

Overview of Draft Modifications to Agency Plan Related Documents

Document 1: Santa Cruz County Agency Plan

B.2. New Activities

Project Based Vouchers:

The Housing Authority may elect to project base up to HUD limits 20% budget authority, as allowed by program regulations. Project based units may be located anywhere in the jurisdiction of the Housing Authority. Project basing units is consistent with our PHA plans as it expands the opportunity for low-income, affordable housing throughout our jurisdiction. The Housing Authority projects expanding our current number of 152 units with an additional 113 units with proposed projects (21 at Sycamore Commons & La Playa, 48 at Sunrise, 33 at Water Street, and 11 at Phippen Orchard).

Page 3, B3, Progress Report

Goal: Expand the supply of assisted housing

- The Housing Authority has project based 39 units at St. Stephens Senior Housing in Santa Cruz. The units became available in the summer of 2017. The Housing Authority has conditionally approved project based vouchers for 21 units at Sycamore Commons & La Playa Apartments, and 33 units at Water Street, both in Santa Cruz, 11 at Phippen Orchard and 48 units at Sunrise Apartments in Hollister.

Goal: Increase assisted housing choices

- The Housing Authority has expanded the Landlord Incentive program to all landlords accepting HCV rental assistance. This expansion of the risk-mitigation program is supported by all four cities in the county as well as the county for all unincorporated areas. The Housing Authority has streamlined the process to further encourage landlords to rent to tenants with vouchers.
- The Housing Authority has completed a Fair Market Rent (FMR) study to increase FMRs in an effort to keep pace with rising market rents.

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

- Former foster youth can participate in the Family Self Sufficiency program which can extend the FUP-Youth housing assistance up to five years.

Goal: Improve agency and program management

- This year, the Housing Authority started sending customer satisfaction surveys with the Annual Review (AR) packet in addition to having surveys in the Lobby. We asked two questions that get to the heart of customer service: respectfulness of staff and usefulness of information. *Was the staff person who assisted you courteous and respectful?* 88.3% answered affirmatively. *Did you receive answers, instructions or information you can use?* 90.6% answered affirmatively.

Document 2: Santa Cruz County Housing Choice Voucher Administrative Plan (Text in blue is new)

#	Page	Proposed Wording	Explanation
1	4	<p><u>Number of Waiting Lists</u></p> <p><u>Medicaid Waiver</u> The Housing Authority has adopted a waiting list for applicants who are eligible for a Medicaid Waiver and are referred by agencies with an active memorandum of understanding (MOU) with the Housing Authority.</p>	<p>Recognize the Medicaid Waiver as a Waiting List that should be listed under Number of Waiting Lists</p>
2	5	<p><u>Waiting List Preferences for Designated Groups on the Housing Choice Voucher Waiting List</u></p> <p>Waiting list preferences are described below. All preferences are verified. These preferences will not have the purpose or effect of delaying or otherwise denying admission to the program based on the race, color, ethnic origin, gender, gender identity, sexual orientation religion, disability, or age of any member of an applicant family. Unless otherwise stated, waiting list preferences apply to the Santa Cruz County Housing Choice Voucher Waiting List. All preferences adopted by the Housing Authority are based on local housing needs and priorities as determined by the Housing Authority. With the exception of these waiting list preferences, all other applicants on the Housing Choice Voucher waiting lists will be assisted by date of placement on the waiting list.</p> <p><u>Live/Work Residency Preference</u> The Housing Authority has established a partial Live/Work residency preference, such that 75% of the families selected from the waiting list will either currently live or work in the jurisdiction of the Waiting List and 25% of families selected from the waiting list will neither live nor work in the jurisdiction. The residency preference is applicable to the Santa Cruz County Housing Choice Voucher Waiting List (for households with a Head of Household, spouse or registered domestic partner that lives/works in Santa Cruz County) and the Hollister/San Juan Bautista Housing Choice Voucher Waiting List (for households with a Head of Household, spouse or registered domestic partner that lives/works in San Benito County.) The Residency Preference ensures that the majority of the Housing Choice Vouchers, which have been awarded to the Housing Authority by HUD to serve our jurisdiction, will be made available to those who live or work in the jurisdiction.</p>	<p>Residency preference added</p>

