



12/13/2024

SCHUYLKILL COUNTY HOUSING AUTHORITY AGENCY PLAN

2025 – 2029 AGENCY PLAN
NARRATIVE



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SCHUYLKILL COUNTY HOUSING AUTHORITY AGENCY PLAN

AGENCY PLAN NARRATIVE

Background

The Schuylkill County Housing Authority is a Housing Authority created under a charter from the Commonwealth of Pennsylvania. The mission of the Schuylkill County Housing Authority is to promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination. The Authority provides decent, safe and sanitary housing for low-income residents of Schuylkill County, exclusive of the City of Pottsville. The Housing Authority has 609 Public Housing units at nine different sites. It also has a Section 8 Housing Choice Voucher Program of 631 Vouchers. The Authority has a non-profit corporation, Schuylkill County Housing Development Corporation. The purpose is to provide additional housing opportunities to low-income residents of Schuylkill County. There are presently three properties under the auspices of the non-profit, with additional properties to be purchased.

The Public Housing Agency Plan is a plan that informs HUD, residents, and the public of the Schuylkill County Housing Authority's (SCHA) mission for serving the needs of low-income and very low-income families and SCHA's strategy for addressing those needs. The Authority has prepared a 5-year plan (2025-2029) for tenant-based assistance and public housing programs and an annual plan for 2025 to supplement the 5-year plan.

The PHA Plan process was established by section 5A of the United States Housing Act of 1937 (42 U.S.C. 1437 et seq.). Section 5A(b) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c-1(b)) was amended by the 2008 Housing and Economic Recovery Act (HERA), Sections 2701 and 2702, Small Public Housing Authorities Paperwork Reduction Act.

Progress in Meeting Mission, 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.

SCHA Goal: Expand the supply of assisted housing

Objectives:

- Maximize lease-up rates in the Section 8/HCV program subject to budget authority
- Apply for additional rental vouchers:
- Reduce public housing vacancies:
- Leverage private or other public funds to create additional housing opportunities:

In 2024, the Housing Authority completed major plumbing renovations at the Schuylkill Haven High Rise. The total cost of the plumbing renovations was \$1,738,371.44, utilizing \$500,000 from Schuylkill County's State/Local Fiscal Recovery funds, Schuylkill County Act 137 funds and 2023 and 2024 Capital Fund monies.

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. 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:

- The Authority was awarded an Act 137 grant, in the amount of \$35,000 used in combination with County S/LFR funds and other Capital Funds to make major plumbing renovations at the Schuylkill Haven High Rise.
- In the past, the Authority also received the following Act 137 grants:
 - \$50,000 for the removal and installation of new sidewalks consisting of 7,230 square feet; removal and installation of 1,250 lineal feet of curbing; removal and installation of 3,592 yards of new bituminous paving; and 550 lineal feet of bituminous milling and patching for the Shenandoah Family development.
 - \$60,478 allocated for the Ashland High Rise and Minersville High Rise Roof Replacements.
 - \$35,000 allocated to support the Roof Replacement at the Schuylkill Haven High Rise.
 - \$39,366 allocated for Ashland High Rise and Shenandoah Family Housing Water Main
 - \$40,000 allocated for modernization work at the Minersville High Rise;
 - \$39,000 allocated for modernization work at the Schuylkill Haven High Rise;
 - \$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;

- \$50,000 which was used in combination with capital funds at the Minersville High Rise for elevator modernization; and
- \$20,000 which will be used in combination with capital funds at the Minersville High Rise for the community room renovations.
- \$32,199 used in combination with capital funds at the Shenandoah High Rise for kitchen and roof replacement.
- \$21,117 used in combination with capital funds at the Ashland High Rise for boiler and water heater replacement.

SCHA Goal: Improve the quality of assisted housing

Objectives:

- Rehabilitation of the existing public housing stock in a manner that is sensitive to the need for accessibility to and visitability by persons with disabilities;
- Increase customer satisfaction:
- Maximize the use of Capital Funds and other resources to renovate or modernize public housing units, subject to budget authority and funding levels:
- Improve energy efficiency:

In addition to the improvements noted above, the Housing Authority has upgraded a unit at the Schuylkill Haven Family development to meet ADA standards for persons with disability and installed carbon monoxide detectors in all public housing units in conformance with the Pennsylvania Carbon Monoxide Detector Law.

The Authority has made other significant improvements to sustain the viability and livability of its public housing units and to maximize the ever-shrinking Capital Funds, including:

- Upgraded the fire management systems in all developments including smoke detectors and CO2 detectors as required.
- Installation of new 3" and 6" water mains and laterals serving each unit at the Shenandoah Family Development
- Installation of steel doors at the St. Clair family development;
- Installation of new energy efficient lighting at the Schuylkill Haven family development; installation of energy efficient windows at the Schuylkill Haven family development;
- Elevator upgrades at the Shenandoah High Rise using energy efficient equipment.
- Installation of three modern energy efficient oil-fired boilers along with other energy efficient equipment for the heating and hot water systems.
- Upgrades to 77 bathrooms using energy efficient fixtures.

- Elevator modernization work 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.
- 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 into a four-bedroom unit.
- Elevator modernization at the Schuylkill Haven High Rise.

- Elevator modernization at the Minersville High Rise
-
- d boilers at the Coaldale Housing Development
- ADA sidewalks at Cass-Minersville
- Sewer replacements at Shenandoah Family Development
- New hot water circulating pumps at Ashland High Rise
- New heat exchange and circulating pump at Minersville High Rise

Status: Capital Fund Program is proceeding on schedule.

Capital Fund Program Status as of 07/31/2024		
FFY	% Obligated	% Expended
2020	100%	100%
2021	100%	100%
2022	100%	100%
2023	95%	93%
2024	37%	10%

Status of 2023 Capital Fund Work

<u>AMP 1</u>			
<u>Shenandoah High Rise</u>			
Replace lobby flooring			Completed
Replace A/C units - community Room			To be Completed
and office			
Refurbish boilers to gas			To be Completed
Install two new direct fired domestic			To be Completed
gas water tanks			
Existing tank removal			To be Completed
<u>Shenandoah Family Development</u>			
Replace playground equipment			To be Completed
<u>Ashland High Rise</u>			
Replace emergency generator			In Progress
<u>AMP 2</u>			

<u>Minersville High Rise</u>			
Replace lobby flooring			Completed
Security fencing installation			To be Completed
<u>Cass-Minersville Family Development</u>			
Replace sidewalks - Carbon and			To be Completed
North Streets			
Replace playground equipment			To be Completed
<u>St. Clair Family Development</u>			
Replace playground equipment			To be Completed
<u>AMP 3</u>			
<u>Coaldale Housing Development</u>			
Replace playground equipment			To be Completed
<u>Schuylkill Haven High Rise</u>			
Replace lobby flooring			Completed
Replace air conditioners			Completed
Refurbish and upgrade main electrical			Completed
line, transformers			

Status of 2024 Capital Fund Work

<u>AMP 1</u>			
<u>Shenandoah High Rise</u>			
Replace 10,000 gallon oil tank			To be Completed
Conversion of two boilers to propane			To be Completed
Replace two direct-fired hot water			To be Completed
tanks			
Install 40 smoke detectors			Completed
<u>Shenandoah Family Development</u>			
Install 200 smoke detectors			Completed
<u>Ashland High Rise</u>			
Install 60 smoke detectors			Completed
<u>AMP 2</u>			
<u>Minersville High Rise</u>			

Replace lobby flooring		Completed	
<u>St. Clair Family Development</u>			
Install 85 smoke detectors		Completed	
<u>AMP 3</u>			
<u>Coaldale Housing Development</u>			
Install 75 smoke detectors		Completed	
<u>Schuylkill Haven High Rise</u>			
Replace lobby flooring		Completed	
Replace air conditioners		To be Completed	
Refurbish and upgrade main electrical		Completed	
Lines			
Replace water lines and plumbing		Completed	

SCHA Goal: Increase assisted housing choices

Objectives:

- Increase voucher payment standards
- Provide Project Based Vouchers for the Cherry Street Commons and Frackville Flats LIHTC developments
- Implement voucher homeownership program:

The Authority has 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:

- Conduct Radon Testing to ensure a safe living environment for the residents
- Implement public housing security improvements:

The Authority completed the Radon Testing, as recommended by the recent environmental review, in its public housing developments with FY 2020 Capital Funds to ensure a safe living environment for the residents.

