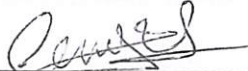
Address: 2100 Grapefruit Apt 200 Development Name: Cecilia Espindola (1)

City: Brownsville, Texas 78521

Phone: (956) 280 66 55

Comments: Quitar alambres de Citrus Gardens y reemplazar estufas

I, the undersigned, hereby declare that I have been provided with information on the above CFP Annual Statement.

  
Signature

# HOUSING AUTHORITY OF THE CITY OF BROWNSVILLE



## CAPITAL FUND PROGRAM CF 2025 Annual and Five-Year Plan PRESENTATION OF ANNUAL STATEMENT

Date: Tuesday January 7, 2025

Time: 5:00 pm.

Name: Santa M Lopez Title: President (Linda Vista)


Address: 602 Old Port Isabel rd. Development Name: Linda Vista.

City: Brownsville, Texas 78521

Phone: 956.8015600

Comments: Proyectos muy buenos a futuro ojala se  
lleven a cabo y no se olviden de Linda Vista  
en especifico sus coamas. gracias.

I, the undersigned, hereby declare that I have been provided with information on the above CFP Annual Statement.

  
Signature

## Resident Sign In Sheet

Type of Meeting

- ☐ Resident Meeting
- ☐ Public Hearing
- ☐ Training
- ☐ Other-

Location: Victoria Gardens

Date: 01/08/25 Time: 5:00 pm

Event/Session Title:

Public Housing Resident Meeting

Total # People Attending:           

Please Sign Below:

- |                             |           |
|-----------------------------|-----------|
| 1. <u>Luzia G. GONZALEZ</u> | 26. _____ |
| 2. <u>Pablo Rodriguez</u>   | 27. _____ |
| 3. <u>Eduardo Nieto</u>     | 28. _____ |
| 4. <u>Sosim Rodriguez</u>   | 29. _____ |
| 5. <u>Orlando D. Dario</u>  | 30. _____ |
| 6. <u>Maria D. Lomas</u>    | 31. _____ |
| 7. <u>Maria G. Lopez</u>    | 32. _____ |
| 8. <u>Jose-Rosario</u>      | 33. _____ |
| 9. <u>Yolanda Lopez</u>     | 34. _____ |
| 10. <u>Mariana Saucedo</u>  | 35. _____ |
| 11. <u>Leticia Martinez</u> | 36. _____ |
| 12. <u>Griselida G.</u>     | 37. _____ |
| 13. <u>Rosacina Garcia</u>  | 38. _____ |
| 14. <u>Octaviana Mijia</u>  | 39. _____ |
| 15. <u>Yozelin Hingosa</u>  | 40. _____ |
| 16. <u>Miriam Garcia</u>    | 41. _____ |
| 17. <u>Isabel Nunez</u>     | 42. _____ |
| 18. <u>Yelena Bando</u>     | 43. _____ |
| 19. _____                   | 44. _____ |
| 20. _____                   | 45. _____ |
| 21. _____                   | 46. _____ |
| 22. _____                   | 47. _____ |
| 23. _____                   | 48. _____ |
| 24. _____                   | 49. _____ |

By signing in on this form I grant permission for any images or video footage taken of my youth (under 18 years of age) or myself, in whole or in part, individually or in conjunction with other images and video footage, to be displayed on the HACB website and other official channels, and to be used for media purpose including in print, on the Internet, promotional presentations, and marketing campaigns. I am over 18 years of age or I am 19 years of age and the parent or legal guardian of the youth, and I have read this waiver and am familiar with its content.

## Agenda de la Junta de la Asociación de Residentes de Vivienda Publica

**Date/Fecha:** January 8, 2025 (Wednesday)/

**08 de Enero de 2025 (Miercoles)**

**Place/ Lugar:** 1809 Grant Street -Victoria Gardens Opportunity Center

**Time/Hora:** 5:00 pm

**I.** Call to Order / **Llamar al Orden**

**II.** Roll call / **Lista de miembros presentes**

- a. Presidente- Lilia Gutierrez
- b. Vicepresidente-
- c. Tesorera-
- d. Secretaria- Letty Martinez
- e. Coordinadora de Eventos-

**III.** Treasury Report/**Reporte de Tesoreria**

**IV.** Presenter/**Presentadora**

Sandra Garza, Community Relations III  
**Superior Health Plan**

**V.** Isabel Nunez, *Director of Housing Facilities-*  
**2025-2029 Annual and Five-Year Plan Update/**  
**Actualización del Plan Anual y Quinquenal 2025-2029**

**VI.** El Jardín Update/**Presentación de El Jardín**

**VII.** Announcements/**Avisos:**

**VIII.** Ideas, Comments and Closing /**Ideas, Comentarios y Clausura**



# HOUSING AUTHORITY OF THE CITY OF BROWNSVILLE



## CAPITAL FUND PROGRAM CF 2025 Annual and Five-Year Plan PRESENTATION OF ANNUAL STATEMENT

Date: January 8, 2025

Time: 5:00 pm

Name: Yolanda Lopez

Title:

Address: 1800 Brant St.

Development Name: Victoria Garden

City: Brownsville, Texas 78521

Phone: 956-372-05-76

Comments: no queda mas por estar aqui  
no se que sea prioridad hoy  
yo creo que yo estoy bien

I, the undersigned, hereby declare that I have been provided with information on the above CFP Annual Statement.

Signature

Yolanda Lopez

# HOUSING AUTHORITY OF THE CITY OF BROWNSVILLE



## CAPITAL FUND PROGRAM CF 2025 Annual and Five-Year Plan PRESENTATION OF ANNUAL STATEMENT

Date: January 8, 2025

Time: 5:00 pm.

Name: Octaviana Mejia

Title:

Address: 102 Lee Dr. 3A

Development Name:

City: Brownsville, Texas 78521

Phone: 956-213-4526

Comments: Chapas, Ventanas, seguros

I, the undersigned, hereby declare that I have been provided with information on the above CFP Annual Statement.

Signature

Octaviana Mejia





# HOUSING AUTHORITY OF THE CITY OF BROWNSVILLE

## CAPITAL FUND PROGRAM CF 2025 Annual and Five-Year Plan PRESENTATION OF ANNUAL STATEMENT

Date: January 8, 2025

Time: 5:00 pm

Name: MARIA A ESPINOZA

Title:

Address: 1804 Branks

Development Name:

City: Brownsville, Texas 78521

Phone:

Comments: Todo de acuerdo

I, the undersigned, hereby declare that I have been provided with information on the above CFP Annual Statement.

Signature



# HOUSING AUTHORITY OF THE CITY OF BROWNSVILLE

## CAPITAL FUND PROGRAM CF 2025 Annual and Five-Year Plan PRESENTATION OF ANNUAL STATEMENT

Date: January 8, 2025

Time: 5:00 pm

Name: Maria D. Lamas

Title:

Address: 1810 Grant St

Development Name:

City: Brownsville, Texas 78521

Phone:

Comments: Arreglio en las Ventanas porque no sierran bien algunas

I, the undersigned, hereby declare that I have been provided with information on the above CFP Annual Statement.

Signature

# HOUSING AUTHORITY OF THE CITY OF BROWNSVILLE



## CAPITAL FUND PROGRAM CF 2025 Annual and Five-Year Plan PRESENTATION OF ANNUAL STATEMENT

Date: January 8, 2025

Time: 5:00 pm

Name: Jose M Rodriguez

Title:

Address: 1816 Grand St

Development Name:

City: Brownsville, Texas 78521

Phone: 956 801 5698

Comments:

Necesito pintura

I, the undersigned, hereby declare that I have been provided with information on the above CFP Annual Statement.

Signature

José M Rdz

# HOUSING AUTHORITY OF THE CITY OF BROWNSVILLE



## CAPITAL FUND PROGRAM CF 2025 Annual and Five-Year Plan PRESENTATION OF ANNUAL STATEMENT

Date: January 8, 2025

Time: 5:00 pm.

Name: Eduardo Nieto

Title:

Address: 2004 Intervat, W 4th Blvd

Development Name:

City: Brownsville, Texas 78521

Phone: 956-510-4252

Comments: I need a micro to heat meals  
and wall heater on. please

I, the undersigned, hereby declare that I have been provided with information on the above CFP Annual Statement.

Signature

[Signature]



THE CITY OF BROWNSVILLE  
**CAPITAL FUND PROGRAM**  
**CF 2025 Annual and Five-Year Plan**  
**PRESENTATION OF ANNUAL STATEMENT**

Date: January 8, 2025

Time: 5:00 pm

Name: ARNOLFO CARCIA

Title:

Address:

Development Name: VICTORIA

City: Brownsville, Texas 78521

Phone: 956-576-6679

Comments: PINTURA

I, the undersigned, hereby declare that I have been provided with information on the above CFP Annual Statement.

Arnolfo Garcia  
Signature

**HOUSING AUTHORITY OF THE CITY OF BROWNSVILLE**



**CAPITAL FUND PROGRAM**  
**CF 2025 Annual and Five-Year Plan**  
**PRESENTATION OF ANNUAL STATEMENT**

Date: January 8, 2025

Time: 5:00 pm

Name: Rosalinda Santos L.

Title:

Address: 2305 ROSEWELL

Development Name: TANGULO

City: Brownsville, Texas 78521

Phone: 956 312 9226

Comments:

EL AREA DE JUEGOS ESTA MUY  
DETERIORADA Y MUY POCOS JUEGOS

I, the undersigned, hereby declare that I have been provided with information on the above CFP Annual Statement.

Rosalinda Santos L.  
Signature



## HOUSING AUTHORITY OF THE CITY OF BROWNSVILLE



### CAPITAL FUND PROGRAM CF 2025 Annual and Five-Year Plan PRESENTATION OF ANNUAL STATEMENT

Date: January 8, 2025

Time: 5:00 pm.

Name:

Yaelin Hingosa

Title:

Address:

1819 Grant St.

Development Name:

City:

Brownsville, Texas 78521

Phone:

956-674-9549

Comments:

Baños Baños

I, the undersigned, hereby declare that I have been provided with information on the above CFP Annual Statement.

Signature

*Yaelin Hingosa*

## HOUSING AUTHORITY OF THE CITY OF BROWNSVILLE



### CAPITAL FUND PROGRAM CF 2025 Annual and Five-Year Plan PRESENTATION OF ANNUAL STATEMENT

Date: January 8, 2025

Time: 5:00 pm

Name:

Jose C. Rincon

Title:

Address:

1601 H #24

Development Name:

City:

Brownsville, Texas 78521

Phone:

956-293-1452

Comments:

Baños - PETANAS - Puertitas  
APAGADORES de LOS - Abanicos de estufa

I, the undersigned, hereby declare that I have been provided with information on the above CFP Annual Statement.

Signature

# HOUSING AUTHORITY OF THE CITY OF BROWNSVILLE



## CAPITAL FUND PROGRAM CF 2025 Annual and Five-Year Plan PRESENTATION OF ANNUAL STATEMENT

Date: January 8, 2025

Time: 5:00 pm

Name: Pablo Rodriguez

Title:

Address: Internacional Boulevard

Development Name:

City: Brownsville, Texas 78521

Phone: (956) 466-8668

Comments:

I, the undersigned, hereby declare that I have been provided with information on the above CFP Annual Statement.

Signature

Pablo Rodriguez

**Attachment: tx007b01**

**Housing Authority of the City of Brownsville  
Deconcentration Policy**

## **Policy of Deconcentrate Poverty and Promote Integration [24 CFR 903.1 and 903.2]**

### **Background**

Included in Quality Housing and Work Responsibility Act of 1998 (QHWRA or Housing Reform Act) is a requirement that public housing authorities submit, with their Agency Plans, an admissions policy designed to promote income-mixing within public housing complexes. The U.S. Department of Housing and Urban Development (HUD) established “income-mixing” rules and tools for evaluation of the current income-mix. The procedures are delineated, “Rule to Deconcentrate Poverty and Promote Integration in Public Housing; Final Rule”, published in the Federal Register as 24 CFR Part 903 and dated 22 December 2000.

The HACB’s admission policy includes the PHA’s policy designed to promote deconcentration of poverty and income-mixing by bringing higher income tenants into lower income developments and lower income tenants into higher income developments [24 CFR 903.7 (b)]. In addition the HACB’s deconcentration policy must comply with its obligation to meet the income targeting requirements [24 CFR 903.2 (c) (5)].

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

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

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

**Step 1.** The HACB must determine the average income of all families residing in all the HACB's covered developments. The HACB may use the median income, instead of average income, provided that the HACB includes a written explanation in its annual plan justifying the use of median income.

### **HACB Policy**

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

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

### **HACB Policy**

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

**Step 3.** The HACB must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income



determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low income family (30% of median income).

**Step 4.** If the HACB has covered developments that have average incomes outside the EIR, HACB must then determine whether or not these developments are consistent with its local goals and annual plan.

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

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

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

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

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

### **HACB Policy**

For developments outside the EIR the HACB will take actions in alignment with the deconcentration policy to provide for deconcentration of poverty and income mixing:

#### **Order of Selection [24 CFR 960.206(e)]**

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

### **HACB Policy**

Families will be selected from the waiting list based on preference. Among applicants with the same preference, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the HACB.

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



accessibility features.

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

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

**Attachment: tx007c01**

**Housing Authority of the City of Brownsville  
Violence Against Women Act (VAWA) Policy**

# **VAWA POLICY**



## **PART IX: VIOLENCE AGAINST WOMEN ACT (VAWA): NOTIFICATION, DOCUMENTATION, CONFIDENTIALITY**

### **16-IX.A. OVERVIEW**

The Violence against Women 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 the housing choice voucher (HCV) program. If your state or local laws provide greater protection for such victims, those laws apply in conjunction with VAWA.

In addition to definitions of key terms used in VAWA, this part contains general VAWA requirements and HACB policies in three areas: notification, documentation, and confidentiality. Specific VAWA requirements and HACB policies are located primarily in the following sections: 3-I.C, “Family Breakup and Remaining Member of Tenant Family”; 3-III.G, “Prohibition against Denial of Assistance to Victims of Domestic Violence, Dating Violence, and Stalking”; 10-I.A, “Allowable Moves”; 10-I.B, “Restrictions on Moves”; 12-II.E, “Terminations Related to Domestic Violence, Dating Violence, or Stalking”; and 12-II.F, “Termination Notice.”

### **16-IX.B. DEFINITIONS [24 CFR 5.2003, 42 USC 13925]**

As used in VAWA:

- The term *bifurcate* means, with respect to a public housing or Section 8 lease, to divide a lease as a matter of law such that certain tenants can be evicted or removed while the remaining family members’ lease and occupancy rights are allowed to remain intact.
- The term *dating violence* means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:
  - The length of the relationship
  - The type of relationship
  - The frequency of interaction between the persons involved in the relationship
- The term *domestic violence* includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction.



- The term *affiliated individual* means, with respect to a person:
  - A spouse, parent, brother or sister, or child of that individual, or an individual to whom that individual stands in the position or place of a parent; or
  - Any other individual, tenant, or lawful occupant living in the household of the victim of domestic violence, dating violence, sexual assault, or stalking.
- The term *sexual assault* means:
  - Any nonconsensual sexual act proscribed by federal, tribal, or state law, including when the victim lacks the capacity to consent
- The term *stalking* means:
  - To engage in a course of conduct directed at a specific person that would cause a reasonable person to fear for his or her safety or the safety of others, or suffer substantial emotional distress.

**16-IX.C. NOTIFICATION [24 CFR 5.2005(a)]**

**Notification to Public**

The HACB adopts the following policy to help ensure that all actual and potential beneficiaries of its HCV program are aware of their rights under VAWA.

HACB Policy

The HACB will post the following information regarding VAWA in its offices and on its Web site. It will also make the information readily available to anyone who requests it.

A copy of the notice of occupancy rights under VAWA to housing choice voucher program applicants and participants who are or have been victims of domestic violence, dating violence, sexual assault, or stalking (Form HUD-5380, see Exhibit 16-1)

A copy of form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and Alternate Documentation (see Exhibit 16-2)

A copy of the HACB's emergency transfer plan (Exhibit 16-3)

A copy of the HUD's Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, form HUD-5383 (Exhibit 16-4)

The National Domestic Violence Hot Line: 1-800-799-SAFE (7233) or 1-800-787-3224 (TTY) (included in Exhibits 16-1 and 16-2)

Contact information for local victim advocacy groups or service providers



**Notification to Program Applicants and Participants [24 CFR 5.2005(a)(1)]**

PHAs are required to inform program applicants and participants of their rights under VAWA, including their right to confidentiality and the limits thereof, when they are denied assistance, when they are admitted to the program, and when they are notified of an eviction or termination of housing benefits.

HACB Policy

The HACB will provide all applicants with information about VAWA at the time they request an application for housing assistance, as part of the written briefing packet, and at the time the family is admitted to the program. The HACB will also include information about VAWA in all notices of denial of assistance (see section 3-III.G).

The HACB will provide all participants with information about VAWA at the time of admission (see section 5-I.B) and at annual reexamination. The HACB will also include information about VAWA in notices of termination of assistance, as provided in section 12-II.F.

The VAWA information provided to applicants and participants will consist of the notice in Exhibit 16-1 and 16-2.

The HACB is not limited to providing VAWA information at the times specified in the above policy. If the HACB decides to provide VAWA information to a participant following an incident of domestic violence, Notice PIH 2017-08 cautions against sending the information by mail, since the abuser may be monitoring the mail. The notice recommends that in such cases the HACB make alternative delivery arrangements that will not put the victim at risk.

HACB Policy

Whenever the HACB has reason to suspect that providing information about VAWA to a participant might place a victim of domestic violence at risk, it will attempt to deliver the information by hand directly to the victim or by having the victim come to an office or other space that may be safer for the individual, making reasonable accommodations as necessary. For example, the HACB may decide not to send mail regarding VAWA protections to the victim's unit if the HACB believes the perpetrator may have access to the victim's mail, unless requested by the victim.

When discussing VAWA with the victim, the HACB will take reasonable precautions to ensure that no one can overhear the conversation, such as having conversations in a private room.

The victim may, but is not required to, designate an attorney, advocate, or other secure contact for communications regarding VAWA protections.



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**Notification to Owners and Managers**

While PHAs are no longer required by regulation to notify owners and managers participating in the HCV program of their rights and obligations under VAWA, the HACB may still choose to inform them.

HACB Policy

The HACB will provide owners and managers with information about their rights and obligations under VAWA when they begin their participation in the program and at least annually thereafter.

The VAWA information provided to owners will consist of the notice in Exhibit 16-2 and a copy of form HUD-5382, Certification of Domestic Violence, Dating Violence, and Stalking and Alternate Documentation.



**16-IX.D. DOCUMENTATION [24 CFR 5.2007]**

A PHA presented with a claim for initial or continued assistance based on status as a victim of domestic violence, dating violence, sexual assault, stalking, or criminal activity related to any of these forms of abuse may—but is not required to—request that the individual making the claim document the abuse. Any request for documentation must be in writing, and the individual must be allowed at least 14 business days after receipt of the request to submit the documentation. The HACB may extend this time period at its discretion. [24 CFR 5.2007(a)]

The individual may satisfy the HACB's request by providing any one of the following three forms of documentation [24 CFR 5.2007(b)]:

- (1) A completed and signed HUD-approved certification form (HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), which must include the name of the perpetrator only if the name of the perpetrator is safe to provide and is known to the victim. The form may be filled out and submitted on behalf of the victim.
- (2) A federal, state, tribal, territorial, or local police report or court record, or an administrative record
- (3) Documentation signed by a person who has assisted the victim in addressing domestic violence, dating violence, sexual assault or stalking, or the effects of such abuse. This person may be an employee, agent, or volunteer of a victim service provider; an attorney; a mental health professional; or a medical professional. The person signing the documentation must attest under penalty of perjury to the person's belief that the incidents in question are bona fide incidents of abuse. The victim must also sign the documentation.

The HACB may not require third-party documentation (forms 2 and 3) in addition to certification (form 1), except as specified below under "Conflicting Documentation," nor may it require certification in addition to third-party documentation [VAWA final rule].

**HACB Policy**

Any request for documentation of domestic violence, dating violence, sexual assault or stalking will be in writing, will specify a deadline of 14 business days following receipt of the request, will describe the three forms of acceptable documentation, will provide explicit instructions on where and to whom the documentation must be submitted, and will state the consequences for failure to submit the documentation or request an extension in writing by the deadline.

The HACB may, in its discretion, extend the deadline for 10 business days. In determining whether to extend the deadline, the HACB will consider factors that may contribute to the victim's inability to provide documentation in a timely manner, including cognitive limitations, disabilities, limited English proficiency, absence from the unit, administrative delays, the danger of further violence, and the victim's need to address health or safety issues. Any extension granted by the HACB will be in writing.

Once the victim provides documentation, the HACB will acknowledge receipt of the documentation within 10 business days.



**Conflicting Documentation [24 CFR 5.2007(e)]**

In cases where the HACB receives conflicting certification documents from two or more members of a household, each claiming to be a victim and naming one or more of the other petitioning household members as the perpetrator, the HACB may determine which is the true victim by requiring each to provide acceptable third-party documentation, as described above (forms 2 and 3). The HACB may also request third-party documentation when submitted documentation contains information that conflicts with existing information already available to the HACB. Individuals have 30 calendar days to return third-party verification to the HACB. If the HACB does not receive third-party documentation, and the PHA will deny or terminate assistance as a result, the HACB must hold separate hearings for the tenants [Notice PIH 2017-08].

The HACB must honor any court orders issued to protect the victim or to address the distribution of property.

**HACB Policy**

If presented with conflicting certification documents from members of the same household, the HACB will attempt to determine which is the true victim by requiring each of them to provide third-party documentation in accordance with 24 CFR 5.2007(e) and by following any HUD guidance on how such determinations should be made.

When requesting third-party documents, the HACB will provide contact information for local domestic violence and legal aid offices. In such cases, applicants or tenants will be given 30 calendar days from the date of the request to provide such documentation.

If the HACB does not receive third-party documentation within the required timeframe (and any extensions) the HACB will deny VAWA protections and will notify the applicant or tenant in writing of the denial. If, as a result, the applicant or tenant is denied or terminated from the program, the HACB will hold separate hearings for the applicants or tenants.

**Discretion to Require No Formal Documentation [24 CFR 5.2007(d)]**

The HACB has the discretion to provide benefits to an individual based solely on the individual's statement or other corroborating evidence—i.e., without requiring formal documentation of abuse in accordance with 24 CFR 5.2007(b). HUD recommends documentation in a confidential manner when a verbal statement or other evidence is accepted.

**HACB Policy**

If the HACB accepts an individual's statement or other corroborating evidence (as determined by the victim) of domestic violence, dating violence, sexual assault or stalking, the HACB will document acceptance of the statement or evidence in the individual's file.



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**Failure to Provide Documentation [24 CFR 5.2007(c)]**

In order to deny relief for protection under VAWA, a HACB must provide the individual requesting relief with a written request for documentation of abuse. If the individual fails to provide the documentation within 14 business days from the date of receipt, or such longer time as the HACB may allow, the HACB may deny relief for protection under VAWA.

**16-IX.E. CONFIDENTIALITY [24 CFR 5.2007(b)(4)]**

All information provided to the PHA regarding domestic violence, dating violence, sexual assault or stalking, including the fact that an individual is a victim of such violence or stalking, must be retained in confidence. This means that the HACB (1) may not enter the information into any shared database, (2) may not allow employees or others to access the information unless they are explicitly authorized to do so and have a need to know the information for purposes of their work, and (3) may not provide the information to any other entity or individual, except to the extent that the disclosure is (a) requested or consented to by the individual in writing, (b) required for use in an eviction proceeding, or (c) otherwise required by applicable law.

HACB Policy

If disclosure is required for use in an eviction proceeding or is otherwise required by applicable law, the HACB will inform the victim before disclosure occurs so that safety risks can be identified and addressed.



**EXHIBIT 16-1: NOTICE OF OCCUPANCY RIGHTS UNDER THE VIOLENCE AGAINST WOMEN ACT, FORM HUD-5380**

**Housing Authority of the City of Brownsville<sup>1</sup>**

***Notice of Occupancy Rights under the Violence Against Women Act<sup>2</sup>***

**To all Tenants and Applicants**

The Violence Against Women Act (VAWA) provides protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are not only available to women, but are available equally to all individuals regardless of sex, gender identity, or sexual orientation.<sup>1</sup> The U.S. Department of Housing and Urban Development (HUD) is the Federal agency that oversees that the Housing Choice Voucher Program is in compliance with VAWA. This notice explains your rights under VAWA. A HUD-approved certification form is attached to this notice. You can fill out this form to show that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking, and that you wish to use your rights under VAWA.”

**Protections for Applicants**

If you otherwise qualify for assistance under the housing choice voucher program, you cannot be denied admission or denied assistance because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

**Protection for Tenants**

If you are receiving assistance under housing choice voucher program, you may not be denied assistance, terminated from participation, or be evicted from your rental housing because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

Also, if you or an affiliated individual of yours is or has been the victim of domestic violence, dating violence, sexual assault, or stalking by a member of your household or any guest, you may not be denied rental assistance or occupancy rights under the housing choice voucher program solely on the basis of criminal activity directly relating to that domestic violence, dating violence, sexual assault, or stalking.

Affiliated individual means your spouse, parent, brother, sister, or child, or a person to whom you stand in the place of a parent or guardian (for example, the affiliated individual is in your care, custody, or control); or any individual, tenant, or lawful occupant living in your household.

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<sup>2</sup> Despite the name of this law, VAWA protection is available regardless of sex, gender identity, or sexual orientation.

<sup>3</sup> Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.



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**Removing the Abuser or Perpetrator from the Household**

The HACB may divide (bifurcate) your lease in order to evict the individual or terminate the assistance of the individual who has engaged in criminal activity (the abuser or perpetrator) directly relating to domestic violence, dating violence, sexual assault, or stalking.

If the HACB landlord chooses to remove the abuser or perpetrator, the HACB may not take away the rights of eligible tenants to the unit or otherwise punish the remaining tenants. If the evicted abuser or perpetrator was the sole tenant to have established eligibility for assistance under the program, the HACB must allow the tenant who is or has been a victim and other household members to remain in the unit for a period of time, in order to establish eligibility under the program or under another HUD housing program covered by VAWA, or, find alternative housing.

In removing the abuser or perpetrator from the household, the HACB must follow Federal, State, and local eviction procedures. In order to divide a lease, the HACB may, but is not required to, ask you for documentation or certification of the incidences of domestic violence, dating violence, sexual assault, or stalking.

**Moving to Another Unit**

Upon your request, the HACB may permit you to move to another unit, subject to the availability of other units, and still keep your assistance. In order to approve a request, the HACB may ask you to provide documentation that you are requesting to move because of an incidence of domestic violence, dating violence, sexual assault, or stalking. If the request is a request for emergency transfer, the housing provider may ask you to submit a written request or fill out a form where you certify that you meet the criteria for an emergency transfer under VAWA. The criteria are:

- 1. You are a victim of domestic violence, dating violence, sexual assault, or stalking.** If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation, as described in the documentation section below.
- 2. You expressly request the emergency transfer.** Your housing provider may choose to require that you submit a form, or may accept another written or oral request.
- 3. You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit.** This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

**OR**

**You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer.** If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you expressly request the transfer.



The HACB will keep confidential requests for emergency transfers by victims of domestic violence, dating violence, sexual assault, or stalking, and the location of any move by such victims and their families.

The HACB's emergency transfer plan provides further information on emergency transfers, and HACB must make a copy of its emergency transfer plan available to you if you ask to see it.

### **Documenting You Are or Have Been a Victim of Domestic Violence, Dating Violence, Sexual Assault or Stalking**

The HACB can, but is not required to, ask you to provide documentation to "certify" that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking. Such request from the HACB must be in writing, and the HACB must give you at least 14 business days (Saturdays, Sundays, and Federal holidays do not count) from the day you receive the request to provide the documentation. The HACB may, but does not have to, extend the deadline for the submission of documentation upon your request.

You can provide one of the following to the HACB as documentation. It is your choice which of the following to submit if the HACB asks you to provide documentation that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

- A complete HUD-approved certification form given to you by the HACB with this notice, that documents an incident of domestic violence, dating violence, sexual assault, or stalking. The form will ask for your name, the date, time, and location of the incident of domestic violence, dating violence, sexual assault, or stalking, and a description of the incident. The certification form provides for including the name of the abuser or perpetrator if the name of the abuser or perpetrator is known and is safe to provide.
- A record of a Federal, State, tribal, territorial, or local law enforcement agency, court, or administrative agency that documents the incident of domestic violence, dating violence, sexual assault, or stalking. Examples of such records include police reports, protective orders, and restraining orders, among others.
- A statement, which you must sign, along with the signature of an employee, agent, or volunteer of a victim service provider, an attorney, a medical professional or a mental health professional (collectively, "professional") from whom you sought assistance in addressing domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse, and with the professional selected by you attesting under penalty of perjury that he or she believes that the incident or incidents of domestic violence, dating violence, sexual assault, or stalking are grounds for protection.
- Any other statement or evidence that the HACB has agreed to accept.

If you fail or refuse to provide one of these documents within the 14 business days, HACB does not have to provide you with the protections contained in this notice.