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3	6	<p>Vulnerable Homeless Persons in San Benito County The Housing Authority is working with San Benito County to develop a limited waiting list preference for persons who are experiencing homelessness or at risk of homelessness and have other vulnerability factors. This preference may be implemented following the establishment of a formal agreement with San Benito County and/or a lead service agency identified by San Benito County. The preference will be limited to 24 households, with a maximum of 2 new households per month.</p>	<p>Limited preference for vulnerable homeless in San Benito County added.</p>
4	7	<p><u>Limited Waiting List Preferences for Designated Groups on the Housing Choice Voucher Waiting List</u></p> <p>Graduates of the Shelter Plus Care (S+C) Permanent Supportive Housing Program The Housing Authority has been awarded competitive grants for permanent supportive housing for people experiencing chronic homeless. A program known as Shelter Plus Care is a partnership between the Housing Authority and the County Health Services Agency to provide wrap-around services from outreach and eligibility to housing stabilizing services.</p> <p>S+C recipients who have been stably housed for 2 years may “graduate” into the regular voucher program if they are in good standing with the program and there are vouchers/funding available. At that time, the S+C assistance would be available for the next eligible family referred to the Housing Authority by the Health Services Agency.</p>	<p>Creates opportunity to maximize utilization and make S+C assistance available to new applicants.</p>
5	7	<p>Temporary Measures during Periods of Low Utilization Rate</p> <p>During times of low voucher or funding utilization (under 97%), the Housing Authority may utilize the following measures:</p> <ol style="list-style-type: none"> 1. Lease In-Place Option. This preference will only be applicable to applicants who currently live/work in the Housing Authority jurisdiction, reside in a unit that meets HQS standards, with a landlord who is willing to accept a voucher. 2. The Housing Authority may accept direct referrals from the Community Action Board of Santa Cruz County (CAB) of families at imminent risk of homelessness due to eviction for economic reasons. <p>*The Eviction Prevention preference will be limited to applicants on the HCV waiting list, and the preference will be limited to 24 vouchers.</p>	<p>Creates opportunity to maximize utilization, while providing assistance quickly to those who can benefit from it right away, and helping to keep families housed that are at risk of homelessness.</p>

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6	8	<p><u>Changes to Head of Household or Family Members While on the Waiting List</u></p> <p>If the head of household engages in criminal activity directly related to domestic violence, dating violence, sexual assault or stalking (known as Violence Against Women Act crimes – VAWA) against a household member or affiliated individual, another member of the household can become the head of household if they provide verification of VAWA. When a family break-up results from the occurrence of domestic violence, the PHA must ensure that the victim retains assistance. (See 24 CFR 982.315(a).)</p>	<p>24 CFR 982.315(a). Notice PIH 2017-08 Violence Against Women Reauthorization Act of 2013 Guidance</p>
7	15	<p><u>Definition of a Family</u></p> <p>Each family contains a head of household, who must be at least eighteen years old, or if under 18, they must be an emancipated minor.</p>	<p>FUP Youth referrals include former foster youth, which makes serving emancipated minors a possibility.</p>
8	17	<p><u>Standards for Denying Admission or Terminating Assistance</u></p> <p>The Housing Authority will ensure an otherwise qualified applicant will not be denied admission or have assistance terminated solely on the basis that the applicant/participant has been a victim of domestic violence, dating violence, sexual assault or stalking (VAWA crimes). The Housing Authority has policies and procedure that will ensure notification of applicants and participants of their VAWA rights and responsibilities.</p>	<p>Notice PIH 2017-08 Violence Against Women Reauthorization Act of 2013 Guidance</p>
9	18	<p><u>Assistance to be given to Housing Choice Voucher holders in the exercise of their rights under Federal, State and/or Local Law:</u></p> <p>Program participants speaking languages other than English and Spanish will be accommodated on a case by case basis as needed. The Housing Authority staff are familiar with the policies and procedures in the written Language Assistance Plan for serving Limited English Proficiency individuals.</p>	<p>USDA 7.17.16 Letter: Compliance with Limited English Proficiency (LEP) Requirements</p>
10	22	<p><u>Persons who may NOT receive the voucher</u></p> <p>Cases where the family has been on the program for less than three years will be forwarded to the Director of Eligibility and Occupancy for review on a case by case basis.</p>	<p>Internal discretionary procedure.</p>

