

PHA Plans for the Trumbull Metropolitan Housing Authority Annual Plan for FYB 2021

Donald W. Emerson Jr., Executive Director

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FIRST DRAFT



Presented by:

The **Nelrod** Company

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A.1 Availability of Information. PHAs must have the elements listed below in sections B and C 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. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

The following are the specific locations where the public may obtain copies of the 2021 Annual PHA 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 PHA Plan and complete table below)

Participating PHAs	PHA Code	Program(s) in the Consortia	Programs Not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead HA:					

B Annual Plan Elements

B.1 Revision of PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA since its last **Annual PHA 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.
 - Homeownership Programs.
 - Safety and Crime Prevention.
 - Pet Policy.
 - Substantial Deviation.
 - Significant Amendment/Modification

(b) The PHA must submit its Deconcentration Policy for Field Office Review (*See attachment oh008b01*).

(c) If the PHA answered yes for any element, describe the revisions for each element below:

Statement of Housing Needs and Strategy for Addressing Housing Needs

Statement of Housing Needs:

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

Waiting List for Public Housing:

Total: 283 – annual turnover of 242
Extremely Low Income: 261-92%
Very Low Income: 15-5%
Low Income: 5-2%
Families with children: 131-46%

B.1

Elderly families: 30-11%
Families with Disabilities: 51-18%
White: 175-62%
Black/African American: 105-37%
American Indian/Alaska Native: 1-0.4%
Asian: 1-0.4%
Hispanic: 1-0.4%

Bedrooms:
1 BR: 117-41%
2 BR: 88-31%
3 BR: 59-21%
4 BR: 11-4%
5 BR: 8-3%

The waiting list is not closed.

Waiting List for Section 8

Total: 119
Extremely Low Income: 109-92%
Very Low Income: 10-8%
Families with children: 83-70%
Elderly families: 2-2%
Families with Disabilities: 14-12%
White: 27-23%
Black/African American: 92-77%
Hispanic: 2-2%

The waiting has been closed for 28 months and the PHA does not expect to reopen in PHA Plan year.

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions

Public Housing

Eligibility:

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*

B.1 *TMHA added "Resident Check" to the above.*

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

Preferences:

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*

TMHA added Foster Youth to Independence.

Financial Resources:		
Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2021 grants)		
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
2. Prior Year Federal Grants (unobligated funds only) (list below)		
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
3. Public Housing Dwelling Rental Income	2,155,100.00	Public housing operations
4. Other income (list below)		
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
5. Non-federal sources (list below)		
Total resources	\$20,385,147.00	

B.2 New Activities.

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

Y N

- 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 (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA

Mixed Finance Modernization or Development

TMHA may be conducting other public housing developments 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.

B.2 Demolition/Disposition Activity Description

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

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

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.

Project-Based Vouchers

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

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

TMHA will access and apply as appropriate.

B.3 Progress Report.

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

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

B.3

- 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
- Concentration 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

B.3

- 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

B.3	<p><u>Progress Statement:</u></p> <ul style="list-style-type: none"> ▪ <i>Continuous fair housing training</i> ▪ <i>Continuous review of policies and plans</i>
B.4	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe: <i>N/A</i></p>
C.	Other Document and/or Certification Requirements.
C.1	<p>Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan</p> <p><i>Form 50077-ST-HCV-HP, Certification of Compliance with PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan.</i></p>
C.2	<p>Civil Rights Certification.</p> <p><i>Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan.</i></p>
C.3	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide 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. <i>(See attachment oh008a01)</i></p>
C.4	<p>Certification by State or Local Officials.</p> <p><i>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.</i></p>
D.	Statement of Capital Improvements. Required for all PHAs completing this form that administers public housing and receive funding from the Capital Fund Program (CFP).
D.1	<p>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.</p> <p><i>See HUD Form 50075.2 approved by HUD on 10/08/2020.</i></p>
	Challenged Elements. No Challenged Elements

