

**DATA COLLECTION TOOL  
FOR INFORMATION TO  
COMPLETE FORM HUD 50075-HIGH  
PERFORMER**

## Trumbull Metropolitan Housing Authority

**The following information is needed to complete the form HUD-50075-HP Annual PHA Plan.**

**A. PHA Information**

**PHA Name:** Trumbull Metropolitan Housing Authority

**PHA Code:** OH008

**PHA Type:**  Small  High Performer

**PHA Plan for Fiscal Year Beginning:** (MM/YYYY): 07/2021

**PHA Inventory** (based on ACC units at time of FY beginning above)

**Number of Public Housing (PH) Units:** 1,249

**Number of Housing Choice Vouchers (HCVs):** 1,086

**Total Combined** 2,335

**PHA Plan Submission Type:**  Annual Submission  
 Revised Annual Submission

**The following are the specific locations where the public may obtain copies of the 2021 Annual Plan:**

TMHA ADMINISTRATIVE OFFICE	4076 Youngstown Rd., S.E. Warren, OH 44484
TRUMBULL HOMES	1970 Hazelwood Ave. Warren, OH 44484
HIGHLAND TERRACE	377 Lane Dr., SW Warren, OH 44483
RIVERVIEW BUCKEYE	700 Buckeye St. Warren, OH 44485
MCKINLEY TOWERS	425 Seneca St., Niles, OH 44446
VALLEY WEST	529 Brookfield Ave. Masury, OH 44438

**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	
Lead HA:					

**Have the following PHA Plan elements been revised by the PHA since its last PHA Plan submission?**

- (a)  **Statement of Housing Needs and Strategy for Addressing Housing Needs**
  - Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions**
  - Financial Resources**
  - Rent Determination**
  - Homeownership Programs**
  - Safety and Crime Prevention (including VAWA)**
  - Pet Policy**
  - Substantial Deviation**
  - Significant Amendment /Modification**
- (b) The PHA must submit its Deconcentration Policy for Field Office Review **(See attachment oh008b01)**.

## B.1 Revision of PHA Plan Elements.

### Statement of Housing Needs and Strategy for Addressing Housing Needs

#### Statement of Housing Needs

<b>Housing Needs of Families in the Jurisdiction by Family Type</b>							
<b>Family Type</b>	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Loca-tion
Income <= 30% of AMI	<b>53,452</b>	5	5	5	3	3	3
Income >30% but <=50% of AMI	<b>43,554</b>	4	4	4	3	3	3
Income >50% but <80% of AMI	<b>41,574</b>	3	3	3	3	3	3
Elderly	<b>43,752</b>	4	3	3	4	3	3
Families with Disabilities	<b>20,589</b>	3	3	3	5	3	3
White	<b>176,083</b>	3	3	3	3	3	3
Black/African American	<b>16,458</b>	3	3	3	3	3	3
Hispanic	<b>3,054</b>	3	3	3	3	3	3

<b>Housing Needs of Families on the Waiting List</b>			
Waiting list type: (select one) <input type="checkbox"/> Section 8 tenant-based assistance <input checked="" type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	283	92%	242
Extremely low income <=30% AMI	261	92%	
Very low income (>30% but <=50% AMI)	15	5%	
Low income (>50% but <80% AMI)	5	2%	
Families with children	131	46%	
Elderly families	30	11%	
Families with Disabilities	51	18%	
White	175	63%	
Black/African American	105	37%	
American Indian/Alaska Native	1	0.4%	
Asian	1	0.4%	
Native Hawaiian/Other Pacific Islander	0	0%	
Hispanic	1	0.4%	
<b>Characteristics by Bedroom Size (Public Housing Only)</b>			
1BR	117	41%	
2 BR	88	31%	
3 BR	59	21%	
4 BR	11	4%	
5 BR	8	3%	
5+ BR	N/A	N/A	
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: How long has it been closed (# of months)? <b>N/A</b> Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes <b>N/A</b> Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

<b>Housing Needs of Families on the Waiting List</b>			
Waiting list type: (select one) <input checked="" type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	119		
Extremely low income <=30% AMI	109	92%	
Very low income (>30% but <=50% AMI)	10	8%	
Low income (>50% but <80% AMI)	0	0%	
Families with children	83	70%	
Elderly families	2	2%	
Families with Disabilities	14	12%	
White	27	23%	
Black/African American	92	77%	
American Indian/Alaska Native	0	0%	
Asian	0	0%	
Native Hawaiian/Other Pacific Islander	0	0%	
Hispanic	2	2%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	N/A	N/A	
2 BR	N/A	N/A	
3 BR	N/A	N/A	
4 BR	N/A	N/A	
5 BR	N/A	N/A	
5+ BR	N/A	N/A	
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If yes: How long has it been closed (# of months)? <b>28</b> Does the PHA expect to reopen the list in the PHA Plan year? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

