

<b>PHA 5-Year and Annual Plan</b>	<b>U.S. Department of Housing and Urban Development Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226 Expires 4/30/2011</b>
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<b>1.0</b>	<b>PHA Information</b> PHA Name: Vermont State Housing Authority PHA Code: VT901 PHA Type: <input type="checkbox"/> Small <input checked="" type="checkbox"/> High Performing <input type="checkbox"/> Standard <input checked="" type="checkbox"/> HCV (Section 8) PHA Fiscal Year Beginning: (MM/YYYY): 10/01/2016				
<b>2.0</b>	<b>Inventory</b> (based on ACC units at time of FY beginning in 1.0 above) Number of PH units: 0 Number of HCV units: 3979				
<b>3.0</b>	<b>Submission Type</b> <input type="checkbox"/> 5-Year and Annual Plan <input checked="" type="checkbox"/> Annual Plan Only <input type="checkbox"/> 5-Year Plan Only				
<b>4.0</b>	<b>PHA Consortia</b> <input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below.)				
	Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program
	PHA 1:				PH HCV
	PHA 2:				
	PHA 3:				
<b>5.0</b>	<b>5-Year Plan.</b> Complete items 5.1 and 5.2 only at 5-Year Plan update.				
<b>5.1</b>	<b>Mission.</b> State the PHA's Mission for serving the needs of low-income, very low-income, and extremely low income families in the PHA's jurisdiction for the next five years:  <b>"The Vermont State Housing Authority's (VSHA) core Mission is to promote and expand the supply of affordable rental and home-ownership opportunities on a statewide basis. Each new endeavor will enhance or increase the organization's capacity to continue its core Mission and to assure the effectiveness of VSHA as a provider and administrator of affordable housing programs."</b>				
<b>5.2</b>	<b>Goals and Objectives.</b> Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.  <b>Goals and Objectives for 2015 - 2019:</b>  <b>Goal 1. Continue to administer the Housing Choice Voucher Program, and related programs (Section 8 Moderate Rehabilitation, Section 8 PBV, Shelter plus Care, HOPWA, Department of Mental Health's Subsidy Plus Care program) to meet the needs of very low and extremely low income Vermonters.</b>  Objective: 1. Apply for any new vouchers and funding (federal and state) that may be available .  <b>Goal 2. Increase the supply and availability of decent, safe, and affordable housing – including expanding the supply of assisted housing AND improving the quality of assisted housing.</b>  Objectives: 1. Apply for any new vouchers and funding (federal and state). 2. Utilizing the project-based voucher option, create (leverage) additional units of affordable housing. 3. Actively participate in the State's discussions regarding housing and habitability and the development of a statewide minimum housing code/enforcement.  <b>Goal 3. Promote economic independence and self-sufficiency of families and individuals.</b>  Objectives: 1. Increase enrollments in VSHA's Family Self-Sufficiency program 2. Increase enrollments in VSHA's Section 8 for Homeownership program  <b>Goal 3. Ensure equal opportunity and affirmatively further fair housing.</b>  Objectives: 1. The VSHA will not, on account of race, color, creed or religion, national origin, sex, sexual orientation, gender identity, ancestry or place of birth, age, U.S. Military Veteran status, familial status, marital status, disability, or HIV status deny to any person the opportunity to apply for admission, nor deny to an eligible applicant, the opportunity to lease or rent a dwelling unit suitable to its needs. Further, in the selection of tenants, there will be no discrimination against persons otherwise eligible for admission because their income is derived whole or in part from public				

assistance. VSHA will not discriminate against selected tenants and discrimination by one tenant against another is unacceptable and will not be condoned.

2. Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex familial status, and disability.

3. Serve on the state of Vermont's Fair Housing Committee, a committee of the Vermont Housing Council. The Fair Housing Committee is comprised of representatives from numerous housing agencies, the Vermont Department of Housing and Community Affairs and the Human Rights Commission and work collaboratively on fair housing initiatives and assist in identifying impediments to fair housing choice.

4. Work with the HRC to promote Vermont's law prohibiting discrimination on the basis of receipt of public assistance, including housing assistance.

5. Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of housing choice or unit size required.

