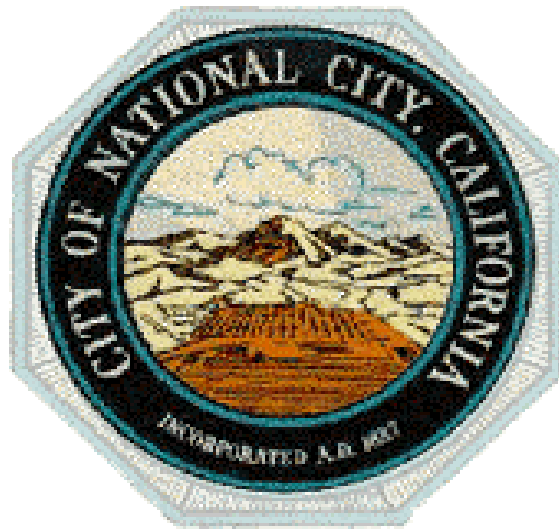


City of National City Community Development Commission

Public Housing Agency Plans
5-Year Plan for Fiscal Years 2000 - 2004
Annual Plan for Fiscal Year 2000



Executive Summary

[24 CFR Part 903.7 9 (r)]

The Quality Housing and Work Responsibility Act of 1998 requires all housing authorities to submit an Agency Plan in accordance with the format required by the U.S. Department of Housing and Urban Development (HUD). The Agency Plan is comprised of a Five-Year Plan and an Annual Plan.

The Five-Year Plan includes the City of National City Community Development Commission's mission statement, and goals and objectives for a five-year period beginning July 1, 2000.

The National City Community Development Commission (CDC) is a Section 8-Only Public Housing Agency (PHA). Pursuant of HUD regulations, the Annual Plan must include the following mandated components:

- Statement of Housing Needs
- Statement of Financial Resources
- Policies on Eligibility, Selection and Admissions
- Rent Determination Policies
- Operations and Management
- Grievance Procedures
- Homeownership Programs Administered by the PHA
- Community Service and Self-Sufficiency Programs
- Civil Rights Certifications
- Fiscal Audit

As a Section 8-Only PHA, the National City CDC has limited authority or financial resources to expand and preserve the affordable housing opportunities in the City. This Annual Plan describes the CDC's efforts as a PHA in providing rental assistance to very low income households. To present a comprehensive picture of the City's housing activities, the Annual Plan also highlights key programs administered by the CDC using non-PHA resources.

**PHA PLAN
AGENCY IDENTIFICATION**

PHA Name: City of National City Community Development Commission

PHA Number: CA116

PHA Fiscal Year Beginning: July 1, 2000

Public Access to Information

**Information regarding any activities outlined in this plan can be obtained by contacting:
(select all that apply)**

- Main administrative office of the PHA
- PHA development management offices
- PHA local offices

Display Locations for PHA Plans and Supporting Documents

The PHA Plans (including attachments) are available for public inspection at: (select all that apply)

- Main administrative office of the PHA
- PHA development management offices
- PHA local offices
- Main administrative office of the local government
- Main administrative office of the County government
- Main administrative office of the State government
- Public library
- PHA website
- Other (list below)

PHA Plan Supporting Documents are available for inspection at: (select all that apply)

- Main business office of the PHA
- PHA development management offices
- Other (list below)

5-YEAR PLAN
PHA FISCAL YEARS 2000 - 2004
[24 CFR Part 903.5]

A. Mission

- The mission of the PHA is the same as that of the Department of Housing and Urban Development: To promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.

B. Goals

HUD Strategic Goal: Increase the availability of decent, safe, and affordable housing.

- PHA Goal: Expand the supply of assisted housing
Objectives:
- Apply for additional rental vouchers:
 - Reduce public housing vacancies:
 - Leverage private or other public funds to create additional housing opportunities:
 - Acquire or build units or developments
 - Other (list below)
 - Provide an incentive to private property owners to rent to very low income families by offering timely assistance payments.

PHA Goal: Improve the quality of assisted housing

Objectives:

- Improve public housing management: (PHAS score)
- Improve voucher management: (SEMAP score)
- Increase customer satisfaction:
- Concentrate on efforts to improve specific management functions: (list; e.g., public housing finance; voucher unit inspections)
- Renovate or modernize public housing units:
- Demolish or dispose of obsolete public housing:
- Provide replacement public housing:
- Provide replacement vouchers:
- Other: (list below)

- PHA Goal: Increase assisted housing choices
- Objectives:
 - Provide voucher mobility counseling:
 - Conduct outreach efforts to potential voucher landlords
 - Increase voucher payment standards
 - Implement voucher homeownership program:
 - Implement public housing or other homeownership programs:
 - Implement public housing site-based waiting lists:
 - Convert public housing to vouchers:
 - Other: (list below)

HUD Strategic Goal: Improve community quality of life and economic vitality

- PHA Goal: Provide an improved living environment
- Objectives:
 - Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments:
 - Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments:
 - Implement public housing security improvements:
 - Designate developments or buildings for particular resident groups (elderly, persons with disabilities)
 - Other: (list below)
 - Assist the local economy by increasing the occupancy rate and the amount of money flowing into the community.

HUD Strategic Goal: Promote self-sufficiency and asset development of families and individuals

- PHA Goal: Promote self-sufficiency and asset development of assisted households
- Objectives:
 - Increase the number and percentage of employed persons in assisted families:
 - 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.
 - Other: (list below)

HUD Strategic Goal: Ensure Equal Opportunity in Housing for all Americans

- PHA Goal: Ensure equal opportunity and affirmatively further fair housing
- Objectives:
- Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability:
 - Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability:
 - Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required:
 - Other: (list below)

Other PHA Goals and Objectives: (list below)

Annual PHA Plan
PHA Fiscal Year 2000
[24 CFR Part 903.7]

Annual Plan Type:

Standard Plan

Streamlined Plan:

High Performing PHA

Small Agency (<250 Public Housing Units)

Administering Section 8 Only

Troubled Agency Plan

Executive Summary for the Action Plan

As a Section 8-Only Public Housing Agency (PHA), the National City Community Development Commission (CDC) has limited authority or financial resources to expand and preserve the affordable housing opportunities in the City. However, the CDC serves also as the City's Redevelopment Agency (RA). As the RA, the CDC aggressively pursues the construction and rehabilitation of affordable housing, and provides affordable homeownership opportunities to low and moderate income households using redevelopment housing set-aside, HOME, and CDBG funds. This Annual Plan describes the CDC's efforts as a PHA in providing rental assistance to low income households. To present a comprehensive picture of the City's housing activities, the Annual Plan also highlights key programs administered by the CDC using non-PHA resources.

Annual Plan Table of Contents

[24 CFR Part 903.7 9 (r)]

Table of Contents

| | <u>Page #</u> |
|---|---------------|
| Annual Plan | |
| Executive Summary..... | 1 |
| Annual Plan Table of Contents..... | 2 |
| Supportive Documents Available for Review..... | 3 |
| 1. Statement of Housing Needs..... | 6 |
| 2. Statement of Financial Resources..... | 12 |
| 3. Policies on Eligibility, Selection and Admissions..... | 13 |
| 4. Rent Determination Policies..... | 17 |
| 5. Operations and Management..... | 18 |
| 6. Grievance Procedures..... | 19 |
| 7. Homeownership Programs Administered by the PHA..... | 20 |
| 8. Community Service and Self-Sufficiency Programs..... | 21 |
| 9. Civil Rights Certifications..... | 23 |
| 10. Fiscal Audit..... | 23 |
| 11. Other Information..... | 23 |

Attachments

Required Attachments:

- Admissions Policy for Deconcentration (Attachment A)
- FY 2000 Capital Fund Program Annual Statement
- Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)

Optional Attachments:

- PHA Management Organizational Chart (Integrated in Action Plan)
- FY 2000 Capital Fund Program 5 Year Action Plan
- Public Housing Drug Elimination Program (PHDEP) Plan
- Comments of Resident Advisory Board or Boards)
- Other (List below, providing each attachment name)

- Statement of Policies and Objectives (Attachment B)