## **Strategies for Addressing Housing Needs**

### **Need: Shortage of affordable housing for all eligible populations**

TMHA shall maximize the number of affordable units available to the TMHA within its current resources by:

- Employ effective maintenance and management policies to minimize the number of public housing units off-line
- Reduce turnover time for vacated public housing units
- Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources
- Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- Undertake measures to ensure access to affordable housing among families assisted by the TMHA, regardless of unit size required
- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies

TMHA shall increase the number of affordable units by:

- Apply for additional Section 8 units should they become available
- Leverage affordable housing resources in the community through the creation of mixed-finance housing
- Pursue housing resources other than public housing or Section 8 tenant-based assistance

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

TMHA shall target available assistance to families at or below 30% of AMI by:

- Adopting rent policies to support and encourage work

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

TMHA shall target available assistance to families at or below 50% of AMI by:

- Employ admissions preferences aimed at families who are working
- Adopt rent policies to support and encourage work

**Need: Specific Family Types: The Elderly**

TMHA shall target available assistance to the elderly by:

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

**Need: Specific Family Types: Families with Disabilities**

TMHA shall target available assistance to Families with Disabilities by:

- Carrying out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing
- Affirmatively market to local non-profit agencies that assist families with disabilities

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

TMHA will increase awareness of TMHA resources among families of races and ethnicities with disproportionate need: **N/A**

TMHA will conduct activities to affirmatively further fair housing by:

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

**Reason for Selecting Strategies:**

- Funding constraints
- Staffing constraints
- Limited availability of sites for assisted housing
- Extent to which particular housing needs are met by other organizations in the community
- Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to TMHA
- Influence of the housing market on TMHA programs
- Results of consultation with local or state government
- Results of consultation with residents and the Resident Advisory Board
- Results of consultation with advocacy groups



## **Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions**

### **Public Housing**

#### (1) Eligibility

##### Equal Access

The term "family" includes, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

- (1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person or any other single person; or
- (2) A group of persons residing together and such group includes, but is not limited to:
  - (i) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
  - (ii) An elderly family;
  - (iii) A near-elderly family;
  - (iv) A disabled family;
  - (v) A displaced family; and
  - (vi) The remaining member of a tenant family.

Disabled family means a family whose head (including co-head), spouse or sole member is a person with a disability.

Elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 62 years of age.

Near elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62.

Sexual orientation means homosexuality, heterosexuality or bisexuality.

Gender identity means actual or perceived gender-related characteristics.

Trumbull Metropolitan Housing Authority verifies eligibility for admission to public housing when families are within ninety (90) days of being offered a unit and as soon as possible after receipt of a completed application.

TMHA uses the following non-income screening factors to establish eligibility for admission to public housing:

- Criminal or Drug-related activity
- Rental history
- Utility Companies

The Housing Authority requests criminal records from the following enforcement agencies for screening purposes:

- Local law enforcement agencies
- State law enforcement agencies
- Court Records – Public Access
- ***Resident Check***

## (2) Selection and Assignment

Selection for admission to public housing shall be made from TMHA's current waiting list in accordance with date and time of application and applicable preference(s) as follows.

## (3) Preferences

TMHA does not plan to exceed the federal targeting requirements by targeting more than 40% of all new admissions to public housing to families at or below 30% of the median area income.

It is the policy of TMHA that transfers will take precedence over new admissions in the following circumstances:

- Emergencies
- Over-housed
- Under-housed
- Medical justification
- Administrative reasons determined by TMHA

TMHA plans to employ the following admission preferences for admission to public housing:

**Priority Preference**

- 1 - Working families
- 1 - current members of the U.S. Armed Forces and their families, veterans or surviving spouses of veterans
- 1 - Victims of Federally declared disaster areas
- 1 - Homeless (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)
- 10 - Special limited preference for Riverview Apartments only. A Special limited preference will be given to Veterans who have enrolled in, participated in and successfully completed the terms of the Department of Veteran's Affairs (VA) Transition In Place (TIP) program for homeless veterans implemented by Family and Community Services (FCS)

Among applicants on the waiting list with equal preference status applicants are selected by date and time of application.

In relationship of preferences to income targeting requirements, the pool of applicant families ensures that TMHA will meet income targeting requirements.

(4) Unit Assignment

Applicants are ordinarily given one (1) vacant unit choice before they fall to the bottom of or are removed from the waiting list. This policy is consistent across all waiting list types.

