



New England

AUG 10 2000

U.S. Department of Housing and Urban Development

Connecticut State Office Program Center
Office of Public Housing
One Corporate Center, Suite 19
Hartford, CT 06103-3220

Ms. Colin Vice
Executive Director
Bridgeport Housing Authority
150 Highland Street
Bridgeport, CT 06604-3503

Dear Ms. Vice:

This office has reviewed the Bridgeport Housing Authority's (BHA) Five-year and Annual Public Housing Agency (PHA) Plan submission. As required by Section 588 of the Public Housing Reform Act (PHRA) and the implementation regulations at 24 CFR Part 903, your plan was reviewed for: (1) **Completeness** of required information; (2) **Consistency** with the information and data available to HUD, including your jurisdiction(s) Consolidate Plan; and (3) **Compliance** with the provision of the PHRA or other applicable Federal law.

Based upon our review, this office is unable to approve your PHA Plan. In accordance with 24 CFR §903.23(b)(ii) and (iii), HUD may disapprove a plan if it is not consistent with information and data available to HUD or with the applicable Consolidated Plan for the jurisdiction in which the PHA is located or is not consistent with applicable Federal laws and regulations. On August 1, 2000, this office received correspondence from the Connecticut Legal Services, Inc. (CLS) regarding your plan which is enclosed. CLS provided us with information that your plan may not have been developed in compliance with the provisions of the PHRA. The following violations to the PHA Plan process were identified by CLS:

- (1) No Section 8 participants were represented on the Resident Advisory Board(RAB). CLS stated that your agency used the existing city-wide Resident Affairs Board as its RAB without adding additional members. The BHA may appoint the city-wide Resident Affairs Board to act as its RAB; however, you must add members to provide for representation of families receiving tenant-based assistance. In accordance with 24 CFR§903.13(b)(2), where the PHA has a tenant based program of significant-size, the PHA shall assure that the RAB has reasonable representation of families receiving tenant-based assistance and that a reasonable process is undertaken to choose this representation.
- (2) The BHA did not provide any resources to the RAB. In accordance with 24 CFR §903.13(a)(2), the BHA must allocate reasonable resources to the RAB.

The resources must enable the RAB to provide information to assisted families regarding the BHA's programs and PHA Plan.

- (3) The BHA did not provide the full 45 day review period. Based on documentation provided by CLS, it appears that on May 15, 2000, the BHA initially advertised in the local paper that a public hearing for the PHA Plan would take place on June 27, 2000. This allowed only 43 days advanced notice. In accordance with 24 CFR §903.17(b)(2), no later than 45 days before the public hearing is to take place, the PHA must publish a notice informing the public that the information is available for review and inspection, and that a public hearing will take place on the Plan and the date, time and location of the hearing. In addition, CLS stated that no notice was provided to BHA residents or Section 8 participants. Twenty-four CFR §903.17(c), requires that a PHA shall conduct reasonable outreach activities to encourage broad public participation in the PHA plans.
- (4) The BHA did not properly conduct the public hearing. In accordance with 24 CFR §903.17(a), the PHA's board of directors or other governing body must conduct a public hearing to discuss the PHA Plan. CLS stated that only the Executive Director and one BHA staff member were in attendance at the meeting and no board members were present.
- (5) The BHA did not consult with the RAB relative to any comments received. In accordance with 24 CFR §903.19, the Plan may be submitted to HUD only after the PHA has considered all public comments received and has made any changes to the plan, based on comments, after consultation with the RAB or other resident organization. According to our review of Section 18 of the PHA Plan, it was indicated that the PHA did receive comments on the PHA Plan from the RAB and changes were made to portions of the PHA Plan in response to the comments. However, neither the comments nor the changes made were recorded in the PHA Plan. (See deficiencies noted below).

In order for HUD to approve your PHA Plan, you must submit documentation to verify that the appropriate steps noted above were taken prior to the submission of your current Plan. If you are unable to provide such documentation, a new PHA Plan must be developed in accordance with 24 CFR §903, Public Housing Agency Plans, Final Rule. Evidence of the procedures followed in developing the Plan must be provided in hard copy to this office with your resubmission.

