

Streamlined Annual PHA Plan (HCV Only PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
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Purpose. 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, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. The Form HUD-50075-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS and SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																																			
A.1	<p>PHA Name: <u>Vermont State Housing Authority</u> PHA Code: <u>VT901</u> PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/01/2023</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Housing Choice Vouchers (HCVs) <u>4378</u> (including 5-Year Mainstream) PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website.</p> <p>Copies of PHA Plan are available at VSHA's main campus located at: One Prospect Street, Montpelier, VT, or via VSHA's website: www.vsha.org, or by contacting Kelli Robinson, Director of Housing Program Administration at (802) 828-3018.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="width: 25%;">Participating PHAs</th> <th style="width: 10%;">PHA Code</th> <th style="width: 25%;">Program(s) in the Consortia</th> <th style="width: 20%;">Program(s) not in the Consortia</th> <th style="width: 20%;">No. of Units in Each Program</th> </tr> </thead> <tbody> <tr> <td>Lead HA:</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	Lead HA:																													
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B.	Plan Elements.
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B.1

Revision of Existing PHA Plan Elements.

a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs.
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources.
- Rent Determination.
- Operation and Management.
- Informal Review and Hearing Procedures.
- Homeownership Programs.
- Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.
- Substantial Deviation.
- Significant Amendment/Modification.

(b) If the PHA answered yes for any element, describe the revisions for each element(s):

Statement of Housing Needs and Strategy for Addressing Housing Needs:

On June 14, 2021, the Governor issued a directive to the Secretary of Commerce and Community Development “lifting State restrictions” relating to the COVID-19 pandemic – setting the stage for the Authority to pivot to COVID-recovery efforts.

During the height of the pandemic the State of Vermont, Agency of Human Services, housed 2,500 families in motels/hotels/temporary living situations.

In collaboration with various State and local community partners we are working collaboratively to ensure families who received time-limited rental assistance during the pandemic remain stability housed.

On July 1, 2021, VSHA adopted a change in our Section 8 Administrative Plan preferences policy. The adoption of this modified policy ensured that the collaborative work undertaken by various partnering agencies supported the successful transition of families to a form of permanent rental assistance.

As of May 26, 2022, 449 households have been stability housed with a form of permanent rental assistance.

**Section 8
Success Summary**

Result	Count	Percentage
Successful	392	92.45%
Unsuccessful	32	7.55%
Total	424	

**Mainstream
Success Summary**

Result	Count	Percentage
Successful	22	88.00%
Unsuccessful	3	12.00%
Total	25	

Total Success Summary (combined)

Result	Count	Percentage
Successful	414	92.20%
Unsuccessful	35	7.80%
Total	449	

VSHA’s waiting list for Section 8 tenant-based rental assistance continues to be closed, except for Section 8 project-based rental assistance and the Authority’s preferences.

Waiting List statistics that follow are consistent with the Vermont Housing Needs Assessment and the Consolidated Plan.

Race			Ethnicity		
Primary Race	Number of Families	Percentage of Families	Ethnicity	Number of Families	Percentage of Families
White	106	25.98%	Hispanic	16	3.92%
Black	5	1.23%	Not Hispanic	392	96.08%
Indian	4	0.98%	Total Families	408	
Asian	1	0.25%			
Hawaiian	0	0.00%			
Other	292	71.57%			
Total Families	408				

Bedroom Size			Family Type		
Bedroom	Number of Families	Percentage of Families	Type	Number of Families	Percentage of Families
0	15	3.68%	Has Children	68	16.67%
1	255	62.50%	Near Elderly Families	30	7.35%
2	86	21.08%	Elderly Families	69	16.91%
3	41	10.05%	Single Occupancy	299	73.28%
4	11	2.70%	Disabled Families	269	65.93%
5+	0	0.00%			
Total Families	408				

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions:

In response to PIH Notice 2021-14, VSHA implemented continued operational flexibilities and regulatory waiver authority. VSHA implemented continued operational flexibilities effective January 20, 2022. VSHA implemented regulatory waiver authority effective February 14, 2022, as HUD approved our request February 2, 2022. These waivers are attached as an addendum to this plan.

On July 13, 2022, the VSHA Board of Commissioners will be asked to consider / approve a change to our preferences policy. They will be asked to consider / approve the following changes:

to adopt a preference to serve families with an Area Median Income (AMI) of 30% or below who are at risk of homelessness or housing instability; and

to modify our existing ‘Move-up’ preference to serve families with incomes above 30% of AMI up to 50% of AMI who meet the criteria of actively receiving rental assistance benefits through a VSHA-administered rental assistance program who is certified to be in compliance with the benefit program & tenancy requirements.