The Authority is upgrading 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.

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, sexual orientation, gender identity, marital 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).

Components of the PHA Plan

Component One: Housing Needs

The first component of the Agency Plan identifies the housing needs of income-eligible families who reside in the jurisdiction served by the Housing Authority, as well as of families who are on the public housing and Section 8 program waiting lists. The component asks for information on categories of income-eligible families, including: families of different income levels, elderly families, families with members with disabilities, and households of any races or ethnic groups that have greater housing needs than average for the jurisdiction. The final part of this component describes the

various strategies the Housing Authority will undertake in the coming year in order to address the needs that have been identified.

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

Based upon the information contained in the Pennsylvania Housing Finance Agency (PHFA) County Profiles, Pennsylvania Comprehensive Housing Study (May 2020) applicable to the jurisdiction, and/or other data available to SCHA, provides a statement of the housing needs in the jurisdiction in the table on the following page.

SCHUYLKILL COUNTY

SMALL URBAN

	MEDIAN HOUSEHOLD INCOME	MEDIAN GROSS RENT	RENT BURDEN	HOME OWNERSHIP
SCHUYLKILL COUNTY	\$53,703	\$710	40.9%	75.2%
STATE AVERAGE	\$63,627	\$958	43.1%	69.0%

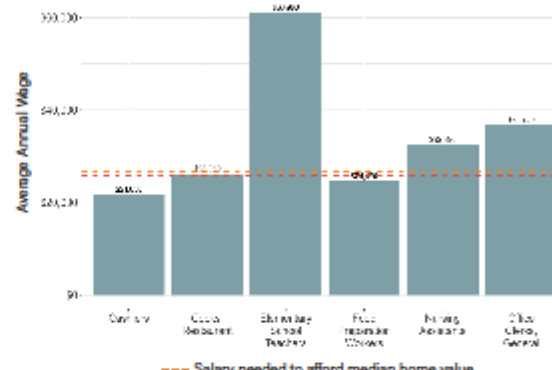


Supply of Affordable Units by Renter Income, 2019



HAMFI* - HUD Area Median Family Income
Source: Comprehensive Housing Affordability Strategy

Occupational Wages and Housing Affordability, 2020



Source: Center for Workforce Information & Analysis

County Demographics

	2010	2020	% Change	PA Average
Socioeconomics				
Average Household Size	2.3	2.3	-1.7	2.4
Total Population	148,288	141,935	-4.3	12,794,885
Age Under 5 (%)	5.2	4.9	-6.3	5.5
Age 5 to 17 (%)	15.1	14.9	-1.2	15.2
Age 18 to 65 (%)	61.5	59.8	-2.7	61.0
Age 65+ (%)	18.2	20.4	12.0	18.3
Race and Ethnicity				
White (%)	93.7	90.4	-3.5	75.7
Black (%)	2.4	2.7	11.2	10.6
American Indian (%)	0.1	0.1	47.1	0.1
Asian (%)	0.5	0.4	-24.8	3.5
Hawaiian (%)	0.0	0.0	74.1	0.0
Other Races (%)	0.1	0.0	-19.6	0.3
Two or more Races (%)	0.8	1.5	94.3	2.2
Hispanic or Latino	2.4	4.8	100.5	7.6
Disabled (%)	-	18.0	-	14.0
Veterans (%)	13.3	8.9	-33.1	7.2
Families below Poverty Level (%)	8.2	9.0	9.8	8.1
Transportation				
Average Commute Time (mins)	25.0	26.6	6.4	27.1
Commute by Car (%)	92.5	91.8	-0.8	82.6
Commute by Public Transit (%)	0.5	0.5	1.0	5.2
Technology				
Homes with Internet Access (%)	-	79.9	-	84.5

Source: U.S. Census Bureau

County Housing and Employment

	2010	2020	% Change	PA Average
Housing				
Median Home Value (\$)	106,080	106,100	0.0	187,500
Monthly Rent: 1 Bedroom (\$)	-	518	-	810
Monthly Rent: 2 Bedroom (\$)	-	720	-	984
Vacancy (%)	12.9	16.2	25.6	10.6
Median Year Structure Built	1940	1943	0.2	1963
Housing Units				
Single Family Unit	57,732	58,254	0.9	4,324,764
2 to 4 Units	4,701	4,874	3.7	477,364
5+ Units	4,051	4,088	0.9	691,753
Total Units	69,271	69,965	1.0	5,713,345
Permits Issued				
Total Permits	187	104	-0.4	16,882
Single Family Unit	186	104	-0.4	15,846
Duplex Unit	1	0	-1.0	404
3 to 4 Units	0	0	-	322
5+ Units	0	0	-	310
Employment				
Unemployment Rate (%)	7.6	5.2	-0.3	5.4
Goods-producing	42,219	57,913	37.2	67,726
Natural resources and mining	35,607	51,528	44.7	61,949
Service-providing	29,981	39,753	32.6	60,756
Trade, transportation, and utilities	29,144	39,968	37.1	49,535
Professional and business services	35,755	49,655	38.9	86,971
Education and health services	34,598	44,196	27.7	57,087

Source: U.S. Census Bureau, U.S. Bureau of Labor Statistics, PolicyMap

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 Needs of Families on the Waiting List Public Housing			
	# of families	% of families	total Annual Turnover
Waiting list total	611		156
Extremely low income <=30% AMI	473	78%	
Very low income (>30% but <=50% AMI)	92	15%	
Low income (>50% but <80% AMI)	46	7%	
Families with children	294	48%	
Elderly families	63	10%	
Families with Disabilities	172	28%	
Nondisabled, nonelderly, no children	168	28%	
White – Non-Hispanic	317	52%	
White – Hispanic	94	15%	
Black – Non-Hispanic	119	20%	
Black – Hispanic	15	3%	
Multi-Racial/Non-Hispanic	18	3%	
Multi-Racial/Hispanic	4	<1%	
Unspecified Race/Hispanic	35	6%	
American Indian/Alaska Native/Non-Hispanic	2	<1%	
Unspecified Race/Non-Hispanic	5	<1%	
Asian/Hispanic	1	<1%	
Asian/Non-Hispanic	1	<1%	
Characteristics by Bedroom Size (Public Housing Only)			
0 BR	5	1%	56
1BR	303	50%	60
2 BR	155	25%	14
3 BR	96	16%	23
4 BR	45	7%	2
5 BR	7	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	504		124
Extremely low income <=30% AMI	385	76%	
Very low income (>30% but <=50% AMI)	119	24%	
Low income (>50% but <80% AMI)	0	0%	
Families with children	248	49%	
Elderly families	63	13%	
Families with Disabilities	155	31%	
Nondisabled, nonelderly, no children	101	20%	
White – Non-Hispanic	269	53%	
White - Hispanic	61	12%	
Black – Non-Hispanic	95	19%	
Black - Hispanic	15	3%	
Multi-racial – Non- Hispanic	14	3%	
Unspecified Race- Hispanic	34	7%	
Unspecified Race-Non- Hispanic	7	1%	
Multi-Racial - Hispanic	3	1%	
American Indian/Alaska Native/Non Hispanic	2	<1%	
Native Hawaiian/Other Pacific Non-Hispanic	1	<1%	
American Indian/Alaska Native/Hispanic	1	<1%	
Native Hawaiian/Other Pacific/Hispanic	1	<1%	
Asian/Non-Hispanic	1	<1%	