Upon review of your submitted PHA Plan, the following deficiencies were noted which also require correction before your Plan can be approved:

Deficiency #1: In completing Section 6(A)(1), *PHA Grievance Procedures*, *Public Housing*, you answered "yes" to question 1; however, you did not list the procedures as required.

Remedy: You must provide a list of the grievance procedures you have

Deficiency #2: Section 6(B)(2), *PHA Grievance Procedures, Section 8 Tenant-Based Assistance*, was not answered.

Remedy: You must answer the above question.

Deficiency #3: The plan did not contain the Capital Improvement Needs annual statement and Five-Year Action Plan.

Remedy: The Plan must be resubmitted with the CFP Annual Statement and Five Year Action Plan as described in the *Federal Register* dated October 21, 1999, Public Housing Agency Plans, Final Rule, §903.7(g).

Deficiency #4: Section 11, *Homeownership Programs Administered by the PHA*, was not completely filled out. Sections 11(A)(2) Activity Description and 11(B) Section 8 Tenant Based Assistant were left blank.

Remedy: You must completely fill out both of these sections.

Deficiency #5: In completing Section 12(A)(1), *PHA Community Service and Self-sufficiency Programs, PHA Coordination with the Welfare (TANF) Agency*, you answered "yes" that you had entered into a cooperative agreement with the TANF Agency; however, you did not indicate the date that the agreement was signed.

Remedy: You must indicate the date that the cooperative agreement between the BHA and the TANF agency was signed.

Deficiency #6: In completing Section 12(B)(1)(b), *PHA Community Service and Self-sufficiency Programs, Service and Programs offered to Residents and Participants, Economic and Social Self-sufficiency Programs*, you answered "yes" to question b that the PHA does coordinate, promote or provide programs to enhance the economic and social self-sufficiency of residents. However, you did not complete the table describing the programs.

Remedy: Complete the table as required.

Deficiency #7: Section 12(B)(2), *Family Self Sufficiency Program/s*, and Section 12 (C), *Welfare Benefit Reduction*, were not completed.

Remedy: You must complete these sections.

Deficiency #8: In completing Section 18 (A)(2), *RAB Recommendations, Comments*, you indicated that the comments received were provided below; however, no comments were provided.

Remedy: You must provide the RAB comments as required.

Deficiency #9: In completing Section 18(A)(3), *Resident Advisory Board Recommendations*, what manner did the PHA address those comments, you indicated that you changed portions of the PHA Plan in response to comments; however, you did not list the changes.

Remedy: Provide the changes you made to the PHA Plan in response to the RAB Comments as required.

Deficiency #10: In completing Section 18 (B) *Description of Election process for Residents on the PHA Board*, you answered "no" to question 1 that your PHA did not meet the exemption criteria provided section 2(b)(2) of the U.S. Housing Act of 1937. However; you did not complete sections 18 (B)(2) and (3).

Remedy: You must answer question 18(B)(2) and (if required) question 18(B)(3).

Deficiency #11: You did not provide the name of the Consolidate Plan jurisdiction in Section 18(C)(1).

Remedy: You must provide the name of the Consolidate Plan jurisdiction as required.

You must address the above deficiencies as well as provide documentation related to the planning and submission process. In addition, you should share the comments provided by CLS with your RAB for consideration if they were not provided during the initial comment review period.

Should we receive any additional comments that need to be addressed, you will be notified under separate cover. However, we wanted to notify you as early as possible regarding these deficiencies in order to give you sufficient time to resubmit an approvable plan. When resubmitting a Plan file, please be sure to follow the instructions found on the PHA Plan webpage.

If you have any question regarding the information in this letter, please contact Teresa Albrecht, Public Housing Revitalization Specialist at (617) 565-5206 or by electronic mail at teresa_albrecht@hud.gov.

Sincerely yours,

Phyllis Smelkinson
Acting Coordinator

Enclosure