# Annual PHA Plan (Standard PHAs and Troubled PHAs) U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires: 03/31/2024

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. The Form HUD-50075-ST is to be completed annually by STANDARD PHAs or TROUBLED PHAs. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA, or Qualified PHA do not need to submit this form.

#### Definitions

- 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 high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment 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, that owns or manages less than 250 public housing units, and any number of vouchers where the total combined units exceed 550.
- (3) Housing Choice Voucher (HCV) Only PHA A PHA that administers more than 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 exceed 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: Rochester Housing Authority PHA Code: NY-041  PHA Type: Standard PHA Troubled PHA PHA Plan for Fiscal Year Beginning; (MM/YYYY): 10/2025  PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  Number of Public Housing (PH) Units 2,178 Number of Housing Choice Vouchers (HCVs) 10,738  Total Combined  Units/Vouchers 12,916 PHA Plan Submission Type: Annual Submission Revised Annual Submission  Availability of Information. 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. 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.						
	PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)  Participating PHAs PHA Code Program(s) in the Consortia Program(s) not in the No. of Units in Each Program						
	Lead PHA:	TILY COUL	Trogram(s) in the Consortia	Consortia	PH	HCV	

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B.	Plan Elements
B.1	Revision of Existing PHA Plan Elements.  (a) Have the following PHA Plan elements been revised by the PHA?  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. □ Operation and Management. □ Grievance Procedures. □ Homeownership Programs. □ Community Service and Self-Sufficiency Programs. □ Safety and Crime Prevention. □ Pet Policy. □ Asset Management. □ Substantial Deviation. □ Significant Amendment/Modification
	(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):  The Statement of Housing Needs and Strategy for Addressing Housing Needs has been updated (see Attachment 19). Deconcentration percentages for this year have been updated (see Attachment 2), the financial resources have been updated (see Attachment 3) to reflect \$97,834,819 in total resources available to RHA. Rent determination changes were made to the flat rents to reflect 80% of the HUD published FMR (See Attachment 4). Operation and Management changes are reflected in a new organizational chart (see Attachment 5) notes the change to 9,835 Section 8 vouchers available, with an updated utilization chart of HCV and other Rental assistance programs (See Attachment 5). The RHA organizational chart has been updated to reflect the current staffing changes to date. The Grievance Procedure has been revised (see Attachment 6) Community Service and Self-Sufficiency Programs language has been updated (see Attachment 8). Safety and Security are now under the Compliance Department (see Attachment 9. Homeownership Plan Section 32 has been updated (see Attachment 17). Significant amendment (see Attachment 20).
	(c) The PHA must submit its Deconcentration Policy for Field Office review.
B.2	New Activities.
	(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?  Y N  ☐ Hope VI or Choice Neighborhoods. ☐ Mixed Finance Modernization or Development. ☐ Demolition and/or Disposition. ☐ Designated Housing for Elderly and/or Disabled Families. ☐ Conversion of Public Housing to Tenant-Based Assistance. ☐ Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. ☐ Occupancy by Over-Income Families. ☐ Occupancy by Police Officers. ☐ Dono-Smoking Policies. ☐ Project-Based Vouchers. ☐ Project-Based Vouchers. ☐ Units with Approved Vacancies for Modernization. ☐ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).
	(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.  Please See Attachments 5, 20 & 23

Progress Report.
Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.  We've made significant progress despite the pandemic-specific examples are listed in the Achievement Section of the goals. See pages 4 through 11.
Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. RHA 5-Year Action Plan was approved on August 6, 2021.
Most Recent Fiscal Year Audit.
(a) Were there any findings in the most recent FY Audit?
Y N □ ⊠
(b) If yes, please describe:
Other Document and/or Certification Requirements.
Resident Advisory Board (RAB) Comments.
(a) Did the RAB(s) have comments to the PHA Plan?
Y N
(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.
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 HUD-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 element of the Plan?
Y N □ ⊠
If yes, include Challenged Elements.
Troubled PHA.  (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?  Y N N/A  \[ \sum \square \
(b) If yes, please describe:

D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	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 fulful, 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: Program Eligibility Regardless of Sexual Orientation, Gender Identity or Marital Status as Required by HUD's Equal Access Rule
	Describe fair housing strategies and actions to achieve the goal Accessibility to Public Housing Programs regardless of Sexual orientation, gender identity, or Marital Status RHA has updated its applications to ensure applicants can have access to affordable housing despite their sexual orientation, gender identification, or their marital status.
	Fair Housing Goal:  Describe fair housing strategies and actions to achieve the goal
	Fair Housing Goal:

	Describe fair housing strategies and actions to achieve the goal	
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### Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

- A. PHA Information. All PHAs must complete this section. (24 CFR 8903.4)
  - A.1 Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

- B. Plan Elements. All PHAs must complete this section.
  - B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no." (24 CFR §903.7)

☑ Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income, and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(ii))

Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

☑ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR 8903.23(b)) Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher-income tenants into lower-income developments and lower-income tenants into higher-income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA's procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)) A statement of the PHA's policies that govern resident or tenant eligibility, selection, and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

☑ Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital, and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use of the resources. (24 CFR §903.7(c))

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	Designated Housing for Elderly and Disabled Families. Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, 5) the number of units affected and; 6) expiration date of the designation of any HUD approved plan. Note: The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))
	□ Demolition and/or Disposition. With respect to public housing only, describe any public housing development (s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: <a href="http://www.hud.gov/offices/pih/centers/sac/demo-dispo/index.cfm">http://www.hud.gov/offices/pih/centers/sac/demo-dispo/index.cfm</a> . (24 CFR §903.7(h))
	☐ Mixed Finance Modernization or Development. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: <a href="https://www.hud.gov/program">https://www.hud.gov/program</a> offices/public indian housing/programs/ph/hope6/mfph#4
	Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:  https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6 (Notice PIH 2011-47)
	☐ HOPE VI or Choice Neighborhoods. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for
B.2	New Activities. If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."
	PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))
	If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.
	☐ Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.
	Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR 5903.7(r)(2)(i))
	Asset Management. State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))
	M Pet Policy. Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))
	public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))
	Safety and Crime Prevention (VAWA). Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of
	☑ Community Service and Self Sufficiency Programs. Describe how the PHA will comply with the requirements of (24 CFR §903.7(1)). Provide a description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(1))
	M Homeownership Programs. A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))
	☑ Grievance Procedures. A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))
	☑ <b>Operation and Management.</b> A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))
	☑ Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

other housing assistance in connection with such conversion. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/conversion.cfm. (24 CFR §903.7(j)) Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices. Occupancy by Over-Income Families. A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family, (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.503) (24 CFR 903.7(b)) Occupancy by Police Officers. The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.505) (24 CFR 903.7(b)) Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: Notice PIH 2009-21 and Notice PIH-2017-03. (24 CFR 8903.7(e)) ☐ Project-Based Vouchers. Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan (24 CFR §903.7(b)) Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing. modernization in accordance with 24 CFR 8990.145(a)(1). Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided. B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1)) B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section (24 CFR §903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XXXXXXXX." B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p)) C. Other Document and/or Certification Requirements. C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19) C.2 Certification by State of 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. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable. C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-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. Form HUD-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. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA

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EX. Conversion of Fubic mousing under the voluntary of mandatory Conversion programs. Describe any public nousing outloings project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or

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fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's imitatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

- C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.
- C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

#### D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants'... PHA Plans (including any plans incorporated therein).... Strategies and actions must affirmatively further fair housing ...." Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement, and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 7.52 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

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### **Resources:**

- 1. City of Rochester, 2034 Comprehensive Plan
- 2. ACT Rochester http://www.actrochester.org
- 3. County of Monroe 2020-2024 Strategic Plan and 2020 Action Plan

### ATTACHMENT 1

### Mission, Vision Statement, Goals & Objectives

### MISSION STATEMENT

"Everyone living in the region will have access to high-quality, safe, affordable housing in communities free of barriers that prevent individuals and families from realizing and achieving their goals and sustaining self-sufficiency."

#### VISION STATEMENT

"To be the leader in leveraging services and affordable, safe, high quality, and stable housing in diverse and inclusive communities to increase opportunities and improve lives."

#### **FIVE-YEAR GOALS**

The goals and objectives contained in this document established by the Rochester Housing Authority for the period beginning October 1, 2025, and ending September 30, 2030, and are as follows:

### GOAL ONE: Provide: Increase and improve RHA housing opportunities, while maintaining the quality and security of RHA housing communities.

- Improve and maintain the quality of RHA housing by reducing NSPIRE deficiencies to enhance the quality of life for residents and participants.
- Increase the number of affordable housing units in RHA and portfolio and diversify the types of housing to meet the changing needs of the community.
- Improve the security of RHA communities by addressing the rise in crime rates, (such as mental illness, drug abuse, homicide, and domestic violence) affecting the safety and security of RHA communities.

## <u>GOAL TWO:</u> Support: Increase RHA's engagement with residents, participants, and the Greater Rochester community to create a supportive environment focused on resident and community needs.

- Provide connections to targeted resources in the greater Rochester area to help RHA residents and participants overcome their unique challenges.
   Continuously evaluate and improve the effectiveness and quality of services.
- Develop and coordinate a network of service providers and strategic partners to receive and respond to referrals and partner to provide relevant services.
- Strengthen resident and participant involvement and leadership to ensure resident and participant needs are centered in program design and delivery.

### **GOAL THREE:** Serve: Improve customer service externally and internally.

- Design and implement a process for soliciting and collecting real-time customer service feedback from key stakeholder groups. Produce annual reports summarizing customer service feedback to demonstrate improvements over time.
- Increase electronic interactions of PH residents, HCV participants and landlords with RHA to [represent] 25% of targeted interactions (reducing mail, in-person, or phone interactions)

• Identify, secure resources, and launch specific process improvements and streamlining opportunities through the integration of technology at a rate of one target deliverable per year of initiative.

<u>GOAL FOUR:</u> Grow: Improve, diversify, and grow overall revenue, resources, and community partnerships in service of the greater Rochester community sufficient to achieve Goals 1-3.

- Partner and collaborate with community partners, neighborhood organizations, and landlords, to address housing needs and services in the greater Rochester area
- Identify, pursue, and secure funding opportunities outside of HUD to expand housing opportunities and services to sufficiently achieve Goals 1 and 2.

### GOAL FIVE: Communicate: Enhance external and internal communication.

- Convene an internal working group of Associates from across RHA to guide the implementation of Goal 5.
- Enhance internal communication by adopting technology to professionally collaborate effectively without regard as to an Associate's physical location.
- Improve RHA's public-facing brand.

### **GOAL SIX:** Enhance – Foster an inclusive and supportive work environment.

- Assess and refine organizational structure in alignment with strategic plan and budget and communicate with staff by the end of Year 1; review annually and update as needed.
- Build organizational capacity from the top down through hiring, promotion, and retention practices that demonstrate and support RHA's commitment to excellence.
- Create annual action plans to make RHA the best place to work based on analysis of employee feedback data collected from multiple sources.
- Improve cross-departmental collaboration by documenting critical processes, identifying interdependencies, and implementing targeted cross-training activities.
- Build a positive culture of learning by adopting an employee learning and talent development approach to ensure RHA is equipped to deliver the highest quality programs and services.
- Increase morale among staff and residents by building community through participation in social events.

### **PREVIOUS GOALS:**

<u>GOAL ONE</u>: Grow and sustain the Rochester Housing Authority's (RHA) public housing programs and inventory; achieve and maintain a *High Performer* HUD status. Preserve and increase the inventory of RHA-owned or controlled properties and grow financial assets.

• Support departmental reviews of the Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) Indicators and additional areas deemed prudent.

- Streamline procedures and automate processes through the smart use of technology, thus enabling the development of key performance indicators such as exception reports. (The RHA Housing Choice Voucher program received High Performer status from HUD on the Fiscal Year 2015 SEMAP review.)
- Maintain a vacancy rate between 1% and 3% in accordance with HUD standards.
- Target RHA Capital Fund Program and maintenance program towards improving and rehabilitating housing inventory.
- RHA may use the Capital Fund Finance Program to fund certain development activities.
- Transform public housing properties through HUD's Rental Assistance
   Demonstration (RAD) to preserve its public housing stock through comprehensive modernization or new construction.
- Develop RHA-owned mixed-income and multi-family housing.
- Seek out grant opportunities to bring additional revenue and resources to RHA.
- Participate in community revitalization initiatives to improve and add to our existing quality affordable housing portfolio.
- RHA may identify certain scattered sites and/or complexes for disposition for sale to support its redevelopment activities.
- RHA plans to increase the number of four-plus bedrooms in its portfolio through acquisitions and/or new construction.
- RHA intends to partner with the City of Rochester by rehabilitating targeted properties in selected communities to reduce blight, increase homeownership, and increase independence.
- RHA may create wholly owned entities for management and housing development purposes.
- RHA will continue participating in the City of Rochester's Land Bank program to acquire additional properties.
- Develop a preventative maintenance plan to improve housing quality and thus increase REAC scores.

**Achievements:** RHA continues to work with its software provider to develop frequent, accurate reports that enable staff to monitor SEMAP and PHAS scores. Even though the effects of the pandemic remain, HUD has reimplemented PHAS scoring SEMAP to follow. The new HUD NSPIRE inspection protocols have been implemented and follow-up work order process modified to correct deficiencies. Capital Project's staff meets regularly with property management and maintenance to prioritize projects, including extensive rehabs to improve and preserve the public housing stock and further its "Change the Face of Public Housing" Initiative. Resident input is also gathered through the Annual Plan process, monthly Resident Relations Committee meetings, and project-specific meetings, and resident commissioners are invited to participate in the planning process. The Resident Relations Committee meetings now include all resident council presidents to participate in furthering RHA's mission. These meetings have proven effective in garnering resident concerns and ideas, as well as providing information the presidents take back to their residents. The vacancy rate increased during the pandemic, and staff has developed and implemented a revised plan to fill vacant units and address errors in the HUD PIC system to increase the occupancy rate. Incentives have been put in place and we are seeing an increase in our occupancy rate. Rental arrears saw a dramatic increase due to an eviction moratorium, and now that the eviction moratorium has been lifted, evictions are proceeding, but there is a large backlog. Staff continues to work one-on-one with residents on ways to get current with their rent using repayment agreements and applying for other resources. We are still encountering "skip outs" which result in additional costs to RHA and added to the vacancy days. RHA has/is participating in several community revitalization initiatives such as the Inner

Loop North, Closing the Gaps Six City Cohort, City of Rochester FEC program, Guardian Ad Litem program, Coalition to Prevent Lead Poisoning, homeless initiatives, RMAPI initiatives, and various planning efforts with the City. RHA has partnered with a developer to develop Rental Assistance Demonstration (RAD) conversion and affordable housing projects. The Federal St-Scattered Site project closed in May 2023 and is expected to be fully completed in the Fall of 2024. The Parliament-Fairfield RAD conversion project closed in October 2023 and is expected to be completed in the Spring of 2025. A 9% LIHTC application was submitted for the Fernwood Affordable Housing Development project and a concept application was submitted to HCR for the Glenwood RAD conversion project. If awarded, the Fernwood project target closing date will be Fall/Winter 2024 and Glenwood in September of 2025. The rest of RHA's portfolio physical needs assessments and environmental testing reports are being used to create a pipeline of preservation projects. RHA is working with the development partner on the best strategies for the preservation of the rest of RHA's housing portfolio. RHA has identified single-family scattered site homes that will be part of its Section 32 Homeownership program and will be investing Capital Fund Program funds in them before homeownership. Resident Services staff continue to meet one-on-one with residents interested in purchasing their homes. RHA continues to work with RHC in restructuring, staffing and future plans to develop, manage, and maintain more affordable housing.

<u>GOAL TWO</u>: Develop and expand the Rochester Housing Authority (RHA) Family Self-Sufficiency (FSS) programs, education, and training opportunities. Create a supportive environment and path to self-sufficiency for residents and participants.