Financial Resources 2022:

	2022	2021
Section 8 Tenant Based Assistance Programs:	\$33,771,109.00	\$33,760,115.00
Resident Opportunity and Self-Sufficiency Grants:	\$296,468.00	\$330,637.00
Continuum of Care:	\$1,794,702.00	\$1,996,174.00
Section 8 Project Based Assistance Programs:	\$31,496,826.00	\$28,331,201.00
Property Management Fees:	\$1,183,959.00	\$1,136,834.00
Property Rental/Tenant Income:	\$1,517,029.00	\$167,963.00
Development Fees:	\$0.00	\$0.00
Miscellaneous Income:	\$2,882,806.00	\$1,497,235.00
Interest Income:	\$50,917.00	\$46,199.00
Total Sources	\$72,993,816.00	\$67,266,358.00

B.2 New Activities. – Not Applicable

B.3 Progress Report.

Provide a description of the PHA’s progress in meeting its Mission and Goals described in its 5-Year PHA Plan.

VSHA continues to make good progress in fulfilling and furthering our mission, “to promote and expand the supply of affordable rental and homeownership opportunities on a statewide basis”.

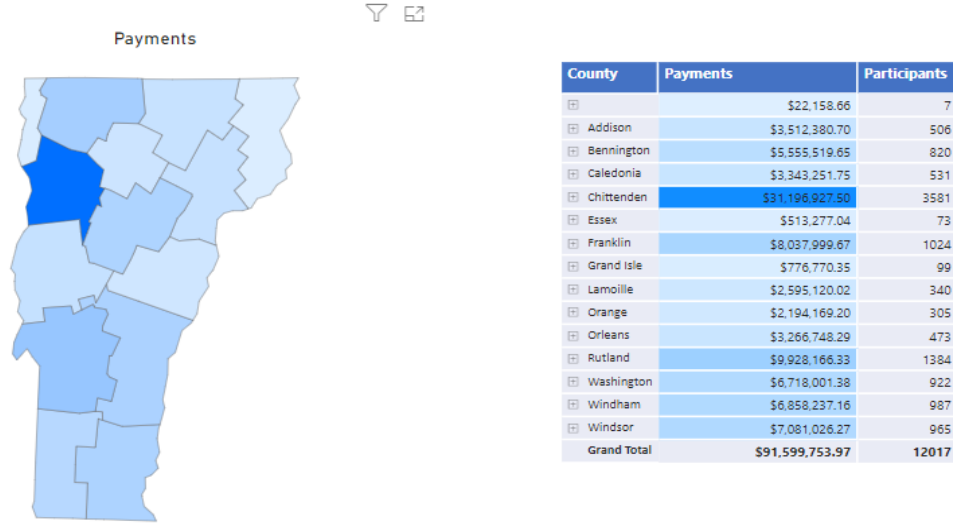
In the Fall of 2020, the VSHA Board of Commissioners and Executive Staff, launched a strategic planning process which included input from staff. The attached document titled, “Strategic Plan to Date” illustrates the Authority’s vision for the future, goals and benchmarks, and progress made to date. This document is attached as an addendum to this plan.

We have been successful in meeting all programmatic requirements to ensure that we continue to administer / operate programs with integrity with the adoption and implementation of operational flexibilities and waiver authority.

On April 5, 2022, VSHA successfully launched the Vermont Emergency Rental Assistance Program (VERAP) under the terms of agreement with the Agency of Administration. After 13 months VERAP continues to grow and change to meet the needs of Vermont families by having provided advance payment to Jenna’s Promise Recovery Residence, provided funding for the transitional housing of 100 Afghan refugees on the School for International Training (SIT) campus in Brattleboro, and issued direct payments to Courts for eviction prevention.

This program has paid out \$91 million to benefit over 12,000 Vermont families. The program continues to reach our most vulnerable families with over 80% of VERAP families at or below 50% of AMI for their county.

**Vermont Emergency Rental Assistance Program (VERAP)
May 26, 2022**



- 12/01/21: Awarded 20 Foster Youth to Independence Vouchers
- 01/24/22: Awarded funding to support Family Self-Sufficiency Coordinators

We continue to expand the Project-Based Voucher (PBV) Program. We awarded 68 PBV’s in 11 projects in 11 different communities in 8 unique counties targeted to serve homeless families. In addition, we have brought on an additional 17 units under an agreement to enter into HAP Contract.

Graduated 10 individuals from Family Self-Sufficiency, disbursing a total of \$54,846.49 in escrow funds.