Subcomponent C: Strategies for Addressing 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 maximize the number of affordable housing units occupied.
- Conducted Radon Testing to ensure a safe environment for the residents
- Reduce turnover time for vacated affordable housing units.
- Reduce time to renovate affordable housing units.
- Make capital improvements to the current housing stock as funding allows.
- 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 SCHAs, regardless of unit size required.
- Maximize the Housing Choice Voucher lease-up rates and budget utilization subject to budget authority 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
- Updated the Energy Audit for all developments to identify short-term and long-term improvements needed to ensure physical and economic viability of SCHAs's housing stock.

To increase the number of affordable housing units, the SCHAs has or plans to:

- ***Applied for and received 40 Mainstream Vouchers to assist non-elderly families that include a person with disabilities who is at least 18 years old and not yet 62 years old at the effective date of the initial Housing Assistance Payment (HAP) Contract. The Housing Authority currently has 146 applicants on its Housing Choice Voucher waiting list who are non-elderly between 18 years of age and under 62 years of age that includes a family member with a disability.***
- **The Housing Authority is a member of the Schuylkill County Response Recovery and Renewal Task Force. The group is made up of leaders in agriculture, business, education, health care, local government, manufacturing, nonprofit, human services as well as state and federal legislative delegates to provide guidance that addresses the County COVID-19 concerns in concert with guidelines provided by the CDC, PA Department of Health and other agencies.**
- **The Housing Authority partnered with Lehigh Valley Health Network and the Pennsylvania Department of Health to assist the elderly, handicapped and families during the COVID-19 pandemic.**
- ***Entered into an interagency agreement with the Pottsville Housing***

Authority authorizing PHA to issue HCV program vouchers within SCHA's jurisdiction in support of Independence Square LIHTC project located in Orwigsburg, Schuylkill County.

- ***Attach Project Based Vouchers to the Cherry Street Commons and Frackville Flats Low-Income Housing Tax Credit development in Frackville.***
- ***Assist other LIHTC Developers with Project Based Vouchers to the extent feasible within the Housing Authority's 20% program baseline.***
- 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 mixed-finance projects and other developments.

To target available assistance to Homeless individuals and families:

- Establish an admission preference for chronically homeless applicants who are receiving case management assistance.
- Actively participate in initiatives to end homelessness to assist this population.
- Work collaboratively with community partners such as the Local Housing Options Team (LHOT) to find case management services for disabled formerly homeless individuals in Public Housing and the Housing Choice Voucher Program.
- ***Partner with the Eastern Pennsylvania Continuum of Care (CoC) Coordinated Entry System (CES) to coordinate referral to eligible persons experiencing or at imminent risk of homelessness.***
- ***Partner with the Schuylkill County Drug Treatment Court to improve the overall quality of life in the community by providing a court-supervised program for substance dependent offenders that will enhance public safety, reduce recidivism, hold offenders accountable, reduce costs to the community, and ultimately transform offenders into positive, contributing members of the community.***

To target available assistance to Extremely Low-Income families whose incomes do not exceed the higher of the Federal poverty level or 30% of the 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 SCHAs plan 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 SCHAs plan 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 SCHAs plan to:

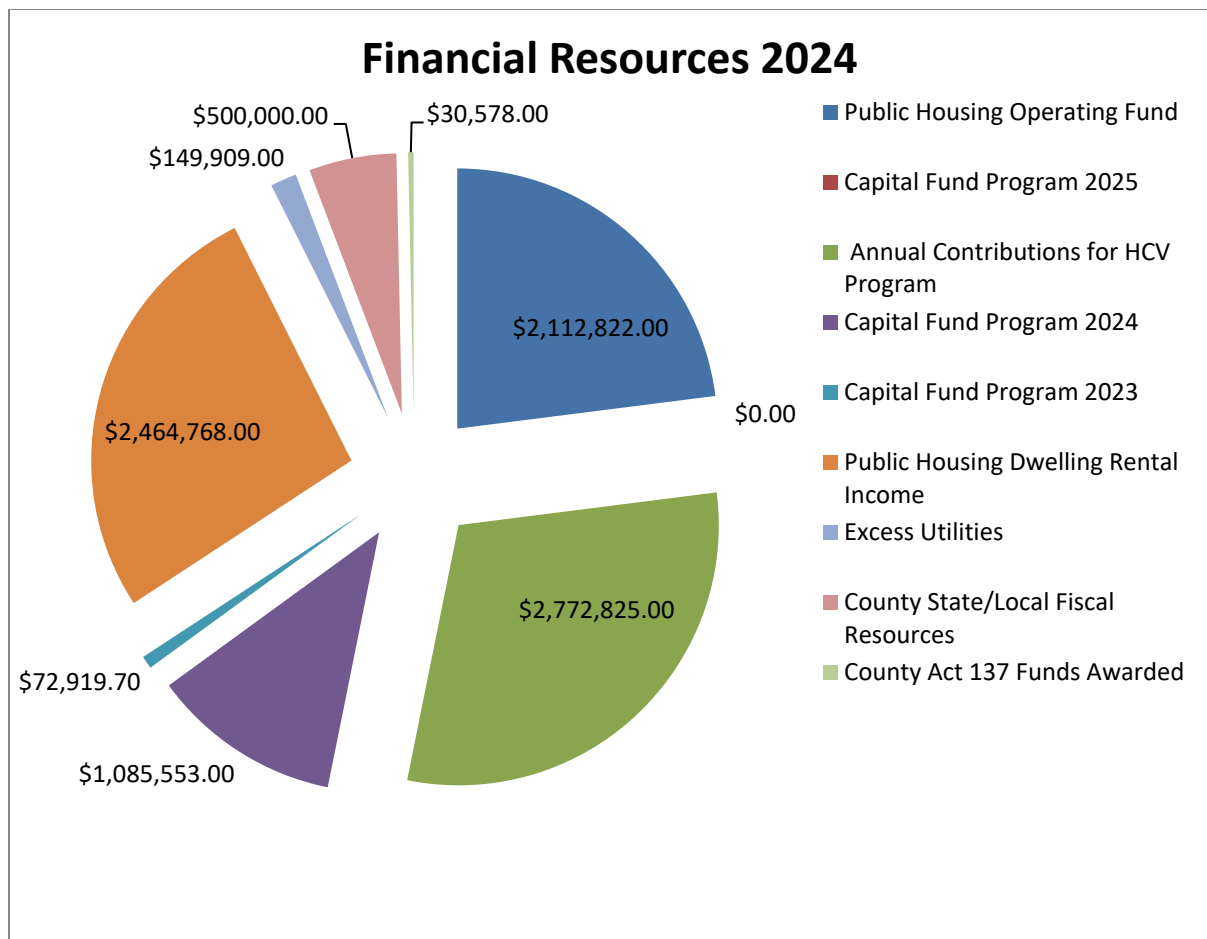
- Carry out the modifications needed in affordable housing based on the Section 504 Needs
- Assessment for Affordable Housing.
- Apply for special-purpose vouchers targeted to families with disabilities, should they become available.
- Affirmatively market to local non-profit agencies that assist families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

To conduct activities to affirmatively further fair housing, the SCHAs plan to:

- **Enter into a Memorandum of Understanding to collaborate with the Commonwealth of Pennsylvania for the preparation of the Assessment of Fair Housing in compliance with the requirements for Affirmatively Furthering Fair Housing found at 24 CFR §§5.150 through 5.180.**
- 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.

