

HOUSING AUTHORITY OF THE COUNTY OF CONTRA COSTA

TO: BOARD OF COMMISSIONERS

FROM: Joseph Villarreal, Executive Director

DATE: October 25, 2011

SUBJECT: STATUS OF PHA PLAN SUBMISSION TO HUD FOR FISCAL YEAR BEGINNING 2011

SPECIFIC REQUEST(S) OR RECOMMENDATION(S) & BACKGROUND AND JUSTIFICATION

I. RECOMMENDED ACTION:

ACCEPT the Housing Authority of the County of Contra Costa's (HACCC) status report on HACCC's PHA Plan submission to HUD for the fiscal year beginning (FYB) April 1, 2011.

II. FINANCIAL IMPACT:

None, informational item only.

III. REASONS FOR RECOMMENDATION/BACKGROUND

The U.S. Department of Housing and Urban Development (HUD) requires public housing authorities (PHA) with housing choice voucher and public housing programs to submit an annual plan called the Public Housing Agency Plan (Plan) that informs HUD, residents, and the public of the PHA's mission for serving the needs of low-income and very low-income families, the housing

CONTINUED ON ATTACHMENT: X YES

SIGNATURE _____
Joseph Villarreal, Executive Director

_____ RECOMMENDATION OF EXECUTIVE DIRECTOR

_____ RECOMMENDATION OF BOARD COMMITTEE

_____ APPROVE

_____ OTHER

SIGNATURE(S):

ACTION OF BOARD ON _____ APPROVED AS RECOMMENDED _____ OTHER _____

VOTE OF COMMISSIONERS

___ UNANIMOUS (ABSENT _____)

AYES: _____ NOES: _____

ABSENT: _____ ABSTAIN: _____

I HEREBY CERTIFY THAT THIS IS A TRUE AND CORRECT COPY OF AN ACTION TAKEN AND ENTERED ON THE MINUTES OF THE BOARD OF COMMISSIONERS ON THE DATE SHOWN.

ATTESTED _____
JOSEPH VILLARREAL, CLERK OF THE BOARD OF COMMISSIONERS AND EXECUTIVE DIRECTOR

cc: CAO Office

BY _____, DEPUTY

needs of the jurisdiction and the PHA's strategy for addressing those needs. The Plan also discusses the PHA's plans for any construction, rehabilitation or demolition projects planned in the public housing program.

Plans are due to HUD 75 days prior to the beginning of a PHA's fiscal year. The Plan is submitted electronically to HUD using the templates, forms and directions provided by HUD. HUD reviews the Plan within 75-days and evaluates the submittal based upon the completeness of the information in the Plan, whether the information in the Plan is consistent with HUD's records and whether the Plan is compliant with federal law.

If HUD determines that the Plan conforms to statutory standards, the Plan is approved. However, if HUD determines the Plan does not conform, it will be rejected. HUD can reject a Plan for technical or substantive deficiencies. Technical deficiencies are minor whereas substantive deficiencies reflect a more significant problem. HUD may not release full funding under the Capital Fund Program until the Plan is approved.

HACCC originally submitted its annual Plan to HUD in January 2011. Since that time, HACCC has had difficulty obtaining HUD's approval of the Plan. HUD identified several technical deficiencies in HACCC's Plan that had not been required in previously approved plans. Each time HACCC revised the Plan as requested, HUD provided a different reason for rejecting the Plan, often requesting information that is not required by federal regulations.

For instance, HUD wanted additional capital fund information that had not been requested in the past, replacement housing factor funding information broken down by grant years, HACCC's Memorandum of Agreement (MOA), HACCC's Corrective Action Plan (CAP), the section from HACCC's Administrative Plan concerning the Violence Against Women Act and Capital Fund grant closeouts from previous years.

On August 29, 2011, Board of Commissioner Chair Uilkema sent HUD a letter expressing concern that HACCC's Plan had not been approved. It asked HUD for a written response indicating either when the Plan would be approved or what actions HACCC must take to complete the Plan.

On September 16, 2011 HUD approved HACCC's Plan for the fiscal year beginning April 1, 2011. A copy of HUD's approval letter is attached to this Board Order. According to the approved Plan, HACCC proposes some of the following projects for fiscal year 2011-2012:

1. HACCC plans to contract with financial and development consultants in FY2011 to develop an approach to the repositioning of its El Pueblo (176 units), Las Deltas (224 units) and Bayo Vista (246 units) public housing projects. HACCC's goal is to increase the number of housing units affordable to public housing eligible families and to provide adequate funding for these units over the long term. Failing that, HACCC will seek to preserve as many units as possible affordable to public housing eligible families with adequate funding for the longer term. Depending on the plans developed, HACCC may apply for either HOPE VI, mixed finance or development funding by March 31, 2012.
2. HACCC may submit demolition or disposition applications to HUD for units at Las Deltas, Bayo Vista or El Pueblo by March 31, 2012.
3. HACCC has already committed 230 project-based vouchers (PBV). HACCC may increase that number up to 1,374 additional units. HACCC's goals in utilizing PBVs are to expand the supply of assisted housing and to increase assisted housing choices. By utilizing PBVs from HACCC, developers are able to leverage funding and produce additional units of new or modernized affordable housing.

A copy of HACCC's Annual Plan for FY 2011 is attached. The Plan and all attachments are available at <http://www.hud.gov/offices/pih/pha/approved/pdf/11/ca011v07.pdf>.

IV. CONSEQUENCES OF NEGATIVE ACTION:

None, informational item only.