If HACB receives conflicting evidence that an incident of domestic violence, dating violence, sexual assault, or stalking has been committed (such as certification forms from two or more members of a household each claiming to be a victim and naming one or more of the other petitioning household members as the abuser or perpetrator), the HACB has the right to request that you provide third-party documentation within thirty 30 calendar days in order to resolve the conflict. If you fail or refuse to provide third-party documentation where there is conflicting evidence, the HACB does not have to provide you with the protections contained in this notice.

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### **Confidentiality**

The HACB must keep confidential any information you provide related to the exercise of your rights under VAWA, including the fact that you are exercising your rights under VAWA.

The HACB must not allow any individual administering assistance or other services on behalf of the HACB (for example, employees and contractors) to have access to confidential information unless for reasons that specifically call for these individuals to have access to this information under applicable Federal, State, or local law.

The HACB must not enter your information into any shared database or disclose your information to any other entity or individual. The HACB, however, may disclose the information provided if:

- You give written permission to the HACB to release the information on a time limited basis.
- The HACB needs to use the information in an eviction or termination proceeding, such as to evict your abuser or perpetrator or terminate your abuser or perpetrator from assistance under this program.
- A law requires the HACB or your landlord to release the information.

VAWA does not limit the HACB's duty to honor court orders about access to or control of the property. This includes orders issued to protect a victim and orders dividing property among household members in cases where a family breaks up.

### **Reasons a Tenant Eligible for Occupancy Rights under VAWA May Be Evicted or Assistance May Be Terminated**

You can be evicted and your assistance can be terminated for serious or repeated lease violations that are not related to domestic violence, dating violence, sexual assault, or stalking committed against you. However, HACB cannot hold tenants who have been victims of domestic violence, dating violence, sexual assault, or stalking to a more demanding set of rules than it applies to tenants who have not been victims of domestic violence, dating violence, sexual assault, or stalking.

The protections described in this notice might not apply, and you could be evicted and your assistance terminated, if the HACB can demonstrate that not evicting you or terminating your assistance would present a real physical danger that:

1. Would occur within an immediate time frame, and
2. Could result in death or serious bodily harm to other tenants or those who work on the property.

If the HACB can demonstrate the above, the HACB should only terminate your assistance or evict you if there are no other actions that could be taken to reduce or eliminate the threat.

### **Other Laws**

VAWA does not replace any Federal, State, or local law that provides greater protection for victims of domestic violence, dating violence, sexual assault, or stalking. You may be entitled to additional housing protections for victims of domestic violence, dating violence, sexual assault, or stalking under other Federal laws, as well as under State and local laws.



**Non-Compliance with The Requirements of This Notice**

You may report a covered housing provider's violations of these rights and seek additional assistance, if needed, by contacting or filing a complaint with the San Antonio HUD Field Office located at Hipolito Garcia Federal Building, 615 East Houston Street, Suite 347, San Antonio, TX 78205-2001, Phone:210-475-6806, TTY: 800-877-8339.

**For Additional Information**

You may view a copy of HUD's final VAWA rule at <https://www.federalregister.gov/d/2016-25888>.

Additionally, the HACB must make a copy of HUD's VAWA regulations available to you if you ask to see them.

For questions regarding VAWA, please contact HACB Client Service Director, Leticia Gonzalez at (956) 214-1520 or by email: [lgonzalez@hacb.us](mailto:lgonzalez@hacb.us).

For help regarding an abusive relationship, you may call the National Domestic Violence Hotline at 1-800-799-7233 or, for persons with hearing impairments, 1-800-787-3224 (TTY). You may also contact Friendship of Women LLC through the 24-Hour Crisis Line: 956-544-7412.

For tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

For help regarding sexual assault, you may contact Rape Abuse and Incest National Network (RAINN) through the National Sexual Assault Hotline: 1-800-656-HOPE-(4673).

Victims of stalking seeking help may contact the National Center for Victims of Crime at 1-855-4-VICTIM (84-2846).

**Attachment:** Certification form HUD-5382



**EXHIBIT 16-2: CERTIFICATION OF DOMESTIC VIOLENCE, DATING VIOLENCE,  
SEXUAL ASSAULT, OR STALKING AND ALTERNATE DOCUMENTATION,  
FORM-5382**

**CERTIFICATION OF  
DOMESTIC VIOLENCE,  
DATING VIOLENCE,  
SEXUAL ASSAULT, OR STALKING,  
AND ALTERNATE DOCUMENTATION**

**U.S. Department of Housing  
and Urban Development**

OMB Approval No. 2577-0286  
Exp. 06/30/2017

**Purpose of Form:** The Violence Against Women Act (“VAWA”) protects applicants, tenants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

**Use of This Optional Form:** If you are seeking VAWA protections from your housing provider, your housing provider may give you a written request that asks you to submit documentation about the incident or incidents of domestic violence, dating violence, sexual assault, or stalking.

In response to this request, you or someone on your behalf may complete this optional form and submit it to your housing provider, or you may submit one of the following types of third-party documentation:

- (1) A document signed by you and an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively, “professional”) from whom you have sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse. The document must specify, under penalty of perjury, that the professional believes the incident or incidents of domestic violence, dating violence, sexual assault, or stalking occurred and meet the definition of “domestic violence,” “dating violence,” “sexual assault,” or “stalking” in HUD’s regulations at 24 CFR 5.2003.
- (2) A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or
- (3) At the discretion of the housing provider, a statement or other evidence provided by the applicant or tenant.

**Submission of Documentation:** The time period to submit documentation is 14 business days from the date that you receive a written request from your housing provider asking that you provide documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking. Your housing provider may, but is not required to, extend the time period to submit the documentation, if you request an extension of the time period. If the requested information is not received within 14 business days of when you received the request for the documentation, or any extension of the date provided by your housing provider, your housing provider does not need to grant you any of the VAWA protections. Distribution or issuance of this form does not serve as a written request for certification.

**Confidentiality:** All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking shall be kept confidential and such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections to you, and such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to



by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

**TO BE COMPLETED BY OR ON BEHALF OF THE VICTIM OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING**

1. Date the written request is received by victim: \_\_\_\_\_

2. Name of victim: \_\_\_\_\_

3. Your name (if different from victim's): \_\_\_\_\_

4. Name(s) of other family member(s) listed on the lease: \_\_\_\_\_

5. Residence of victim: \_\_\_\_\_

6. Name of the accused perpetrator (if known and can be safely disclosed): \_\_\_\_\_

7. Relationship of the accused perpetrator to the victim: \_\_\_\_\_

8. Date(s) and times(s) of incident(s) (if known): \_\_\_\_\_

10. Location of incident(s): \_\_\_\_\_

In your own words, briefly describe the incident(s):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

This is to certify that the information provided on this form is true and correct to the best of my knowledge and recollection, and that the individual named above in Item 2 is or has been a victim of domestic violence, dating violence, sexual assault, or stalking. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature \_\_\_\_\_ Signed on (Date) \_\_\_\_\_

**Public Reporting Burden:** The public reporting burden for this collection of information is estimated to average 1 hour per response. This includes the time for collecting, reviewing, and reporting the data. The information provided is to be used by the housing provider to request certification that the applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking. The information is subject to the confidentiality requirements of VAWA. This agency may not collect this information, and



you are not required to complete this form, unless it displays a currently valid Office of Management and Budget control number.

**EXHIBIT 16-3: EMERGENCY TRANSFER PLAN FOR VICTIMS OF  
DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR  
STALKING (HCV VERSION)**

**Attachment: Certification form HUD-5382**

**Housing Authority of the City of Brownsville**

**Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual  
Assault, or Stalking**

**Housing Choice Voucher Program**

**Emergency Transfers**

The HACB is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),<sup>2</sup> HP allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.<sup>3</sup> The ability of HACB to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether HACB has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the federal agency that oversees that the public and housing choice voucher (HCV) programs are in compliance with VAWA.

**Eligibility for Emergency Transfers**

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the tenant reasonably believes that there is a threat of imminent harm from further violence if

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<sup>4</sup> Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

<sup>5</sup> Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.



the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

### **Emergency Transfer Request Documentation**

To request an emergency transfer, the tenant shall notify HACB's management office and submit a written request for a transfer to any HACB office. HACB will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under HACB's program; OR
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

### **Confidentiality**

The HACB will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives HACB written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence Against Women Act For All Tenants for more information about HACB's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

### **Emergency Transfer Timing and Availability**

The HACB cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. The HACB will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. HACB may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If HACB has no safe and available units for which a tenant who needs an emergency is eligible, HACB will assist the tenant in identifying other housing providers who may have safe and



available units to which the tenant could move. At the tenant's request, HACB will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

**Emergency Transfers: Housing Choice (HCV) Program**

**Tenant-based assistance:** If you are a participant in the tenant-based based HCV program and request an emergency transfer as described in this plan, the HACB will assist you to move to a safe unit quickly using your existing voucher assistance. The HACB will make exceptions to program regulations restricting moves as required.

At your request, the HACB will refer you to organizations that may be able to further assist you.

**Project-based assistance:** If you are assisted under the project-based voucher (PBV) program, you may request an emergency transfer under the following programs for which you are not required to apply:

- Tenant-based voucher, if applicable
- Project-based assistance in the same project (if a vacant unit is available and you determine that the vacant unit is safe)
- Project-based assistance in another development owned by the HACB

Emergency transfers under VAWA will take priority over waiting list admissions for these types of assistance.

You may also request an emergency transfer under the following programs for which you are required to apply:

- Public housing program
- PBV assistance in another development not owned by the HACB
- PBV Rental Assistance Demonstration
- LIHTC or HOME

Emergency transfers will not take priority over waiting list admissions for these programs. At your request, the HACB will refer you to organizations that may be able to further assist you.

**Safety and Security of Tenants**

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.



Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

**Attachment:** Local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking.



**EXHIBIT 16-4: EMERGENCY TRANSFER REQUEST FOR CERTAIN  
VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL  
ASSAULT, OR STALKING FORM-HUD-5383****EMERGENCY TRANSFER  
REQUEST FOR CERTAIN  
VICTIMS OF DOMESTIC  
VIOLENCE, DATING VIOLENCE,  
SEXUAL ASSAULT, OR STALKING****U.S. Department of Housing  
and Urban Development**OMB Approval No. 2577-0286  
Exp. 06/30/2017

**Purpose of Form:** If you are a victim of domestic violence, dating violence, sexual assault, or stalking, and you are seeking an emergency transfer, you may use this form to request an emergency transfer and certify that you meet the requirements of eligibility for an emergency transfer under the Violence Against Women Act (VAWA). Although the statutory name references women, VAWA rights and protections apply to all victims of domestic violence, dating violence, sexual assault or stalking. Using this form does not necessarily mean that you will receive an emergency transfer. See your housing provider's emergency transfer plan for more information about the availability of emergency transfers.

**The requirements you must meet are:****(1) You are a victim of domestic violence, dating violence, sexual assault, or stalking.**

If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation. In response, you may submit Form HUD-5382, or any one of the other types of documentation listed on that Form.

**(2) You expressly request the emergency transfer.** Submission of this form confirms that you have expressly requested a transfer. Your housing provider may choose to require that you submit this form, or may accept another written or oral request. Please see your housing provider's emergency transfer plan for more details.

**(3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit.** This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

**OR**

**You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer.** If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you submit this form or otherwise expressly request the transfer.

**Submission of Documentation:** If you have third-party documentation that demonstrates why you are eligible for an emergency transfer, you should submit that documentation to your housing provider if it is safe for you to do so. Examples of third party documentation include, but are not limited to: a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom you have sought assistance; a current restraining order; a recent court order or other court records; a law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts.



**Confidentiality:** All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking, and concerning your request for an emergency transfer shall be kept confidential. Such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections or an emergency transfer to you. Such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

**TO BE COMPLETED BY OR ON BEHALF OF THE PERSON REQUESTING A TRANSFER**

1. Name of victim requesting an emergency transfer: \_\_\_\_\_

2. Your name (if different from victim's) \_\_\_\_\_

3. Name(s) of other family member(s) listed on the lease: \_\_\_\_\_

4. Name(s) of other family member(s) who would transfer with the victim: \_\_\_\_\_

5. Address of location from which the victim seeks to transfer: \_\_\_\_\_

6. Address or phone number for contacting the victim: \_\_\_\_\_

7. Name of the accused perpetrator (if known and can be safely disclosed): \_\_\_\_\_

8. Relationship of the accused perpetrator to the victim: \_\_\_\_\_

9. Date(s), Time(s) and location(s) of incident(s): \_\_\_\_\_

10. Is the person requesting the transfer a victim of a sexual assault that occurred in the past 90 days on the premises of the property from which the victim is seeking a transfer? If yes, skip question 11. If no, fill out question 11. \_\_\_\_\_

11. Describe why the victim believes they are threatened with imminent harm from further violence if they remain in their current unit.

12. If voluntarily provided, list any third-party documentation you are providing along with this notice: \_\_\_\_\_



This is to certify that the information provided on this form is true and correct to the best of my knowledge, and that the individual named above in Item 1 meets the requirement laid out on this form for an emergency transfer. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature \_\_\_\_\_ Signed on (Date) \_\_\_\_\_

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**MODEL OWNER NOTIFICATION OF RIGHTS AND OBLIGATIONS**

**HOUSING AUTHORITY OF THE CITY OF BROWNSVILLE**

**NOTIFICATION OF YOUR RIGHTS AND OBLIGATIONS**

**UNDER THE VIOLENCE AGAINST WOMEN ACT (VAWA)**

VAWA provides protections for Section 8 Housing Choice Voucher (HCV) and PBV applicants, tenants, and participants from being denied assistance on the basis or as a direct result of being a victim of domestic violence, dating violence, sexual assault and stalking.

**Purpose**

Many of VAWA's protections to victims of domestic violence, dating violence, sexual assault and stalking involve action by the public housing agency (PHA), but some situations involve action by owners of assisted housing. The purpose of this notice (herein called "Notice") is to explain your rights and obligations under VAWA, as an owner of housing assisted through [insert name of housing provider] HCV program. Each component of this Notice also provides citations to HUD's applicable regulations.



**Denial of Tenancy**

Protections for applicants: Owners cannot deny tenancy based on the applicant having been or currently being a victim of domestic violence, dating violence, sexual assault, or stalking. However, the applicant must be otherwise eligible for tenancy. (See 24 Code of Federal Regulations (CFR) 982.452(b)(1).)

**Eviction**

*Protections for HCV participants:* Incidents or threats of domestic violence, dating violence, sexual assault, or stalking will not be considered a serious or repeated lease violation by the victim, or good cause to terminate the tenancy of the victim (24 CFR 5.2005(c)). Protection also applies to criminal activity related directly to domestic violence, dating violence, sexual assault, or stalking, conducted by a member of a tenant's household or any guest or other person under the tenant's control, if the tenant or an affiliated individual of the tenant is the victim or threatened victim of such domestic violence, dating violence, sexual assault, or stalking (24 CFR 5.2005(b)(2)).

*Limitations of VAWA protections:*

- a. Nothing in the VAWA Final Rule limits the authority of an owner, when notified of a court order, to comply with a court order with respect to (24 CFR 5.2005(d)(1)):
  - 1) The rights of access or control of property, including civil protection orders issued to protect a victim of domestic violence, dating violence, sexual assault, or stalking; or
  - 2) The distribution or possession of property among members of a household in a case.
- b. Nothing in the VAWA Final Rule limits an owner from evicting a victim of domestic violence, dating violence, sexual assault, or stalking for a lease violation that is not premised on an act of domestic violence, dating violence, sexual assault, or stalking, as long as the owner does not subject the victim to more demanding standards than other tenants when deciding whether to evict. (See 24 CFR 5.2005(d)(2).)
- c. Nothing in the VAWA Final Rule limits an owner from evicting a tenant (including the victim of domestic violence, dating violence, sexual assault, or stalking) if the owner can demonstrate an actual and imminent threat to other tenants or those employed at or providing services to the HCV property would be present if the tenant or lawful occupant is not evicted. (See 24 CFR 5.2005(d)(3).)



i. In this context, words, gestures, actions, or other indicators will be considered an “actual and imminent threat” if they meet the following standards: An actual and imminent threat consists of a physical danger that is real, would occur within an immediate time frame, and could result in death or serious bodily harm. In determining whether an individual would pose an actual and imminent threat, the factors to be considered include: the duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the length of time before the potential harm would occur. (See 24 CFR 5.2003.)

ii. Any eviction due to “actual and imminent threat” should be utilized by an owner only when there are no other actions that could be taken to reduce or eliminate the threat, including, but not limited to, transferring the victim to a different unit, barring the perpetrator from the property, contacting law enforcement to increase police presence or develop other plans to keep the property safe, or seeking other legal remedies to prevent the perpetrator from acting on a threat. Restrictions predicated on public safety cannot be based on stereotypes, but must be tailored to particularized concerns about individual residents. (See 24 CFR 5.2005(d)(4).)

#### **Documentation of Domestic Violence, Dating Violence, Sexual Assault, or Stalking**

If an applicant or tenant requests VAWA protection based on status as a victim of domestic violence, dating violence, sexual assault, or stalking, the owner has the option to request that the victim document or provide written evidence to demonstrate that the violence occurred. However, nothing in HUD’s regulation requires a covered housing provider to request this documentation. (See 24 CFR 5.2007(b)(3).)

If the owner chooses to request this documentation, the owner must make such request in writing. The individual may satisfy this request by providing any one document type listed under 24 CFR 5.2007(b)(1):

- a. Form HUD-55383 (Self-Certification Form); or
- b. A document: 1) Signed by an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional or a mental health professional (collectively, “professional”) from whom the victim has sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse; 2) Signed by the applicant or tenant; and 3) That specifies, under penalty of perjury, that the professional believes in the occurrence of the incident of domestic violence, dating violence, sexual assault, or stalking that is the ground for protection and remedies under 24 CFR part 5, subpart L, and that the incident meets the applicable definition of domestic violence, dating violence, sexual assault, or stalking under 24 CFR 5.2003; or
- c. A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or
- d. At the discretion of a covered housing provider, a statement or other evidence provided by the applicant or tenant.

The owner must accept any of the above items (a – c). The owner has discretion to accept a statement or other evidence (d).

The owner is prohibited from requiring third-party documentation of the domestic violence, dating violence, sexual assault, or stalking, unless the submitted documentation contains conflicting information.



If the owner makes a written request for documentation, the owner may require submission of that documentation within 14 business days after the date that the individual received the written request for documentation. (24 CFR 5.2007(a)(2)). The owner may extend this time period at its discretion. During the 14 business day period and any granted extensions of that time, no adverse actions, such as evictions or terminations, can be taken against the individual requesting VAWA protection.

Once a victim provides documentation of domestic violence, dating violence, sexual assault, or stalking, the owner is encouraged to acknowledge receipt of the documentation in a timely manner.

If the applicant or tenant fails to provide documentation that meets the criteria in 24 CFR 5.2007 within 14 business days after receiving the written request for that documentation or within the designated extension period, nothing in VAWA Final Rule may be construed to limit the authority of the covered housing provider to:

- a. Deny admission by the applicant or tenant to the housing or program;
- b. Deny assistance under the covered housing program to the applicant or tenant;
- c. Terminate the participation of the tenant in the covered housing program; or
- d. Evict the tenant, or a lawful occupant that commits a violation of a lease.

An individual's failure to timely provide documentation of domestic violence, dating violence, sexual assault, or stalking does not result in a waiver of the individual's right to challenge the denial of assistance or termination, nor does it preclude the individual's ability to raise an incident of domestic violence, dating violence, sexual assault, or stalking at eviction or termination proceedings.

### **Moves**

A victim of domestic violence, dating violence, sexual assault, or stalking may move in violation of their lease if the move is required to protect their safety. If a move results in the termination of the Housing Assistance Payment Contract, the lease is automatically terminated.

### **Lease Bifurcation**

Owners may choose to bifurcate a lease, or remove a household member from a lease in order to evict, remove, the covered housing program or find alternative housing following lease bifurcation provision in 24 CFR 5.2009(b). VAWA protections, including bifurcation, do not apply to guests or unreported members of a household or anyone else residing in a household who is not a tenant.

Eviction, removal, termination of occupancy rights, or termination of assistance must be effected in accordance with the procedures prescribed by federal, state, or local law for termination of leases.

To avoid unnecessary delay in the bifurcation process, HUD recommends that owners seek court-ordered eviction of the perpetrator pursuant to applicable laws. This process results in the underlying lease becoming null and void once the owner regains possession of the unit. The owner would then execute a new lease with the victim.



**Evictions Due to “Actual and Imminent Threat” or Violations Not Premised on Abuse**

The VAWA Final Rule generally prohibits eviction on the basis or as a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the applicant or tenant otherwise qualifies for assistance, participation or occupancy. (See 24 CFR 5.2005.)

However, the VAWA Final Rule does not prohibit an owner from evicting a tenant for any violation not premised on an act of domestic violence, dating violence, sexual assault, or stalking that is in question against the tenant or an affiliated individual of the tenant. Nor does the VAWA Final Rule prohibit an owner from evicting a tenant if the owner can demonstrate an actual and imminent threat to other tenants or those employed at or providing services to property of the owner would be present if that tenant or lawful occupant is not evicted or terminated from assistance. (See 5.2005(d)(2) and (3).)

In order to demonstrate an actual and imminent threat to other tenants or employees at the property, the covered housing provider must have objective evidence of words, gestures, actions, or other indicators that meet the standards in the following definition:

Actual and imminent threat refers to a physical danger that is real, would occur within an immediate time frame, and could result in death or serious bodily harm. In determining whether an individual would pose an actual and imminent threat, the factors to be considered include:

- The duration of the risk;
- The nature and severity of the potential harm;
- The likelihood that the potential harm will occur; and
- The length of time before the potential harm would occur.

(See 24 CFR 5.2003 and 5.2005(d)(2).)

**Confidentiality**

Any information submitted to a covered housing provider under 24 CFR 5.2007, including the fact that an individual is a victim of domestic violence, dating violence, sexual assault, or stalking, must be maintained in strict confidence by the covered housing provider. (See 24 CFR 5.2007(c).)

Employees of the owner (or those within their employ, e.g., contractors) must not have access to the information unless explicitly authorized by the owner for reasons that specifically call for these individuals to have access to this information under applicable Federal, State, or local law (e.g., the information is needed by an employee to provide the VAWA protections to the victim).

The owner must not enter this information into any shared database, or disclose this information to any other entity or individual, except to the extent that disclosure is:

- a. Requested or consented to in writing by the individual (victim) in a time-limited release;
- b. Required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program; or
- c. Otherwise required by applicable law.

When communicating with the victim, owners must take precautions to ensure compliance with these confidentiality requirements.



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**Service Providers**

[insert name of housing provider] has extensive relationships with local service providers. [insert name of housing provider] staff are available to provide referrals to shelters, counselors, and advocates. These resources are also provided in [insert name of housing provider] Annual and 5-Year Plan, Administrative Plan, VAWA Notice of Occupancy Rights, and Emergency Transfer Plan. A list of local service providers is attached to this Notice.

**Definitions**

Actual and imminent threat refers to a physical danger that is real, would occur within an immediate time frame, and could result in death or serious bodily harm. In determining whether an individual would pose an actual and imminent threat, the factors to be considered include: the duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the length of time before the potential harm would occur.

**Affiliated individual, with respect to an individual, means:**

- (1) A spouse, parent, brother, sister, or child of that individual, or a person to whom that individual stands in the place of a parent or guardian (for example, the affiliated individual is a person in the care, custody, or control of that individual); or
- (2) Any individual, tenant, or lawful occupant living in the household of that individual.

**Bifurcate** means to divide a lease as a matter of law, subject to the permissibility of such process under the requirements of the applicable HUD-covered program and State or local law, such that certain tenants or lawful occupants can be evicted or removed and the remaining tenants or lawful occupants can continue to reside in the unit under the same lease requirements or as may be revised depending upon the eligibility for continued occupancy of the remaining tenants and lawful occupants.

**Dating violence** means violence committed by a person:

- (1) Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- (2) Where the existence of such a relationship shall be determined based on a consideration of the following factors:
  - (i) The length of the relationship;
  - (ii) The type of relationship; and
  - (iii) The frequency of interaction between the persons involved in the relationship.

**Domestic violence** includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction. The term "spouse or intimate partner of the victim" includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship.



**Sexual assault** means any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks capacity to consent.

**Stalking** means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- (1) Fear for the person's individual safety or the safety of others; or
- (2) Suffer substantial emotional distress.

**VAWA** means the Violence Against Women Act of 1994, as amended (42 U.S.C. 13925 and 42 U.S.C. 14043e et seq.).

**Attached:**

Legal services and the domestic violence resources for the Metro area

Form HUD-5382 Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

[insert name of housing provider] VAWA Notice of Occupancy Rights



**Attachment: tx007d01**

**Housing Authority of the City of Brownsville**

**Strategic Plan**





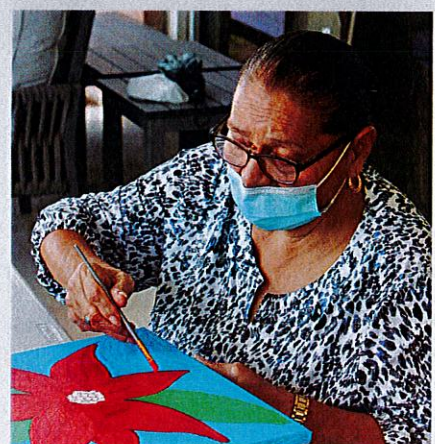
# STRATEGIC PLAN

## 2022 - 2027

HOUSING AUTHORITY OF THE CITY OF BROWNSVILLE  
2606 BOCA CHICA BLVD | BROWNSVILLE, TX 78521







*HACB's Club de Oro gathered for the first time since the pandemic at Poinsettia Gardens at Boca Chica (PGBC) in June 2021. Members of the Club de Oro enjoyed breakfast tacos, painted a poinsettia, and cherished each other's company. The event was organized by HACB Resident Commissioner and PGBC Resident Association President, Laura Villarreal. Chief Executive Officer Carla Mancha, Director of Supportive Services Ana Trejo, former Director of Supportive Services Hilda Ledezma, and ROSS Coordinator Rosemary Rodriguez also attended.*



## INTRODUCTION | HOUSING AUTHORITY OF THE CITY OF BROWNSVILLE

The Housing Authority of the City of Brownsville (HACB) has provided affordable housing for low to moderate income families and individuals since its founding in 1938. Today, the HACB and its affiliates serve 3,820 families across the City of Brownsville through the public housing, Housing Tax Credit, Rental Assistance Demonstration Program, and Housing Choice Voucher programs.



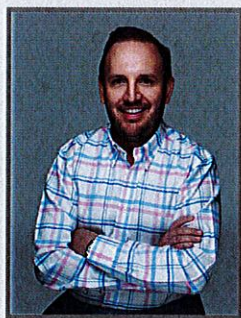
*The Brownsville Housing Opportunity Corporation Board of Directors on the El Jardin roof top. El Jardin was awarded 9% LIHTC in July 2021 and will be restored and used for affordable housing. From left to right, Employee Director Miguel Herrera, Commissioner Director Ruben Herrera, Employee Director/CEO Carla Mancha, President Luis Eduardo Garduño and Vice President Jesse Miller.*





### BOARD OF COMMISSIONERS

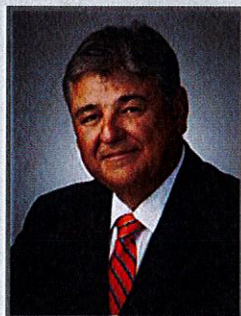
The HACB Board of Commissioners consists of five members. One member must be a resident of the Public Housing Program or Housing Choice Voucher Program participant. Board Members are appointed by the Mayor of the City of Brownsville. HACB's Board of Commissioners played an integral role in updating HACB's mission, vision, and goals for this Strategic Plan. Through their leadership and passion, HACB's Board of Commissioners have provided the direction necessary to guide HACB to success.



**Luis Eduardo Garduño**  
*Board Chairman*



**Mr. Jesse Miller**  
*Board Vice-Chairman*



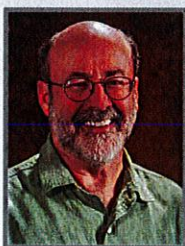
**Mr. Ruben Herrera**  
*Board Member*



**Ms. Wendy DeLeon**  
*Board Member*



**Laura Villarreal**  
*Resident Commissioner*



#### **Thank you Commissioner Seifert!**

The HACB team would like to thank Commissioner Michael Seifert for his contributions to the success of HACB through his service as a member of the Board of Commissioners and his contribution towards the development of our 2022 -2027 Strategic Plan.



### HACB STRATEGIC PLANNING COMMITTEE

This Strategic Plan could not have been created without the hard work and dedication of the members of the HACB Strategic Planning Committee. Through all phases of the development of this plan, from the Current State Assessment to Vision Setting and Action Planning, the Committee members provided thoughtful contributions and feedback, resulting in the identification of strategic objectives and an actionable and realistic plan that will guide the agency through its next five years.