Component Two: Statement of Financial Resources

In this component, SCHAs provide information about the financial resources available to support the housing programs administered by the Authority and described in the Plan.



These include Federal resources such as Public Housing Operating Fund and Capital Fund, and Housing Choice Voucher Tenant-Based Assistance. In addition, SCHAs financial resources includes public housing rental income, County Act 137 Funding and other income from non-Federal sources.

Component Three: PHA Policies Governing Eligibility

Selection, and Admissions

In this component, the Housing Authority provides information about the various discretionary policies for the eligibility, admissions and occupancy of both public housing and Section 8 tenant-based assistance

Eligibility, Selection, and Admissions Policies.

Affordable Housing Eligibility. Sections of the Public Housing Admission and Occupancy Policy indicate the primary descriptions of the suitability and eligibility requirements for SCHAs 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.

The Housing Authority has not made revisions to the Admission and Continued Occupancy Policy nor to the Administrative Plan for the Housing Choice Voucher program since the FY 2024 Agency Plan submission in accordance the updated regulations required by the Housing Opportunity Through Modernization Act (HOTMA). Some of the required updates have not been implemented pending revisions to the Department of Housing and Urban Development’s on-line reporting system.

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.

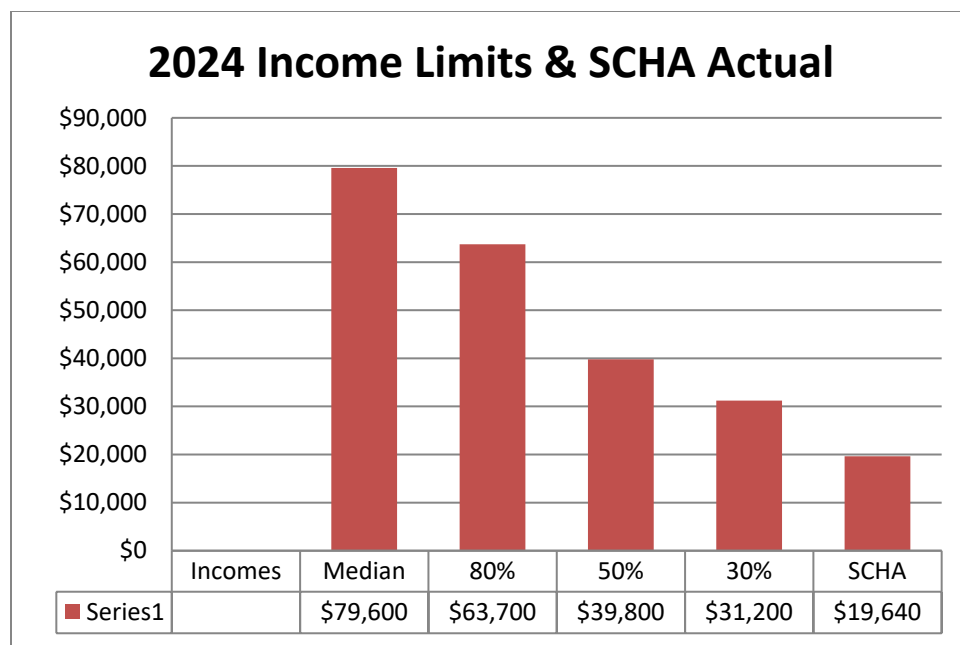
To accomplish the deconcentration goals, the SCHA contemplates taking the following actions:

- 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 3 of the 9 developments are within 85 and 115 percent of the overall average and 6 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	Units Filled	Total Income	Average Income	% of Average
		\$		
Shenandoah High Rise	77	1,201,451.00	\$15,603.26	79%
Shenandoah Family	69	1,579,266.20	\$22,887.92	117%
		\$		
Ashland High Rise	50	813,678.00	\$16,273.56	83%
TOTAL AMP 1	196	3,594,395.20	18,338.75	93%
AMP 2				
		\$	\$	
Minersville High Rise	98	1,554,416.00	15,861.39	81%
		\$	\$	
Cass-Minersville Family	79	2,019,218.00	25,559.72	130%
		\$	\$	
St. Clair Family	35	617,616.00	17,646.17	90%
		\$	\$	
TOTAL AMP 2	212	4,191,250.00	19,770.05	101%
AMP 3				
		\$	\$	
Coaldale Elderly/Family	48	933,826.00	19,454.71	99%
		\$	\$	
Schuylkill Haven High Rise	110	2,092,935.00	19,026.68	97%
		\$	\$	
Schuylkill Haven Family	40	1,089,364.00	27,234.10	139%
		\$	\$	
TOTAL AMP 3	198	4,116,125.00	20,788.51	106%
TOTAL ALL AMPS	606	11,901,770.20	19,639.88	
		\$		
Median Income		79,600.00		

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 2024 median income for Schuylkill County is \$79,600. HUD has established \$31,200 as the average extremely low income level for Schuylkill County for 2024. The average incomes of all the family developments are below 30 percent of the area median income. The average income of family occupants is 25 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 Community-Wide Waiting Lists for all developments. Interested persons may apply for admission to Affordable Housing at the SCHA Administrative Office, 245 Parkway, Schuylkill Haven, PA, at any of the project offices, or may contact the office for a reasonable accommodation.

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 Administrative Offices located at 245 Parkway, Schuylkill Haven, PA when the applicable waiting list is open or may contact the office for a reasonable accommodation.

Component Four: Rent Determination Policies

A family's income is used to calculate the family's rent payment. The SCHA uses the policies and methods described in the Public Housing Admission and Occupancy Policy, as well as HUD regulations, to ensure that only eligible families receive assistance and that no family pays more or less than its obligation under the regulations. 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).

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 not employ any discretionary rent-setting 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 also utilizes flat rents and ceiling rents, as outlined in Public Housing Admission and Occupancy Policy. Flat rents are market-based rents, which vary by unit size and type and by development location. SCHA has established the Flat Rents for the Public Housing Program effective October 1, 2024 for all new admissions and annual reexaminations with an effective date of November 1, 2024 as follows:

FY 2024-2025 Flat Rents by Occupancy and Unit Bedrooms							
		Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom	Five-Bedroom
ALL	SCHA	\$718	\$731	\$951	\$1,244	\$1,306	\$1,502
Units							

Once each year, only at admission or at the annual recertification, all residents are offered the choice of paying an income-based rent or the flat rent. Flat rents represent the actual market value of SCHA's housing units. Flat rents provide an incentive for families to remain in affordable housing until they are ready to transition to conventional housing markets or homeownership.

B. Section 8 Tenant-Based Assistance

SCHA has established the Payment Standards for the Housing Choice Voucher Program effective October 1, 2024 for all new contracts and annual reexaminations with an effective date of November 1, 2024 as follows:

PAYMENT STANDARDS-EFFECTIVE 10/1/2021 For 2024-2025 FMRs by Unit Bedrooms						
	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom	Five-Bedroom
FY 2025 FMR	\$718	\$731	\$951	\$1,244	\$1,306	\$1,502
Payment Standard	\$682	\$694	\$903	\$1,182	\$1,241	\$1,427

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.

SCHA's minimum rent for the public housing and Section 8 programs is \$50.00. SCHA has adopted a minimum rent hardship exemption policy for residents/participants paying the minimum rent.

