SCHUYLKILL COUNTY HOUSING AUTHORITY

HUD-50075

2015-2019 FIVE-YEAR AND ANNUAL PLAN

December 11, 2014

Prepared by: T. Elias & Associates

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PHA 5-Year and			tment of Housing and	OMB No. 2577-0226				
Annual Plan		Developme		Expires 4/30/2011				
	Annual Plan Office of Public and Indian Housing							
1.0	PHA Information							
	PHA Name: Schuylkill County	Housing Au	thority	PHA Code: P	A016			
		High Performing	Standard	HCV (Sec				
	PHA Fiscal Year Beginning: (MM/YYYY): 04/2015							
2.0	Inventory (based on ACC units at time	of FY beginning						
	Number of PH units: 609		Number of HCV units:	531				
3.0	Submission Type							
	∑ 5-Year and Annual Plan	Annual	Plan Only	5-Year Plan Only				
4.0								
	PHA Consortia	PHA Consorti	a: (Check box if submitting a joi	nt Plan and complete	table below.)			
		PHA	Program(s) Included in the	Programs Not in th	No. of Units in Each			
	Participating PHAs	Code	Consortia	Consortia	Flograni			
	PHA 1:				PH HCV			
	PHA 1: PHA 2:							
	РНА 3:							
5.0	5-Year Plan. Complete items 5.1 and 5	5.2 only at 5-Year	Plan update.					
5.1	Mission. State the PHA's Mission for	comvine the needs	of low income your low income	and autromaly law	income families in the DUA's			
5.1	jurisdiction for the next five years:	serving the needs	of low-income, very low-income	e, and extremely low	income fammes in the PHA's			
	5							
	The mission of the Schuylk	ill County H	lousing Authority is: T	'o promote ade	quate and affordable			
	housing, economic opportu	nity and a su	uitable living environn	nent free from	discrimination			
			1 1 1 2 3 4 5 44	11 1 5774				
5.2	Goals and Objectives. Identify the PF low-income, and extremely low-income							
	and objectives described in the previou		lext rive years. Include a report	on the progress the r	TA has made in meeting the goals			
	See attached Section 10.0 A	dditional In	formation					
	PHA Plan Update							
	(a) Identify all PHA Plan elem	ents that have been	n revised by the PHA since its la	st Annual Plan submi	ission:			
	1. Admission and	Occupancy	Policy					
	2. Administrative	Plan	-					
6.0	3. Flat Rents							
	4. HCV Payment	Standards						
			lic may obtain copies of the 5-Y	ear and Annual PHA	Plan. For a complete list of PHA			
	(b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions.							
	The SCHA 2015 Annual Plan may be obtained by the public, including updates, at each Asset							
	Management Project (AMP) and the main office of the Authority at 245 Parkway, Schuylkill							
	Haven, Pennsylvania. SCHA also provided each Commissioner and Advisory Council							
	member with a copy of its 2015 Annual Plan and Five-Year Plan.							
	member with a copy of its 2015 Annual Flat and Flot-Flat Flat.							
1								

	Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. Include statements related to these programs as applicable.						
7.0	Homeownership: The Housing Authority has included procedures in its Administrative Plan to administer a Homeownership Program utilizing its Housing Choice Vouchers if there is a determination of need.						
	Project-based Vouchers: The Housing Authority wishes to use the project-based voucher program, on an as needed basis not to exceed the HUD limitations, throughout Schuylkill						
	County in accordance with the Section 8 Housing Voucher Administrative Plan as amended.						
8.0	Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable. SEE HUD FORM 50075.2 APPROVED BY HUD ON FEBUARY 4, 2014 (LETTER ATTACHED)						
8.1	Capital Fund Program Annual Statement/Performance and Evaluation Report. As part of the PHA 5-Year and Annual Plan, annually complete and submit the <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> , form HUD-50075.1, for each current and open CFP grant and CFFP financing.						
	To be submitted with the ACC Capital Fund Amendment						
8.2	Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the <i>Capital Fund</i> <i>Program Five-Year Action Plan</i> , form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan. To be submitted with the ACC Capital Fund Amendment						
8.3	Capital Fund Financing Program (CFFP). Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements.						
9.0	Housing Needs. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. See the attached Section 9.0 for Housing Needs information						
9.1	Strategy for Addressing Housing Needs. Provide a brief description of the PHA's strategy for addressing the housing needs of families in the						
9.1	jurisdiction and on the waiting list in the upcoming year. Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan.						
	See the attached Section 9.1 for SCHA's Strategy for Addressing Housing Needs Additional Information. Describe the following, as well as any additional information HUD has requested.						
10.0	 (a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5- Year Plan. 						
	See Section 5.2 Above (b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification"						
	See Section 10(b) Additional Information attached for updated definition.						
11.0							
11.0	Required Submission for HUD Field Office Review . In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. Note: Faxed copies of these documents will not be accepted by the Field Office.						
	 (a) Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> (which includes all certifications relating to Civil Rights) (b) Form HUD-50070, <i>Certification for a Drug-Free Workplace</i> (PHAs receiving CFP grants only) 						
	 (c) Form HUD-50071, Certification of Payments to Influence Federal Transactions (PHAs receiving CFP grants only) (d) Form SF-LLL, Disclosure of Lobbying Activities (PHAs receiving CFP grants only) 						
	 (e) Form SF-LLL-A, <i>Disclosure of Lobbying Activities Continuation Sheet</i> (PHAs receiving CFP grants only) (f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations. (g) Challenged Elements 						
	 (h) Form HUD-50075.1, Capital Fund Program Annual Statement/Performance and Evaluation Report (PHAs receiving CFP grants only) (i) Form HUD-50075.2, Capital Fund Program Five-Year Action Plan (PHAs receiving CFP grants only) 						

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced 5-Year and Annual PHA Plans. 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 and strategies for serving the needs of low-income and very low-income families. This form is to be used by all PHA types for submission of the 5-Year and Annual Plans to HUD. Public reporting burden for this information collection is estimated to average 12.68 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality

Instructions form HUD-50075

Applicability. This form is to be used by all Public Housing Agencies (PHAs) with Fiscal Year beginning April 1, 2008 for the submission of their 5-Year and Annual Plan in accordance with 24 CFR Part 903. The previous version may be used only through April 30, 2008.

1.0 PHA Information

Include the full PHA name, PHA code, PHA type, and PHA Fiscal Year Beginning (MM/YYYY).

2.0 Inventory

Under each program, enter the number of Annual Contributions Contract (ACC) Public Housing (PH) and Section 8 units (HCV).

3.0 Submission Type

Indicate whether this submission is for an Annual and Five Year Plan, Annual Plan only, or 5-Year Plan only.

4.0 PHA Consortia

Check box if submitting a Joint PHA Plan and complete the table.

5.0 Five-Year Plan

Identify the PHA's Mission, Goals and/or Objectives (24 CFR 903.6). Complete only at 5-Year update.

5.1 Mission. A statement of the mission of the public housing agency for serving the needs of low-income, very low-income, and extremely low-income families in the jurisdiction of the PHA during the years covered under the plan.

5.2 Goals and Objectives. Identify quantifiable goals and objectives that will enable the PHA to serve the needs of low income, very low-income, and extremely low-income families.

- **6.0 PHA Plan Update.** In addition to the items captured in the Plan template, PHAs must have the elements listed below readily available to the public. Additionally, a PHA must:
 - (a) Identify specifically which plan elements have been revised since the PHA's prior plan submission.
 - (b) Identify where the 5-Year and Annual Plan may be obtained by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central off ice of the PHA. PHAs are strongly encouraged to post complete PHA Plans on its official website. PHAs are also encouraged to provide each resident council a copy of its 5-Year and Annual Plan.

PHA Plan Elements. (24 CFR 903.7)

1. Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures. Describe the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV and unit assignment policies for public housing; and procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists.

- 2. Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA Operating, Capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources.
- **3. Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units.
- 4. **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA.
- 5. Grievance Procedures. A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants.
- 6. Designated Housing for Elderly and Disabled Families. With respect to public housing projects owned, assisted, or operated by the PHA, describe any projects (or portions thereof), in the upcoming fiscal year, that the PHA has designated or will apply for designation for occupancy by elderly and disabled families. The description shall include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, and; 5) the number of units affected.
- 7. Community Service and Self-Sufficiency. A description of: (1) Any programs relating to services and amenities provided or offered to assisted families; (2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS; (3) How the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. (Note: applies to only public housing).
- 8. Safety and Crime Prevention. For public housing only, describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must include: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities.

- 9. Pets. A statement describing the PHAs policies and requirements pertaining to the ownership of pets in public housing.
- 10. Civil Rights Certification. A PHA will be considered in compliance with the Civil Rights and AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction.
- 11. Fiscal Year Audit. The results of the most recent fiscal year audit for the PHA.
- 12. Asset Management. A statement of how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory.
- 13. Violence Against Women Act (VAWA). A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families.

7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers

Hope VI or Mixed Finance Modernization or Development. (a) 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI, Mixed Finance Modernization or Development, is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm

(b) Demolition and/or Disposition. With respect to public housing projects owned by the PHA and subject to ACCs under the Act: (1) A description of any housing (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. The application and approval process for demolition

and/or disposition is a separate process. See guidance on HUD's website at:

http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.c fm

Note: This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed.

Conversion of Public Housing. With respect to public (c) housing owned by a PHA: 1) A description of any building or buildings (including project number and unit count) that the PHA is required to convert to tenant-based assistance or that the public housing agency plans to voluntarily convert; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received under this chapter to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/conversion.cfm

- (d) Homeownership. A description of any homeownership (including project number and unit count) administered by
- the agency or for which the PHA has applied or will apply for approval.
- (e) Project-based Vouchers. If the PHA wishes to use the project-based voucher program, a statement of the projected number of project-based units and general locations and how project basing would be consistent with its PHA Plan.
- 8.0 Capital Improvements. This section provides information on a PHA's Capital Fund Program. With respect to public housing projects owned, assisted, or operated by the public housing agency, a plan describing the capital improvements necessary to ensure long-term physical and social viability of the projects must be completed along with the required forms. Items identified in 8.1 through 8.3, must be signed where directed and transmitted electronically along with the PHA's Annual Plan submission.
 - 8.1 Capital Fund Program Annual Statement/Performance and Evaluation Report. PHAs must complete the Capital Fund Program Annual Statement/Performance and Evaluation Report (form HUD-50075.1), for each Capital Fund Program (CFP) to be undertaken with the current year's CFP funds or with CFFP proceeds. Additionally, the form shall be used for the following purposes:
 - (a) To submit the initial budget for a new grant or CFFP;
 - (b) To report on the Performance and Evaluation Report progress on any open grants previously funded or CFFP; and
 - To record a budget revision on a previously approved open (c) grant or CFFP, e.g., additions or deletions of work items, modification of budgeted amounts that have been undertaken since the submission of the last Annual Plan. The Capital Fund Program Annual Statement/Performance and Evaluation Report must be submitted annually.