Supporting Documents Available for Review

| List of Supporting Documents Available for Review | | |
|--|---|--|
| Applicable & On Display | Supporting Document | Applicable Plan Component |
| ✓ | PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations | 5 Year and Annual Plans |
| ✓ | State/Local Government Certification of Consistency with the Consolidated Plan | 5 Year and Annual Plans |
| ✓ | Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions' initiatives to affirmatively further fair housing that require the PHA's involvement. | 5 Year and Annual Plans |
| ✓ | Consolidated Plan for the jurisdiction/s in which the PHA is located (which includes the Analysis of Impediments to Fair Housing Choice (AI)) and any additional backup data to support statement of housing needs in the jurisdiction | Annual Plan: Housing Needs |
| | Most recent board-approved operating budget for the public housing program | Annual Plan: Financial Resources; |
| | Public Housing Admissions and (Continued) Occupancy Policy (A&O), which includes the Tenant Selection and Assignment Plan [TSAP] | Annual Plan: Eligibility, Selection, and Admissions Policies |
| ✓ | Section 8 Administrative Plan | Annual Plan: Eligibility, Selection, and Admissions Policies |
| | Public Housing Deconcentration and Income Mixing Documentation: PHA board certifications of compliance with deconcentration requirements (section 16(a) of the US Housing Act of 1937, as implemented in the 2/18/99 <i>Quality Housing and Work Responsibility Act Initial Guidance; Notice</i> and any further HUD guidance) and 18. Documentation of the required deconcentration and income mixing analysis | Annual Plan: Eligibility, Selection, and Admissions Policies |
| | Public housing rent determination policies, including the methodology for setting public housing flat rents check here if included in the public housing A & O Policy | Annual Plan: Rent Determination |
| | Schedule of flat rents offered at each public housing development check here if included in the public housing A & O Policy | Annual Plan: Rent Determination |

| List of Supporting Documents Available for Review | | |
|--|---|---|
| Applicable & On Display | Supporting Document | Applicable Plan Component |
| ✓ | Section 8 rent determination (payment standard) policies ✓ check here if included in Section 8 Administrative Plan | Annual Plan: Rent Determination |
| | Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation) | Annual Plan: Operations and Maintenance |
| | Public housing grievance procedures check here if included in the public housing A & O Policy | Annual Plan: Grievance Procedures |
| ✓ | Section 8 informal review and hearing procedures ✓ check here if included in Section 8 Administrative Plan | Annual Plan: Grievance Procedures |
| | The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year | Annual Plan: Capital Needs |
| | Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant | Annual Plan: Capital Needs |
| | Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment (provided at PHA option) | Annual Plan: Capital Needs |
| | Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any other approved proposal for development of public housing | Annual Plan: Capital Needs |
| | Approved or submitted applications for demolition and/or disposition of public housing | Annual Plan: Demolition and Disposition |
| | Approved or submitted applications for designation of public housing (Designated Housing Plans) | Annual Plan: Designation of Public Housing |
| | Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act | Annual Plan: Conversion of Public Housing |
| | Approved or submitted public housing homeownership programs/plans | Annual Plan: Homeownership |
| | Policies governing any Section 8 Homeownership program check here if included in the Section 8 Administrative Plan | Annual Plan: Homeownership |
| | Any cooperative agreement between the PHA and the TANF agency | Annual Plan: Community Service & Self-Sufficiency |
| ✓ | FSS Action Plan/s for public housing and/or Section 8 | Annual Plan: Community Service & Self-Sufficiency |
| | Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports | Annual Plan: Community Service & Self-Sufficiency |

| List of Supporting Documents Available for Review | | |
|--|---|--|
| Applicable & On Display | Supporting Document | Applicable Plan Component |
| | The most recent Public Housing Drug Elimination Program (PHEDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan) | Annual Plan: Safety and Crime Prevention |
| | The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U. S.C. 1437c(h)), the results of that audit and the PHAs response to any findings | Annual Plan: Annual Audit |
| | Troubled PHAs: MOA/Recovery Plan | Troubled PHAs |
| | Other supporting documents (optional) (list individually; use as many lines as necessary) | (specify as needed) |

1. Statement of Housing Needs

[24 CFR Part 903.7 9 (a)]

A. Housing Needs of Families in the Jurisdiction/s Served by the PHA

| Housing Needs of Families in the Jurisdiction by Family Type | | | | | | | |
|---|---------|--------------------|--------|---------|--------------------|------|----------|
| Family Type | Overall | Afford- ability | Supply | Quality | Access- ibility | Size | Location |
| Income <= 30% of AMI | 2,242 | 4 | 4 | 5 | 2 | 5 | 4 |
| Income >30% but <=50% of AMI | 1,670 | 4 | 4 | 5 | 2 | 5 | 4 |
| Income >50% but <80% of AMI | 1,530 | 2 | 4 | 4 | 2 | 5 | 3 |
| Elderly | 620 | 3 | 3 | 4 | 3 | 2 | 2 |
| Families with Disabilities | N/A | 5 | 4 | 3 | 5 | 2 | 5 |
| Hispanic | 2,835 | 4 | 4 | 5 | 2 | 5 | 4 |
| White | 1,075 | 4 | 4 | 5 | 2 | 4 | 4 |
| Asian and Other | 996 | 4 | 4 | 5 | 2 | 5 | 4 |
| Black | 524 | 4 | 4 | 5 | 2 | 4 | 4 |

What sources of information did the PHA use to conduct this analysis? (Check all that apply; all materials must be made available for public inspection.)

- Consolidated Plan of the Jurisdiction/s
Indicate year: 1995-1999
- U.S. Census data: the Comprehensive Housing Affordability Strategy (CHAS) Data Book
- American Housing Survey data
Indicate year: _____
- Other housing market study
Indicate year: _____
- Other sources: (list and indicate year of information)

A. Housing Needs of Families on the Public Housing and Section 8 Tenant- Based Assistance Waiting Lists

| Housing Needs of Families on the Waiting List | | | |
|---|---------------|---------------------|--|
| Waiting list type: (select one) <input checked="" type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction: | | | |
| | # of families | % of total families | Annual Turnover |
| Waiting list total | 1,326 | 100.0% | Unable to compile accurate information |
| Extremely low income <=30% AMI | 974 | 73.5% | |
| Very low income (>30% but <=50% AMI) | 328 | 24.7% | |
| Low income (>50% but <80% AMI) | 24 | 1.8% | |
| Families with children | 1,058 | 79.8% | |
| Elderly families | 155 | 11.7% | |
| Families with Disabilities | 266 | 20.1% | |
| Hispanic | 1,026 | 77.4% | |
| White | 141 | 10.6% | |
| Asian/Other | 9 | 0.7% | |
| Black | 150 | 11.3% | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |
| 1BR | | | |
| 2 BR | | | |
| 3 BR | | | |
| 4 BR | | | |
| 5 BR | | | |
| 5+ BR | | | |
| Is the waiting list closed (select one)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No National City CDC maintains an open waiting list for the Section 8 program. If yes: B. How long has it been closed (# of months)? Does the PHA expect to reopen the list in the PHA Plan year? No Yes Does the PHA permit specific categories of families onto the waiting list, Even if generally closed? No Yes | | | |

C. Strategy for Addressing Needs

The National City Community Development Commission (CDC) is a Section 8-only Public Housing Authority (HA). As a HA, the CDC has no funding or authority to develop affordable housing. However, the CDC is also the Redevelopment Agency (RA) of the City of National City. As a RA, CDC addresses the shortage of affordable housing through a variety of programs administered by the National City Community Development Commission (CDC). These include:

- Community Development Block Grant
- HOME Investment Partnership
- Redevelopment Housing Set Aside

The CDC aggressively pursues affordable housing projects, expanding affordable housing opportunities through the provision of rehabilitation and first-time homebuyer assistance, new construction of housing, and acquisition and rehabilitation of existing housing. The CDC works with a variety of nonprofit housing developers in providing affordable housing, including the Habitat for Humanity and South Bay Community Services.

The following strategies apply only to the Housing Authority.

(1) Strategies

Need: Shortage of affordable housing for all eligible populations

Strategy 1. Maximize the number of affordable units available to the PHA within its current resources by:

- _____ Employ effective maintenance and management policies to minimize the number of public housing units off-line
- _____ Reduce turnover time for vacated public housing units
- _____ Reduce time to renovate public housing units
- _____ Seek replacement of public housing units lost to the inventory through mixed finance development
- _____ Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources
- ✓ _____ Maintain or increase section 8 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 PHA, regardless of unit size required
- ✓ _____ Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- ✓ _____ Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program

- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies
- Other (list below)

Strategy 2: Increase the number of affordable housing units by:

- Apply for additional section 8 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 Section 8 tenant-based assistance.
- Other: (list below)

Need: Specific Family Types: Families at or below 30% of median

Strategy 1: Target available assistance to families at or below 30 % of AMI

- Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing
- Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance
- Employ admissions preferences aimed at families with economic hardships
- Adopt rent policies to support and encourage work
- Other: (list below)
Many applicants on the Section 8 waiting list have income below 30% of the AMI. The CDC will ensure that 75% of the families at or below 30% of the AMI will be targeted for admission.