**Goal 4. Continue Collaborative work with the Vermont Agency of Human Services around the administration of the Family Unification program, the Mainstream Housing Program, Shelter plus Care Program, AHS' HPRP Program and DMH's Subsidy Plus Care Program.**

draft

## PHA Plan Update

(a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission:

1. Eligibility, Selection and Admissions Policies, including waiting list procedures: Amendments made to Chapter 3, Eligibility, to establish a clear look-back period on debts owed for purposes of denial of assistance. Amendment made to Chapter 4, Local Preferences, creating a preference for homeless families with case management support.

## 2. Financial Resources:

### Vermont State Housing Authority Schedule of Resources Fiscal Year 2015

#### Federal:

Section 8 Tenant-Based Assistance Programs:	\$23,821,317
Resident Opportunity and Self-Sufficiency Grants:	232,033
Supportive Housing Program :	723,696
Shelter Plus Care Program:	1,112,438
Section 8 Project- Based Assistance Programs:	25,474,379
Property Management Fees :	993,055
Property Rental/Tenant Income :	151,931
Development Fees:	4,304
Vermont Housing Finance Agency Fees	14,364
Miscellaneous Income	1,246,786
Interest Income	20,759
Total Sources	\$53,795,062

3. Rent Determination. No Changes. Policies outlined in Administrative Plan.

4. Operation and Management. NA

5. Grievance Procedures: No Changes. Policies outlined in Administrative Plan.

6. n/a

7. Community Service and Self Sufficiency: Community Service and Self Sufficiency: VSHA administers a Family Self-Sufficiency Program, with 157 families currently enrolled. 64% of these families (102 households) have escrow accounts.

8. na

9. na

10. Civil rights certifications. Vermont State Housing Authority exams its programs and proposed programs to identify any impediments to fair housing choice. We address any impediments and work to implement the State's initiatives to affirmatively further fair housing. Further, VSHA is a member of the Fair Housing Committee, a committee of the Vermont Housing Council. The Fair Housing Committee is comprised of representatives from numerous housing agencies, the Vermont Department of Housing and Community Affairs and the Human Rights Commission and work collaboratively on fair housing initiatives and assists in identifying impediments to fair housing choice.

11. Fiscal year audit: No findings

12. na

13. VAWA: Vermont State Housing Authority (VSHA) is committed to fully implementing the provisions of the Violence Against Women's Act signed into law on 1/5/2006. VSHA's commitment is demonstrated, in part, by a Resolution of the VSHA Board of Commissioners, dated July 2006. VSHA has implemented the use of revised forms: HUD HAP Contract (Form HUD 52641), and Tenancy Addendum (Form HUD52641A) when leasing Section 8 HCV families. Further, VSHA works closely with Vermont Legal Aid and the Vermont Network (a statewide organization that works with victims of domestic violence). Both organizations provide comments, and as a result directly influence, VSHA's Five Year/Annual Plan and Section 8 Administrative Plan.

(b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions.

The PHA Plans and attachments are available for public inspection on VSHA's website at [www.vsha.org](http://www.vsha.org) or at our Main administrative office located at One Prospect Street, Montpelier, Vermont.