- Target long-term workforce development activities through Self-Sufficiency programming focused on career development.
- Partner with agencies to provide services for our residents that will help improve their economic stability.
- Promote healthy living and healthy choices for residents.
- Identify, align, and promote existing services in cooperation with Rochester-Monroe Anti-Poverty Initiative (RMAPI), Rochester Housing Charities, the City of Rochester, Monroe County, the State of New York, and other service providers.
- Continue supportive programs for seniors and people with disabilities.
- Develop and grow our homeownership program to better prepare participants for owning their own homes and provide them with more opportunities.
- RHA plans to create a pre-apprenticeship type program to provide training opportunities to promote self-sufficiency and independence.
- Contract with an agency to provide service coordination to all residents in public housing. The goal is to keep residents in housing and improve their quality of life.
- Explore partnering with community providers to implement a program that supports our residents with mental health problems, i.e., a supportive housing program that provides intensive case management, medication monitoring, meals, housekeeping assistance, etc.
- Partner with the City of Rochester to develop an eviction prevention program through a financial counseling program.
- Partner with the Housing Council of Rochester at Pathstone to promote and increase homeownership.
- RHA plans to partner with the Rochester Financial Empowerment Center to offer free inhouse financial counseling to residents and participants.

Achievements: RHA continues to enthusiastically support families on their self-sufficiency journeys. In 2023, 13 families successfully completed their FSS contracts earning over \$79,000 in combined escrow savings. RHA continued to create a pipeline of successful homeownership participants and worked very hard with them this past year to overcome the challenges faced during the pandemic to ensure the successful purchase of their homes. In 2023, 20 participants became homeowners. RHA continues developing its Section 32 Homeownership program and submitted its first application to HUD's Special Applications Center (SAC) for seven public housing homes to be sold to the residents. The Resident Services Team was very adaptive during the pandemic in creating opportunities for FSS participants to achieve their goals and successfully complete or continue in the program. New partnerships were created, and existing partnerships were modified to assist participants. RHA continues to work with the City, FEC, RMAPI, and other organizations in their missions and identifying resources.

### **GOAL THREE**: Establish a productive Section 3 Program that provides training and jobs for Public Housing and Section 8 residents.

- Revise the current Section 3 policy to encompass the efforts we are putting forth and align with HUD regulations.
- Continue improving our hiring policy to increase employment opportunities for Section 3 candidates.
- Improve outreach efforts to Public Housing and Section 8 residents.
- Continue developing our internal training program for Section 3 candidates and continue to look for partnerships with other training providers.
- Increase contractors' awareness to create job and training opportunities for Section 3.
- Continue working with eligible contractors to assist them in qualifying as Section 3 businesses.
- Continue to provide construction opportunities for Section 3 training graduates via rehabilitation projects.
- Work with the City and County to develop a consistent Section 3 plan that works for each agency.
- Align our Section 3 program with RMAPI goals and assist in a broader community effort to decrease poverty.

Achievements: RHA revised its Section 3 Plan in accordance with HUD guidelines and requirements and continues to prioritize outreach to local contractors small and large to solicit Section 3 eligible businesses; adding 1 new business in 2023 and additional business in 2024. Section 3 businesses earned over 1.6 million dollars in contracts in 2023. RHA's development/RAD conversion projects are exceeding Section 3 and MWBE goals. RHA will continue to make this a priority in future projects.

<u>GOAL FOUR:</u> Improve Rochester Housing Authority (RHA) communications, both internal and external, to increase transparency, and accountability, and develop trust.

- Develop concentrated efforts to improve advocacy at the Local, State, and Federal levels.
- Continue developing and implementing an internal and external Communications Plan that synchronizes all RHA communications with employees, the public, and other government entities, providing a unified and consistent message.
- Utilize RHA's communication consultant to promote RHA activities and positive influence on the community.
- Increase effective communication with internal and external stakeholders by informing

- them of RHA activities and accomplishments.
- Prioritize providing information in non-English languages. Improve RHA's website to include translation to non-English languages.
- Increase effective communication with residents and program participants.
- Continue to provide training to staff on effective communication and customer service.
- RHA will implement ways to improve Information Technology and related infrastructure by staying current with technology.
- Continue to utilize RHA's Public Relations Firm to produce positive substantive news stories and releases about RHA.
- Have new Board of Commissioner members formally introduced to staff and residents by hosting a "meet & greet."
- Increase the number and frequency of employee and resident events to improve morale and relations.

**Achievements:** RHA continues its membership with national organizations; NAHRO and PHADA which advocate heavily for PHA's. As a member of NYSPHADA, the executive director is on their board and also on the legislative committee and advocates at the State level for funding and other legislative efforts that affect PHAs. NYSPHADA has successfully advocated for line items in the NYS budget specifically for upstate PHAs with \$125 million previously and proposed \$150 million in the 2024-25 budget, RHA contracts with a communication consultant to help support RHA's communications efforts internally and externally and assist with advocacy efforts. This past year RHA's focus was on increased efforts to inform employees, residents, program participants, and community partners of all the great things RHA accomplishes and is working on. Focused efforts to strengthen and increase partnerships in the community to provide more services for residents and program participants. RHA has continued its partnership with Trillium Health in providing health services to residents and staff via their MAC unit. Vaccine and booster clinics were set up for residents and employees. We were able to facilitate more in-person events for residents including family sites this past year. The senior holiday party was a big hit! Two Town Hall meetings were held in 2023 for employees and board members, along with a holiday party to improve communication and morale. RHA partnered with the Project Lighthouse organization again in 2023 to distribute Thanksgiving meals to residents and hosted a summer outreach cookout for residents at various RHA sites.

<u>GOAL FIVE</u>: The Rochester Housing Authority (RHA) will utilize the deconcentration policy guidelines to achieve a balanced income mix for public housing residents.

- Leverage Family Self-Sufficiency and Section 3 programming to assist affordable housing residents with increasing current income levels. Increased income will enable residents to access a broader spectrum of housing options.
- Provide mobility counseling to all applicants.
- Conduct landlord outreach in conjunction with the ongoing promotion of the Housing Choice Voucher Program and other Voucher and Grant Programs.
- Continue to build partnerships with community agencies to provide more opportunities for our residents and participants.
- Expand our capacity for the Family Self-Sufficiency and Homeownership programs.
- Explore opportunities to develop housing that includes market-rate units.

**Achievements:** – RHA continues its commitment to assisting residents, participants, and the community we serve with their self-sufficiency goals. In 2022, Section 3 businesses earned 1.6

million dollars in contracts. 13 families completed the Family Self Sufficiency program earning over \$96,000 in combined escrow savings. 12 families became homeowners. RHA's Admissions and Continued Occupancy Policy (ACOP) was reviewed and amended to keep current with regulations and the need to update policies. For example, the Transfer Policy was revised to allow RHA more flexibility to assist residents in imminent danger more quickly.

<u>GOAL SIX:</u> Expand and create housing choice opportunities by educating, collaborating, and increasing vouchers, participants, and landlords.

- Continue to market, educate, and recruit new landlords who want to participate in the program annually.
- Implement project-based management and operations; transition Public Housing Units into Project-Based Voucher Units through the process of disposition, demolition, Rental Assistance Demonstration, or conversion, with HUD approval.
- Provide mobility counseling to all applicants and participants in the moving process. Identify and implement methods for pre-move and post-move services to applicants and participants.
- Increase the administrative efficiency of the Section 8 programs.
- Obtain additional vouchers as buildings convert from public housing and multi-family programs.
- Grow the existing voucher program and pursue opportunities for new programs.
- Develop and implement the process for waitlist management to include the more frequent opening of the waiting list.

**Achievements:** RHA continues to create housing choice opportunities. From July 2020 to July 2021, RHA made seven landlord incentives available to reduce financial burdens to the landlords and increase safe, affordable housing for participants: Repayment Plan; Tenant Damage Reimbursement; Security Deposit Initiative; Lease up Bonus, Rehabilitation Cost Recovery Plan; and Lead Clearance/Mold Inspection. In May 2021, RHA was one of nine PHAs who were selected to participate in the Mobility Demonstration Program, now known as the Community Choice Demonstration (CCD) Program to assist families with deconcentrating poverty. RHA will receive 74 additional vouchers over the next 5 years for families participating in the demonstration. In August 2022, RHA was awarded 4 HCV vouchers as part of HUD's Foster Youth to Independence (FYI) initiative. Under FYI, RHA will provide housing assistance for youth who are at least 18 years and not more than 24 years of age who left foster care or will leave foster care within 90 days and are homeless or at risk of becoming homeless at age 16 or older. In August 2021, RHA was awarded 117 Emergency Housing Vouchers to assist individuals and families who are homeless, at risk of homelessness, fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability. In October 2022, RHA received 43 incremental "fair share" vouchers, based on a formula that included such factors as severe cost burden, overcrowding, substandard housing for very low-income renters, homelessness, and administrative capacity. In November 2022, RHA received 25 additional Mainstream Vouchers to assist households that include a non-elderly person(s) with disabilities to lease affordable units. This award includes extraordinary funding to support administrative costs, including activities to support housing search and lease-up of eligible applicants. Fees can be used for costs related to the retention, recruitment, and support of participating owners in the form of security deposits, signing bonuses, vacancy payments, and damage mitigation. In October 2022, RHA was awarded 43 additional incremental "fair share" vouchers.

<u>GOAL SEVEN:</u> Expand the opportunities for quality affordable housing within the City of Rochester and Monroe County. Diversify and grow overall revenue, resources, and community partnerships.

- Explore, propose, and develop new quality, affordable rental units through RHA construction and public-private partnerships.
- Explore and analyze opportunities to benefit from Low-Income Housing Tax Credits (LIHTC) in potential site development or redevelopment projects. RHA intends to apply for Low-Income Housing Tax Credits, bonds, various grants, and other available programs to support the development and expansion of housing opportunities.
- Continue to evaluate the current housing inventory for Rental Assistance Demonstration (RAD) eligibility. Explore programmatic homeownership opportunities for all low to moderate-income residents.
- Seek partnership opportunities that facilitate the development of additional quality affordable housing units.
- Develop a long-term strategy to prevent or mitigate the loss of existing affordable housing stock by preserving, rehabilitating, or reconstructing.
- Expand Veterans' Housing programming and activities.
- Develop and promote housing solutions for the homeless population of Rochester and Monroe County.
- Increase participation, decrease poverty concentration, and prevent de facto discrimination in compliance with MBE, WBE, and Section 3 Federal and RHA established policies.
- Effectively leverage RHA affiliates to partner on affordable housing development projects.
- Utilize Small Area Fair Market Rents, if feasible.
- Continue to work with the City and County on neighborhood planning and development initiatives.

**Achievements:** RHA continues to work with its developer partner to further the RAD and affordable housing development pipeline projects. Federal St./Scattered Sites RAD project development is scheduled closed in May 2023 and it currently under construction at the Federal Street site as well as 37 scattered site units. Completion of this project is anticipated in Spring 2025 The next RAD project, Parliament/Luther Circle, is well underway with unit, building, and site renovations and some demo and new build to add accessible units and community space to the properties. With zoning approvals in place, designs finalized, and a 4% LIHTC application submitted. RHA continues to forward with the development of its Fernwood Parcel which will be a two-phase project, with the first phase a new construction 4-story, 65-unit building that will have a public library attached to it. A 9% LIHTC application has been submitted. The second phase will consist of a new road connecting Fernwood Ave and Rosemary Dr., so Twenty-One single-family homes can be constructed. These homes will be offered for homeownership opportunities. RHA's RAD project at Glenwood Gardens is moving forward in the design phase. Physical needs assessments and environmental testing have been completed on most of RHA's public housing, and the reports and data are being analyzed to develop a 5 and 10-year pipeline of preservation and development projects. RHA has had several meetings with the City NBD department and has contracted with a consultant to perform a feasibility assessment to determine if a competitive Choice Neighborhood Initiative application for the North Inner Loop project is feasible. RHA public housing sites at Holland Townhouses, Lena Gantt Estates, Harriett Tubman Estates, and scattered sites will be considered as part of this assessment. Periodic meetings with the City development team continue on at least a quarterly basis.

**GOAL EIGHT:** Provide excellent services that are based on best practices and meaningfully, involve clients in the entire lifecycle, from development to operations. Ensure work processes, systems, and staff are integrated and aligned

to support RHA's mission and to enhance operational effectiveness and efficiency. Support our employees to enhance an organizational culture of excellence.

- Provide resident outreach to ensure an understanding of all services provided by RHA.
- Utilize current technology to communicate opportunities to residents and program participants.
- Conduct resident and program participant surveys to determine needs.
- Review and update RHA's Strategic Plan. Conduct learning and training sessions with staff and residents.
- Set department goals to improve services to clients and train staff accordingly.
- Continue to support the Resident Advisory Board by providing funding, staff support, and meeting space. Continue monthly meetings with the Resident Relations Committee with agenda items from both residents and staff.
- Develop meaningful ways to engage program participants to participate in planning sessions.
- Develop a workforce to support succession planning and career ladders.
- Build a system for training and supporting employees to reach their full potential based on training needs assessment.

Achievements: RHA continues to utilize tools available to communicate and "get the word out" to residents, participants, and community partners. We use Robo-call, texting, Facebook, email, PA systems, and/or written notices in English and Spanish and postings across the organization to inform residents, participants, employees, and community partners of new information, updates, and opportunities. We continue to publish newsletters and will look to increase the frequency. RHA also kept up very well with posting key updates on and managing its website. Even with the pandemic, we were able to train staff, and employees were able to participate in virtual training. Employee desktop computers were replaced with laptops to be more efficient and flexible. To better serve the residents, RHA hosts a customer service hour with residents at RHA's various developments. RHA hosts monthly Admissions and Continued Occupancy Policy (ACOP) to improve staff knowledge of changing the policies. RHA is working with its Human Resources department to implement a comprehensive succession plan to enhance career growth among its staff. To promote a robust exchange of ideas centering around our residents we have expanded the monthly resident relations meetings to include representation from all resident councils. Results of the increased engagement includes resident surveys to obtain feedback for the renewal of vendor contracts and improved outreach efforts for the affordable internet project.

GOAL NINE: Improve employee retention and hiring practices to sustain a stable and effective workforce and minimize costs and losses in productivity. Enhance employee professional development and training. Improve employee engagement and recognition strategy. Foster an inclusive and supportive work environment. Reevaluate RHA's hiring practices to be more proactive.

- Work closely with the City's Civil Service Commission to streamline the hiring process.
- Execute a talent acquisition plan that includes strategies for community outreach and recruitment of a diverse workforce.
- Reevaluate RHA's pay structure to become more competitive in the employment market.
- Study the reasons behind employee turnover and address any concerns affecting employee turnover.
- Create an insightful program to increase morale and employee satisfaction.

- Explore the establishment of an internship program.
- Promote a continuous learning culture by delivering talent and organizational development strategies focused on motivating, engaging, and educating a high-performing workforce.
- Use a diverse array of training and learning formats to provide customized courses that focus on employee growth and future performance.
- Provide a range of management and leadership development opportunities, linked by clear career pathways and succession planning routes, to build the next generation of professional leaders.
- Create a mentorship development program.

**Achievements:** -RHA has evaluated its pay structure and completed a salary study in March 2021 and will be completing another in 2024. We have contracted with several temp agencies, developed incentives, and revised the organizational structure. We have since implemented new salary ranges for all titles, reviewed job titles and job descriptions within departments, and are analyzing department structures. RHA will again initiate a succession planning program for employees wishing to advance. RHA has also developed a plan to attract and recruit a diverse workforce. RHA will work with the Civil Service Commission to develop solutions to identify pain points, and to find solutions that benefit both RHA and the Commission. We're leveraging community partnerships by reaching out to community organizations, schools, and other institutions to build partnerships and identify potential candidates. RHA attends job fairs and other community events to promote job opportunities and connect with potential candidates. By conducting exit interviews with employees who have recently left the organization we can gather feedback to understand their reasons for leaving and any concerns they may have. Then we will use this information to identify trends and patterns in employee turnover. In 2022 RHA created an engagement program to increase morale and employee satisfaction and continues to focus on employee appreciation and recognition initiatives. RHA will establish an internship program that will provide hands-on experience for students, to recruit potential future employees. Currently, we offer a diverse array of learning formats to cater to different learning styles and preferences, including online courses, classroom training, webinars, and self-paced learning modules. We partner with external training providers to bring in new perspectives and expertise. The HR department is researching and developing management and, senior leadership development opportunities, that are linked by clear career pathways and succession planning routes. To increase employee retention and enhance leadership skills the Human Resources department will develop a mentorship program that identifies potential mentors and mentees within our organization, and during the program, they will receive training on active listening, providing feedback, and setting goals, etc.

### **GOAL TEN:** Evaluate Rochester Housing Authority's (RHA's) Policies governing its operations and administration of programs.