Need: Specific Family Types: Families at or below 50% of median

Strategy 1: Target available assistance to families at or below 50% of AMI

- Employ admissions preferences aimed at families who are working
- Adopt rent policies to support and encourage work
- Other: (list below)

Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

- Seek designation of public housing for the elderly

___ Apply for special-purpose vouchers targeted to the elderly, should they become available

Other: (list below)

The City has assisted in the development of two senior housing projects – Morgan-Kimball Towers and TELACU South. Morgan-Kimball Towers were developed with a HUD Section 231 (HODAG) loan with project-based Section 8 assistance. TELACU South was developed with a Section 202/811 loan and CDC redevelopment housing set-aside funds. Combined, Morgan-Kimball Towers and TELACU South provide affordable housing to more than 220 low income seniors.

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

___ Seek designation of public housing for families with disabilities

___ Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public 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

___ Other: (list below)

Need: Specific Family Types: Races or ethnicities with disproportionate housing needs

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

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

The National City CDC works with community-based organizations (CBOs) to affirmatively market the Section 8 program to minority households. Specifically, the CDC works with two organizations – the Metropolitan Area Advisory Project (MAAC) and Samahan Clinic – to outreach to minority households.

___ Other: (list below)

Strategy 2: Conduct activities to affirmatively further fair housing

- Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- Market the section 8 program to owners outside of areas of poverty /minority concentrations

The National City CDC participates in apartment owner workshops organized by the San Diego Area Commission. These workshops outreach to owners outside of areas of poverty/minority concentrations.

_____ Other: (list below)

Other Housing Needs & Strategies: (list needs and strategies below)

(2) Reasons for Selecting Strategies

Of the factors listed below, select all that influenced the PHAs selection of the strategies it will pursue:

- Funding constraints
- Staffing constraints
- _____ Limited availability of sites for assisted housing
- _____ Extent to which particular housing needs are met by other organizations in the community
- Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- _____ Influence of the housing market on PHA programs
- _____ Community priorities regarding housing assistance
- _____ Results of consultation with local or state government
- _____ Results of consultation with residents and the Resident Advisory Board
- _____ Results of consultation with advocacy groups
- _____ Other: (list below)

2. Statement of Financial Resources

[24 CFR Part 903.7 9 (b)]

| Financial Resources: Planned Sources and Uses | | |
|---|--------------------|---|
| Sources | Planned \$ | Planned Uses |
| 1. Federal Grants (FY 2000 grants) | | |
| a) Public Housing Operating | N/A | |
| b) Public Housing Capital Fund | N/A | |
| c) HOPE VI Revitalization | N/A | |
| d) HOPE VI Demolition | N/A | |
| e) Annual Contributions for Section 8 Tenant Based Assistance | \$5,293,279 | |
| f) Public Housing Drug Elimination Program (including any Technical Assistance funds) | N/A | |
| g) Resident Opportunity and Self-Sufficiency Grants | N/A | |
| h) Community Development Block Grant | \$1,411,000 | Housing rehabilitation assistance |
| i) HOME | \$633,000 | First-time homebuyers assistance; acquisition/rehabilitation; transitional housing for victims of domestic violence |
| Other Federal Grants (list below) | N/A | |
| 2. Prior Year Federal Grants (unobligated funds only) (list below) | \$0 | |
| 3. Public Housing Dwelling Rental Income | N/A | |
| 4. Other income (list below) | N/A | |
| 5. Non-federal sources (list below) | | |
| Redevelopment Housing Set-Aside Funds (estimated) | \$1,310,556 | Acquisition/rehabilitation; new constructions of housing |
| Total resources | \$8,647,835 | |

3. Policies on Eligibility, Selection and Admissions

A. Section 8

(1) Eligibility

- a. What is the extent of screening conducted by the PHA? (select all that apply)
- Criminal or drug-related activity only to the extent required by law or regulation
- Criminal and drug-related activity, more extensively than required by law or regulation
- More general screening than criminal and drug-related activity (list factors below)
- Other (list below)
- b. Yes No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?
- c. Yes No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?
- d. Yes No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source)
- e. Indicate what kinds of information you share with prospective landlords? (select all that apply)
- Criminal or drug-related activity
- Other (describe below)
- Last three addresses
 - Number of claims filed against the participant
 - Total \$ amount paid in claims against participant

(2) Waiting List Organization

- a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged? (select all that apply)
- None
- Federal public housing
- Federal moderate rehabilitation
- Federal project-based certificate program
- Other federal or local program (list below)
- b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply)
- PHA main administrative office
- Other (list below)

(3) Search Time

a. Yes No: Does the PHA give extensions on standard 60-day period to search for a unit?

If yes, state circumstances below:

The National City CDC allows a voucher recipient 120 days to search for a unit. The CDC received notification from HUD for permission to extend the search period beyond 120 days. Currently, due to the strong rental market in the area, some voucher recipients may need more than 120 day to search for adequate housing and apartment owners willing to participate in the Section 8 program.

(4) Admissions Preferences

a. Income targeting

Yes No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 75% of all new admissions to the section 8 program to families at or below 30% of median area income?

b. Preferences

1. Yes No: Has the PHA established preferences for admission to section 8 tenant-based assistance? (other than date and time of application) (if no, skip to subcomponent **(5) Special purpose section 8 assistance programs**)

2. Which of the following admission preferences does the PHA plan to employ in the coming year? (Select all that apply from either former Federal preferences or other preferences)

Former Federal preferences

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden (rent is > 50 percent of income)

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans families
- Residents who live and/or work in your jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs

- Victims of reprisals or hate crimes
- Other preference(s) (list below)
 - Involuntarily Displaced
 - Elderly (62 years or older) and Disabled

3. If the PHA will employ admissions preferences, please prioritize by placing a 1 in the space that represents your first priority, a 2 in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use 1 more than once, 2 more than once, etc.

Former Federal preferences

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- 3 Veterans and veterans families
- 1 Residents who live and/or work in your jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- 2 Other preference(s) (list below)
 - Involuntarily Displaced
 - Elderly (62 years or older) and Disabled

- Action by a housing owner which is beyond an applicant's ability to control, and which occurs despite the applicant's having met all previous conditions of occupancy, and is other than a rent increase
- Displacement by inaccessibility of unit
- Displacement because of HUD disposition of multifamily project by HUD under Section 203 of the Housing and Community Development Amendments of 1978
- Applicants who are currently serving in the U.S. Armed forces

4. Among applicants on the waiting list with equal preference status, how are applicants selected? (Select one)

- Date and time of application
- Drawing (lottery) or other random choice technique

5. If the PHA plans to employ preferences for residents who live and/or work in the jurisdiction (Select one)

- This preference has previously been reviewed and approved by HUD
 The PHA requests approval for this preference through this PHA Plan

6. Relationship of preferences to income targeting requirements: (select one)

- The PHA applies preferences within income tiers
 Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

(5) Special Purpose Section 8 Assistance Programs

a. In which documents or other reference materials are the policies governing eligibility, selection, and admissions to any special-purpose section 8 program administered by the PHA contained? (select all that apply)

- The Section 8 Administrative Plan
 Briefing sessions and written materials
 Other (list below)

a. How does the PHA announce the availability of any special-purpose section 8 programs to the public?

- Through published notices
 Other (list below)
- Distribute fact sheets to the broadcasting media
 - Initiate personal contacts with members of the news media and community service personnel
 - Utilization of public service announcements
 - Share information with other service providers in the community

4. Rent Determination Policies

[24 CFR Part 903.7 9 (d)]

A. Section 8 Tenant-Based Assistance

(1) Payment Standards

a. What is the PHAs payment standard? (select the category that best describes your standard)

- At or above 90% but below 100% of FMR
- 100% of FMR
- Above 100% but at or below 110% of FMR
- Above 110% of FMR (if HUD approved; describe circumstances below)

b. If the payment standard is lower than FMR, why has the PHA selected this standard? (select all that apply)

- FMRs are adequate to ensure success among assisted families in the PHA's segment of the FMR area
- The PHA has chosen to serve additional families by lowering the payment standard
- Reflects market or submarket
- Other (list below)

c. If the payment standard is higher than FMR, why has the PHA chosen this level? (select all that apply)

- FMRs are not adequate to ensure success among assisted families in the PHA's segment of the FMR area
- Reflects market or submarket
- To increase housing options for families
- Other (list below)

d. How often are payment standards reevaluated for adequacy? (select one)

- Annually
- Other (list below)

e. What factors will the PHA consider in its assessment of the adequacy of its payment standard? (select all that apply)

- Success rates of assisted families
- Rent burdens of assisted families
- Other (list below)
- The CDC will compare the payment standard to average rents in its Rent Reasonableness Data Base and to the average Contract Rents by units size. The Payment Standards should be on a par with these amounts.