7.0		<p><b>Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers.</b> <i>Include statements related to these programs as applicable.</i></p> <p>VSHA operates a Section 8 Homeownership program -- we are currently assisting 71 household with mortgage assistance</p> <p>VSHA continues to administer a Project-Based Voucher (PBV) program, with a total of 669 units under HAP contract with for-profit and non-profit owners throughout the State. VSHA will continue to project base vouchers, subject to funding availability, until we have met the maximum authorized level as set forth by HUD.</p>																																																									
8.0	NA	<p><b>Capital Improvements.</b> Please complete Parts 8.1 through 8.3, as applicable.</p>																																																									
8.1	NA	<p><b>Capital Fund Program Annual Statement/Performance and Evaluation Report.</b> As part of the PHA 5-Year and Annual Plan, annually complete and submit the <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i>, form HUD-50075.1, for each current and open CFP grant and CFFP financing.</p>																																																									
8.2	NA	<p><b>Capital Fund Program Five-Year Action Plan.</b> As part of the submission of the Annual Plan, PHAs must complete and submit the <i>Capital Fund Program Five-Year Action Plan</i>, form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan.</p>																																																									
8.3	NA	<p><b>Capital Fund Financing Program (CFFP).</b>  <input type="checkbox"/> Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements.</p>																																																									
9.0		<p><b>Housing Needs.</b> Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.</p> <p><b>1. Statement of Housing Needs</b> [24 CFR Part 903.12 (b), 903.7(a)]          The housing needs of low income individuals and families throughout Vermont are greater than ever. VSHA opened the waiting list for HCV assistance on April 1, 2015 and will close the waiting list on June 15, 2015. households.</p> <p><b>A. Housing Needs of Families on the Section 8 Tenant- Based Assistance Waiting List</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th colspan="4">Housing Needs of Families on the PHA's Waiting List – statistics report dated 6/8/2015</th></tr> <tr> <td colspan="4">Waiting list type: Section 8 tenant-based assistance</td></tr> <tr> <td></td><td># of families</td><td>% of total families</td><td>Annual Turnover</td></tr> <tr> <td>Waiting list total</td><td>1388</td><td></td><td>360 - 600</td></tr> <tr> <td>Extremely low income &lt;=30% AMI</td><td>1063</td><td>76.59%</td><td></td></tr> <tr> <td>Very low income (&gt;30% but &lt;=50% AMI)</td><td>204</td><td>14.70%</td><td></td></tr> <tr> <td>Low income (&gt;50% but &lt;80% AMI)</td><td>27</td><td>1.95%</td><td></td></tr> <tr> <td>Families with children</td><td>563</td><td>40.56%</td><td></td></tr> <tr> <td>Elderly families</td><td>164</td><td>11.82%</td><td></td></tr> <tr> <td>Families with Disabilities</td><td>234</td><td>16.86%</td><td></td></tr> <tr> <td>Race/ethnicity - white</td><td>1271</td><td>91.57%</td><td></td></tr> <tr> <td>Race/ethnicity – American Indian/Alaska Native</td><td>26</td><td>1.87%</td><td></td></tr> <tr> <td>Race/ethnicity – Asian</td><td>6</td><td>0.43%</td><td></td></tr> <tr> <td>Race/African American</td><td>52</td><td>3.75%</td><td></td></tr> </table> <p>Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes</p> <p>If yes:          How long has it been closed? <b>Waiting list will close June 15, 2015.</b>          Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Open for applicants applying for the Disaster and Transitional Housing Preference, the Family Unification Program, Veterans Supportive Housing Program, HOPWA, and Continuum of Care Homeless Programs.</p>	Housing Needs of Families on the PHA's Waiting List – statistics report dated 6/8/2015				Waiting list type: Section 8 tenant-based assistance					# of families	% of total families	Annual Turnover	Waiting list total	1388		360 - 600	Extremely low income <=30% AMI	1063	76.59%		Very low income (>30% but <=50% AMI)	204	14.70%		Low income (>50% but <80% AMI)	27	1.95%		Families with children	563	40.56%		Elderly families	164	11.82%		Families with Disabilities	234	16.86%		Race/ethnicity - white	1271	91.57%		Race/ethnicity – American Indian/Alaska Native	26	1.87%		Race/ethnicity – Asian	6	0.43%		Race/African American	52	3.75%		
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	<p><b>B. Housing Needs of Families Based on State Of Vermont HUD Consolidated Plan. Draft 2010-2015 Consolidated Plan is attached as Appendix A.</b></p> <p>VSHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan:</p> <ul style="list-style-type: none"> <li>• VSHA participated in the consultation process organized by the Vermont Department of Housing and Community Affairs in the development of the Consolidated Plan;</li> <li>• Activities to be undertaken by VSHA in the coming years are consistent with the initiatives contained in the Consolidated Plan.</li> </ul> <p><b>C. Housing Needs of Families Served Based on HUD's <i>Resident Characteristics Report</i> for Section 8 and Public Housing Programs for Vermont – as of May 2015:</b></p> <p><b>Distribution of Family Type (participating families):</b></p> <table border="1"> <tr> <td>Elderly no children, non-disabled:</td><td>5%</td></tr> <tr> <td>Non-elderly no children, non-disabled:</td><td>5%</td></tr> <tr> <td>Non-elderly with children non-disabled:</td><td>24%</td></tr> <tr> <td>Elderly, no children, disabled:</td><td>17%</td></tr> <tr> <td>Non-elderly, no children, disabled:</td><td>37%</td></tr> <tr> <td>Non-elderly with children, disabled:</td><td>10%</td></tr> <tr> <td>Female Headed Household with children:</td><td>32%</td></tr> </table>	Elderly no children, non-disabled:	5%	Non-elderly no children, non-disabled:	5%	Non-elderly with children non-disabled:	24%	Elderly, no children, disabled:	17%	Non-elderly, no children, disabled:	37%	Non-elderly with children, disabled:	10%	Female Headed Household with children:	32%
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<p><b>9.1</b></p>	<p><b>Strategy for Addressing Housing Needs.</b> Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. <b>Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan.</b></p> <p>VSHA will apply for any new sources of funding that allow us to expand our rental assistance options -- this includes housing choice vouchers, McKinney Vento homeless funds and section 8 contract administration opportunities. Further, we will continue to collaborate with the Agency of Human Services and the Veterans Administration in the application and administration of our housing programs. VSHA will fully utilize all sources of funding currently available to assist the maximum number of individuals/households possible.</p> <p>To increase the supply of good quality, affordable rental housing, we have increased the Authority's PBV portfolio, with plans to increase the supply of PBV funded units during 2016.</p> <p>Consistent with the goals established by the United States Interagency Council on Homelessness to prevent and end homelessness for families, youth and children by 2020, VSHA is creating a selection preference for homeless families with case management support.</p> <p><b>Additional Information.</b> Describe the following, as well as any additional information HUD has requested.</p> <p>(a) <b>Progress in Meeting Mission and Goals.</b> Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan.</p> <ul style="list-style-type: none"> <li>✓ Applied for and received 28 additional HUD-VASH vouchers that will assist additional homeless veterans.</li> <li>✓ Expanded its PBV program by 59 units, increasing the supply and availability of decent, safe and affordable housing for extremely low and very low income Vermonters.</li> <li>✓ Gradated 9 individuals from our Family Self-Sufficiency Program.</li> <li>✓ Enrolled 31 individuals into our Family Self-Sufficiency Program.</li> <li>✓ Closed on 4 homes through the Section 8 for Homeownership Program.</li> </ul> <p>(b) <b>Significant Amendment and Substantial Deviation/Modification.</b> Provide the PHA's definition of "significant amendment" and "substantial deviation/modification"</p> <p>Any of the following actions will be considered a "significant amendment or modification" to VSHA's Five-Year or Annual Plan:</p> <ol style="list-style-type: none"> <li>1. Changes in tenant-rent policies;</li> <li>2. Changes to admissions policies – including the creation or elimination of any preference– and waiting list organization;</li> <li>3. Additions of new activities and programs as well as the omission of any existing activity or program.</li> </ol>														