In partnership with the NeighborWorks Homeownership Centers, supported 1 family in achieving homeownership through VSHA’s Section 8 for Homeownership Program.

We continue to administer state-funded housing grants, including the Department of Mental Health’s Housing plus Care and the Department of Health’s Bridge to HOPWA program.

We continue to perform housing inspections under the terms and conditions of grant agreements with the Agency of Human Services’ Housing Opportunities and Vermont Rental Subsidy programs.

We continue to be designated a “high performer” under HUDs Section 8 Management Assessment Program (SEMAP) for the period ending 9/30/2019, as well as for the past consecutive seven years – designation carried forward to 9/31/22.

B.4 Capital Improvements. – Not Applicable

<p>B.5</p>	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>		
<p>C. Other Document and/or Certification Requirements.</p>			
<p>C.1</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>		
<p>C.2</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>		
<p>C.3</p>	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>		
<p>C.4</p>	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>		
<p>D. Affirmatively Furthering Fair Housing (AFFH).</p>			
<p>D.1</p>	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <table border="1" data-bbox="180 1476 1451 1927"> <tr> <td data-bbox="180 1476 1451 1518"> <p>Fair Housing Goal:</p> </td> </tr> <tr> <td data-bbox="180 1518 1451 1927"> <p><u>Describe fair housing strategies and actions to achieve the goal</u></p> </td> </tr> </table>	<p>Fair Housing Goal:</p>	<p><u>Describe fair housing strategies and actions to achieve the goal</u></p>
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Fair Housing Goal:

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Instructions for Preparation of Form HUD-50075-HCV Annual PHA Plan for HCV-Only PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **Number of Housing Choice Vouchers (HCVs)**, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. ([24 CFR §943.128\(a\)](#))

B. Plan Elements. All PHAs must complete this section. ([24 CFR §903.11\(c\)\(3\)](#))

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.”

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR 5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR § 903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for HCV. (24 CFR §903.7(b))

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA HCV funding and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support 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. (24 CFR §903.7(c))

Rent Determination. A statement of the policies of the PHA governing rental contributions of families receiving tenant-based assistance, discretionary minimum tenant rents, and payment standard policies. (24 CFR §903.7(d))

Operation and Management. A statement that includes a description of PHA management organization, and a listing of the programs administered by the PHA. (24 CFR §903.7(e))

Informal Review and Hearing Procedures. A description of the informal hearing and review procedures that the PHA makes available to its applicants. (24 CFR §903.7(f))

Homeownership Programs. A statement describing any homeownership programs (including project number and unit count) administered by the agency under section 8y of the 1937 Act, or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements. A description of any PHA programs relating to services and amenities coordinated, promoted, or provided by the PHA for assisted families, including those resulting from the PHA's partnership with other entities, for the enhancement of the economic and social self-sufficiency of assisted families, including programs provided or offered as a result of the PHA's partnerships with other entities, and activities subject to Section 3 of the Housing and Community Development Act of 1968 (24 CFR Part 135) and under requirements for the Family Self-Sufficiency Program and others. Include the program's size (including required and actual size of the FSS program) and means of allocating assistance to households. (24 CFR §903.7(l)(i)) Describe how the PHA will comply with the requirements of section 12(c) and (d) of the 1937 Act that relate to treatment of income changes resulting from welfare program requirements. (24 CFR §903.7(l)(iii)).

Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan.

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

B.2 New Activities. This section refers to new capital activities which is not applicable for HCV-Only PHAs.

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.11(c)(3), 24 CFR §903.7(r)(1))

B.4 Capital Improvements. This section refers to PHAs that receive funding from the Capital Fund Program (CFP) which is not applicable for HCV-Only PHAs

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

C. Other Document and/or Certification Requirements.

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

C.2 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with

any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. 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. (24 CFR §903.7(o)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) ... Strategies and actions must affirmatively further fair housing ...". Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

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 the Annual PHA Plan. The Annual PHA Plan provides 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 for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 6.02 hour 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



OFFICE OF PUBLIC AND INDIAN HOUSING

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

February 2, 2022

Ms. Kelli Robinson
Director, Housing Program Administration
Vermont State Housing Authority
One Prospect Street, Suite 1
Montpelier, VT 05602

Dear Ms. Robinson:

The Department of Housing and Urban Development (HUD) reviewed the Vermont State Housing Authority (VSHA) request submitted pursuant to **Notice PIH 2021-34, "Expedited Regulatory Waivers for the Public Housing and Housing Choice Voucher (including Mainstream and Mod Rehab) Programs."** The Notice provided instructions on the expedited processing of public housing authority (PHA) requests to continue to use specific regulatory waivers for the Public Housing and Housing Choice Voucher (HCV) (including Mainstream and Mod Rehab) programs impacted by the COVID-19 pandemic. The waivers you requested are marked "Yes" in column one on the table below.