(2) Minimum Rent

a. What amount best reflects the PHAs minimum rent? (select one)

- \$0
- \$1-\$25
- \$26-\$50

b. Yes No: Has the PHA adopted any discretionary minimum rent hardship exemption policies? (if yes, list below)

5. Operations and Management

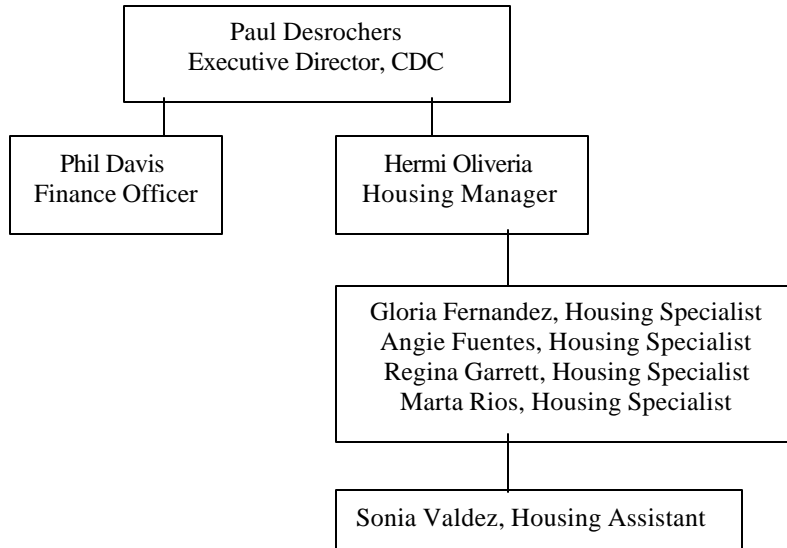
[24 CFR Part 903.7 9 (e)]

A. PHA Management Structure

(select one)

- An organization chart showing the PHAs management structure and organization is attached.
- A brief description of the management structure and organization of the PHA follows:

**National City
Community Development Commission
Management Organization**



B. HUD Programs Under PHA Management

| Program Name | Units or Families Served at Year Beginning | Expected Turnover |
|---|---|--------------------------|
| Public Housing | NA | NA |
| Section 8 Vouchers | 1,067 | 300/year |
| Section 8 Certificates | | |
| Section 8 Mod Rehab | 0 | 0 |
| Special Purpose Section 8 Certificates/Vouchers (list individually) | 0 | 0 |
| Public Housing Drug Elimination Program (PHDEP) | NA | NA |
| Other Federal Programs(list individually) | | |

C. Management and Maintenance Policies

- (1) Public Housing Maintenance and Management: (list below)
- (2) Section 8 Management: (list below)

The Administrative Plan for the Section 8 Certificate and Voucher Programs adopted by the National City Community Development Commission (CDC) on May 7, 1996 sets forth the CDC’s local policies for operation of the Section 8 housing programs. The Statement of Policies from the Administrative Plan has been included as Attachment B to this Plan.

6. Grievance Procedures

A. Section 8 Tenant-Based Assistance

1. ___ Yes No: Has the PHA established informal review procedures for applicants to the Section 8 tenant-based assistance program and informal hearing procedures for families assisted by the Section 8 tenant-based assistance program in addition to federal requirements found at 24 CFR 982?

If yes, list additions to federal requirements below:

2. Which PHA office should applicants or assisted families contact to initiate the informal review and informal hearing processes? (select all that apply)

PHA main administrative office

_____ Other (list below)

7. Homeownership Programs Administered by the PHA

A. Section 8 Tenant Based Assistance

1. _____ Yes No: Does the PHA plan to administer a Section 8 Homeownership program pursuant to Section 8(y) of the U.S.H.A. of 1937, as implemented by 24 CFR part 982 ? (If No, skip to component 8; if yes, describe each program using the table below (copy and complete questions for each program identified), unless the PHA is eligible to complete a streamlined submission due to high performer status. **High performing PHAs** may skip to component 8.)

2. Program Description:

a. Size of Program

_____ Yes _____ No: Will the PHA limit the number of families participating in the section 8 homeownership option? If the answer to the question above was yes, which statement best describes the number of participants? (select one)

_____ 25 or fewer participants

_____ 26 - 50 participants

_____ 51 to 100 participants

_____ more than 100 participants

b. PHA-established eligibility criteria

_____ No: Will the PHA's program have eligibility criteria for participation in its Section 8 Homeownership Option program in addition to HUD criteria? If yes, list criteria below: _____ Yes

8. Community Service and Self-sufficiency Programs

[24 CFR Part 903.7 9 (1)]

A. PHA Coordination with the Welfare (TANF) Agency

1. Cooperative agreements:

Yes No: Has the PHA entered into a cooperative agreement with the TANF Agency, to share information and/or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937)?

However, the National City CDC works with local colleges and Welfare Agency to share information and provide services. In 1993, the CDC signed a Memorandum of Understanding (MOU) with the Department of Social Services.

If yes, what was the date that agreement was signed?

2. Other coordination efforts between the PHA and TANF agency (select all that apply)

- Client referrals
- Information sharing regarding mutual clients (for rent determinations and otherwise)
- Coordinate the provision of specific social and self-sufficiency services and programs to eligible families
- Jointly administer programs
- Partner to administer a HUD Welfare-to-Work voucher program
- Joint administration of other demonstration program
- Other (describe)

B. Services and programs offered to residents and participants

(1) General

a. Self-Sufficiency Policies

Which, if any, of the following discretionary policies will the PHA employ to enhance the economic and social self-sufficiency of assisted families in the following areas? (select all that apply)

- Public housing rent determination policies
- Public housing admissions policies
- Section 8 admissions policies
- Preference in admission to section 8 for certain public housing families
- Preferences for families working or engaging in training or education programs for non-housing programs operated or coordinated by the PHA
- Preference/eligibility for public housing homeownership option participation
- Preference/eligibility for section 8 homeownership option participation

___ Other policies (list below)

b. Economic and Social self-sufficiency programs

___ Yes No: Does the PHA coordinate, promote or provide any programs to enhance the economic and social self-sufficiency of residents? (If yes, complete the following table; if no skip to sub-component 2, Family Self Sufficiency Programs. The position of the table may be altered to facilitate its use.)

| Services and Programs | | | | |
|--|----------------|--|--|---|
| Program Name & Description (including location, if appropriate) | Estimated Size | Allocation Method (waiting list/random selection/specific criteria/other) | Access (development office / PHA main office / other provider name) | Eligibility (public housing or section 8 participants or both) |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

(2) Family Self Sufficiency program/s

a. Participation Description

| Program | Required Number of Participants (start of FY 2000 Estimate) | Actual Number of Participants (As of: DD/MM/YY) |
|----------------|--|--|
| Public Housing | 0 | 0 |
| Section 8 | 25 | 19 participants and 5 graduates as of March 10, 2000 |

b. Yes ___ No: If the PHA is not maintaining the minimum program size required by HUD, does the most recent FSS Action Plan address the steps the PHA plans to take to achieve at least the minimum program size?

If no, list steps the PHA will take below:

9. Civil Rights Certifications

[24 CFR Part 903.7 9 (o)]

Civil rights certifications are included in the PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations.

10. Fiscal Audit

[24 CFR Part 903.7 9 (p)]

1. Yes No: Is the PHA required to have an audit conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h))? (If no, skip to component 17.)
2. Yes No: Was the most recent fiscal audit submitted to HUD?
3. Yes No: Were there any findings as the result of that audit?
4. Yes No: If there were any findings, do any remain unresolved?
If yes, how many unresolved findings remain? _____
5. Yes No: Have responses to any unresolved findings been submitted to HUD? If not, when are they due (state below)?

11. Other Information

[24 CFR Part 903.7 9 (r)]

A. Resident Advisory Board Recommendations

1. Yes No: Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?
2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)
 Attached at Attachment (File name)
 Provided below:
3. In what manner did the PHA address those comments? (select all that apply)
 Considered comments, but determined that no changes to the PHA Plan were necessary.
 The PHA changed portions of the PHA Plan in response to comments
 List changes below:
 Other: (list below)

B. Description of Election process for Residents on the PHA Board

1. ___ Yes No: Does the PHA meet the exemption criteria provided section 2(b)(2) of the U.S. Housing Act of 1937? (If no, continue to question 2; if yes, skip to sub-component C.)