Additionally, PHAs shall complete the Performance and Evaluation Report section (see footnote 2) of the Capital Fund Program Annual Statement/Performance and Evaluation (form HUD-50075.1), at the following times:

- At the end of the program year; until the program is 1. completed or all funds are expended;
- When revisions to the Annual Statement are made, 2. which do not require prior HUD approval, (e.g., expenditures for emergency work, revisions resulting from the PHAs application of fungibility); and
- 3. Upon completion or termination of the activities funded in a specific capital fund program year.

8.2 Capital Fund Program Five-Year Action Plan

PHAs must submit the Capital Fund Program Five-Year Action Plan (form HUD-50075.2) for the entire PHA portfolio for the first year of participation in the CFP and annual update thereafter to eliminate the previous year and to add a new fifth year (rolling basis) so that the form always covers the present five-year period beginning with the current year.

8.3 Capital Fund Financing Program (CFFP). Separate, written HUD approval is required if the PHA proposes to pledge any

portion of its CFP/RHF funds to repay debt incurred to finance capital improvements. The PHA must identify in its Annual and 5year capital plans the amount of the annual payments required to service the debt. The PHA must also submit an annual statement detailing the use of the CFFP proceeds. See guidance on HUD's website at:

http://www.hud.gov/offices/pih/programs/ph/capfund/cffp.cfm

- **9.0 Housing Needs.** Provide a statement of the housing needs of families residing in the jurisdiction served by the PHA and the means by which the PHA intends, to the maximum extent practicable, to address those needs. (**Note:** Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).
 - 9.1 Strategy for Addressing Housing Needs. Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).
- **10.0 Additional Information.** Describe the following, as well as any additional information requested by HUD:
 - (a) Progress in Meeting Mission and Goals. PHAs must include (i) a statement of the PHAs progress in meeting the mission and goals described in the 5-Year Plan; (ii) the basic criteria the PHA will use for determining a significant amendment from its 5-year Plan; and a significant amendment or modification to its 5-Year Plan and Annual Plan. (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).
 - (b) Significant Amendment and Substantial Deviation/Modification. PHA must provide the definition of "significant amendment" and "substantial deviation/modification". (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan.)

- (c) PHAs must include or reference any applicable memorandum of agreement with HUD or any plan to improve performance. (Note: Standard and Troubled PHAs complete annually).
- **11.0 Required Submission for HUD Field Office Review.** In order to be a complete package, PHAs must submit items (a) through (g), with signature by mail or electronically with scanned signatures. Items (h) and (i) shall be submitted electronically as an attachment to the PHA Plan.
 - (a) Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations
 - (b) Form HUD-50070, Certification for a Drug-Free Workplace (PHAs receiving CFP grants only)
 - (c) Form HUD-50071, Certification of Payments to Influence Federal Transactions (PHAs receiving CFP grants only)
 - (d) Form SF-LLL, *Disclosure of Lobbying Activities* (PHAs receiving CFP grants only)
 - (e) Form SF-LLL-A, Disclosure of Lobbying Activities Continuation Sheet (PHAs receiving CFP grants only)
 - (f) Resident Advisory Board (RAB) comments.
 - (g) Challenged Elements. Include any element(s) of the PHA Plan that is challenged.
 - (h) Form HUD-50075.1, Capital Fund Program Annual Statement/Performance and Evaluation Report (Must be attached electronically for PHAs receiving CFP grants only). See instructions in 8.1.
 - (i) Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan* (Must be attached electronically for PHAs receiving CFP grants only). See instructions in 8.2.

6.0 PHA Plan Update.

- **a.** The following elements of the Schuylkill County Housing Authority's (SCHA) plan elements have been revised since the Authority's prior submission:
 - Revised definition of Family in the Public Housing Admission and Occupancy Policy and Housing Choice Voucher Program Administrative Plan to comply with the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity rule (PIH 2014-20).
 - Revised the Violence Against Women Act (VAWA) policy in the Public Housing Admission and Continued Occupancy Policy and the Housing Choice Voucher Program Administrative Plan to comply with recent modifications that strengthen federal laws for the protection of victims of domestic violence, dating violence, sexual assault and stalking.
 - Revised Preferences in the Public Housing Admission and Occupancy Policy and Housing Choice Voucher Program Administrative Plan to comply with amendment to the Pennsylvania Housing Authority Law to provide a preference for veterans in each preference category.
 - Revised procedure in the Public Housing Admission and Occupancy Policy to comply with changes to the flat rent requirements of the Consolidated Appropriations Act of 2014 (HUD PIH 2014-12).
 - Incorporated the "No-Smoking Policy into the Public Housing Admission and Occupancy Policy.
 - Revised Administrative Plan HQS inspection process to allow for Biennial Inspections and revised HQS requirements to include Carbon Monoxide detectors in rental units to comply with Pennsylvania Law.
 - Revised the Administrative Plan Project Based Voucher process to permit the Housing Authority to issue PBVs to developments under the Low-Income Housing Tax Credit (LIHTC) program if no PBVs were committed by the Housing Authority to the development prior to the selection and award of tax credits to the project by the Pennsylvania Housing Finance;
 - Revised the Administrative Plan to promote the delivery of least-cost utility service through the acceptance of energy efficiency-based utility allowance schedule for projects that have been developed with energy efficient investments that support the delivery of higher quality low-income housing such as those developed using LIHTCs.

• Revised the Administrative Plan to limit the utility allowance payment for tenantbased vouchers to the unit size for which the voucher is issued, irrespective of the actual size of the unit rented by the family in compliance with the Consolidated Appropriations Act of 2014.

1. Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures:

Eligibility, Selection, and Admissions Policies.

<u>Affordable Housing Eligibility</u>. Sections of the Public Housing Admission and Occupancy Policy indicate the primary descriptions of the suitability and eligibility requirements for SCHA's conventional Affordable Housing Program (formerly known as the "Public Housing Program"). Eligibility requirements for the Affordable Housing Program include family and household criteria, income verification and limits criteria; citizenship and eligible immigration status; successful passage of criminal history, previous landlord and background screening; option for previous landlord checks; documentation of Social Security numbers; and consent authorization documents.

<u>Housing Choice Voucher Program Eligibility</u>. Sections of the Housing Choice Voucher Program (formerly known as "Section 8") Administrative Plan outline the eligibility, suitability, selection and admissions requirements for the Housing Choice Voucher Program (formerly known as "Section 8") Program ("HCVP"). Eligibility requirements for HCVP include: family and household criteria; income verification and limits criteria; citizenship and eligible immigration status; successful passage of criminal history; previous landlord and other background screening; documentation of Social Security numbers; and consent authorization documents.

<u>Other Selection Criteria</u>. SCHA selects resident families for its Affordable Housing, and participant families for its Housing Choice Program based on identified local preferences or selection criteria governing each bedroom size category or program goals all of which are based on the local housing needs and priorities. In addition to eligibility criteria, families must meet other SCHA screening criteria as outlined in the Admission and Occupancy Policy and Housing Choice Administrative Plan. All selections to and participation in the programs described above, are subject to the availability of an appropriately sized unit for the resident or participant family.

Deconcentration Procedures.

Selection Method of the Admission and Occupancy Policy explains that SCHA provides for deconcentration of poverty and encourages income mixing by ensuring that families are housed in a manner that will prevent, to the extent practicable, a concentration of poverty families and/or a concentration of higher income families in any one development. The specific objective of the SCHA is to house no less than 40% of its public housing inventory with families that have income at or below

30% of the area median income by public housing development. In addition, the SCHA will take reasonable actions to ensure that no individual development has a concentration of higher or lower income families in one or more of the developments.

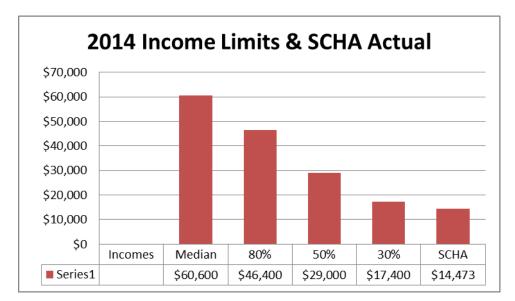
To accomplish the deconcentration goals, the SCHA contemplates taking the following actions:

- At the beginning of each SCHA fiscal year, the SCHA will establish a goal for housing 40% of its new admissions with families whose incomes are at or below the area median income. The annual goal will be calculated by taking 40% of the total number of move-ins from the previous SCHA fiscal year.
- Moreover, to accomplish the goals of deconcentration, to the extent practicable, SCHA annually will monitor the average income of all families residing in all of SCHA's covered developments to determine SCHA's progress in meeting its deconcentration goals and if appropriate, make modifications to address any concerns that arise from the monitoring analysis.

The Regulations indicate that, if all developments have average incomes between 85 and 115 percent of the overall average, then it is presumed that there is no need for further consideration. In the following table, the average incomes at 7 of the 9 developments are within 85 and 115 percent of the overall average and 2 are not. However, when we look at the averages for each AMP, we find that all 3 are within 85 and 115 percent of the overall average.

AMP 1	Average Income	% of Average
Shenandoah High Rise	\$15,086.00	104%
Shenandoah Family	\$17,174.00	119%
Ashland High Rise	\$12,406.00	86%
Average AMP 1	\$14,889.00	103%
AMP 2		
Minersville High Rise	\$12,624.00	87%
Cass-Minersville Family	\$15,812.00	109%
St. Clair Family	\$12,571.00	87%
Average AMP 2	\$13,669.00	94%
AMP 3		
Coaldale Elderly/Family	\$11,880.00	82%
Schuylkill Haven High Rise	\$14,920.00	103%
Schuylkill Haven Family	\$17,783.00	123%
Average AMP 3	\$14,861.00	103%
Average	\$14,472.89	

The implementing regulations further indicate that if the average incomes of all family developments are less than the Extremely Low Income level (30 percent of median), then no further action is required even if there is a substantial difference. The 2014 median income for Schuylkill County is \$60,600. Thirty (30) percent of the median is \$17,400. The average incomes of family developments are below 30 percent of the area median income. The average income of family occupants is 24 percent of the area median.



Waiting List Procedure.

Sections of the Admission and Occupancy Policy outline the SCHA Waiting List Procedure for affordable housing. The SCHA Affordable Housing Program maintains Site-Based Waiting Lists for each of its communities affordable housing communities. Interested persons may apply for admission to affordable housing at the SCHA development site management office to which they would like to apply.

SCHA maintains separate waiting lists for Housing Choice Voucher Program, as outlined in the Housing Choice Administrative Plan. Interested persons may apply for admission for Housing Choice assistance at the Housing Choice Department located at 245 Parkway, Schuylkill Haven when the applicable waiting list is open.