Background:

The Coronavirus Aid, Relief, and Economic Security (CARES) Act (Public Law 116-136) provided HUD with authority, in the context of the public health emergency, to waive statutes and regulations (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment) for the HCV and Public Housing programs. Most CARES Act waivers and alternative requirements contained in notice PIH 2021-14 (published May 5, 2021) expire on December 31, 2021; specific previously exercised HCV waiver approvals may extend into 2022. Notice PIH 2021-34 provides instruction on expedited waiver processing that would allow for PHAs to continue to use specific CARES Act regulatory waivers for the Public Housing and Housing Choice Voucher (including Mainstream and Mod Rehab) programs. It also provides for an expedited approval process for one new waiver in the Housing Choice Voucher Program related to payment standards that will help facilitate leasing, which was not part of the CARES Act waivers. The regulatory waivers covered under Notice PIH 2021-34 are stated in the chart below.

VSHA's application was submitted by an authorized official and included VSHA's justifications for the waiver(s) to be granted. Notice PIH 2021-34 specifies that good cause justification must include: (a) why a PHA needs the waiver; (b) the impact on PHA operations or applicants if the waiver is not provided; and (c) the proposed waiver duration is limited to only the time necessary for a PHA to resume normal operations and not to exceed December 31, 2022.

Additionally, if requesting a waiver of Regulation 24 CFR § 982.503(b) Voucher Tenancy: New Payment Standard Amount, a PHA must certify that it meets one of the following good cause reasons (explained in further detail in Notice PIH 2021-34): (1) The PHA's jurisdiction is in a Fair Market Rent (FMR) area identified by HUD to have significant rental market fluctuations, where an increase in the PHA's payment standards up to 120 percent of the FMR may help the PHA more quickly respond to local circumstances (a list of these FMR areas is attached to Notice 2021-34); (2) Utilization Rate is lower than 98 percent for the current year-to-date or more than a 5 percent reduction between years 2019 and 2021; or (3) less than 85 percent of the PHA's vouchers issued in the last six months have leased. If your PHA adopts this waiver, please notify *PIH_Expedited_Waivers@hud.gov* if it elects to change its payment standards back to the basic range between 90 and 110 percent based on the FY 2022 FMR.

After reviewing the waiver request(s) and considering VSHA's stated justification(s) of good cause, HUD: (1) finds there is good cause to waive, and hereby waives, the regulations and/or requirements marked "APPROVED" in the "Waiver Status" column and/or (2) finds there is not good cause to waive, and therefore does not waive, the regulations and/or requirements marked "NOT APPROVED" in the "Waiver Status" column.

List of expedited regulatory waivers

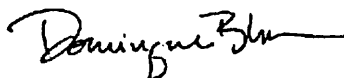
Waiver Requested	Waiver Status/Term Expiration	Waiver Name	Regulation	Summary of relief from HUD Requirements
Yes	APPROVED: Expiration 12/31/2022	Increase in Payment Standard During Housing Assistance Payment (HAP) Contract Term	24 CFR § 982.505(c)(4)	PHAs have the option to increase the payment standard for the family at any time after the effective date of the increase, rather than waiting for the next regular reexamination.
Yes	APPROVED: Expiration 10/1/2022	SEMAP Score	24 CFR § 985.105 24 CFR § 985.101	PHAs with a fiscal year end 3/31/22, 6/30/22, or 9/30/22, may request to waive the application of SEMAP in its entirety, only if the PHA has a SEMAP indicator affected directly or indirectly because of the disruption to PHA operations caused by its adoption of available CARES Act waivers.

Waiver Requested	Waiver Status/Term Expiration	Waiver Name	Regulation	Summary of relief from HUD Requirements
		Term of Voucher: Extensions of Term	24 CFR § 982.303(b)(1)	Allows PHAs to grant a family one or more extensions of the initial voucher term regardless of the policy described in the Administrative Plan. PHAs should ensure consistency with these requests and remain in compliance with the PHA's informally adopted interim standard.
Yes	APPROVED: Expiration 12/31/2022	Homeownership: Max. Term of Assistance	24 CFR § 982.634(a)	Allows a PHA to extend homeownership assistance for up to one additional year.
Yes	APPROVED: Expiration 12/31/2022	Voucher Tenancy: New Payment Standard Amount	24 CFR § 982.503(b)	PHAs may request an expedited waiver to allow for establishment of payment standards from 111 to 120 percent of the FMR.