2. ___ Yes No: Was the resident who serves on the PHA Board elected by the residents? (If yes, continue to question 3; if no, skip to sub-component C.)

Description of Resident Election Process

a. Nomination of candidates for place on the ballot: (select all that apply)

- Candidates were nominated by resident and assisted family organizations
- Candidates could be nominated by any adult recipient of PHA assistance
- Self-nomination: Candidates registered with the PHA and requested a place on ballot
- Other: (describe)

b. Eligible candidates: (select one)

- Any recipient of PHA assistance
- Any head of household receiving PHA assistance
- Any adult recipient of PHA assistance
- Any adult member of a resident or assisted family organization
- Other (list)

c. Eligible voters: (select all that apply)

- All adult recipients of PHA assistance (public housing and section 8 tenant-based assistance)
- Representatives of all PHA resident and assisted family organizations
- Other (list)

The National City has a Mayor-appointed Residents Advisory Committee (RAC) which advises the City on all matters relating to housing. The RAC had two Section 8 residents who have recently retired from the committee. Prospective Section 8 committee members were invited and participated in the PHA board meeting.

C. Statement of Consistency with the Consolidated Plan

1. Consolidated Plan jurisdiction: National City

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)

- The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- Other: (list below)

4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

- Provide affordable housing through new construction, acquisition/rehabilitation, and first-time homebuyer assistance.
- Preserve affordable housing through owner- and renter-housing rehabilitation assistance
- Provide fair housing and tenant/landlord counseling services
- Provide supportive housing services
- Provide transitional housing for victims of domestic violence

D. Other Information Required by HUD

None.

12. Definition of “Substantial Deviation” and “Significant Amendment or Modification” (903.7r):

The Community Development Commission of the City of National City has, in conjunction with the Resident Advisory Committee developed the following definitions, as required by 903.7(r):

“Substantial Deviation” from the Agency’s Five-Year Plan will include:

“Any change to the Agency’s Mission Statement.”

“Any change to a goal or objective that is included in the PHA Five-Year Plan that would have a substantive effect on the Section 8 participants. An example would be a decision not to apply for additional Section 8 vouchers even though the Five Year-Plan includes an objective calling for such application to expand supply of affordable housing.”

“Significant Amendment or Modification” to the Agency’s Five-Year or Annual Plan is defined as follows:

“Changes to local discretionary rent or admissions policies;”

“Changes to the organization of the waiting list;”

“Changes to the resident selection criteria;”

“Changes to the Grievance or Informal Hearing Procedures.”

NOTE: Any regulatory changes will be made to any PHA policies or procedures as a matter of ongoing administration and will not be considered to constitute a significant amendment or modification for the purposes of the PHA Agency Plan.

Attachments

Attachment A

Eligibility for Admission

ELIGIBILITY FOR ADMISSION

INTRODUCTION

This chapter defines both HUD's and the CDC's criteria for admission and denial of admission to the program. The policy of the CDC is to strive for objectivity and consistency in applying these criteria to evaluate the eligibility of families who apply. The CDC staff will review all information provided by the family carefully and without regard to factors other than those defined in this Chapter. Families will be provided the opportunity to explain their circumstances, to furnish additional information, if needed, and to receive an explanation of the basis for any decision made by the CDC pertaining to their eligibility.

The CDC may no longer elect not to comply with (opt-out) 24 CFR 5, Subpart E, which describes the requirements for restriction of assistance to non-citizens.

The Quality Housing and Work Responsibility Act of 1998 reversed the option and CDC must now comply with the Non-Citizen Rule. In addition, on May 12, 1999, the Federal Register, pages 25726-25733 published the Final Rule on Restriction on Assistance to Non-citizens. The final rule updates HUD's non-citizens regulations to incorporate the QHWRA. Specifically, CDC may elect not to affirmatively establish and verify eligibility before providing financial assistance to an individual or family.

However, the CDC must verify and establish eligibility no longer than the date of the family's annual reexamination following October 21, 1998.

Eligibility Factors [24 CFR 982.201(B)]

The CDC accepts applications only from families whose head or spouse is at least 18 years of age or emancipated minors under the State law.

To be eligible for participation, an applicant must meet HUD's criteria, as well as any permissible additional criteria established by the CDC.

The HUD eligibility criteria are:

An applicant must be a "family"

An applicant must be within the appropriate Income Limits

An applicant must furnish Social Security Numbers for all family members age six and older

An applicant must furnish declaration of Citizenship or Eligible Immigrant Status

and verification where required:

At least one member of the applicant family must be either a U.S. citizen or have eligible immigration status before the CDC may provide any financial assistance.

Reasons for denial of admission are addressed in the "Denial or Termination of Assistance" chapter. These reasons for denial constitute additional admission criteria.

The Family's initial eligibility for placement on the waiting list will be made in accordance with the eligibility factors.

Eligibility factors will not be verified before the family is placed on the waiting list.

Evidence of Citizenship/Eligible Immigrant Status will not be verified until the family is selected from the waiting list for final eligibility processing for issuance of a Voucher, unless the CDC determines that such eligibility is in question, whether or not the family is at or near the top of the waiting list.

A. FAMILY COMPOSITION [24 CFR 982.201]

The applicant must qualify as a Family. A Family may be a single person or a group of persons.

A "family" includes a family with or without a child or children. A group of persons consisting of two or more elderly persons or disabled persons living together, or one or more elderly or disabled persons living with one or more live-in aides is a family. The CDC determines if any other group of persons qualifies as a family.

A single person family may be:

An elderly person

A displaced person

A person with a disability

Individuals may not be considered disabled for eligibility purposes solely on the basis of drug or alcohol dependence.

Any other single person

A child who is temporarily away from home because of placement in foster care is considered a member of the family. This provision only pertains to the foster child's temporary absence from the home, and is not intended to artificially enlarge the space

available for other family members.

A family includes:

Two or more persons who intend to share residency whose income and resources are available to meet the family's needs.

Two or more persons who intend to share residency whose income and resources are available to meet the family's needs and who have a history as a family unit or show evidence as a stable family relationship.

Two or more elderly or disabled persons living together, or one or more elderly, near elderly or disabled persons living with one or more live-in aides is a family.

Head of Household

The head of household is the adult member of the household who is designated by the family as head, is wholly or partly responsible for paying rent, and has the legal capacity to enter into a lease under State/local law. Emancipated minors who qualify under State law will be recognized as head of household.

A family may designate an elderly or disabled family member as head of household solely to qualify the family as an Elderly or Disabled Household, provided that the person is at least partially responsible for paying the rent.

Spouse of Head

Spouse means the husband or wife of the head.

For proper application of the Non-citizens Rule, the definition of spouse is the marriage partner who, in order to dissolve the relationship, and would have to be divorced. It includes the partner in a common law marriage. The term "spouse" does not apply to boyfriends, girlfriends, significant others, or co-heads.

Co-Head

An individual in the household who is equally responsible for the lease with the Head of Household. A family may have a spouse or co-head, but not both. A co-head never qualifies as a dependent.

Live-in Attendants

A family may include a live-in aide provided that such live-in aide:

Is determined by the CDC to be essential to the care and well being of an elderly person, a near-elderly person, or a person with disabilities,

Is not obligated for the support of the person(s), and

Would not be living in the unit except to provide care for the person(s).

A live-in aide is treated differently than the family members:

Income of the live-in aide will not be counted for purposes of determining eligibility or level of benefits.

Live-in aides are not subject to Non-Citizen Rule requirements.

Live-in aides may not be considered as a remaining member of the tenant family.

Relatives are not automatically excluded from being live-in aides, but they must meet all of the elements in the live-in aide definition above.

A Live in Aide may only reside in the unit with the approval of the CDC. Written verification will be required from a reliable, knowledgeable professional, such as a doctor, social worker, or caseworker. The verification provider must certify that a live-in aide is needed for the care of the family member who is elderly (50-61) or disabled.

The CDC will approve a live-in aide if needed as a reasonable accommodation to make the program accessible to and usable by the family member with a disability. Approval of a live-in aide for reasonable accommodation will be in accordance with CFR 24 Part 8 and the reasonable accommodations section in Chapter 1 of this Administrative Plan.

Verification must include the hours the care will be provided.

At any time, CDC will refuse to approve a particular person as a live-in aide or may withdraw such approval if: (24 CFR 982.316)

The person commits fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program;

The person commits drug-related criminal activity or violent criminal activity; or

The person currently owes rent or another amounts to the CDC or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act.