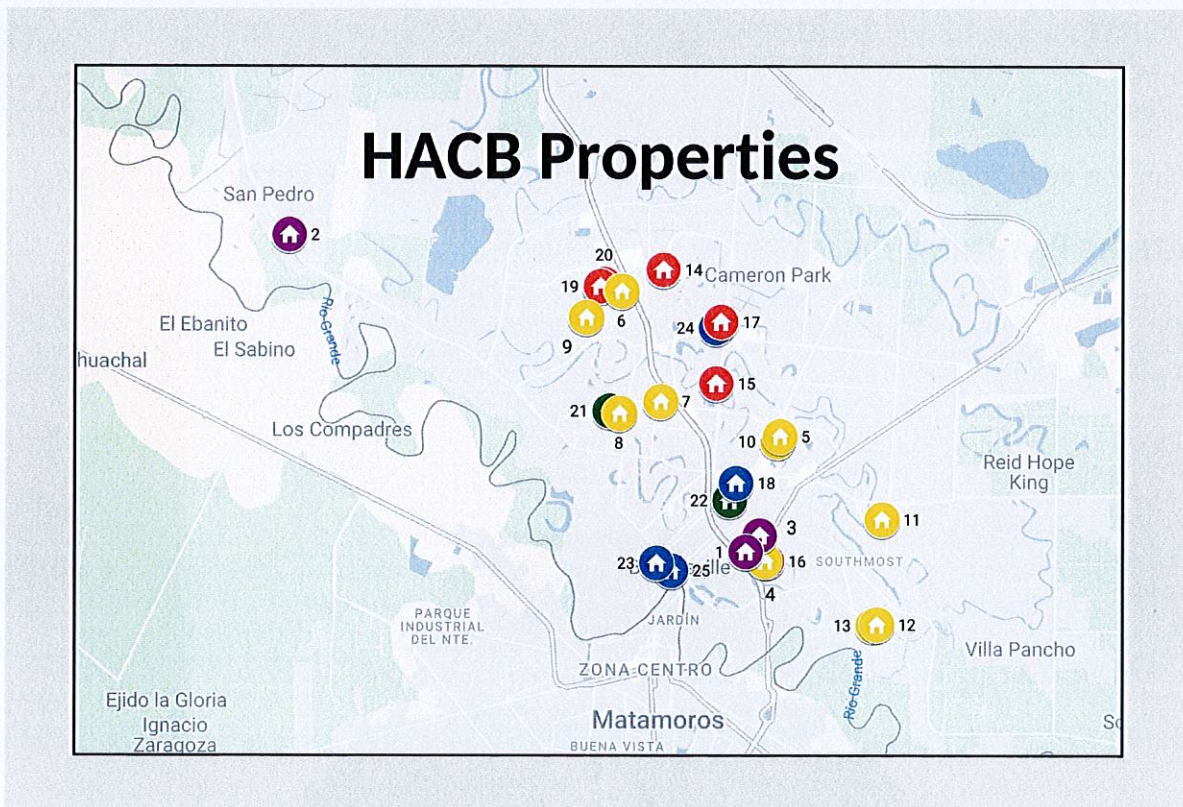
#### Strategic Planning Committee Members, listed left to right:

Isabel Nuñez, Director of Housing Facilities; Robert Wilson, Human Resources Officer; Fay Garcia, Property Manager; Leticia Gonzalez, Director of Client Services; Magda Fernandez, Family Self Sufficiency Coordinator; Ana Trejo, Director of Supportive Services; Jesse Miller, HACB Vice Chairman; Carla Mancha, CEO; Miguel Herrera, CFO; Luis Eduardo Garduño, HACB Chairman. Not pictured: Diana Bustinza, Client Services Coordinator, Carmen Rivera, Resident-Linda Vista.



### HACB PROPERTY LOCATIONS

HACB properties are distributed throughout the City of Brownsville. Our portfolio includes four Public Housing properties, eight HACB Tax Credit properties, and nine properties that have been converted from Public Housing to the Rental Assistance Demonstration Program (RAD). The map below shows the locations of our developments.



#### **Rental Assistance Demonstration (RAD)**

- 4 - Citrus Annex (36)
- 5 - Linda Vista (54)
- 6 - Roe Gardens (45)
- 7 - Las Brisas (54)
- 8 - Sunset Terrace (40)
- 9-13 Scattered Site(s) (5)



#### **Public Housing**

- 1 - Victoria Gardens (46)
- 2 - Sanchez Vela (30)
- 3 - Tangelo Quarters (18)



#### **Tax Credit**

- 14 - Bella Terra (80)
- 15 - Candlewick Apartments (132)
- 16 - Citrus Garden Apartments (148)
- 17 - Paseo Plaza (184)
- 19 - Rancho del Cielo I (130)
- 20 - Rancho del Cielo II (120)



#### **Tax Credit/Public Housing**

- 21 - Sunset Haven (100)
- 22 - Tropical Gardens (158)



#### **Tax Credit/**

- #### **Rental Assistance Demonstration (RAD)**
- 18 - Poinsettia Gardens at Boca Chica (150)
  - 23 - Villa del Sol (200)
  - 24 - Trail Village (48)
  - 25 - El Jardin (44)\*

*\*El Jardin is under construction.*



### STAKEHOLDER SURVEYS

Key stakeholder groups were surveyed between August and October 2021.

#### Employee Survey

43 Responses



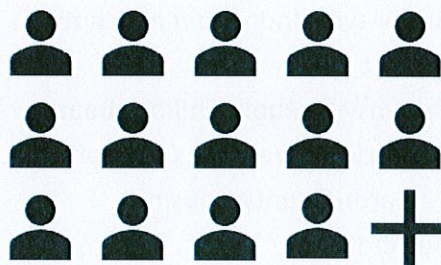
#### Resident Survey

161 Responses



#### HCV Participant Survey

145 Responses



#### Landlord Survey

90 Responses



#### Vendor Survey

18 Responses





## THE PLAN | STAKEHOLDER ENGAGEMENT

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### VISION SETTING RETREAT

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Bronner Group, LLC (BRONNER) facilitated a Vision Setting Retreat with members of the HACB Strategic Planning Committee, including members of the Board of Commissioners on November 16th and 17th, 2021. During the retreat, participants revised the HACB mission and vision statements, and identified five strategic goals and preliminary objectives.

### STRATEGIC PLAN EMPLOYEE FEEDBACK SURVEY

HACB solicited feedback from staff on the draft Strategic Goals and Objectives through an employee survey. Employees provided feedback through the survey on prioritization and advice for implementation.

57 HACB staff participated.



### ACTION PLANNING WORKING GROUP MEETINGS

BRONNER representatives facilitated a series of working group meetings from January 3rd to January 12th. During these meetings Strategic Planning Committee Members collaborated on strategy and action planning.

Held **8 meetings** to discuss each goal, the supporting objectives, and identify actions.



Prioritized actions and drafted metrics for **130+ action items**.





## WHERE WE'RE GOING | OVERVIEW

This Strategic Plan contains five Goals, three focused on Housing, People, and Community. Two supporting goals are focused on our Organization and building Capacity to support the plan. Each goal contains strategic objectives and specific action items to support HACB's success.



### MISSION

To increase opportunities for affordable, quality housing and support self-sufficiency through collaborative partnerships.

### VISION

**Housing:** Increase the number of high-quality, well-managed, affordable units that are responsive to the needs of the community.

**People:** Improve health, safety, employment, mobility, and educational outcomes with responsive and relevant resources delivered to our community.

**Community:** Create the conditions necessary for public and private investments in community assets and amenities that will help families live their best life.

## GOALS

1. **Housing:** Promote high quality affordable housing by increasing HACB-supported units by 1,000 by 2027.
2. **People:** Provide high quality, impactful services to 200 more households by 2027.
3. **Community:** Promote strong communities through collaborative initiatives and coordination of services and programs.
4. **Organization:** Support an organizational culture of excellence by continuing to invest in and empower our greatest asset, our employees.
5. **Capacity:** Build capacity for a comprehensive approach to housing, people, and community.



## GOALS | #2 PEOPLE

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*Provide high quality, impactful services to 200 more households by 2027.*

### OBJECTIVES

- 1** Assist households on the waitlist (both Housing Choice Voucher and Public Housing) to obtain affordable, stable housing and reduce waitlist time from approximately 12 to 6 months.
- 2** Assist an additional 200 households through voucher programs.
- 3** Improve the overall Client Services experience.
- 4** Improve communication with HACB households.
- 5** Strengthen capacity for continuous improvement based on client and partner feedback.



*HACB Receptionist Daniella Cruz assisting clients in February 2021.*



## GOALS | #4 ORGANIZATION

*Support an organizational culture of excellence by continuing to invest in and empower our greatest asset, our employees.*

### STRATEGIES

- 1 Update the organizational structure and staffing plan.
- 2 Strengthen and reinforce employee skills and knowledge to meet the evolving needs of the agency.
- 3 Improve communication via processes, training, and tools.
- 4 Attract and retain qualified and competent employees through competitive compensation and a flexible/desirable work environment.
- 5 Continually improve management of organizational resiliency with an emphasis on both responsiveness and recovery.
- 6 Promote a culture of excellence.



*The HACB Team gathered virtually to celebrate the team's accomplishments at the end of FY 2021.*

*The HACB Team celebrated the Ribbon Cutting Ceremony and Inauguration of BiblioTech Brownsville at Poinsettia Gardens at Boca Chica in August 2021.*





## HOW WE'LL GET THERE | GET INVOLVED

The Housing Authority of the City of Brownsville Strategic Plan is more than a report. It is a living, breathing plan that needs your support. Help us reach our goals and make Brownsville a better home for all!

STAY INFORMED AND GET INVOLVED! | [WWW.HACB.US](http://WWW.HACB.US)



RESIDENTS & PARTICIPANTS



LANDLORDS



VENDORS



GOVERNMENT AGENCIES



NONPROFIT PARTNERS



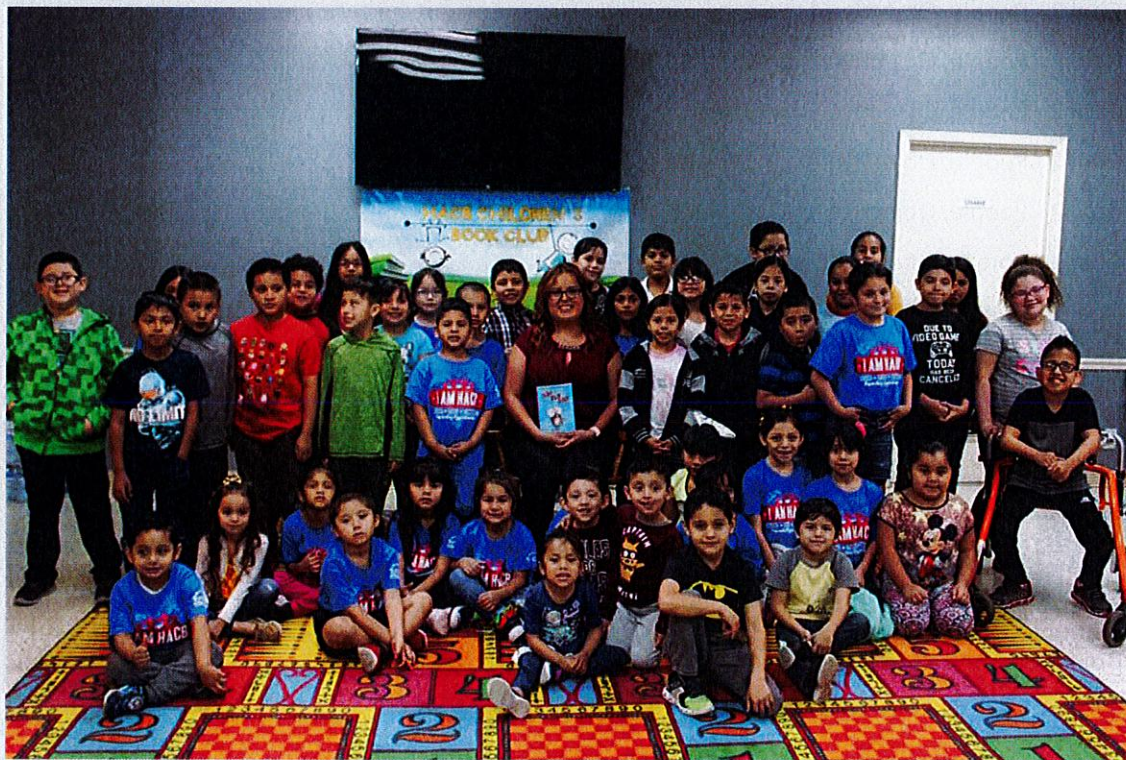
Members of the HACB and COB, along with the Choice Neighborhood Coordinator (COLLABO and Borderless Studio), held their kick-off meeting with HUD to officially start the International Southmost Choice Neighborhood Initiative (CNI) Planning Grant. Brownsville was one of eight communities awarded a CNI Planning Grant in 2021. HACB's public housing property Victoria Gardens is the anchor for the project.



## HOW WE'LL GET THERE | THANK YOU

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To residents, HCV participants, landlords, partners, stakeholders, HACB staff, the Strategic Planning Committee, and the Board of Commissioners, HACB thanks you for your dedication to the strategic planning process.



*HACB children with BISD Trustee Jessica Gonzalez at the monthly HACB Reading Event in January 2020.*



## Action Plan: Goal 1 - Housing, Objective 1

|   |                     |                         |            |                    |
|---|---------------------|-------------------------|------------|--------------------|
| Goal 1 - Housing: Promote high quality affordable housing by increasing HACB-supported units by 1,000 by 2027.  |                     |                         |            |                    |
| Objective: Create at least 500 new units of housing.  |                     |                         |            |                    |
| Responsible Person  | Supporting Person   | Priority                | Start Year | End Year           |
| Carla Mancha, CEO   | Miguel Herrera, CFO | High                    | Year 1     | Year 5 and Ongoing |
| Performance Measure, Target Date, or Deliverable  |                     |                         |            |                    |
| Output  |                     | Outcome                 |            |                    |
| 100 new units of housing created per year   |                     | 100% of target achieved |            |                    |
| Actions   |                     |                         |            |                    |
| <ul style="list-style-type: none"><li>✓ Create a comprehensive development plan for HACB that specifies how many units HACB will develop, where, and for which populations over a five year period.</li><li>✓ Assess current portfolio to ensure existing properties are meeting the needs of communities.</li><li>✓ Identify and pursue opportunities for HACB to acquire and develop vacant and developed properties.</li><li>✓ Develop vacant land owned by HACB.</li><li>✓ Work with the City to align Development Plan and Guidelines with City goals (e.g., discuss new City Zoning Ordinance).</li><li>✓ Identify highest need populations with the City and the Choice Neighborhoods Initiatives Grant housing study and align with Development Plan (Related to Goal 5).</li></ul> |                     |                         |            |                    |



Action Plan: Goal 1 - Housing, Objective 3

|   |                   |   |            |          |
|---|-------------------|---|------------|----------|
| Goal 1 - Housing: Promote high quality affordable housing by increasing HACB-supported units by 1,000 by 2027.  |                   |   |            |          |
| Objective: Promote the development of quality housing with units of adequate size, amenities and features that is responsive to resident needs.   |                   |   |            |          |
| Responsible Person  | Supporting Person | Priority  | Start Year | End Year |
| Miguel Herrera, CFO   | Carla Mancha, CEO | High  | Year 1     | Year 5   |
| Performance Measure, Target Date, or Deliverable  |                   |   |            |          |
| Output  |                   | Outcome   |            |          |
| Number of units developed per year in alignment with HACB development guidelines  |                   | Total number of units developed in alignment with HACB development guidelines |            |          |
| Actions   |                   |   |            |          |
| <ul style="list-style-type: none"><li>✓ Create clear, but flexible development guidelines.</li><li>✓ Identify and pursue opportunities to develop mixed-use or multi-use communities.</li><li>✓ Identify and pursue opportunities to develop Supportive Housing communities.</li><li>✓ Solicit feedback from families on housing quality, size, amenities, and features responsive to resident needs.</li></ul> |                   |   |            |          |



### Action Plan: Goal 1 - Housing, Objective 5

|   |                     |   |            |          |
|---|---------------------|---|------------|----------|
| Goal 1 - Housing: Promote high quality affordable housing by increasing HACB-supported units by 1,000 by 2027.  |                     |   |            |          |
| Objective: Develop stronger partnerships to create and finance more affordable housing.   |                     |   |            |          |
| Responsible Person  | Supporting Person   | Priority  | Start Year | End Year |
| Carla Mancha, CEO   | Miguel Herrera, CFO | High  | Year 2     | Year 5   |
| Performance Measure, Target Date, or Deliverable  |                     |   |            |          |
| Output  |                     | Outcome   |            |          |
| Amount in grant funding secured per year to support creation of affordable housing opportunities  |                     | Total amount in grant funding secured to support creation of affordable housing opportunities |            |          |
| Number of MOUs in place with key partners per year  |                     | Number of MOUs in place with key partners   |            |          |
| Actions   |                     |   |            |          |
| <div>✓ Cooperate with other entities to obtain grants to create more affordable housing opportunities.</div> <div>✓ Improve communication of HACB roles and responsibilities in the context of partnerships by instituting quarterly meetings with key partners.</div> <div>✓ Review and frequently revise MOUs with partners.</div> <div>✓ Develop a stronger partnership with CDCB as a potential financing partners.</div> <div>✓ Strengthen partnership with Friendship of Women to develop Supportive Housing.</div> |                     |   |            |          |



Action Plan: Goal 1 - Housing, Objective 7

|   |                                |  |            |          |
|---|--------------------------------|--|------------|----------|
| Goal 1 - Housing: Promote high quality affordable housing by increasing HACB-supported units by 1,000 by 2027.  |                                |  |            |          |
| Objective: Work with the City of Brownsville and other partners to address all affordable housing needs in the city.  |                                |  |            |          |
| Responsible Person  | Supporting Person              | Priority   | Start Year | End Year |
| Carla Mancha, CEO   | Ana Trejo, Supportive Services | High   | Year 1     | Year 5   |
| Performance Measure, Target Date, or Deliverable  |                                |  |            |          |
| Output  |                                | Outcome  |            |          |
| Status of HACB partnership with the City of Brownsville   |                                | Number of collaborative initiatives with the City of Brownsville to address affordable housing needs in the city |            |          |
| Actions   |                                |  |            |          |
| <div>✓ Collaborate with the City to identify strategies to address housing needs of middle-income families (50%-80%).</div> <div>✓ Collaborate with the City to identify strategies to address housing needs of mixed status families.</div> <div>✓ Develop a specialized skillset for rehabilitating historic buildings.</div> |                                |  |            |          |



Action Plan: Goal 2 - People, Objective 2

|   |                                |   |            |          |
|---|--------------------------------|---|------------|----------|
| Goal 2 - People: Provide high quality, impactful services to 200 more households by 2027  |                                |   |            |          |
| Objective: Assist an additional 200 households through voucher programs.  |                                |   |            |          |
| Responsible Person  | Supporting Person              | Priority  | Start Year | End Year |
| Leticia Gonzalez, Client Services   | Ana Trejo, Supportive Services | Medium  | Year 1     | Year 5   |
| Performance Measure, Target Date, or Deliverable  |                                |   |            |          |
| Output  |                                | Outcome   |            |          |
| Number of additional households assisted with vouchers; voucher utilization rate (as close to 100% as possible)   |                                | 200 additional households served through voucher programs |            |          |
| Actions   |                                |   |            |          |
| <ul style="list-style-type: none"><li>✓ Reach for and maintain 100% voucher utilization rate.</li><li>✓ Apply for and obtain new vouchers through mainstream vouchers, FUP Families, FUP Youth, Emergency Housing Vouchers.</li><li>✓ Revise MOUs with partner organizations as needed to support households in accessing vouchers.</li><li>✓ As vouchers increase, assess and adjust staffing levels and distribution of responsibilities.</li></ul> |                                |   |            |          |



Action Plan: Goal 2 - People, Objective 4

|  |                                |   |            |          |
|--|--------------------------------|---|------------|----------|
| Goal 2 - People: Provide high quality, impactful services to 200 more households by 2027   |                                |   |            |          |
| Objective: Improve communication with HACB households.   |                                |   |            |          |
| Responsible Person   | Supporting Person              | Priority  | Start Year | End Year |
| Leticia Gonzalez, Client Services  | Ana Trejo, Supportive Services | High  | Year 1     | Year 5   |
| Performance Measure, Target Date, or Deliverable   |                                |   |            |          |
| Output   |                                | Outcome   |            |          |
| Status of process and procedure updates<br>Number of households interacting with HACB per month<br>Client Services staff average length of interaction<br>Customer satisfaction scores   |                                | Families are fully informed about program rules, how to apply, and options should be easier for clients to understand |            |          |
| Actions  |                                |   |            |          |
| ✓ Streamline communication with HACB households.<br>✓ Research and consider purchasing a mass communications tool (centralize and streamline mass communications via email, phone, text, etc.).<br>✓ Collect and analyze data on Client Services time spent serving clients to identify opportunities to streamline and improve customer experience. |                                |   |            |          |



Action Plan: Goal 3 - Community, Objective 1

|  |                                  |   |            |                    |
|--|----------------------------------|---|------------|--------------------|
| Goal 3 - Community: Promote strong communities through collaborative initiatives and coordination of services and programs.  |                                  |   |            |                    |
| Objective: Revitalize and expand programs targeted to supporting youth in HACB households.   |                                  |   |            |                    |
| Responsible Person   | Supporting Person                | Priority  | Start Year | End Year           |
| Ana Trejo, Supportive Services   | Isabel Nunez, Housing Facilities | High  | Year 1     | Year 5 and Ongoing |
| Performance Measure, Target Date, or Deliverable   |                                  |   |            |                    |
| Output   |                                  | Outcome   |            |                    |
| Number of new households enrolled in youth programs  |                                  | Increase in the number of students in HACB households who graduate high school and matriculate through post-graduate pathways |            |                    |
| Actions  |                                  |   |            |                    |
| <ul style="list-style-type: none"><li>✓ Assess and adjust for needed capacity to recruit and expand services to serve all HACB households (includes HCV, tax credit properties, properties not served by Opportunity Centers currently (staff, partnerships, etc.).</li><li>✓ Promote a Cradle to College program that will impact 100% of children in HACB's households.</li><li>✓ Deepen and expand partnerships with local educational institutions (BISD, local charter schools, private schools, TSC, and UTRGV) to connect families to services.</li><li>✓ Maximize resources by partnering with established organizations on Head Start Programs.</li></ul> |                                  |   |            |                    |



### Action Plan: Goal 3 - Community, Objective 3

|  |                   |   |            |          |
|--|-------------------|---|------------|----------|
| Goal 3 - Community: Promote strong communities through collaborative initiatives and coordination of services and programs.  |                   |   |            |          |
| Objective: Work with partners to promote access to healthcare.   |                   |   |            |          |
| Responsible Person   | Supporting Person | Priority  | Start Year | End Year |
| Ana Trejo, Supportive Services   | Carla Mancha, CEO | High  | Year 1     | Year 3   |
| Performance Measure, Target Date, or Deliverable   |                   |   |            |          |
| Output   |                   | Outcome   |            |          |
| Number of MOUs executed<br>Number of referrals made under MOUs<br>Status of collaborating with Horizon   |                   | Feedback from resident and participant surveys regarding access to healthcare indicates improvement over time |            |          |
| Actions  |                   |   |            |          |
| <ul style="list-style-type: none"><li>✓ Work with Horizon (formerly Brownsville Community Health Clinic) to bring services to the previous facility to ensure access for HACB families living nearby.</li><li>✓ Institute quarterly communication with Outreach Specialists of all healthcare providers in Brownsville to share information about available resources (includes funding, available programs, initiatives).</li><li>✓ Establish and formalize partnership with Brownsville area clinics.</li><li>✓ Establish and formalize partnerships with Valley Regional and Valley Baptist to deliver preventative service and programs.</li><li>✓ Identify partners and work together to promote preventative dental care and cleanings.</li><li>✓ Collaborate with partners to ensure workshops on insurance, Medicare, Medicaid are provided.</li></ul> |                   |   |            |          |



### Action Plan: Goal 3 - Community, Objective 5

|   |                   |  |            |                    |
|---|-------------------|--|------------|--------------------|
| Goal 3 - Community: Promote strong communities through collaborative initiatives and coordination of services and programs.   |                   |  |            |                    |
| Objective: Cultivate and promote resident and participant leadership.   |                   |  |            |                    |
| Responsible Person  | Supporting Person | Priority   | Start Year | End Year           |
| Ana Trejo, Supportive Services  | Carla Mancha, CEO | Medium   | Year 1     | Year 5 and Ongoing |
| Performance Measure, Target Date, or Deliverable  |                   |  |            |                    |
| Output  |                   | Outcome  |            |                    |
| Completion of biennial leadership trainings<br>Number of participants at leadership trainings<br>Status of SOPs and SLAs<br>Amount of funding opportunities secured   |                   | All Resident Association Officer positions are filled<br>Over five years, resident participation numbers in RA meetings and events increases |            |                    |
| Actions   |                   |  |            |                    |
| <ul style="list-style-type: none"><li>✓ Ensure clear, consistent communication and productive working relationship between HACB and RAs/RAB.</li><li>✓ Conduct ongoing active recruitment for Resident Association Officers.</li><li>✓ Identify and secure funding and additional resources to support resident and participant leadership.</li><li>✓ Provide leadership training to RAB and Resident Associations 2x per year.</li><li>✓ Ensure mechanisms are in place to respond to and act upon resident and participant feedback.</li><li>✓ Implement best practices and industry standards for resident and participant leadership in Public Housing Authorities.</li></ul> |                   |  |            |                    |



### Action Plan: Goal 4 - Organization, Objective 2

|   |                     |  |            |                    |
|---|---------------------|--|------------|--------------------|
| Goal 4 - Organization: Support an organizational culture of excellence by continuing to invest in and empower our greatest asset, our employees.  |                     |  |            |                    |
| Objective: Strengthen and reinforce employee skills and knowledge to meet the evolving needs of the agency.   |                     |  |            |                    |
| Responsible Person  | Supporting Person   | Priority   | Start Year | End Year           |
| Bob Wilson, HRO   | Miguel Herrera, CFO | High   | Year 1     | Year 5 and Ongoing |
| Performance Measure, Target Date, or Deliverable  |                     |  |            |                    |
| Output  |                     | Outcome  |            |                    |
| Number of employees with current certifications<br>Number of employees pending certifications<br>Number of team lead reviews completed<br>Number of training hours completed<br>Number of trainings attended by employees<br>Number of employees attended trainings   |                     | Annual assessment and recommendations for anticipated training needs completed by each December (yes/no) |            |                    |
| Actions   |                     |  |            |                    |
| ✓ Create a resource to share and post information about training opportunities.<br>✓ Meet with team leaders to assess and project annual training and re-skilling needs.<br>✓ Annual assessment and recommendations for anticipated training and re-skilling completed by each December.<br>✓ Ensure all certifications are up to date.<br>✓ Develop a streamlined process for training identification, approval, and reporting through HR. |                     |  |            |                    |



Action Plan: Goal 4 - Organization, Objective 4

|   |                   |   |            |                    |
|---|-------------------|---|------------|--------------------|
| Goal 4 - Organization: Support an organizational culture of excellence by continuing to invest in and empower our greatest asset, our employees.  |                   |   |            |                    |
| Objective: Attract and retain qualified and competent employees through competitive compensation and a flexible/desirable work environment.   |                   |   |            |                    |
| Responsible Person  | Supporting Person | Priority  | Start Year | End Year           |
| Bob Wilson, HRO   | Carla Mancha, CEO | High  | Year 1     | Year 5 and Ongoing |
| Performance Measure, Target Date, or Deliverable  |                   |   |            |                    |
| Output  |                   | Outcome   |            |                    |
| Complete Annual Employee Survey focused on compensation, work environment, employee satisfaction<br>Status of flexible work policy<br>Number of succession plans created  |                   | Feedback from Annual Employee Survey indicates high employee satisfaction |            |                    |
| Actions   |                   |   |            |                    |
| ✓ Develop and deploy annual Employee Survey to assess compensation, work environment, and other indicators of employee satisfaction.<br>✓ Maintain competitive compensation and benefits.<br>✓ Identify strategies to improve work/life balance.<br>✓ Identify and execute key roles for succession planning. |                   |   |            |                    |



Action Plan: Goal 4 - Organization, Objective 6

|   |                   |   |            |                    |
|---|-------------------|---|------------|--------------------|
| Goal 4 - Organization: Support an organizational culture of excellence by continuing to invest in and empower our greatest asset, our employees.  |                   |   |            |                    |
| Objective: Promote a culture of excellence.   |                   |   |            |                    |
| Responsible Person  | Supporting Person | Priority  | Start Year | End Year           |
| Bob Wilson, HRO   | Carla Mancha, CEO | Medium  | Year 1     | Year 5 and Ongoing |
| Performance Measure, Target Date, or Deliverable  |                   |   |            |                    |
| Output  |                   | Outcome   |            |                    |
| Status of Employee Appreciation Week<br>Status of HACB standards for appearance and branding<br>Status of plans for office space enhancements<br>Status of merit increase policy revisions<br>Status of flexible work policy<br>Number of employees participating in community/volu   |                   | Feedback from Annual Employee Survey indicates high employee satisfaction |            |                    |
| Actions   |                   |   |            |                    |
| <div>✓ Engage in annual employee re-onboarding activities to build understanding and ownership over mission, vision, values, and goals.</div> <div>✓ Revise and communicate standards for appearance and consistent branding.</div> <div>✓ Identify and prioritize projects to enhance quality of physical office spaces and equipment and communicate plans with staff.</div> <div>✓ Examine and revise merit increase policy; provide relevant supervisor training on updated policies.</div> <div>✓ Review and revise policy, procedure, and communicate expectations for flexibility of work hours and location.</div> <div>✓ Encourage and support employee participation in community initiatives (boards, volunteering, etc.).</div> |                   |   |            |                    |



Action Plan: Goal 5 - Capacity, Objective 2

|  |                   |  |            |          |
|--|-------------------|--|------------|----------|
| Goal 5 - Capacity: Build capacity for a comprehensive approach to housing, people, and community.  |                   |  |            |          |
| Objective: Build capacity for Supporting Housing development.  |                   |  |            |          |
| Responsible Person   | Supporting Person | Priority   | Start Year | End Year |
| Ana Trejo, Supportive Services   | Carla Mancha, CEO | High   | Year 1     | Year 5   |
| Performance Measure, Target Date, or Deliverable   |                   |  |            |          |
| Output   |                   | Outcome  |            |          |
| Status of training with CSH<br>Number of MOUs with potential partners  |                   | At least one supportive housing tax credit application has been submitted by end of Year 5 |            |          |
| Actions  |                   |  |            |          |
| <ul style="list-style-type: none"><li>✓ Request and participate in training and technical assistance from Corporation for Supportive Housing (CSH) through the CSH Supportive Housing Institute.</li><li>✓ Assess community need for supportive housing through collaboration with the Continuum of Care and its constituent members.</li><li>✓ Identify and engage potential partners to develop a Supportive Housing tax credit application.</li><li>✓ Align supportive housing development plans with the overall development plan for HACB. (see also Goal 1)</li><li>✓ Develop and submit a Supportive Housing tax credit application through Brownsville Housing Opportunity Corporation (BHOC).</li></ul> |                   |  |            |          |



Action Plan: Goal 5 - Capacity, Objective 4

|   |                                |  |                   |                 |
|---|--------------------------------|--|-------------------|-----------------|
| <b>Goal 5 - Capacity: Build capacity for a comprehensive approach to housing, people, and community.</b>  |                                |  |                   |                 |
| <b>Objective: Build capacity for research, data analysis, and policy advocacy.</b>  |                                |  |                   |                 |
| <b>Responsible Person</b>   | <b>Supporting Person</b>       | <b>Priority</b>  | <b>Start Year</b> | <b>End Year</b> |
| Carla Mancha, CEO   | Ana Trejo, Supportive Services | Medium   | Year 1            | Year 5          |
| <b>Performance Measure, Target Date, or Deliverable</b>   |                                |  |                   |                 |
| <b>Output</b>   |                                | <b>Outcome</b>   |                   |                 |
| Number of HACB employees working on research, data analysis, and policy-related projects<br>Status of housing needs assessment  |                                | HACB is viewed as a community leader on a variety of affordable housing issues |                   |                 |
| <b>Actions</b>  |                                |  |                   |                 |
| <ul style="list-style-type: none"><li>✓ Assess the possibility of adding a position to focus on communications, public relations, and policy advocacy work.</li><li>✓ Build capacity to pursue “Healthy Housing” initiatives (e.g., health sector partnerships, addressing social determinants of health, review of housing hazards, etc.).</li><li>✓ Together with community partners, lead a study to assess the true housing need in Brownsville and identify recommendations.</li></ul> |                                |  |                   |                 |



**Attachment: tx007f01**

**Housing Authority of the City of Brownsville  
Rental Assistance Demonstration (RAD)**

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# Attachment R

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Rental Assistance Demonstration (RAD)  
Description of units to be converted  
Section 1.6 & 1.6D of PIH Notice  
2012-32  
Changes in Eligibility, Admission,  
Selection and Occupancy.