All waiver approvals are set to expire at the end of the term requested or December 31, 2022, whichever is earliest, unless an alternative limit is provided by HUD. If any provision of these waivers or their application to any HUD requirement is made invalid by PHA omission or is no longer needed due to changing circumstances, HUD reserves the right to revoke all or a portion of these waivers at any time.

Should you have any questions, please contact the Waiver Processing Team at PIH_Expedited_Waivers@hud.gov.

Sincerely,



Dominique Blom
General Deputy Assistant Secretary

Vermont State Housing Authority

Strategic Plan Review of 2022
Commitments and 2021-22 Benchmarks



Presented to the Board of Commissioners
May 25, 2022

Strategic Plan Review of 2022 Commitments and 2021-22 Benchmarks

In the fall of 2020, the Vermont State Housing Authority Board of Commissioners and Executive Staff launched a strategic planning process which included input from staff. The results of this work are summarized in the attached, "Strategic Plan to Date" document, dated December 20, 2020.

This report details the recent work of VSHA's management team which includes a review of "Our Commitments by 2022" and Our 2021-22 Benchmarks."

I am proud and humbled of all that VSHA has accomplished in the two years since developing the Strategic Plan, as I'm sure the Board will be upon review of this detailed report.

As an organization, we will continue to develop, focusing on "Our Vision for 2023" and "Our Guiding Principles."

Participating Management Staff:

Kathleen Berk, Executive Director (ED)
Susan Kuegel, Director Property & Asset Management
Ellen Danahy Liptak, Director, HR & Administration
Kelly Pembroke, Director, Finance & Information Systems
Kelli Robinson, Director, Housing Program Administration
Ann Blanchard, Senior Accountant
Daniel Blankenship, Homeless Services Coordinator
Iris Gilbert, Property & Compliance Manager
Samantha Green, Director of Field Services
Morgan Ledo, VSHA Staff Federation
Tyson Leno, Director of Maintenance
Bethany Lunn, Housing Program Administration Coordinator
Tyler Maas, Program Director, Accessory Dwelling Unit (ADU)
Liz Whitmore, Housing Choice Voucher Coordinator

Our Commitments by 2022

Following are our accomplishments to date.

- a) **Our financial position is stable, and operational systems are improved.**

b) Financial Position:

As of the February 2022 statements that were provided to the board, VSHA is operating \$127,203 ahead of budgeted projections. This figure is slightly lower than our position at this time last year, however we are seeing increases to our lease up rate and continue to push for additional fees through our managed services. I remain confident that VSHA will finish the year with a net gain.

c) Operational Systems are Improved: Significant upgrades have been made in this area –

Security – VSHA has made many improvements to the security of our systems. We are now requiring MFA (multi-factor authenticator) and have upgraded our firewall and switches. Completing out our final phase for 2022 is the addition of endpoint anti-virus, email scrubber, patching, monitoring, and remote support tools. These tools will be installed and supported with the assistance of Resilient Networks.

New software –

- The addition of PayData to process payroll, track employee leave and use for overall HR paperwork will be a significant use of new technology. Through the click of a button, we will be giving each employee the information needed to pick benefits, update paperwork, and fill out timesheets/expense claims. The use of this software will eliminate manually filling out paperwork and give all staff instant results by allowing them to have all their information in one spot and the ability to update/change as they need to.
- The migration of Spectra used for our Property Management and Accounting departments to PHA-Web will be another major upgrade. The highlights of this software are again the use of technology to perform what is now being done manually. Automated work orders, ability for online payments and ACH (automated clearing house) collections, tenant rent/subsidy calculations and move in/move out processes are just a few of the many automated services.
- Remote deposit is the last major area of upgrades for the Accounting department. This was brought live in March 2022, and we are seeing considerable time savings on a daily basis.

d) Our reputation for being a great place to work is expanding

- Staff appreciate being recognized (some staff members posted VSHA events to their social media).
- Telework policy has increased morale and work-life balance leading to staff retention and recruitment of highly qualified staff.
- Flex scheduling appreciated.

- Staff survey – 68% would recommend VSHA as a place to work.
- Apply to be the best place to work in November 2022.

e) Statewide housing policy discussions defer to us for leadership.