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11	31	<p><u>Small Area Fair Market Rents for Project Based Voucher Programs</u> The Housing Authority may use Small Area Fair Market Rents in Project Based Voucher programs.</p>	24 CFR 982.54
12	32	<p><u>Project Based Voucher Selection Procedure</u></p> <p>The Project Based Voucher Program (PBV) allows housing authorities that already administer a tenant based voucher program to use up to a limited number twenty percent 20% of its voucher program budget authority authorized units and attach funding to specific units rather than using it for tenant based assistance.</p>	Notice PIH 2017-21 Implementation Guidance: Housing Opportunity Through Modernization Act of 2016 (HOTMA) — Housing Choice Voucher (HCV) and Project-Based Voucher (PBV) Provisions
13	33	<p><u>Limitation on Number of Project Based Vouchers Per Complex</u></p> <p>No more than 25% of units The Housing Authority follows HUDs limits of the number and percentage of units at any given complex in a project that can be designated as project based units, unless those units are designated as excepted units per 24 CFR 983.56. Excepted units are those units that are either specifically made available for elderly and/or disabled families or families receiving eligible for supportive services.</p>	Notice PIH 2017-21 Implementation Guidance: Housing Opportunity Through Modernization Act of 2016 (HOTMA) — Housing Choice Voucher (HCV) and Project-Based Voucher (PBV) Provisions
14	34	<p><u>Types of supportive services offered in PBV exception units may include the following:</u> Supportive services available to assist families in the project based voucher program may include education, employment, health-related, transportation, personal assistance, housekeeping, money management, and other services designed to help the eligible family live in the community as independently as possible. These services will be continuously available to residents in the project based voucher program. Services will be tailored to assist each family with their identified needs for support to maintain stable housing in the project based voucher program.</p>	Notice PIH 2017-21 Implementation Guidance: Housing Opportunity Through Modernization Act of 2016 (HOTMA) — Housing Choice Voucher (HCV) and Project-Based Voucher (PBV) Provisions
15	35	<p><u>Changes to Household Composition</u> The following individuals may be added to the household and may increase the family’s voucher size:</p> <p>The minor birth child of any existing household member</p>	Internal change to better serve families.

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16	37	<p><u>Approval by the Board of Commissioners or Other Authorized Officials to Charge the Administration Fee</u></p> <p>Approval by the Board of Commissioners is required for all expenditures from the Accumulated Administrative Fee Reserves. Expenditures may be approved in advance as part of the annual budget process when the expenditure is approved as an expected offset to a projected budget deficit.</p>	<p>Unnecessary language. Plan already states that expenditures from the Administrative Fee Reserve account will be made in accordance with all applicable federal requirements and in accordance with the Procurement Policy.</p>
17	37 - 38	<p>XXIII. Voucher Suspension Policy</p> <p>If funding is still insufficient, the Housing Authority will freeze voucher transfer requests of participants.</p> <p>Participants who have a voucher and requested a transfer.(#3 above)</p>	<p>Notice PIH 2016-09 Housing Choice Voucher (HCV) Family Moves with Continued Assistance, Family Briefing, and Voucher Term’s Suspension.</p>

Document 3: Santa Cruz County Public Housing Admissions and Continued Occupancy Plan (ACOP)

#	Page	Proposed Wording	Explanation
1	7	<p><u>Changes to Head of Household or Family Members While on the Waiting List</u></p> <p>If the head of household engages in criminal activity directly related to domestic violence, dating violence, sexual assault or stalking (known as Violence Against Women Act crimes – VAWA) against a household member or affiliated individual, another member of the household can become the head of household if they provide verification of VAWA. When a family break-up results from the occurrence of domestic violence, the PHA must ensure that the victim retains assistance. (See 24 CFR 982.315(a).)</p>	<p>24 CFR 982.315(a) Notice PIH 2017-08 Violence Against Women Reauthorization Act of 2013 Guidance</p>
2	7	<p><u>Changes to Head of Household or Family Members While on the Waiting List</u></p> <p>If the Household wishes to add any new members, the household must request advance permission in writing. The Housing Authority may consider additions to the household on a case by case basis. Individuals who may be added: The spouse, registered domestic partner, or significant other of the head of household; the parent of the head of household; the parent of the head of household’s spouse, registered domestic partner; the child of the head of household or the child of the head of household’s spouse, registered domestic partner; or the minor birth child or any existing household member other than the head of</p>	<p>Increases consistency between plans.</p>