Attachment: oh008a01
Trumbull Metropolitan Housing Authority
Resident Advisory Board Consultation Process and Comments – FYB 2021

1. Resident notification of appointment to the Advisory Board

At beginning of PHA Plan process, sent out letter to all residents/participants of opportunity to serve on Resident Advisory Board
Please provide date

2. Resident Advisory Board Selection

Selection made from resident/participant response **Please provide date**

3. Meeting Organization

Schedule date to meet with Resident Advisory Board for input to PHA Plan
Please provide date

Notify Resident Advisory Board of scheduled meeting **Please provide date**

Hold Resident Advisory Board meeting **March 2021 via phone**

4. Notification of Public Hearing

Schedule date for Public Hearing and place ad **Please provide date**

Notify Resident Advisory Board **Please provide date**

Hold Public Hearing meeting **Please provide date**

5. Documentation of resident recommendations and PHA's response to recommendations

Please provide the residents' recommendations/comments and the PHA response to each comment after each RAB meeting.

Attachment: oh008b01
Trumbull Metropolitan Housing Authority
Deconcentration Policy

DECONCENTRATION POLICY

INTRODUCTION

The Quality Housing and Work Responsibility Act of 1998 (QHWRA) requires that the Housing Authority adopt policies and procedures governing the deconcentration of poverty and income mixing as required by section 10(a)(3)(B) of the 1937 Housing Act. It is the Housing Authority's (HA) policy to provide for deconcentration of poverty and encourage income mixing.

The goal of this policy is lessen the concentration of poverty and to create mixed-income communities and within the HA's public housing developments. This will be accomplished through admissions practices designed to bring in higher income residents to lower income developments and lower income residents into higher income developments. Toward this end, HA will skip families on the waiting list to reach other families with a lower or higher income. We will accomplish this in a uniform and non-discriminating manner.

The Deconcentration Policy is intended to work in conjunction with the Authority's annual income targeting requirements. The QHWRA requires that 40 percent of all new admissions to public housing developments during a fiscal year must be residents whose household income, at the time of admission, is equal to or lower than 30 percent of the Area Median Income. This "income targeting" requirement is separate from the Deconcentration Policy, which is comparative in nature.

The HA will affirmatively market housing to all eligible income groups. Lower income residents will not be steered toward lower income developments and higher income people will not be steered toward higher income developments.

II. DEFINITIONS

The following definitions are provided in order to clearly and define the affected developments and families under this Deconcentration Policy. **A final rule was published at 24 CFR 903 on August 6, 2002, amending the definition of “Established Income Range” and that change is reflected in this revised policy.**

Covered Developments: Public housing developments that are of general occupancy or family public housing developments that are not exempt from the deconcentration requirement.

Exempt Developments: Public housing developments that are operated by housing authorities with fewer than 100 units; public housing developments that house only elderly persons or persons with disabilities, or both; public housing developments operated by housing authorities that operate only one general occupancy development; public housing developments approved for demolition or conversion to tenant-based assistance; and public housing developments that include units operated in accordance with a HUD-approved mixed-finance plan using HOPE VI or public housing funds awarded before the effective date of the Deconcentration Final Rule.

PHA-Wide Established Income Range: **The average annual household income of all residents of all covered developments is the PHA-Wide Established Income Range (EIR).**

Development Average Household Income: The average annual household income of all residents of a specific covered development.

Developments Outside the PHA-Wide Established Income Range: A development where the Average Household Income is between 85 percent and 115 percent of the PHA-Wide EIR is considered to be within the PHA-Wide EIR. If the average household income in a development is less than 85% of the EIR or greater than 115% of the EIR, the development is considered to be outside the PHA-Wide EIR **with the following exception:**

A covered development with an average household income exceeding 115% of the PHA-Wide EIR shall not be considered outside the PHA-Wide EIR if the upper limit that exceeds 115% of EIR is less than 30 per cent of area median income. **(24 CFR 5.603(b)).**

III. ANALYSIS

In order to achieve and maintain deconcentration, the HA will comply with the following:

- a) Determine the PHA-Wide Established Income Range for all covered developments at least an annual basis.