Split Households Prior to Voucher Issuance

When a family on the waiting list splits into two otherwise eligible families due to divorce or legal separation and the new families both claim the same placement on the waiting list, and there is no court determination, the CDC will make the decision taking into consideration the following factors:

Which family member applied as head of the household.

Which family unit retains the children or any disabled or elderly members.

Restrictions that were in place at the time the family applied.

Role of domestic violence in the split.

Recommendations of social service agencies or qualified professionals such as children's protective services.

Documentation of these factors is the responsibility of the applicant families. If either or both of the families do not provide the documentation, they may be denied placement on the waiting list for failure to supply information requested by the CDC.

In cases where domestic violence played a role, the standard used for verification will be the same as that required for the "domestic violence" preference.

The CDC will require evidence that the family has been displaced as a result of fleeing violence in the home. Families are also eligible for this preference if there is proof that the family is currently living in a situation where they are being subjected to or victimized by violence in the home (See "Establishing Preferences and Maintaining the Waiting List " chapter).

Multiple Families in the Same Household

When families apply which consist of two families living together (such as a mother and father, and a daughter with her own husband or children), if they apply as a family unit, they will be treated as a family unit.

Joint Custody of Children

Children who are subject to a joint custody agreement but live with one parent at least 51% of the time will be considered members of the household. "51% of the time" is defined as 183 days of the year, which do not have to run consecutively.

There will be a self-certification required of families who claim joint custody or temporary guardianship.

When both parents are on the Waiting List and both are trying to claim the child, the parent whose address is listed in the school records will be allowed to claim the school – age child as a dependent

B. INCOME LIMITATIONS [24 CFR 982.201(b), 982.353]

To be eligible for assistance, an applicant:

Must be a family in the very low-income category, which is a family whose income does not exceed 50 percent of the area median income. The CDC will not admit families whose income exceeds 50 percent of the area median income except those families included in 24 CFR 982.201(b).

May be under the low-income limit in any of the following categories: [24 CFR 982.201(b)]

A low-income family that is continuously assisted under the 1937 Housing Act. An applicant is continuously assisted if the family has received assistance under any 1937 Housing Act program within 120 days of voucher issuance. Programs include any housing federally assisted under the 1937 Housing Act.

A low-income family physically displaced by rental rehabilitation activity under 24 CFR part 511.

A low-income non-purchasing family residing in a HOPE 1 or HOPE 2 project.

A low-income non-purchasing family residing in a project subject to a home-ownership programs under 24 CFR 248.173.

A low-income family or moderate-income family that is displaced as a result of the prepayment of a mortgage or voluntary termination of mortgage insurance contract under 24 CFR 248.165.

A low-income family that qualifies for Voucher assistance as a non-purchasing family residing in a project subject to a resident home ownership program.

To determine if the family is income-eligible, the CDC compares the Annual Income of the family to the applicable income limit for the family's size.

Families whose Annual Income exceeds the income limit will be denied admission and offered an informal review.

Single Jurisdiction Has: The applicable income limit to be used at initial issuance of a voucher is the income limit of the HA.

Portability: For initial lease-up, families who exercise portability must be within the very

low-income limit for the jurisdiction of the receiving HA in which they want to live.

C. MANDATORY SOCIAL SECURITY NUMBERS [24 CFR 5.216, 5.218]

Families are required to provide verification of Social Security Numbers for all family members age 6 and older prior to admission, if they have been issued a number by the Social Security Administration. This requirement also applies to persons joining the family after admission to the program.

Failure to furnish verification of social security numbers is grounds for denial or termination of assistance.

Persons who have not been issued a Social Security Number must sign a certification that they have never been issued a Social Security Number.

Persons who disclose their Social Security Number but cannot provide verification must sign a certification and provide verification within 60 days. Elderly persons must provide verification within 120 days.

D. CITIZENSHIP/ELIGIBLE IMMIGRATION STATUS [24 CFR Part 5, Subpart E]

In order to receive assistance, a family member must be a U.S. citizen or eligible immigrant. Individuals, who are neither, may elect not to contend their status. Eligible immigrants are persons who are in one of the immigrant categories as specified by HUD.

For the Citizenship/Eligible Immigration requirement, the status of each member of the family is considered individually before the family's status is defined.

Mixed Families. A family is eligible for assistance as long as at least one member is a citizen or eligible immigrant. Families that include eligible and ineligible individuals are called "mixed". Such applicant families will be given notice that their assistance will be pro-rated and that they may request a hearing if they contest this determination.

All Members Ineligible. Applicant families that include no eligible members are ineligible for assistance. Such families will be denied admission and offered an opportunity for a hearing.

Non-Citizen Students. Defined by HUD in the non-citizen regulations at 24 CFR 5.522. Not eligible for assistance.

Appeals. For this eligibility requirement only, the applicant is entitled to a hearing exactly like those provided for participants.

Verification of Status Before Admission

The CDC will provide assistance to families prior to the verification of eligibility for the individual or at least one member of the family pursuant to this section.

E. OTHER CRITERIA FOR ADMISSION [24 CFR 982.552(b)]

A family will not be admitted to the program if any member of the family has been evicted from federally assisted housing for serious violation of the lease within the past 2 years.

A family will be denied to the program if any member of the family fails to sign and submit consent forms for obtaining information required by the CDC, including Form HUD-9886.

The CDC will apply the following criteria, in addition to the HUD eligibility criteria, as grounds for denial of admission to the program:

The family must not have violated any family obligation during a previous participation in the Section 8 program for 5 five years prior to final eligibility determination.

When the CDC denies assistance to an applicant with a disability, the applicant may request a review of the family obligation that was violated, if the violation was a result of the disability.

The CDC may make an exception, if the family member who violated the family obligation is not a current member of the household on the application.

No family member may have committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program.

The family must not have violated the requirements under the family's Contract of participation in the Family Self-Sufficiency Program without good cause.

The family must pay any outstanding debt owed the CDC or another HA as a result of prior participation in any federal housing program within 30 days of CDC notice to pay.

The family must be in good standing regarding any current payment agreement made with another HA for a previous debt incurred, before the CDC will allow participation in its Section 8 program.

No member of the family may have engaged in drug related or violent criminal activity in the last five years.

The CDC will not be obligated to ferret out information concerning a family's

criminal activities as part of the processing of an application for assistance. Initial screening will be limited to routine inquiries of the family and any other information provided to the CDC regarding this matter. The inquiries will be standardized and directed to all applicants by inclusion in the application form.

If either as a result of the standardized inquiry or the receipt of a verifiable referral, there is indication that the family or any family member is engaged in drug-related criminal activity or violent criminal activity, the CDC may conduct closer inquiry to determine whether the family should be denied admission.

The CDC will check criminal history for all adults in the household to determine whether any member of the family has violated any of the prohibited behaviors as referenced in the section on One-Strike policy in the "Denial or Termination of Assistance" chapter.

If any applicant deliberately misrepresents the information on which eligibility or tenant rent is established, the CDC may deny assistance and may refer the family file/record to the proper authorities for appropriate disposition. (See Program Integrity Addendum)

No family member may have been engaged in or threatened abusive or violent behavior toward CDC personnel.

F. TENANT SCREENING [24 CFR 982.307]

The CDC will take into consideration any of the criteria for admission described on the "Denial or Termination of Assistance" chapter.

The CDC will not screen family behavior or suitability for tenancy. The CDC will not be liable or responsible to the owner or other persons for the family's behavior or the family's conduct in tenancy.

The owner is responsible for screening and selection of the family to occupy the owner's unit. At or before CDC approval of the tenancy, the CDC will inform the owner that screening and selection for tenancy is the responsibility of the owner.

The owner is responsible for screening families based on their tenancy histories, including such factors as: [24 CFR 982.307(a)(3)]

Payment of rent and utility bills

Caring for a unit and premises

Respecting the rights of other residents to the peaceful enjoyment of their housing

Drug-related criminal activity or other criminal activity that is a threat to the health, safety or property of others; and

Compliance with other essential conditions of tenancy.

The CDC will give the owner:

The family's current and prior address as shown in the CDC's records; and

The name and address (if known by the CDC) of the landlord at the family's current and prior address.

The CDC will offer the owner other information in the CDC's possession concerning the family, including:

Information about the family's tenancy history; or

Information about drug trafficking by family members.

The same type of information will be supplied to all owners.

The CDC will advise families how to file a complaint if they have been discriminated against by an owner. The CDC will advise the family to make a Fair Housing complaint. The CDC may also report the owner to HUD (Fair Housing/Equal Opportunity) or the local Fair Housing Organization.