### **Attachment R – Rental Assistance Demonstration (RAD)**

The Housing Authority of the City of Brownsville (HACB) is amending its Annual and/or 5-Year PHA Plan because it was a successful applicant in the Rental Assistance Demonstration (RAD). As a result, the HACB will be converting to Project Based Vouchers under the guidelines of PIH Notice 2012-32, REV-1 and any successor Notices. Upon conversion to Project Based Vouchers the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in: Section 1.6.C & 1.6.D of PIH Notice 2012-32, REV-1. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. Additionally, the HACB is currently compliant with all fair housing and civil rights requirements and is not under a Voluntary Compliance Agreement.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing HACB with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that HACB may also borrow funds to address their capital needs. The HACB will also be contributing Operating Reserves in the amount of \$4,517,377.85 Capital Funds in the amount of \$559,935.00 towards the conversion. Below, please find specific information related to the Public Housing Development(s) selected for RAD:

**CHANGES IN ELIGIBILITY, ADMISSION, SELECTION AND OCCUPANCY**

There are very few expected changes in eligibility, admission, selection, and occupancy of units policies as a result of the RAD conversion other than those required by the project-base voucher program under 24 CFR Part 983. The HACB's Administrative Plan includes a chapter of Project Based Vouchers in Chapter 17. The following changes are known based on the difference between HUD public housing regulations and HUD project-based vouchers regulations:

1. Earned Income Disability-public housing residents are eligible even if they are not disabled. A public housing resident that is utilizing the EID, will continue to be eligible after conversion, even if they are not disabled. However, new residents in PBV units will only be eligible if they are disabled.
2. Public Housing Income limits are 80% AMI and PBV income limits are 50% AMI. At the time of conversion, an over-income tenant is allowed to stay in a RAD PBV unit and the unit will remain assisted until the tenant moves. However, if the unit also has Low Income Housing Tax Credit Financing, the tenant must meet the LIHTC income limits. The HACB will offer public housing residents who are over-income and living in a unit that will be receiving LIHTC, an opportunity to move into a RAD PBV unit that does not have LIHTC restrictions.
3. Lease Terminations for Public Housing units allow 14-day notice for nonpayment, up to 30-days' notice for activities that threaten others or for drug or other violent crimes. PBV units are required to follow state and local laws.
4. Over or under-housed tenants will be relocated to an appropriate sized unit after rehabilitation is completed as a result of the conversion from public housing to PVB.



**Table 1: List of RAD Program Elements Affecting Resident Rights and Participation, Waiting List and Grievance Procedures for PBV and PBRA**

Below, please find a table listing out each of the provisions affecting residents' rights and participation, waiting list and grievance procedures that must be included in a PHA's Significant Amendment. The table lists out the provisions applicable to the type of conversion (PBV or PBRA) that the PHA is proposing.

| <b>Project Based Voucher Requirements (Section 1.6.C &amp; D of PIH Notice 2012-32)</b>   | <b>Project Based Rental Assistance Requirements (Section 1.7.B &amp; C of PIH Notice 2012-32)</b>  |
|---|--|
| 1. No re-screening of tenants upon conversion;  | 1. No re-screening of tenants upon conversion;   |
| 2. Resident right to return if relocated as a result of conversion;   | 2. Resident right to return if relocated as a result of conversion;  |
| 3. Phase-in of tenant rent increase:<br><br>If the rent increase is the greater of 10% or \$25, the increase will be phased in over 3 years or five years, as determined by the PHA;  | 3. Phase-in of tenant rent increase:<br><br>If the rent increase is the greater of 10% or \$25, the increase will be phased in over 3 years or five years, as determined by the PHA;   |
| 4. Continued eligibility for PH-FSS and ROSS-SC programs;   | 4. Continued eligibility for PH-FSS and ROSS-SC programs;  |
| 5. Resident Participation and Funding.<br><br>Residents will have the right to establish and operate a resident organization and be eligible for resident participation funding. See Attachment 1B of PIH Notice 2012-032.  | 5. Resident Participation and Funding.<br><br>Residents will have the right to establish and operate a resident organization and be eligible for resident participation funding. See Attachment 1B of PIH Notice 2012-032.   |
| 6. Termination notification:<br><br>PHA must provide written notification of termination of lease within a reasonable time: <ul style="list-style-type: none"> <li>i. not to exceed 30 days if health or safety of other tenants, PHA employees or persons residing in the vicinity are threatened or in the event of drug-related or violent criminal activity or any felony conviction;</li> <li>ii. 14 days for non-payment of rent;</li> <li>iii. 30 days in any other case unless State or local law provide for a shorter time period.</li> </ul> | 6. Termination notification:<br><br>PHA must provide written notification of termination of lease within a reasonable time: <ul style="list-style-type: none"> <li>i. not to exceed 30 days if health or safety of other tenants, PHA employees or persons residing in the vicinity are threatened or in the event of drug-related or violent criminal activity or any felony conviction;</li> <li>ii. 14 days for non-payment of rent;</li> <li>iii. in all other cases, the requirements at 24 CFR §880.603, as revised for RAD in PIH Notice 2012-32, the Multifamily HUD Model Lease and any other HUD multifamily administrative guidance shall apply;</li> </ul> |

|  |   |
|--|---|
| 7. Grievance process<br><br>See PIH Notice 2012-32 Section 1.6.C.7   | 7. Grievance process<br><br>See PIH Notice 2012-32 Section 1.7.B.6  |
| 8. Establishment of Waiting List<br><br>See PIH Notice 2012-32 Section 1.6.D   | 8. Establishment of Waiting List<br><br>See PIH Notice 2012-32 Section 1.7.C  |
| 9. Earned Income Disregard.<br><br>Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time. (Please See PIH Notice 2012-32, Section 1.6.C.8) | 9. Earned Income Disregard.<br><br>Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 960.255. If a tenant requests that the EID cease, or upon the expiration of the EID for such tenants, the tenant will no longer receive the EID exclusion and the Owner will no longer be subject to the provisions of 24 CFR §960.255. Furthermore, tenants whose EID ceases or expires after conversion shall not be subject to the rent phase-in provision, as described in Section 1.7.B.3; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time. (Please See PIH Notice 2012-32, Section 1.7.B.7) |
| 10. PHA's are required to renew the lease at Expiration unless good cause exists for non-renewal   | N/A   |



**Development 1**

| Name of Public Housing Development | PIC Development ID                              | Conversion Type (i.e., PBV or PBRA):   | Transfer of Assistance                                     |
|------------------------------------|---|--|--|
| Linda Vista                        | TX007010105                                     | PBV                                    | NO   |
| Las Brisas                         | TX007010105                                     | PBV                                    | NO   |
| Sunset Terrace                     | TX007010105                                     | PBV                                    | NO   |
| Scattered Sites                    | TX007010105                                     | PBV                                    | NO   |
| Rose Gardens                       | TX007010105                                     | PBV                                    | NO   |
| Total Units                        | Pre-RAD Unit Type (i.e., Family, Senior, Etc.): | Number of Units Post-Conversion        | Capital Fund allocation of Development                     |
| 198                                | Family  | NA                                     | \$343,176.00   |
| Bedroom Type                       | Number of Units Pre-Conversion<br>198           | Number of units Post-Conversion<br>198 | Change in Number of Units per Bedroom Type and Why<br>None |
| Studio/Efficiency                  |   |  | 0  |
| One Bedroom                        | 12  | 12                                     | 0  |
| Two Bedroom                        | 54  | 54                                     | 0  |
| Three Bedroom                      | 101   | 101                                    | 0  |
| Four Bedroom                       | 31  | 31                                     | 0  |
| Five Bedroom                       |   |  |  |
| Six Bedroom                        |   |  |  |
| (If performing a Transfer of       | No Transfer of Assistance                       |  |  |

**Development 2**

| Name of Public Housing Development | PIC Development ID                              | Conversion Type (i.e., PBV or PBRA): | Transfer of Assistance                             |
|------------------------------------|---|--------------------------------------|--|
| Citrus Annex                       | TX007010103                                     | PBV                                  | NO   |
| Total Units                        | Pre-RAD Unit Type (i.e., Family, Senior, Etc.): | Number of Units Post-Conversion      | Capital Fund allocation of Development             |
| 36                                 | Family  | NA                                   | \$ 47,570.00                                       |
| Bedroom Type                       | Number of Units Pre-Conversion                  | Number of units Post-Conversion      | Change in Number of Units per Bedroom Type and Why |
| Studio/Efficiency                  |   |                                      |  |
| One Bedroom                        |   |                                      |  |
| Two Bedroom                        |   |                                      |  |
| Three Bedroom                      | 31  | 31                                   | 0  |
| Four Bedroom                       | 5   | 5                                    | 0  |
| Five Bedroom                       |   |                                      |  |
| Six Bedroom                        |   |                                      |  |
| (If performing a Transfer of       | No Transfer of Assistance                       |                                      |  |



f

**Development 3**

| Name of Public Housing Development | PIC Development ID                              | Conversion Type (i.e., PBV or PBRA): | Transfer of Assistance                             |
|------------------------------------|---|--------------------------------------|--|
| Villa Del Sol                      | TX007010107                                     | PBV                                  | NO   |
| Total Units                        | Pre-RAD Unit Type (i.e., Family, Senior, Etc.): | Number of Units Post-Conversion      | Capital Fund allocation of Development             |
| 140                                | Family  | NA                                   | \$169,189.00                                       |
| Bedroom Type                       | Number of Units Pre-Conversion                  | Number of units Post-Conversion      | Change in Number of Units per Bedroom Type and Why |
| Studio/Efficiency                  | 90  | 90                                   | 0  |
| One Bedroom                        | 47  | 47                                   | 0  |
| Two Bedroom                        | 3   | 3                                    | 0  |
| Three Bedroom                      |   |                                      |  |
| Four Bedroom                       |   |                                      |  |
| Five Bedroom                       |   |                                      |  |
| Six Bedroom                        |   |                                      |  |
| (If performing a Transfer of       | No Transfer of Assistance                       |                                      |  |

## **Chapter 18**

### **PROJECT BASED VOUCHERS (PBV) UNDER THE RENTAL ASSISTANCE DEMONSTRATION (RAD) PROGRAM**

#### **INTRODUCTION**

This chapter describes HUD regulations and HACB policies related to the Project-Based Voucher (PBV) program under the Rental Assistance Demonstration (RAD) program in eight parts:

Part I: General Requirements. This part describes general provisions of the PBV program, including maximum budget authority requirements, relocation requirements, and equal opportunity requirements.

Part II: PBV Project Selection. This part describes the cap on assistance at projects receiving PBV assistance, ownership and control, and site selection standards.

Part III: Dwelling Units. This part describes requirements related to housing quality standards, the type and frequency of inspections, and housing accessibility for persons with disabilities.

Part IV: Housing Assistance Payments Contract. This part discusses HAP contract requirements and policies including the execution and term of the HAP contract.

Part V: Selection of PBV Program Participants. This part describes the requirements and policies governing how the HACB and the owner will select a family to receive PBV assistance.

Part VI: Occupancy. This part discusses occupancy requirements related to the lease and describes under what conditions families are allowed or required to move.

Part VII: Determining Contract Rent. This part describes how the initial rent to owner is determined, and how rent will be redetermined throughout the life of the HAP contract.

Part VIII: Payments to Owner. This part describes the types of payments owners may receive under this program.



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**PART I: GENERAL REQUIREMENTS****18-I.A. OVERVIEW AND HISTORY OF THE RAD PROGRAM**

The Rental Assistance Demonstration (RAD) program was authorized in 2012 to assess the effectiveness of converting public housing, moderate rehabilitation properties, and units under the rent supplement and rental assistance payments programs to long-term, project-based Section 8 rental assistance. The program's four primary objectives are to:

- Preserve and improve public and other assisted housing.
- Standardize the administration of the plethora of federally subsidized housing programs and rules. The conversions are intended to promote operating efficiency by using a Section 8 project-based assistance model that has proven successful and effective for over 30 years. In other words, RAD aligns eligible properties more closely with other affordable housing programs.
- Attract private market capital for property renovations. Through the use of this model, properties may be able to leverage private debt and equity to make capital repairs.
- Increase tenant mobility opportunities.

Under the first component, the HACB with public housing units may submit an application to HUD to convert some or all of their public housing units to long-term, project-based Section 8 HAP contracts under either:

- Project-based rental assistance (PBRA) under HUD's Office of Multifamily Housing Programs.
- Project-based vouchers (PBVs) under HUD's Office of Public and Indian Housing (PIH).

This chapter will focus on public housing conversions to the PBV program under RAD. In order to distinguish between requirements for public housing conversion under RAD and PBV units under the standard PBV program, we will refer to the standard PBV program and the RAD PBV program.

### **18-I.B. APPLICABLE REGULATIONS**

On the whole, the regulations for both the standard and RAD PBV programs generally follow the regulations for the tenant-based HCV program found at 24 CFR Part 982. However, important parts of the tenant-based regulations do not apply to the project-based program. 24 CFR Part 983 outlines the sections of 24 CFR Part 982 that are not applicable to the project-based program.

For the RAD PBV program, Congress authorized HUD to waive certain statutory and regulatory provisions or establish alternative requirements from the standard PBV program. These provisions are identified in Notice PIH 2012-32, REV-2 (issued June 15, 2015) and Notice PIH 2012-32, REV-3 (issued January 12, 2017).

Otherwise, all regulatory and statutory requirements for the standard PBV program in 24 CFR Part 983 and Section 8(o) (13) of the Housing Act of 1937, and all applicable standing and subsequent Office of Public and Indian Housing (PIH) guidance, including related handbooks, apply to RAD PBV. This includes environmental review, Davis-Bacon, and fair housing requirements.

RAD is authorized by the Consolidated and Further Continuing Appropriations Act of 2012 (Public Law 112-55, approved November 18, 2011), as amended by the Consolidated Appropriations Act of 2014 (Public Law 113-76, approved January 17, 2014), and the Consolidated and Further Continuing Appropriations Act of 2015 (Public Law 113-235, approved December 6, 2014), and Division L, Title II, Section 237 of the Consolidated Appropriations Act (Public Law 114-113, enacted December 18, 2015) collectively, the “RAD Statute.” Requirements specific to the RAD program may be found in the following:

- Generally, public housing projects converting assistance under RAD are bound by the terms of the notice in effect at the time of closing. Notice PIH 2012-32, REV-3 is applicable to projects converting assistance through RAD, including those where a CHAP has already been issued, upon the expiration of the 30-day comment period after publication of the notice. Notice PIH 2012-32, REV-3 was published January 12, 2017.
- Notice PIH 2012-32, REV-2, RAD – Final Implementation, REV-2 is applicable to projects converting assistance through RAD upon the expiration of the 30-day comment period after publication of the Notice. PIH Notice 2012-32, REV-2 was published June 15, 2015.

**NOTE: The policies in this chapter follow Notice PIH 2012-32, REV-3. If your project falls under REV-2, applicable policies may be found in the applicable sections of the Instruction Guide for Chapter 18.**



- RAD Quick Reference Guide for Public Housing Converting to PBV Assistance (10/14)
- RAD Welcome Guide for New Awardees: RAD 1st Component (3/15)
- Notice PIH 2016-17, Rental Assistance Demonstration (RAD) Notice Regarding Fair Housing and Civil Rights Requirements and Relocation Requirements Applicable to RAD First Component – Public Housing Conversions.

This Notice applies to all projects that have applied for RAD conversion but have not yet converted as of November 10, 2016.

- Notice PIH 2014-17, Relocation Requirements under the RAD Program, Public Housing in the First Component.

This notice may apply to projects that have converted to RAD prior to November 10, 2016, AND who have requested and received approval from HUD to be governed by this notice. See PIH Notice 2016-17, Section 1, Paragraph 1.3 for applicability.

**NOTE: The policies in this chapter follow Notice PIH 2016-17. If your project falls under PIH 2014-17, applicable policies may be found in Section 18-I.D.**

- RAD FAQs (<http://www.radresource.net/search.cfm>)

In other words, the standard PBV program follows many of the same regulations as the tenant-based HCV program, but not all of them, and the RAD PBV program follows many of the same regulations as the standard PBV program, but not all of them.

MTW agencies are able to apply activities impacting the PBV program that are approved in the MTW Plan to properties converting under RAD, provided they do not conflict with RAD requirements.

### **18-I.C. TENANT-BASED VS. PROJECT-BASED VOUCHER ASSISTANCE [24 CFR 983.2]**

Much of the tenant-based voucher program regulations also apply to the PBV program. Consequently, many of the HACB's policies related to tenant-based assistance also apply to RAD PBV assistance. The provisions of the tenant-based voucher regulations that do not apply to the PBV program are listed at 24 CFR 983.2.

#### HACB Policy

Except as otherwise noted in this chapter, or unless specifically prohibited by PBV program regulations, the HACB's policies for the tenant-based voucher program contained in this administrative plan also apply to the RAD PBV program and its participants. This chapter is intended to address requirements specific to the RAD PBV program only.

### **18-I.D. RELOCATION REQUIREMENTS [Notice PIH 2016-17]**

In some developments, in-place residents may need to be relocated as a result of properties undergoing repairs, being demolished and rebuilt, or when assistance is transferred from one site to another. RAD program rules prohibit the permanent, involuntary relocation of residents as a result of conversion. Residents that are temporarily relocated retain the right to return to the project once it has been completed.

Relocation assistance provided to residents will vary depending on the length of time relocation is required. Residents must be properly notified in advance of relocation requirements in accordance with RAD program rules and Uniform Relocation Act (URA) requirements. Sample informing notices are provided in Appendices 2–5 of Notice PIH 2014-17. A written relocation plan is required if the RAD conversion involves permanent relocation (including a move in connection with a transfer of assistance) or temporary relocation anticipated to last longer than a year. While the HACB is not required to have a written relocation plan for temporary relocation lasting one year or less, HUD strongly encourages HACB to prepare one. Appendix II of Notice PIH 2016-17 contains recommended contents for a relocation plan.

In addition, HACB must undertake a planning process that complies with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA), although not all relocations under RAD will trigger requirements under URA. URA statute and implementing regulations may be found at 49 CFR Part 24. The obligation due to relocating residents under RAD are broadened than URA relocation assistance and payments.

Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to either: a) a unit at the development once rehabilitation or construction is completed, provided the resident's household is not under-housed; or b) a unit in the development which provides the same major features as the resident's unit in the development prior to the implementation of the RAD conversion.

Where the transfer of assistance to a new site is warranted and approved, residents of the converting development will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete.



If the HACB's proposed plans for conversion would preclude a resident from returning to the development, the resident must be given an opportunity to comment and/or object to such plans. HACB must alter the project plans to accommodate the resident's right to return to the development if the resident would be precluded from returning to the development.

Examples of project plans that may preclude a resident from returning to the development include, but are not limited to:

- Changes in the development's bedroom distribution that decrease the size of the units, resulting in the resident being under-housed;
- The resident cannot be accommodated in the remaining assisted units due to a reduction in the number of assisted units at the development;
- Income limit eligibility requirements associated with the LIHTC program or another program; and
- Failure to provide a reasonable accommodation, in violation of applicable law, where reasonable accommodation may include installation of accessibility features that are needed by the resident.

Residents of a development undergoing conversion that would be precluded from returning to the development may voluntarily accept a HACB or owner's offer to permanently relocate to alternative housing, and thereby waive their right to return to the development after rehabilitation or construction is completed. In this event, the HACB must secure the resident's written consent to a voluntary permanent relocation in lieu of returning to the development. HACB is prohibited from employing any tactics to pressure residents into relinquishing their right to return or accepting other housing options. Additionally, a HACB may not terminate a resident's lease if the HACB fails to obtain the resident's consent and the resident seeks to exercise the right to return.

In the case of multi-phase RAD transactions, the resident has a right to return to the development or to other converted phases of the development that are available for occupancy at the time the resident is eligible to exercise their right of return. Generally, the resident's right to return must be accommodated within the development associated with the resident's original unit, however, the HACB may treat multiple converted developments on the same site as one for purposes of right to return. Should the HACB seek the resident exercise the right to return at a future phase, the HACB must secure the resident's consent in writing.

Alternative housing options may involve a variety of housing options, including but not limited to:

- Transfers to public housing
- Admission to other affordable housing properties subject to the applicable program rules
- Housing choice voucher (HCV) assistance
- Homeownership programs subject to the applicable program rules
- Other options identified by the HACB

**18-I.E. EQUAL OPPORTUNITY REQUIREMENTS [24 CFR 983.8; Notice PIH 2012-32, REV-3]**

RAD conversions are governed by the same civil rights authorities that govern HUD-assisted activities in general. HACB must comply with all applicable fair housing and civil rights laws, including but not limited to the Fair Housing Act, Title VI of the Civil Rights Act of 1964, and Section 504 of the Rehabilitation Act of 1973, when conducting relocation planning and providing relocation assistance. For example, persons with disabilities returning to the RAD project may not be turned away or placed on a waiting list due to a lack of accessible units. Their need for an accessible unit must be accommodated.



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**PART II: PBV PROJECT SELECTION****18-II.A. OVERVIEW**

Unlike in the standard PBV program where the HACB typically selects the property through an owner proposal selection process, projects selected for assistance under RAD PBV are selected in accordance with the provisions in Notice PIH 2012-32, REV-3. Therefore, 24 CFR 983.51 does not apply since HUD selects RAD properties through a competitive selection process.

**18-II.B. OWNERSHIP AND CONTROL [Notice PIH 2012-32, REV-3]**

Except where permitted to facilitate the use of low-income housing tax credits, during both the initial term and renewal terms of the HAP contract, ownership must be by a public or non-profit entity. The requirement for a public or non-profit entity is satisfied if a public or non-profit entity (or entities), directly or through a wholly-owned affiliate (1) holds a fee simple interest in the property; (2) is the lessor under a ground lease with the property owner; (3) has the direct or indirect legal authority to direct the financial and legal interest of the property owner with respect to the RAD units, (4) owns 51 percent or more of the general partner interests in a limited partnership or 51 percent or more of the managing member interests in a limited liability company with all powers of a general partner or managing member, as applicable; (5) owns a lesser percentage of the general partner or managing member interests and holds certain control rights as approved by HUD; (6) owns 51 percent or more of all ownership interests in a limited partnership or limited liability company and holds certain control rights as approved by HUD; or (7) other ownership and control arrangements approved by HUD.

If low-income housing tax credits will be used, HUD may allow ownership of the property to be transferred to a tax credit entity controlled by a for-profit entity if HUD determines that the HACB preserves its interest in the property. Preservation of HACB interest in the property includes but is not limited to the following:

- The HACB, or an affiliate under its sole control, is the general partner or managing member;
- The HACB retains fee ownership and leases the real estate to the tax credit entity pursuant to a long-term ground lease;
- The HACB retains control over leasing the property and determining program eligibility;
- The HACB enters into a control agreement by which the HACB retains consent rights over certain acts of the project owner and retains certain rights over the project;
- Other means that HUD finds acceptable

**18-II.C. HACB-OWNED UNITS [24 CFR 983.59; Notice PIH 2012-32, REV-3; FR Notice 1/18/17]**

If the project is HACB-owned, rent-setting and inspection functions set out in 24 CFR 983.59 must be conducted by an independent entity approved by HUD.

The independent entity that performs these program services may be the unit of general local government for the HACB jurisdiction (unless the HACB is itself the unit of general local government or an agency of such government), or another HUD-approved public or private independent entity.

The HACB may compensate the independent entity from HACB ongoing administrative fee income (including amounts credited to the administrative fee reserve). The HACB may not use other program receipts to compensate the independent entity for its services. The HACB, and the independent entity, may not charge the family any fee for the services provided by the independent entity.

**18-II.D. SUBSIDY LAYERING REQUIREMENTS [Notice PIH 2012-32, REV-3]**

In the case of a PHA that is converting all of its ACC units, there is no restriction on the amount of public housing funds that may be contributed to the covered project at closing; the PHA may convey all program funds to the covered projects. In order to cover the cost of administrative activities required to terminate the ACC, once it no longer has units under the ACC and has no plans to develop additional public housing, the PHA may:

- Designate that a reserve associated with the project be available to fund any public housing closeout costs (such as an operating deficit reserve or a specific PHA close-out reserve). Any funds not needed for public housing close-out costs would remain in such reserve or may be transferred to another reserve associated with the project (such as the replacement reserve). Thereafter, these funds may be used at the project pursuant to the authorized use of the applicable reserve; or
- Retain funds under the public housing program for this purpose. However, HUD will recapture any public housing funds that a PHA does not expend for closeout costs.

In the case where the PHA will continue to maintain other units in its inventory under a public housing ACC, a contribution of operating funds to the covered project that exceeds the average amount the project has held in operating reserves over the past three years will trigger a subsidy layering review under 24 CFR 4.13. Similarly, any contribution of capital funds, including Replacement Housing Factor (RHF) or Demolition Disposition Transitional Funding (DDTF), will trigger a subsidy layering review. Notwithstanding the subsidy layering review, PHAs should be mindful of how the capital funds or operating reserves used in the financing of its RAD properties may impact the physical and financial health of properties that will remain in its public housing inventory.

In addition, following execution of the HAP contract, PHAs are authorized to use operating and capital funds to make HAP payments for the remainder of the first calendar year in which the HAP contract is effective. Otherwise, a PHA may not contribute public housing program funds to the covered project unless such funding has been identified in the approved financing plan and included in the approved “sources and uses” attached to the RCC.



**18-II.E. PBV PERCENTAGE LIMITATION [Notice PIH 2012-32, REV-3]**

Covered projects do not count against the maximum amount of assistance a PHA may utilize for the PBV program, which under the standard PBV program is set at 20 percent of the authorized units allocated to a PHA under the HCV program. To implement this provision, HUD is waiving section 8(o)(13)(B) of the 1937 Act as well as 24 CFR 983.6.

There is no cap on the number of units that may receive PBV assistance in a project.

**18-II.F. SITE SELECTION STANDARDS [Notice PIH 2012-32, REV-3;  
Notice PIH 2016-17]**

Site selection requirements set forth in 24 CFR 983.57 apply to RAD PBV, with the exception of 983.57(b)(1) and (c)(2). HUD waives the provisions regarding deconcentration of poverty and expanding housing and economic opportunity for existing housing sites.