- Review and update RHA's Admissions and Continued Occupancy Policy (ACOP) and present to the Board of Commissioners for approval.
- Review and update RHA's Administrative Plan and present it to the Board of Commissioners for approval.
- Revise and update RHA's Procurement Policy and present it to the Board of Commissioners for approval.
- Revise and update RHA's Section 3 Policy and present it to the Board of Commissioners for approval.
- Revise RHA's Emergency Preparedness Plan to include everything learned from the COVID-19 Pandemic

Achievements: RHA's COVID Action Plan was created in March 2020 and has been periodically revised and accepted by the Board of Commissioners. As local, state, and nationwide conditions change, RHA has updated its plan. Administrative Plan revisions were drafted, reviewed, and approved for Public Comment in September 2021. HUD issued new Section 3 requirements, and RHA put a team together to review and revise RHA's Section 3 Plan, which was approved by the board in July of 2021. The Public Housing staff is reviewing the ACOP and continuously present recommended revisions and updates to the Board. The Administrative Plan was updated in August 2021 and revisions were approved by the Board in September 2021. In accordance with the requirements of the Community Choice Demonstration (CCD) Program, RHA updated the Administrative Plan to add a local preference for families with at least one child ages 13 or under that live in a census tract with a poverty rate of 30% or higher. If there are not enough families on the waiting list that meet the required preference, RHA will select the next available family with at least one child 17 or older from the Waiting List. This preference will be applied to a limited number of families each year in accordance with the enrollment schedule of the CCD program. RHA also updated the Administrative Plan to extend the initial term of the voucher search term from 60 calendar days to 90 calendar days. In light s of the challenges that HCV families are facing in the local rental market, there is no limit on the number of extensions that RHA can approve. The procurement policy is currently under review and will be revised and presented to the Board.

### ATTACHMENT 2

### Statement of Deconcentration and Other Policies that Govern Eligibility, Selection, and Admission

On December 22, 2000, The U.S. Department of Housing and Urban Development published its Final Rule for the Deconcentration of Public Housing. The rule, 24 CFR Part 903.2, requires Public Housing Authorities to monitor average income levels at each family development to ensure the average income of residents falls within a specific range. As part of this requirement, RHA will:

- Determine the PHA-wide average income of families residing in developments subject to Deconcentration requirements. RHA shall also determine the average family income for each development subject to Deconcentration requirements.
- Determine whether each of its covered developments falls above, within, or below the Established Income Range. The Established Income Range is 85 percent to 115 percent, inclusive of the PHA-wide average income for covered developments.
- Provide explanations for developments that fall outside the Established Income
  Range. RHA may explain or justify the income profile for these developments as
  being consistent with and furthering two sets of goals: the goals of
  Deconcentration of poverty and income mixing as specified by the statute
  (bringing higher-income tenants into lower-income developments and vice versa);
  and the local goals and strategies contained in the PHA Annual Plan.
- Provide a remedy for a covered development where no justification is provided.

### Within 24 CFR Part 903.2, HUD provides PHAs with the following methods to bring the income concentrations within an acceptable range.

- (A) Providing incentives designed to encourage families with incomes below the Established Income Range to accept units in developments with incomes above the Established Income Range, or vice versa, including rent incentives, affirmative marketing plans, or added amenities.
- (B) Targeting investment and capital improvements toward developments with an average income below the Established Income Range to encourage applicant families whose income is above the Established Income Range to accept units in those developments.
- (C) Establishing a preference for admission of working families in developments below the Established Income Range.
- (D) Continuously review the waiting list to further the goals of Deconcentration and if necessary, skip a family to reach another family to further this goal.
- (E) Providing such other strategies as permitted by statute and determined by RHA in consultation with the residents and the community, through the PHA

Annual Plan process, to be responsive to the local context and the PHA's strategic objectives.

In carrying out its Deconcentration efforts, RHA will ensure its actions meet the following HUD requirements:

- (1) Nondiscrimination. A PHA must carry out its PHA Plan in conformity with the nondiscrimination requirements in Federal civil rights laws, including Title VI of the Civil Rights Act of 1964 and the Fair Housing Act. A PHA cannot assign persons to a particular section of a community, a development, or a building based on race, color, religion, sex, disability, familial status, or national origin for purposes of segregating populations (Sec. 1.4(b) (1) (ii) of this title).
- (2) Affirmatively Furthering Fair Housing. PHA policies that govern eligibility, selection, and admissions under its PHA Plan should be designed to reduce racial and national origin concentrations. Any affirmative steps or incentives a PHA plans to take must be stated in the admission policy. (i) HUD regulations provide that PHAs should take affirmative steps to overcome the effects of conditions which resulted in limiting the participation of persons because of their race, national origin, or another prohibited basis (Sec. 1.4(b) (1) (iii) and (6) (ii) of this title). (ii) Such affirmative steps may include but are not limited to appropriate affirmative marketing efforts, additional applicant consultation and information, and provision of additional supportive services and amenities to a development.
- (3) The validity of the certification. (i) HUD will take action to challenge the PHA's certification under Sec. 903.7(o) where it appears that a PHA Plan or its implementation:
  - (A) Does not reduce racial and national origin concentration in developments or buildings and is perpetuation segregated housing; or
  - (B) Is creating new segregation in housing. (ii) If HUD challenges the validity of a PHA's certification, the PHA must establish that it is providing a full range of housing opportunities to applicants and tenants or that it is implementing actions described in paragraph (d)(2)(ii) of this section. (e) the relationship between poverty deconcentration and fair housing. The requirements for poverty deconcentration in paragraph (c) of this section and for fair housing in paragraph (d) of this section arise under separate statutory authorities and are independent.

Deconcentration Data					
Development Name	Average Income as of 1/30/25	% of Development			
Atlantic Townhouses	\$15251.65	56.9%*			
Bay-Zimmer Townhouses	\$19533.27	72.8%			
Holland Townhouses	\$27643.22	103.1%			
Capsule Dwellings	\$27888.56	104.0%			
Bronson Court	\$23635.91	88.1%			
Seneca Manor Townhouses	\$37971.15	141.6%*			
Lexington Court Apartments	\$25192.18	93.9%			
Harriet Tubman Estates	\$26563.16	99.1%			
Lena Gantt Estates	\$25062.22	93.5%			

The majority of public housing family sites fall within HUD's 85 to 115% acceptable deconcentration range. Three sites (Atlantic Townhouses, Bay-Zimmer and Seneca Manor Townhouses) lie outside this range; however, RHA has reviewed each and developed procedures to monitor and correct the trend. Developments outside of the acceptable deconcentration range will be addressed as vacancies arise in those locations. When a vacancy becomes available, the unit will be offered to an appropriate family whose income will either lower or raise the average income for the complex. This process will continue until such time that the complex falls within the acceptable range. All steps implemented will comply with 24 CFR 903.2. Due to the Fairfield Village – Luther and Scattered Sites RAD Conversion projects, several vacant units at Seneca Manor Townhouses were used for the relocation of the families impacted by the conversion projects without consideration of income to ensure that the families were comparably relocated in accordance with the RAD Relocation Plan. Since the last deconcentration survey conducted in January 2024, Atlantic Townhouses has had zero (0) family vacancies available to offer to a higher-income family to raise the average income. Bay-Zimmer Townhouses, on the other hand, has had four (4) vacancies since the last survey, none of which have been occupied. However, RHA will continue to follow the Deconcentration Policy to ensure that any future vacancies are filled with families whose income levels will either increase or decrease the average income, as needed, to bring developments within HUD's acceptable deconcentration range.

### Policies that govern eligibility, selection, and admissions

The policies that govern eligibility, selection, and admission in both the Rochester Housing Authority's Public Housing Programs and Voucher Programs are found in our Admissions and Continued Occupancy Policy and our Housing Choice Voucher Administrative Plan.

In general, the RHA Admissions and Continued Occupancy Policy and Section 8 Administrative Plan are derived from the following:

Code of Federal Regulations 24 CFR Parts 5, 882, 887,888, 960, 982, 983 & 984 Quality Housing and Work

Responsibility Act Sections 507,508,513,514 & 523

### **Admissions and Continued Occupancy Policy**

In 2016, the RHA Board of Commissioners approved a revised Admission and Continued Occupancy Policy after a comprehensive review of the document by staff. In 2016 RHA contracted with a consultant to revise the Admission and Continued Occupancy Policy, the Public Housing Lease, and Housing Choice Voucher Administrative Plan. The recommended revisions were adopted by the RHA Board of Commissioners and the ACOP is reviewed and updated at least annually to reflect changes in HUD policies and regulations and whenever RHA is proposing any significant changes. All documents are available to the public at RHA's Administrative offices located at 675 W. Main Street, Rochester, New York 14611.

The PHA has added the required HOTMA language to the ACOP in accordance with the HUD PIH Notice 2023-27. The PHA will implement prior to the deadline of January 1, 2025.

Rules and Regulation

ATTACHMENT 3	
ROCHESTER HOUSING AUTHORITY	
STATEMENT OF FINANCIAL RESOURCES	
Income (Receipts) from Public Housing	
HUD Operating Funds	\$10,282,180.00
Tenant Rental Income	\$7,650,258.00
HUD Capital Funds	\$7,829,710.82
Investment and Other Income	\$2,638,107.00
Total Public Housing Income	\$28,400,255.82
Income (Receipts) from Housing Choice Voucher and Other Tenant  Based Assistance (Section 8, Mod. Rehab., Shelter + Care, etc.)	
HAP	\$87,413,274.54
Investment & Other	\$1,454,597.00
<b>Total HCV and Other Tenant Based Funding Income</b>	\$88,867,871.54
Combined Public Housing, HCV and	
Other Tenant Based Resources	\$117,268,127.36
All other Income Sources from State and Local Programs; and	\$1,600,123.00
Non-elimination Central Office Cost Center Income	\$2,575,420.00
Grand Total Resources available to RHA	\$121,443,670.36

### **ATTACHMENT 4**

### **Rochester Housing Authority – Rent Determination**

The Rochester Housing Authority (RHA) operates both Public Housing and Section 8 Programs.

### RHA has set the following rent policies for the Housing Choice Voucher Program.

- 1. RHA is retaining the calculation of the participant's contribution at the greatest of 30% of adjusted income, 10% of annual gross income, or welfare shelter rent.
- 2. RHA is only using statutory income exclusions in the calculation of adjusted income at this time.
- 3. RHA will set its Regular Payment Standards at 90 110% of the current area Fair Market Rents in most census tracts within the City of Rochester. For units located in the City of Rochester in census tracts with poverty rates below 20% and in all Monroe County Towns, the Exception Payment Standards may be set up to 10% percent higher than the current Regular Payment Standards. This higher Payment Standard for low-poverty areas is to help promote the deconcentration of poverty and provide greater housing opportunities in low-poverty areas. Payment Standards will be reviewed annually and determined by the current Fair Market Rent, program funding, voucher utilization, and waitlist. In the surrounding four counties, in which we have limited participation, the Payment Standards will be equal to the Regular Payment Standard.
- 4. RHA provides the Earned Income Disallowance in accordance with HUD regulation.
- 5. The minimum rent for Section 8 youcher holders is set at \$50.00.

### RHA has set the following rent policies for the Public Housing Program.

- 1. RHA is retaining the calculation of rent payment at the greater of 30% of adjusted monthly income, 10% of monthly gross income, or welfare shelter rent.
- 2. RHA is only using statutory income exclusions in the calculation of adjusted income at this time.
- 3. As an incentive to help our residents increase their income, RHA will not increase rent due to an increase in employment income until the next annual recertification. The resident has to report the increase in income within ten days of the change.
- 4. The minimum rent is set at \$50.00.

### **Choice of Rent Determination**

Public Housing residents may either choose a formula-based rent or a pre-set Fair Market Rent or "FMR" (formerly referred to as "Flat Rent"). At admission, and in each succeeding

year in preparation for their annual re-examination, each family is given the choice of having their rent determined under the formula method or having their rent set at the FMR for their unit.

### **Fair Market Rent (FMR)**

Families who opt for the FMR described above will be required to go through the income re-examination process once every three years, rather than the annual review required under the formula-based method.

Families who opt for the FMR may request to have a re-examination and return to the formula-based method at any time for any of the following reasons: i.e., the family's income has decreased; the family's circumstances have changed, increasing their expenses for childcare, increase in medical care expenses; or other circumstances creating a hardship on the family such that the formula method would be more affordable.

- The current FMR rates were revised in 2021 for the calendar year 2022 and will be reviewed for 2023 when published by HUD.
- The Board approved the proposed Fair Market Rent policy that took effect on October 1, 2014, due to new legislation approved by Congress.
   The Rochester Housing Authority amended its fair market rent policies to comply with the statutory changes contained within Public Law 113 76, the Fiscal Year 2014 Appropriation Act.

RHA will set the (flat) fair market rent rental amounts each year for each public housing unit that complies with the requirement that all FMRs be set at no less than 80 percent of the applicable Fair Market Rent (FMR) adjusted, if necessary, to account for reasonable utility costs. The new FMR amount will apply to all new program admissions effective 10/1/14. For current program participants who pay the FMR (flat) amount, the new FMR amount will be offered, as well as the income-based rental amount, at the next annual rental option.

RHA will place a cap on any increase in a family's rental payment that exceeds 35 percent and is a result of changes to the FMR rental amount as follows:

- Multiply the existing FMR (flat) rental payment by 1.35 and compare that to the updated FMR (flat) rental amount.
- RHA will present two rent options to the family as follows:
  - o the lower of the product of the calculation and the updated FMR rental amount: and
  - o the income-based rent.

### Formula Based Rent

Public Housing residents may also base their rent on an income-based formula. Under the formula-based rent, the total tenant payment is equal to the highest of 10% of monthly gross income, 30% of adjusted monthly income, or welfare rent.

The incomes of all residents that pay a formula-based rent must be re-examined on an annual basis or when required by HUD.

Each year at the time of the annual re-examination, families paying a formula-based rent may select to pay the FMR amount instead of completing the re-examination process.

Development Name	FAIR MARKET RENT INVENTORY	2024 Fair Market Rent\$	2025 Large Sites Gross Fair Market Rent \$
Atlantic Avenue	One Bedroom	\$ 840	\$ 919
Atlantic Avenue	Three Bedroom	\$ 1,264	\$ 1,376
	Two Bedrooms	\$ 1,046	\$ 1,142
Bay-Zimmer Townhouse	Three Bedrooms	\$ 1,264	\$ 1,376
Day-Zimmer Townhouse	Four Bedrooms	\$ 1,393	\$ 1,514
	Five Bedrooms	\$ 1,602	\$ 1,740
Bond-Hamilton Townhouses	Three Bedrooms	\$ 1,264	\$ 1,376
Bronson Court	Two Bedrooms	\$ 1,046	\$ 1,142
Dronson Court	Three Bedrooms	\$ 1,264	\$ 1,376
Capsule Dwellings	Three Bedrooms	\$ 1,264	\$ 1,376
Danforth East	Zero Bedroom	\$ 750	\$ 818
Damortii East	One Bedroom	\$ 840	\$ 919
Danforth West	Zero Bedroom	\$ 750	\$ 818
Damorth West	One Bedroom	\$ 840	\$ 919
Glenwood Gardens	One Bedroom	\$ 840	\$ 919
	Two Bedrooms	\$ 1,046	\$ 1,142
Holland Townhouses	Three Bedrooms	\$ 1,264	\$ 1,376
	Four Bedrooms	\$ 1,393	\$ 1,514
<b>Hudson-Ridge Tower</b>	One Bedroom	\$ 840	\$ 919
Jonathan Child Apartments	One Bedroom	\$ 840	\$ 919
Kennedy Tower	One Bedroom	\$ 840	\$ 919
Lake Tower	One Bedroom	\$ 840	\$ 919
Lena Gantt Estates	One Bedroom	\$ 840	\$ 919
Lena Ganti Estates	Two Bedrooms	\$ 1,046	\$ 1,142
Lexington Court	One Bedroom	\$ 840	\$ 919
Learngton Court	Two Bedroom	\$ 1,046	\$ 1,142
Seneca Manor	Three Bedrooms	\$ 1,264	\$ 1,376
Townhouses	Four Bedrooms	\$ 1,393	\$ 1,514
	Two Bedrooms	\$ 1,046	\$ 1,142
Tubman Estates	Three Bedrooms	\$ 1,264	\$ 1,376
	Four Bedrooms	\$ 1,393	\$ 1,514
University Tower	Zero Bedroom	\$ 750	\$ 818
CHITCIDILY TOWCI	One Bedroom	\$ 840	\$ 919