- VT Legislature is routinely inviting ED in to testify on various housing initiatives/bills
- Agency of Administration / Department of Housing and Community Development defers to VSHA for administering / establishing policy on Vermont Emergency Rental Assistance Program
 - Including routine discussions with Assistant Secretary of Administration and Commissioner of DHCD (Department of Housing & Community Development)
- VSHA is a member of State-Agency Work Group (Housing Recovery Working Group)
 - Members include Vermont Housing and Conservation Board, Vermont Housing Finance Agency, Department of Housing and Community Development, Agency of Human Resources, Office of Economic Opportunity.
 - Objective is to collaborate on housing related initiatives across programs
- VSHA being looked to administer Renter Risk pool program.
 - In early January 2022, the Vermont Legislature, through the Budget Adjustment Act, awarded the Agency of Human Services Office of Economic Opportunity \$5 million to stand up a renter risk pool program. For the past several months, staff of VHFA (VT Housing Finance Agency), VSHA, AHS (Agency of Human Services) have been meeting to develop a program for Vermont.
 - AHS & VHFA would like VSHA to administer.

f) Housing Programs creatively adapting to changing needs.

- HCV (housing choice voucher) – preferences (COVID response, Move-on (CARES), PBV (project-based vouchers) commitments (projects), new best practice to fill gaps and services (using HAP [housing authority payment] \$\$ to fund services)
- PBV Homeless Response Initiative
- Waiver authority and increased payment standards – responding to market conditions
- HOPWA (housing opportunities for persons with aids) – converting to HCV, streamlining
- ADU program development – a statewide conversation
- Evolution of emergency rental assistance – adapting to changing needs

Our 2021-22 Benchmarks

a) We have grown our capabilities, upgraded technology, and are working at a higher capacity.

- Modernization of Systems and Processes completed and/or underway across the agency

Department	Initiative	Date	Lead
Info Technology & Finance	Multifactor Authentication	March 2022	Kelly Pembroke
	Email Scrubbing	April 2022	Kelly Pembroke
	Mandatory Use of VPN (virtual private network)	April 2022	Kelly Pembroke
Info Technology & Finance/Human Resources	PayData <ul style="list-style-type: none"> • Payroll • HRIS (HR Information System) • Employee portal 	May-June 2022	Kelly Pembroke & Ellen Liptak
Housing Program Administration	Implemented PHA-Web <ul style="list-style-type: none"> • Implemented paperless office environment • Teleworking capabilities 	Nov 2019-present	Kelli Robinson Beth Lunn Samantha Green Liz Whitmore
Housing Program Administration	Participant Communication Portals	April – June 2022	Kelli Robinson Beth Lunn Samantha Green Liz Whitmore
	Participant Briefing & Landlord videos	June – Sept 2022	Kelli Robinson Beth Lunn Samantha Green Liz Whitmore

Department	Initiative	Date	Lead
Property & Asset Management	Conversion to PHA-Web <ul style="list-style-type: none"> • Provides web-based access for users • Automates MHP (multifamily housing program) tenant data base • Automates work orders and inspections • Teleworking capabilities • Delete the need for a separate tenant accounts receivable program 	May-June 2022	Susan Kuegel Iris Gilbert Tyson Leno
Housing and Program Policy and Development	Use of WSD Digital to administer VERAP <ul style="list-style-type: none"> • Provides organizational capacity 	April 2021-present	Tyler Maas Kelly Pembroke Kathleen Berk

b) Staff report feeling productive and appreciated at the end of the workday. Following are initiatives / events for this year.

- Management negotiated a fair 3-year contract with staff
- Telework policy implemented June 2021
- Initial Employee Engagement Survey completed March 2022
 - There were 38 participants.
 - Overall, employees answered positively to 32 of 40 questions.
 - Areas of improvement center around transparency and communications, particularly around management providing timely and accurate information and business objectives and priorities.
 - Some individuals feel stressed with their workload and deadlines.
- Employee Appreciation Day March 4, 2022– gave \$10 DD cards
- Monthly Coffee Hour – hosted by HR
- Staff provide training on various topics (VSHA Roundtable) including:
 - Safety & Repairs
 - Workstation Exercise
 - How about those Benefits? (6/8/22)
 - Homelessness (7/20/22)
- Agency-sponsored Corporate Cup race on 5/19/22 – 17 participants