(5) Maintaining Waiting List

Trumbull Metropolitan Housing Authority maintains a sub-jurisdictional list and a site-based waiting list. Interested persons may apply for admission to public housing at the main administrative office located at 4076 Youngstown Rd., SE, Suite 101 and at the following development site management offices:

- Trumbull Homes
- Highland Terrace

- Riverview Apartments
- McKinley Towers
- Valley West
- Online at: [www.trumbulltmha.org](http://www.trumbulltmha.org)

Trumbull Metropolitan Housing Authority plans to operate eleven (11) site-based waiting lists in the coming year. None of these lists are new for the upcoming year. See **attachment oh008c01** for Occupancy Data Site-Based Waiting Lists.

Families may be on no more than three (3) of the site-based waiting lists simultaneously.

Interested persons can obtain more information about and sign up to be on the site-based waiting lists at the following locations:

- TMHA main administrative office
- All TMHA development management offices
- Management offices at developments with site-based waiting lists
- At the development to which they would like to apply

(6) Occupancy

Applicants and residents may use the following reference materials to obtain information about the rules of occupancy of public housing.

- TMHA-resident lease
- TMHA's Admissions and Continued Occupancy Policy

Residents must notify TMHA of changes in family composition:

- At an annual reexamination and lease renewal
- At any time family composition changes
- Any time there is an increase or decrease in income

(7) Deconcentration and Income Mixing

***The PHA has performed its annual deconcentration and income mixing analysis to determine if the PHA has any general occupancy public housing developments covered by the deconcentration rule. The analysis results follow:***

***The PHA does have general occupancy public housing developments covered by the deconcentration rule.***

***None of the covered developments have average incomes that fall above or below the Established Income Range.***

## **Section 8**

### (1) Eligibility

#### Equal Access

The term "family" includes, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

- (1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person or any other single person; or
- (2) A group of persons residing together and such group includes, but is not limited to:
  - (i) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
  - (ii) An elderly family;
  - (iii) A near-elderly family;
  - (iv) A disabled family;
  - (v) A displaced family; and
  - (vi) The remaining member of a tenant family.

Disabled family means a family whose head (including co-head), spouse or sole member is a person with a disability.

Elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 62 years of age.

Near elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62.

Sexual orientation means homosexuality, heterosexuality or bisexuality.

Gender identity means actual or perceived gender-related characteristics.

TMHA conducts screening to the extent of:

- Criminal or Drug-related activity only to the extent required by law or regulation

The Housing Authority requests criminal records from the following enforcement agencies for screening purposes:

- Local law enforcement agencies
- State law enforcement agencies

## (2) Waiting List Organization

Trumbull Metropolitan Housing Authority's waiting list for the Section 8 tenant-based assistance is not merged with any other program waiting list.

Interested persons may apply for admission to Section 8 tenant-based assistance at:

- TMHA main administrative office when waiting list is open

## (3) Search Time

TMHA does give extensions on standard 60-day period to search for a unit under the following circumstances:

- Up to 120 days from beginning of initial term as a reasonable accommodation. A written request from the family must be received by TMHA prior to expiration date of the voucher
- Up to maximum of 60 days at TMHA discretion for:
  - Extenuating circumstances such as hospitalization or family emergency within initial 60-day search time. Verification required
  - Family was prevented from finding a unit due to disability accessibility requirements or large size number of bedroom unit requirement. Search records verification required.

## (4) Preferences

TMHA does not plan to exceed the federal targeting requirements by targeting more than 75% of all new admissions to the Section 8 Program to families at or below 30% of the median area income.

TMHA plans to employ the following admission preferences for admission to Section 8 tenant-based assistance:

**Priority Preference**

- 1 - Veterans and Veteran's families
- 1 - Elderly/Disabled
- 1 - Victims of Federally declared disasters
- 1 - Families with children under 6 years of age with elevated blood lead level
- 1 - Homeless veterans
- 1 - *Foster Youth to Independence***

Among applicants on the waiting list with equal preference status applicants are selected by date and time of application.

In relationship of preferences to income targeting requirements, the pool of applicant families ensures that TMHA will meet income targeting requirements.

(5) Special Purpose Section 8 Assistance Programs

The policies governing eligibility, selection and admissions to any special-purpose Section 8 program administered by TMHA are contained in the following documents or other reference materials:

- The Section 8 Administrative Plan
- Briefing sessions and written materials

TMHA announces the availability of any special-purpose Section 8 program to the public through:

- Through published notices

## **Financial Resources**

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants (FY 2021 grants)</b>		
a) Public Housing Operating Fund	4,441,443.00	
b) Public Housing Capital Fund	3,216,553.00	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	5,345,556.00	
f) Resident Opportunity and Self- Sufficiency Grants	74,728.00	
g) Community Development Block Grant		
h) HOME		
Other Federal Grants (list below)		
FSS Program	119,097.00	PH supportive services
<b>2. Prior Year Federal Grants (unobligated funds only) (list below)</b>		
CFP Grant OH12E008501-19	211,593.00	Public housing capital improvements
CFP Grant OH12P008501-18	138,531.00	Public housing capital improvements
CFP Grant OH12P008501-19	1,584,766.00	Public housing capital improvements
CFP Grant OH12P008501-20	2,896,680.00	Public housing capital improvements
<b>3. Public Housing Dwelling Rental Income</b>	2,155,100.00	Public housing operations
<b>4. Other income (list below)</b>		
Interest on Investments	10,300.00	Public housing operations
Other Tenant Income	165,800.00	Public housing operations
Non-Dwelling Rent	4,500.00	Public housing operations
Other Income	20,500.00	Public housing & HCVP operations
<b>5. Non-federal sources (list below)</b>		
<b>Total resources</b>	<b>\$20,385,147.00</b>	



## **Rent Determination**

### **Public Housing**

#### (1) Income Based Rent Policies

##### a. Use of discretionary policies

TMHA will employ discretionary rent-setting policies for income-based rent in public housing.

##### b. Minimum Rent

TMHA has established a \$50.00 minimum rent for Public Housing Developments.

TMHA has adopted the following discretionary minimum rent hardship exemption policies.

#### Exemption for Hardship Circumstances

The Housing Authority shall immediately grant an exemption from application of the minimum monthly rent amount to any family unable to pay such amount because of financial hardship, which shall include situations in which:

- a. The family has lost eligibility or is awaiting an eligibility determination for a federal, state or local assistance program, including a family that includes a member who is an alien lawfully admitted for permanent residence under the Immigration and Nationality Act who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996;
- b. The family would be evicted as a result of the imposition of the minimum rent requirement;
- c. The income of the family has decreased because of changed circumstances, including loss of employment;
- d. A death in the family has occurred.

If the resident requests a hardship exemption and the Housing Authority reasonably determines the hardship to be of a temporary nature, an exemption shall not be granted during the 90-day period beginning upon the making of a request for the exemption. A resident shall not be evicted during the 90-day period for non-payment of rent. In such a case, if the

resident thereafter demonstrates that they financial hardship is of a long-term basis, the Housing Authority shall retroactively exempt the resident from applicability of the minimum rent requirement for such 90-day period.

c. Rents set at less than 30% than adjusted income

TMHA does not plan to charge rents at a fixed amount or percentage less than 30% of adjusted income.

d. Discretionary deductions and/or exclusion policies

TMHA does not plan to employ any discretionary (optional) deductions and/or exclusions policies.

e. Ceiling Rents

TMHA does not have ceiling rents.

f. Rent Re-determinations

Between annual income reexaminations, the tenant is required to report changes in income or family composition to TMHA such that the changes result in an adjustment to rent as follows:

- There is a loss or addition of a wage earner to the household
- There is a loss or addition of an income source

g. Individual Savings accounts (ISAs)

TMHA does not plan to implement individual savings accounts for residents as an alternative to the required 12-month disallowance of earned income and phasing in of the rent increase in the next year.

(2) Flat Rents

TMHA used the following sources of information in setting the market-based flat rents to establish comparability.

- Guidelines found in the 2015 Appropriations Act (PIH 2015-13) in determining the Public Housing Flat Rent schedule. TMHA will

establish a flat rent for each public housing unit that is no less than 80% of the applicable Fair Market Rent (FMR)

## **Section 8**

### (1) Payment Standards

TMHA's payment standard is:

- 100% of FMR

TMHA reevaluates the payment standards for adequacy annually and considers the following factors in its assessment of the adequacy:

- Success rates of assisted families
- Rent burdens of assisted families

### (2) Minimum Rent

TMHA has established a minimum rent of \$50.00.

#### **Hardship Requests for an Exception to Minimum Rent**

TMHA recognizes that in some circumstances even the minimum rent may create a financial hardship for families. TMHA will review all relevant circumstances brought to TMHA's attention regarding financial hardship as it applies to the minimum rent. The following section states TMHA's procedures and policies in regard to minimum rent financial hardship as set forth by the Quality Housing and Work Responsibility Act of 1998. HUD has defined circumstances under which a hardship could be claimed (24 CFR 5.630).

#### **Criteria for Hardship Exception**

In order for a family to qualify for a hardship exception, the family's circumstances must fall under one of the following HUD hardship criteria:

- The family has lost eligibility or is awaiting an eligibility determination for Federal, State or local assistance, including a family with a member who is a non-citizen lawfully admitted for permanent residence under the Immigration and Nationality Act, and who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996.
- The family would be evicted as a result of the imposition of the minimum rent requirement.

- The income of the family has decreased because of changed circumstances, including loss of employment, death in the family, or other circumstances as determined by TMHA or HUD.

### **TMHA Notification to Families of Right to Hardship Exception**

TMHA will notify all families subject to minimum rents of their right to request a minimum rent hardship exception. "Subject to minimum rent" means the minimum rent was the greatest figure in the calculation of the greatest of 30% of monthly adjusted income, 10% of monthly income, minimum rent or welfare rent.