Unit#	Unit Address	Project	# Bedroom	Current 2024 FMR	Proposed 2025 Gross FMR
140	Adams St	10	3	\$ 1,264	\$ 1,376
142	Adams St	10	3	\$ 1,264	\$ 1,376
140-1/2	Adams St	10	2	\$ 1,046	\$ 1,142
142-1/2	Adams St	10	2	\$ 1,046	\$ 1,142
20	Alberta St	3	3	\$ 1,264	\$ 1,376
22	Alberta St	3	3	\$ 1,264	\$ 1,376
114	Aldine St	33	4	\$1,393	\$ 1,514
18	Alexander St	3	4	\$1,393	\$ 1,514
485	Alexander St	3	2	\$ 1,046	\$ 1,142
485	Alexander St	3	1	\$ 840	\$ 919
485	Alexander St	3	1	\$ 840	\$ 919
67	Alford St	50	4	\$1,393	\$ 1,514
67	Alphonse St	33	2	\$ 1,046	\$ 1,142
421	Alphonse St	3	5	\$ 1,602	\$ 1,740
61	Amsterdam St	50	3	\$ 1,264	\$ 1,376
54	Argo Park	10	3	\$ 1,264	\$ 1,376
56	Argo Park	10	3	\$ 1,264	\$ 1,376
16	Arklow St	3	3	\$ 1,264	\$ 1,376
14A	Arklow St	36	2	\$ 1,046	\$ 1,142
14B	Arklow St	36	2	\$ 1,046	\$ 1,142
873	Arnett Blvd	50	4	\$1,393	\$ 1,514
11	Asbury St	10	4	\$1,393	\$ 1,514
12	Athens St	36	4	\$1,393	\$ 1,514
4	Atkinson Court	10	2	\$ 1,046	\$ 1,142
8	Atkinson Court	10	2	\$ 1,046	\$ 1,142
12	Atkinson Court	10	4	\$1,393	\$ 1,514
16	Atkinson Court	10	3	\$ 1,264	\$ 1,376
20	Atkinson Court	10	4	\$1,393	\$ 1,514
24	Atkinson Court	10	4	\$1,393	\$ 1,514
28	Atkinson Court	10	2	\$ 1,046	\$ 1,142
32	Atkinson Court	10	2	\$ 1,046	\$ 1,142
141	Avenue A	36	3	\$ 1,264	\$ 1,376
143	Avenue A	36	3	\$ 1,264	\$ 1,376
438	Avenue A	33	5	\$ 1,602	\$ 1,740
66	Avenue A DN	10	3	\$ 1,264	\$ 1,376
66	Avenue A UP	10	3	\$ 1,264	\$ 1,376
985	Avenue D	10	4	\$1,393	\$ 1,514
270	Averill Ave	33	2	\$ 1,046	\$ 1,142
272	Averill Ave	33	2	\$ 1,046	\$ 1,142
199	Avery St	55	3	\$ 1,264	\$ 1,376

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Unit #	Unit Address	Project	# Bedroom	Current 2024 FMR	Proposed 2025 Gross FMR
746	Clifford Ave.	36	3	\$ 1,264	\$ 1,376
11	Coleman Terr	50	3	\$ 1,264	\$ 1,376
104	Congress Ave	50	3	\$ 1,264	\$ 1,376
140	Conkey Ave	36	3	\$ 1,264	\$ 1,376
142	Conkey Ave	36	3	\$ 1,264	\$ 1,376
622A	Conkey Ave	3	3	\$ 1,264	\$ 1,376
622B	Conkey Ave	3	3	\$ 1,264	\$ 1,376
111	Cottage Street	55	3	\$ 1,264	\$ 1,376
18	Council St.	36	4	\$ 1,393	\$ 1,514
158	Curtis St	55	3	\$ 1,264	\$ 1,376
46	Cutler St	50	4	\$ 1,393	\$ 1,514
131	Dakota St	50	3	\$ 1,264	\$ 1,264
217	Dakota St	50	3	\$ 1,264	\$ 1,264
68	Danforth St.	3	4	\$ 1,393	\$ 1,514
24	Dejonge St.	3	4	\$ 1,393	\$ 1,514
39	Delamaine	50	3	\$ 1,264	\$ 1,264
39	Delmar St.	3	2	\$ 1,046	\$ 1,142
41	Delmar St.	3	2	\$ 1,046	\$ 1,142
16	Denver St	50	3	\$ 1,264	\$ 1,264
15	Diringer Place	33	2	\$ 1,046	\$ 1,740
34	Dix St	50	3	\$ 1,264	\$ 1,264
214	Dodge St	50	3	\$ 1,264	\$ 1,264
15	Dorset St	55	3	\$ 1,264	\$ 1,264
47	Dorset St	59	3	\$ 1,264	\$ 1,264
179	Dove St	50	4	\$ 1,393	\$ 1,514
2252	E Main St	33	3	\$ 1,264	\$ 1,264
216	Edinburgh	8	3	\$ 1,264	\$ 1,264
218	Edinburgh	8	3	\$ 1,264	\$ 1,264
220	Edinburgh	8	3	\$ 1,264	\$ 1,264
37	Eiffel Pl.	3	3	\$ 1,264	\$ 1,264
43	Eiffel Place	33	3	\$ 1,264	\$ 1,264
24	Elba St	3	2	\$ 1,046	\$ 1,142
26	Elba St	3	2	\$ 1,046	\$ 1,142
32	Elba St	3	2	\$ 1,046	\$ 1,142
34	Elba St	3	2	\$ 1,046	\$ 1,046
30	Ellicott Street	33	3	\$ 1,264	\$ 1,264
25	Elmdorf	33	3	\$ 1,264	\$ 1,264
56	Elmdorf	33	4	\$ 1,393	\$ 1,514
4	Elser Terrace	33	3	\$ 1,264	\$ 1,264
13	Englert St	36	3	\$ 1,264	\$ 1,264
14A	Englert St	33	3	\$ 1,264	\$ 1,264
14B	Englert St	33	3	\$ 1,264	\$ 1,142

Unit #	Unit Address	Project	# Bedroom	Current 2024 FMR	Proposed 2025 Gross FMR
68	Epworth Street	8	3	\$ 1,264	\$ 1,264
42	Essex St.	36	2	\$ 1,046	\$ 1,142
44	Essex St.	36	2	\$ 1,046	\$ 1,142
67A	Evergreen St	33	3	\$ 1,264	\$ 1,264
67B	Evergreen St	33	3	\$ 1,264	\$ 1,514
2	Fenwick St	3	5	\$ 1,602	\$ 1,740
35	Ferncliffe Dr	3	2	\$ 1,046	\$ 1,142
37	Ferncliffe Dr	3	2	\$ 1,046	\$ 1,142
41A	Ferncliffe Dr	3	1	\$ 840	\$ 919
41B	Ferncliffe Dr	3	1	\$ 840	\$ 919
59	Fillmore St	50	4	\$ 1,393	\$ 1,514
179	Fillmore St	55	3	\$ 1,264	\$ 1,264
98	Fillmore Street	33	4	\$ 1,393	\$ 1,264
128	Fillmore Street	33	3	\$ 1,264	\$ 1,393
130A	First St	3	2	\$ 1,046	\$ 1,142
130B	First St	3	2	\$ 1,046	\$ 1,142
45	First St.	36	3	\$ 1,264	\$ 1,264
49	First St.	36	3	\$ 1,264	\$ 1,264
460	Flint St	3	3	\$ 1,264	\$ 1,264
35	Floverton St.	2A	3	\$ 1,264	\$ 1,264
37	Floverton St.	2A	3	\$ 1,264	\$ 1,264
51	Fourth St.	33	3	\$ 1,264	\$ 1,264
308	Fourth St.	36	3	\$ 1,264	\$ 1,264
6	Fromm Place	10	3	\$ 1,264	\$ 1,264
8	Fromm Place	10	3	\$ 1,264	\$ 1,264
10	Fromm Place	10	3	\$ 1,264	\$ 1,264
12	Fromm Place	10	3	\$ 1,264	\$ 1,264
14	Fromm Place	10	3	\$ 1,264	\$ 1,264
16	Fromm Place	10	3	\$ 1,264	\$ 1,264
18	Fromm Place	10	3	\$ 1,264	\$ 1,264
20	Fromm Place	10	3	\$ 1,264	\$ 1,264
47	Galusha St.	3	4	\$ 1,264	\$ 1,264
129	Garfield St	55	3	\$ 1,264	\$ 1,264
659	Genesee St	3	4	\$ 1,393	\$ 1,514
13	Gladys St.	33	4	\$ 1,393	\$ 1,514
16	Glasser Street	33	4	\$ 1,393	\$ 1,514
101	Glendale Park	50	4	\$ 1,393	\$ 1,514
538	Glide St	50	3	\$ 1,264	\$ 1,264
790	Glide St	50	3	\$ 1,264	\$ 1,264
96	Grafton St	57	3	\$ 1,264	\$ 1,264
17	Halford St	50	2	\$ 1,046	\$ 1,142
255	Hamilton St Dn	8	3	\$ 1,264	\$ 1,264

Unit #	Unit Address	Project	# Bedroom	Current 2024 FMR	Proposed 2025 Gross FMR
255	Hamilton St Up	8	3	\$ 1,264	\$ 1,264
1	Harris St.	10	5	\$ 1,602	\$ 1,740
382	Hawley Street	10	3	\$ 1,264	\$ 1,264
384	Hawley Street	10	3	\$ 1,264	\$ 1,264
15	Helena St.	10	4	\$ 1,264	\$ 1,514
237	Henrietta St	10	3	\$ 1,264	\$ 1,264
14	Henry St.	10	3	\$ 1,264	\$ 1,264
16	Henry St.	10	3	\$ 1,264	\$ 1,264
18	Henry St.	10	3	\$ 1,264	\$ 1,264
20	Henry St.	10	3	\$ 1,264	\$ 1,264
14-1/2	Henry St.	10	3	\$ 1,264	\$ 1,264
18-1/2	Henry St.	10	3	\$ 1,264	\$ 1,264
233	Herald St	55	3	\$ 1,264	\$ 1,264
118	Hobart St	58	4	\$ 1,393	\$1,393
98	Hobart Street	10	4	\$ 1,393	\$ 1,514
246	Holland St	58	2	\$ 1,046	\$ 1,142
250	Holland St	58	2	\$ 1,046	\$ 1,142
1	Hollister St.	10	3	\$ 1,264	\$ 1,264
1	Hollister St.	10	3	\$ 1,264	\$ 1,264
5	Hollister St.	10	3	\$ 1,264	\$ 1,264
7	Hollister St.	10	3	\$ 1,264	\$ 1,264
9	Hollister St.	10	3	\$ 1,264	\$ 1,264
30	Hollister St.	36	3	\$ 1,264	\$ 1,264
32	Hollister St.	36	3	\$ 1,264	\$ 1,264
5/1/2002	Hollister St.	10	3	\$ 1,264	\$ 1,264
609	Humboldt St	33	3	\$ 1,264	\$ 1,264
53	Irondequoit St.	3	3	\$ 1,264	\$ 1,264
35	Isabelle St	59	3	\$ 1,264	\$ 1,264
188	Jefferson	10	3	\$ 1,264	\$ 1,264
200	Jefferson	10	3	\$ 1,264	\$ 1,264
31	Jerold St	55	4	\$ 1,393	\$ 1,514
51	Jerold St	58	2	\$ 1,046	\$ 1,142
53	Jerold St	58	2	\$ 1,046	\$ 1,142
98	Jones Ave. #1	3	1	\$ 1,046	\$ 919
98	Jones Ave. #2	3	2	\$ 1,046	\$ 1,142
98	Jones Ave. #3	3	1	\$ 840	\$ 919
98	Jones Ave. #4	3	1	\$ 840	\$ 919
47-A	Judson Street	8	3	\$ 1,264	\$ 1,264
47-B	Judson Street	8	3	\$ 1,264	\$ 1,264
156	Kenwood	10	2	\$ 1,046	\$ 1,142
158	Kenwood	10	2	\$ 1,046	\$ 1,142
Unit #	<b>Unit Address</b>	Project	# Bedroom	Current 2024 FMR	Proposed 2025 Gross FMR

Unit #	Unit Address	Project	# Bedroom	Current 2024 FMR	Proposed 2025 Gross FMR
176	N Union St	36	4	\$ 1,393	\$ 1,514
375	N LeMoyne	55	3	\$ 1,264	\$ 1,264
751	N Goodman St	3	3	\$ 1,264	\$ 1,514
28	Moulson St	55	3	\$ 1,264	\$ 1,264
223	Mohawk Street	33	3	\$ 1,264	\$ 1,264
155	Milton St	55	3	\$ 1,264	\$ 1,264
14	Miller St.	3	3	\$ 1,264	\$ 1,264
60	Michigan St	55	3	\$ 1,264	\$ 1,264
160	Merriman St	10	5	\$ 1,602	\$ 1,740
66	Merrimac St.	10	3	\$ 1,264	\$ 1,264
64	Merrimac St.	10	3	\$ 1,264	\$ 1,264
62	Merrimac St.	10	3	\$ 1,264	\$ 1,264
60	Merrimac St.	10	3	\$ 1,264	\$ 1,264
58	Merrimac St.	10	3	\$ 1,264	\$ 1,264
9 (29)	McFarlin St.	2A	3	\$ 1,264	\$ 1,264
7 (27)	McFarlin St.	2A	3	\$ 1,264	\$ 1,264
1083	Maple St	58	2	\$ 1,046	\$ 1,142
95	Manchester St	55	3	\$ 1,264	\$ 1,264
57	Magnolia St	3	2	\$ 1,046	\$ 1,142
55	Magnolia St	3	2	\$ 1,046	\$ 1,142
519	Magee Ave	58	4	\$ 1,393	\$ 1,514
363	Lyceum Street	10	3	\$ 1,264	\$ 1,264
105	Lux St	55	3	\$ 1,264	\$ 1,264
60	Lozier St	3	3	\$ 1,264	\$ 1,264
201	Longview Terr	55	3	\$ 1,264	\$ 1,264
8	Lochner Place	33	2	\$ 1,046	\$ 1,142
54	Lincoln St.	10	2	\$ 1,046	\$ 1,142
39	Lincoln St.	2A	3	\$ 1,264	\$ 1,264
33	Lincoln St.	2A	3	\$ 1,264	\$ 1,264
287	Lincoln Ave	50	3	\$ 1,264	\$ 1,264
244	Lincoln Ave	50	3	\$ 1,264	\$ 1,264
595	Lexington Ave.	2A	2	\$ 1,046	\$ 1,142
593	Lexington Ave.	2A	2	\$ 1,046	\$ 1,142
69	Lenox St.	36	4	\$ 1,393	\$ 1,514
46	Laser St	58	3	\$ 1,264	\$ 1,264
82	Lansdale Street	10	3	\$ 1,264	\$ 1,264
68	Lang St.	33	2	\$ 1,046	\$ 1,142
66	Lang St.	33	2	\$ 1,046	\$ 1,142
356	LaGrange Ave	50	4	\$ 1,393	\$ 1,514
37	Kirkland Rd.	3	3	\$ 1,264	\$ 1,264
25	Kirkland Rd	3	3	\$ 1,264	\$ 1,264
21	Kirkland Rd	3	3	\$ 1,264	\$ 1,264