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 .

Component Five: Operations and Management

SCHA maintains its units in accordance with its Admission and Occupancy Policy, Administrative Plan or other governing policy documents, as well as the use of “best practices” prevalent for multi-family housing. As applicable to each housing program, SCHA employs standardized routine and non-routine maintenance protocols, UPCS inspections, Rent Reasonableness determinations, HQS Inspections, Emergency Inspections, Rent Collection, Periodic Pest Eradication Spraying (for owned units only) and Housekeeping practices and policies designed to enhance the livability housing units owned, assisted, or operated by SCHA.

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:

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.

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.
2. **Section 8 Housing Choice Vouchers:** The Authority received a High Level of Performance status under HUD's Section 8 Management Assessment Program (SEMAP).

The Authority will continue to pursue a High-Performance status in the up-coming year.

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.

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.
2. **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.

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.
2. **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.

Lead Safety Housing Rule (LSHR)

The Schuylkill County Housing Authority has updated its Lead Based Paint Policy as it relates to its Public Housing Program, Housing Choice Voucher (HCV) property owners and Project-Based Voucher (PBV) property owners on the required actions that must be taken when a child

in a family receiving public housing, HCV or PBV assistance is identified as having an elevated blood lead level (EBLL). These updates focus on (but is not limited to) changes to HUD's Lead Safe Housing Rule (LSHR) as it relates to children identified as an EBLL. The Lead Safe Housing Rule is codified as 24 Code of Federal Regulations (CFR) Part 35, subparts B – R.

The LSHR applies to “target housing,” which, under the LSHR, is any housing constructed prior to 1978, except housing for households for the elderly or persons with disabilities or any 0-bedroom dwelling (unless any child who is less than 6 years of age resides or is expected to reside in such housing).

The key changes in the LSHR include revising HUD's “Environmental Investigation Blood Lead Level” (EIBLL) to the EBLL, enhancing the level of investigation required for a housing unit of a child with an EBLL to an “environmental investigation” and adding a requirement for testing in other covered units when a child is identified in a multiunit property.

Section 3 Policy Updated

The Schuylkill County Housing Authority updated its Section 3 Policy for creating economic opportunities for low-and very low-income persons and eligible businesses to comply with the Federal Regulations at 24 CFR 75. Under the new rule, funding recipients will track total labor hours worked for all workers and for Section 3 Workers and Targeted Section 3 Workers for the applicable fiscal year. Under the previous rule (24 CFR Part 135), HUD required PHAs to track new Section 3 hires. Tracking new hires is no longer required. This change enables recipients to measure total actual employment and the proportion of the total employment performed by low- and very low-income workers.

Component Six: PHA Grievance Procedures

The Admission and Occupancy Policy outlines the SCHAs Grievance Procedure for affordable housing applicants and residents. The grievance procedure includes the necessary standards and criteria established for SCHAs residents to have a fair opportunity for a hearing or informal conference regarding any SCHAs action of failure to act involving residents' lease, rights, duties, welfare, or status.

Component Seven: Capital Improvement Needs

The following Table outlines the Capital Improvement Needs proposed for 2025

<u>CAPITAL IMPROVEMENT NEEDS PROPOSED FOR 2025:</u>					
Operations				\$ 437,826.00	
Management Improvements				\$ 5,000.00	
Administration				\$ 175,130.00	
Fees and Costs				\$ 140,000.00	
<u>AMP 1</u>					
<u>Shenandoah High Rise</u>					
Replace three air conditioning units -				\$ 20,000.00	

office/community room			
<u>AMP 2</u>			
<u>Minersville High Rise</u>			
Remove concrete floor at front entrance and replace with concrete		\$ 250,000.00	
<u>Cass-Minersville Family Development</u>			
Window replacement - 79 units		\$ 723,350.00	
		TOTAL	\$ 1,751,306.00

The following are the Work Statements for 2026 through 2029

<u>WORK STATEMENT FOR 2026:</u>			
Operations, Management Improvements, Administration, Fees and Costs		\$ 757,956.00	
<u>AMP 1</u>			
<u>Shenandoah Family Development</u>			
Replace 140 entrance doors		\$ 450,000.00	
Replace 70 storm doors		\$ 105,000.00	
Replace 70 electrical closet doors		\$ 49,000.00	
<u>AMP 2</u>			
<u>Minersville High Rise</u>			
Install interior security fencing		\$ 116,013.00	
<u>AMP 3</u>			
<u>Coaldale Housing Development</u>			
Replace refrigerators - 20		\$ 15,000.00	
Replace stoves - 20		\$ 10,000.00	
Replace 72 entrance doors		\$ 198,337.00	
<u>Schuylkill Haven High Rise</u>			
Replace stoves - 20			\$10,000.00
Replace refrigerators - 20			\$15,000.00
<u>Schuylkill Haven Family Development</u>			
Replace refrigerators - 20		\$ 15,000.00	
Replace stoves - 20		\$ 10,000.00	

		TOTAL		\$ 1,751,306.00	
		<u>WORK STATEMENT FOR 2027:</u>			
		Operations, Management Improvements,			
		Administration, Fees and Costs		\$ 757,956.00	
		<u>AMP 1</u>			
		<u>Shenandoah High Rise</u>			
		Replace 10,000 gallon oil tank		\$ 93,000.00	
		Conversion of two boilers to propane		\$ 212,297.00	
		Replace stoves - 20 units		\$ 10,000.00	
		<u>Shenandoah Family Development:</u>			
		Replace refrigerators - 20 units		\$ 15,000.00	
		<u>Ashland High Rise</u>			
		Repairs to domestic water lines -		\$ 10,000.00	
		50 units			
		Replace stoves - 20 units		\$ 10,000.00	
		Replace refrigerators - 20 units		\$ 15,000.00	
		<u>AMP 2</u>			
		<u>Minersville High Rise</u>			
		Repair and seal brick		\$ 30,000.00	
		Replace four steel doors		\$ 8,000.00	
		<u>Cass-Minersville Family Development</u>			
		Underground electric line replacement		\$ 40,000.00	
		Replace 160 entrance doors		\$ 66,949.00	
		Replace 160 storm doors		\$ 50,000.00	
		Install two ADA ramps and railing		\$ 10,000.00	
		Repave three parking lots		\$ 50,000.00	
		Replace roofs - 79 units		\$ 60,000.00	
		<u>St. Clair Family Development:</u>			
		Underground electric line replacement		\$ 70,000.00	
		Replace sidewalks - 35 units		\$ 43,104.00	
		Repave parking lot		\$ 35,000.00	
		Roof replacement - 35 units		\$ 40,000.00	

<u>AMP 3</u>				
<u>Coaldale Housing Development:</u>				
Replace storm doors - 48 units			\$	50,000.00
Replace baseboard heater covers - 48 units			\$	30,000.00
<u>Schuylkill Haven Family Development</u>				
Sidewalk replacement - 40 units			\$	45,000.00
		TOTAL	\$	1,751,306.00
<u>WORK STATEMENT FOR 2028:</u>				
Operations, Management Improvements, Administration, Fees and Costs			\$	757,956.00
<u>AMP 1</u>				
<u>Shenandoah High Rise</u>				
Repair and seal brick			\$	80,000.00
Repair and replace 30 windows			\$	10,000.00
<u>Shenandoah Family Development</u>				
Roof replacement			\$	100,000.00
<u>Ashland High Rise</u>				
Replace bathrooms - 50 units			\$	100,000.00
Repair and seal brick			\$	60,000.00
Replace 50 meter bases			\$	10,000.00
<u>AMP 2</u>				
<u>St. Clair Family Development</u>				
Roof replacement - 35 units			\$	110,000.00
Siding replacement - 35 units			\$	100,000.00
Replace sidewalks - 35 units			\$	100,000.00
<u>AMP 3</u>				
<u>Coaldale Housing Development</u>				
Roof replacement - 48 units			\$	105,350.00
Replace underground heating pipes - 48 units			\$	50,000.00
Repave parking lots - 48 units			\$	20,000.00
Sidewalk replacement - 48 units			\$	65,000.00