If the minimum rent is the greatest figure in the calculation of Total Tenant Payment, TMHA staff will include a copy of the notice regarding hardship request provided to the family in the family's file.

TMHA notification will advise families that hardship exception determinations are subject to TMHA review and hearing procedures.

TMHA will review all family requests for exception from the minimum rent due to financial hardships.

All requests for minimum rent hardship exceptions are required to be in writing.

TMHA will request documentation as proof of financial hardship.

TMHA will use its standard verification procedures to verify circumstances which have resulted in financial hardship.

Requests for minimum rent exception must include a statement of the family hardship that qualify the family for an exception.

### **Suspension of Minimum Rent**

TMHA will grant the minimum rent exception to all families who request it, effective the first of the following month.

The minimum rent will be suspended until TMHA determines whether the hardship is;

- Covered by statute
- Temporary or long term

"Suspension" means that TMHA must not use the minimum rent calculations until TMHA has made the decision.

During the minimum rent suspension period, the family will not be required to pay a minimum rent and the housing assistance payment will be increased accordingly.

If TMHA determines that the minimum rent is not covered by statute, TMHA will impose a minimum rent including payment for minimum rent from the time of suspension.

### **Temporary Hardship**

If TMHA determines that the hardship is temporary, a minimum rent will not be imposed for a period of up to 90 days from the date of the family's request. At the end of the temporary suspension period, a minimum rent will be imposed retroactively to the time of suspension.

TMHA will offer a repayment agreement to the family for any such rent not paid during the temporary hardship period. (See "Owner and Family Debts to the TMHA" chapter for Repayment agreement policy).

### **Long-Term Duration Hardships** [24 CFR 5.616(c)(3)]

If TMHA determines that there is a qualifying long-term financial hardship, TMHA must exempt the family from the minimum rent requirements for as long as the hardship continues. The exemption from minimum rent shall apply from the first day of the month following the family's request for exemption.

### **Retroactive Determination**

TMHA will reimburse the family for any minimum rent charges which took effect after October 21, 1998 that qualified for one of the mandatory exceptions.

If the family is owed a retroactive payment, TMHA will provide reimbursement in the form of a cash refund to the family.

TMHA's definition of a cash refund is a check made out to the family.

## **Homeownership Programs**

### **Public Housing**

TMHA does not administer any homeownership programs for public housing.

### **Section 8 Tenant Based Assistance**

TMHA does administer a homeownership program for Section 8.

TMHA has not established eligibility criteria for participation in its Section 8 Homeownership Option Program in addition to HUD criteria.

## **Safety and Crime Prevention**

TMHA's plan for safety and crime preventions to ensure the safety of the public housing residents is addressed below.

### A. Need for measures to ensure the safety of public housing residents:

1. Description of the need for measures to ensure the safety of public housing residents.
  - High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to TMHA's developments
  - Residents fearful for their safety and/or the safety of their children
  - People on the waiting list unwilling to move into one or more developments due to perceived and/or actual levels of violent and/or drug-related crime
2. Information or data used by TMHA to determine the need for TMHA actions to improve safety of residents:
  - Safety and security survey of residents
  - Analysis of crime statistics over time for crimes committed "in and around" public housing authority
  - Resident reports
  - TMHA employee reports
  - Police reports
  - Demonstrable, quantifiable success with previous or ongoing anticrime/antidrug programs

3. Developments that are most affected:

- Trumbull Homes
- Fairview Gardens
- Riverview (Tod)
- Riverview (Buckeye)

B. Crime and Drug Prevention activities TMHA has undertaken or plans to undertake in the next TMHA fiscal year.

1. List of crime prevention activities:

- Contracting with outside and/or resident organizations for the provision of crime and/or drug-prevention activities
- Activities targeted to at-risk youth, adults or seniors

2. Developments that are most affected:

- Trumbull Homes
- Fairview Gardens
- Riverview (Tod)
- Riverview (Buckeye)

C. Coordination between TMHA and the police.

1. Description of the coordination between TMHA and the appropriate police precincts for carrying out crime prevention measures and activities:

- Police provide crime data to housing authority staff for analysis and action
- Police have established a physical presence on housing authority property (e.g., community policing office, officer in residence)
- Police regularly testify in and otherwise support eviction cases
- Police regularly meet with TMHA management and residents
- Agreement between TMHA and local law enforcement agency for provision of above-baseline law enforcement services

2. Developments that are most affected:

- Trumbull Homes
- Fairview Gardens
- Riverview (Tod)
- Riverview (Buckeye)

## **Violence Against Women Act (VAWA)**

Trumbull Metropolitan Housing Authority has incorporated in its PHA Plan goals and objectives, and policies and procedures the applicable provisions of the Violence Against Women and Reauthorization Act of 2013 (VAWA) to support or assist victims of domestic violence, dating violence, or stalking.

