

<b>Streamlined Annual PHA Plan (High Performer PHAs)</b>	<b>U.S. Department of Housing and Urban Development Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226 Expires 03/31/2024</b>
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low-income, very low-income, and extremely low-income families.

**Applicability.** Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

**Definitions.**

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

**A PHA Information.**

**A.1** 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 Annual Contributions Contract (ACC) units at time of FY beginning above)  
 Number of Public Housing (PH) Units: 1249  
 Number of Housing Choice Voucher (HCVs): 1086  
 Total Combined Units/Vouchers: 2335  
 PHA Submission Type:  Annual Submission  Revised Annual Submission

**A.1 Availability of Information.** In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at 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 2022 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 Plan Elements**

**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?

- 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) 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:**

<b>Housing Needs of Families in the Jurisdiction by Family Type</b>							
<b>Family Type</b>	Overall	Affordability	Supply	Quality	Accessibility	Size	Location
Income <= 30% of AMI	<b>11,335</b>	5	5	5	3	3	3
Income >30% but <=50% of AMI	<b>10,225</b>	4	4	4	3	3	3
Income >50% but <80% of AMI	<b>15,700</b>	3	3	3	3	3	3
Elderly	<b>46,634</b>	4	3	3	4	3	3
Families with Disabilities	<b>21,006</b>	3	3	3	5	3	3
White	<b>176,548</b>	3	3	3	3	3	3
Black/African American	<b>17,370</b>	3	3	3	3	3	3
Hispanic	<b>3,838</b>	3	3	3	3	3	3

**B.1**

**Waiting List for Public Housing:**

*Total: 1,089 with annual turnover of 274*  
*Extremely Low Income: 933-86%*  
*Very Low Income: 86-8%*  
*Low Income: 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%*

***Bedrooms:***

*1 BR: 380-35%*  
*2 BR: 348-32%*  
*3 BR: 264-24%*  
*4 BR: 58-5%*  
*5 BR: 39-4%*

*The waiting list is not closed.*

**Waiting List for Section 8**

*Total: 115*  
*Extremely Low Income: 101-88%*  
*Very Low Income: 13-11%*  
*Low Income: 1-1%*  
*Families with children: 64-56%*  
*Elderly families: 6-5%*  
*Families with Disabilities: 21-18%*  
*White: 42-37%*  
*Black/African American: 73-63%*  
*Hispanic: 3-3%*

*The waiting list has been closed for 5 months. The PHA does not expect to reopen the list in the PHA Plan year.*

**B.1**

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

### **Public Housing**

#### **Eligibility:**

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*

*TMHA added “Resident Check” to non-income screening factors above.*

#### **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](http://www.trumbulltmha.org)*.

*TMHA changed the statement above and deleted “at the main administrative office located at 4076 Youngstown Rd., SE, Suite 101 and the development site management offices listed”.*

*TMHA added:*

*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).*

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 development with site-based waiting lists
- At the development to which they would like to apply

*TMHA deleted from the statement above “and sign up to be on”.*

**B.1 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.*

**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 2022 grants)</b>		
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	
<b>2. Prior Year Federal Grants (unobligated funds only) (list below)</b>		
OH12P00850119	41,872.00	
OH12P00850120	2,325,690.00	
OH12P00850121	2,769,328.00	
<b>3. Public Housing Dwelling Rental Income</b>	1,972,498.00	
<b>4. Other income (list below)</b>		
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	
<b>5. Non-federal sources (list below)</b>		
<b>Total resources</b>	<b>\$24,560,636.00</b>	

<b>B.1</b>	c) The PHA must submit its Deconcentration Policy for Field Office Review ( <i>See attachment oh008b01</i> ).
<b>B.2</b>	<p><b>New Activities.</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?</p> <p>Y    N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(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</p> <p><b>Mixed Finance Modernization or Development</b></p> <p>TMHA may be conducting other public housing development or replacement activities not discussed in the Capital Fund Program Annual Statement.</p> <p>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.</p> <p><b>Demolition/Disposition Activity Description</b></p> <p>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.</p>

**B.2**

<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>Planned application</b> <input checked="" type="checkbox"/>	
4. Date application approved, submitted, or <b>planned</b> for submission: <u>07/01/2022</u>	
5. Number of units affected: <b>152</b>	
6. Coverage of action (select one)	
<input type="checkbox"/> Part of the development	
<input checked="" type="checkbox"/> <b>Total development</b>	
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 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.