2. Financial Resources. The following statement of financial resources, includes a listing by general categories of the Housing Authority's anticipated resources, Operating, Capital and other anticipated Federal resources available to SCHA, as well as tenant rents and other income available to support public housing or tenant-based assistance:

HUD-50075

Financial Resources:						
Planned Sources and Uses						
Sources	Planned \$	Planned Uses				
1. Federal Grants (FY 2015 grants)						
a) Public Housing Operating Fund	\$1,525,867	Operating				
b) Public Housing Capital Fund (2015)	\$716,291	Capital/Operating				
c) HOPE VI Revitalization						
d) HOPE VI Demolition						
e) Annual Contributions for Section 8 Tenant-Based Assistance	\$2,527,518	HAP & Administration				
f) Resident Opportunity and Self- Sufficiency Grants						
g) Community Development Block Grant						
h) HOME						
Other Federal Grants (unobligated funds only) (list below)						
Capital Fund Program 2014	\$423,225	Cap Imp/Operating				
2. Prior Year Federal Grants (unobligated funds only) (list below)						
Capital Fund Program 2013	\$0	Cap Imp/Operating				
3. Public Housing Dwelling Rental Income	\$1,772,000	Operating				
Excess Utilities	\$101,500	Operating				
4. Other income (list below)						
5. Non-federal sources (list below)						
County Act 137 Funds	\$24,000	Affordable Housing				
Total Resources	\$7,090,401					

3. Rent Determination. The policies of SCHA governing rents charged for public housing and HCV dwelling units, have not been revised since the Authority's prior submission.

The Following is a Summary of SCHA's Rent Determination Policies [24 CFR Part 903.12(b), 903.7(d)]

A. Public Housing

(1) Income Based Rent Policies

The following describes SCHA's income based rent setting policy/ies for public housing using, including discretionary (that is, not required by statute or regulation) income disregards and exclusions:

Use of discretionary policies: SCHA does <u>not employ</u> any discretionary rentsetting policies for income-based rent in public housing. Income-based rents are set at the higher of 30% of adjusted monthly income, 10% of unadjusted monthly income, the welfare rent, or minimum rent (less HUD mandatory deductions and exclusions).

Minimum Rent: SCHA has established \$50.00 as a minimum rent and has adopted the following discretionary minimum rent hardship exemption policies:

- The family has lost eligibility for or is waiting an eligibility determination for a Federal, State, or local assistance program;
- The family would be evicted as a result of the imposition of the minimum rent requirement;
- The income of the family has decreased because of changed circumstance, including loss of employment;
- A death in the family has occurred; and
- Other circumstances determined appropriate and acceptable by the Housing Authority or the Department of Housing and Urban Development

SCHA does not plan to charge rents at a fixed amount or percentage less than 30% of adjusted income.

Rent re-determinations: Tenants must report changes in income or family composition to SCHA any time the family experiences such changes that may result in an adjustment to rent. Any time a family experiences an income increase above the following threshold amount: interim increase in rent due to a change in income shall only be implemented when the total annual gross income increases three thousand five hundred dollars (\$3,500) or more, except:

(1) if a new member is added to the lease, an adjustment will be made regardless of the amount of income; or

(2) if a tenant paying a minimum rent (\$50) obtains income from any source, an adjustment will be made regardless of the amount of income.

SCHA does not plan to implement individual savings accounts for residents (ISA) as an alternative to the required 12 month disallowance of earned income and phasing in of rent increases in the next year.

(2) Flat Rents: In setting the market-based flat rents, SCHA utilizes the Flat Rents approved by the Board which is based on a percentage of the current FMRs to establish a flat rent for each development.

SCHA has established the Flat Rents for the Public Housing Program effective November 1, 2014 for all new admissions and annual reexaminations with an effective date of December 1, 2014 as follows:

FY 2015 Flat Rents By Occupancy and Unit Bedrooms							
		Efficiency		Two- Bedroom	Three- Bedroom	Four- Bedroom	Five- Bedroom
ALL Units	SCHA	\$383	\$494	<u>\$643</u>	\$882	\$888	\$1,021

B. Section 8 Tenant-Based Assistance

(1) Payment Standards: SCHA's payment standard amended for 2015 effective November 1, 2014 for all new HCV payment contracts an annual reexaminations with an effective date of December 1, 2014 as compared to the HUD published Fair Market Rents (FMR) for the Schuylkill County are as follows:

PAYMENT STANDARDS-EFFECTIVE 11/1/2014 Final FY 2015 FMRs By Unit Bedrooms						
	Efficiency	One- Bedroom	Two- Bedroom	Three- Bedroom	Four- Bedroom	Five- Bedroom
FY 2015 FMR	\$383	\$494	\$643	\$882	\$888	\$1,021
Payment Standard	\$383	\$494	\$635	\$834	\$856	\$ 984

The payment standards are reevaluated annually by SCHA for adequacy. SCHA will consider the success rates of assisted families in locating and leasing affordable housing that meets HQS in its assessment of the adequacy of its payment standard.

(2) Minimum Rent: SCHA has established \$50.00 as the minimum rent for the Section 8 Voucher Program.

SCHA has adopted the following discretionary minimum rent hardship exemption policies:

- the family has lost eligibility for or is awaiting an eligibility determination for a Federal, State, or local assistance program;
- the family would be evicted as a result of the imposition of the minimum rent requirement;
- the income of the family has decreased because of changed circumstance, including loss of employment;
- a death in the family has occurred; and
- other circumstances determined appropriate and acceptable by the Housing Authority or the Department of Housing and Urban Development .
- **4. Operation and Management.** A statement of the rules, standards, and policies of the Schuylkill County Housing Authority governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of SCHA and programs of SCHA are available to the public at the main office of the Authority.
- 5. Grievance Procedures. The policies of SCHA governing the grievance and informal hearing and review procedures that the Housing Authority makes available to its residents and applicants, have not been revised since the Authority's prior submission.
- 6. Designated Housing for Elderly and Disabled Families. With respect to public housing projects owned, assisted, or operated by SCHA, there are no projects (or portions thereof), in the upcoming fiscal year, that the Housing Authority has designated or will apply for designation for occupancy by elderly and disabled families.
- 7. Community Service and Self-Sufficiency. A description of: (1) Any programs relating to services and amenities provided or offered to assisted families; (2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS; (3) How the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. (Note: applies to only public housing).

Policy Overview

Community Service is defined as "the performance of voluntary work or duties that are a public benefit, and that serve to improve the quality of life, enhance resident self-sufficiency, or increase resident self-responsibility in the community." Community Service is not employment and may not include political activities.

The Community Service and Economic Self-Sufficiency requirements mandate that each non-exempt adult household member (18 years or older), shall either contribute eight hours per month of community service within their community, or participate in an Economic Self-Sufficiency program for eight hours per month. This Chapter provides SCHA's requirements.

Community Service Contributions

Federal regulations mandate that all adult residents must contribute eight (8) hours per month of community service, or participate in an economic self-sufficiency program for eight (8) hours per month as a condition for continued public housing assistance.

The exceptions to this requirement are for person(s) that are:

- Elderly
- Blind or disabled as defined under law and unable to comply with the community service requirement, or the caretaker of such an individual.
- Working or exempted from work by the State.
- Receiving assistance and not in noncompliance with State or TANF requirements.

Persons with a disability are not automatically exempt from community service requirements. A person is exempt only to the extent the disability makes the person "unable to comply."

Community Service Activities

The Authority will strive to give residents the greatest choice possible of community service activities. These activities could include, but are not limited to:

- Improving the physical environment of the resident's development.
- Volunteer work in a local school, hospital, childcare center, homeless shelter, etc.
- Working with youth organizations.
- Helping neighborhood groups on special projects.
- Participation in programs that develop and strengthen resident self responsibility such as drug and alcohol abuse counseling and treatment, household budgeting and credit counseling, and English proficiency.

Federal regulations specifically prohibits political activity as community service.

Housing Authority Options for Community Service: The Authority can administer its own community service program, with cooperative relationships with other entities, or contract the entire community service program to a third party, which includes qualified resident councils.

The Authority must follow procurement policies and 24 CFR 85.36 in order to contract out the community service program. When third party contractors are used, the Authority will strive to ensure the contractor doesn't have a financial interest in where participants are assigned.

The Authority will ensure that all community service programs are accessible for persons with disabilities, and determine as well as possible, the work being performed is not hazardous.

Documentation: Reasonable documentation must verify the community service, and must be placed in the resident's file at time of reexamination.

Noncompliance: The Authority will determine if non-exempt residents are in compliance. If a family is found to be non-compliant, the non-compliant adult and the head of household must sign an agreement to make up the hours within the next three to 12-month period.

- 8. Safety and Crime Prevention. For public housing only, describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must include: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities.
 - 1. Local police provide up to date information regarding criminal activity on or near the public housing developments
 - 2. Police cooperation with SCHA in hearings involving drugs and other criminal activities
 - 3. Police cooperate with state and federal (OIG) for local drug and fraud cases involving housing participants
 - 4. Police inform SCHA of registered sex offenders
 - 5. SCHA has installed exterior and interior camera security system in elderly and family complex
- 9. Pets. SCHA's policies and requirements pertaining to the ownership of pets in public housing, have not been revised since the Authority's prior submission.

10. **Civil Rights Certification.** SCHA certifies that it will carry out the public housing program of the agency in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing. SCHA has adopted policies that promote non-discrimination, as outlined in Sections of the Admission and Occupancy Policy and of the Housing Choice Administrative Plan. In accordance to Civil Rights Laws, SCHA prohibits discrimination on the basis of race, color, sex, age, religion, national origin, disability, handicap, and family status. SCHA policies ensure consistent application of program rules, services, and procedures for all applicants and participants. Further, SCHA ensures that persons with disabilities are provided reasonable accommodation, as described by Section 504 of the Rehabilitation Act of 1973, Fair Housing Amendments Act of 1988, and Title II of the Americans with Disabilities Act of 1990.

Analysis of Impediments to Fair Housing Choice.

SCHA reviews its policies, at least annually, to identify any impediments to fair housing choice within the programs administered. When it is found that impediments exist, the SCHA revises its policies, redesigns the applicable procedures, and provides training to the staff to address and manage areas of concern or potential exposure.

Affirmatively Further Fair Housing.

SCHA is part of a community partnership which works with the County and advocacy organizations affirmatively to further fair housing by providing training and guidance within the locality. Information is disseminated county-wide utilizing local newspapers, radio, television, and other local media. To support the County's commitment to non-discrimination and equal opportunity in housing, the SCHA makes special efforts to assure that housing programs assisted with federal or local funds are made widely known throughout the community.

SCHA affirmatively markets to races and ethnicities shown to have disproportionate housing needs through local service providers. To provide applicants with an alternative form of communication, the SCHA procures services, if necessary from a qualified sign language interpreter, as well as have written materials explained orally by staff either in person or by telephone.

The County reviews SCHA's Agency plan to ensure consistency with the County's Consolidated Plan and the Pennsylvania Department of Community and Economic Development reviews the Annual Plan to ensure consistency with the Commonwealth's Consolidated Plan.