G. CHANGES IN ELIGIBILITY PRIOR TO EFFECTIVE DATE OF THE CONTRACT

Changes that occur during the period between issuance of a voucher and lease up may affect the family's eligibility or share of the rental payment. For example, if a family goes over the income limit prior to lease up, the applicant will not continue to be eligible for the program. They will be notified in writing of their ineligible status and their right for an informal review.

H. INELIGIBLE FAMILIES

Families who are determined to be ineligible will be notified in writing of the reason for denial and given an opportunity to request an informal review, or an informal hearing is they were denied due to non-citizen status. See "Complaints and Appeals" chapter for additional information about reviews and hearings.

I. PROHIBITED ADMISSIONS CRITERIA [24 CFR 982.202(b)]

Admission to the program may not be on where the family lives before admission to the program.

Admission to the program may not be based on:

Where a family lives prior to admission to the program.

Where the family will live with assistance under the program.

Discrimination because members of the family are unwed parents, recipients of public assistance, or children born out of wedlock;

Discrimination because a family includes children;

Whether a family decides to participate in a family self-sufficiency program; or

Other reasons as listed in the "Statement of Policies and Objectives" chapter under the Fair Housing and Reasonable Accommodation sections.

Attachment B

Statement of Policies and Objectives

STATEMENT OF POLICIES AND OBJECTIVES

INTRODUCTION

The Section 8 Program was enacted as part of the Housing and Community Development Act of 1974, which recodified the U.S. Housing Act of 1937. The Act has been amended from time to time, and its requirements, as they apply to the Section 8 Tenant-Based Assistance Program, is described in and implemented throughout this Administrative Plan. The Section 8 Tenant-Based Assistance programs are federally funded and administered for the City of National City by the Community Development Commission through its Section 8 housing office.

Administration of the Section 8 program and the functions and responsibilities of the Community Development Commission (CDC) staff shall be in compliance with the CDC's Personnel Policy and the Department of Housing and Urban Development's (HUD) Section 8 Regulations as well as all Federal, State and local Fair Housing Laws and Regulations.

Jurisdiction

The jurisdiction of the Community Development Commission (CDC) is within the boundaries of the City of National City.

A. MISSION STATEMENT

The Community Development of the City of National City Mission Statement:
"To promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination."

B. LOCAL OBJECTIVES

The Section 8 Program is designed to achieve three major objectives:

- a. To provide decent, safe, and sanitary housing for every low income families while maintaining their rent payments at an affordable level.
- b. To promote freedom of housing choice and spatial deconcentration of very low income families of all races and ethnic backgrounds.
- c. To provide an incentive to private property owners to rent to very low income families by offering timely assistance payments.

In addition, the CDC has the following goals for the program:

- a. To assist the local economy by increasing the occupancy rate and the amount of money flowing to the community.
- b. To encourage self-sufficiency of participant families.
- c. To ensure equal opportunity and affirmatively further fair housing.
- d. To ensure maximum utilization of PHA program dollars and resources.

C. PURPOSE OF THE PLAN

The Purpose of the Administrative Plan is to establish policies for carrying out the

programs in a manner consistent with HUD requirements and local goals and objectives contained in the Agency Plan. The Housing Choice Voucher Program is implemented as of 10/1/99; pre-merger Regular Tenancy Contracts, Housing Voucher Contracts, and Over Fair Market Rent Tenancy Contracts will remain in effect until the family's second reexamination after the merger date or whenever a new lease is executed, whichever comes first.

The CDC is responsible for complying with all changes in HUD regulations pertaining to these programs. If such changes conflict with this Plan, HUD regulations will have precedence. The original Plan and any changes must be approved by the CDC Board of Commissioners and a copy provided to HUD.

This Administrative Plan is a supporting document to the CDC Agency Plan, and is available for public review as required by CFR 24 Part 903.

Applicable regulations include:

24 CFR Part 5: General Program Requirements

24 CFR Part 8: Nondiscrimination

24 CFR Part 982: Section 8 Tenant-Based Assistance

Local rules that are made part of this Plan are intended to promote local housing objectives consistent with the intent of the federal housing legislation.

D. FAIR HOUSING POLICY [24 CFR 982.54 (d) (6)]

It is the policy of the Housing Authority to comply fully with all Federal, State, and local nondiscrimination laws and with the rules and regulations governing Fair Housing and Equal Opportunity in housing and employment.

The CDC shall not deny any family or individual the opportunity to apply for or receive assistance under the Section 8 programs on the basis of race, color, sex, religion, creed, national or ethnic origin, age, family, marital status, handicap or disability, or sexual orientation.

To further its commitment to full compliance with applicable Civil Rights laws, the CDC will provide Federal/State/local information to Voucher holders regarding unlawful discrimination and any recourse available to families who believe they are victims of a discriminatory act. Such information will be available during the family briefing session, and all applicable Fair Housing Information and Discrimination

Complaint Forms will be made part of the Voucher holder's briefing packet and available upon request at the front desk.

All CDC staff will be required to attend fair housing training and informed of the importance of affirmatively furthering fair housing and providing equal opportunity to all families, including providing reasonable accommodations to persons with disabilities, as a part of the overall commitment to quality customer service. Fair Housing posters are posted throughout the CDC office, including the lobby and interview rooms and the equal opportunity logo will be used on all outreach materials. Staff will attend local fair housing update training sponsored by HUD and other local organization to keep current with new developments.

Heartland Human Relations, a contractor for the CDC, will audit complaints of discrimination, arbitrate between the owner and family, and refer families to the proper authorities, such as the State or HUD, where necessary.

Except as otherwise provided in 24 CFR 8.21©(1), 8.24(a), 8.25, and 8.31, no individual with disabilities shall be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination because to discrimination because the CDC's facilities are inaccessible to or unusable by persons with disabilities.

The CDC's offices are located at 140 E. 12th Street, Suite B, National City, California and are accessible to persons with disabilities. Accessibility for the hearing impaired is provided by the TTD/TDY telephone number.

E. SERVICE POLICY/ACCOMMODATIONS

It is the policy of the CDC to be service-directed in the administration of our housing programs, and to exercise and demonstrate a high level of professionalism while providing housing services to the families within our jurisdiction.

The CDC's policies and practices will be designed to provide assurances that all persons with disabilities will be provided reasonable accommodation, so that they may fully access and utilize the housing program and related services. The availability of specific accommodations will be made known by including notices on CDC forms and letters. This policy is intended to afford persons with disabilities an equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement as those who do not disabilities and is applicable to all situations described in this Administrative Plan including when a family initiates contact with the CDC, when the CDC initiates contact with a family including when a family applies, and when the CDC schedules or reschedules appointments of any kind.

To be eligible to request a reasonable accommodation, the requester must first certify or verify that they are a person with a disability under the following ADA definition:

A physical or mental impairment that substantially limits one or more of the major life activities of an individual;

A record of such impairment; or

Being regarded as having such an impairment

Note: This is not the same as the HUD definition used for purposes of determining allowances.

Rehabilitated former drug users and alcoholics are covered under the ADA. However, a current drug user is not covered. In accordance with 5.403, individuals are not considered disabled for eligibility purposes solely on the basis of any drug or alcohol dependence. Individuals whose drug or alcohol addiction is a material factor to their disability are excluded from the definition. Individuals are considered disabled if disabling mental and physical limitations would persist if drug or alcohol abuse discontinued.

Once the person's status as a qualified person with a disability is confirmed, the CDC will require that a professional third party competent to make the assessment, provides written verification that the person needs the specific accommodation due to their disability and the change is required for them to have equal access to the housing program.

If the CDC finds that the requested accommodation creates an undue administrative or financial burden, the CDC will deny the request and/or present an alternative accommodation that will still meet the need of the person.

An undue administrative burden is one that requires a fundamental alteration of the essential functions of the CDC (i.e., waiving a family obligation).

An undue financial burden is one that when considering the available resources of the agency as a whole, the requested accommodation would pose a severe financial hardship to the CDC.

The CDC will provide a written decision to the person requesting the accommodation within a reasonable time. If a person is denied the accommodation or feels that the alternative suggestions are inadequate, they may request an informal hearing to review the CDC's decision.

All CDC mailings will be made available in an accessible format upon request, as a reasonable accommodation.

The CDC utilizes organizations, which provide assistance for hearing- and sight-impaired persons when needed.

A list of accessible units will be provided.

Verification of Disability

The CDC will verify disabilities under definitions in the Fair Housing Amendments Act of 1988, Section 504 of the 1973 Rehabilitation Act, and Americans with Disabilities Act.