<u>Schuylkill Haven High Rise</u>					
Exterior door replacement - 3 doors				\$ 15,000.00	
Replace exterior air conditioners				\$ 8,000.00	
Repair and seal brick				\$ 60,000.00	
		TOTAL		\$ 1,751,306.00	
<u>WORK STATEMENT FOR 2029:</u>					
Operations, Management Improvements,					
Administration, Fees and Costs				\$ 757,956.00	
<u>AMP 1</u>					
<u>Shenandoah High Rise</u>					
Elevator repairs - new closed loop				\$ 25,000.00	
variable voltage frequency AC					
drive and stainless steel cab door					
<u>Ashland High Rise</u>					
Repair and seal brick				\$ 400,000.00	
Elevator repairs - new closet loop				\$ 25,000.00	
variable voltage frequency AC					
drive and stainless steel cab door					
<u>AMP 2</u>					
<u>Minersville High Rise</u>					
Elevator repairs - new closed loop				\$ 75,000.00	
variable voltage frequency AC					
drive, new operating panels and					
door loop operator					
<u>AMP 3</u>					
<u>Schuylkill Haven High Rise</u>					
Repair and seal brick				\$ 453,350.00	
Elevator repairs - one regen unit and				\$ 15,000.00	
one exhaust fan					
		TOTAL		\$ 1,751,306.00	

Component Eight: Demolition and Disposition

Component Nine: Designation of Public Housing

Component Ten: Conversion of Public Housing

Component Eleven: Homeownership

The Housing Authority's Administrative Plan contains a Homeownership component giving the Authority the option of utilizing its Housing Choice Vouchers if the demand warrants. Currently there are no families participating in the program.

Component Twelve: Community Service and Self-Sufficiency

SCHA has employed a collaborative approach to the provision of programs, services and amenities regarding Community Service and Family Self-Sufficiency activities. SCHA entered into a cooperative agreement with its local Welfare ("TANF") Agency on to share information and/or target supportive services as contemplated by section 12(d)(7) of the Housing Act of 1937. Other coordination efforts between the SCHA and TANF Agency include: (i) client referrals; (ii) information sharing regarding mutual clients (for rent determinations and otherwise); (iii) coordinating the provision of specific social and self-sufficiency services and programs to eligible families; (iv) other like activities.

In addition, both the Admission and Occupancy Policy and Housing Choice Administrative Plan outline specific guidelines for Community Service and Family Self-Sufficiency Independence initiatives.

Policies or Programs for Economic and Social Self-sufficiency.

SCHA will employ the following discretionary policies to enhance the economic and social self-sufficiency of assisted families:

- Affordable Housing Admissions policies;
- Housing Choice Voucher Program Admissions policies;
- Preferences for families working or engaging in training or education programs for non-housing programs operated or coordinated by the SCHA;
- Preference/eligibility for Affordable Housing homeownership option participation;
- Preference/eligibility for Housing Choice Voucher Program homeownership option participation; and
- Preferences for homeownership units built by SCHA to families who have successfully completed SCHA's Family Self-Sufficiency and homeownership programs.

The SCHA Family Self Sufficiency (FSS) Action Plan describes the policies and procedures of for operation of the FSS program. The SCHA FSS Action Plan has been updated and approved by HUD. The FSS Action Plan including procedures concerning the development and approval of the plan, are described in the revised Code of Federal Regulations at 24 CFR 984.201.

Homelessness

The Schuylkill County Housing Authority is an active member/participant in the Local Housing Options Team (LHOT) which is a collaborative of social services agencies and other public and private organizations that serve Schuylkill County and promotes safe, affordable, accessible housing choices for persons with disabilities and homeless persons.

In addition, the Housing Authority has amended the Local Preference Category in both the Admission and Occupancy Policy and Housing Choice Voucher Administrative Plan to eliminate the following language from the “Resident of Schuylkill County” preference: “Note: Persons residing in shelters or half-way houses are considered temporary residences and therefore do not qualify as a permanent resident of Schuylkill County.”

The Housing Authority will therefore recognize persons residing in shelters or half-way houses in Schuylkill County as qualifying for the “Resident of Schuylkill County” preference.

Other Supportive Service Activities

The Schuylkill County Housing Authority sponsors a Supportive Services Provider Fair at the Schuylkill Haven, Minersville, Ashland, and Shenandoah High Rise developments for the elderly and persons with disabilities. These service providers include:

- ***AHEDD***
- ***Allied Services***
- ***Community Development Block Grant (Fair Housing)***
- ***Northwestern Human Services***
- ***Nutrition Links***
- ***Office of Senior Services***
- ***Resources for Human Development***
- ***Schuylkill Community Action***
- ***Schuylkill Hope Center for Victims of Domestic Violence***
- ***Servants to All***
- ***Service Access and Management, Inc.***
- ***Suicide Prevention Task Force***
- ***Supportive Services for Veteran Families***
- ***Opportunity House***

In addition, the Penn State Cooperative Extension provides a Nutrition Program at the family developments designed to facilitate positive behavior changes to help build caring, safe and healthy communities. The program provides guidelines for individuals aged 2 and over to improve the quality and content of their diet and lifestyle to lower their risk of chronic diseases and conditions.

Community Service and Income Changes.

SCHA will comply with the community service and treatment of income changes resulting from welfare program requirements in strict accordance with the applicable provisions in

SCHA's Admission and Occupancy Policy, Administrative Plan, Lease and other key program documents.

Component Thirteen: PHA Safety and Crime Prevention

SCHA works closely with law enforcement agencies to ensure the safety of its public housing residents and to promote safety and crime prevention with its public housing developments, including the following:

1. Local police conduct criminal history background checks in an effort to enforce 1 strike policy
2. Local police provide up to date information regarding criminal activity on or near the public housing developments
3. Police cooperation with SCHA in hearings involving drugs and other criminal activities
4. Police cooperate with state and federal (OIG) for local drug and fraud cases involving housing participants
5. Police inform SCHA of registered sex offenders
6. SCHA has installed and updated exterior and interior camera security system in elderly and family developments.

Component Fourteen: Pet Policy

The Public Housing Admission and Occupancy Policy explains SCHA's policies on pet ownership in designated communities. The rules adopted are reasonably related to the legitimate interest of SCHA to provide a decent, safe and sanitary living environment for all residents, and to protect and preserve the physical condition of the property, as well as the financial interest of SCHA. Generally, the rules require that residents: (i) identify all pets, (ii) have pets inoculated and licensed according to state and local laws; (iii) show annual updates on pet certifications; (iv) become subject to increased unit inspections to determine damage to the unit caused by pets; (v) pay a pet deposit; and (vi) ensure that the pet does not become a nuisance to the other residents in the community.

SCHA's policies on pet ownership does not apply to animals that are used to assist persons with disabilities. Residents must care for service animals and assistance animals in a manner that complies with state and local laws, including anti-cruelty laws. Residents must ensure that service animals and assistance animals do not pose a direct threat to the health or safety of others, or cause physical damage to the development dwelling unit, or property of other residents.