		household or the spouse, registered domestic partner of the head of household.	
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Document 3: Santa Cruz County Public Housing Admissions and Continued Occupancy Plan (ACOP)

3	10	<p><u>Written Third-Party Verification (Tenant Documents):</u></p> <p>For Social Security Benefits, if the EIV information matches the tenant provided information, additional third party verification is not needed.</p>	PIH Notice 2017-12 Administrative Guidance for Effective and Mandated Use of EIV
4	11	<p><u>UNIT TRANSFERS</u></p> <p>Finally, the Housing Authority will give priority to transferring families who are victims of domestic violence, dating violence, sexual assault or stalking (known as Violence Against Women Act, or VAWA crimes) that have requested an Emergency Transfer.</p> <p>The Housing Authority reserves the right to deny or postpone a transfer for tenants who are not in good standing, with the exception of VAWA victim families.</p>	Notice PIH 2017-08 Violence Against Women Reauthorization Act of 2013 Guidance
5	11	<p>Income Targeting</p> <p>Additionally, to achieve a broad range of incomes within the LIPH program, the Housing Authority will strive to achieve the following income range goal for new admissions:</p> <ul style="list-style-type: none"> ▪ 40% of placements — less than 30% of median income ▪ 30% of placements — between 30+% and 50% of median income ▪ 30% of placements — between 50+% and 80% of median income <p>Prior to admission to any one site, attention will be paid to the existing tenant income range and placements will be made with the intent to achieve/maintain a broad range of income at each site. Provided the statutory requirement is met that at least 40% of newly admitted families are at or below 30% of median income, the Housing Authority may select income targeted families on the LIPH waiting list to achieve the income range placement goal.</p>	Unnecessary language. Income targeting not required by HUD.

Document 3: Santa Cruz County Public Housing Admissions and Continued Occupancy Plan (ACOP)

6	13	<p><u>Interim Redetermination of Family Income and Composition</u></p> <p>When the Housing Authority receives information concerning a change in the family’s income or household composition between regularly scheduled reexaminations, the Housing Authority will consult with the family and make any adjustments determined to be appropriate. Any change in the family income or household composition that results in an adjustment in the tenant rent must be verified.</p> <p><u>Changes to Household Composition</u></p> <p>If any household member moves out of the assisted unit, the household must inform the Housing Authority in writing within 14 calendar days of the move out. If the household wishes to add any new members (including temporary family members), the household must request advance permission in writing before any new members move into the unit. All new household members (including temporary household members) will be subject to all Housing Authority eligibility and screening criteria.</p> <p>When a family member is added, staff must first redetermine if the family would be overcrowded, or if the family is in a right-sized unit.</p> <p><u>Changes in Household Income:</u></p> <p>Families must notify the Housing Authority in writing within 14 days of a decrease in income. Decreases in Tenant rent are to be made effective the first of the month following that in which the change was reported. However, no decrease adjustment in tenant rent is to be processed until all facts have been verified.</p> <p>Families must notify the Housing Authority in writing within 14 days of an increase in income, and the Housing Authority may conduct an interim redetermination. This interim redetermination may serve as the family’s next annual reexamination. The sole exception to this is annual increases to fixed income sources like Social Security, which will be verified and processed at the next regular annual reexamination.</p>	Adds consistency with Administrative Plan
7	21	<p><u>NONSMOKING POLICY</u></p> <p>The nonsmoking policy extends to all outdoor areas up to 25 feet from the housing.</p>	PIH Notice 2017-03 HUD Guidance on Institution and Enforcing Smoke-Free Public Housing Policies

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