Unit #	Unit Address	Project	Bedroom	FMR	FMR
	·		#	\$ 1,264 Current 2024	Proposed 2025 Gross
83	Roslyn Street Roycroft Dr	50	3	\$ 1,264 \$ 1,264	\$ 1,264
46 289	Rosemary Dr	50 33	3	\$ 1,264 \$ 1,264	\$ 1,264
205B	Rohr St	36	2	\$ 1,046	\$ 1,142 \$ 1,264
205A	Rohr St	36		\$ 1,046	\$ 1,142
170	Rohr St	36	3 2	\$ 1,264 \$ 1,046	\$ 1,264 \$ 1,142
168	Rohr St	36	3	\$ 1,264	\$ 1,264
14	Rodenbeck	33	3	\$ 1,264	\$ 1,264
13	Rodenbeck	10	2	\$ 1,046	\$ 1,142 \$ 1,264
25	Rockland Park	10	3	\$ 1,264	\$ 1,264
904	Ridgeway Ave	50	4	\$ 1,393	\$ 1,514
265	Richard St	33	4	\$ 1,393	\$ 1,514
261	Reynolds Street	10	4	\$ 1,393	\$ 1,514
259	Reynolds Street	10	4	\$ 1,393	\$ 1,514
195	Reynolds Street	10	4	\$ 1,393	\$ 1,514
162	Reynolds Street	3	3	\$ 1,264	\$ 1,264
45	Reliance St	50	3	\$ 1,264	\$ 1,264 \$ 1,264
220B	Rauber St	3	2	\$ 1,046	\$ 1,142
220A	Rauber St	3	2	\$ 1,046	\$ 1,142
119	Post Ave	58	3	\$ 1,264	\$ 1,264
125	Portage St	50	3	\$ 1,264	\$ 1,264 \$ 1,264
121	Portage St	55	3	\$ 1,264	\$ 1,264
17	Planet Street	55	3	\$ 1,264	\$ 1,264
66	OK Terrace	2A	4	\$ 1,264	\$ 1,514
62	OK Terrace	2A	4	\$ 1,393	\$ 1,514
36	Ohio St.	3	3	\$ 1,264	\$ 1,514
1113	Norton St.	2A	3	\$ 1,264	\$ 1,264
1111	Norton St.	2A	3	\$ 1,264	\$ 1,264
765	Norton St.	36	3	\$ 1,264	\$ 1,264
763	Norton St.	36	3	\$ 1,264	\$ 1,264
74	Northview Terr	55	3	\$ 1,264	\$ 1,264
53	Northview Terr	50	3	\$ 1,264	\$ 1,264
29	Norris Drive	10	3	\$ 1,264	\$ 1,142
27	Norris Drive	10	2	\$ 1,046	\$ 1,264
25	Norris Drive	10	3	\$ 1,264	\$ 1,264
59	Normandy Ave	58	4	\$ 1,393	\$ 1,514
28	Nichols Street	33	3	\$ 1,264	\$ 1,264
22	Nelson St	58	3	\$ 1,264	\$ 1,264
182B	N Union St	3	2	\$ 1,046	\$ 1,142
182A	N Union St	3	3	\$ 1,264	\$ 1,142
162B	N Union St	36	2	\$ 1,046	\$ 1,142
162A	N Union St	36	3	\$ 1,264	\$ 1,264

Unit#	<b>Unit Address</b>	Project	Bedroom	FMR	FMR
			#	Current 2024	Proposed 2025 Gross
121	Sunset St	50	3	\$ 1,264	\$1,264
57	Stanley St. Stanton Street	10	3	\$ 1,264 \$ 1,264	\$ 1,264
15	Stanley St.	36 36	3	\$ 1,264 \$ 1,264	\$ 1,264
			3	·	\$ 1,314
264 8	St Casimir St St. Jacob St.	50 36	4	\$ 1,264 \$ 1,393	\$ 1,514
31	Somerset St.	3	5	\$ 1,602	\$ 1,740 \$ 1,264
	Somerset St.	3		\$ 1,264	· ·
84		50	3	\$ 1,264 \$ 1,264	\$ 1,314
408	Sixth St. Somerset St	50	3	\$ 1,264 \$ 1,264	\$ 1,264 \$ 1,514
125	Sixth St.	36	4	\$ 1,393	\$ 1,514 \$ 1,264
265	Sixth St	50	3	\$ 1,264	\$ 1,264 \$ 1,514
	Shepard St	10		\$ 1,393	\$ 1,142 \$ 1,264
72			4		
139 141	Shelter Street Shelter Street	10	2	\$ 1,046	\$ 1,142
82	Shelter Street		2	\$ 1,046	\$ 1,142
	Shelter St. Shelter St.	36 36	2	\$ 1,046	\$ 1,142
78			2	\$ 1,046	\$ 1,142
785 787	Seward Street Seward Street	10	2	\$ 1,046	\$ 1,142
			2	\$ 1,264 \$ 1,046	\$ 1,264
734	Seward Street Seward Street	10	3		\$ 1,264
519	Seward Street Seward Street	10	3	\$ 1,264 \$ 1,264	\$ 1,264
513	Seward Street	10	3	\$ 1,264 \$ 1,264	\$ 1,264
878	Seward St Seward St	3	3		\$ 1,264
817	Selye Terr Seward St	50	3	\$ 1,264 \$ 1,264	\$ 1,264
441	Selve Terr	55	3	\$ 1,264 \$ 1,264	\$ 1,264
214	Salva Tarr	55	3	·	\$ 1,264
235	i	33	3	\$ 1,264 \$ 1,264	\$ 1,264
96	Sawyer Street Sawyer Street	10	3	\$ 1,264 \$ 1,264	\$ 1,264
535 55	Sawyer Street	50 33	3	\$ 1,264 \$ 1,264	\$ 1,264
76 535	Sawyer St	55	3	\$ 1,264	\$ 1,264 \$ 1,264
31	Santee St.	36	3	\$ 1,264	\$ 1,264 \$ 1,264
29	Santee St.	36	3	\$ 1,264	\$ 1,264
146	Salina St	58	2	\$ 1,046	\$ 1,142
144	Salina St	58	2	\$ 1,046	\$ 1,142
138	Salina St	58	2	\$ 1,046	\$ 1,142
136	Salina St	58	2	\$ 1,046	\$ 1,142
40	Salina St	50	4	\$ 1,393	\$ 1,514
1133	S Plymouth	50	3	\$ 1,264	\$ 1,264
1131	S Plymouth	50	3	\$ 1,264	\$ 1,264
573	S Goodman St	3	4	\$ 1,393	\$ 1,514
	Rugby Avenue	33	3	\$ 1,264	\$ 1,264

Unit #	Unit Address	Project	Bedroom	FMR	Proposed 2025 Gross FMR
109	Weld St	36	4 #	\$ 1,393 Current 2024	\$ 1,514
26	Weld St	2A	3	\$ 1,264	\$ 1,264
24	Weld St	2A	3	\$ 1,264	\$ 1,264
123	Weeger St.	36	2	\$ 1,046	\$ 1,046
24	Waverly Place	10	3	\$ 1,264	\$ 1,264
22	Waverly Place	10	3	\$ 1,264	\$ 1,264
20	Waverly Place	10	3	\$ 1,264	\$ 1,264
29	Watkins	10	4	\$ 1,393	\$ 1,393
44	Warsaw St	58	2	\$ 1,046	\$ 1,142
396	Waring Rd.	2A	4	\$ 1,393	\$ 1,514
394	Waring Rd.	2A	4	\$ 1,393	\$ 1,514
100	Villa St	50	3	\$ 1,264	\$ 1,264
11	Veteran St.	2A	4	\$ 1,393	\$ 1,514
9	Veteran St.	2A	4	\$ 1,393	\$ 1,514
18	Truesdale St	56	3	\$ 1,264	\$ 1,264
383	Troup Street	10	4	\$ 1,393	\$ 1,514
381	Troup Street	10	4	\$ 1,393	\$ 1,514
329	Troup Street	10	4	\$ 1,393	\$ 1,514
328	Troup Street	10	3	\$ 1,264	\$ 1,264
326	Troup Street	10	3	\$ 1,264	\$ 1,264
324	Troup Street	10	3	\$ 1,264	\$ 1,264
322	Troup Street	10	3	\$ 1,264	\$ 1,264
223	Troup Street	10	3	\$ 1,264	\$ 1,264
221	Troup Street	10	3	\$ 1,264	\$ 1,264
219	Troup Street	10	3	\$ 1,264	\$ 1,264
217	Troup Street	10	3	\$ 1,264	\$ 1,264
186	Troup Street	10	3	\$ 1,264	\$ 1,264
184	Troup Street	10	2	\$ 1,046	\$ 1,142
182	Troup Street	10	2	\$ 1,046	\$ 1,142
292-296	Tremont St 6	10	4	\$ 1,393	\$ 1,514
292-296	Tremont St 5	10	4	\$ 1,393	\$ 1,514
292-296	Tremont St 4	10	4	\$ 1,393	\$ 1,514
292-296	Tremont St 3	10	4	\$ 1,393	\$ 1,514
292-296	Tremont St 2	10	4	\$ 1,393	\$ 1,514
292-296	Tremont St 1	10	4	\$ 1,393	\$ 1,514
1A	Thomas Street	10	3	\$ 1,264	\$ 1,264
1	Thomas Street	10	3	\$ 1,264	\$ 1,264
3A	Thomas St.	10	3	\$ 1,264	\$ 1,264
3	Thomas St.	10	3	\$ 1,264	\$ 1,264
162B	Third St	3	3	\$ 1,264	\$ 1,514
162A	Third St	3	3	\$ 1,264	\$ 1,142
43	Teralta St	50	3	\$ 1,264	\$ 1,264

				1	
64A	Weld St	3	2	\$ 1,046	\$ 1,264
64B	Weld St	3	3	\$ 1,264	\$ 1,142
76A	Weld St	36	2	\$ 1,046	\$ 1,142
76B	Weld St	36	2	\$ 1,046	\$ 1,142
70	Wellington Ave	58	2	\$ 1,046	\$ 1,142
72	Wellington Ave	58	2	\$ 1,046	\$ 1,142
99	Wellington Ave	3	4	\$ 1,393	\$ 1,514
261	West Ave.	3	3	\$ 1,264	\$ 1,264
127	Weyl St.	36	3	\$ 1,264	\$ 1,264
597	Wilkins St	50	3	\$ 1,264	\$ 1,264
347	Wilkins St.	10	3	\$ 1,264	\$ 1,264
347-1/2	Wilkins St.	10	3	\$ 1,264	\$ 1,264
59	Wilton Terr	50	3	\$ 1,264	\$ 1,264
190	Winterroth St	50	3	\$ 1,264	\$ 1,264
293	Wisconsin St	55	3	\$ 1,264	\$ 1,264
34	Wolfert Terr	55	3	\$ 1,264	\$ 1,264
76	Woodlawn St	36	2	\$ 1,046	\$ 1,142
78	Woodlawn St	36	2	\$ 1,046	\$ 1,142
51	Woodward St.	36	2	\$ 1,046	\$ 1,142
51-1/2	Woodward St.	36	2	\$ 1,046	\$ 1,142
134A	York St	36	2	\$ 1,046	\$ 1,142
134B	York St	36	2	\$ 1,046	\$ 1,142
5	Zimmer St	56	3	\$ 1,264	\$ 1,264
7	Zimmer St	56	3	\$ 1,264	\$ 1,264
13	Zimmer St	56	3	\$ 1,264	\$ 1,264
15	Zimmer St	56	3	\$ 1,264	\$ 1,264
21	Zimmer St	56	3	\$ 1,264	\$ 1,264
23	Zimmer St	56	3	\$ 1,264	\$ 1,264

## **Operation and Management**

The Rochester Housing Authority has the following Policies that govern our operations:

- Admissions and Continued Occupancy Policy
- Housing Choice Voucher Administrative Plan
- Homeownership Plan
- Family Self Sufficiency (FSS) Action Plan
- Grievance Procedure
- Procurement Policy
- Personnel Policy
- Section 3 Plan

Copies of these policies are available at **675 West Main Street**, **Rochester**, **New York 14611**. The Rochester Housing Authority operates the following programs:

Program	Brief Description
Public Housing	2,178 units of Public Housing owned by RHA.
Housing Choice Voucher*	10,389 Section 8 vouchers are available through RHA. The HCV program provides rental assistance on behalf of participants in the private rental market.
Permanent Supportive Housing w/Rental Assistance	Provides rental assistance to formerly homeless individuals or families to live in privately-owned units throughout Monroe County (previously known as Shelter Plus Care). RHA can assist up to 236 families through this program.
Comp Grant/Capital Fund	Funds for addressing capital needs improvements to Public Housing management, sites, buildings, systems, and units.
Moderate Rehabilitation / Single Room Occupancy	RHA administers 38 units in partnership with the YWCA of Rochester, 175 N Clinton Ave, to provide rental assistance to eligible formerly homeless individuals.
ROSS Resident Services Delivery	A program that assists Public Housing residents in becoming self-sufficient
Family Self-Sufficiency	A program that assists RHA Residents/ Participants in becoming self-sufficient.
Elderly Service	Assists elderly residents who are aging in place.
ROSS Services Coordinators	Coordination of support services to assist residents in becoming self-sufficient.

Within the Housing Choice Voucher Program, RHA administers the following voucher types:

* Voucher Type	Description
Tenant-Based Vouchers	The subsidy is issued to the participant. Assistance can be used on any qualifying and approved rental unit.
Project-Based Vouchers	The subsidy is issued to the unit. Provides owners with a long-term commitment to promote creating new/renovated units.
Rental Assistance Demonstration (RAD) Project-based Vouchers	A new HUD demonstration program that provides the opportunity for Public Housing units and privately owned affordable rental units with expiring contracts with HUD to convert to Project-Based Voucher Assistance or PBRA.
Enhanced Vouchers	Vouchers to tenants living in a housing development that has converted from affordable housing to market rent housing.
Mainstream 5-Year Vouchers	Targeted funding to assist elderly or non-elderly disabled families.
HUD-VASH Vouchers	Veterans Assistance Supportive Housing, administered in partnership with the local VA Office.
Family Unification Vouchers	To prevent the separation of or to assist with the reunification of families.
Designated Housing Vouchers	Targeted funding to assist non-elderly disabled families.
Homeownership Vouchers	Provides housing assistance for homeownership expenses.
Portable Vouchers	To assist current voucher holders who move out of or into the Rochester community.

RHA's Housing Choice Voucher and other Rental Assistance Programs Utilization (as of 3/15/2024):

3/13/2024).							
Program	Allocation	Leased Units	0/1 BR	2 BR	3 BR	4 BR	5BR+
Housing Choice Vouchers	10,385	8,580	3,54	2,451	2,021	503	61
RHA Portable Vouchers living outside of	79	79	29	24	19	7	0
Moderate Rehab	38	32	32	0	0	0	0
Permanent Supportive	236	191	115	36	32	7	1
TOTALS	10,738	8,882	3,720	2,511	2,072	517	62

**Listing of RHA's Public Housing inventory** 

AMP	Development	Studio	1bdrm	2bdr m	3bdrm	4bdrm	5bdrm	Development Total	AMP Totals
112	Glenwood	-	124	-	-	-	-	124	240
	Jones Ave	-	3	1	-	-	-	4	
	Lexington Court	-	57	55	-	-	-	112	
113	Lake Tower	-	208	-	-	-	-	208	341
	Harriett Tubman	-	-	68	51	14	-	133	
222	Danforth Tower West	16	82	-	-	-	-	98	305
1	Danforth Tower East	18	79	-	-	-	-	97	
	Jonathan Child	-	30	-	-	_	_	30	
	Kennedy Tower	_	80	-		-	-	80	
	· •			ı					
334	Atlantic TH	_	12	-	12	-	-	24	189
	Bronson Court	_	-	20	19	-	-	39	
	University Tower	50	76		-	_	-	126	
									I
361	Capsule	-	_	- 1	16		-	16	239
	Scattered Sites Z-1	_	_	5	24	10	_	39	
	Scattered Sites Z-2	_	2	16	19	14	2	53	
	Scattered Sites Z-3	_	-	34	72	24	1	131	
					.=				I
442	Hudson Ridge Tower	_	318	-	-	-	_	318	396
	Seneca Manor TH	-	-	- /	52	26		78	270
								, ,	
554	Holland TH	_	_	26	36	10	_	72	216
	Lena Gantt		70	30	-	-	_	100	213
	Bay-Zimmer		-	16	16	10	2	44	
								<u> </u>	<u> </u>
562	Scattered Sites Z-4	-	-	5	34	8	2	49	167
	Scattered Sites Z-5	_	2	26	76	13		118	
					. 0	15		1	I
997	Carlson Commons		-	15	13	5	2	35	35
								1 22	1
998	Plymouth Manor		_	10	16	7	8	35	35
770	= 1J 1110 0001 11101101			10	10	,			
999	Anthony Square	-	_	4	11	_	_	15	15
,,,	- maiony oquato			•				1	1.0
RHA	Гotal	84	1143	331	461	141	18	2178	2178

<sup>\*</sup>The number of units was changed due to the RAD Conversion unit being removed. Count all units (on or offline).

## **Smoke-Free Public Housing**

To improve the health of Public Housing Tenants and to reduce maintenance costs associated with the rehabilitation of units effective, 10/1/13, all Public Housing units were designated as smoke-free units. Tenants are no longer permitted to smoke in their units or common areas. In complexes and buildings, tenants have designated smoking areas outside where smoking will be permissible. Scattered site residents are required to smoke outside of the unit.