The TMHA goal to provide an improved living environment is being met by its effort to implement measures to assist victims of domestic violence in avoiding their abusers and continuing occupancy in public housing.

TMHA has partnered with local sister agencies and is participating in in-service trainings with these sister agencies. TMHA's goal is to support and assist victims of domestic violence by official notification and referral to agencies.

In addition, TMHA has amended its policies and procedures to include language and applicable provisions of the VAWA. The required notification has been provided to all tenants of public housing and to participants and landlords under the Housing Choice Voucher Program. It is TMHA's intent to maintain compliance with all applicable requirements imposed by VAWA.

TMHA efforts may include to:

- Provide and maintain housing opportunities for victims of domestic violence, dating violence, or stalking;
- Create and maintain collaborative partnerships between TMHA, victim service providers, law enforcement authorities, and other supportive groups to promote the safety and well-being of victims of domestic violence, dating violence, or staking (whether actual or imminent threat) who are assisted by TMHA;
- Ensure the physical safety of victims of domestic violence, dating violence, or stalking (whether actual or imminent threat) who are assisted by TMHA; maintain compliance with all applicable requirements imposed by VAWA.
- Take appropriate action in response to an incident or incidents of domestic violence, dating violence, or stalking, affecting families or individuals assisted by TMHA.
- Train TMHA staff on the confidentiality issues as required by VAWA.
- Allow for the transfer of families who are victims of domestic violence.



## **Smoke Free Policy**

(See attachment oh008d01)

## **Pet Policy**

The Trumbull Metropolitan Housing Authority has adopted a Pet Policy as required by HUD. The Pet Policy provides residents with guidelines for the upkeep of pets on Housing Authority property. The guidelines establish deposits, type and number of pets allowed and other appropriate requirements. The Pet Policy is required to ensure that the safety of residents and sanitary conditions of the housing is not affected by pets. The complete Pet Policy is on file at the Housing Authority's main office and each applicant is made aware of the Policy during the application process. This policy includes language that waives the deposit for medically authorized assist or companion animals.

## **Substantial Deviation/Significant Amendment or Modification**

### **Substantial Deviation**

- Additions or deletions of Strategic Goals
- Any deviation that requires reviews and input by the Resident Advisory Board as well as approval by the Board of Commissioners.

### **Significant Amendment/Modification**

- Any change to rent or admissions policies or organization of the waiting list;
- Change in use of replacement reserve funds (if applicable) under the Capital Fund Program;
- Additions of any non-emergency\* public housing CFP work items exceeding 25% of the Agency's overall Annual CFP budget (items not included in the current Capital Fund Annual Statement or 5-Year Action Plan); and
- Any change with regard to a proposed demolition, disposition, designation of housing, homeownership programs, Capital Fund Financing, development, or mixed financing proposals, RAD, or any other conversion activities are considered significant amendments to the CFP 5-Year Action Plan.

An exception to this definition will be made for any of the above that are adopted to reflect changes in HUD regulatory requirements since such changes are not considered significant.

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This criterion does not supersede the requirements of 2 CFR Part 200 (Administrative Requirements for Grants and Cooperative Agreements), as well as federal, state, or local regulations or statutes.

Any future issuance of HUD guidelines or additional regulations shall take precedence over the above criterion.

\* Emergency – means physical work items of an emergency nature, posing an immediate threat to the health and safety of residents or staff, which must be completed within one year of capital grant funding. Management improvements are not eligible as emergency work.

### **New Activities**

Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?

- Hope VI or Choice Neighborhoods**
- Mixed Finance Modernization or Development**
- Demolition and/or Disposition**
- Conversion of Public Housing to Tenant Based Assistance**
- Conversion of Public Housing to Project Based Assistance under RAD**
- Project Based Vouchers**
- Units with Approved Vacancies for Modernization**
- Other Capital Grant Programs**

### **Hope VI or Choice Neighborhoods**

TMHA has not received a HOPE VI revitalization grant.

TMHA does not plan to apply for a HOPE VI Revitalization grant in the Plan year.

### **Mixed Finance Modernization or Development**

TMHA has completed mixed-finance development activities for public housing.

TMHA may be conducting other public housing development or replacement activities not discussed in the Capital Fund Program Annual Statement.

TMHA may develop or replace public housing units with funds made available via other affordable housing programs such as NSP, LIHTC, CN and RAD. These activities will comply with all applicable HUD regulations.

## **Demolition and/or Disposition**

TMHA plans to conduct demolition or disposition activities in the plan Fiscal Year.