11.0	<p><b>Required Submission for HUD Field Office Review.</b> In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. <b>Note:</b> Faxed copies of these documents will not be accepted by the Field Office.</p> <ul style="list-style-type: none"> <li>(a) Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> (which includes all certifications relating to Civil Rights)</li> <li>(b) Form HUD-50070, <i>Certification for a Drug-Free Workplace</i> (PHAs receiving CFP grants only)</li> <li>(c) Form HUD-50071, <i>Certification of Payments to Influence Federal Transactions</i> (PHAs receiving CFP grants only)</li> <li>(d) Form SF-LLL, <i>Disclosure of Lobbying Activities</i> (PHAs receiving CFP grants only)</li> <li>(e) Form SF-LLL-A, <i>Disclosure of Lobbying Activities Continuation Sheet</i> (PHAs receiving CFP grants only)</li> <li>(f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations.</li> </ul> <p>A meeting of the Section 8 Resident Advisory Board (RAB) was held on Thursday, June 19<sup>th</sup>, 2014 at 10:00 a.m. There were no objections/comments provided.</p> <ul style="list-style-type: none"> <li>(g) Challenged Elements</li> <li>(h) Form HUD-50075.1, <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> (PHAs receiving CFP grants only)</li> <li>(i) Form HUD-50075.2, <i>Capital Fund Program Five-Year Action Plan</i> (PHAs receiving CFP grants only)</li> </ul>
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This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced 5-Year and Annual PHA Plans. The 5-Year and Annual PHA plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission and strategies for serving the needs of low-income and very low-income families. This form is to be used by all PHA types for submission of the 5-Year and Annual Plans to HUD. Public reporting burden for this information collection is estimated to average 12.68 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