- **11. Fiscal Year Audit.** In the opinion of Francis J. McConnell, CPA, who conducted an independent audit of the Housing Authority as of March 31, 2014, "In my opinion, Schuylkill County Housing Authority complied, in all material respects, with the compliance requirements...that could have a direct and material effect on each of its major federal programs for the year ended March 31, 2014."
- **12. Asset Management.** A statement of how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory.

The Schuylkill County Housing Authority has adopted an asset management philosophy that seeks to maximize the value of its assets, and guides all decisions for its financial well-being as well as its clients. The Housing Authority's transformation to asset management, include the following:

II. ASSET MANAGEMENT PLAN

- 1. **Financial Assessment:** Prepare financial assessments of each property based on actual income, repair costs, administrative expenses and utility costs. Monitor income, expenses, and cash flows to track trends in financial performance.
- 2. **Historical Operating Analysis:** Maintain and analyze the historical operating results for each of the Authority's asset management properties. Compare the financial performance of each asset management property with indicators from comparable properties in the affordable housing industry. Analyze trends if the property is losing money and develop solutions.
- 3. Physical Needs Assessment: Utilize the recently completed comprehensive Physical Needs Assessment to cure deferred maintenance and physical deterioration. The assessment addresses remaining useful short life components. The PNA identifies functional obsolescence, both curable and incurable and provides information that will assist in the scheduling of future capital expenditures and replacements.
- 4. Viability Analysis: SCHA performed a portfolio evaluation to determine the most appropriate use of each site. Portfolio evaluation is a major asset management planning tool. The Viability Analysis provides SCHA with key benefits to: integrate the physical and financial characteristics of the housing with market conditions to develop highest and best use; evaluate alternative treatments and strategies in light of available resources; and prioritize future actions and clarify strategies going forward.
- 5. Energy Performance Audit: Utilize the recently completed Energy Performance Audit of each of SCHA's public housing developments to reduce utility costs by implement energy cost savings recommendations. Areas addressed in the energy performance audit findings include: reduce operating costs by updating and upgrading the HVAC systems, installing additional insulation and weather stripping where indicated, and installing energy efficient windows, replacing inefficient and wasteful shower heads,

faucets, toilets, etc. and revamping lighting and electrical systems with energy/cost saving alternatives.

III. PERFORMANCE EXCELLENCE

- 1. **Public Housing:** Maintain "High Performer" status under HUD's Public Housing Assessment System (PHAS). Ensure that SCHA properties continue to be managed to the highest possible standards, including thorough and uniform applicant eligibility determination, fair lease enforcement, regular preventative maintenance, prompt responses to maintenance work orders, full occupancy and timely turnover of vacant units, timely and accurate reporting of financial data, and all other components of quality property management and maintenance. Continue implementing "project-based accounting" as required by the new Public Housing Operating Fund rule. Continue to advocate for full funding and program reform.
- Section 8 Housing Choice Vouchers: Maintain "High Performer" status under HUD's Section 8 Management Assessment Program (SEMAP). Maintain high utilization of vouchers and budget without exceeding authorized limits. Continue to advocate for full voucher funding and program reform.
- 3. **Capital Improvements:** Continue renovating public housing properties and making capital improvements which promote fire safety and life safety as well as preserve the asset. Maintain high quality and timely design, bidding and construction. Continue to actively involve residents, staff and the community in planning capital improvements.

IV. EMPLOYEE AND ORGANIZATIONAL DEVELOPMENT

- 1. **Equal Opportunity and Diversity:** Promote and enforce equal employment opportunity and affirmative action. Attract and retain a diverse and qualified work force. Manage workplace diversity by fostering respect for and valuing of diversity.
- Employee and Organizational Development: Promote education, growth and advancement of employees through career planning, training opportunities and other resources. Continue internal rethinking strategies to promote organizational development, continuous improvement, and appropriate responses to budget challenges and program changes.
- 3. **Safety and Security:** Maintain safety and security at all SCHA housing and work sites for residents, staff and the public. Promote non-violence in all aspects of the SCHA's work. Continue making physical improvements to properties that enhance safety and security.

V. RESPECTED AND RESPONSIVE COMMUNITY PARTNER

- 1. **Fair Housing:** Work cooperatively with community representatives and other units of government to ensure non-discrimination in SCHA programs and to affirmatively further fair housing objectives. Promote the value of diversity and respect for differences.
- Linking Residents to Community Services: Promote links to community services through SCHA Community Centers and at other sites to meet the changing needs of SCHA residents, focusing on programs and services that enrich residents' lives, promote independence, increase community involvement and support successful tenancies in

public housing. Continue and promote transitional housing and other assisted living programs.

- 3. **Housing Preservation and Development:** Work with other agencies and organizations to preserve, develop, and/or manage affordable housing and other cooperative and entrepreneurial efforts. Seek out opportunities to produce additional affordable housing with federal resources (such as Replacement Vouchers) and/or other methods.
- 4. Leadership Responsibilities: Continue to advocate for full funding and program reform, including additional reform to HUD's "Asset Management" guidance. Continue to provide assistance to other housing authorities and organizations seeking organizational development, business systems, or program support.

13. Violence Against Women Act (VAWA).

Purpose and Applicability

Notwithstanding its title, this policy is gender-neutral, and its protections are available to males who are victims of domestic violence, dating violence, or stalking as well as female victims of such violence.

The purpose of this policy (herein called "Policy") is to implement the applicable provisions of the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162) and more generally to set forth SCHA's policies and procedures regarding domestic violence, dating violence, and stalking, as hereinafter defined.

This Policy shall be applicable to the administration by SCHA of all its federally subsidized public housing and Section 8 rental assistance programs under the United States Housing Act of 1937 (42 U.S.C. §1437 *et seq.*).

Goals and Objectives

This Policy has the following principal goals and objectives:

- A. Maintaining compliance, including training of appropriate staff managing SCHA properties, with all applicable legal requirements imposed by VAWA;
- B. Participating, with others, in protecting the physical safety of victims of actual or threatened domestic violence, dating violence, or stalking who are assisted by SCHA;
- C. Providing and maintaining housing opportunities for victims of domestic violence, dating violence, or stalking;
- D. Cooperating, with others, in formation and maintenance of collaborative arrangements between SCHA, law enforcement authorities, victim service providers, and others to promote the safety and well- being of victims of actual and threatened domestic violence, dating violence and stalking, who are assisted by SCHA; and
- E. Responding in accordance with SCHA policies and procedures to incidents of domestic violence, dating violence, or stalking, affecting individuals assisted by SCHA.

In addition, SCHA works in cooperation with the following agencies:

Schuylkill Women in Crisis

The Schuylkill Women in Crisis a private, non-profit organization to provide services to victims of domestic violence in Schuylkill County.

In addition to assisting victims, this agency is working to confront the societal issues that contribute to this problem. The agency provides services to all individuals regardless of gender, especially women and children who are most vulnerable to this problem. These services include, but are not limited to:

- Counseling for individuals and groups related to domestic violence for adults and children.
- Emergency shelter to victims of domestic violence and their children.
- Transitional housing to assist women in becoming socially and economically independent.
- Legal representations, systems advocacy, and courtroom accompaniment for victims of domestic violence.
- 24-hour crisis hotline.
- Community education and prevention presentations.
- Systems advocacy with local policy makers to improve system response to victims.

Schuylkill County Children and Youth Services

SCHA works with the County Children and Youth Services Office to provide the necessary services to help preserve the family unit. The agency will provide temporary, alternative living arrangements for children when necessary, while providing services directed at reunification of troubled families. The Agency's primary concern while providing all services is the safety and well being of the child.

The Children and Youth Agency provides service to children and families. The Agency offers both In-Home and Placement services.

IN-HOME SERVICES: Service Planning, General Protective Services (Child Abuse), Day Treatment (Operation Plus Program), Homemaker Services, (Individual, Family and Group), Therapeutic Intervention for Families (TIF) and Independent Living Services.

PLACEMENT SERVICES: Foster Care (Specialized and Traditional), Group Home Services (Cloud Home), Contracted Services (Foster, Group and Facility), Adoption Services, Emergency Shelter Services.

Victim-Witness Services, Schuylkill County District Attorney's Office

The Housing Authority also works in partnership with Schuylkill County District Attorney's Office, Victim-Witness Services that offers information on Victims' Rights and Services in the Criminal Justice System and in the Community.

The Schuylkill County Victim/Witness Assistance Program provides services to all victims and witnesses of crime who request such, in accordance and compliance with

the Pennsylvania Crime Victims "Bill of Rights," Act 111 of 1998 and the Standards set forth by the Pennsylvania Commission on Crime and Delinquency. The Victim/Witness Assistance Program's goal is to treat all victims and witnesses with respect and dignity and to encourage and support their participation in the criminal justice system to the level and extent they choose however possible.

Definitions as Used in the Violence Against Women Act

The definitions applicable to the Violence Against Women Act (VAWA) are the following:

Domestic Violence: felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, a person with whom the victim shares a child, a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, 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 who committed a crime against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction

Dating Violence: violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim and the existence of such a relationship is determined based on the following factors: length of the relationship, type of relationship, and frequency of interaction between the persons involved in the relationship

Stalking: engaging in a course of conduct directed at a specific person causing a reasonable person to fear for his or her safety or others or suffer substantial emotional distress.

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

Affiliated Individual:

- A spouse, parent, brother or sister, or child of that person, or an individual to whom that person stands in the position or place of a parent; or
- Any other person living in the household of that person and related to that person by blood and marriage.

Prohibition Against Denial of Assistance to Victims of Domestic Violence, Dating Violence, Stalking, and Sexual Assault

Applicants who otherwise qualify for assistance or admission will not be denied admission on the basis that the applicant is or has been a victim of domestic violence, dating violence, stalking, or sexual assault. VAWA does not limit SCHA's authority to deny assistance to an individual or family that is not otherwise qualified or eligible for assistance

Prohibition against Termination of Assistance Related to Victims of Domestic Violence, Dating Violence, Stalking, and Sexual Assault

Criminal activity directly relating to domestic violence, dating violence, stalking, or sexual assault engaged in by a member of a tenant's household or any guest or other person under the tenant's control will not be the basis for termination of assistance, tenancy, or occupancy

rights if the tenant or an immediate member of the tenant's family is the victim or threatened victim of that domestic violence, dating violence, or stalking.

Incidents of actual or threatened domestic violence, dating violence, stalking, or sexual assault will not be construed either as serious or repeated violations of the lease by the victim of such violence or as good cause for terminating the tenancy or occupancy rights of the victim of such violence.

Notwithstanding the foregoing, SCHA may exercise its authority to evict, remove, terminate occupancy rights, or terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others, without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is also a tenant or lawful occupant. Further, SCHA retains its authority to terminate the tenancy of any tenant if SCHA concludes that there is an actual and imminent threat to other tenants or those employed at or providing service to the property if that tenant is not evicted or terminated from assistance. VAWA does not limit SCHA's authority to deny or terminate assistance to an individual or family that is not otherwise qualified or eligible for assistance.