HUD will conduct a front-end civil rights review of the HACB's proposed site in certain circumstances. For RAD PBV conversions that involve new construction located in an area of minority concentration (whether on the existing public housing site or on a new site) HUD will determine whether it meets one of the exceptions that would allow for new construction in an area of minority concentration.

The HACB must ensure that its RAD PBV conversion, including any associated new construction, is consistent with its certification to affirmatively further fair housing and complies with civil rights laws.

**18-II.G. ENVIRONMENTAL REVIEW [Notice PIH 2012-32, REV-3]**

HUD cannot approve an applicant's financing plan submission unless and until the required environmental review has been completed for the applicant's proposed conversion project and found to meet environmental review requirements. Environmental documents must be submitted as part of the financing plan. HUD will not issue a RAD Conversion Commitment (RCC) if the project plan does not meet the environmental review requirements described in Attachment 1A of Notice PIH 2012-32, REV-3.

### **PART III: DWELLING UNITS**

#### **18-III.A. OVERVIEW**

This part identifies the special housing quality standards that apply to the RAD PBV program, housing accessibility for persons with disabilities, and special procedures for conducting housing quality standards inspections.

#### **18-III.B. HOUSING QUALITY STANDARDS [24 CFR 983.101]**

The housing quality standards (HQS) for the tenant-based program generally apply to the PBV program. HQS requirements for shared housing, manufactured home space rental, and the homeownership option do not apply because these housing types are not assisted under the PBV program.

The physical condition standards at 24 CFR 5.703 do not apply to the PBV program.

#### **Lead-based Paint [24 CFR 983.101(c)]**

The lead-based paint requirements for the tenant-based voucher program do not apply to the PBV program. Instead, The Lead-based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations at 24 CFR part 35, subparts A, B, H, and R, apply to the PBV program.

#### **18-III.C. HOUSING ACCESSIBILITY FOR PERSONS WITH DISABILITIES**

The housing must comply with program accessibility requirements of section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and implementing regulations at 24 CFR part 8. The HACB must ensure that the percentage of accessible dwelling units complies with the requirements of section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as implemented by HUD's regulations at 24 CFR 8, subpart C.

Housing first occupied after March 13, 1991, must comply with design and construction requirements of the Fair Housing Amendments Act of 1988 and implementing regulations at 24 CFR 100.205, as applicable. (24 CFR 983.102)



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**18-III.D. INSPECTING UNITS****Initial Inspection [Notice PIH 2012-32, REV-3]**

Under RAD, all units must meet HQS no later than the date of completion of the work as indicated in the RCC.

**Turnover Inspections [24 CFR 983.103(c)]**

Before providing assistance to a new family in a contract unit, the HACB must inspect the unit. The HACB may not provide assistance on behalf of the family until the unit fully complies with HQS.

**Annual/Biennial Inspections [24 CFR 983.103(d); FR Notice 6/25/14]**

At least once every 24 months during the term of the HAP contract, the HACB must inspect a random sample consisting of at least 20 percent of the contract units in each building, to determine if the contract units and the premises are maintained in accordance with HQS. Turnover inspections are not counted toward meeting this inspection requirement.

**HACB Policy**

The HACB will inspect on an annual basis a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS.

If more than 20 percent of the sample of inspected contract units in a building fail the initial inspection, the HACB must reinspect 100 percent of the contract units in the building.

**Other Inspections [24 CFR 983.103(e)]**

The HACB must inspect contract units whenever needed to determine that the contract units comply with HQS and that the owner is providing maintenance, utilities, and other services in accordance with the HAP contract. The HACB must take into account complaints and any other information coming to its attention in scheduling inspections.

The HACB must conduct follow-up inspections needed to determine if the owner (or, if applicable, the family) has corrected an HQS violation, and must conduct inspections to determine the basis for exercise of contractual and other remedies for owner or family violation of HQS.

In conducting HACB supervisory quality control HQS inspections, the HACB should include a representative sample of both tenant-based and project-based units.

**Inspecting HACB-Owned Units [24 CFR 983.103(f)]**

In the case of HACB-owned units, the inspections must be performed by an independent agency designated by the HACB and approved by HUD. The independent entity must furnish a copy of each inspection report to the HACB and to the HUD field office where the project is located. The HACB must take all necessary actions in response to inspection reports from the independent agency, including exercise of contractual remedies for violation of the HAP contract by the HACB-owner.

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**PART IV: HOUSING ASSISTANCE PAYMENTS (HAP) CONTRACT****18-IV.A. OVERVIEW**

Public housing projects converting under RAD do not employ the PBV Agreement to Enter into a Housing Assistance Payments (AHAP) contract. Instead, following the execution of all requirements contained in the Commitment to Enter into a HAP (CHAP) contract and the RAD Conversion Commitment (RCC), a project is converted immediately to the RAD PBV HAP contract following the closing of any construction financing. Owners of public housing projects converted to PBV assistance via RAD enter into a HAP contract with the HACB that will administer the PBV assistance. Units assisted under a RAD PBV HAP contract must be subject to long-term, renewable use and affordability restrictions.

**18-IV.B. HAP CONTRACT REQUIREMENTS****Contract Information [PBV Quick Reference Guide (10/14)]**

The RAD PBV program uses the PBV HAP contract for new construction or rehabilitated housing (Form HUD-52530A), as modified by the RAD rider (Form HUD-52621). The distinction between “existing housing” and “rehabilitated and newly constructed housing” is overridden by RAD requirements. The RAD rider must be attached to the PBV HAP contract and effectuates the conversion of public housing to PBV under RAD PBV. The project must also have an initial RAD use agreement. All public housing RAD conversion properties financed with LIHTC are also required to include an LIHTC rider.

**Execution and Effective date of the HAP Contract [RADBlast! 7/11/16]**

RAD PBV projects do not employ an Agreement to Enter into a Housing Assistance Payments (AHAP) contract like in the standard PBV program. Rather, when the conditions of the CHAP and the RCC are met and the conversion has closed, the HACB executes the HAP contract. Project owners may select the effective date of the HAP contract as the first day of either of the two months following the completed closing.

**Term of HAP Contract [Notice PIH 2012-32, REV-3]**

The initial term of the HAP contract may not be for less than 15 years and may be for a term of up to 20 years upon request of the owner and with approval of the administering voucher agency. Upon expiration of the initial term of the contract, and upon each renewal term of the contract, the owner must accept each offer to renew the contract, subject to the terms and conditions applicable at the time of each offer, and further subject to the availability of appropriations for each year of each such renewal. To implement this provision, HUD is waiving section 8(o)(13)(F) of The United States Housing Act of 1937, which established a maximum term of 15 years, as well as 24 CFR 983.205(a), which governs the contract term.

**Agreement to Enter into a HAP (AHAP) Contract [Notice PIH 2012-32, REV-3]**

For public housing conversions to PBV, there will be no agreement to enter into a Housing Assistance Payments (AHAP) contract. Therefore, all regulatory references to the Agreement (AHAP), including regulations under 24 CFR Part 983 Subpart D, are waived. The definitions for proposal selection date, new construction, rehabilitation, and existing housing are not applicable.



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**Mandatory Contract Renewal [Notice PIH 2012-32, REV-3]**

By statute, upon contract expiration, the agency administering the vouchers will offer, and the HACB will accept, renewal of the contract subject to the terms and conditions applicable at the time of renewal and the availability of appropriations each year for such renewal. Consequently 24 CFR 983.205(b), governing the HACB discretion to renew the contract for term of up to 15 years, will not apply.

In the event that the HAP contract is removed due to breach, non-compliance or insufficiency of appropriations, for all units previously covered under the HAP contract, new tenants must have incomes at or below 80 percent of the area median income at the time of admission and rents may not exceed 30 percent of 80 percent of median income for an appropriate size unit for the remainder of the term of the RAD use agreement.

**Remedies for HQS Violations [24 CFR 983.208(b)]**

The HACB may not make any HAP payment to the owner for a contract unit during any period in which the unit does not comply with HQS. If the HACB determines that a contract does not comply with HQS, the HACB may exercise any of its remedies under the HAP contract, for any or all the contract units. Available remedies include termination of housing assistance payments, abatement or reduction of housing assistance payments, reduction of contract units, and termination of the HAP contract.

HACB Policy

The HACB will abate and terminate PBV HAP contracts for noncompliance with HQS in accordance with the policies used in the tenant-based voucher program. These policies are contained in Section 8-II.G., Enforcing Owner Compliance.

**18-IV.C. AMENDMENTS TO THE HAP CONTRACT****Floating Units [Notice PIH 2012-32, REV-3]**

In certain mixed-finance projects, the HACB may ask HUD permission to have assistance float among units within the project that are the same bedroom size. The unit to which assistance is floated must be comparable to the unit being replaced in quality and amenities.

If the HACB chooses to float units, units are not specifically identified on the HAP contract, rather the HAP contract must specify the number and type of units in the property that are RAD PBV units, including any excepted units. The property must maintain the same number and type of RAD units from the time of the initial HAP contract execution forward.

**HACB Policy**

The HACB will not float assistance among unoccupied units within the project.

**Reduction in HAP Contract Units [Notice PIH 2012-32, REV-3]**

Project owners are required to make available for occupancy by eligible tenants the number of assisted units under the terms of the HAP contract.

The HACB may not reduce the number of assisted units without HUD approval. Any HUD approval of a HACB's request to reduce the number of assisted units under contract is subject to conditions that HUD may impose. MTW agencies may not alter this requirement.

If units are removed from the HAP contract because a new admission's TTP comes to equal or exceed the gross rent for the unit and if the project is fully assisted, the HACB must reinstate the unit after the family has vacated the property. If the project is partially assisted, the HACB may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR 983.207, or where "floating" units have been permitted.

**18-IV.D. HAP CONTRACT YEAR AND ANNIVERSARY DATES [24 CFR 983.302(e)]**

The HAP contract year is the period of 12 calendar months preceding each annual anniversary of the HAP contract during the HAP contract term. The initial contract year is calculated from the first day of the first calendar month of the HAP contract term.

The annual anniversary of the HAP contract is the first day of the first calendar month after the end of the preceding contract year. There is a single annual anniversary date for all units under a HAP contract.



**18-IV.E. OWNER RESPONSIBILITIES UNDER THE HAP CONTRACT**  
**[24 CFR 983.210]**

When the owner executes the HAP contract, he or she always certifies that at such execution and during the term of the HAP contract:

- All contract units are in good condition and the owner is maintaining the premises and contract units in accordance with HQS;
- The owner is providing all services, maintenance, equipment, and utilities as agreed to under the HAP contract and the leases;
- Each contract unit for which the owner is receiving HAP is leased to an eligible family referred by the HACB, and the lease is in accordance with the HAP contract and HUD requirements;
- To the best of the owner's knowledge, the family resides in the contract unit for which the owner is receiving HAP, and the unit is the family's only residence;
- The owner (including a principal or other interested party) is not the spouse, parent, child, grandparent, grandchild, sister, or brother of any member of a family residing in a contract unit;
- The amount of the HAP the owner is receiving is correct under the HAP contract;
- The rent for contract units does not exceed rents charged by the owner for comparable unassisted units;
- Except for HAP and tenant rent, the owner has not received and will not receive any other payment or consideration for rental of the contract unit;
- The family does not own or have any interest in the contract unit (this does not apply to the family's membership in a cooperative); and
- Repair work on the project selected as an existing project that is performed after HAP contract execution within such post-execution period as specified by HUD may constitute development activity, and if determined to be development activity, the repair work undertaken shall follow Davis-Bacon wage requirements.

**18-IV.F. VACANCY PAYMENTS [24 CFR 983.352(b)]**

At the discretion of the HACB, the HAP contract may provide for vacancy payments to the owner for a HACB-determined period of vacancy extending from the beginning of the first calendar month after the move-out month for a period not exceeding two full months following the move-out month. The amount of the vacancy payment will be determined by the HACB and cannot exceed the monthly rent to owner under the assisted lease, minus any portion of the rental payment received by the owner, including amounts available from the tenant's security deposit.

**HACB Policy**

The HACB will provide vacancy payments to the owner. The HAP contract with the owner will contain the amount of the vacancy payment and the period for which the owner will qualify for these payments.

**PART V: SELECTION OF PBV PROGRAM PARTICIPANTS****18-V.A. OVERVIEW**

Many of the provisions of the tenant-based voucher regulations [24 CFR 982] also apply to the PBV program. This includes requirements related to determining eligibility and selecting applicants from the waiting list. Even with these similarities, there are requirements that are unique to the PBV program. This part describes the requirements and policies related to eligibility and admission to the PBV program.

**18-V.B. PROHIBITED RESCREENING OF EXISTING TENANTS UPON CONVERSION [Notice PIH 2012-32, REV-3]**

Current households cannot be excluded from occupancy at the covered project based on any rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. Post-conversion, the tenure of all residents of the covered project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified by Notice PIH 2012-32, REV-3 (e.g., rent phase-in provisions).

For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family. Existing residents at the time of conversion may not be rescreened for citizenship status or have their social security numbers reverified.

Further, to facilitate the right to return to the assisted property, this provision must apply to current public housing residents of the converting project that will reside in non-RAD PBV units placed in a project that contain RAD PBV units. Such families and such contract units will otherwise be subject to all requirements of the applicable program, specifically 24 CFR 983 for non-RAD PBV.

For the RAD PBV program, *in-place family* means a family who lived in a pre-conversion property at the time assistance was converted from public housing to PBV under RAD.



**18-V.C. ELIGIBILITY FOR PBV ASSISTANCE [24 CFR 983.251(a) and (b)]**

Applicants for PBV assistance must meet the same eligibility requirements as applicants for the tenant-based voucher program. Applicants must qualify as a family as defined by HUD and the HACB, have income at or below HUD-specified income limits, and qualify on the basis of citizenship or the eligible immigration status of family members [24 CFR 982.201(a) and 24 CFR 983.2(a)]. In addition, an applicant family must provide social security information for family members [24 CFR 5.216 and 5.218] and consent to the HACB's collection and use of family information regarding income, expenses, and family composition [24 CFR 5.230]. The HACB may also not approve a tenancy if the owner (including a principal or other interested party) of the unit is the parent, child, grandparent, grandchild, sister, or brother of any member of the family, unless needed as a reasonable accommodation. An applicant family must also meet HUD requirements related to current or past criminal activity.

**HACB Policy**

The HACB will determine an applicant family's eligibility for the RAD PBV program in accordance with the policies in Chapter 3.

**18-V.D. ORGANIZATION OF THE WAITING LIST [24 CFR 983.251(c);  
Notice PIH 2012-32, REV-3]**

The standard PBV regulations at 24 CFR 983.251 set out program requirements related to establishing and maintaining a voucher-wide, PBV program-wide, or site-based waiting list from which residents will be admitted. These provisions will apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies.

**HACB Policy.**

The HACB will establish and manage separate waiting lists for individual projects or buildings that are receiving RAD PBV assistance. The HACB currently has waiting lists for the following RAD PBV projects:

**PBV 4 Villa Del Sol**  
**PBV 5 Citrus Annex**  
**PBV 6 Las Brisas**  
**PBV 7 Linda Vista**  
**PBV 8 Scattered Sites**  
**PBV 9 Rose Gardens**  
**PBV10 Sunset Terrace**

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

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

The HACB will maintain the project-specific waiting list in accordance with all applicable civil rights and fair housing regulations found at 24 CFR 903.7(b)(2)(ii)-(iv). The HACB will provide applicants full information about each development, including an estimate of the wait time, location, occupancy, number and size of accessible units, and amenities like day care, security, transportation, and training programs at each development with a site-based waiting list. The system for selection will be consistent with all applicable civil rights and fair housing laws and regulations and may not conflict with any imposed or pending court order, settlement agreement, or complaint brought by HUD.

The HACB will assess any changes in racial, ethnic or disability-related tenant composition at each HACB site that may have occurred during the implementation of the site-based waiting list, based on confirmed and accurate PIC occupancy data. At least every three years, the HACB will use independent testers to assure that the site-based system is not being implemented in a discriminatory manner.



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**18-V.E. SELECTION FROM THE WAITING LIST [24 CFR 983.251(c)]**

After conversion to RAD PBV, applicants who will occupy units with RAD PBV assistance must be selected from the HACB's waiting list. The HACB may establish selection criteria or preferences for occupancy of PBV units.

**Income Targeting [24 CFR 983.251(c)(6); Notice PIH 2012-32, REV-3]**

At least 75 percent of the families admitted to the HACB's tenant-based and project-based voucher programs during the HACB fiscal year from the waiting list must be extremely-low income families. The income targeting requirement applies to the total of admissions to both programs.

Families in place at the time of the conversion are exempt from income targeting requirements. New admissions follow standard PBV requirements.

**Units with Accessibility Features [24 CFR 983.251(c)(7)]**

When selecting families to occupy PBV units that have special accessibility features for persons with disabilities, the HACB must first refer families who require such features to the owner.

**Preferences [24 CFR 983.251(d); FR Notice 11/24/08; Notice PIH 2012-32, REV-3]**

The HACB may use the same selection preferences that are used for the tenant-based voucher program, establish selection criteria or preferences for the PBV program, or for occupancy of PBV developments or units.

The HACB may establish a selection preference for families who qualify for voluntary services, including disability-specific services, offered in conjunction with assisted units, provided that preference is consistent with the HACB plan. The HACB may not, however, grant a preference to a person with a specific disability [FR Notice 1/18/17].

In advertising such a project, the owner may advertise the project as offering services for a disability; however, the project must be open to all otherwise eligible persons with disabilities who may benefit from services provided in the project. In these projects, residents with disabilities may not be required to accept the services offered as a condition of occupancy.

**HACB Policy**

The HACB will not offer any preferences for the RAD PBV program or for PBV projects or units.

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## **18-V.F. OFFER OF PBV ASSISTANCE**

### **Refusal of Offer [24 CFR 983.251(e)(3)]**

The HACB is prohibited from taking any of the following actions against a family who has applied for, received, or refused an offer of PBV assistance:

- Refusing to list the applicant on the waiting list for tenant-based voucher assistance
- Denying any admission preference for which the applicant qualifies
- Changing the applicant's place on the waiting list based on preference, date, and time of application, or other factors affecting selection under the HACB's selection policy
- Removing the applicant from the tenant-based voucher waiting list

### **Disapproval by Landlord [24 CFR 983.251(e)(2)]**

If a PBV owner rejects a family for admission to the owner's units, such rejection may not affect the family's position on the tenant-based voucher waiting list.

### **Acceptance of Offer [24 CFR 983.252]**

#### ***Family Briefing***

When a family accepts an offer for PBV assistance, the HACB must give the family an oral briefing. The briefing must include information on how the program works and the responsibilities of the family and owner. In addition to the oral briefing, the HACB must provide a briefing packet that explains how the HACB determines the total tenant payment for a family, the family obligations under the program, and applicable fair housing information.

#### ***Persons with Disabilities***

If an applicant family's head or spouse is disabled, the HACB must assure effective communication, in accordance with 24 CFR 8.6, in conducting the oral briefing and in providing the written information packet. This may include making alternative formats available (see Chapter 2). In addition, the HACB must have a mechanism for referring a family that includes a member with a mobility impairment to an appropriate accessible PBV unit.

#### ***Persons with Limited English Proficiency***

The HACB should take reasonable steps to assure meaningful access by persons with limited English proficiency in accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166 (see Chapter 2).



**18-V.G. OWNER SELECTION OF TENANTS**

The owner is responsible for developing written tenant selection procedures that are consistent with the purpose of improving housing opportunities for very low-income families and reasonably related to program eligibility and an applicant's ability to fulfill their obligations under the lease. An owner must promptly notify in writing any rejected applicant of the grounds for any rejection [24 CFR 983.253(a)(2) and (a)(3)].

**Leasing [24 CFR 983.253(a)]**

During the term of the HAP contract, the owner must lease contract units to eligible families that are selected and referred by the HACB from the HACB's waiting list. The contract unit leased to the family must be the appropriate size unit for the size of the family, based on the HACB's subsidy standards.

**Filling Vacancies [24 CFR 983.254(a)]**

The owner must promptly notify the HACB of any vacancy or expected vacancy in a contract unit. After receiving such notice, the HACB must make every reasonable effort to promptly refer a sufficient number of families for the owner to fill such vacancies. The HACB and the owner must make reasonable efforts to minimize the likelihood and length of any vacancy.

**HACB Policy**

The owner must notify the HACB in writing (mail, fax, or e-mail) within five business days of learning about any vacancy or expected vacancy.

The HACB will make every reasonable effort to refer families to the owner within 10 business days of receiving such notice from the owner.

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## **18-V.H. TENANT SCREENING [24 CFR 983.255]**

### **HACB Responsibility**

The HACB is not responsible or liable to the owner or any other person for the family's behavior or suitability for tenancy. However, the HACB may opt to screen applicants for family behavior or suitability for tenancy and may deny applicants based on such screening.

#### HACB Policy

The HACB will not conduct screening to determine a PBV applicant family's suitability for tenancy.

The HACB must provide the owner with an applicant family's current and prior address (as shown in HACB records) and the name and address (if known by the HACB) of the family's current landlord and any prior landlords.

In addition, the HACB may offer the owner other information the HACB may have about a family, including information about the tenancy history of family members or about drug trafficking and criminal activity by family members. The HACB must provide applicant families a description of the HACB policy on providing information to owners, and the HACB must give the same types of information to all owners.

The HACB may not disclose to the owner any confidential information provided in response to a request for documentation of domestic violence, dating violence, sexual assault, or stalking, except at the written request or with the written consent of the individual providing the documentation [24 CFR 5.2007(c)].

#### HACB Policy

The HACB will inform owners of their responsibility to screen prospective tenants and will provide owners with the required known name and address information, at the time of the turnover HQS inspection or before. The HACB will not provide any additional information to the owner, such as tenancy history, criminal history, etc.

### **Owner Responsibility**

The owner is responsible for screening and selection of the family to occupy the owner's unit. When screening families the owner may consider a family's background with respect to the following factors:

- Payment of rent and utility bills
- Caring for a unit and premises
- Respecting the rights of other residents to the peaceful enjoyment of their housing
- Drug-related criminal activity or other criminal activity that is a threat to the health, safety, or property of others
- Compliance with other essential conditions of tenancy



## **PART VI: OCCUPANCY**

### **18-VI.A. OVERVIEW**

After an applicant has been selected from the waiting list, determined eligible by the HACB, referred to an owner, and determined suitable by the owner, the family will sign the lease and occupancy of the unit will begin.

### **18-VI.B. LEASE [24 CFR 983.256; Notice PIH 2012-32, REV-3]**

The tenant must have legal capacity to enter a lease under state and local law. *Legal capacity* means that the tenant is bound by the terms of the lease and may enforce the terms of the lease against the owner.

The tenant and the owner must enter into a written lease agreement that is signed by both parties. The tenancy addendum must include, word-for-word, all provisions required by HUD.

### **Lease Requirements [24 CFR 983.256(c); Notice PIH 2012-32, REV-3]**

The lease for a PBV unit must specify all the following information:

- The names of the owner and the tenant;
- The unit rented (address, apartment number, if any, and any other information needed to identify the leased contract unit);
- The term of the lease (initial term and any provision for renewal);
- The amount of the tenant rent to owner, which is subject to change during the term of the lease in accordance with HUD requirements;
- A specification of the services, maintenance, equipment, and utilities that will be provided by the owner; and
- The amount of any charges for food, furniture, or supportive services.

The HACB must include resident procedural rights for termination notification and grievance procedures in the owner's lease. These requirements are not part of the regular PBV program but are required under RAD. An example of language that may be included can be found in Attachment-1E of Notice PIH 2012-32, REV-2.

### **Tenancy Addendum [24 CFR 983.256(d)]**

The tenancy addendum in the lease must state:

- The program tenancy requirements
- The composition of the household as approved by the HACB (the names of family members and any HACB-approved live-in aide)

All provisions in the HUD-required tenancy addendum must be included in the lease. The terms of the tenancy addendum prevail over other provisions of the lease.

**Initial Term and Lease Renewal [24 CFR 983.256(f); PBV Quick Reference Guide (10/14)]**

Leases for residents who will remain in place (i.e., who will not be relocated solely as a result of conversion) must have an effective date that coincides with—and must be signed on or before—the effective date of the RAD PBV HAP contract.

The initial lease term must be for at least one year. The lease must provide for automatic renewal after the initial term of the lease in either successive definitive terms (e.g., month-to-month or year-to-year) or an automatic indefinite extension of the lease term. For automatic indefinite extension of the lease term, the lease terminates if any of the following occur:

- The owner terminates the lease for good cause
- The tenant terminates the lease
- The owner and tenant agree to terminate the lease
- The HACB terminates the HAP contract
- The HACB terminates assistance for the family

**Changes in the Lease [24 CFR 983.256(e)]**

If the tenant and owner agree to any change in the lease, the change must be in writing, and the owner must immediately give the HACB a copy of all changes.

The owner must notify the HACB in advance of any proposed change in the lease regarding the allocation of tenant and owner responsibilities for utilities. Such changes may only be made if approved by the HACB and in accordance with the terms of the lease relating to its amendment.

The HACB must redetermine reasonable rent, in accordance with program requirements, based on any change in the allocation of the responsibility for utilities between the owner and the tenant. The redetermined reasonable rent will be used in calculation of the rent to owner from the effective date of the change.



**Owner Termination of Tenancy [24 CFR 983.257; Notice PIH 2012-32, REV-3]**

With two exceptions, the owner of a PBV unit may terminate tenancy for the same reasons an owner may in the tenant-based voucher program (see Section 12-III.B. and 24 CFR 982.310). In the PBV program, terminating tenancy for “good cause” does not include doing so for a business or economic reason, or a desire to use the unit for personal or family use or other non-residential purpose.

Projects converting from public housing to PBV under RAD have additional procedural rights that do not apply to the standard PBV program. These procedural rights must be included in the owner’s lease as well as the HACB’s administrative plan. In addition to the regulations at 24 CFR 983.257 related to project owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that the HACB provides adequate written notice of termination of the lease which may not be less than:

- A reasonable period, but not to exceed 30 days:
  - If the health or safety of other tenants, HACB employees, or persons residing in the immediate vicinity of the premises is threatened; or
  - In the event of any drug-related or violent criminal activity or any felony conviction
- 14 days in the case of nonpayment of rent
- 30 days in any other case, except that if a state or local law provides for a shorter period, such shorter period will apply

Unlike in the standard PBV program, residents in converted projects have the right to request an informal hearing for issues that adversely affect the resident’s rights, obligations, welfare, or status with both the HACB and the project owner. See Chapter 16 Part III: Informal Reviews and Hearings for more information.

***Tenant Absence from the Unit [24 CFR 983.256(g) and 982.312(a)]***

The lease may specify a maximum period of family absence from the unit that may be shorter than the maximum period permitted by HACB policy. According to program requirements, the family’s assistance must be terminated if they are absent from the unit for more than 180 consecutive days. HACB termination of assistance actions due to family absence from the unit are subject to 24 CFR 982.312, except that the unit is not terminated from the HAP contract if the family is absent for longer than the maximum period permitted.

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**Continuation of Housing Assistance Payments [24 CFR 983.258;  
Notice PIH 2012-32, REV-3]**

Current residents living in the property prior to conversion are placed on and remain under the HAP contract when TTP equals or exceeds gross rent. In this case, until the family's TTP falls below the gross rent, the family will pay the owner the lesser of their TTP minus the utility allowance or any applicable maximum rent under the LIHTC program. The family will continue to pay this amount until/if circumstances changes, and HAP is paid on their behalf. In other words, assistance may subsequently be reinstated if the tenant becomes eligible for assistance. In such cases, the resident is still considered a program participant. All the family obligations and protections under RAD and standard PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP contract.

Following conversion, 24 CFR 983.53(d) applies, and any new families referred to the RAD PBV project must be initially eligible for a HAP payment at admission to the program. Further, for any new families admitted after the conversion, assistance will be terminated 180 days after the last housing assistance payment on their behalf. The cessation of housing assistance payments does not affect the family's other rights under its lease, nor does it preclude the resumption of payments as a result of later changes in income, rents, or other relevant circumstances if such changes occur within the 180 days window. If a family's assistance is terminated as a result of their zero HAP status, the HACB must remove the unit from the HAP contract. If the project is fully assisted, the HACB must reinstate the unit after the family has vacated the property. If the project is partially assisted, the HACB may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR 983.207.

#### HACB Policy

If a participating family who was admitted after the RAD conversion receive zero assistance and subsequently experiences a change in circumstances that would result in a HAP payment to the owner, the family must notify the HACB of the change and request an interim reexamination before the expiration of the 180-day period.



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**Security Deposits [24 CFR 983.259; PBV Quick Reference Guide (10/14)]**

Owners are permitted to recognize security deposit amounts that have been previously provided by tenants who are in-place at the time of the RAD conversion. Otherwise the security deposit requirements for standard PBV apply.

The owner may collect a security deposit from the tenant. The HACB may prohibit security deposits in excess of private market practice, or in excess of amounts charged by the owner to unassisted tenants.

HACB Policy

The HACB will allow the owner to collect a security deposit amount the owner determines is appropriate.

When the tenant moves out of a contract unit, the owner, subject to state and local law, may use the security deposit, including any interest on the deposit, in accordance with the lease, as reimbursement for any unpaid tenant rent, damages to the unit, or other amounts owed by the tenant under the lease.