## **Instructions form HUD-50075**

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

### **1.0 PHA Information**

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

### **2.0 Inventory**

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

### **3.0 Submission Type**

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

### **4.0 PHA Consortia**

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

### **5.0 Five-Year Plan**

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

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

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

**6.0 PHA Plan Update.** In addition to the items captured in the Plan template, PHAs must have the elements listed below readily available to the public. Additionally, a PHA must:

- (a) Identify specifically which plan elements have been revised since the PHA's prior plan submission.
- (b) Identify where the 5-Year and Annual Plan may be obtained by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on its official website. PHAs are also encouraged to provide each resident council a copy of its 5-Year and Annual Plan.

#### **PHA Plan Elements. (24 CFR 903.7)**

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

2. **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA Operating, Capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources.

3. **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units.

4. **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA.

5. **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants.

6. **Designated Housing for Elderly and Disabled Families.** With respect to public housing projects owned, assisted, or operated by the PHA, describe any projects (or portions thereof), in the upcoming fiscal year, that the PHA has designated or will apply for designation for occupancy by elderly and disabled families. The description shall include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, and; 5) the number of units affected.

7. **Community Service and Self-Sufficiency.** A description of: (1) Any programs relating to services and amenities provided or offered to assisted families; (2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS; (3) How the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. **(Note: applies to only public housing).**

8. **Safety and Crime Prevention.** For public housing only, describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must include: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the



appropriate police precincts for carrying out crime prevention measures and activities.

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

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

- (a) **Hope VI or Mixed Finance Modernization or Development.**  
1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Mixed Finance Modernization or Development; and  
2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI, Mixed Finance Modernization or Development, is a separate process. See guidance on HUD's website at:  
<http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>
- (b) **Demolition and/or Disposition.** With respect to public housing projects owned by the PHA and subject to ACCs under the Act: (1) A description of any housing (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at:  
[http://www.hud.gov/offices/pih/centers/sac/demo\\_dispo/index.cfm](http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm)  
**Note:** This statement must be submitted to the extent that **approved and/or pending** demolition and/or disposition has changed.

- (c) **Conversion of Public Housing.** With respect to public housing owned by a PHA: 1) A description of any building or buildings (including project number and unit count) that the PHA is required to convert to tenant-based assistance or that the public housing agency plans to voluntarily convert; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received under this chapter to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:  
<http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>
- (d) **Homeownership.** A description of any homeownership (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval.
- (e) **Project-based Vouchers.** If the PHA wishes to use the project-based voucher program, a statement of the projected number of project-based units and general locations and how project basing would be consistent with its PHA Plan.

**8.0 Capital Improvements.** This section provides information on a PHA's Capital Fund Program. With respect to public housing projects owned, assisted, or operated by the public housing agency, a plan describing the capital improvements necessary to ensure long-term physical and social viability of the projects must be completed along with the required forms. Items identified in 8.1 through 8.3, must be signed where directed and transmitted electronically along with the PHA's Annual Plan submission.

**8.1 Capital Fund Program Annual Statement/Performance and Evaluation Report.** PHAs must complete the *Capital Fund Program Annual Statement/Performance and Evaluation Report* (form HUD-50075.1), for each Capital Fund Program (CFP) to be undertaken with the current year's CFP funds or with CFFP proceeds. Additionally, the form shall be used for the following purposes:

- (a) To submit the initial budget for a new grant or CFFP;
- (b) To report on the Performance and Evaluation Report progress on any open grants previously funded or CFFP; and
- (c) To record a budget revision on a previously approved open grant or CFFP, e.g., additions or deletions of work items, modification of budgeted amounts that have been undertaken since the submission of the last Annual Plan. The Capital Fund Program Annual Statement/Performance and Evaluation Report must be submitted annually.