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

TMHA will assess 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 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
- Acquire or build units or developments



**B.3**

**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 PHA 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

**B.3**

- 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 services to increase independence for the elderly or families with disabilities

<p><b>B.3</b></p>	<p><b><u>Progress Statement:</u></b></p> <ul style="list-style-type: none"> <li>▪ <i>FSS number of participating families increased from 2020 – 2021 despite all offices being closed to public due to COVID issues, 63 households participating</i></li> <li>▪ <i>Promote scholarship opportunities for all eligible residents, increasing access to education</i></li> <li>▪ <i>Continue to work closely with local service providers to ensure access to resources for families</i></li> <li>▪ <i>Home Ownership Program: 1 closed in December 2021</i></li> <li>▪ <i>Preference on waiting list for working families</i></li> <li>▪ <i>Service Coordinator – ROSS Grant</i></li> <li>▪ <i>Service Coordinator – stationed at elderly/disabled sites for supportive services</i></li> </ul> <p><b>PHA GOAL #6: ENSURE EQUAL OPPORTUNITY AND AFFIRMATIVELY FURTHER FAIR HOUSING</b></p> <p>TMHA established the following objectives to strive in meeting goal #6</p> <ul style="list-style-type: none"> <li>▪ Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status and disability</li> <li>▪ 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</li> <li>▪ Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required</li> </ul> <p><b><u>Progress Statement:</u></b></p> <ul style="list-style-type: none"> <li>▪ <i>Fair Housing Staff training held July 29, 2021</i></li> <li>▪ <i>Fair Housing Coach Newsletters</i></li> <li>▪ <i>Continuous review of policies and plans</i></li> </ul>
<p><b>B.4</b></p>	<p><b>Capital Improvements.</b> 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.</p> <p><i>See Capital Fund 5 Year Action Plan in EPIC approved by HUD on <u>10/08/2020</u></i></p>
<p><b>B.5</b></p>	<p><b>Most Recent Fiscal Year Audit.</b></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>

<b>C.</b>	<b>Other Document and/or Certification Requirements.</b>
<b>C.1</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p><b>(a) Did the RAB(s) provide comments to the PHA Plan?</b></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>
<b>C.2</b>	<p><b>Certification by State or Local Officials.</b></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>
<b>C.3</b>	<p><b>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p><i>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.</i></p>
<b>C.4</b>	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.</p> <p><b>(a) Did the public challenge any elements of the Plan?</b></p> <p>Y N  <input type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
<b>D.</b>	<b>Affirmatively Furthering Fair Housing (AFFH).</b>
<b>D.1</b>	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p> <p>Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p>

<b>D.1</b>	<p><b>Fair Housing Goal:</b> Describe fair housing strategies and actions to achieve the goal:</p> <p><b>Fair Housing Goal:</b> Describe fair housing strategies and actions to achieve the goal:</p> <p><b>Fair Housing Goal:</b> Describe fair housing strategies and actions to achieve the goal:</p>
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**Attachment: oh008a01**  
**Trumbull Metropolitan Housing Authority**  
**Resident Advisory Board Consultation Process and Comments – FYB 2022**

1. Meeting Organization

Notify Resident Advisory Board of scheduled meeting **February 22, 2022**

Hold Resident Advisory Board meeting **March 9, 2022**

2. Notification of Public Hearing

Schedule date for Public Hearing and place ad **January 10, 2022**

Hold Public Hearing meeting **March 8, 2022**

3. 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**

<b>Occupancy Data for Site-Based Waiting Lists</b>								
<b>Site</b>	<b>White</b>	<b>Black</b>	<b>Indian</b>	<b>Asian</b>	<b>Pacific Islander</b>	<b>Other</b>	<b>Hispanic</b>	<b>Not Hispanic</b>
Trumbull Homes/Fairview	<i>165</i>	<i>140</i>	<i>2</i>	<i>2</i>	<i>2</i>	<i>6</i>	<i>15</i>	<i>302</i>
Highland Terrace/Warren Scattered Sites	<i>89</i>	<i>70</i>	<i>0</i>	<i>1</i>	<i>2</i>	<i>3</i>	<i>12</i>	<i>153</i>
Riverview/Tod/ Buckeye	<i>14</i>	<i>8</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>22</i>
McKinley Towers	<i>53</i>	<i>18</i>	<i>2</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>1</i>	<i>72</i>
Hubbard Manor	<i>27</i>	<i>9</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>36</i>
Rio Terra	<i>66</i>	<i>42</i>	<i>1</i>	<i>1</i>	<i>0</i>	<i>1</i>	<i>4</i>	<i>107</i>
Northview	<i>30</i>	<i>7</i>	<i>1</i>	<i>0</i>	<i>1</i>	<i>1</i>	<i>2</i>	<i>38</i>
Girard Scattered Sites	<i>109</i>	<i>54</i>	<i>2</i>	<i>0</i>	<i>2</i>	<i>1</i>	<i>8</i>	<i>160</i>
Eastview	<i>37</i>	<i>7</i>	<i>1</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>45</i>
Hilltop Gardens	<i>48</i>	<i>25</i>	<i>0</i>	<i>1</i>	<i>1</i>	<i>2</i>	<i>6</i>	<i>71</i>
Valley West	<i>13</i>	<i>5</i>	<i>1</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>1</i>	<i>18</i>

*Stats as of 12/29/2021*