The U.S. Department of Housing and Urban Development's (HUD) final rule to restrict smoking in public housing went into effect on February 2, 2017. This rule requires public housing agencies (PHAs) administering public housing to adopt a smoke-free policy by July 30<sup>th</sup>, 2018, which is 18 months from the effective date of the final rule. The policy must prohibit the use of "prohibited tobacco products" in all indoor areas, including individual living units, common areas, administrative office buildings, and outdoor areas within 25 feet of those areas.

The rule prohibits smoking in all outdoor areas within 25 feet of housing and administrative office buildings or the PHA's property boundary in situations where the boundary is less than 25 feet. This 25-foot perimeter includes balconies, porches, decks, and any other outdoor space within 25 feet. Any RHA-designated smoking areas will be located outside the 25-foot buffer zone. Due to COVID restrictions, residents are also reminded of social distancing when in designated smoking areas.

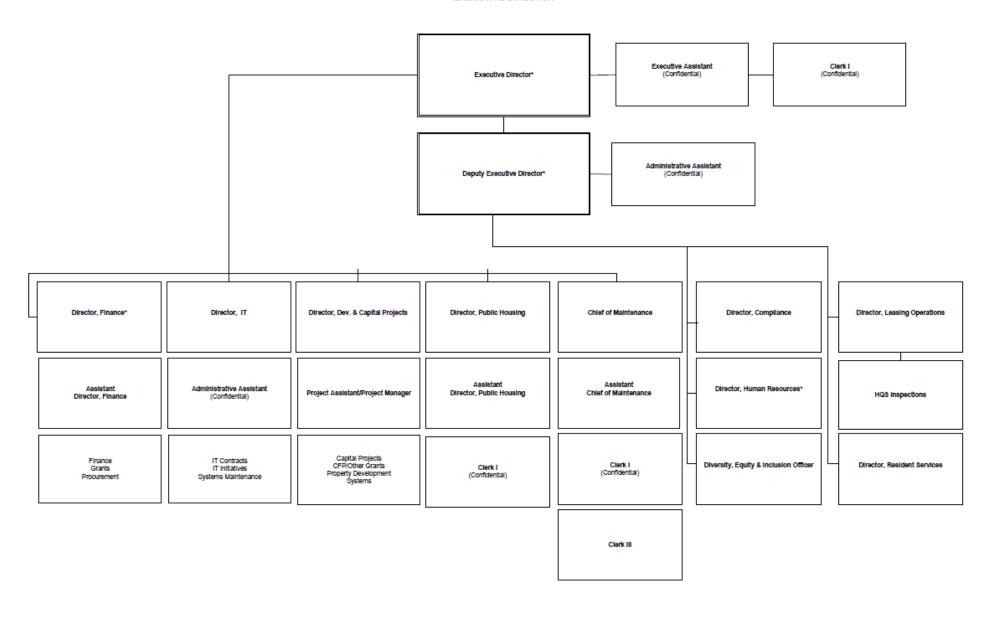
RHA has assisted other PHAs with their smoke-free housing efforts.

## **Rochester Housing Authority – Grievance Procedure**

The RHA Board of Commissioners reviewed and approved the revised Grievance Procedure for Public Housing after a comprehensive review of the document by RHA Compliance staff. To comply with **ADA**, informal hearings will be conducted both in-person and remotely, using RHA's online video conferencing service provider. RHA will provide a telephone number to the resident if unable to access via Zoom, Teams, or other video platforms. This Grievance Procedure for Public Housing is available to the public at RHA's administrative offices at 675 West Main Street or on the RHA website. The Admissions and Continued Occupancy Policies has been revised to reflect the changes. RHA will make every effort to accommodate a resident's request for a hearing.

The RHA Board of Commissioners reviewed and approved the revised Grievance Procedure for Leasing Operations Voucher Programs HCV, PBV, and Permanent Supportive Housing (Shelter Plus Care), after a comprehensive review of the document by the Compliance staff. Hearings will be conducted in-person and remotely, using the online video conferencing service provider: Zoom, Teams, or via telephone. RHA will provide a telephone number to the participant if unable to access via Zoom, Teams, or other video platforms. The Leasing Operations Department Grievance Procedures are detailed in the RHA Administrative Plan. This document is available to the public at RHA's administrative offices at 675 West Main Street or on the RHA website.

#### EXECUTIVE DIRECTOR



## **Rochester Housing Authority – Designated Housing**

The Rochester Housing Authority's Designated Housing Plan was approved by HUD in 2022 for two years, and RHA will reapply in December 2024.

The following locations are eligible for the elderly only:

- 2	The following focutions are engineer for the electry only.								
	AMP	PROJECT #	NUMBER OF UNITS	PROPERTY					
	222	02	97	Danforth Tower East					
	222	02	98	Danforth Tower West					
	112	15	124	Glenwood Gardens					
	442	18a	318	Hudson-Ridge Tower					
	222	39	30	Jonathan Child Apartments					
	222	01	80	Kennedy Tower					
- 1									

The following locations are eligible for elderly, near elderly, and disabled families:

334	02	20	Atlantic Avenue (one-bedroom units)
334	14	126	University Tower
113	22	208	Lake Tower
112	34	57	Lexington Court (one-bedroom units)
554	38	70	Lena Gantt (one-bedroom units)

This action was consistent with our needs assessment and Consolidated Plan Annual Action Plan

## **Rochester Housing Authority Community Service and Self-Sufficiency Programs**

The Quality Housing and Work Responsibility Act (QHWRA) of 1998 require that housing authorities set forth in their Annual Plan a description of their Community Service and Self-Sufficiency Programs.

RHA will continue to administer a Family Self-Sufficiency (FSS) program. Under this program, families set goals, and a service coordinator works with them and helps them achieve their goals over a 5-year period. Some families' goals include homeownership. The FSS grant funds three case manager positions. Per HUD guidelines, one case manager position is funded for the first 25 families and an additional case manager for each additional 50 families. There is currently no waiting list for either Section 8 or public housing families to participate. Outreach to both HCV and PH residents consists of management referrals, brochures, advertisements, and door-to-door outreach.

RHA will continue to assist participants in the FSS program to achieve their homeownership goals by providing participants with support such as financial counseling, building escrow savings accounts, linking them with local grant opportunities, and other local homeownership programs.

RHA will also continue to utilize funding from a Resident Opportunities and Self-Sufficiency (ROSS) Grant. This grant funds two Service Coordinators who assess the needs of residents of conventional Public Housing and coordinate available resources in the community to meet their needs. This program promotes local strategies to coordinate the use of assistance under the Public Housing program with public and private resources for supportive services and resident empowerment activities. These services enable participating families to increase earned income, reduce or eliminate the need for welfare assistance, make progress toward achieving economic independence, and reach housing self-sufficiency.

RHA intends to utilize using community service time to support RHA's site-based community centers as a satisfaction of their community service requirement.

The Housing Authority administers several programs that promote economic improvement and self-sufficiency.

- ROSS Service Coordinators
- Housing Choice Voucher/Public Housing Family Self-Sufficiency
- Homeownership Supportive Services

The Housing Authority administers a Senior Service Coordinator Program and works diligently with local agencies to promote service programs that are designed to support positive development for youth.

- Senior Service Coordinator
- FAFSA Fest
- Scholarship Informational Sessions
- Summer meals program for youth

• Summer camp programs for youth

The Housing Authority leases approximately one hundred thirteen (113) units to Family Service Communities of Rochester, which administers both an Enriched Housing and Assisted Living Program. RHA residents have preference and priority to these units if qualified. These services allow the Senior/disabled population to remain independent with support services. RHA has performed a program needs assessment with the specific intent to improve and expand the program.

RHA's Program Coordinating Committee (PCC) consists of members from area Agencies, Social Service Departments, City of Rochester staff, and residents. The objective of the Committee is to assist RHA in our endeavors to coordinate our programs through Community Collaborations and resources as well as to give RHA feedback, so we can better assist our residents in their goal of self-sufficiency. The PCC meets quarterly to ensure strong collaboration between the partner agencies.

## **Community Service Requirement**

The community service requirement was established by the QHWRA. The QHWRA requires all non-exempt adult public housing residents to participate in eight hours of community service and/or economic self-sufficiency activities per month. Exempt residents include those 62 or older, disabled individuals, primary caretakers of disabled individuals, individuals engaged in a minimum of 30 hours of work activities a week, and those in compliance with the requirements of a state TANF (welfare) program.

In order to meet the QHWRA requirements, RHA modified the Admissions and Continued Occupancy Policy (ACOP) to require language outlining the community service requirements. Applicable excerpts from the upcoming ACOP follow below:

#### **Continued Occupancy and Community Service General**

Each adult resident of the PHA, who is not exempt [24 CFR 960.603(a)] must:

- Contribute 8 hours per month of community service; or
- Participate in an economic self-sufficiency program (as defined in the regulations) for 8 hours per month; or
- Perform 8 hours per month of combined activities (community service and economic self-sufficiency programs).
- The required community service or self-sufficiency activity may be completed 8 hours each month or maybe aggregated across a year. Any blocking of hours is acceptable as long as 96 hours is completed by each annual certification of compliance [Notice PIH 2015-12].

#### **Exemptions**

#### Exempt Individual [24 CFR 960.601(b), Notice PIH 2015-12]

An exempt individual is an adult who:

- Is age 62 years or older.
- Is blind or disabled (as defined under section 216[i][l] or 1614 of the Social Security

Act), and who certifies that because of this disability s/he is unable to comply with the service provisions.

- Is a primary caretaker of such an individual.
- Is engaged in work activities (30 hours per week as the minimum number of hours to qualify for work activity exemption).
- Is able to meet requirements of being exempted under a state program funded under part A of title IV of the Social Security Act or under any other welfare program of the state in which the PHA is located, including a state-administered welfare-to-work program. This exemption applies to anyone whose characteristics or family situation meets the welfare agency exemption criteria and can be verified.
- Is a member of a family receiving assistance, benefits, or services under a state program
  funded under part A of title IV of the Social Security Act, or under any other welfare
  program of the state in which the PHA is located, including a state-administered welfareto-work program and the supplemental nutrition assistance program (SNAP), and has not
  been found by the state or other administering entity to be in noncompliance with such
  program.

## **Notification of Community Service Requirement**

RHA will provide the family with a copy of the Community Service Policy at lease-up, lease renewal, when a family member is determined to be subject to the community service requirement during the lease term, and at any time upon the family's request. The policy will notify the family that self-certification forms are subject to review by RHA.

On an annual basis, at the time of lease renewal, RHA will notify the family in the writing of the family members who are subject to the community service requirement and the family members who are exempt. If the family includes nonexempt individuals, the non-exempt family member will be referred for orientation where they will receive a list of agencies in the community that provide volunteer and/or training opportunities, as well as a documentation form on which they may record the activities they perform, and the number of hours contributed. The form will also have a place for a signature by an appropriate official, who will certify to the activities and hours completed.

#### **Volunteer Opportunities**

Community service includes performing work or duties in the public benefit that serve to improve the quality of life and/or enhance resident self-sufficiency, and/or increase the self-responsibility of the resident within the community.

An economic self-sufficiency program is one that is designed to encourage, assist, train, or facilitate the economic independence of participants and their families or to provide work for participants. These programs may include programs for job training, work placement, basic skills training, education, English proficiency, workfare, financial or household management, apprenticeship, and any program necessary to ready a participant to work (such as substance abuse or mental health treatment).

RHA will coordinate with social service agencies, local schools, and the human resources office in identifying a list of volunteer community service positions.

Together with the resident advisory councils, RHA may create volunteer positions such as hall monitoring, litter patrols, and supervising and record-keeping for volunteers.

Community services at profit-motivated entities, volunteer work performed at homes or offices of general private citizens, and court-ordered or probation-based work will not be considered eligible for community service activities.

## **Notification of Non-Compliance with Community Service Requirement (CSSR)**

The lease specifies that it is renewed automatically for all purposes unless the family fails to comply with the community service requirement. Violation of the service requirement is grounds for nonrenewal of the lease at the end of the twelve-month lease term, but not for termination of tenancy during the course of the twelve-month lease term [24 CFR 960.603(b)].

RHA may not evict a family due to CSSR noncompliance. However, if RHA finds a tenant is noncompliant with CSSR, the RHA must provide written notification to the tenant of the noncompliance, which must include:

- A brief description of the finding of non-compliance with CSSR.
- A statement that RHA will not renew the lease at the end of the current 12-month lease term unless the tenant enters into a written work-out agreement with the RHA, or the family provides written assurance that is satisfactory to RHA explaining that the tenant or other non-compliant resident no longer resides in the unit. Such as a written work-out agreement must include the means through which a non-compliant family member will comply with the CSSR requirement. [24 CFR 960.607(c) Notice PIH 2015-12].

The notice must also state that the tenant may request a grievance hearing on RHA's determination, in accordance with RHA's grievance procedures, and that the tenant may exercise any available judicial remedy to seek timely redress for nonrenewal of the lease because of RHA's determination.

## **Opportunity for Cure**

The family will have ten business days from the date of the notice of non-compliance to enter into a written work-out agreement to cure the noncompliance over the 12-month term of the new lease, provide documentation that the noncompliant resident no longer resides in the unit, or request a grievance hearing. If the family reports that a noncompliant family member is no longer residing in the unit, the family must provide documentation that the family member has actually vacated the unit before RHA will agree to continued occupancy of the family. Documentation must consist of a certification signed by the head of household as well as evidence of the current address of the family member that previously resided with them. If the family does not request a grievance hearing or does not take either corrective action required by the notice of noncompliance within the required ten business day timeframe, RHA will terminate the tenancy.

**Continued Noncompliance and Enforcement Documentation [24 CFR 960.607(b)]** 

Should a family member refuse to sign a written work-out agreement or fail to comply with the terms of the work-out agreement, RHA is required to initiate termination of tenancy proceedings at the end of the current 12-month lease (see 24 CFR 966.53(c)) for failure to comply with lease requirements. When initiating termination of tenancy proceedings, the RHA will provide the following procedural safeguards:

- Adequate notice to the tenant of the grounds for terminating the tenancy and for non-renewal of the lease.
- Right of the tenant to be represented by counsel.
- Opportunity for the tenant to refute the evidence presented by the PHA, including the right to confront and cross-examine witnesses and present any affirmative legal or equitable defense which the tenant may have; and,
- A decision on the merits.

## **Treatment of Income Changes Resulting from Welfare Program Requirements**

The policies that govern income changes for both the Public Housing Program and Voucher Programs are found in our Admissions and Continued Occupancy Policy, Administrative Plan, and FSS Action Plan.

In general, the RHA Admissions and Continued Occupancy Policy, Administrative Plan, and FSS Action Plan are derived from the following:

Code of Federal Regulations 24 CFR Parts 5, 882, 887,888, 960, 982, 983 & 984.

## Rochester Housing Authority - Public Safety and Security Services

RHA awarded contracts for Comprehensive Security Services to A.P. Safety & Security Corporation, Enterprise Security Consulting and Training, and Blackhawk Security and Investigations. These companies are responsible for all of RHA's public safety needs.

The goal is to provide a safe living environment for the residents of the RHA and surrounding neighbors. One of the specific objectives of RHA's contracts is to provide a visible presence at Authority sites and to organize safety programs in conjunction with residents and staff. Additionally, the intent is to administer programs that assist with crime reduction and illegal drug reduction. These programs focus on creating close ties with the resident population. Security programs are funded through RHA's Capital Fund Grants and general operating budget.

Through public safety programs, RHA has sought to lower the incidences of illegal drugs and criminal activity in public housing sites. While some neighborhoods surrounding RHA sites continue to be a problem and pose a very real threat to progress, continued security efforts are a priority.

## **RHA Office of Public Safety**

Security Services for RHA are coordinated by the Office of Compliance, and Public Safety. Public Safety's efforts are coordinated under the community-policing concept. Community Policing is a philosophy, management style, and organizational strategy that promotes pro-active problem solving and police-community partnerships to address the causes of crime, fear, and other community issues. The Office of Public Safety promotes regular, direct, and positive contact with residents and staff to foster positive relationships. Additionally, direct contact with the community provides security officers the opportunity to understand the community they serve. Security officers are encouraged to listen to residents' concerns and allow them to become involved in the solution. In the effort to reduce the use of illegal drugs and crime, residents must know they are an important factor in addressing the problem. Office of Public Safety is a crucial link in establishing the resident's trust and providing a good quality of life.