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

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

#### 8.2 Capital Fund Program Five-Year Action Plan

PHAs must submit the *Capital Fund Program Five-Year Action Plan* (form HUD-50075.2) for the entire PHA portfolio for the first year of participation in the CFP and annual update thereafter to eliminate the previous year and to add a new fifth year (rolling



basis) so that the form always covers the present five-year period beginning with the current year.

**8.3 Capital Fund Financing Program (CFFP).** Separate, written HUD approval is required if the PHA proposes to pledge any portion of its CFP/RHF funds to repay debt incurred to finance capital improvements. The PHA must identify in its Annual and 5-year capital plans the amount of the annual payments required to service the debt. The PHA must also submit an annual statement detailing the use of the CFFP proceeds. See guidance on HUD's website at:

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

**9.0 Housing Needs.** Provide a statement of the housing needs of families residing in the jurisdiction served by the PHA and the means by which the PHA intends, to the maximum extent practicable, to address those needs. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**

**9.1 Strategy for Addressing Housing Needs.** Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**

**10.0 Additional Information.** Describe the following, as well as any additional information requested by HUD:

- (a) Progress in Meeting Mission and Goals.** PHAs must include (i) a statement of the PHAs progress in meeting the mission and goals described in the 5-Year Plan; (ii) the basic criteria the PHA will use for determining a significant amendment from its 5-year Plan; and a significant amendment or modification to its 5-Year Plan and Annual Plan. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**
- (b) Significant Amendment and Substantial Deviation/Modification.** PHA must provide the definition of "significant amendment" and "substantial deviation/modification". **(Note: Standard and Troubled**

**PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan.)**

- (c)** PHAs must include or reference any applicable memorandum of agreement with HUD or any plan to improve performance. **(Note: Standard and Troubled PHAs complete annually).**

**11.0 Required Submission for HUD Field Office Review.** In order to be a complete package, PHAs must submit items (a) through (g), with signature by mail or electronically with scanned signatures. Items (h) and (i) shall be submitted electronically as an attachment to the PHA Plan.

- (a)** Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*
- (b)** Form HUD-50070, *Certification for a Drug-Free Workplace (PHAs receiving CFP grants only)*
- (c)** Form HUD-50071, *Certification of Payments to Influence Federal Transactions (PHAs receiving CFP grants only)*
- (d)** Form SF-LLL, *Disclosure of Lobbying Activities (PHAs receiving CFP grants only)*
- (e)** Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet (PHAs receiving CFP grants only)*
- (f)** Resident Advisory Board (RAB) comments.
- (g)** Challenged Elements. Include any element(s) of the PHA Plan that is challenged.
- (h)** Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report (Must be attached electronically for PHAs receiving CFP grants only)*. See instructions in 8.1.
- (i)** Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan (Must be attached electronically for PHAs receiving CFP grants only)*. See instructions in 8.2.

## **PART III: DENIAL OF ASSISTANCE**

### **3-III.A. OVERVIEW**

A family that does not meet the eligibility criteria discussed in Parts I and II, must be denied assistance.

In addition, HUD requires or permits the PHA to deny assistance based on certain types of current or past behaviors of family members.

#### **Forms of Denial [24 CFR 982.552(a)(2); HCV GB, p. 5-35]**

Denial of assistance includes any of the following:

- Not placing the family's name on the waiting list
- Denying or withdrawing a voucher
- Not approving a request for tenancy or refusing to enter into a HAP contract
- Refusing to process a request for or to provide assistance under portability procedures

#### **Prohibited Reasons for Denial of Program Assistance [24 CFR 982.202(b), Pub.L. 109-162]**

HUD rules prohibit denial of program assistance to the program based on any of the following criteria:

- Age, disability, race, color, religion, sex, or national origin. (See Chapter 2 for additional information about fair housing and equal opportunity requirements.)
- Where a family lives prior to admission to the program
- Where the family will live with assistance under the program. Although eligibility is not affected by where the family will live, there may be restrictions on the family's ability to move outside the PHA's jurisdiction (See Chapter 10, Portability.)
- Whether members of the family are unwed parents, recipients of public assistance, or children born out of wedlock
- Whether the family includes children
- Whether a family decides to participate in a family self-sufficiency program
- Whether or not a qualified applicant has been a victim of domestic violence, dating violence, or stalking

### **3-III.B. MANDATORY DENIAL OF ASSISTANCE [24 CFR 982.553(a)]**

HUD requires the PHA to deny assistance in the following cases:

- Any member of the household has been evicted from federally-assisted housing in the last 3 years for drug-related criminal activity. HUD permits, but does not require, the PHA to admit an otherwise-eligible family if the household member has completed a PHA-approved drug rehabilitation program or the circumstances which led to eviction no longer exist (e.g., the person involved in the criminal activity no longer lives in the household).

#### PHA Policy

The PHA will admit an otherwise-eligible family who was evicted from federally assisted housing within the **past seven years** for drug-related criminal activity, if the PHA is able to verify that the household member who engaged in the criminal activity has completed a supervised drug rehabilitation program approved by the PHA, or the person who committed the crime, is no longer living in the household.

- The PHA determines that any household member is currently engaged in the use of illegal drugs.

#### PHA Policy

*Currently engaged in* is defined as any use of illegal drugs during the previous six months.

- The PHA has reasonable cause to believe that any household member's current use or pattern of use of illegal drugs, or current abuse or pattern of abuse of alcohol, may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

#### PHA Policy

In determining reasonable cause, the PHA will consider all credible evidence, including but not limited to, any record of convictions, arrests, or evictions of household members related to the use of illegal drugs or the abuse of alcohol. A conviction will be given more weight than an arrest. The PHA will also consider evidence from treatment providers or community-based organizations providing services to household members.

- Any household member has ever been convicted of drug-related criminal activity for the production or manufacture of methamphetamine on the premises of federally assisted housing
- Any household member is subject to a lifetime registration requirement under a state sex offender registration program

### **3-III.C. OTHER PERMITTED REASONS FOR DENIAL OF ASSISTANCE**

HUD permits, but does not require, the PHA to deny assistance for the reasons discussed in this section.

#### **Criminal Activity [24 CFR 982.553]**

HUD permits, but does not require, the PHA to deny assistance if the PHA determines that any household member is currently engaged in, or has engaged in during a reasonable time before the family would receive assistance, certain types of criminal activity.

#### PHA Policy

If any household member is currently engaged in, or has engaged in any of the following criminal activities, **within the past seven years**, the family will be denied assistance.

*Drug-related criminal activity*, defined by HUD as the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug [24 CFR 5.100].

*Violent criminal activity*, defined by HUD as any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage [24 CFR 5.100].

Criminal activity that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity; or

Criminal activity that may threaten the health or safety of property owners and management staff, and persons performing contract administration functions or other responsibilities on behalf of the PHA (including a PHA employee or a PHA contractor, subcontractor, or agent).

*Immediate vicinity* means within a three-block radius of the premises.

Evidence of such criminal activity includes, but is not limited to:

- Any conviction for drug-related or violent criminal activity within the **past seven years**.

- Any arrests for drug-related or violent criminal activity within the **past seven (7) years**.

- Any record of eviction from public or privately-owned housing as a result of criminal activity within the **past seven years**.

- A conviction for drug-related or violent criminal activity will be given more weight than an arrest for such activity.

In making its decision to deny assistance, the PHA will consider the factors discussed in Section 3-III.E. Upon consideration of such factors, the PHA may, on a case-by-case basis, decide not to deny assistance.

### **Previous Behavior in Assisted Housing [24 CFR 982.552(c)]**

HUD authorizes the PHA to deny assistance based on the family's previous behavior in assisted housing:

#### PHA Policy

The PHA **will not** deny assistance to an otherwise eligible family because the family previously failed to meet its obligations under the Family Self-Sufficiency (FSS) program.

The PHA **will** deny assistance to an applicant family if:

The family does not provide information that the PHA or HUD determines is necessary in the administration of the program.