Component Fifteen: Civil Rights Certifications

SCHA is currently updating its ADA Self-Evaluation and Transition Plan and continues to work with local agencies to improve access to its programs and services, through the following activities and actions:

Civil Rights

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 the Public Housing Admission and Occupancy Policy and 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 countywide 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, if required the SCHA procures services from a qualified sign language interpreter, as well as have written materials explained orally by staff either in person or by telephone.

Component Sixteen: Fiscal Audit

Francis J. McConnell, CPA, who conducted an independent audit of the Housing Authority as of March 31, 2024, stated "..., Schuylkill County Housing Authority complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended March 31, 2024."

Component Seventeen: PHA Asset Management

The Schuylkill County Housing Authority management of its public housing developments emphasizes the most cost effective way to operate, manage and maintain its housing portfolio and to provide for present and future tenants and the communities. The Authority has identified 3 Asset Management Properties (AMPs) that are identified as AMP 1 consisting of the Shenandoah High Rise, Shenandoah Family Development and the Ashland High Rise; AMP 2 consisting of Minersville High Rise, Minersville Family Development and St. Clair Family Development; and AMP 3 consisting of Coaldale Housing Development, Schuylkill Haven High Rise and Schuylkill Haven Family Development. The Housing Authority has contracted with Energy Consulting Services to prepare an updated Physical Needs Assessment and Energy Audit for each of its developments which will provide the Authority with framework for the evaluation and prioritization of capital improvements and the long-term sustainability and viability for each development. Upon completion of the PNA and EA, a copy will be submitted to the Philadelphia HUD Office.

Component Eighteen: Other Information

In this component, the SCHA provides information regarding several topics, including its Resident Advisory Board and Resident Membership in the PHA's Governing Board.

Resident Membership on SCHA's Governing Board

Aaron Earlosky (255 Parkway, Apt. 908, Schuylkill Haven, PA) serves as the Resident Member on the Housing Authority's Board of Commissioners.

Resident Advisory Board

RESIDENT ADVISORY BOARD

SECTION 8:

Marina Marini – 762 Claremont Avenue, Apt. B, Tamaqua, PA 18252
Charles Roberts – 222 East Broad Street, Apt. 1407, Tamaqua, PA 18252
James Munley – 34 Blue Mountain Heights, Schuylkill Haven, PA 17972
Molly Pavia – 233 Schuylkill Avenue, Tamaqua, PA 18252
Nalasia Holifield – 39 West Spruce Street, Mahanoy City, PA 17948

PUBLIC HOUSING:

16-2 – Coaldale Housing Development:

16-3 – Minersville High Rise:

Francesco Palmeri – Unit 201

16-5 – Schuylkill Haven High Rise:

Tina Drey – Unit 310
William Breisch – Unit 603
Joan Fisher – Unit 309
Charles Lech – Unit 409

16-7 – Shenandoah High Rise:

Joanne Negron – Unit 611

16-8 Shenandoah Family Development:

Jaclyn Sallade – Unit 104

16-10 – Cass-Minersville Family Development:

Noel Barber – Unit 690
Jermisha Barber – Unit 690

16-12 – St. Clair Family Development:

16-13 – Schuylkill Haven Family Development:

16-14 – Ashland High Rise:

Douglas Johnson – Unit 311
Nancy Yanacek – Unit 311

RESIDENT ADVISORY BOARD MEETING:

COMMENTS ON ANNUAL PLAN
RESIDENT ADVISORY BOARD MEETING
Schuylkill Haven High Rise

Violence Against Women Act Policy Updated

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 Reauthorization Act of 2022 (“VAWA 2022”) (34 U.S.C. § 12491) 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.

Consultation with appropriate stakeholders

“Appropriate stakeholders include but are not limited to, (A) individuals and organizations with expertise in the housing needs and experiences of victims of domestic violence, dating violence, sexual assault and stalking; and (B) individuals and organizations with expertise in the administration or management of covered housing programs, including industry stakeholders and public housing agencies.

Schuylkill Hope Center for Victims of Domestic Violence Schuylkill Hope Center for Victims of Domestic Violence (formerly known as Schuylkill Women in Crisis) is 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:

Affiliated individual - The term “affiliated individual” means, with respect to an individual--

- A. a spouse, parent, sibling, or child of that individual, or an individual to whom that individual stands in loco parentis; or
- B. any individual, tenant, or lawful occupant living in the household of that individual.

Covered Housing Program(s): For the purposes of this Policy, the term “covered housing program” means: any Federal housing programs providing affordable housing to low- and moderate-income persons by means of restricted rents or rental assistance, or more generally providing affordable housing opportunities, as identified by the appropriate agency through regulations, notices, or any other means, as owned and/or managed by the Schuylkill County Housing Authority (SCHA).

Domestic Violence. -The term 'domestic violence' includes felony or misdemeanor crimes committed by a current or former spouse or intimate partner of the victim under the family or domestic violence laws of the jurisdiction receiving grant funding and, in the case of victim services, includes the use or attempted use of physical abuse or sexual abuse, or a pattern of any other coercive behavior committed, enabled, or solicited to gain or maintain power and control over a victim, including verbal, psychological, economic, or technological abuse that may or may not constitute criminal behavior, by a person who-

- A. is a current or former spouse or intimate partner of the victim, or person similarly situated to a spouse of the victim;
- B. is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner;
- C. shares a child in common with the victim; or
- D. commits acts against a youth or adult victim who is protected from those acts under the family or domestic violence laws of the jurisdiction.

- **Economic Abuse.**-The term 'economic abuse', in the context of domestic violence, dating violence, and abuse in later life, means behavior that is coercive, deceptive, or unreasonably controls or restrains a person's ability to acquire, use, or maintain economic resources to which they are entitled, including using coercion, fraud, or manipulation to-(A) restrict a person's access to money, assets, credit, or financial information; (B) unfairly use a person's personal economic resources, including money, assets, and

credit, for one's own advantage; or (C) exert undue influence over a person's financial and economic behavior or decisions, including forcing default on joint or other financial obligations, exploiting powers of attorney, guardianship, or conservatorship, or failing or neglecting to act in the best interests of a person to whom one has a fiduciary duty.

- **Technological Abuse.**—The term 'technological abuse' means an act or pattern of behavior that occurs within domestic violence, sexual assault, dating violence or stalking and is intended to harm, threaten, intimidate, control, stalk, harass, impersonate, exploit, extort, or monitor, except as otherwise permitted by law, another person, that occurs using any form of technology, including but not limited to: internet enabled devices, online spaces and platforms, computers, mobile devices, cameras and imaging programs, apps, location tracking devices, or communication technologies, or any other emerging technologies.