SCHA Confidentiality Requirements – VAWA

All information provided to SCHA regarding domestic violence, dating violence, or stalking, including the fact that an individual is a victim of such violence, stalking, or sexual assault must be retained in confidence and may neither be entered into any shared database nor provided to any related entity, except to the extent that the disclosure is:

- Requested or consented to by the individual in writing;
- Required for use in an eviction proceeding; or
- Otherwise required by applicable law.

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

Notification to Applicants and Tenants Regarding Protections Under VAWA

SCHA will provide applicants and tenants with the notifications described in this section of their protections and rights under VAWA.

SCHA will include in all notices of denial a statement explaining the protection against denial provided by VAWA.

SCHA will include in all lease termination notices a statement explaining the protection against termination or eviction provided by VAWA.

SCHA acknowledges that a victim of domestic violence, dating violence, stalking, or sexual assault may have an unfavorable history (i.e., a poor credit history, non-payment of rent as a Public Housing tenant, a record of previous damage to an apartment/Public Housing unit, a prior/current arrest record) that would warrant denial or termination under SCHA's policies. Therefore, if SCHA makes a determination to deny admission to an applicant family or terminate assistance to a resident family, SCHA will include in its notice of denial/termination:

- A statement of the protection against denial provided by VAWA;
- A description of SCHA confidentiality requirements; and
- A request that an applicant/head of household wishing to claim this protection submit to SCHA documentation meeting the specifications outlined in this ACOP with a request for an informal hearing or grievance hearing, whichever is applicable.

Victim Documentation – Denials and Terminations

An applicant claiming that the cause of an unfavorable history is that a member of the applicant family is or has been a victim of domestic violence, dating violence, stalking, or sexual assault must provide documentation:

- Demonstrating the connection between the abuse and the unfavorable history; and
- Naming the perpetrator of the abuse.

When a family is facing assistance termination because of the actions of a tenant, household member, guest, or other person under the tenant's control and a participant or immediate family member of the tenant's family claims that she or he is the victim of such actions and that the actions are related to domestic violence, dating violence, stalking, or sexual assault. SCHA will require the individual to submit documentation affirming that claim.

SCHA will require a completed HUD Form 91066 and one of the following for certification of a claim:

• A Federal, State, tribal or territorial or local police or court record; or

• Documentation signed by an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, from whom the victim has sought assistance in addressing domestic violence, dating violence, stalking, or sexual assault or the effects of abuse, in which the professional attests under penalty of perjury under 28 U.S.C. 1746 to the professional's belief that the incident or incidents in question are bona fide incidents of abuse, and the victim of domestic violence, dating violence, stalking, or sexual assault has signed or attested to the documentation.

Individuals or families claiming that they are a victim of domestic violence, dating violence or stalking may obtain a HUD Form 91066 from designated SCHA locations.

Time Frame for Submitting Documentation—Applicant

The applicant must submit the required documentation with her or his request for an informal hearing within ten (10) business days of SCHA's notification of denial of admission or must request an extension in writing at that time. If the applicant so requests, SCHA will grant an extension of ten (10) business days, and will postpone scheduling the applicant's informal hearing until after it has received the documentation or the extension period has elapsed. If after reviewing the documentation provided by the applicant SCHA determines that the family is eligible for assistance, no informal hearing will be scheduled and SCHA will proceed with admission of the applicant family.

Time Frame for Submitting Documentation—Tenant

The tenant must submit the required certification and supporting documentation to SCHA within fourteen (14) business days after SCHA issues the Notice of Lease Termination. The 14-day deadline may be extended at SCHA's discretion. If the individual does not provide the

required certification and supporting documentation within fourteen (14) business days, or within the approved extension period, SCHA may proceed with denial or termination of assistance.

If SCHA can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property if the participant's tenancy is not terminated, SCHA will bypass the standard process and proceed with the immediate termination of the family's assistance.

Perpetrator Documentation

If the perpetrator of the abuse is a member of the applicant/resident family, the applicant/Head of Household must provide additional documentation consisting of one of the following:

• A signed statement requesting that the perpetrator be removed from the application or household and certifying that the perpetrator will not be permitted to visit or to stay as a guest in the assisted unit; or

• Documentation that the perpetrator has successfully completed, or is successfully undergoing, rehabilitation or treatment. The documentation must be signed by an employee or agent of a domestic violence service provider or by a medical or other knowledgeable professional from whom the perpetrator has sought or is receiving assistance in addressing the abuse. The signer must attest under penalty of perjury to his or her belief that the rehabilitation was successfully completed or is progressing successfully. The victim and perpetrator must also sign or attest to the documentation.

Perpetrator documentation must be submitted to SCHA within the same timeframe as victim documentation.

Terminating Tenancy of a Domestic Violence Offender

This section does not provide protection for perpetrators of domestic violence, dating violence or stalking. SCHA may terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others without terminating assistance to, or otherwise penalizing the victim of such violence who is also a tenant or lawful occupant. This authority supersedes any local, State, or other Federal law to the contrary. However, if SCHA chooses to exercise this authority, SCHA will follow any procedures prescribed by HUD or by applicable local, State, or Federal law regarding termination of assistance. When the actions of a participant or other family member result in a decision to terminate the family's assistance and another family member claims that the actions involve criminal acts of physical violence against family members or others, SCHA will request that the victim submit the required certification and supporting documentation in accordance with the stated timeframe. If the certification and supporting documentation are submitted within the required timeframe, SCHA may bifurcate a lease in order to evict, remove, or terminate assistance to any individual who is a tenant or lawful occupant of the housing and who engages in criminal activity directly related to domestic violence, dating violence, sexual assault, and stalking against a victim or affiliated individual. If the victim does not provide the certification and supporting documentation, as required, SCHA will proceed with termination of the family's assistance.

If SCHA can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property if the participant's tenancy is not terminated, SCHA will bypass the standard process and proceed with the immediate termination of the family's assistance.

14. EIV Security Policy Introduction:

On December 29, 2009, HUD issued the final rule entitled *Refinement of Income and Rent Determination Requirements in Public and Assisted Housing Programs: Implementation of the Enterprise Income Verification (EIV) System-Amendments*, which requires Public Housing Authorities (PHAs) to use the EIV system in its entirety to verify tenant employment and income information during mandatory reexaminations of family composition and income; and reduce administrative and subsidy payment errors in accordance with 24 CFR §5.236 and administrative guidance issued by HUD.

Using EIV as an upfront income verification (UIV) technique will be valuable in validating tenantreported income during interim and annual reexaminations of family income; as well as streamlining the income verification process. This will result in less administrative burden in complying with third party verification requirements. Additionally, EIV will help to identify and cure inaccuracies in housing subsidy determinations, which will benefit PHAs, tenants, and taxpayers by ensuring that the level of benefits provided on behalf of families is proper and will prevent fraud and abuse within Public and Indian Housing (PIH) rental assistance programs.

Purpose:

The purpose of this policy is to provide instruction and information to the Schuylkill County Housing Authority's (SCHA) staff, auditors, consultants, contractors and tenants on the acceptable use, disposition and storage of data obtained through EIV (Enterprise Income Verification System).

The purpose of EIV is to assist the HUD, and the SCHA staff, auditors, consultants, contractors and tenants in streamlining the income verification process and to help in minimizing the need for 3rd party verification. EIV allows the user to identify:

- a. tenants whose reported personal identifiers do not match the SSA database;
- b. tenants who need to disclose a SSN;
- c. tenants whose alternate identification number (Alt ID) needs to be replaced with a SSN;
- d. tenants who may not have reported complete and accurate income information;
- e. tenants who have started a new job;
- f. tenants who may be receiving duplicate rental assistance;
- g. tenants who are deceased and possibly continuing to receive rental assistance;
- h. former tenants of PIH rental assistance programs who voluntarily or involuntarily left the program and have a reportable adverse status and/or owe money to a PHA or Section 8 landlord.

In addition, information in EIV can be used to provide more comprehensive oversight to compliance policies and their implementation. The data provided via EIV system will be protected to ensure that it is only used for official purposes and not disclosed in any way that would violate the privacy of the individuals represented in the system data. Privacy of data and data security for computer systems are covered by a variety of federal laws and regulations, government bulletins, and other guiding documents.

Safeguarding EIV Data

The information processed by any EIV system can include wage and income data about private individuals, as well as identifying information such as Social Security Number, Address, and Employment information. This policy describes methods to comply with HUD's required EIV safeguards.

Technical safeguards

- 1. Reduce the risk of a security violation related to the EIV system's software, network, or applications.
- 2. Identify and authenticate all users seeking to use the EIV system data.
- 3. Deter and detect attempts to access the system without authorization.
- 4. Monitor the user activity on the EIV system.

Administrative safeguards

- 1. Ensure that access rights, roles, and responsibilities are appropriately and adequately assigned.
- 2. Protect copies of sensitive data and destroy system-related records to prevent reconstruction of the contents.
- 3. Ensure authorized release of tenant information consent forms are included in all family files, before accessing and using data.
- 4. Maintain, communicate, and enforce standard operating procedures related to securing EIV data.
- 5. Train staff on security measures and awareness, preventing the unauthorized accessibility and use of data.

Physical safeguards

- 1. Establish barriers between unauthorized persons and documents or computer media containing private data.
- 2. Clearly identify restricted areas by use of prominently posted signs or other indicators.
- 3. Develop a list of authorized users who can access restricted areas-e.g., contractors, maintenance, and janitorial/cleaning staff.
- 4. Prevent undetected entry into protected areas and/or documents.
- 5. Notify Coordinators/Security Administrators of system breaches and penetration by unauthorized users.

Le-Ann Techentine will have the responsibility of ensuring compliance with the security policies and procedures outlined in this document. These responsibilities include:

- Maintaining and enforcing the security procedures
- Keeping records and monitoring security issues
- Communicating security information and requirements to appropriate personnel including coordinating and conducting security awareness training sessions
- Conducting review of all User ID's issued to determine if the users still have a valid need to access EIV data and taking necessary steps to ensure that access rights are revoked or modified as appropriate

 Reporting any evidence of unauthorized access or known security breaches to Le-Ann Techentine and taking immediate action to address the impact of the breach including but not limited to prompt notification to Le-Ann Techentine. Le-Ann Techentine will escalate the incident by reporting to appropriate parties including the Executive Director or HUD.

Limiting Access to EIV Data

User accounts for the EIV system will be provided on a need-to-know basis, with appropriate approval and authorization.

Security Awareness Training

Security awareness training is a crucial aspect of ensuring the security of the EIV System and data. Users and potential users will be made aware of the importance of respecting the privacy of data, following established procedures to maintain privacy and security, and notifying management in the event of a security or privacy violation. Before granting access to the EIV information, each person must be trained in EIV Security policies and procedures. Additionally, all employees having access to EIV Data will be briefed at least annually on the security policy and procedures that require their awareness and compliance. Information about user access and training will be maintained in the property EIV file.

