

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

Trumbull Metropolitan Housing Authority

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

A. PHA Information

PHA Name: Trumbull Metropolitan Housing Authority

PHA Code: OH008

PHA Type: High Performer

PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/2022

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

Number of Public Housing (PH) Units: 1249

Number of Housing Choice Vouchers (HCVs): 1086

Total Combined 2335

PHA Plan Submission Type: Annual Submission
 Revised Annual Submission

The following are the specific locations where the public may obtain copies of the 2022 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:					

B.1 Revision of Existing PHA Plan Elements.

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

- 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) If the PHA answered yes for any elements, 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	11,335	5	5	5	3	3	3
Income >30% but <=50% of AMI	10,225	4	4	4	3	3	3
Income >50% but <80% of AMI	15,700	3	3	3	3	3	3
Elderly	46,634	4	3	3	4	3	3
Families with Disabilities	21,006	3	3	3	5	3	3
White	176,548	3	3	3	3	3	3
Black/African American	17,370	3	3	3	3	3	3
Hispanic	3,838	3	3	3	3	3	3

Housing Needs of Families on the Waiting List			
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	1089		274
Extremely low income <=30% AMI	933	86%	
Very low income (>30% but <=50% AMI)	86	8%	
Low income (>50% but <80% AMI)	55	5%	
Families with children	679	62%	
Elderly families	40	4%	
Families with Disabilities	265	24%	
White	595	55%	
Black/African American	378	35%	
American Indian/Alaska Native	8	1%	
Asian	4	0.37%	
Native Hawaiian/Other Pacific Islander	55	5%	
Hispanic	49	4%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	380	35%	
2 BR	348	32%	
3 BR	264	24%	
4 BR	58	5%	
5 BR	39	4%	
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)? <i>N/A</i>			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes <i>N/A</i>			
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			

Housing Needs of Families on the Waiting List			
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	115		
Extremely low income <=30% AMI	101	88%	
Very low income (>30% but <=50% AMI)	13	11%	
Low income (>50% but <80% AMI)	1	1%	
Families with children	64	56%	
Elderly families	6	5%	
Families with Disabilities	21	18%	
White	42	37%	
Black/African American	73	63%	
American Indian/Alaska Native	0	0%	
Asian	0	0%	
Native Hawaiian/Other Pacific Islander	0	0%	
Hispanic	3	3%	
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)? 5			
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:

- Adopt 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:

- Carry 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 on 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
- ***Resident Check***

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:

- 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 ***online by visiting: www.trumbulltmha.org***

If online assistance is needed, applicant can schedule appointment with the Housing Services Administrator at the main administrative office located at 4076 Youngstown Rd., SE, Suite 101.

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 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 an average income that falls 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 published notices.

Financial Resources

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2022 grants)		
a) Public Housing Operating Fund	4,828,402.00	
b) Public Housing Capital Fund	5,696,300.00	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	5,576,046.00	
f) Resident Opportunity and Self-Sufficiency Grants	74,800.00	
g) Community Development Block Grant		
h) HOME		
Other Federal Grants (list below)		
Annual Contributions for Section 8 Administrative Fees	881,700.00	
FSS Program	119,100.00	
2. Prior Year Federal Grants (unobligated funds only) (list below)		
OH12P00850119	41,872.00	
OH12P00850120	2,325,690.00	
OH12P00850121	2,769,328.00	
3. Public Housing Dwelling Rental Income		
4. Other income (list below)		
Interest on Investments	38,000.00	
Other Tenant Income	178,900.00	
Non-Dwelling Rent & Other Income	46,000.00	
Other Income	12,000.00	
5. Non-federal sources (list below)		
Total resources	\$24,560,636.00	

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

The PHA selected these standards because it reflects market or submarket.

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 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 the 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.

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.

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

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. 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. Once the Tod Riverview Apartments are approved for demolished and the demolition is completed, the TMHA will offer TMHA residents a Tenant Prevention Voucher.

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: <u>07/01/2022</u>
5. Number of units affected: 152 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: <u>07/01/2022</u> b. Projected end date of activity: <u>12/31/2023</u>

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 Assistance under RAD.

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 assess and apply as appropriate.

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:

- ***VASH Vouchers: 35 total of 12/31/2021***
- ***Reduced PHA vacant units, long term vacant units***
- ***Streamlined screening process, reduced turnaround time, May 2021***
- ***Implemented online application process September 2021, all 11 PHA wait lists***
- ***Housing Services Administrator face to face meeting with area agencies to promote awareness around housing opportunities, June 2021***
- ***Improved PH occupancy***

- ***Veteran's Haven Program, HUD approved 5 units at 803/805, effective 3/16/2021, providing shelter to homeless veterans through the VA***

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:

- ***PHAS- still a high performer***
- ***HCVP Inspector hired, from 1 to 2 effective November 2021***
- ***Renovate or modernize public housing units:***
 - ***Unit drywall ceiling replacement***
 - ***Repairs to failing water lines, storm and sanitary sewer systems***
 - ***Parking lot repairs***
 - ***Exterior building renovations***
 - ***Fire alarm replacement***
 - ***Elevator modernization***
 - ***Exterior enhancements including windows, roof, siding, lighting***
 - ***Unit kitchen, bath and common area renovations***
 - ***Boiler replacement***
 - ***New tenant entry doors including electronic access control installation***

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.***
- ***Conducted outreach efforts to potential new landlords***
- ***Waiting list was opened July 19th thru 23rd***

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***
- ***Response to measures ensuring safety of Public Housing residents by means of the following:***
 - ***Consistent police patrols during high traffic hours***
 - ***Security Coordinator conducts "lighting survey" ensuring lighting replacement is a priority***
 - ***Coordinated effort between TMHA and Local Law Enforcement, Police reports and activities reviewed daily***
 - ***Increased technology: Cameras and DVDs have been upgraded to enhance the ability to react and take decisive measures***
 - ***Veteran's Haven Program, HUD approved 5 units at 803/805, effective 3/16/21, providing shelter to homeless veterans through the VA***

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:

- *FSS number of participating families increased from 2020 – 2021 despite all offices being closed to public due to COVID issues, 63 households participating*
- *Promote scholarship opportunities for all eligible residents, increasing access to education*
- *Continue to work closely with local service providers to ensure access to resources for families*
- *Home Ownership Program: 1 closed in December 2021*
- *Preference on waiting list for working families*
- *Service Coordinator – ROSS Grant*
- *Service Coordinator – stationed at elderly/disabled sites for supportive services*

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:

- ***Fair Housing Staff training held July 29, 2021***
- ***Fair Housing Coach Newsletters***
- ***Continuous review of policies and plans***

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) in EPIC and the date that it was approved.

See Capital Fund 5 Year Action Plan in EPIC approved by HUD on 10/08/2020

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.

Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.

Form 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.

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.

(a) Did the public challenge any elements of the Plan?

Y	N
<input type="checkbox"/>	<input type="checkbox"/>

If yes, include Challenged Elements.

Affirmatively Furthering Fair Housing (AFFH).

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.

Fair Housing Goal: Describe fair housing strategies and actions to achieve the goal:

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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

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

- 1st Violation – Written warning; Copy of Smoke-Free Policy; Referral to cessation services
- 2nd Violation – Written warning #2; Referral to cessation services
- 3rd Violation – Written warning #3; Private Conference with Manager; Referral to cessation services
- 4th 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