- Summer and Holiday parties
 - Summer gathering to include building dedication ceremony for RMW
 - Red sox game – in the planning stages for Summer 2022
- c) We have achieved greater visibility in the community and are getting substantive credit for all we do.**
- Member of Governor’s Housing Council
 - Member of Consolidated Plan Advisory Committee
 - Member of National Association of Housing and Redevelopment Organizations (NAHRO)
 - Member of Section 8 Subcommittee
 - Member of Public Housing Authority Director’s Association
 - Member of VT Coalition to End Homelessness
 - Member of Vermont Affordable Housing Coalition
 - Member of Vermont Housing Managers Association
 - Member of Fair Housing Subcommittee
 - Recognized as one of the four major housing organizations in VT, alongside of Vermont Housing and Conservation Board, Vermont Housing Finance Agency, Department of Housing and Community Development
 - Field Staff are members of their local Housing Review Team / Continuum of Care
 - Staff that are not engaged will be asked to participate
 - Grant agreements with Agency of Human Services include: VT Department of Mental Health "Subsidy & Care"; VT Department of Health "Bridge to HOPWA"; Housing Opportunity Program (unit inspections); VSHA administers Family Unification Program (FUP) and Foster Youth to Independences (FYI) initiative
 - Site Managers are serving on local Child Protective Teams
- d) Visibility Commitments for 4th quarter 2022 and 2023**
- Develop better relationships with Property Owners and Agents
 - Develop landlord engagement initiatives
 - Redevelop Agency website
- e) Our programs are demonstrating greater effectiveness and efficiency.**
- New initiatives, growing the voucher through targeted funding opportunities and maximizing PBV cap authority to leverage affordable housing units.
 - Use of web technology across agency programs
 - Due to a lack of organizational capacity of some agencies, and their inability to consistently meet HUD CoC (Department of Urban Development Continuum of Care) Program standards, VSHA lowered the number of service providers - in cooperative agreement with agencies: Rapid Rehousing project reduced service providers by four (4), formerly 11, and added two higher performing agencies (United Counseling Services-Bennington and Pathways VT-pending) and

Permanent Supportive Housing "Shelter + Care" project reduced service providers by eight (8), formerly 15.

- Voucher utilization for the tenant-based rental assistance program remains strong, which was made possible by being approved for and implementing waiver authority. Goal of increasing voucher utilization to 98% of authorized units by 12/31/23.
- Vacancy rates across the managed housing portfolio began the year at 1.77% and has remained below the 3% goal through the first quarter of 2022.
- The P & AM Division has been working to strengthen relationships with organizations that support homeless families. This has resulted in an increase in the number of units housing formerly homeless families from 5.81% of the portfolio in January 2020 to 12.98% in March 22. The goal is to meet the state mandate of 15% in 2022.



VERMONT STATE HOUSING AUTHORITY

Strategic Plan to Date (December 2020)

STRATEGIC PLANNING TEAM

VSHA Board of Commissioners - Alex Farrell, Caryn Feinberg, Caprice Hover, Mary Miller, Cory Richardson, JoAnn Troiano

VSHA Staff – Kathleen Berk, Susan Kuegel, Kelly Pembroke, Arlene Shorten-Goodrich, Richard Williams

VSHA Staff Federation – Nathan Schmechel

HFI – Jonathan Bond

OUR HISTORY OF GROWTH (1968-2020)

1968 = Founded
1973 = Budget \$158,292 6 staff
1996 = Budget \$1,823,948 46 staff
2020 = Budget \$4,696,587 70 staff

OUR CURRENT MISSION *(under review)*

To promote and expand the supply of affordable rental and home ownership opportunities on a statewide basis.

OUR GUIDING PRINCIPLES

- Fulfilling our mission with both knowledge and compassion
- Creatively addressing housing needs in partnership with others
- Valuing our workforce by offering professional growth opportunities, flexible scheduling, and striving for competitive compensation
- Being transparent in all financial, policy and programmatic decisions

OUR VISION FOR 2023

- > Finances are strong and operations are modernized
- > Our investment in human capital is robust and ongoing
- > Staff growth and development is embedded in our culture
- > We have a prominent seat at the table with policy makers
- > Our expertise in rental housing is acknowledged and sought after
- > Tenant and community needs drive our programming

OUR COMMITMENTS BY 2022

- Our financial position is stable, and operational systems are improved
- Our reputation for being a great place to work is expanding
- Statewide housing policy discussions defer to us for leadership
- Our housing programs are creatively adapting to changing needs

OUR 2021-22 BENCHMARKS

- > We have grown our capabilities, upgraded technology, and are working at higher capacity.
- > Staff report feeling productive and appreciated at the end of the workday.
- > We have achieved greater visibility in the community and are getting substantive credit for all we do.
- > Our programs are demonstrating greater effectiveness and efficiency.

4-III.C. SELECTION METHOD

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the PHA will use [24 CFR 982.202(d)].