EIV System Coordinators

Before accessing EIV, the Secure Systems Coordinators will obtain a letter from each property Housing Authority indicating that the Housing Authority gives permission for the Secure Systems Coordinator to act as the EIV coordinator. Once that permission is obtained, the Coordinator will review the EIV training material provided by HUD and complete the appropriate Security Awareness Training Questionnaire and review the EIV Security Policy and the EIV User Policy. Upon completion of these three tasks, the EIV Coordinator will submit, to HUD, the appropriate Coordinator Access Authorization Forms. Upon receipt of HUD approval, the EIV Coordinator will complete the EIV Coordinator setup process.

EIV Users

Before requesting EIV User access, appropriate staff will review the EIV training material provided by HUD and complete the appropriate Security Awareness Training Questionnaire and review the EIV Security Policy and the EIV User Policy. Upon completion of these three tasks, the EIV User will submit, to the EIV Coordinator, the appropriate User Access Authorization Form. Upon receipt the EIV Coordinator will review the completed Security Awareness Training Questionnaire for accuracy and recommend further training if necessary. If the EIV Coordinator feels that the EIV User candidate does not understand the security requirements, the EIV Coordinator will not continue with the EIV setup for that user.

Note: Under no circumstances will the EIV Coordinator process the User Access Authorization Form unless the executed Security Awareness Training Questionnaire, the signed EIV Security Policy and the signed EIV User Policy are attached.

Once the user request information is satisfactorily completed, the EIV Coordinator will complete the appropriate steps to provide EIV access to the user. In accordance with HUD requirements, the user's need for access will be reviewed on a quarterly basis.

At least once a year, staff with EIV access will be required to:

- Participate in training that includes a review of the EIV security policy and
- Complete the EIV Security Awareness Training Questionnaire

Schuylkill County Housing Authority will restrict access to EIV data only to persons whose duties or responsibilities require access. EIV Coordinators will be required to request recertification on an annual basis. EIV Coordinators are authorized to provide access only to those individuals directly involved in the resident certification process and/or compliance monitoring. EIV Coordinators will carefully review initial and quarterly requests for access and certify only those users who will need access within the next 90 days.

Schuylkill County Housing Authority will maintain a record of users who have approved access to EIV data. Further, Schuylkill County Housing Authority will revoke (Expire) the access rights of those users who no longer require such access or modify the access rights if a change in the user's duties or responsibilities indicates a change in the current level of privilege.

Schuylkill County Housing Authority will assure that a copy of Form-9886 has been signed by each member of the household age 18 years or older. The 9886 will be presented at move-in and/or initial certification. If a household member turns 18 in the middle of a certification cycle, that household member should sign Form 9886 within 7 days of turning 18. (See HUD 9886 Fact Sheet for exceptions due to extenuating circumstances) All HUD-9886's will be placed in a resident file and will be updated on an annual basis for each adult household member.

The HUD 9886 Fact Sheet will be provided to all adult household members required to sign the form. By signing this HUD Form 9886, the applicant/resident authorizes HUD and/or Schuylkill County Housing Authority to obtain and verify income and unemployment compensation information from various sources including. But not limited to the IRS, the Department of Health and Human Services and the Social Security Administration, current and former employers and state agencies.

User Names, Passwords and Password Changes

Many systems require frequent changes in passwords. Secure Systems/ EIV passwords will be changed in accordance with HUD Secure Systems requirements. Users will not share user names or passwords with any other employee or with anyone outside the organization. EIV access granted to an employee or authorized user will be revoked when access is no longer required or prior to termination of that employee or user to ensure data safety. Termination of EIV Access and un-assigning property access through "Property Assignment Maintenance" is required.

The EIV file will be documented to indicate when user access was terminated by the EIV Coordinator. Documentation of termination will be maintained in the property EIV file and in the employee's personnel file.

Computer System Security Requirements

All computer systems and computers will have password restricted access. Schuylkill County Housing Authority will also use Antivirus software to limit data destruction or unintended

transmission via virus, worms, Trojan horses or other malicious means. Remote access by other computers other than those specifically authorized is prohibited.

Authorized users of EIV data are directed to avoid leaving EIV data displayed on their computer screens where unauthorized users may view it. A computer will not be left unattended while the user is "logged in" to Secure Systems. If an authorized user is viewing EIV data and an unauthorized user approaches the work area, the authorized user will lessen the chance of inadvertent disclosure of EIV data by minimizing or closing out the screen on which the EIV data is being displayed.

Physical Security Requirements

Schuylkill County Housing Authority may use a combination of methods to provide physical security for resident file records. The EIV data may be maintained in a locked metal file cabinet within a locked file room.

Restricted Areas: Schuylkill County Housing Authority will have the areas clearly identified by the use of prominently posted signs or other indicators. For example "Employees Only". This sign will be posted on the door to the locked file room. The restricted areas will be separated from non-restricted areas by physical barriers that control access and/or will have limited points of entry.

Since the EIV data in resident files is maintained in the locked file room, **Le-Ann Techentine** will establish and maintain a key control log to track the inventory of keys available, the number of keys issued and to whom the keys are issued. All employees and contractors who have been issued keys to the file room will complete a form acknowledging the receipt of the key. See Appendix A.

Users will retrieve computer printouts as soon as they are generated so that EIV data is not left unattended in printers or fax machines where unauthorized users may access them. EIV data will be handled in such a manner that it does not become misplaced or available to unauthorized personnel.

Use and Handling of EIV Data

EIV Data serves two purposes:

- 1. Verification of specific income information provided by the resident
- 2. Monitoring resident and staff compliance

Use of the data is described in the EIV User Policies. This policy is designed to describe the security protocol used to protect EIV data.

EIV Printouts

Reports available through EIV will not be printed to a shared printer unless the EIV user plans to immediately retrieve the data. It is preferred that all EIV printouts are sent to the user's personal printer. EIV printouts will be stored in the resident file in a separate manila envelope. The Documentation of EIV Data will be included in the resident file. This entire file will be made available to authorized people including appropriate staff or contractors (i.e. Service Bureaus,

contractors performing file reviews, etc.) for Schuylkill County Housing Authority, HUD staff, Contract Administration staff and the Office of the Inspector General.

If other people are tasked with reviewing the file, such as financial auditors complying with the Consolidated Audit Guide (Handbook IG 2000.04), the EIV printout in the manila folder including the EIV printout will be removed from the file and the Documentation of EIV Data will remain in the file to provide appropriate information required by the file audit.

If a resident requests a copy of their own EIV printout, a copy will be produced. The staff person providing the copy will note that the printout is a copy provided to the resident upon request. This note will include the following:

- This is not an original, this is a copy provided to:______
- On _____, 20___
- By_____(name will be printed)
- Initials_____

The appropriate staff will make a note in the file any time a copy of the EIV data is obtained by authorized persons and taken off site. This includes copies provided to the applicant/resident, other internal staff, HUD, SCHA or OIG staff. Under no circumstances will the EIV information be provided to <u>anyone</u> other than those noted in this paragraph.

Other Language

Since site staff may not have access to the EIV database, Le-Ann Techentine is responsible for providing income verification and discrepancy information to the site. Information must be sent in such a way as to ensure the security of the data. Preferably, information will be sent electronically via email or via electronic fax. The email will be opened by the appropriate staff person, the information will be printed and the email will be immediately deleted from the recipient's email box.

If necessary, printouts will be produced by Le-Ann Techentine and sent express mail. In this case the recipient will be required to sign for the package to ensure that the information is delivered and there is no risk of disclosure to unauthorized persons.

Immediately upon receipt, the printouts will be filed and secured as appropriate.

Electronic Information from EIV

Under no circumstances should anyone save or scan EIV information to retain an electronic copy. In order to ensure compliance with HUD's security requirements, EIV information should only be produced in hard copy and maintained in accordance with the recordkeeping requirements outlined by HUD.

Alternative

In some cases, there may be a need to send or store EIV information electronically. If there is need to store the information on a hard drive, a specific folder will be created. The folder will be password protected to prevent unauthorized access. Information in the folder will be purged periodically to comply with HUD's EIV file retention policies.

If EIV information is copied to portable media (CD, DVD, tape, etc.) that portable media will be destroyed appropriately upon completion of the intended use.

Reporting Improper Disclosures

Recognition, reporting, and disciplinary action in response to security violations are crucial to successfully maintaining the security and privacy of the EIV system. These security violations may include the disclosure of private data as well as attempts to access unauthorized data and sharing of User ID's and passwords. Upon the discovery of a possible improper disclosure of EIV information or other security violation by an employee or any other person, the individual making the observation or receiving the information will contact the EIV Coordinator and Le-Ann Techentine who will document all improper disclosures in writing providing details including who was involved, what was disclosed, how the disclosure occurred, and where and when it occurred. The EIV Coordinator will immediately review the report of improper disclosure and, if appropriate, the EIV Coordinator will remove EIV access.

Improper disclosure of any information is grounds for immediate termination. All employees should carefully review the EIV Access Authorization Form to understand the penalties for improper disclosure of EIV data.

Disposal of EIV Information

EIV data will be destroyed in a timely manner based on the information provided in HUD's published EIV training materials, HUD notices or as prescribed by Schuylkill County Housing Authority's policy and procedures. Schuylkill County Housing Authority's policy and procedures will not allow data retention that is longer than the time allowed in the published HUD materials.

As necessary, all EIV originals will be shredded. Information about use of EIV information and how printouts were destroyed will be maintained in the resident file.

I have read and understand the EIV Security Requirements. I agree to abide by this policy and to report any improper disclosure of information.

Name (please print)

Signature

____/___/____ Date

CC: Personnel File Property EIV File

Note regarding properties with Tax Credit or 515 "layering": Neither the EIV Printout nor the Documentation of EIV Data will be provided to any Tax Credit or 515 Auditor since EIV may not be used to verify information for residents participating in those programs. Alternative verification documents must be used to verify income for Tax Credits or 515 programs. For Social Security and Medicare information, the resident file must include an SSA Benefit/Award letter. For employment income and unemployment income, the resident file should contain verification documents as provided in HUD Handbook 4350.3 Revision 1, Appendix 3.

9.0 Housing Needs

Housing Needs of Families in the Jurisdiction/s Served by SCHA

Based upon the information contained in the American Community Survey of 2011 applicable to the jurisdiction, and/or other data available to SCHA, provide a statement of the housing needs in the jurisdiction by completing the following table.