<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Tod Riverview Apartments</b> 1b. Development (project) number: <b>OH008-005</b>
2. Activity type: <b>Demolition</b> <input checked="" type="checkbox"/> Disposition <input type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> <b><i>Planned application</i></b> <input checked="" type="checkbox"/>
4. Date application approved, submitted, or <b><i>planned</i></b> for submission: <b><u>06/2021</u></b>
5. Number of units affected: <b>1</b> 6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: <b><u>07/01/2022</u></b> b. Projected end date of activity: <b><u>07/02/2023</u></b>

## **Conversion of Public Housing to Tenant Based Assistance**

TMHA does not plan to convert any Public Housing to Tenant Based Assistance.

## **Conversion of Public Housing to Project-Based Assistance under RAD**

TMHA has been exploring options for conversion to Public Housing portfolio to Project-Based Rental Assistance under RAD.

## **Occupancy of Over-Income Families**

Significant Amendment to the PHA Plan: Public Housing Income Limit

Section 103 of the Housing Through Modernization Act of 2016 (HOTMA) amends section 16(a) of the United States Housing Act of 1937 (42 U.S.C. 1437n(a) to place an income limitation on public housing tenancy for families. The law requires the PHA to terminate assistance of over-income families.

After a family's income has exceeded 120% of the area median income (AMI) (or a different limitation established by the Secretary) for two consecutive years, the PHA must terminate the family's tenancy within 6 months of the second income determination or charge the family a monthly rent equal to the greater of (1) the applicable Fair Market Rent, or (2) the amount of monthly subsidy for the unit including amounts from the operating and capital fund, as determined by regulations.

### **Project-based Vouchers**

TMHA may utilize PBVs to expand housing opportunities within its jurisdiction.

### **Units with Approved Vacancies for Modernization N/A**

**Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

*TMHA will access and apply as appropriate.*

**Civil Rights Certification:** Form HUD-50077, PHA Certifications of Compliance with the PHA and Related Regulation, must be submitted by the PHA as an electronic attachment to the PHA Plan.

### **Progress Report**

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

### **Mission**

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

### **Goals/Objectives**

#### **PHA GOAL #1: EXPAND THE SUPPLY OF ASSISTED HOUSING**

TMHA established the following objectives to strive in meeting goal #1:

- Apply for additional rental vouchers
- Reduce public housing vacancies

- Leverage private or other public funds to create additional housing opportunities
- Acquire or build units or developments

**Progress Statement:**

- ***TMHA was awarded Foster Youth Vouchers, as needed***
- ***Reducing PH vacancies are still on track***

**PHA GOAL #2: IMPROVE THE QUALITY OF ASSISTED HOUSING**

TMHA established the following objectives to strive in meeting goal #2:

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

**Progress Statement:**

- ***Purchased land for additional parking at sites, as needed and available***
- ***PHAS – still High Performer***
- ***Trumbull Homes – unit drywall ceiling replacements and repairs to failing sanitary sewer systems***
- ***Wick St. Homes – tree removal***
- ***Rio Terra – parking lot asphalt mill and replace***
- ***Reo Blvd Homes – site drainage upgrades***
- ***Riverview Buckeye – roof replacement, retaining wall repair and elevator repair***
- ***Hilltop Gardens – concrete replacement, repair of slumping hillside and site drainage improvements and parking lot asphalt mill and replace***
- ***Valley West – exterior enhancements including windows, roof, siding, lighting and unit kitchen bath and common area renovations***
- ***McKinley Towers – sprinkler system upgrades and concrete replacement***
- ***Northview – unit kitchen, bath and common area renovations, new tenant entry doors including electronic access control installation and sprinkler system upgrades***

### **PHA GOAL #3: INCREASE ASSISTED HOUSING CHOICES**

TMHA established the following objectives to strive in meeting goal #3

- Provide voucher mobility counseling
- Conduct outreach efforts to potential voucher landlords
- Increase voucher payment standards
- Implement voucher homeownership program
- Implement public housing or other homeownership programs
- Implement public housing site-based waiting lists
- Convert public housing to vouchers
- Apply for new program vouchers available through HUD or other housing agencies

**Progress Statement: *Foster Youth Vouchers were awarded.***

### **PHA GOAL #4: PROVIDE AN IMPROVED LIVING ENVIRONMENT**

TMHA established the following objectives to strive in meeting goal #4

- Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments
- Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments
- Implement public housing security improvements
- Designate developments or buildings for particular resident groups (elderly, persons with disabilities)

**Progress Statement:**

- *PH sites have a working preference*
- *Camera and DVD upgrades*

### **PHA GOAL #5: PROMOTE SELF-SUFFICIENCY AND ASSET DEVELOPMENT OF ASSISTED HOUSEHOLDS**

TMHA established the following objectives to strive in meeting goal #5

- Increase the number and percentage of employed persons in assisted families
- Provide or attract supportive services to improve assistance recipients' employability
- Provide or attract supportive services to increase independence for the elderly or families with disabilities

**Progress Statement:**

- ***Participate in FSS Program***
- ***Service Coordinator – ROSS Grant***

**PHA GOAL #6: ENSURE EQUAL OPPORTUNITY AND AFFIRMATIVELY  
FURTHER FAIR HOUSING**

TMHA established the following objectives to strive in meeting goal #6

- Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability
- Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status and disability
- Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required

**Progress Statement:**

- ***Continuous fair housing training***
- ***Continuous review of policies and plans***

**Most Recent Fiscal Year Audit**

(a) Were there any findings in the most recent FY Audit?