The owner must give the tenant a written list of all items charged against the security deposit and the amount of each item. After deducting the amount used to reimburse the owner, the owner must promptly refund the full amount of the balance to the tenant.

If the security deposit does not cover the amount owed by the tenant under the lease, the owner may seek to collect the balance from the tenant. The HACB has no liability or responsibility for payment of any amount owed by the family to the owner.

**18-VI.C. PUBLIC HOUSING FSS AND ROSS PARTICIPANTS [Notice PIH 2012-32, REV-3]**

Current PH FSS participants will continue to be eligible for FSS once their housing is converted under RAD, and HACB will be allowed to use any PH FSS funds granted previously or pursuant to the current fiscal year (FY) PH FSS notice of funding availability (NOFA), to serve those FSS participants who live in units converted to RAD and who will as a result be moving to the HCV FSS program. The HACB must convert the PH FSS program participants at the covered project to their HCV FSS program.

Residents who were converted from the PH FSS program to the HCV FSS program through RAD may not be terminated from the HCV FSS program or have HCV assistance withheld due to the participant's failure to comply with the contract of participation. Consequently, 24 CFR 984.303(b)(5)(iii) does not apply to FSS participants in converted properties.

At the completion of the FSS grant, HACB should follow the normal closeout procedures outlined in the grant agreement. If the HACB continues to run an FSS program that serves PH and/or HCV participants, the HACB will continue to be eligible (subject to NOFA requirements) to apply for FSS funding and may use that funding to serve PH, HCV, and PBRA participants in its FSS program.

Current Resident Opportunities and Self-Sufficiency–Service Coordinators (ROSS–SC) program grantees will be able to finish out their current ROSS–SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future public housing ROSS–SC grants.

At the completion of the ROSS-SC grant, HACB should follow the normal closeout procedures outlined in the grant agreement. Please note that ROSS-SC grantees may be a non-profit or local resident association and this consequence of a RAD conversion may impact those entities.

**18-VI.D. RESIDENT PARTICIPATION AND FUNDING [Notice PIH 2012-32, REV-3]**

Residents of covered projects converting assistance to PBVs will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.



**18-VI.E. MOVES****Overcrowded, Under-Occupied, and Accessible Units [24 CFR 983.260;  
Notice PIH 2012-32, REV-3]**

All in-place tenants at the time of conversion are eligible to remain in the project. Over-housed families should be moved into appropriately sized units if such units are available in the new or rehabbed project. If appropriately sized units are not available, the existing tenants may continue to be over-housed until an appropriately sized unit becomes available or until the tenant leaves the project. Once the unit turns over, it must be leased to an appropriately sized family.

Following conversion, the standard PBV regulations apply. If the HACB determines that a family is occupying a wrong-size unit, based on the HACB's subsidy standards, or a unit with accessibility features that the family does not require, and the unit is needed by a family that does require the features, the HACB must promptly notify the family and the owner of this determination, and the HACB must offer the family the opportunity to receive continued housing assistance in another unit.

HACB Policy

The HACB will notify the family and the owner of the family's need to move based on the occupancy of a wrong-size or accessible unit within 10 business days of the HACB's determination. The HACB will offer the family the following types of continued assistance in the following order, based on the availability of assistance:

- PBV assistance in the same building or project
- PBV assistance in another project
- Tenant-based voucher assistance

If the HACB offers the family a tenant-based voucher, the HACB must terminate the housing assistance payments for a wrong-size or accessible unit at the earlier of the expiration of the term of the family's voucher, including any extension granted by the HACB, or the date upon which the family vacates the unit. If the family does not move out of the wrong-size unit or accessible unit by the expiration of the term of the family's voucher, the HACB must remove the unit from the HAP contract.

If the HACB offers the family another form of assistance that is not a tenant-based voucher, and the family does not accept the offer, does not move out of the PBV unit within a reasonable time as determined by the HACB, or both, the HACB must terminate the housing assistance payments for the unit at the expiration of a reasonable period as determined by the HACB and remove the unit from the HAP contract.

HACB Policy

When the HACB offers a family another form of assistance that is not a tenant-based voucher, the family will be given 30 days from the date of the offer to accept the offer and move out of the PBV unit. If the family does not move out within this 30-day time frame, the HACB will terminate the housing assistance payments at the expiration of this 30-day period.

The HACB may make exceptions to this 30-day period if needed for reasons beyond the family's control such as death, serious illness, or other medical emergency of a family member.

**Family Right to Move [24 CFR 983.261]**

The family may terminate the lease at any time after the first year of occupancy. The family must give advance written notice to the owner in accordance with the lease and provide a copy of such notice to the HACB.

**Choice Mobility [Notice PIH 2012-32, REV-3]**

If the family wishes to move with continued tenant-based assistance, the family must contact the HACB to request the rental assistance prior to providing notice to terminate the lease. If the family terminates the lease in accordance with lease requirements, the HACB is required to offer the family the opportunity for continued tenant-based assistance, in the form of a voucher or other comparable tenant-based rental assistance. If a voucher or other comparable tenant-based assistance is not immediately available, the HACB must give the family priority to receive the next available opportunity for continued tenant-based assistance.

If the family terminates the assisted lease before the end of the first year, the family relinquishes the opportunity for continued tenant-based assistance.

HACB Policy:

Prior to providing notice to the owner to terminate the lease, the family may submit a written request to the HACB for a choice mobility voucher at any time after completing the 12-month occupancy requirement.

The family will remain eligible to request a choice mobility voucher as long as they continue living at the same covered project. If a family moves from one covered project to another covered project prior to completing their 12-month occupancy requirement, their 12-month clock will reset. The family must wait 12 months from the date of move at the new property before they may request another choice mobility voucher. If a family transfers to a different unit within the same covered project, the 12-month clock does not reset.

The HACB will maintain a combined, agency-wide waiting list for all standard PBV and RAD PBV families wishing to exercise mobility after one year of tenancy. This list will be maintained separately from the tenant-based HCV list. Families on the choice mobility waiting list will be given priority over families on the tenant-based waiting list. The choice mobility waiting list will be organized by date and time of the family's written request to exercise choice mobility. The list will also identify whether families live in standard or RAD PBV units.



**Turnover Cap**

If as a result of RAD, the total number of PBV units (including RAD PBV units) administered by the HACB exceeds 20 percent of the HACB's authorized units under its HCV ACC with HUD, the HACB may establish a turnover cap. The HACB is not required to provide more than three-quarters of its turnover vouchers in any single year to the residents of covered projects. If the HACB chooses to establish a turnover cap and the cap is implemented, the HACB must create and maintain a waiting list in the order requests from eligible households were received.

HACB Policy

As a result of RAD, the total number of PBV units (including RAD PBV units) administered by the HACB exceeds 20 percent of the HACB's authorized units under its HCV ACC with HUD. Therefore, the HACB will establish a choice mobility cap. The HACB will not provide more than three-quarters of its turnover vouchers in a single year to residents of covered projects.

Families who requested a choice mobility voucher and are denied due to the cap will be given priority the following year when choice mobility vouchers are again issued since the choice mobility list will be organized by the date and time of the family's request.

**Emergency Transfers under VAWA [Notice PIH 2017-08]**

Except where special consideration is needed for the project-based voucher program, the HACB will follow VAWA policies as outlined in Chapter 16 Part IX of this administrative plan, including using the Emergency Transfer Plan as the basis for PBV transfers under VAWA (Exhibit 16-4).

HUD requires that the HACB include policies that address when a victim has been living in a unit for less than a year or when a victim seeks to move sooner than a tenant-based voucher is available.

**HACB Policy**

When the victim of domestic violence, dating violence, sexual assault, or stalking has lived in the unit for less than one year, the HACB will provide several options for continued assistance.

The HACB will first try to transfer the participant to another PBV unit in the same development or transfer to a different development where the HACB has PBV units. The HACB will expedite the administrative processes in this case in an effort to conduct the transfer as quickly as possible.

If no units are available for an internal transfer or if there is reasonable cause to believe that such a transfer would put the victim in jeopardy, the participant may receive continued assistance through an external transfer to either tenant-based rental assistance (HCV) or assistance in the HACB's public housing program. Such a decision will be made by the HACB based on the availability of tenant-based vouchers and/or vacancies in public housing units. Such families must be selected from the waiting list for the applicable program. The HACB has adopted a waiting list preference for victims of domestic violence, dating violence, sexual assault, and stalking in both its HCV and public housing programs in order to expedite this process. See Section 4-III.C. of this administrative plan.

If a victim wishes to move after a year of occupancy in the unit, but no tenant-based vouchers are available, the HACB will offer the participant an internal transfer to another PBV unit in the same development or a transfer to a different development where the HACB has PBV units. The HACB will expedite the administrative processes in this case in an effort to conduct the transfer as quickly as possible.

If no units are available for an internal transfer, or if there is reasonable cause to believe that such a transfer would put the victim in jeopardy, the participant may receive continued assistance through an external transfer to the HACB's public housing program. The HACB has adopted a waiting list preference for victims of domestic violence, dating violence, sexual assault, and stalking as part of the public housing ACOP in order to expedite this process.

**18-VI.F. REEXAMINATIONS [PBV Quick Reference Guide (10/14)]**

A family living in a unit converted from public housing to RAD PBV may retain its certification date. Unless a family's annual reexamination is due at the same time as the effective date of the RAD PBV HAP contract, the HACB does not need to recertify tenants at the point of conversion. For each family residing in a unit undergoing conversion of assistance under RAD, the administering HACB will have to submit a form HUD-50058 reflecting the family's admission to the voucher program. The effective date of the new admission will be the same as the effective date of the RAD PBV HAP contract. The form should include the same information previously found on the public housing form 50058, including the next annual reexamination date.

**18-VI.G. EARNED INCOME DISALLOWANCE [Notice PIH 2012-32, REV-3]**

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

Under the HCV program, the EID exclusion is limited to only persons with disabilities [24 CFR 5.617(b)]. In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to only persons with disabilities is waived. The waiver and resulting alternative requirement only apply to tenants receiving the EID at the time of conversion. No other tenant, such as tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion (e.g., due to loss of employment), tenants that move into the property following conversion, etc., is covered by this waiver.

**18-VI.H. RESIDENTS' PROCEDURAL RIGHTS [Notice PIH 2012-32, REV-3]**

HUD is incorporating additional termination notification requirements for public housing projects that convert assistance under RAD to PBV beyond those for the standard PBV program. In addition to the regulations at 24 CFR 983.257 related to owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV require that HACB provides adequate written notice of termination of the lease, which is no less than:

- A reasonable period, but not to exceed 30 days:
  - If the health or safety of other tenants, project owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
  - In the event of any drug-related or violent criminal activity or any felony conviction.
- Not less than 14 days in the case of nonpayment of rent
- Not less than 30 days in any other case, except that if a state or local law provides for a shorter period, such shorter period will apply



**18-VI.I. INFORMAL REVIEWS AND HEARINGS [Notice PIH 2012-32, REV-3]**

Unlike in the standard PBV program, residents in converted projects have the right to request an informal hearing for issues that adversely affect the resident's rights, obligations, welfare, or status with both the HACB and the project owner.

In addition to reasons for an informal hearing listed at 24 CFR 982.555(a)(1)(i)–(vi) (See 16-III.C. Informal Hearings for Participants), an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to an owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.

- For any hearing required under 24 CFR 982.555(a)(1)(i)–(vi), the contract administrator will perform the hearing, as is the current standard in the program.
- For any additional hearings required under RAD, the HACB (as owner) will perform the hearing.

An informal hearing will not be required for class grievances or for disputes between residents not involving the HACB (as owner) or contract administrator. This hearing requirement does not apply to and is not intended as a forum for initiating or negotiating policy changes between a group or groups of residents and the HACB (as owner) or contract administrator.

The HACB (as owner) must give residents notice of their ability to request an informal hearing as outlined in 24 CFR 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR 982.555(a)(1)(i)–(vi). (See Chapter 16)

The HACB (as owner) must provide an opportunity for an informal hearing before an eviction.

**PART VII: DETERMINING CONTRACT RENT****18-VII.A. INITIAL CONTRACT RENTS [Notice PIH 2012-32, REV-3]**

RAD conversions are intended to be cost-neutral, and therefore, should not exceed current public housing funding as adjusted for unit size. Since public housing units do not currently have contract rents, HUD provides an estimate of current contract rents for each HACB's public housing units based on current funding as adjusted by bedroom size. Current funding includes operating subsidy, tenant rents, capital funds, replacement housing factor funds (RHF), and demolition disposition transitional funding (DDTF). The funding may limit the amount of initial rent for a property. A detailed explanation of the determination of current funding may be found in Attachment 1C of Notice PIH 2012-32, REV-2. Once the current funding amount is calculated, the amount is adjusted by bedroom size to determine the current funding rent. HUD uses the same bedroom adjustment factors as in the metropolitan FMR schedules where the project is located.

HACB may adjust subsidy (and contract rents) across multiple projects as long as the HACB does not exceed the aggregate subsidy for all of the projects the HACB has submitted for conversion under RAD. This use, which HUD refers to as "bundled" rents, is permissible when a HACB submits applications for two or more projects. There is no limit to the number of projects that a HACB may bundle.

Notwithstanding the current funding level, the initial rents are set at the lower of:

- 110 percent of the fair market rent (FMR) or the HACB's exception payment standard approved by HUD, or the alternate rent cap in a HACB's MTW agreement
- Reasonable rent in comparison to the unassisted housing market
- An amount determined by current funding
  - Adjusted through rent bundling or reconfiguration of units

**18-VII.B. ADJUSTING CONTRACT RENTS [Notice PIH 2012-32, REV-3;  
PBV Quick Reference Guide (10/14)]**

Contract rents will be adjusted annually by HUD's operating cost adjustment factor (OCAF) at each anniversary of the HAP contract, subject to the availability of appropriations for each year of the contract term. As such, section 8(o)(13)(I) of the 1937 Act, and 24 CFR 983.301 and 983.302, concerning rent determinations, do not apply when adjusting rents. The rent to owner may at no time exceed the reasonable rent charged for comparable unassisted units in the private market, as determined by the contract administrator in accordance with 24 CFR 983.303.

Contract rents may not exceed the reasonable rent, with the exception that the contract rent for each unit may not be reduced below the initial contract rent under the initial HAP contract. However, the rent to owner may fall below the initial contract rent in the following situations:

- To correct errors in calculations in accordance with HUD requirements
- If additional housing assistance has been combined with PBV assistance after the execution of the initial HAP contract and a rent decrease is required pursuant to 983.55 (prohibition of excess public assistance)
- If a decrease in rent to owner is required based on changes in the allocation of responsibility for utilities between the owner and the tenant

The contract rent adjustment will be the lesser of:

- The current contract rent increased by the operating cost adjustment factor (OCAF), which is published annually in the *Federal Register*; or
- The reasonable rent

The administering HACB (or independent entity, if the project is HACB-owned) is responsible for processing rent adjustments, at each contract anniversary date, in accordance with the prevailing OCAF.

At least 120 days before the contract anniversary date, HUD recommends that the owner submit the OCAF rent adjustment worksheet (Form HUD-9625) to the HACB administering the PBV assistance (or the independent entity). The HACB will validate the data on the form and determine whether the rent exceeds the reasonable rent charged for comparable unassisted units in the private market, in accordance with 24 CFR 983.303. If rents would be unreasonable following application of the requested OCAF, then the rent can only be increased up to the reasonable rent. The approved rent adjustment will go into effect and the new rents to owner will take effect on the date of the contract anniversary.

**Rent Decrease**

Rents must not be reduced below the initial rent except to correct errors, for additional subsidy to the property, or to realign utility responsibilities.



**18-VII.C. UTILITY ALLOWANCES [Notice PIH 2012-32, REV-3;  
PBV Quick Reference Guide (10/14)]**

When contract rent amounts are set initially, the amount does not include a utility allowance. In general, the utility allowances that are used on the initial HAP contract at closing are the public housing utility allowances that are in effect prior to conversion. The CHAP must be updated prior to conversion to reflect current public housing utility allowances. At its discretion, the HACB may use the FMRs and utility allowances in effect during the 30-day period immediately before the beginning date of the HAP contract. The HACB may request a waiver from HUD to establish a site-specific utility allowance schedule.

After conversion, unless a waiver is requested and approved by HUD, the HACB must maintain a utility allowance schedule for tenant-paid utilities in accordance with standard PBV and HCV utility allowance regulations at 24 CFR 983.301(f)(2)(ii) and 24 CFR 982.517 respectively. These utility allowances are effective for in-place families at recertification.

**HACB Policy**

The HACB will use the HCV utility allowance schedule for the RAD developments.

**18-VII.D. REASONABLE RENT [24 CFR 983.303]**

At the time the initial rent is established and all times during the term of the HAP contract, the rent to owner for a contract unit may not exceed the reasonable rent for the unit as determined by the HACB, except rents must not be reduced below the initial rent except to correct errors, for additional subsidy to the property, or to realign utility responsibilities.

**How to Determine Reasonable Rent**

The reasonable rent of a unit receiving PBV assistance must be determined by comparison to rent for other comparable unassisted units. When making this determination, the HACB must consider factors that affect market rent. Such factors include the location, quality, size, type and age of the unit, as well as the amenities, housing services maintenance, and utilities to be provided by the owner.

***Comparability Analysis***

For each unit, the comparability analysis must use at least three comparable units in the private unassisted market. This may include units in the premises or project that is receiving project-based assistance. The analysis must show how the reasonable rent was determined, including major differences between the contract units and comparable unassisted units, and must be retained by the HACB. The comparability analysis may be performed by HACB staff or by another qualified person or entity. Those who conduct these analyses or are involved in determining the housing assistance payment based on the analyses may not have any direct or indirect interest in the property.

**HACB-Owned Units**

For HACB-owned units, the amount of the reasonable rent must be determined by an independent agency approved by HUD in accordance with PBV program requirements. The independent entity must provide a copy of the determination of reasonable rent for HACB-owned units to the HACB and to the HUD field office where the project is located.

## **PART VIII: PAYMENTS TO OWNER**

### **18-VIII.A. HOUSING ASSISTANCE PAYMENTS**

During the term of the HAP contract, the HACB must make housing assistance payments to the owner in accordance with the terms of the HAP contract. During the term of the HAP contract, payments must be made for each month that a contract unit complies with HQS and is leased to and occupied by an eligible family. The housing assistance payment must be paid to the owner on or about the first day of the month for which payment is due, unless the owner and the HACB agree on a later date.

Except for discretionary vacancy payments, the HACB may not make any housing assistance payment to the owner for any month after the month when the family moves out of the unit (even if household goods or property are left in the unit).

The amount of the housing assistance payment by the HACB is the rent to owner minus the tenant rent (total tenant payment minus the utility allowance).

In order to receive housing assistance payments, the owner must comply with all provisions of the HAP contract. Unless the owner complies with all provisions of the HAP contract, the owner does not have a right to receive housing assistance payments.



**18-VIII.B. VACANCY PAYMENTS [24 CFR 983.352]**

If an assisted family moves out of the unit, the owner may keep the housing assistance payment for the calendar month when the family moves out. However, the owner may not keep the payment if the HACB determines that the vacancy is the owner's fault.

HACB Policy

If the HACB determines that the owner is responsible for a vacancy and as a result is not entitled to keep the housing assistance payment, the HACB will notify the landlord of the amount of housing assistance payment that the owner must repay. The HACB will require the owner to repay the amount owed in accordance with the policies in Section 16-IV.B.

At the discretion of the HACB, the HAP contract may provide for vacancy payments to the owner. The HACB may only make vacancy payments if:

- The owner gives the HACB prompt, written notice certifying that the family has vacated the unit and identifies the date when the family moved out (to the best of the owner's knowledge);
- The owner certifies that the vacancy is not the fault of the owner and that the unit was vacant during the period for which payment is claimed;
- The owner certifies that it has taken every reasonable action to minimize the likelihood and length of vacancy; and
- The owner provides any additional information required and requested by the HACB to verify that the owner is entitled to the vacancy payment.

The owner must submit a request for vacancy payments in the form and manner required by the HACB and must provide any information or substantiation required by the HACB to determine the amount of any vacancy payment.

HACB Policy

If an owner's HAP contract calls for vacancy payments to be made, and the owner wishes to receive vacancy payments, the owner must have properly notified the HACB of the vacancy in accordance with the policy in Section 18-V.G. regarding filling vacancies.

In order for a vacancy payment request to be considered, it must be made within 10 business days of the end of the period for which the owner is requesting the vacancy payment. The request must include the required owner certifications and the HACB may require the owner to provide documentation to support the request. If the owner does not provide the information requested by the HACB within 10 business days of the HACB's request, no vacancy payments will be made.

**18-VIII.C. TENANT RENT TO OWNER [24 CFR 983.353]**

The tenant rent is the portion of the rent to owner paid by the family. The amount of tenant rent is determined by the HACB in accordance with HUD requirements. Any changes in the amount of tenant rent will be effective on the date stated in the HACB notice to the family and owner.

The family is responsible for paying the tenant rent (total tenant payment minus the utility allowance). The amount of the tenant rent determined by the HACB is the maximum amount the owner may charge the family for rental of a contract unit. The tenant rent covers all housing services, maintenance, equipment, and utilities to be provided by the owner. The owner may not demand or accept any rent payment from the tenant in excess of the tenant rent as determined by the HACB. The owner must immediately return any excess payment to the tenant.

**Tenant and HACB Responsibilities**

The family is not responsible for the portion of rent to owner that is covered by the housing assistance payment and the owner may not terminate the tenancy of an assisted family for nonpayment by the HACB.

Likewise, the HACB is responsible only for making the housing assistance payment to the owner in accordance with the HAP contract. The HACB is not responsible for paying tenant rent, or any other claim by the owner, including damage to the unit. The HACB may not use housing assistance payments or other program funds (including administrative fee reserves) to pay any part of the tenant rent or other claim by the owner.

**Utility Reimbursements**

If the amount of the utility allowance exceeds the total tenant payment, the HACB must pay the amount of such excess to the tenant as a reimbursement for tenant-paid utilities, and the tenant rent to the owner must be zero.

The HACB may pay the utility reimbursement directly to the family or to the utility supplier on behalf of the family. If the HACB chooses to pay the utility supplier directly, the HACB must notify the family of the amount paid to the utility supplier.

**HACB Policy**

The HACB will make utility reimbursements directly to the family.

**Attachment tx007h01**

**Housing Authority of the City of Brownsville**

**Progress Statements**



El Jardin, 2021/2023 9% HTC Award, 44 RAD Tax Credit Units-

The project is anticipated to reach substantial completion by the end of June 2025. It received the first certificate of occupancy in November 2024. HACB then executed the RAD HAP contract with EL Jardin, to be effective December 1, 2024. The families from Victoria Gardens Public Housing development are the ones first being offered the option to relocate to El Jardin. Regardless of their decision to relocate to El Jardin or another site, the families are being offered assistance with relocation costs and needs. The El Jardin is Housing Strategy Phase I of the International Southmost HUD Choice Neighborhood Plan. The Brownsville Housing Opportunity Corporation (BHOC) is the sole Developer and General Partner for this project. BHOC will have the Right of First Refusal at the end of the 15-year compliance period. Total development cost is approximately \$29.3 million dollars.

Avanti Legacy del Sol, 2023 9% HTC, 84 Tax Credit Units-

The Brownsville Housing Opportunity Corporation (BHOC), an affiliated non-profit owned by the Housing Authority of the City of Brownsville, is the General Partner for this project. BHOC will have the Right of First Refusal at the end of the 15-year compliance period. The project received a force majeure in November 2024 by TDHCA, therefore extending the placed in-service deadline to December 2026. Project closed on January 31, 2025, and construction began on February 3, 2025. The Developer for this project is affiliated with Madhouse Development. The total tax credits awarded were \$20 million dollars.

Buena Vida Supportive Housing, 2024 9% HTC, 50 RAD Tax Credit Units-

This is one of three tax credit projects awarded by TDHCA in the 2024 round. The name of the property is pending to be chosen. This is in partnership with Friendship of Women, a non-profit organization providing services to families who are victims of domestic violence. This project is part of the re-development of the former Buena Vida Public Housing site, which is the anchor of the Buena Vida HUD Choice Neighborhood Plan. It also is part of the Housing Strategy Phase II of said plan. HACB will utilize the Faircloth to RAD program with the 9% HTC program. Please note HACB received the NARR in February 2024 and submitted the development proposal in February 2025. The expected closing date is May 2025. The placed in-service date is December 2026. Co-developers are Versa Development and The Brownsville Housing Opportunity Corporation (BHOC), an affiliated non-profit owned by the Housing Authority of the City of Brownsville. BHOC is also the General Partner of the Limited Partnership. This project also received an Affordable Housing Program Grant from the Federal Home Loan Bank of Dallas, in the amount of \$1.7 million dollars. The total tax credits awarded was \$16.4 million dollars.

Buena Vida Family, 2024 9% HTC, 80 RAD Tax Credit Units-

This is one of three tax credit projects awarded by TDHCA in the 2024 round. The name of the property is pending to be chosen. This project is part of the re-development of the former Buena Vida Public Housing site, which is the anchor of the Buena Vida HUD Choice

Neighborhood Plan. It also is part of the Housing Strategy Phase II of said plan. HACB will utilize the Faircloth to RAD program with the 9% HTC program. Please note HACB received the NARR in February 2024 and submitted the development proposal in February 2025. The expected closing date is May 2025. The placed in-service date is December 2026. Co-developers are Versa Development and The Brownsville Housing Opportunity Corporation (BHOC), an affiliated non-profit owned by the Housing Authority of the City of Brownsville. BHOC is also the General Partner of the Limited Partnership. The total tax credits awarded was \$20 million dollars.

#### **Buena Vida Senior, 2024 9% HTC, 82 RAD Tax Credit Units-**

This is one of three tax credit projects awarded by TDHCA in the 2024 round. The name of the property is pending to be chosen. This project is part of the re-development of the former Buena Vida Public Housing site, which is the anchor of the Buena Vida HUD Choice Neighborhood Plan. It also is part of the Housing Strategy Phase II of said plan. HACB will utilize the Faircloth to RAD program with the 9% HTC program. Please note HACB received the NARR in February 2024 and submitted the development proposal in February 2025. The expected closing date is May 2025. The placed in-service date is December 2026. Co-developers are Versa Development and The Brownsville Housing Opportunity Corporation (BHOC), an affiliated non-profit owned by the Housing Authority of the City of Brownsville. BHOC is also the General Partner of the Limited Partnership. The total tax credits awarded was \$20 million dollars.

#### **Victoria Gardens, 2025 9% HTC application, 84 Tax Credit Units-**

The Brownsville Housing Opportunity Corporation (BHOC) in partnership with Versa Development will apply for a 9% HTC application in the amount of \$20 million dollars. The goal is to redevelop Victoria Gardens which was the anchor site of the International Southmost HUD Choice Neighborhood Project. This is Phase II of the Housing Strategy outlined in the Plan. HACB will consider the possibility of entering into a HAP PBV Contract for this project, post award. Procurement procedures and HUD requirements will be adhered to. Total housing tax credit amount to be requested is approximately, \$20 million dollars. Awards will be announced in July 2025.

#### **Future Development Projects:**

- Re-development of Bougainvillea in 2026, utilizing the 9% HTC program and PBV program. HACB will also consider this site to be a supportive housing community.
- Development of Boca Chica land in 2026, utilizing the 9% HTC program and RAD program. Requesting a Transfer of Assistance related to Sanchez Vela, 30 units and Tangelo Quarters Phase I and II.

- Rehabilitation/Renovation of Paseo Plaza and both Rancho del Cielo properties, utilizing the 4% bond reservation held by the Brownsville Housing Finance Corporation.

Investor Buyout and Refinance of the following existing tax credit sites:

- Candlewick Apartments – refinance of loan which matures November 2025 and buyout of Special Limited Partner.
- Sunset Haven Apartments – finalization of refinance of loan in Q1/Q2 2024.

Real Estate Strategies:

- Exploring options of elderly site, Villa Del Sol. Consideration to request HUD approval to transfer assistance to a new site due to the condition of the property. Analyzing the option of selling said property.





## MISSION

To increase opportunities for affordable, quality housing and support self-sufficiency through collaborative partnerships.

## VISION

**Housing:** Increase the number of high-quality, well-managed, affordable units that are responsive to the needs of the community.

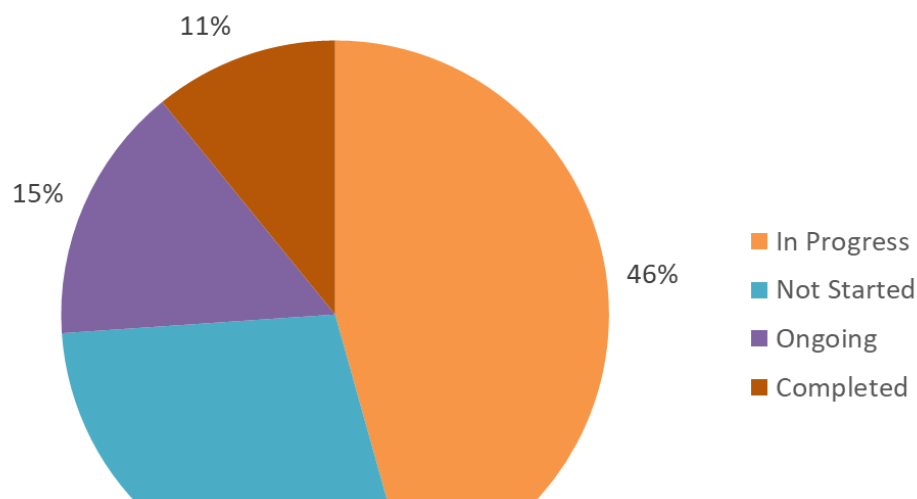
**People:** Improve health, safety, employment, mobility, and educational outcomes with responsive and relevant resources delivered to our community.