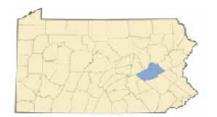
Subject	Schuylkill County, Pennsylvania		
	Occupied housing units	Owner-occupied housing units	
	Estimate	Estimate	
	60,018	46,013	
PAST 12 MONTHS (IN 2011 INFLATION-ADJUSTED DOLLARS)			
	1.9%	1.4%	
	3.0%	2.0%	
	6.9%	5.0%	
	7.0%	5.4%	
	8.2%	7.0%	
	11.5%	9.9%	
	13.6%	14.0%	
	22.0%	23.6%	
	13.4%	16.0%	
	8.9%	11.3%	
	3.7%	4.3%	
lollars)	47,437	55,234	
	0.1%	0.1%	
	1.6%	1.6%	
	5.6%	5.1%	
	10.3%	12.4%	
	11.6%	11.2%	
	12.4%	11.5%	
	11.7%	9.0%	
	8.6%	7.5%	
	6.1%	5.8%	
	3.7%	4.0%	
	14.7%	18.1%	
	6.4%	8.3%	
	4.1%	5.4%	
	3.2%	(X)	
	658	689	
AS A PERCENTAGE OF HOUSEHOLD INCOME IN THE PAST 12 MONTHS			
	16.7%	13.2%	
	1.1%	1.3%	
	3.7%	2.9%	
	11.9%	9.1%	

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18.9%	16.9%
4.7%	5.4%
6.7%	4.2%
7.6%	7.2%
13.1%	14.0%
7.1%	7.6%
4.0%	3.8%
2.1%	2.6%
21.3%	23.6%
14.9%	15.5%
3.9%	4.9%
2.5%	3.3%
25.7%	31.6%
19.8%	24.0%
4.9%	6.4%
1.0%	1.3%
1.0%	0.6%
3.2%	(X)
0.7%	(X)
(X)	32.0%
(X)	(X)

Sources for information: U.S. Census Bureau, 2011, American Community Survey Data

Schuylkill County



Housing Characteristics

Household Income

Percent of Total Households							
Annual Income 2000 2006-2010							
Less than \$10,000	11.3%	7.2%					
\$10,000 to \$24,999	26.8%	22.0%					
\$25,000 to \$49,999	32.9%	29.0%					
\$50,000 to \$99,999	24.5%	31.2%					
\$100,000 to \$199,999	3.5%	9.9%					
\$200,000 or more	0.9%	0.7%					

Year	Households	Owner- Occupied Households	Renter- Occupied Households	Homeownership Rate	Median Year Structure Built	Housing Units per Sq. Mile	Persons per Household
2000	60,530	47,198	13,332	78.0%	1940	87.1	2.36
2010	60,192	45,496	14,696	75.6%	1940	89.0	2.35

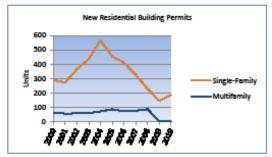
Housing Affordability

	Rental Housing				Homeownership			
Year(s)	Median	2-Bedroom			Year(s)	Median	Median	Affordable Home
	Renter	Gross Rent				Household	Home	Cost
	Income	Estimate	Apartment			Income	Value	
2000	\$19,372	\$449	27.8%		2000	\$32,580	\$63,900	\$95,719
2006-2010	\$22,876	\$539	28.3%		2006-2010	\$42,315	\$88,400	\$151,298

	Housing Affordability by Select Occupation									
	2000			2006-2010						
Occupation	Median Annual Pay	% of income to Rent 2-Bedroom Apartment	Affordable Home Cost	Median Annual Pay	% of Income to Rent 2-Bedroom Apartment	Affordable Home Cost				
Licensed Practical Nurse	\$26,177	20.6%	\$72,798	\$36,570	17.7%	\$125,363				
Police Officer	\$26,409	20.4%	\$73,629	\$47,059	13.7%	\$172,714				
Elementary School Teacher	\$46,680	11.5%	\$146,191	\$46,343	14.0%	\$169,482				
Retail Salesperson	\$14,771	36.5%	\$31,969	\$22,390	28.9%	\$61,350				

Red indicates the amount a homebuyer can afford to spend on a home is less than the county median home value, or rent that exceeds 30 percent of a renter's income.

Housing Availability



Percent of Population 65 and Over						
2000 2010 2020 2030						
19.9%	17.4%	19.7%	23.8%			

Number of				
Unconventional				
Gas Wel	Gas Wells Drilled			
2009	2010			
0 0				



Housing Needs of Families on the Public Housing Waiting Lists

The following table represents the characteristics of the families on the Public Housing Waiting List for Schuylkill County:

Housing Nee	Housing Needs of Families on the Waiting List Public Housing						
	# of families	U	Annual Turnover				
Waiting list total	291		103				
Extremely low income <= 30% AMI	211	73%					
Very low income (>30% but <=50% AMI)	65	22%					
Low income (>50% but <80% AMI)	15	5%					
Families with children	111	38%					
Elderly families	53	18%					
Families with Disabilities	101	35%					
Nondisabled, nonelderly, no children	77	26%					
White – Non-Hispanic	250	86%					
White – Hispanic	20	7%					
Black – Non-Hispanic	18	6%					
Black – Hispanic	3	1%					
Characteristics b	y Bedroom Siz	e (Public Housing O	nly)				
0 BR	26	9%	28				
1BR	136	47%	26				
2 BR	79	27%	16				
3 BR	43	15%	29				
4 BR	6	2%	3				
5 BR	1	<1%	1				
5+ BR	0	0	0				

Housing Needs of Families on the Section 8 Tenant- Based Assistance Waiting Lists

Housing Needs of Families on the Waiting List Section 8 tenant-based assistance						
	# of families	% of total families	Annual Turnover			
Waiting list total	530		79			
Extremely low income <=30% AMI	313	59%				
Very low income (>30% but <=50% AMI)	206	39%				

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Low income (>50% but <80% AMI)	11	2%	
Families with children	310	58%	
Elderly families	37	7%	
Families with Disabilities	132	25%	
Nondisabled, nonelderly, no children	114	22%	
White – Non- Hispanic	389	73%	
White - Hispanic	52	9%	
Black – Non- Hispanic	74	14%	
Black - Hispanic	10	2%	
Multi-racial – Non- Hispanic	1	<1%	
Asian –Non- Hispanic	2	<1%	
Native Hawaiian/Other Pacific Islander- Hispanic	1	<1%	
Multi-Racial- Hispanic	1	<1%	

9.1 Strategies to Meet Housing Needs

SCHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year is described below:

To maximize the number of affordable housing units available to SCHA within its current resources, SCHA plans to:

- Employ effective maintenance and management policies to minimize the number of affordable housing units off-line.
- Reduce turnover time for vacated affordable housing units.
- Reduce time to renovate affordable housing units.
- Seek other affordable housing units through mixed finance development.
- Seek affordable housing units utilizing Housing Choice Voucher resources.
- Maintain or increase Housing Choice Voucher lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction.
- Undertake measures to ensure access to affordable housing among families assisted by the SCHA, regardless of unit size required.
- Maintain or increase Housing Choice Voucher lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration.
- Maintain or increase Housing Choice Voucher lease-up rates by effectively screening Housing Choice Voucher applicants to increase owner acceptance of program

To increase the number of affordable housing units, the SCHA plans to:

- Apply for additional Housing Choice Voucher units should they become available.
- Leverage affordable housing resources in the community through the creation of mixed- finance housing.
- Pursue housing resources other than public housing or Housing Choice Voucher tenant-based assistance.
- Explore the use of project-based voucher program to help ensure the viability of mixedfinance projects and other developments.

To target available assistance to families at or below 30% of AMI, the SCHA plans to:

- Employ admissions preferences aimed at families with economic hardships.
- Adopt rent policies to support and encourage work.

To target available assistance to families at or below 50% of AMI, the SCHA plans to:

- Employ admissions preferences aimed at families who are working.
- Adopt rent policies to support and encourage work.

To target available assistance to the elderly, the SCHA plans to:

- Work with local agencies that seek transitional housing for the elderly.
- Apply for special-purpose vouchers targeted to the elderly, should they become available.

To target available assistance to families with disabilities, the SCHA plans to:

- Carry out the modifications needed in affordable housing based on the Section 504 Needs
- Assessment for Affordable Housing.
- Apply for special-purpose vouchers targeted to families with disabilities, should they become available.
- Affirmatively market to local non-profit agencies that assist families with disabilities.
- Update SCHA's ADA Needs Assessment and Transition Plan

To conduct activities to affirmatively further fair housing, the SCHA plans to:

- Counsel Housing Choice Voucher tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units.
- Market the Housing Choice Voucher program to owners outside of areas of poverty/minority concentrations.

10.0 Additional Information.

(a) Progress in Meeting Mission and Goals

Goals and Objectives. The following summarizes SCHA's quantifiable goals and objectives that will enable SCHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Included in this report on the progress SCHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

Goals SCHA Goal: Expand the supply of assisted housing

Objectives:

- Apply for additional rental vouchers:
- Reduce public housing vacancies:
- Leverage private or other public funds to create additional housing
- opportunities:

The Authority has made major improvements to the Schuylkill Haven High Rise to meet the needs of current residents and make the units more marketable, including the installation of energy efficient lighting in 110 units, hallways, stairways, common areas and exterior lighting. In addition, the building envelope in the community room and office were replaced with new insulated walls, thermo break window frames and insulated glass. A new energy efficient gas fired hot water boiler was installed at the Schuylkill Haven High Rise for 110 units.

The Authority has also worked closely with agencies providing services to those with disabilities which have resulted in expanded services to residents.

The Housing Authority established a nonprofit corporation to expand affordable housing options in the County. During the past several years, the nonprofit has received grants in the amount of \$50,000 from the Schuylkill County Affordable Housing Trust Fund (Act 137) combined with a match of \$120,000 from the Authority, the non-profit corporation was able to renovate three houses that are now being leased to Housing Choice Voucher families who are participating in the Family Self-Sufficiency Program. The goal is for these families to become homeowners. The corporation hopes to continue the program with the assistance of additional Act 137 funding, other grants, and by utilizing the sales proceeds when the houses are sold.

The Authority applied for additional public funds to create additional housing opportunities. An Act 137 grant in the amount of \$50,000 was awarded and allocated for modernization work at the Minersville High Rise. The Authority also received another Act 137 grant in the amount of \$41,744 which was used in combination with capital funds at the Schuylkill Haven High Rise for the installation of energy efficient

improvements to the units and building as noted above. The Authority received an Act 137 grant in the amount of \$50,000 which was used in combination with capital funds at the Minersville High Rise for elevator modernization. Most recently, the Authority received an Act 139 grant in the amount of \$20,000 which will be used in combination with capital funds at the Minersville High Rise for the community room renovations.

SCHA Goal: Improve the quality of assisted housing

Objectives:

- Increase customer satisfaction:
- Renovate or modernize public housing units:
- Improve energy efficiency:

In addition to the improvements noted above, the Housing Authority installed steel doors at the St. Clair family development, installed new energy efficient lighting and new insulated windows at the Schuylkill Haven family development.

Elevator upgrades have been completed at the Shenandoah High Rise using energy efficient equipment. Modern energy efficient oil fired boilers have been installed along with other energy efficient equipment for the heating and hot water systems. Upgrades to 77 bathrooms using energy efficient fixtures have also been completed.

Elevator modernization work has been completed at the Ashland High Rise using energy efficient equipment. An Act 137 grant in the amount of \$50,000 was awarded and allocated for this work.