Public Safety coverage provides residents with several layers of contractual security services. Outlined below is a summary of the services provided. The summary also provides the primary hours in which the security activities are conducted. The day and time in which security services are provided are subject to change should problems in the developments arise.

## Security Services - Public Safety Officers/High Rise-Senior Sites

RHA provides residents with the services of Public Safety Officers. The officers are responsible for patrolling RHA's property and complexes for the elderly. Public Safety security officers are on duty in the evening hours, as determined by each site's needs. Security Officers patrol the stairwells and hallways to ensure they are safe and problem-free. The officers are also responsible for monitoring persons entering the building, ensuring entrances to the building are secure, and responding to security-related problems within the buildings. Public Safety Officers respond to resident problems and ensure the safety and security of the exteriors and parking lots of public housing properties.

The activities of Public Safety Officers are coordinated by a Patrol Supervisor.

## Public Safety Officers/Road Patrol-24 Hour

RHA provides a "high visibility patrol" concept through the use of Public Safety Officers. The Public Safety Officers/Road Patrols are part-time positions that are filled by Security Officers and/or off-duty Police Officers. The persons who serve in this capacity generally have several years of law enforcement or security service. The officers patrol RHA sites as much as 24 hours a day, and work in coordination with the Patrol Supervisor.

Public Safety Officers provide a more involved level of security service. they are expected to work with residents, RHA staff, and local law enforcement to solve security-related problems. The officers also provide patrol services as well as drug elimination and community policing activities.

Public Safety Officers are responsible for patrolling all RHA developments, including scattered site properties. Some are assigned to patrol cars. In warmer months, the officers may patrol RHA properties on bicycles or foot. The variation in patrolling tactics has proven to be effective in deterring drug dealers from establishing open-air drug markets on RHA property. It is anticipated that the high visibility of security patrols will prevent criminal activities in the surrounding communities from moving onto RHA properties.

An essential element of the Public Safety Officer's duties is to spend time talking with residents about the security of their complexes. Public Safety Officers will participate in resident association meetings and community events. A Patrol Supervisor attends the Police Citizen Interaction Committee's monthly meetings. Such interactions with residents are important in determining whether the security needs of residents are being addressed.

## Specialized Security and Professional Services 24-hour on-call

Specialized security services provide a variety of professional security services to support the needs of RHA management and security staff. Public Safety will work closely with the Rochester Police Department the circumstances if a situation warrants.

#### **Safety and Security**

The Security Consultant is responsible for security personnel. RHA staff members, in conjunction with the Security Consultant, work together to determine the security needs of RHA management and staff and to develop needed training.

The Security Consultant is responsible for conducting investigations of crimes that have occurred at RHA and/or coordinating such activities with the Rochester Police Department. In addition, the Security Consultant is responsible for reviewing daily activity reports and addressing any findings or problems that may have arisen during the prior evening.

The Security Consultant also reviews the activity reports to determine if there are any trends or hot spots of activity.

RHA has several resident-based Neighborhood Watch programs operating in its senior towers that includes RHA's Tenants on Patrol. RHA residents manage these programs, with RHA having an employee assigned as an administrative liaison for this program. The Security Consultant provides members with guidance and training about the administration of the program. The Security Consultant will also forward to RHA management and security any concerns or problems encountered by the resident watch programs.

## **Rochester Housing Authority – Pet Policy**

## Rochester Housing Authority - Assistive Animal and Pet Policy- Approved

The RHA pet policy was last updated in 2022. This policy allows for one pet per household in elderly/disabled locations with a deposit required of \$100.00 and/or one pet per household in RHA scattered sites/families with a required pet deposit of \$200.00. Security deposits are not charged for Assistive Animals/

This policy establishes the rules and conditions under which a pet may be kept in Rochester Housing Authority (RHA) developments in accordance with HUD 24 CFR § 5.350. The primary purpose of these rules is to establish reasonable requirements for the keeping of common household pets to provide a decent, safe, and sanitary environment for existing and prospective residents, RHA employees, and the public, and to preserve the physical condition of RHA property.

Individual developments may designate selected common areas as no-pet areas, provided that the rules governing these areas are reasonable and do not conflict with any Federal, State, or local law or regulation governing the owning and keeping of pets in dwelling accommodations (apartments), and the essential terms of this policy.

Violations of this policy shall be considered a violation of a material term of the lease. The development manager may require the removal of a pet upon violation of these rules or may commence eviction procedures. The appeal procedures that apply to other eviction actions, including the right to a grievance hearing, shall apply to violations of these rules.

Any animal found in RHA-owned or managed outdoor or common areas without a proper license, tags, and restraint shall be reported to the City of Rochester Animal Control Unit or other applicable authority for its removal.

Any resident wishing to obtain a new pet, or any new resident before moving in with a pet, must complete an application and obtain approval from Management.

The complete Assistive Animal and Pet policy is contained in RHA's Admissions and Continued Occupancy Policy, Chapter 10. Persons interested in reviewing the complete Assistive Animal and Pet policy may contact the Housing Authority to obtain a copy of the policy.

## **Rochester Housing Authority – Assistive Animal Policy**

**Assistive Animal Rules** 

The term "Assistive Animal" refers to service animals, therapy animals, emotional support animals, and companion animals.

Per HUD 24 CFR §5.303, this policy does not apply to Assistive Animals that reside in public housing properties. It does not limit or impair the rights of persons with disabilities or affect any authority the Rochester Housing Authority has under other legal provisions to regulate animals that assist persons with disabilities.

Management has established the Assistive Animal Rules to ensure that the property is maintained in a decent, safe, and sanitary manner and that all residents can live in peace and quiet comfort. The rules are applicable to residents who have been granted a reasonable accommodation request to house an assistive animal. Processing a request for an assistive animal is done in accordance with the RHA's reasonable accommodation and modification policy.

- A. A person with a disability is not automatically entitled to have a service animal. Reasonable accommodation requires that there is a relationship between the person's disability and his or her need for a service animal. [PH Occupancy Guidebook, p. 179]
- B. Before an assistive animal is permitted to live in the apartment, Management must verify the disability and/or need for an assistive animal. If the disability is not obvious or previously known, Management will verify, with a licensed medical professional, that there is a Nexus between both the presence of a disability and the need for an assistive animal.
- C. When the disability must be verified, the Management will request the following information:
  - a. the provider's professional opinion that the condition qualifies as a disability under federal law,
  - b. the provider's opinion that the assistive animal has been prescribed for treatment purposes and is necessary to help alleviate symptoms associated with the person's condition and/or to help the person use and enjoy the property and its services; and
  - c. the provider's description of what service(s) the animal will provide.
- D. Management will process the request as quickly as possible and will respond, in writing or in an equally effective manner, if necessary, within ten (10) business days after receiving all documentation from the resident and/or the verification source. If the request for the assistive animal is denied, the resident has the right to request an appeal meeting. The request must be made within ten (10) business days of the date of the notification of denial. If requested by the resident or his/her representative, the meeting will be conducted by a person who was not involved in the original decision to deny.
- E. The resident is not required to pay a pet deposit for the assistive animal since it is not considered a "pet." However, the resident is solely responsible for any damage to persons or property caused by his/her animal and for cleaning, fumigation, deodorizing, and emergency kenneling required because of the animal. These charges may be assessed at any time and are due within thirty (30) calendar days.
  - a. Expenses incurred for the upkeep of the animal that is considered a medical expense for those families who qualify for such a deduction. Such expenses include but are not limited to grooming, food, and veterinary care. Toys, treats, clothes, etc., are considered optional items and are not included as a medical expense. In accordance with federal requirements, Management will make the final determination regarding reasonable expenses.
- F. The animal must be registered with the Management Office before it is permitted to live in the apartment and annually thereafter. To register the animal, the resident must provide the following:

- a. Information sufficient to identify the animal.
- b. A certificate and rabies vaccination tag as proof that the animal has up-to-date rabies vaccinations or a certificate of exemption from rabies vaccinations from a licensed veterinarian who has determined that the vaccination will adversely affect the animal's health (required by New York State law).
- c. For dogs four months of age or older, license tags (required by New York State law).
- d. The name, address, and phone number of at least two (2) responsible parties who will serve as alternate caretakers for the animal if the resident is hospitalized, dies, is incapacitated, is incarcerated, or is otherwise unable to care for the animal.
- G. Management reserves the right to prohibit any animal from living in the apartment if Management has documented information that indicates:
  - a. Based on the resident's habits and practices, the resident will be unable to keep the animal in compliance with the rules and/or another lease requirement.
  - b. The animal poses a threat to the health or safety of other residents, guests, vendors, service providers, or property staff.
  - c. The animal would interfere with other residents' peaceful enjoyment of the property.
  - d. The presence of the animal would change the nature of the program or cause an undue financial and administrative burden. The resident has a history of animal neglect or abuse.
  - e. The resident will receive a notification if Management intends to prohibit the animal from living in the apartment. The notice shall state the basis for the action and shall be served on the resident. If it is discovered that there is an animal in the apartment without prior approval, the resident will be notified that the animal must be removed within seventy-two (72) hours. If the resident does not remove the animal as required, Management reserves the right to contact animal control to remove the animal. Any costs associated with the removal of the animal are the responsibility of the resident. Management is not responsible for the health or well-being of the animal in such circumstances.
  - f. Pets of a vicious or aggressive disposition will not be permitted. Any animal deemed to be potentially harmful to the health or safety of others, including attack or fight-trained dogs, will not be approved.
  - g. No animal may exceed twenty (20) pounds in weight or twenty (20) inches in height at maturity.
- H. All residents shall be fully and solely responsible for disposal of pet waste, both inside and outside of their apartment. Disposal must be made only by placing the pet waste in a sealed plastic bag and placing the bag in a dumpster or other place designated by the manager at the development. If pet owners do not properly dispose of pet waste, they shall be required to reimburse the housing authority for any expense involved in providing alternate waste disposal. Repeated failure by a resident to take responsibility for waste disposal shall be deemed a violation of the resident's obligations under the terms and conditions of his/her lease even if the resident has paid any charges involved. Failure to pick up pet waste in common areas will result in a thirty-five (\$35.00) pet waste removal charge per occurrence.
- I. Products that are commonly used to housetrain the animal must be disposed of daily. These items must be "double-bagged" using sealable plastic bags before they may be placed in the trash.
- J. The resident must change kitty litter and/or clean cages and other enclosures at least once per

week.

- K. The resident may be required to remove the animal from the property if the presence of the animal or actions of the owner causes unsanitary conditions in the apartment or any common area of the building and grounds.
- L. The resident is solely responsible for any damage to persons or property caused by his/her animal and for cleaning, fumigation, deodorizing, and emergency kenneling required because of the animal. These charges may be assessed at any time and are due within thirty (30) calendar days.
- M. The animal must wear a rabies vaccination tag. If it is discovered that the animal does not have a rabies vaccination, the resident will have ten (10) business days to remedy the situation or remove the animal.
- N. All dogs over the age of four (4) months must be licensed and wear license tags at all times. If the dog does not have the required license tags, the resident will have ten (10) business days to remedy the situation or remove the animal.
- O. The resident is responsible for the proper care of the animal.
  - a. If the resident's animal is ill or in poor health, it must not be taken into common areas of the building. And, depending on the nature of the illness, the resident may be required to remove the animal from the premises.
  - b. Residents who dispose of medications and/or use needles to give medicine to their animals must follow proper disposal guidelines.
  - c. Crates and cages must be kept in a decent, safe, and sanitary manner and must be of the appropriate size for the animal.
  - d. Animals are not permitted to be "penned" or "caged" on balconies or patios (if applicable) during the night or while the resident is away from the apartment. No screening, fencing, etc., may be added to any area on the property grounds. Animals must not be leashed or tied to any interior or exterior building fixture at any time.
  - e. No pet is to remain unattended, without proper care, for more than 24 hours. The resident shall designate one or more persons as an emergency contact that can tend to the pet if the resident is unable to do so. In instances where a pet appears to have been abandoned for more than 24 hours, and an emergency contact cannot be located, the Management shall report the matter to the Human Society of Rochester for the Prevention of Cruelty to Animals or other applicable authority for its removal. If necessary, Management will enter the apartment, as in an emergency, to rescue the animal.
  - f. Management reserves the right to contact animal control to remove the animal. Management will also contact the alternate caretaker listed in the animal's registration and require them to remove the animal if the resident is the sole household member and is unable, for any reason, to take care of the animal or has died, been incarcerated, been hospitalized, or has abandoned the apartment. Management is not responsible for the health or well-being of the animal, and any costs associated with the removal of the animal are the responsibility of the resident (or the resident's estate) in such circumstances.
- P. Cruelty to animals in any form is an offense punishable by imprisonment, fine, or both. Cruelty directed toward animals, if witnessed, should be immediately reported to Management, police, or local animal control. In addition, animals involved in gaming

(cockfighting, dogfights, etc.) are victims of abuse, and local animal control agencies and law enforcement (as appropriate) will be contacted to investigate any suspected instances of gaming and/or other abuse.

- Q. The pet/animal must always be under the control of a responsible adult.
  - a. The pet/animal must not be allowed outside the apartment unattended.
  - b. Dogs must be on a leash no longer than three (3) feet, and cats must be crated (if appropriate for the animal) while outside of the confines of the resident's apartment.
  - c. The pet/animal may not prevent other residents from the peaceful enjoyment of the property. The resident agrees to immediately remove the animal if its behavior is unruly or disruptive (i.e., barking, growling, running around, or making noise that would disturb other residents). The resident must take proper steps to restrain the animal. No pet/animal that bites, attacks, or demonstrates other aggressive behavior towards humans or other animals may be kept on the premises.
  - d. The pet/animal must not be allowed to jump on, impede or otherwise limit any property staff, vendor, resident, or guest's use of the property.
  - e. NOTE: Management may order the removal of the pet/animal from the premises if the pet/animal is out of control and the animal's handler does not take effective action to control it, or the pet/animal's behavior poses a direct threat to the health and safety of others. Upon notice, if the resident fails to remove the pet/animal, Management reserves the right to contact a local animal control organization to have them remove the pet/animal. Management is not responsible for the care or return of the pet/animal in these circumstances.
- R. If the resident has violated the assistive animal/pet rule Management may serve a written notice of the violation to the resident. The notice will contain a description of the rule(s) alleged to have been violated and a brief factual statement of how the violation was determined.
  - a. The resident will have ten (10) calendar days from the effective date of service of the notice to correct the alleged violation or to make a written request for a meeting to discuss it. If the resident makes a timely request for a meeting to discuss an alleged rule violation, Management will establish a mutually agreeable time and place for the meeting. The resident's failure to request a meeting or appear at a requested meeting may result in the termination of tenancy.
  - b. Management will issue a notice for the removal of the animal if the resident and Management are unable to resolve the violation at the meeting or it is determined that the resident has failed to correct the violation. If the resident does not remove the animal or correct the violation within the applicable time, Management may terminate tenancy terms of the lease and applicable regulations. Management may initiate these procedures at any time in accordance with the provision of applicable state or local laws.
- S. Residents are entitled to request a grievance hearing pursuant to the RHA Grievance Procedure with regard to any dispute they may have with the RHA arising under this policy. Applicants are entitled to request review if they disagree with RHA's decision under this policy pursuant to the procedures of the RHA Applicant Review Procedure.
- T. Requirements for Staff, Residents, and Other Members of the Community in Relation to Assistive Animals:
  - a. Do not touch or pet an assistive animal unless invited to do so.

- b. Do not feed an assistive animal.
- c. Do not deliberately startle an assistive animal.
- d. Do not separate or attempt to separate an owner from his or her assistive animal.
- e. Do not inquire for details about a person's disabilities. The nature of a person's disability is a private matter.
- f. Management may prohibit pets and/or assistive animals in certain locations due to health and safety restrictions designated for public use by RHA [Public Housing Ownership and Occupancy Guidebook, Section 2.2 Assistance Animals, Page 3-4].