**Community:** Create the conditions necessary for public and private investments in community assets and amenities that will help families live their best life.

## GOALS

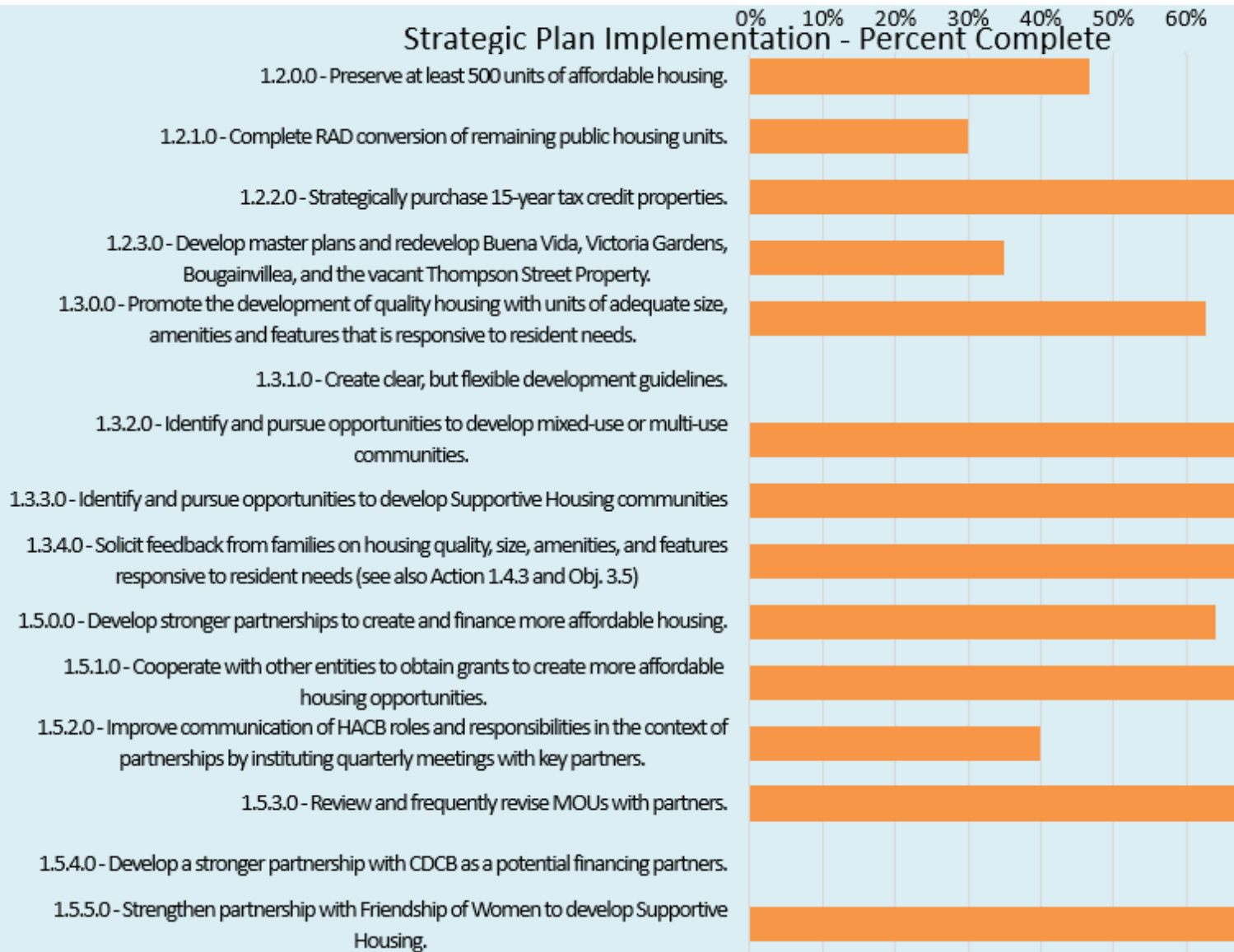
1. **Housing:** Promote high quality affordable housing by increasing HACB-supported units by 1,000 by 2027.
2. **People:** Provide high quality, impactful services to 200 more households by 2027.
3. **Community:** Promote strong communities through collaborative initiatives and coordination of services and programs.
4. **Organization:** Support an organizational culture of excellence by continuing to invest in and empower our greatest asset, our employees.
5. **Capacity:** Build capacity for a comprehensive approach to housing, people, and community.

Strategic Plan Implementation Status





## Strategic Plan Implementation - Percent Complete

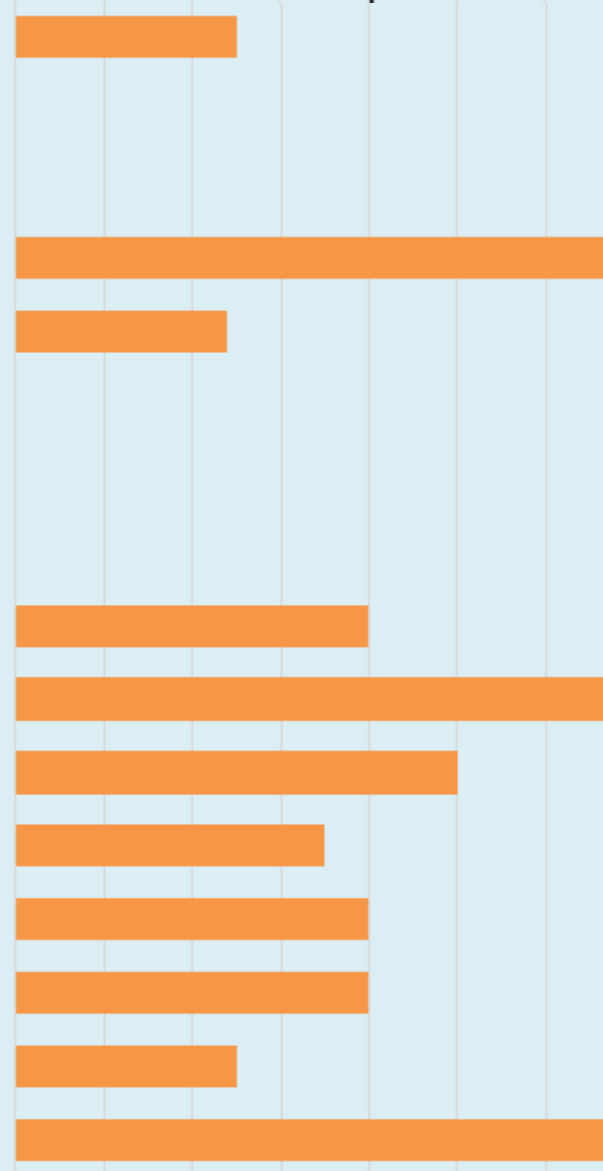




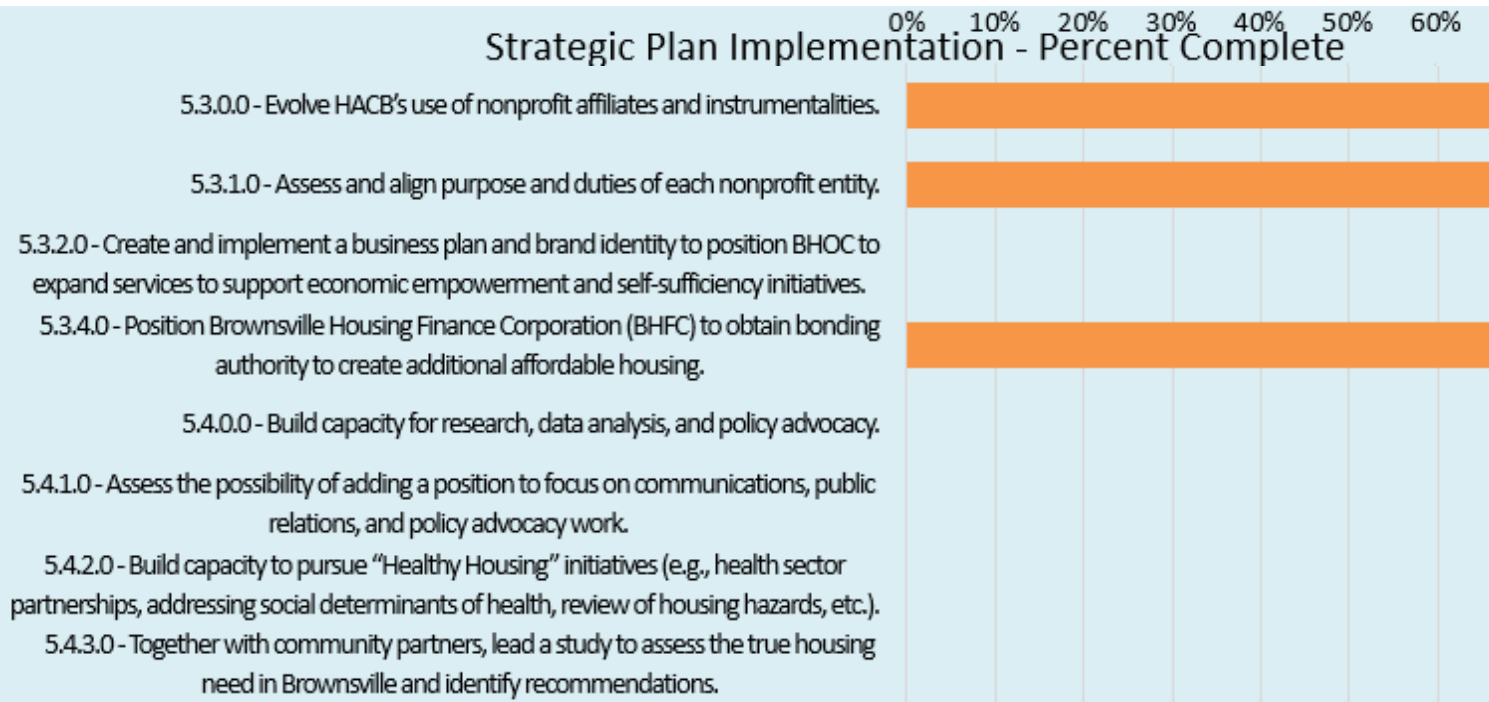
## Strategic Plan Implementation - Percent Complete

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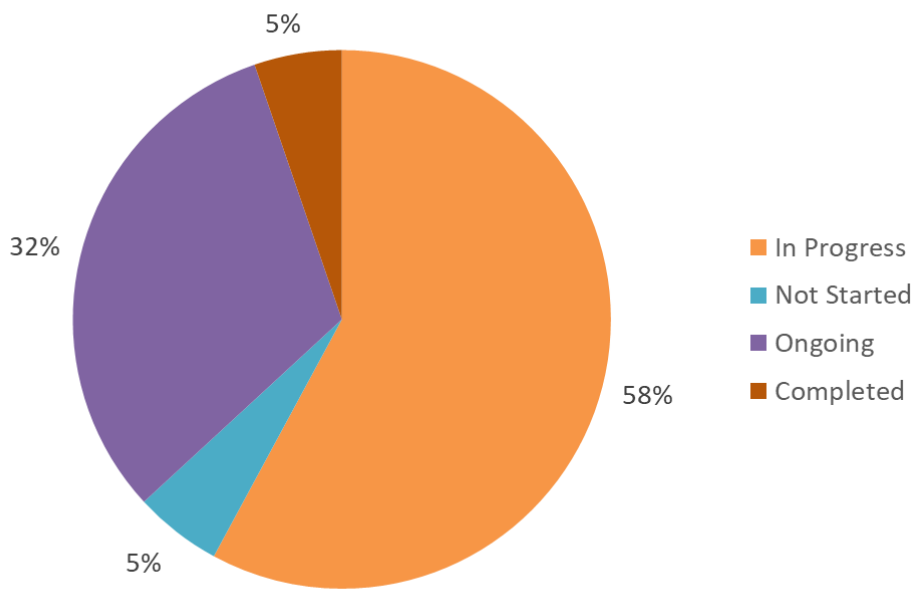
- 1.7.0.0 - Work with the City of Brownsville and other partners to address all affordable housing needs in the city.
- 1.7.1.0 - Collaborate with the City to identify strategies to address housing needs of middle-income families (50%-80%).
- 1.7.2.0 - Collaborate with the City to identify strategies to address housing needs of mixed status families.
- 1.7.3.0 - Develop a specialized skillset for rehabilitating historic buildings.
- 2.5.0.0 - Strengthen capacity for continuous improvement based on client and partner feedback.
- 2.5.1.0 - Create systems to regularly request input from residents and participants on visits to the office, appointment length, quality of services.
- 2.5.2.0 - Create, administer, and analyze surveys to clients and partner agencies to obtain feedback on services.
- 2.5.3.0 - Create and implement processes to address deficiencies and better serve HACB clients.
- 2.5.4.0 - Incorporate processes for continuous improvement into HACB employee training, development, and supervision.
- 2.5.5.0 - Build capacity to serve families experiencing homelessness.
- 5.0.0.0 - Capacity: Build capacity for a comprehensive approach to housing, people, and community.
- 5.1.0.0 - Expand property management capacity through the creation of a property management company through Brownsville Housing Management Corporation.
- 5.1.1.0 - Create a business plan for property management function of BHMC.
- 5.1.2.0 - Implement the BHMC business plan to transition property management function to BHMC.
- 5.1.3.0 - Position BHMC to provide property management services to 1,500 units.
- 5.3.0.0 - Evolve HACB's use of nonprofit affiliates and instrumentalities.



## Strategic Plan Implementation - Percent Complete



## Strategic Plan Implementation Status



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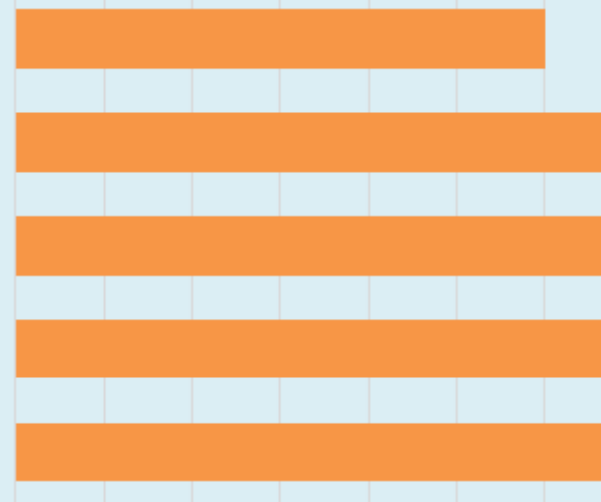
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## Strategic Plan Implementation - Percent Complete

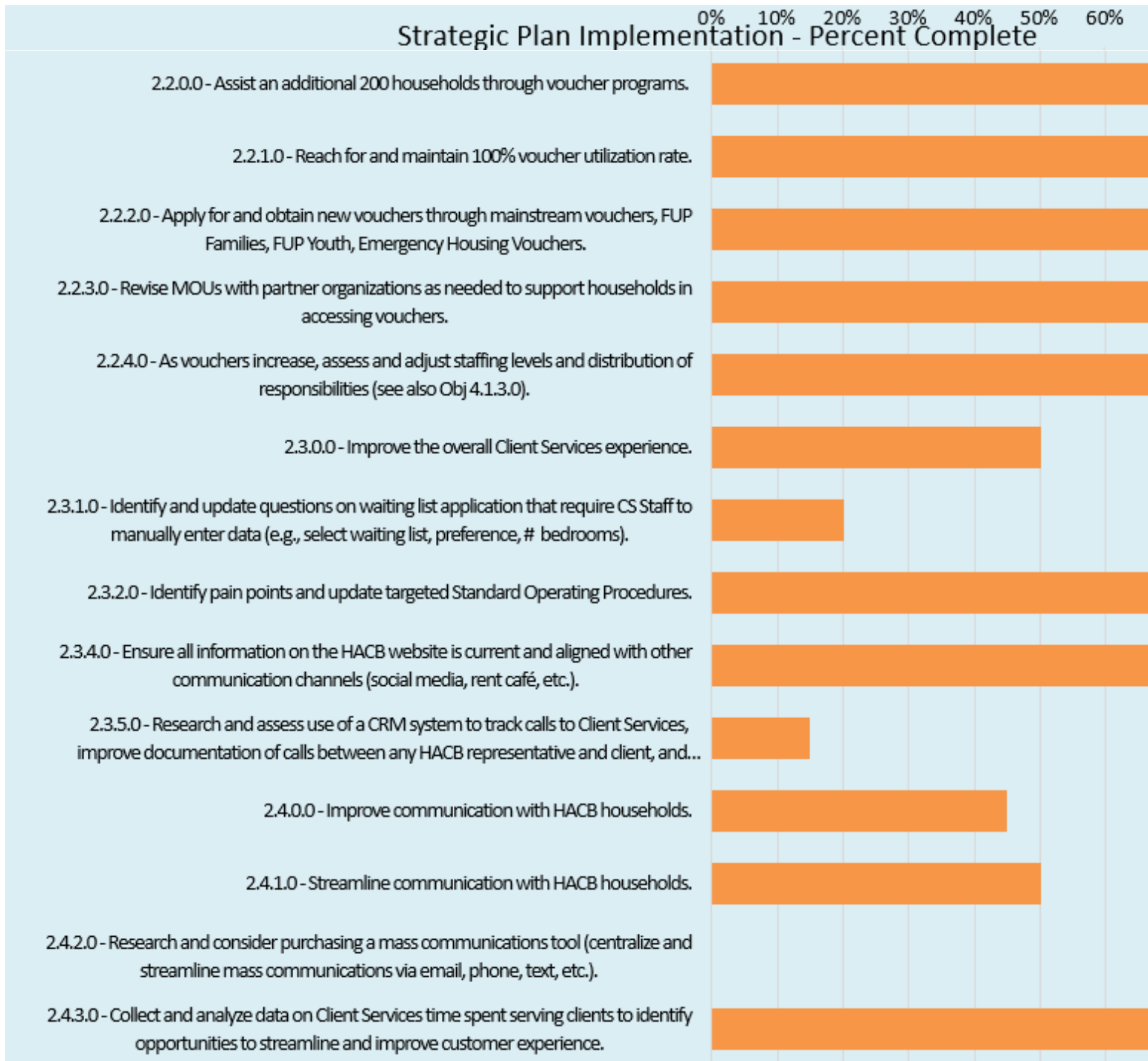
- 2.0.0.0 - People: Provide high quality, impactful services to 200 more households by 2027
- 2.1.0.0 - Assist households on the wait list (both HCV and PH) to obtain affordable, stable housing and reduce the time on the wait list from approximately 12 to 6 months.
- 2.1.1.0 - Streamline process for manual and online applications to reduce duplication.
- 2.1.2.0 - Conduct a biennial waiting list purge in Year 1. Assess after year 2 if quarterly purges are feasible.
- 2.1.3.0 - Review findings and recommendations of Organizational Assessment and identify changes to staffing levels and job responsibilities to support 2.1 (especially...

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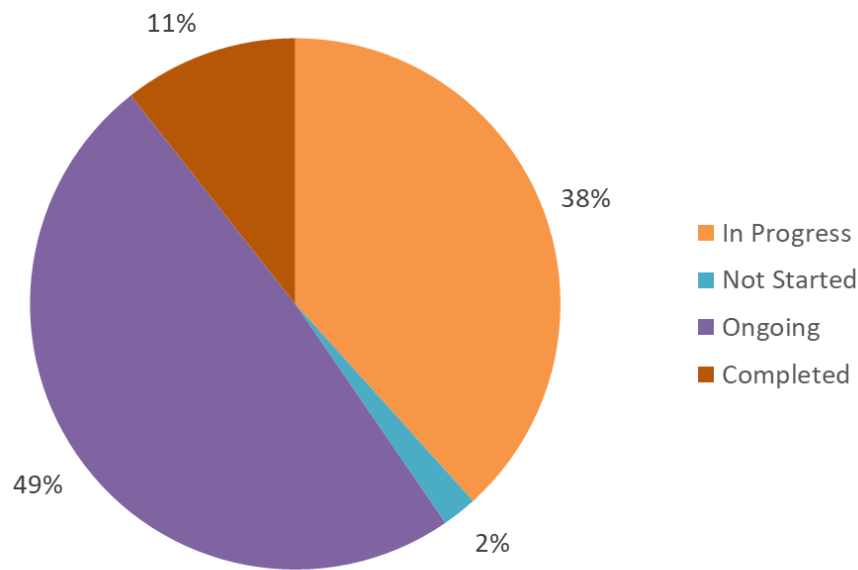




## Strategic Plan Implementation - Percent Complete



## Strategic Plan Implementation Status



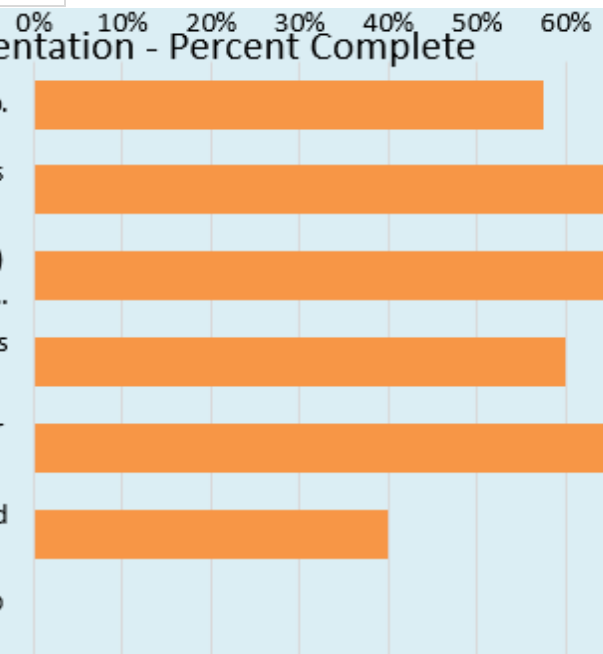
SUPPORTIVE

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## Strategic Plan Implementation - Percent Complete

- 1.6.0.0 - Promote access to homeownership.
- 1.6.1.0 - Create a process for assessing homeownership readiness and providing referrals to CDCB for homeownership and credit counseling.
- 1.6.2.0 - Build partnerships with lenders/mortgage companies (e.g. Finance of America) that lend to Homeownership Voucher Program Participants and establish a process for...
- 1.6.3.0 - Build partnerships with organizations with a shared interest in promoting access to homeownership.
- 1.6.4.0 - Increase marketing, outreach, and enrollment in the Homeownership Voucher Program.
- 1.6.5.0 - Review eligibility requirements for the Homeownership Voucher Program and advocate with HUD for additional flexibilities.
- 1.6.6.0 - Assess viability of using the Section 32 Public Housing Homeownership program.



## Strategic Plan Implementation - Percent Complete

0% 10% 20% 30% 40% 50% 60%

3.0.0.0 - Community: Promote strong communities through collaborative initiatives and coordination of services and programs.

3.1.0.0 - Revitalize and expand programs targeted to supporting youth in HACB households.

3.1.1.0 - Assess and adjust for needed capacity to recruit and expand services to serve all HACB households (includes HCV, tax credit properties, properties not served by...

3.1.2.0 - Promote a Cradle to College program that will impact 100% of children in HACB's households.

3.1.3.0 - Deepen and expand partnerships with local educational institutions (BISD, local charter schools, private schools, TSC, and UTRGV) to connect families to services.

3.1.4.0 - Maximize resources by partnering with established organizations on Head Start Programs.

3.2.0.0 - Incorporate economic opportunities into developments for HACB families.

3.2.1.0 - Increase FSS participation.

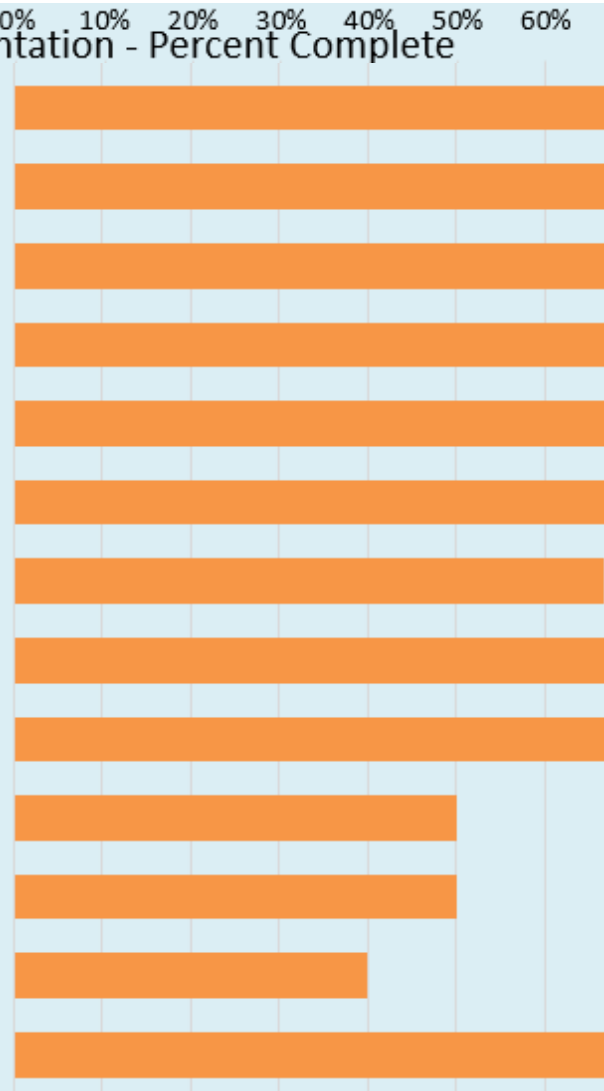
3.2.2.0 - Increase internal awareness and support for all Supportive Services programs among staff and private management companies through cross-training and...

3.2.3.0 - Develop and formalize partnerships to bring training classes for in-demand skills.

3.2.4.0 - Connect residents to opportunities to reskill through partners.

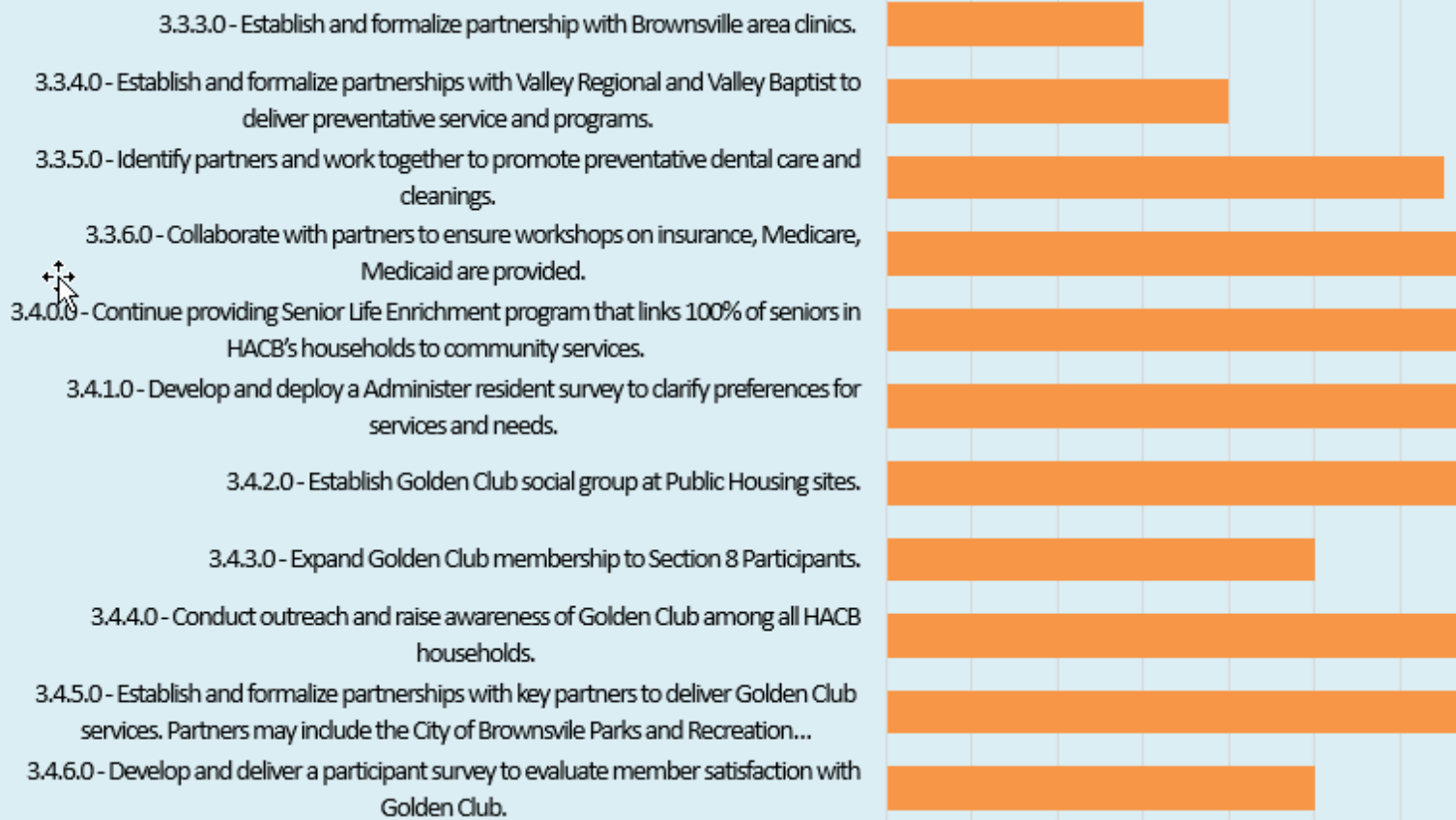
3.2.5.0 - Develop and formalize partnerships to connect HACB families to job opportunities.