- b) Determine the average household income for each covered development.
- c) Determine whether each covered development falls above, within, or below the established income range, **except that the upper limit shall never be less than 30 per cent of the median area income limit.**
- d) Determine, for those developments having average incomes outside the established income range, if there are factors to explain and/or justify the income profile as being consistent with and furthering two sets of goals: the goals of deconcentration and income mixing as specified by the statute; and the local goals and strategies contained in the HA Annual Plan.
- e) Where the income profile for a covered development is not explained and/or justified in the HA Annual Plan a specific policy to provide for deconcentration and income mixing in applicable covered developments.

Analysis will be completed at least annually, but may be accomplished more frequently to determine the effectiveness of various initiatives employed to achieve deconcentration.

IV. ACTION PLAN

If a covered development has been identified as falling above or below the established income range, the HA will define and communicate specific procedures to be employed with the goal of achieving deconcentration. It is the goal of the HA to generally increase the level of income for residents of public housing, create more stratified developments, and obtain agency self sufficiency, therefore; the Deconcentration Policy shall not be employed to be counterproductive to that goal. In addition, the policy will, under no circumstances, be employed through steering or in any way reducing the choice in residence of the individual family.

In order to deconcentrate a development, the HA will contact the first family on the waiting list who has the highest priority for this type of unit or development and whose income category would help to meet the deconcentration goal and/or the income-targeting goal. To the greatest extent possible, the HA will provide incentives to encourage families with incomes below the established income range to accept units in developments with incomes above the established income range or to encourage families with incomes above the established income range to accept units in developments with incomes below the established income range.

The HA may offer one or more incentives to encourage applicant families whose income classification would help to meet the deconcentration goals of a particular development. Various incentives may be used at different times, or under different conditions, but will always be provided in a consistent and nondiscriminatory manner. These may include but are not limited to:

- a) Rent Incentives to select particular developments.
- b) Payment Plans for deposits.
- c) Flexibility in move-in dates.

A family has the sole discretion whether to accept an offer of a unit made under the HA's deconcentration policy. HA shall not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the deconcentration policy.

**Attachment oh008c01
Occupancy Data for Site-Based Waiting Lists**

Occupancy Data for Site-Based Waiting Lists								
Site	White	Black	Indian	Asian	Pacific Islander	Other	Hispanic	Not Hispanic
Trumbull Homes/Fairview	<i>45</i>	<i>39</i>	0	0	0	<i>0</i>	<i>1</i>	<i>82</i>
Highland Terrace/Warren Scattered Sites	<i>22</i>	<i>21</i>	<i>0</i>	0	0	0	<i>1</i>	<i>44</i>
Riverview/Tod/ Buckeye	<i>10</i>	<i>3</i>	0	<i>0</i>	0	<i>0</i>	<i>0</i>	<i>13</i>
McKinley Towers	<i>16</i>	<i>3</i>	0	<i>0</i>	0	<i>0</i>	<i>0</i>	<i>19</i>
Hubbard Manor	<i>4</i>	<i>1</i>	0	0	0	0	0	5
Rio Terra	<i>13</i>	<i>5</i>	0	<i>1</i>	0	0	0	<i>13</i>
Northview	13	<i>2</i>	0	0	0	0	0	<i>15</i>
Girard Scattered Sites	<i>25</i>	8	0	0	0	<i>2</i>	1	<i>25</i>
Eastview	<i>18</i>	3	<i>0</i>	0	0	0	0	<i>21</i>
Hilltop Gardens	<i>16</i>	<i>0</i>	0	0	0	0	<i>0</i>	<i>16</i>
Valley West	<i>1</i>	<i>1</i>	0	0	0	0	0	<i>2</i>

Stats as of 01/13/2021