The family does not provide complete and true information to the PHA.

Any family member has been evicted from federally-assisted housing in the last **seven years**.

Any PHA has ever terminated assistance under the program for any member of the family **during the seven years prior to application date**.

Any family member has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program.

The family *currently* owes rent or other amounts <sup>1</sup>to VSHA -- *or any* PHA in connection with the HCV, Certificate, Moderate Rehabilitation or public housing programs, unless the family repays the full amount of the debt prior to being selected from the waiting list.

If the family has not reimbursed any PHA for amounts the PHA paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease, unless the family repays the full amount of the debt prior to being selected from the waiting list. The family has breached the terms of a repayment agreement entered into with the PHA, unless the family repays the full amount of the debt covered in the repayment agreement prior to being selected from the waiting list.

A family member has engaged in or threatened violent or abusive behavior toward PHA personnel.

*Abusive or violent behavior towards PHA personnel* includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.

*Threatening* refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.

In making its decision to deny assistance, the PHA will consider the factors discussed in Section 3-III.E. Upon consideration of such factors, the PHA may, on a case-by-case basis, decide not to deny assistance.

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<sup>1</sup> By definition, an amount that the family “currently owes” is not barred by the statute of limitations. VSHA will not deny assistance for a debt that is barred by the statute of limitations.

## Local Preferences [24 CFR 982.207; HCV p. 4-16]

PHAs are permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

### PHA Policy

**VSHA will offer public notice when changing its preference system. The notice will be publicized using the same guidelines as those followed for amending the agency's PHA plan or opening and closing the waiting list, depending on when the change is planned to occur.**

**VSHA uses the following local preference system:**

**Disaster Preference:** This preference is available to families who are displaced due to fire, flood, natural disaster, or condemnation by a local, State, or Federal Agency.

**Transitional Housing Preference:** This preference is available to individuals and families who are Transitioning from one of the following programs administered by the Vermont State Housing Authority:

- HUD's Family Unification program for Youth In Transition;
- The Vermont Rental Subsidy Program (a rapid rehousing initiative administered by the Vermont Agency of Human Services). State of Vermont's Housing Assistance Subsidy Program (administered by the Vermont Agency of Human Services).
- Individuals/families transitioning from a Domestic Violence Transitional Housing Program (currently on or eligible to be on the Continuum of Care Homeless Inventory Chart for homeless beds).
- \*HUD's McKinney-Vento Shelter Plus Care Program Continuum of Care Programs administered by VSHA (Shelter plus Care and Rapid Rehousing);

**1. ——— Individuals transitioning from VHFA's Section 811 PRA program — up to a maximum of 33 Housing Choice Vouchers. To be considered for this preference, individuals must have been in occupancy for at least twelve consecutive months, be a tenant in good standing and otherwise in compliance with their lease.**

To be considered for this preference, applicants **must** meet the following additional criteria:

1. Actively participating in a case-management plan – which includes an exit discharge plan with an appropriate organization providing these services; ***and***
2. Be in compliance with any lease agreement (verbal or written). Families must be current in their rent and any other conditions of tenancy. Families ~~can not~~ **cannot** be subject to an eviction action. VSHA will require Certification from the applicant's current landlord stating they are *in good standing and in compliance with their lease agreement*.

*\*Applicants transitioning from HUD's/VSHA's Shelter plus Care program MUST provide certification from the (Shelter plus Care) Sponsoring Organization that the applicant has participated in the Shelter plus Care program for no less than 36 months and has met the goals of their ~~Individual Service~~ **case management Pplan.** ~~(ISP).~~*

**Preference for Homeless Families with Case Management Support:**

*Preference will be limited to no more than 100 applicants /fiscal year (10/1 – 9/30).*

Preference will be provided to families (with one or more minor children) who are homeless as defined by HUD's Category 1 definition of homelessness (see definition below) **and** who will be receiving regular on-site case management support from a local homeless services, social services or mental health agency for at least one year after moving into a voucher-assisted unit. Status will be verified through the agency providing case management.



*Category 1: An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: a. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park abandoned building, bus or train station, airport, or camping ground; or b. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or c. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution”.*