New energy efficient lights have been installed at the Coaldale Development both in all 48 units and the exterior lighting.

Other modernization work includes:

- ADA accessible sidewalks and ADA patio furniture Schuylkill Haven High Rise
- ADA office and community room renovations Shenandoah High Rise
- Energy efficient lighting and heating system thermostats Shenandoah High Rise
- Energy efficient windows, community room renovations and ADA office Minersville High Rise
- Hot water boiler replacement Minersville High Rise
- Electrical panel modernization Cass-Minersville Family Development
- Energy efficient lighting at the Cass-Minersville Family Development,

- New kitchens and bathrooms at the Schuylkill Haven Family Development,
- Energy efficient lighting at the Schuylkill Haven High Rise with new windows in the community room
- New thermostats and new windows at the Coaldale Family Development.
- Smoke detector replacement at all developments all units and common areas.
- Energy Efficiency Lighting Modernization at the Shenandoah Family Development and Ashland High Rise.
- Residential Dwelling Addition at the Schuylkill Haven Family Development ADA bathroom and one bedroom.
- ADA Renovations to one bathroom at the Schuylkill Haven High Rise.
- Cass-Minersville Family Development converted two units to a three bedroom unit.
- Elevator modernization at the Schuylkill Haven High Rise.
- Elevator modernization at the Minersville High Rise
- Energy efficient lighting in all units and common areas at the Minersville High Rise.
- New exhaust fans and patio furniture at the Minersville High Rise
- New meter and water valves at St. Clair Family Development.
- Two new energy efficient oil fired boilers at the Coaldale Housing Development.

Status: Capital Fund Program is proceeding on schedule.

Capital Fund Program Status as of 07/31/2014					
FFY	% Obligated	% Expended			
2012	100%	100%			
2013	100%	75%			
2014	40%	23%			

SCHA Goal: Increase assisted housing choices

Objectives:

- Increase voucher payment standards
- Implement voucher homeownership program:

The Authority closely monitors the appropriateness of its Payment Standards in order to maintain a workable, high-quality program balanced by the fiscal restraints of the program. Due to the reduced HUD funding, the Authority ceased issuing Vouchers between September 2012 and November 2013 which has resulted in a decrease in the number of families the Authority was able to assist. The Authority will continue to closely monitor the program within the fiscal restraints of the funding levels.

SCHA has established the Payment Standard for the Section 8 Housing Choice Voucher Program effective November 1, 2014 for all new Housing Assistance Payment Contracts and Annual Reexaminations with an effective date of December 1, 2014 as follows:

PAYMENT STANDARDS-EFFECTIVE 12/1/2014 Final FY 2015 FMRs By Unit Bedrooms								
		Efficiency	One- Bedroom	Two- Bedroom	Three- Bedroom	Four- Bedroom	Five- Bedroom	
FY FMR	2015	\$383	\$494	\$643	\$882	\$888	\$1021	
	Payment \$383 \$494 \$635 \$834 \$856 \$984 Standard							

The Authority is also performed the rent reasonableness and HQS inspections for the Emergency Shelter Grant Program through Schuylkill County to ensure consistency with HUD requirements for the Housing Voucher Program.

SCHA Goal: Provide an improved living environment

Objectives:

• Implement public housing security improvements:

The Authority has installed security cameras at all nine of its family and senior housing developments. The cameras can be viewed via the Internet enabling both the Authority and the Police Departments to monitor activities on the exterior of its buildings. A strong working relationship has been developed with the Schuylkill County Drug Task Force to help eliminate drug activity.

The Authority will evaluate the need to deprogram units with HUD approval, for undercover drug investigative work.

SCHA Goal: Promote self-sufficiency and asset development of assisted households

Objectives:

- Provide or attract supportive services to improve assistance recipients' employability:
- Provide or attract supportive services to increase independence for the elderly or families with disabilities.
- Promote self-sufficiency and assist families to obtain supportive services through the various service agencies with which the Housing Authority has inter-agency agreements.

During the last five-year period, the Authority established an effective Family Self-Sufficiency program for Section 8 Voucher participants; outreach was provided to Voucher holders to urge their participation; and families have been enrolled. Three of the participating families have moved into the houses that were renovated by the Authority's housing corporation with the goal of them becoming homeowners.

Food banks have been established and will be continued at all developments for eligible families.

SCHA Goal: Ensure equal opportunity and affirmatively further fair housing

Objectives:

Continue to provide suitable living environments regardless of race, color, religion, national origin, sex, familial status, or disability. Continue to make special outreach efforts to house disabled persons in handicapped housing through the Anthracite Center for Independent Living. Continue to work closely with Career Link, Schuylkill Community Action, VASH, the REDCo Group, Senior Services, Department of Public Welfare, Service Access Management, Allied Services, Schuylkill MH/MR and LHOT (Local Housing Options Team).

The Authority has agreed to participate in a program sponsored by the Pennsylvania Housing Finance Agency (PHFA) which is designed to increase housing resources for person with disabilities and for those transitioning from nursing homes. Under this Tenant Based Rental Assistance (TBRA) program, PHFA will provide up to 24 months of HOME funded rental assistance to disabled persons and those transitioning from nursing homes who are referred by the Authority, while the Authority maintains them on its waiting list(s) until a permanent voucher or public housing subsidy becomes available.

Resident Membership on PHA Governing Board:

Rose Marteslo – Public Housing Resident at the Cass-Minersville Family Development

Resident Advisory Board:

SECTION 8

Sydney Pope – 109 W. Center Street, Apt. 1, Shenandoah, PA 17976

William Thomas – 222 East Broad Street, Apt. 1006, Tamaqua, PA 18252 Charon Williams – 326 West Broad Street, Apt. 3, Tamaqua, 18252 Christina Flores – 1025-27 West Centre Street, Ashland, PA 17921 Christine Pribish – 305 South Ferguson Street, Shenandoah, PA 17976 Renee Breiner – 401 Hazle Street, Apt. 1, Tamagua, PA 18252

PUBLIC HOUSING

<u>16-2 – Coaldale Housing Development:</u>

Luis Ontiveros – Unit 321

<u>16-3 – Minersville High Rise:</u>

<u>16-5 – Schuylkill Haven High Rise:</u>

Tina Drey – Unit 208 Harry Shire – Unit 602

16-7 – Shenandoah High Rise:

16-8 Shenandoah Family Development:

16-10 – Cass-Minersville Family Development:

Rose Marteslo – Unit 318 Zulayka Olmedo – Unit 674 Carmen Collazo – Unit 622

<u>16-12 – St. Clair Family Development:</u>

Edith Marcelle – Unit 301

16-13 – Schuylkill Haven Family Development:

<u> 16-14 – Ashland High Rise:</u>

(b) DEFINITION OF SIGNIFICANT AMENDMENT AND SUBSTANTIAL DEVIATION/MODIFICATION TO THE AGENCY PLAN:

SCHA defines substantial deviation or modification to the Agency Plan as:

- Significant changes to rent or admissions policies or organization of the waiting list except as required by federal and state regulations and laws;
- A substantial change in a goal(s) identified in the Five Year Plan;
- Significant modifications to major strategies to address housing needs;
- Any change in the planned or actual use of federal funds for activities that would prohibit or redirect the Housing authority's strategic goals of increasing the availability of decent, safe and affordable housing for the citizens of Schuylkill County;
- Additions of non-emergency work items (items not included in the current Annual Statement or Five-year Action Plan) or change in the use of funds that exceeds 20% of the Capital Fund Allocation; and
- Any change with regard to demolition or disposition, designation, homeownership programs or conversion activities.

An exception to this definition will be made for any new activities that are adopted to reflect changes in HUD regulatory requirements, changes in State Law or as result of a declared emergency; such changes will not be considered a substantial deviation or significant amendment or modification by SCHA.

Any significant amendment or substantial deviation/modification to SCHA Plan is subject to the following requirements (including time frames):

- SCHA will consult with the <u>Resident Advisory Board (RAB)</u> (as defined in <u>24 CFR</u> <u>903.13</u>);
- The Authority will ensure consistency with the Consolidated Plan of the jurisdiction(s) (as defined in 24 CFR 903.15); and
- SCHA will provide for a review of the amendments/modifications by the public during a 45-day public review period (as defined in 24 CFR 903.17).
- The Housing Authority will adopt the amendment or modification at a duly called a meeting, open to the public, of its Housing Authority Board of Commissioners.
- SCHA will not implement the amendment or modification until notification of the amendment or modification is provided to HUD and approved by HUD in accordance with HUD's plan review procedures (as defined at 24 CFR 903.23).

A Housing Authority may submit a significant amendment or substantial deviation/modification to HUD up until the last day prior to the date when the next year's Agency Plan is due.

(f) Resident Advisory Board (RAB) comments.

RESIDENT ADVISORY BOARD MEETING:

November 5, 2014

COMMENTS ON ANNUAL PLAN

10:00 AM – Schuylkill Haven High Rise

- 1. When will No Smoking Policy take affect? April 1
- 2. The minimum rent of \$50.00 is good and fair.
- 3. Community Service is a very good thing to give back to the community you are in.
- 4. The work done at the Schuylkill Haven High Rise is beautiful with the new walkways and ADA front entrance. "It's good to be able to come in from the patio."
- 5. "I like the ADA tables."

COMMENTS FROM RESIDENTS

Project PA-16-2 – Coaldale Housing Development – November 14, 2014

(3 residents in attendance)

\$50 minimum rent should be higher. HUD should have higher medical deductions.

Project PA-16-3 – Minersville High Rise and Project PA-16-10 – Cass- Minersville Family Development (meeting combined) - November 21, 2014

(29 residents in attendance)

No comments.

Project PA-16-5 – Schuylkill Haven High Rise – November 21, 2014 (11 residents in attendance)

Tenants agreed No Smoking Policy is good – need an area for smokers. Kitchens are needed.

Project PA-16-7 – Shenandoah High Rise – November 20, 2014 (19 residents in attendance)

No comments.

Project PA-16-8 – Shenandoah Family Development – November 20, 2014 (2 residents in attendance)

Tenant would like doors with peep holes when doors are replaced.

Project PA-16-12 – St. Clair Family Development – November 19, 2014 (No residents in attendance)

Project PA-16-13 – Schuylkill Haven Family Development – November 28, 2014 (1 resident in attendance)

Property is well maintained by the Housing Authority

Project PA-16-14 – Ashland High Rise – November 20, 2014

(6 residents in attendance)

During discussion of No Smoking Policy, residents applauded the Authority for finally putting this in effect.

(g) Challenged Elements

No elements of the SCHA's Agency Plan were challenged.

THE FOLLOWING FORMS WILL BE SUBMITTED WITH THE FFY 2015 ACC CAPITAL FUND AMNEDMENT:

(h) Form HUD-50075.1, Capital Fund Program Annual Statement/Performance and Evaluation Report

(i) Form HUD-50075.2, Capital Fund Program Five-Year Action Plan