Dating violence means violence committed by a person—

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

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

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

Prohibited basis for denial or termination of assistance or eviction

2. **In general:** An applicant for or tenant of housing assisted may not be denied admission to, denied assistance under, terminated from participation in, or evicted from the housing on the basis that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the applicant or tenant otherwise qualifies for admission, assistance, participation, or occupancy.
3. **Construction of lease terms:** An incident of actual or threatened domestic violence, dating violence, sexual assault, or stalking shall not be construed as--

- A. a serious or repeated violation of a lease for housing by the victim or threatened victim of such incident; or
 - B. good cause for terminating the assistance, tenancy, or occupancy rights to housing of the victim or threatened victim of such incident.
4. **Termination on the basis of criminal activity**
- A. **Denial of assistance, tenancy, and occupancy rights prohibited** No person may deny assistance, tenancy, or occupancy rights to housing a tenant solely on the basis of criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking that is engaged in by a member of the household of the tenant or any guest or other person under the control of the tenant, if the tenant or an affiliated individual of the tenant is the victim or threatened victim of such domestic violence, dating violence, sexual assault, or stalking.
 - B. **Bifurcation**
 - i. **In general** Notwithstanding subparagraph (A), SCHA may bifurcate a lease for the housing 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 relating to domestic violence, dating violence, sexual assault, or stalking against an affiliated individual or other individual, without evicting, removing, terminating assistance to, or otherwise penalizing a victim of such criminal activity who is also a tenant or lawful occupant of the housing.
 - ii. **Effect of eviction on other tenants:** If public housing agency evicts, removes, or terminates assistance to an individual under clause (i), and the individual is the sole tenant eligible to receive assistance, the public housing agency shall provide any remaining tenant or resident an opportunity to establish eligibility for the housing program. If a tenant or resident described in the preceding sentence cannot establish eligibility, the public housing agency shall provide the tenant or resident a reasonable time, as determined by the appropriate agency, to find new housing or to establish eligibility for housing under another housing program.
 - C. **Rules of construction:** Nothing in subparagraph (A) shall be construed--
 - i. to limit the authority of SCHA, when notified of a court order, to comply with a court order with respect to--
 - I. the rights of access to or control of property, including civil protection orders issued to protect a victim of domestic violence, dating violence, sexual assault, or stalking; or
 - II. the distribution or possession of property among members of a household in a case;

- ii. to limit any otherwise available authority of SCHA to evict or terminate assistance to a tenant for any violation of a lease not premised on the act of violence in question against the tenant or an affiliated person of the tenant, if the public housing agency or owner or manager does not subject an individual who is or has been a victim of domestic violence, dating violence, or stalking to a more demanding standard than other tenants in determining whether to evict or terminate;
- iii. to limit the authority to terminate assistance to a tenant or evict a tenant from housing program if SCHA can demonstrate that an actual and imminent threat to other tenants or individuals employed at or providing service to the property would be present if the assistance is not terminated or the tenant is not evicted; or
- iv. to supersede any provision of any Federal, State, or local law that provides greater protection than this section for victims of domestic violence, dating violence, sexual assault, or stalking.

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 the Admission and Continued Occupancy Policy for the Public Housing Program and the Administrative Plan for the Housing Choice Voucher Program with a request for an informal hearing or grievance hearing, whichever is applicable.

Documentation

5. **Request for documentation:** If an applicant for, or tenant of, housing assisted under a covered housing program represents to SCHA that the individual is entitled to protection under subsection (b), SCHA may request, in writing, that the applicant or tenant submit to the Authority a form of documentation described in paragraph (3).
6. **Failure to provide certification**
 - A. **In general:** If an applicant or tenant does not provide the documentation requested under paragraph (1) within 14 business days after the tenant receives a request in writing for such certification from SCHA, nothing in this subpart may be construed to limit the authority of the SCHA to--
 - i. deny admission by the applicant or tenant to the covered program;
 - ii. deny assistance under the covered program to the applicant or tenant;
 - iii. terminate the participation of the applicant or tenant in the covered program; or
 - iv. evict the applicant, the tenant, or a lawful occupant that commits violations of a lease.
 - B. **Extension** SCHA may extend the 14-day deadline under subparagraph (A) at its discretion.
7. **Form of documentation:** A form of documentation described in this paragraph is--
 - A. a certification form approved by the appropriate agency that--
 - i. states that an applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking;
 - ii. states that the incident of domestic violence, dating violence, sexual assault, or stalking that is the ground for protection under subsection (b) meets the requirements under subsection (b); and

- iii. includes the name of the individual who committed the domestic violence, dating violence, sexual assault, or stalking, if the name is known and safe to provide;
 - B. a document that--
 - i. is signed by--
 - I. an employee, agent, or volunteer of a victim service provider, an attorney, a medical professional, or a mental health professional from whom an applicant or tenant has sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of the abuse; and
 - II. the applicant or tenant; and
 - ii. states under penalty of perjury that the individual described in clause (i)(I) believes that the incident of domestic violence, dating violence, sexual assault, or stalking that is the ground for protection under subsection (b) meets the requirements under subsection (b);
 - C. a record of a Federal, State, tribal, territorial, or local law enforcement agency, court, or administrative agency; or
 - D. at the discretion of SCHA, a statement or other evidence provided by an applicant or tenant.
- 8. **Confidentiality:** Any information submitted to SCHA under this subsection, including the fact that an individual is a victim of domestic violence, dating violence, sexual assault, or stalking shall be maintained in confidence by SCHA and may not be entered into any shared database or disclosed to any other entity or individual, except to the extent that the disclosure is--
 - A. requested or consented to by the individual in writing;
 - B. required for use in an eviction proceeding under subsection (b); or
 - C. otherwise required by applicable law.
- 9. **Documentation not required:** Nothing in this subsection shall be construed to require SCHA to request that an individual submit documentation of the status of the individual as a victim of domestic violence, dating violence, sexual assault, or stalking.
- 10. **Compliance not sufficient to constitute evidence of unreasonable act:** Compliance with subsection (b) by SCHA based on documentation received under this subsection, shall not be sufficient to constitute evidence of an unreasonable act or omission by SCHA Nothing in this paragraph shall be construed to limit the liability of SCHA for failure to comply with subsection (b).
- 11. **Response to conflicting certification:** If SCHA receives documentation under this subsection that contains conflicting information, SCHA may require an applicant or tenant to submit third-party documentation, as described in subparagraph (B), (C), or (D) of paragraph (3).
- 12. **Preemption:** Nothing in this subsection shall be construed to supersede any provision of any Federal, State, or local law that provides greater

protection than this subsection for victims of domestic violence, dating violence, sexual assault, or stalking.

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 SCHAs 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. SCHAs 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 SCHAs choose to exercise this authority, SCHAs 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, SCHAs 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, SCHAs 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, SCHAs 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.

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 Resident Advisory Board (RAB) (as defined in 24 CFR 903.13);
- 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.

Deconcentration Policy

(As contained in the Authority's Admission and Occupancy Policy)

It is the policy of the Schuylkill County Housing Authority (SCHA) to provide for de-concentration of poverty and encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments. Toward this end, families will be skipped on the waiting list to reach other families with a lower or higher income. This will be accomplished in a uniform and non-discriminating manner.

The Housing Authority will affirmatively market housing to all eligible income groups. Lower income residents will not be steered toward lower income developments and higher income residents will not be steered toward higher income developments

Prior to the beginning of each fiscal year, the Housing Authority will analyze income levels of families residing in each development, the income levels of census tracts in which developments are located, and the income levels of families on the waiting list. Based on this analysis marketing strategies will be determined and de-concentration incentives implemented

DE-CONCENTRATION INCENTIVES: The Housing Authority may offer one or more incentives to encourage applicant families whose income classification would help to meet the de-concentration goals of a particular development.

Various incentives may be used at different times or under different conditions but will always be provided in a consistent and nondiscriminatory manner.

OFFER OF A UNIT: When a unit becomes available, the Housing Authority will contact the first family on the waiting list who has the highest priority for this type of unit or development and whose income category would help to meet the de-concentration of goal and/or the income targeting goals.

REJECTION OF UNIT: If, in making the offer to the family, the Housing Authority skipped over other families on the waiting list in order to meet a de-concentration goal or offered the family any other de-concentration incentive and the family rejects the

unit, the family will not lose its place on the waiting list and will not be otherwise penalized.

STANDARD FORM LLL

HUD FORM 50070

HUD FORM 50071

HUD FORM 50075-HP

HUD FORM 50075-5Y

HUD FORM 50077-CR

HUD FORM 50077-SL