3.2.6.0 - Connect residents to job opportunities through partners.

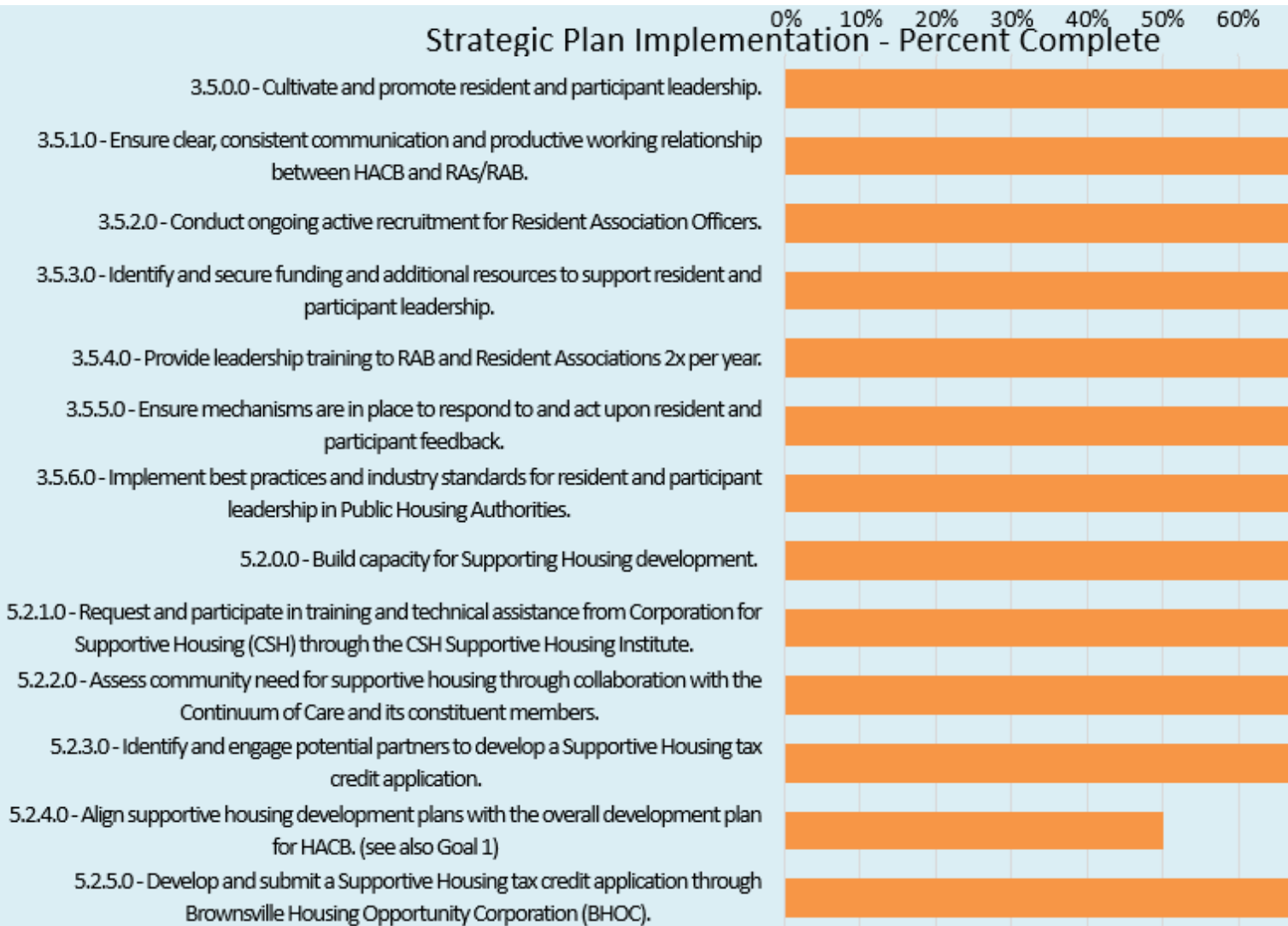




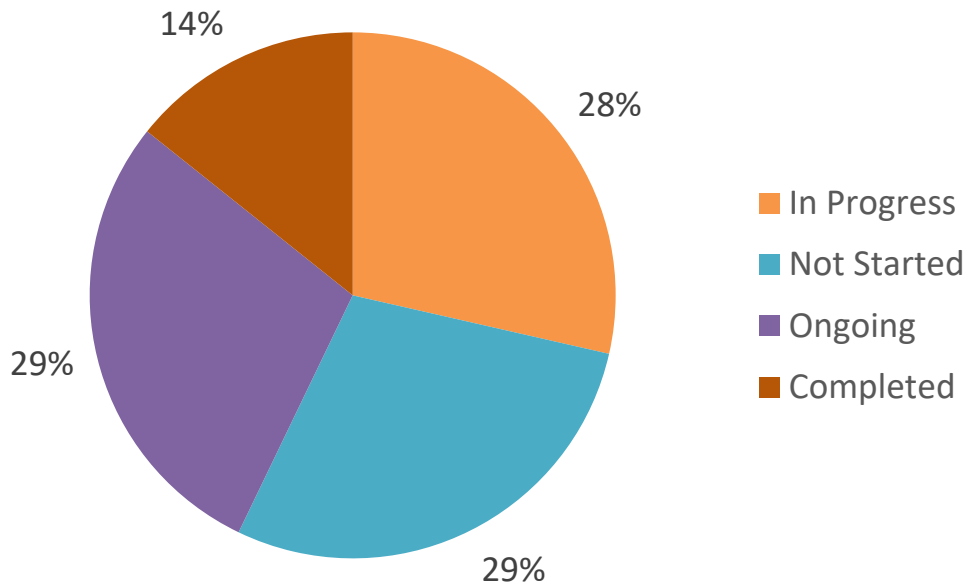
## Strategic Plan Implementation - Percent Complete



## Strategic Plan Implementation - Percent Complete



## Strategic Plan Implementation Status



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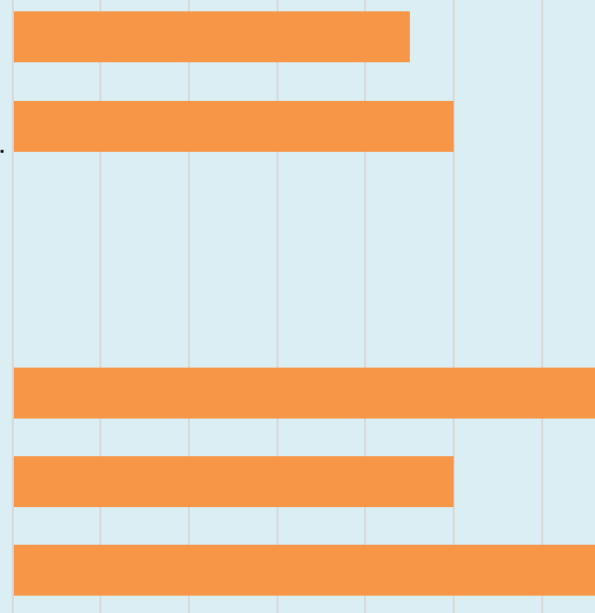
PROGRESS TR

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## Strategic Plan Implementation - Percent Complete

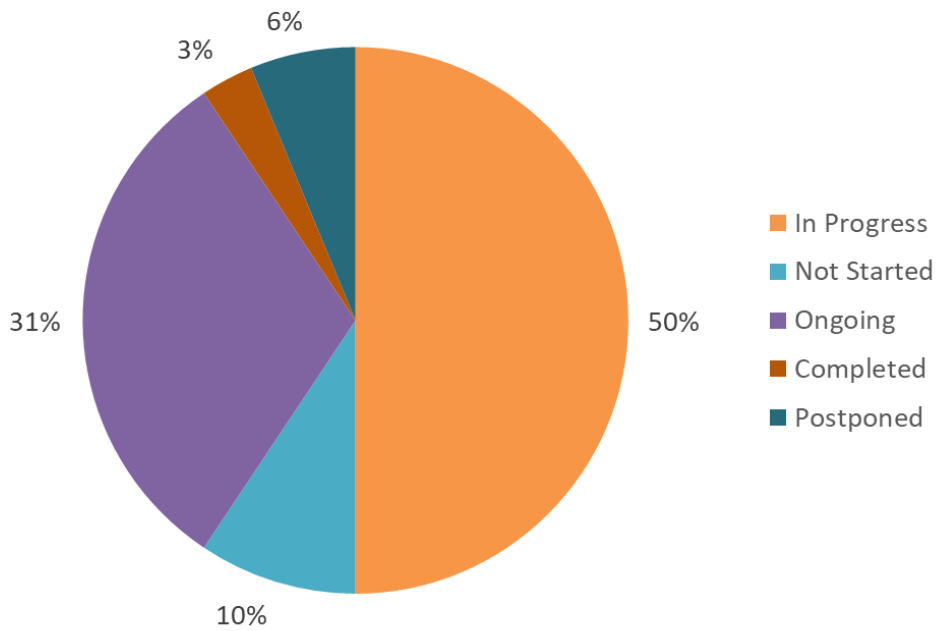
- 1.4.0.0 - Improve access to public transportation, sidewalks, walking trails for all HACB and affiliated nonprofit properties.
- 1.4.1.0 - Work with the City of Brownsville to identify & advocate for needed improvements to sidewalks, walking trails, & public transportation to benefit HACB...
- 1.4.2.0 - Review responses to socioeconomic survey to identify relevant challenges (also see 1.3.4.0).
- 1.4.3.0 - Expand Capital Needs Survey to all HACB properties.
- 1.4.4.0 - Establish accessibility guidelines into development standards (see also 1.1.1.0 and 1.3.1.0).
- 1.4.5.0 - Invest in community amenities that benefit HACB families.
- 1.4.6.0 - Coordinate with Supportive Services to ensure connections to public transportation are made where available.

0% 10% 20% 30% 40% 50% 60%





## Strategic Plan Implementation Status

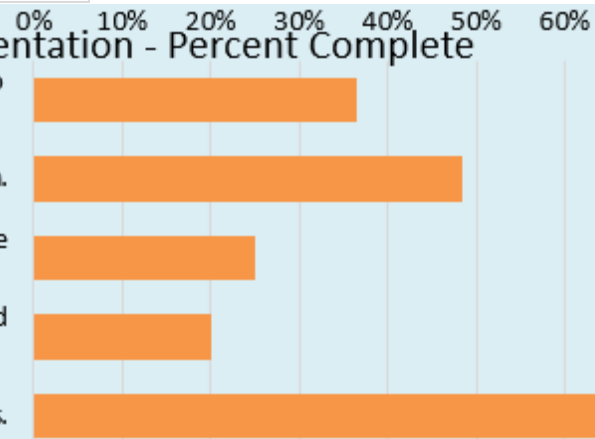


HR PROGRESS

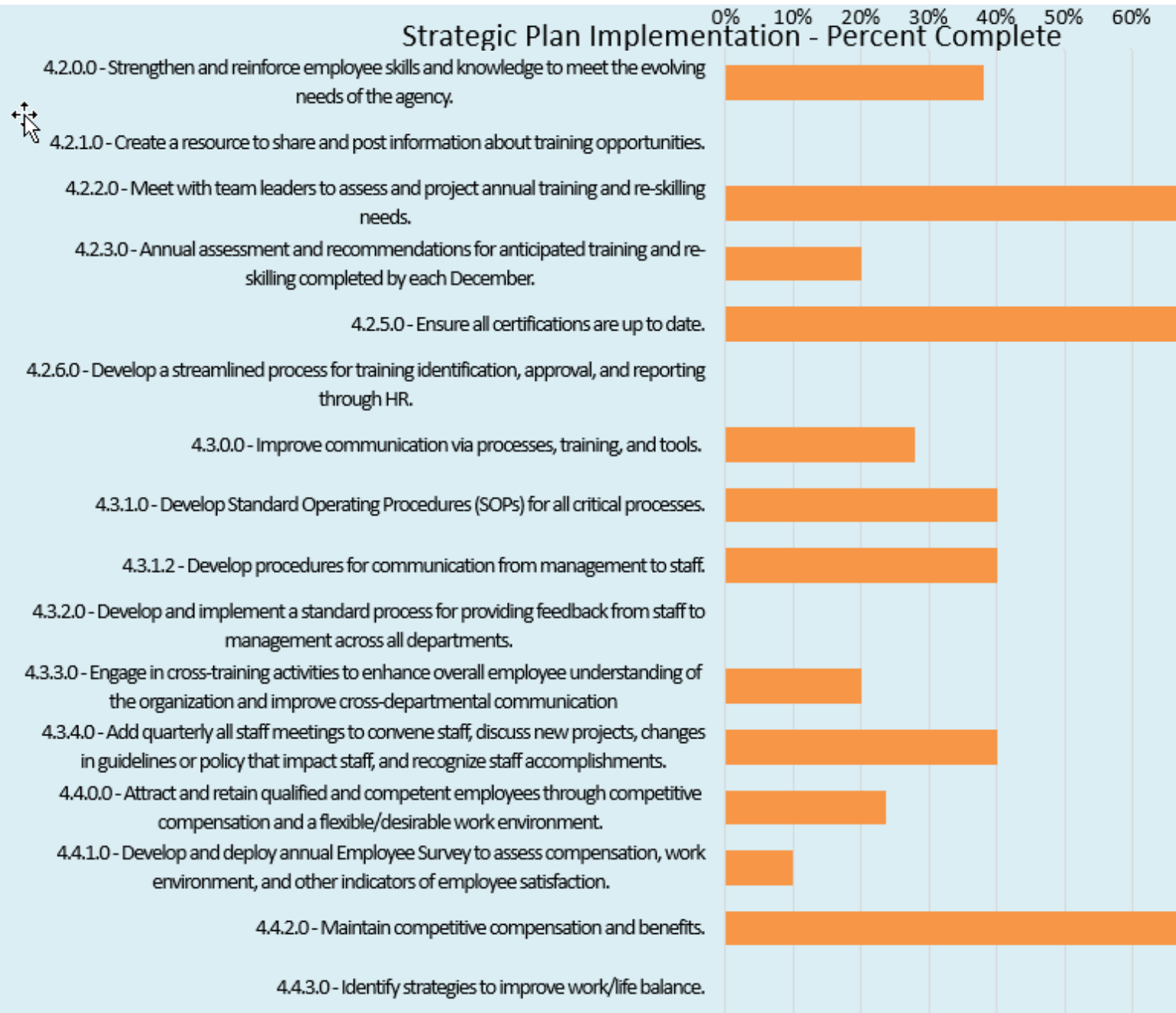
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## Strategic Plan Implementation - Percent Complete

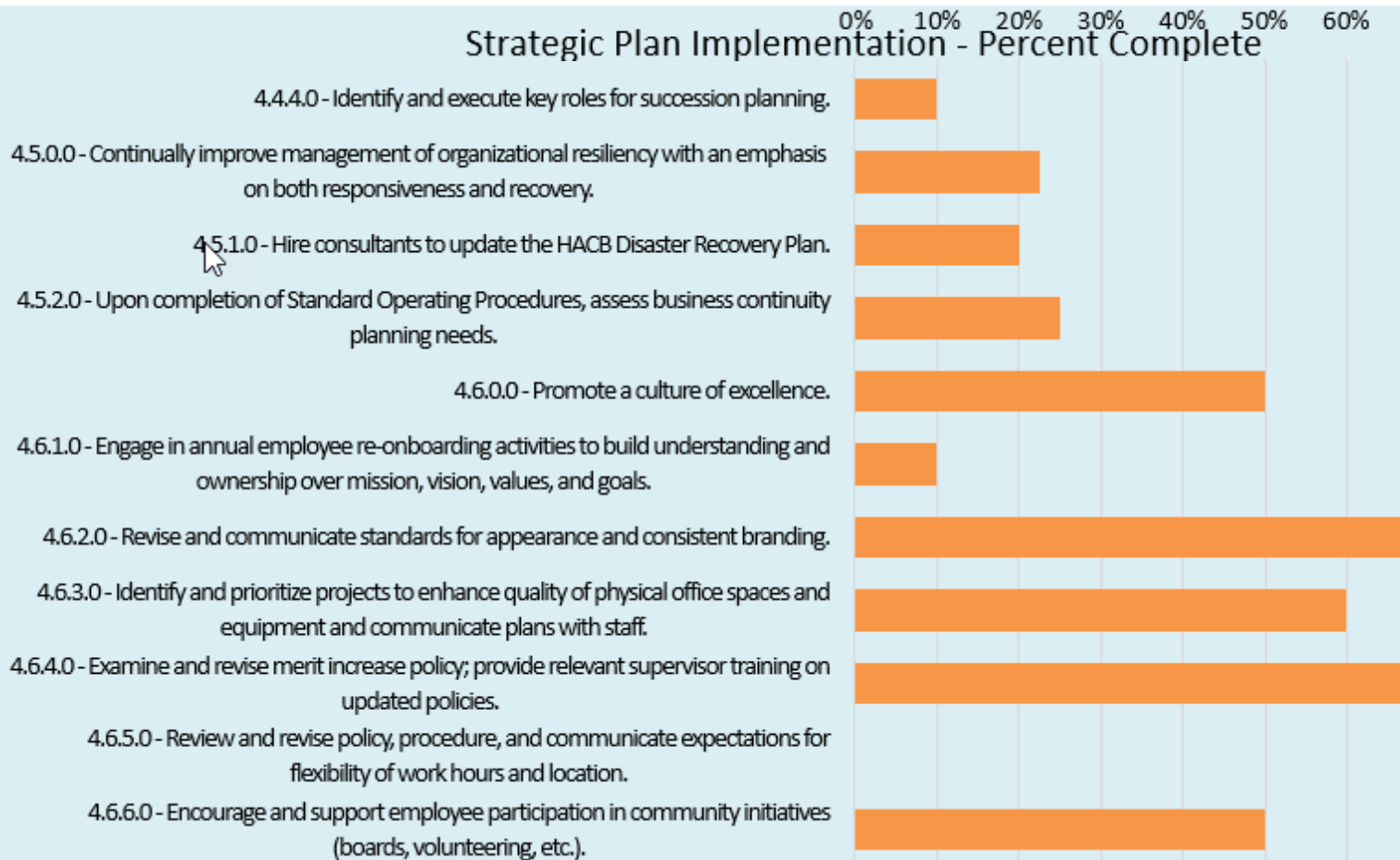
- 4.0.0.0 - Organization: Support an organizational culture of excellence by continuing to invest in and empower our greatest asset, our employees.
- 4.1.0.0 - Update the organizational structure and staffing plan.
- 4.1.1.0 - Assess need to create a real estate development team, whether to hire externally, or to reskill internal staff for real estate development (pending org...
- 4.1.2.0 - Annual assessment and recommendations for anticipated staffing completed by each December.
- 4.1.3.0 - Meet with team leaders to assess and project annual staffing needs.



## Strategic Plan Implementation - Percent Complete



## Strategic Plan Implementation - Percent Complete

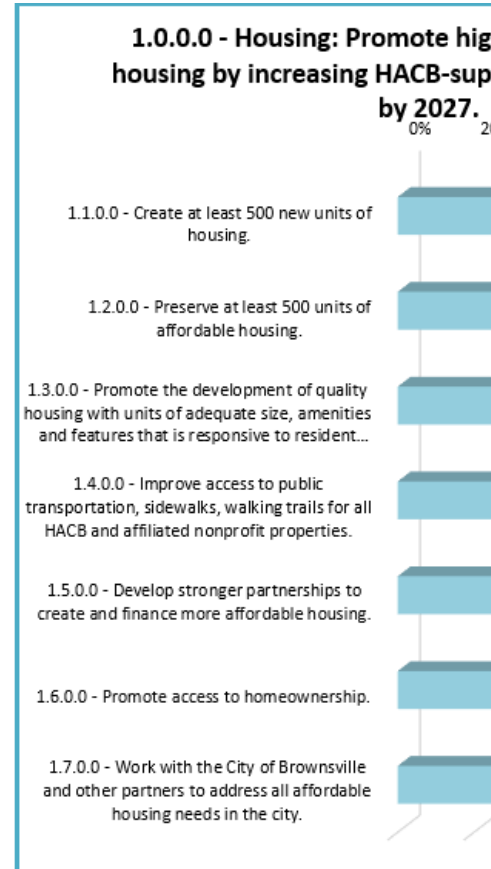




## Strategic Plan Goal 1:

**Housing: Promote high quality affordable housing by increasing HACB-supported units by 1,000 by 2027.**

| Goal      | 1.0.0.0 - Housing: Promote high quality affordable housing by increasing HACB-supported units by 1,000 by 2027.                                | Status      | Progress |
|-----------|--|-------------|----------|
| Objective | 1.1.0.0 - Create at least 500 new units of housing.  | In Progress | 44%      |
| Objective | 1.2.0.0 - Preserve at least 500 units of affordable housing.   | In Progress | 47%      |
| Objective | 1.3.0.0 - Promote the development of quality housing with units of adequate size, amenities and features that is responsive to resident needs. | In Progress | 63%      |
| Objective | 1.4.0.0 - Improve access to public transportation, sidewalks, walking trails for all HACB and affiliated nonprofit properties.                 | In Progress | 45%      |
| Objective | 1.5.0.0 - Develop stronger partnerships to create and finance more affordable housing.   | In Progress | 64%      |
| Objective | 1.6.0.0 - Promote access to homeownership.   | In Progress | 58%      |
| Objective | 1.7.0.0 - Work with the City of Brownsville and other partners to address all affordable housing needs in the city.                            | Ongoing     | 25%      |

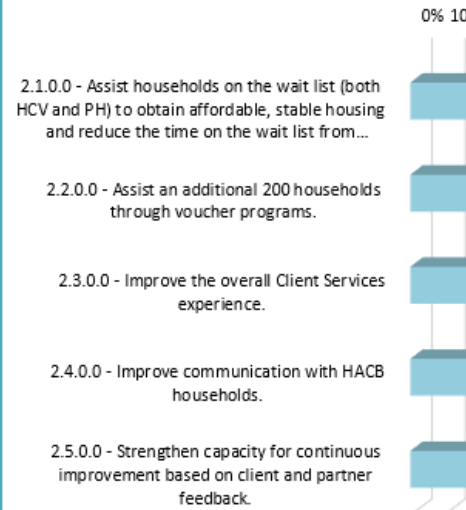


## Strategic Plan Goal 2:

### People: Provide high quality, impactful services to 200 more households


| Goal      | 2.0.0.0 - People: Provide high quality, impactful services to 200 more households by 2027   | Status      | Progress |
|-----------|---|-------------|----------|
| Objective | 2.1.0.0 - Assist households on the wait list (both HCV and PH) to obtain affordable, stable housing and reduce the time on the wait list from approximately 12 to 6 months. | In Progress | 98%      |
| Objective | 2.2.0.0 - Assist an additional 200 households through voucher programs.   | In Progress | 98%      |
| Objective | 2.3.0.0 - Improve the overall Client Services experience.   | In Progress | 50%      |
| Objective | 2.4.0.0 - Improve communication with HACB households.   | In Progress | 45%      |
| Objective | 2.5.0.0 - Strengthen capacity for continuous improvement based on client and partner feedback.  | In Progress | 24%      |

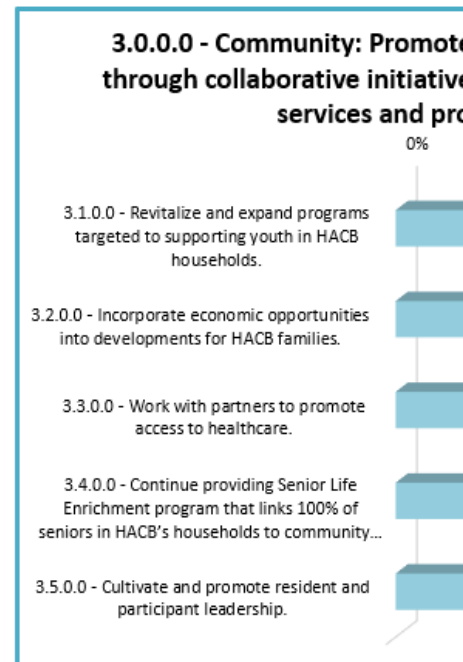
#### 2.0.0.0 - People: Provide high quality, impactful services to 200 more households



### Strategic Plan Goal 3:

**Community: Promote strong communities through collaborative initiatives and coordination of services and programs.**

|  Goal | 3.0.0.0 - Community: Promote strong communities through collaborative initiatives and coordination of services and programs.       | Status      | Progress |
|--|--|-------------|----------|
| Objective  | 3.1.0.0 - Revitalize and expand programs targeted to supporting youth in HACB households.  | In Progress | 81%      |
| Objective  | 3.2.0.0 - Incorporate economic opportunities into developments for HACB families.  | Ongoing     | 67%      |
| Objective  | 3.3.0.0 - Work with partners to promote access to healthcare.  | In Progress | 71%      |
| Objective  | 3.4.0.0 - Continue providing Senior Life Enrichment program that links 100% of seniors in HACB's households to community services. | Ongoing     | 83%      |
| Objective  | 3.5.0.0 - Cultivate and promote resident and participant leadership.   | In Progress | 88%      |

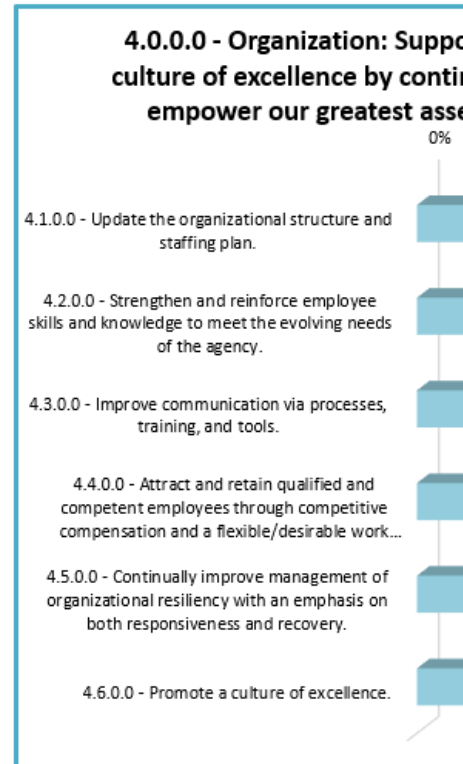




## Strategic Plan Goal 4:

**Organization: Support an organizational culture of excellence by continuing to invest in and empower our greatest asset, our employees.**

| Goal      | 4.0.0.0 - Organization: Support an organizational culture of excellence by continuing to invest in and empower our greatest asset, our employees. | Status      | Progress |
|-----------|---|-------------|----------|
| Objective | 4.1.0.0 - Update the organizational structure and staffing plan.  | In Progress | 48%      |
| Objective | 4.2.0.0 - Strengthen and reinforce employee skills and knowledge to meet the evolving needs of the agency.  | In Progress | 38%      |
| Objective | 4.3.0.0 - Improve communication via processes, training, and tools.   | In Progress | 28%      |
| Objective | 4.4.0.0 - Attract and retain qualified and competent employees through competitive compensation and a flexible/desirable work environment.        | Ongoing     | 24%      |
| Objective | 4.5.0.0 - Continually improve management of organizational resiliency with an emphasis on both responsiveness and recovery.                       | In Progress | 23%      |
| Objective | 4.6.0.0 - Promote a culture of excellence.  | In Progress | 50%      |



## Strategic Plan Goal 5:

**Capacity: Build capacity for a comprehensive approach to housing, people, and community.**

| Goal      | 5.0.0.0 - Capacity: Build capacity for a comprehensive approach to housing, people, and community.  | Status      | Progress |
|-----------|---|-------------|----------|
| Objective | 5.1.0.0 - Expand property management capacity through the creation of a property management company through Brownsville Housing Management Corporation. | In Progress | 35%      |
| Objective | 5.2.0.0 - Build capacity for Supporting Housing development.  | In Progress | 79%      |
| Objective | 5.3.0.0 - Evolve HACB's use of nonprofit affiliates and instrumentalities.  | In Progress | 67%      |
| Objective | 5.4.0.0 - Build capacity for research, data analysis, and policy advocacy.  | Not Started | 0%       |

### 5.0.0.0 - Capacity: Build capacity for a comprehensive approach to housing, people, and community.

5.1.0.0 - Expand property management capacity through the creation of a property management company through Brownsville Housing...

5.2.0.0 - Build capacity for Supporting Housing development.

5.3.0.0 - Evolve HACB's use of nonprofit affiliates and instrumentalities.

5.4.0.0 - Build capacity for research, data analysis, and policy advocacy.