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:

1. Disaster Preference: This preference is available to Vermont families who are displaced due to fire, flood, natural disaster, or condemnation by a local, State, or Federal Agency.
2. Housing Instability Preference: This preference is available to families with incomes at 30% of Area Median Income (AMI) or below who are at risk of homelessness or housing instability and meet the following definitions:
 - One or more individuals within the household can demonstrate a risk of experiencing homelessness or housing instability by providing:
 1. a past-due utility or rent notice, or eviction notice; **and/or**
 2. documentation of unsafe or unhealthy living conditions; **and/or**
 3. expiration of time-limited rental assistance benefits operated by a program located in Vermont (examples: Vermont Emergency Rental Assistance Program, Rapid Rehousing Housing, etc.); **or**
 4. any other evidence of risk, as determined by the PHA.
3. Move-Up Preference: This preference is available to families with incomes above 30% of AMI up to 50% of AMI who meet the following criteria:
 - actively receiving rental assistance benefits through a VSHA-administered rental assistance program; **and**
 - family is certified to be in compliance with benefit program & tenancy requirements
4. Preference for non-elderly persons with disabilities transitioning out of institutions:

This preference is available for non-elderly disabled families who are:

- transitioning out of an institution or other segregated settings; **or**
- at serious risk of institutionalization, are homeless, or at risk of becoming homeless.

Verification of eligibility will be obtained upon selection from the waiting list.

5. Preference for Vermont Residents: This preference is available for families who either live or work in the state of Vermont and can prove residency through a verified current address or verification from an employer.

DRAFT

INCOME TARGETING

Income Targeting 1(b)(2)

HUD requires that extremely low-income (ELI) families make up at least 75% of the families admitted to the HCV program during the PHA's fiscal year. ELI families are those with annual incomes at or below 30% of the area median income. To ensure this requirement is met, a PHA may skip non-ELI families on the waiting list in order to select an ELI family.

Low income families admitted to the program that are "continuously assisted" under the 1937 Housing Act [24 CFR 982.4(b)], as well as low-income or moderate-income families admitted to the program that are displaced as a result of the prepayment of the mortgage or voluntary termination of an insurance contract on eligible low-income housing, are not counted for income targeting purposes [24 CFR 982.201(b)(2)(v)].

PHA Policy

The PHA will monitor progress in meeting the ELI requirement throughout the fiscal year. Extremely low-income families will be selected ahead of other eligible families on an as-needed basis to ensure the income targeting requirement is met.

Order of Selection

The PHA system of preferences may select families either according to the date and time of application, or by a random selection process [24 CFR 982.207(c)]. When selecting families from the waiting list PHAs are required to use targeted funding to assist only those families who meet the specified criteria, and PHAs are not permitted to skip down the waiting list to a family that it can afford to subsidize when there are not sufficient funds to subsidize the family at the top of the waiting list [24 CFR 982.204(d) and (e)].

PHA Policy

Families will be selected from the waiting list based on the targeted funding or selection (or local) preference(s) for which they qualify, and in accordance with the PHA's hierarchy of preferences, if applicable. Within each targeted funding or preference category, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the PHA. Documentation will be maintained by the PHA as to whether families on the list qualify for and are interested in targeted funding. If a higher placed family on the waiting list is not qualified or not

interested in targeted funding, there will be a notation maintained so that the PHA does not have to ask higher placed families each time targeted selections are made.

Local Preferences

Local preferences will be used to select families from the waiting list.

The VSHA has selected the following system to apply local preferences:

- The Disaster Preference is ranked the highest of all local preferences.
- The Housing Instability, Move-Up and Non-elderly persons with disabilities transitioning out of institutions Preferences will be treated equally and ranked second (after the Disaster Preference)
- The Preference for Vermont Residents will be ranked third, after the Housing Instability, Move-Up, and Non-elderly persons with disabilities transitioning out of institution Preferences.
- All other eligible applicants will be ranked below applicants who qualify for preference, as defined in Section 4.III.C.

Among Applicants with Equal Preference Status

Among applicants with equal preference status, the waiting list will be organized by **date and time**. Applicants with local preference status will be served before families without local preference status.

4-III.D. NOTIFICATION OF SELECTION

Families will be notified in writing when their application has been selected from the waiting list.

4-III.E. THE APPLICATION INTERVIEW

VSHA does not interview applicants.

4-III.F. COMPLETING THE APPLICATION PROCESS

The PHA must verify all information provided by the family (**see Chapter 7**). Based on verified information, the PHA must make a final determination of **eligibility (see Chapter 3)** and must confirm that the family qualified for any special admission, targeted admission, or selection preference that affected the order in which the family was selected from the waiting list.

PHA Policy

If the PHA determines that the family is ineligible, the PHA will send written notification of the ineligibility determination within 10 business days of the determination. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an **informal review (Chapter 16)**.