Y N

If, yes, please describe: ***N/A***

**Resident Advisory Board (RAB) Comments**

Did the RAB(s) provide comments to the PHA Plan?

Y N

Please provide comments received and the PHA's response to each comment (***see attachment oh008a01***).

**Certification by State or 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.

**Statement of Capital Improvements.** Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).

- 1) Capital Improvements. Include a reference here to the most recent HUD approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.

***See HUD Form 50075.2 approved by HUD on 10/08/2020.***

**Challenged Elements** – No Challenged Elements



Attachment: oh008d01  
Trumbull Metropolitan Housing Authority  
Smoke Free Policy – Public Housing

## TRUMBULL METROPOLITAN HOUSING AUTHORITY

### SMOKE FREE POLICY – PUBLIC HOUSING (PIH2017-03)

EFFECTIVE DATE JULY 30, 2018

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**PURPOSE** – This policy is about the health and wellness of residents. TMHA and HUD are committed to providing healthy housing for all. Homes with secondhand smoke are not healthy and they are not safe. The policy and enforcement will be about the smoke and not the smoker.

#### DEFINITIONS

- Prohibited tobacco products – items that involve the ignition and burning of tobacco leaves
- All lit tobacco products (e.g., cigarettes, pipes, cigars, etc.)
- Water pipe tobacco smoking (i.e., hookahs)
- Smoking
- Premises
- Interior common areas includes, but are not limited to, hallways, rental and administrative offices, community centers, day care centers, laundry centers, and similar structures
- Individual Units – interior and exterior spaces tied to a particular multi-family or single family dwelling unit. This includes, but is not limited to, bedrooms, hallways, kitchens, bathrooms, patios, balconies, and unit entryway areas.

#### SMOKE FREE AREAS

- All public housing living units
- Interior common areas
- Balconies, porches, and attached structures if they are part of the building
- Outdoor areas within 25 feet of the housing or building (restricted areas)
- Smoking is permitted in personal vehicles, as long as the vehicle is at least 25 feet from the building

**DISCLAIMER** – TMHA is not acting as a guarantor of the policy, however, TMHA will take reasonable steps to enforce the Smoke-Free Policy. Failure to enforce any part of a smoke-free policy does not negate the right to enforce it in the future.

**All applicants, residents, guests, staff members, and business visitors must comply with this policy.**

**ENFORCEMENT by TMHA**

- 1<sup>st</sup> Violation – Written warning; Copy of Smoke-Free Policy; Referral to cessation services
- 2<sup>nd</sup> Violation – Written warning #2; Referral to cessation services
- 3<sup>rd</sup> Violation – Written warning #3; Private Conference with Manager; Referral to cessation services
- 4<sup>th</sup> Violation – Final writing warning; Private conference with manager (resident will be informed that further violations could constitute legal action)
- Eviction – If TMHA receives more than four validated infractions, eviction proceedings may begin. This process includes an informal meeting, formal hearing, and court.
- Posting of warning signs
- Consistently enforcing the policy
- Sign the smoke-free lease addendum

**Responsibilities of the Tenant**

- Notify guests and visitors, or other persons under the resident's control
- Report violations
- Sign the smoke-free lease addendum

\*\* A resident can bring a claim directly against another resident based on secondhand smoke intrusion. A nonsmoking resident could get a court order requiring that the smoking resident stop the smoke infiltration or the resident could potentially recover monetary damages.\*\*

**Reasonable Accommodation Requests** – Addiction to nicotine or smoking is not a disability. TMHA may not permit continued smoking in a restricted area. TMHA will provide reasonable accommodations that are in compliance with the requirements of TMHA Smoke-Free Housing Policy to persons with disabilities who smoke and where there is an identifiable relationship between the requested accommodation and the individual's disability. All requests will be evaluated on a case-by-case basis.

Electronic Nicotine Delivery Systems (ENDS) are permitted in resident units, but are NOT permitted in any common area in the building.

TMHA will have a Designated Smoking Area (DSA) at least 25 feet from the building

- The area will be accessible in accordance with section 504 of the Rehabilitation Act
- The DSA will be shaded and/or covered
- The DSA will contain seating