F. TRANSLATIONS OF DOCUMENTS

The CDC has bilingual staff to assist non-English speaking families in the following languages: Spanish and Tagalog; and translates documents into the following languages: Spanish.

In determining whether it is feasible to translate documents written in English into other languages, the CDC will consider the following factors:

Number of applicants and participants in the jurisdiction who do not speak English and speak the other language.

Estimated cost to CDC per client of translation of English written documents into the other language.

The availability of local organizations to provide translation services to non-English speaking families.

Availability of bilingual staff to provide translation for non-English speaking families.

G. MANAGEMENT ASSESSMENT OBJECTIVES

The CDC operates its housing assistance program with efficiency and can demonstrate to HUD auditors that the CDC is using its resources in a manner that reflects its commitment to quality and service. The CDC policies and practices are consistent with the areas of measurement for the following HUD SEMAP indicators:

Selection from the Waiting List

Reasonable Rent

Determination of Adjusted Income

Utility Allowance Schedule

HQS Quality Control Inspections

HQS Enforcement

Expanding Housing Opportunities

Payment Standards

Annual Reexamination

Correct Tenant Rent Calculations

Pre-Contract HQS Inspections

Annual HQS Inspections

Lease-up

Family Self Sufficiency Enrollment and Escrow Account Balances

Bonus Indicator De-concentration

Supervisory quality control reviews will be performed by a CDC Supervisor or other qualified person other than the person who performed the work, as required by HUD, on the following SEMAP factors:

Selection from the Waiting List

Rent Reasonableness

Determination of Adjusted Income

HQS Enforcement

HQS Quality Control

The annual sample of files and records will be drawn in an unbiased manner, leaving a clear audit trail.

The minimum sample size to be reviewed will relate directly to each factor.

H. FAMILY OUTREACH

The CDC will publicize and disseminate information to make known the availability of housing assistance and related services for very low-income families on a regular basis. When the CDC's waiting list is open, the CDC will publicize the availability and nature of housing assistance for very low-income families in a newspaper of general circulation, minority media, and by other suitable means. Notices will also be provided in Spanish and Tagalog.

To reach persons who cannot read the newspapers, the CDC will distribute fact sheets to the broadcasting media, and initiate personal contacts with members of the news media and community service personnel. The CDC will also utilize public service announcements.

The CDC will communicate the status of housing availability to other service providers in the community, advise them of housing eligibility factors and guidelines in order that they can make proper referrals for housing assistance.

I. OWNER OUTREACH [24 CFR 982.54(d)(5), 982.153(b)(1)]

The CDC makes a concerted effort to keep private owners informed of legislative changes in the tenant-based program, which are designed to make the program more attractive to owners. This information includes informing participant owners of applicable legislative changes in program requirements.

The CDC encourages owners of decent, safe and sanitary housing units to lease to Section 8 families.

The CDC encourages participation by owners of suitable units located outside areas of low poverty or minority concentration.

The CDC conducts periodic meetings with participating owners to improve owner relations and to recruit new owners.

The CDC maintains a list of available housing submitted by owners in all neighborhoods within the CDC's jurisdiction to ensure greater mobility and housing choice to very low-income households. The list of owners or units is located on the two bulletin boards on the wall adjacent to the CDC offices and is provided at briefings.

The staff of the CDC initiates personal contact with private property owners and managers by conducting formal and informal discussions and meetings.

Printed material is offered to acquaint owners and managers with the opportunities available under the program.

The CDC has active participation in a community-based organization(s) comprised of private property and apartment owners and managers.

The CDC will actively recruit property owners with property located outside areas of minority and poverty concentration and apply for exception payment standards if the CDC determines it is necessary to make the program more accessible in the CDC's jurisdiction.

The CDC encourages program participation by owners of units located outside areas of poverty or minority concentration. The CDC periodically evaluates the demographic distribution of assisted families to identify areas within the jurisdiction where owner outreach should be targeted. The purpose of these activities is to provide more choice and better housing opportunities to families. Voucher holders are informed of a broad range of areas where they may lease units inside the CDC's jurisdiction and given a list of landlords or other parties who are willing to lease units or help families who desire to live outside areas of poverty or minority concentration.

The CDC works with a nonprofit agency through the regional counseling program who contacts others in the area, identifies families in the program, and counsels the families on their prospective move and services available in the areas in which the family is interested.

The CDC shall periodically:

- Request HUD Field Office to furnish a list of HUD-held properties available for rent.

- Develop working relationship with owners and real estate broker associations. Establish contact with civic, charitable or neighborhood organizations which have an interest in housing for low-income families and public agencies concerned with obtaining housing for displacements.

- Explain the program, including equal opportunity requirements and nondiscrimination requirements, including Fair Housing Amendments Act of 1988 and Americans with Disabilities Act, to real estate agents, landlords, and other groups that have dealings with low-income families or are interested in housing such families.

J. PRIVACY RIGHTS [24 CFR 982.551]

Applicants and participants, including all adults in their households, are required to sign the HUD 9886 Authorization for Release of Information. This document incorporates the Federal Privacy Act Statement and describes the conditions under which HUD/CDC will release family information.

The CDC's policy regarding release of information is in accordance with State and local laws which may restrict the release of family information.

Any and all information, which would lead one to determine the nature and/or severity of a person's disability, must be kept in a separate folder and marked "confidential". The personal information in this folder must not be released except on an "as needed" basis in cases where an accommodation is under consideration. All requests for access and granting of accommodations based on this information must be approved by the Housing Manager.

The CDC's practices and procedures are designed to safeguard the privacy of applicants and program participants. All applicants and participant files will be stored in a secure location, which is only accessible by authorized staff.

CDC staff will not discuss family information contained in files unless there is a business reason to do so. Inappropriate discussion of family information, or improper disclosure of family information by staff will result in disciplinary action.

All files must be signed for when removed from the secured file storage area.

K. EQUAL EMPLOYMENT OPPORTUNITY

The CDC practices affirmative action in hiring, promotion and conditions of employment. Position vacancies are advertised in the San Diego Tribune (daily), National City Star News (biweekly general circulation), Voice, News and Viewpoint (weekly), Black, La Prensa Mexican-American (weekly). In addition, the CDC's recruitment practices will apply aggressive outreach to community-based racial and ethnic groups such as Neighborhood House, MAAC Project, Black Federation of San Diego, Chicano Federation of San Diego, Council of Filipino-American Organizations, Union of Pan-Asian Communities, Chinese Social Services, so that the composition and culture of the staff reflects the composition and culture of the community, to the extent possible. All CDC job postings will display the affirmative action/equal employment opportunity logo and slogan prominently.

L. RULES AND REGULATIONS

This Administrative Plan is set forth to define the CDC's local policies for operation of

the housing programs in the context of Federal laws and Regulations. All issues related to Section 8 not addressed in this document are governed by such Federal regulations, HUD Memos, Notices and guidelines, or other applicable law. The policies in this Administrative Plan have been designed to ensure compliance with the consolidated ACC and all HUD-approved applications for program funding.

M. MONITORING PROGRAM PERFORMANCE

In order to demonstrate compliance with HUD and other pertinent regulations, the CDC will maintain records, reports and other documentation for a time that is in accordance with HUD requirements and in a manner that will allow an auditor, housing professional or other interested party to follow, monitor and/or assess the CDC's operational procedures objectively and with accuracy and in accordance with SEMAP requirements with internal supervisory audits.

In addition to the required SEMAP documentation, supervisory staff audits the following functions:

- Five percent of reexaminations

- Five percent of new applications

- Five percent of the HQS inspections completed by each inspector

- All claims processed

N. TERMINOLOGY

The Community Development Commission of the City of National City is referred to as "CDC" or "Housing Authority" throughout this document.

"Family" is used interchangeably with "Applicant" or "Participant" and can refer to a single person family.

"Tenant" is used to refer to participants in terms of their relation to landlord.

"Landlord" and "owner" are used interchangeably.

"Disability" is used where "handicap" was formerly used.

"Non-citizens Rule" refers to the regulation effective June 19, 1995 restricting assistance to U.S. citizens and eligible immigrants.

The Section 8 programs are also known as the Regular Tenancy Certificate, Over-FMR Tenancy (OFTO) and Voucher Programs. The Housing Choice Voucher program refers to the merged program effective as of 8/12/99.

“HQS” means the Housing Quality Standards required by regulations as enhanced by the PHA.

“Failure to Provide” refers to all requirements in the first Family Obligation. See Chapter 15,

“Denial or Termination of Assistance”.

Merger date refers to October 1, 1999, which is the effective date of the merging of the Section 8 Certificate and Voucher program into the Housing Choice Voucher Program.

See Glossary for other