# Certifications of Compliance with PHA Plan and Related Regulations (Standard, Troubled, HCV-Only, and High Performer PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

## PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the X 5-Year and/or\_\_\_Annual PHA Plan, hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 2025, in connection with the submission of the Plan and implementation thereof:

- The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
- The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable
  Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair
  Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the
  manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and
  91.425).
- 3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
- 4. The PHA provides assurance as part of this certification that:
  - The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
- The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
- 6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
- 7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
- 8. For PHA Plans that include a policy for site-based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

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- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in
  which to reside, including basic information about available sites; and an estimate of the period of time the applicant
  would likely have to wait to be admitted to units of different sizes and types at each site;
- Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a
  pending complaint brought by HUD;
- The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
- The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
- The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
- With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
- The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
- 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
- 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
- 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
- The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

PHA l	Name		PHA Number/H	A Code	
	Annual PHA Plan for Fiscal	Year 20			
X	5-Year PHA Plan for Fiscal Y	ears 2025 - 2030			
prosecute	certify that all the information stated herein false claims and statements. Conviction in	n, as well as any information nay result in criminal and/or c	rivil penalties. (18 U.S.C. 1001, 1	010, 1012; 31 U.S.C. 3729, 3802).	HUD will
	Executive Director: Shawn Burr	- 1/4 6	Name Board Chairman: Rosal	Lemarais	
Signature	& Su & L	3/K hozy	signature	pernacaus	Date

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form HUD-50077-ST-HCV-HP (3/31/2024)

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.



# Civil Rights Certification (Qualified PHAs)

Previous version is obsolete

U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB Approval No. 2577-0226 Expires 3/31/2024

#### Civil Rights Certification

#### **Annual Certification and Board Resolution**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan, hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning October 1, 2024 in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et sea.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.

Rochester Housing Authority	NY - 041
PHA Name	PHA Number/HA Code
I hereby certify that all the statement above, as well as any information provid false claims and statements. Conviction may result in criminal and/or civil per	ded in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute nalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)
Name of Executive Director: Shawn Burr  3/16/2024	Name of Board Chairperson: Rosalie Remarais
Signature Date	Signature Date
The United States Department of Housing and Urhan Development is authorized to c and regulations promulgated thereunder at Title 12, Code of Federal Regulations. R The information requested does not lend itself to confidentiality. The information is	collect the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., lesponses to the collection of information are required to obtain a benefit or to retain a benefit, s collected to emsure that PHAs carry out applicable civil rights requirements.
Public reporting burden for this information collection is estimated to average 0.16 sources, gathering, and maintaining the data needed, and completing and reviewing required to complete this form, unless it displays a currently valid OMB Control Nun	hours per response, including the time for reviewing instructions, searching existing data the collection of information. HUD may not collect this information, and respondents are not mber.

Page 1 of 1

form HUD-50077-CR (3/31/2024)

## **Rochester Housing Authority Annual Audit**

The Rochester Housing Authority Audit for Fiscal Year 2023-2024 is required to be submitted to the Department of Housing and Urban Development by June 2025. Once HUD has approved, the audited Financials will be available upon request.



## Rochester Housing Authority – Statement of Asset Management

The goal of Asset Management is to provide cost-efficient, quality housing that is professionally managed and maintained in the best interest of our residents. Several key modifications to the current RHA Management System have been implemented to achieve these goals:

- RHA has combined resources that manage and maintain all of the RHA's properties into portfolios that are either contiguous or close in geographical location. Each of these portfolios is managed as a separate entity. This project-based model, as opposed to the previous aggregate management style, creates a sense of ownership and allows for increased accountability through project-based budgeting.
- Project-based budgeting and reporting gives RHA the ability to analyze the housing stock's financial viability and position as it relates to the local market. Each portfolio's value can, therefore, be assessed on its own merits, and a more accurate determination can then be made in terms of future capital investment. This system also gives the RHA the ability to track the actual cost associated with operating each individual site. This resulting management and financial efficiencies will equate to cost savings and better use of RHA's operating funds.
- A proactive customer service focus is paramount to the success of the new Asset Management System. The current system of management has been restructured to provide increased support to the principal Property Manager. By removing the paperwork burden from the Property Manager, he or she now has the time to devote to management, communications, and public relations. Another key element of this reorganization will be the development of a career path for the current management staff. Several opportunities for advancement will be created, thus providing additional motivation for the staff to improve their level of management skills.
- Management also plays an integral role in identifying services and quality amenities that
  enhance the marketability of our housing stock. For RHA to continue its mission as the
  affordable housing of choice, we need to identify the services and amenities that are currently
  being provided by the private sector. This parity will allow us to keep the vacancy rate at HUDestablished acceptable levels or below.
- The Maintenance Department has also been restructured under Asset Management to meet the needs of the residents and RHA's customer service goals. A review of the current staff size indicated that the number of Maintenance personnel is below the were well within the 50 to 1 (units to the employee) HUD recommended ratio due to a shortage of staff. We found that the previous centralized structure did not adequately meet the needs of the Housing Authority or its residents. The Asset Management model required a site-based distribution of staff that now meets the needs of each complex, high-rise, or group of scattered sites. Each property has a somewhat unique set of needs that can be best satisfied with the correct number of on-site staff with the appropriate skill sets. By providing a better mix of staff talent (Senior Maintenance Mechanics, Maintenance Mechanic, Maintenance Laborers, etc.), the lesser trained employees are provided greater opportunities for on-the-job training by working directly with senior staff.

This plan also requires the addition of experienced, trained supervisors to work hands-on with Maintenance personnel, providing a greater level of support and guidance based on a supervisor to employee ratio. Accountability is drastically improved under the site-based model as employees at each site are responsible for the overall appearance, systems upkeep, and customer satisfaction at the site at which they are assigned. As employee skill sets are improved, larger challenges like

performing unit rehabs have been possible. By relying less on outside contractors, the housing authority will save time, reduce costs, and improve the control over the quality of the work performed. The mission of the Asset Management Model is to provide structure and focus to our daily decision-making and allows for staff to feel ownership of their projects. RHA may use Forced Account Labor to hire an experienced crew to turn vacant units in public housing.

The allowable management fees for RHA are as follows:

FEES	UNITS	AMOUNTS
Public Housing Management Fees	2,178	\$66.35
Public Housing Bookkeeping Fee	2,178	\$7.50
Public Housing Asset Management Fee	2,178	\$10.00
Section 8 Bookkeeping Fee	10,738	\$7.50
Section 8 Administrative Fee	10,738	\$12.00

## Program Update - Allocation of Units for Victims of Domestic Violence VAWA

## **Violence against Women Act (PIH 2017-08)**

This Act protects tenants and family members of tenants who are victims of domestic violence, dating violence, sexual assault, or stalking from being evicted or terminated from housing assistance based on acts of such violence against them. This provision applies to both Public Housing as well as Section 8 programs and owners renting to families under Section 8 rental assistance programs.

Any and all domestic violence information relating to the incident(s) must be retained in confidence by the Authority or the owner and must not be shared without the victim's consent. RHA may require verification of such abuse utilizing the HUD form 5382. VAWA informing notices will be provided for every denial of admission, every new admission, and every termination notice. The informing notices include a blank copy of HUD form -5382.

Each applicant/resident is informed that there is help available. RHA supplies each applicant/resident the telephone numbers for Willow Domestic Violence Center, National Domestic Violence Hotline, Rape, Abuse & Incest National Network's National Sexual Assault Hotline, and the National Center for Victims of Crime's Stalking Resource Center. RHA developed our informational letter with the collaboration of Empire Justice and Monroe County Legal Assistance Corp. An informational training session has been conducted by these agencies to educate and inform staff so that RHA may be better equipped to assist participants. Landlords in the voucher program are notified of VAWA requirements in the HUD-required tenancy addendum, which is Part C of the HAP contract.

## Demolition, Disposition, or Homeownership of Public Housing Units

RHA regularly examines its public housing units and development portfolio to evaluate whether they continue to meet the resident, and community needs and provide quality, safe, affordable housing. If, during RHA's review of its portfolio of units, it is determined additional units should be removed, the RHA would pursue their removal using one of HUD's predetermined methods as listed below.

#### **Demolition**

RHA may demolish public housing units that are obsolete as to physical condition, location, or other factors, making them unsuitable for housing purposes, and no reasonable program of modifications to the property is cost-effective. De minimis demolitions of up to 5 units every five years are allowed under 24 CFR Part 970. RHA intends to use Section 18 as part of its RAD and/or other preservation strategies.

All available operating subsidy, capital funds, and existing reserves at each location can be utilized in the conversion process, using all options available under RAD (e.g., rent bundling, §18, 25% PBVs, etc.) to maximize the future financial stability of each development. The Housing Authority may dispose of a portion of any project's units (and de minimis portions) through Section 18 and replace them with Project-Based Vouchers.

See Attachment- 20 for RHA's plans for public housing units that may be demolished.

#### **Disposition**

Disposition of public housing is permitted for any one of the following reasons:

- a change in the neighborhood, so the location is no longer conducive to residential use.
- the land the development is built on is sufficiently valuable that the development can be replaced at no cost to HUD.
- leasing the development to another entity, or transferring the title of the development via a sales contract,
- the development contains vacant land or non-dwelling structures that exceed the development's needs and/or is incidental to the continuing operation of the development.
- RHA determines that the disposition is consistent with its goals and the U.S. Housing Act of 1937.

Disposition is also allowed providing the properties are part of mixed-finance housing, developed in accordance with 24 CFP 941 (Subpart F). RHA plans to utilize HUD's Disposition tool as appropriate when evaluating the preservation strategies for its Public Housing units.

#### Homeownership

The Quality Housing and Work Responsibility Act (QHWRA) permits housing authorities, through Section 32 of the Housing Act of 1937, to make dwelling units available for purchase by low-income families as their principal residence. Units may be sold to current public housing residents, Section 8 participants, or other qualified persons.

RHA developed and implemented a Homeownership plan to reinvigorate a more robust homeownership program, increase the number of homeownership voucher holders, and implement a Section 32 Homeownership plan. Residents were surveyed in 2017, 2018 and 2021 for interest in purchasing RHA Public Housing units. Families who responded to the survey are assigned a ROSS coordinator who will create an Individualized Training and Implementation Plan (ITSP) for homeownership. RHA intends to perform a physical needs assessment of all potential Section 32 scattered-site units and determine which single-family units will be best designated for homeownership. RHA may use capital funds and/or operating reserves to renovate designated public housing scattered site homes prior to being offered for homeownership. RHA is in the process of preparing several dwellings that have been identified as future homeownership opportunities. RHA will prepare and submit appropriate applications to HUD and submit to the Special Applications Center (SAC). RHA has created a pipeline of potential homebuyers and Resident Services staff is working with each resident to meet eligibility requirements. RHA intends to partner with community resources to aid in assisting residents to achieve homeownership.

## **Conversion of Public Housing**

The Rental Assistance Demonstration (RAD) program was developed by HUD as a tool to convert public housing properties to Section 8 rental assistance. The conversion allows public housing agencies to access additional funding to make needed physical improvements to properties.

The Rochester Housing Authority certifies that its RAD conversion sites comply with all applicable site selection requirements as set forth: at 24 CFR § 983.57, and in accordance with any additional applicable guidance provided by HUD. Site selections is suitable from the standpoint of facilitating and furthering full compliance with the applicable provisions of Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Executive Order 11063, and HUD regulations issued pursuant thereto. Site selection is consistent with the requirements of the Fair Housing Act, Title VI of the Civil Rights Act of 1964 including implementing regulations at 24 CFR § 1.4(b)(3), Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR § 8.4(b)(5), and the Americans with Disabilities Act. All appropriate procedures have been followed.

RHA received a Commitment to enter into a Housing Assistance Payment (CHAP) from HUD for the conversion of Parkside Apartments. The property was converted in mid- 2020. The property is owned and managed by RHA (through a property management agreement). RHA's instrumentality, Parkside Apartments I, LLC, is the signatory for the HAP contract with HUD. Several resident meetings were held where residents were informed of their rights, and the staff was available to answer questions.

RHA has closed on its RAD conversion of the Federal Street Townhouses-Scattered Sites, which includes surrounding scattered-site buildings. The plan is to demolish the structures at Federal Street and build new units. The scattered sites have been evaluated (by an independent consultant) to determine the extent of rehabilitation necessary to meet the needs of our families. Three of the scattered site units will be demolished and a new constructed unit will take its place. RHA closed on this project in May of 2023. Residents have been relocated and will have the right of first refusal to move back into a unit in the project. Construction began in the Fall of 2023 and will continue until Spring 2025. Residents have the right to return and those that wish to do so will as soon as the units are approved for occupancy.

RHA closed on its Parliament Arms Apartments and Fairfield Village Apartments – Parliament-Fairfield, in the Fall of 2023. Each site and most of the units will undergo substantial renovation and other units demolished and replaced with new construction to add accessible units and community space to each site. Anticipated completion date is Spring 2025.

RHA has received a CHAP from HUD for the RAD conversion of Glenwood Gardens. This project is in the design review phase and will result in demolition of existing buildings, with new construction of multi-story buildings, multi-unit, and single-family units. There will be an increase in the total number of units at this site in effort to provide more affordable housing opportunities for the community. RHA will be partnering with LifeSpan to provide supportive housing at this site.

RHA continues to examine its public housing units and development portfolio to determine if other developments would benefit from a RAD conversion. RHA plans to submit additional RAD applications in accordance with its development timeline. Other potential sites are Holland Townhouses, Harriet Tubman Estates, Seneca Manor Townhouses, Danforth east and West Towers,

Lake Tower, Lexington Court Apartments, University Tower, Bay-Zimmer Apartments, Jonathan Childs Apartments, and Hudson Ridge Tower.

## **Mandatory Conversion**

RHA does not have any public housing stock which is subject to mandatory conversion.

## **Voluntary Conversion**

RHA intends to perform an assessment of all its Public Housing Properties and will determine whether or not it will submit a voluntary conversion application.



## **Rochester Housing Authority – Homeownership**

HUD published the Final Rule for the Housing Choice Voucher Homeownership Option on September 12, 2000. RHA's Board of Commissioners, at its December 2000 meeting, approved an amendment to the RHA Administrative Plan, which initiated the Homeownership program. Originally the Board of Commissioners approved 100 vouchers to be designated for homeownership. In May of 2012, the Board of Commissioners approved an additional ten vouchers bringing the total to 110. RHA's Admin Plan, revised in March 2017, added an additional 90 vouchers, bringing the current total to 200 vouchers.

RHA's first homeownership closing took place on December 8, 2001. To date, there have been a total of 241 closings. RHA partners with local agencies to assist families in achieving their homeownership goals. 20 families closed in 2020, 17 in 2021, 12 in 2022, 21 in 2023, and 10 in 2024. RHA is committed to growing the Homeownership pipeline and has increased outreach to public housing residents and Section 8 program participants. A pipeline of candidates with homeownership goals has been created to increase utilization.

RHA has developed and implemented a homeownership plan that includes Section 32 Homeownership. This comprehensive plan outlines the requirements and guidelines of the program. Currently, RHA has 7 Public Housing residents who are eligible to own their home and 32 in the pipeline. RHA has performed physical needs assessments on each of the seven homes and identified repairs are complete. RHA is in the process of completing the Special Applications Center (SAC) application. In addition to the Plan, RHA is developing a post homeownership program to assist families in maintaining their homes and ensuring homeowners that they have somewhere to go for assistance when they need it.

Residents were surveyed in 2017, 2018 and 2021 for interest in purchasing RHA Public Housing units. Families who responded to the survey are assigned a ROSS coordinator who will create an Individualized Training and Implementation Plan (ITSP) for homeownership. RHA intends to perform an assessment of all its public housing scattered-site units and determine which single-family units will be designated for homeownership. Current residents will be given the first option to purchase the home. RHA may use capital funds and/or operating reserves to renovate designated public housing scattered site homes prior to being offered for homeownership. RHA is also working with the City of Rochester to identify ways to work together in furthering each agency's homeownership programs and goals.

### **ATTACHMENT 18**

### **Statement of Capital Improvement Needs**

Current and future capital needs of RHA's Public Housing developments are identified by Public Housing Staff, Maintenance staff, NSPIRE inspections, REAC inspections, physical needs assessments, and Public Housing residents.

The Development/Capital Projects Department meets periodically with Property Managers, Chief of Maintenance, Building Maintenance Supervisors, residents, and a sub-committee of the Board of Commissioners, the Project Planning Committee, to identify priorities and monitor the progress of capital improvement projects. A Resident Relations Committee has been formed which includes resident council presidents from all councils and meets monthly to discuss issues, gather input and provide information.

New Public Housing and affordable units may be developed in partnership with other public or private agencies using Capital Funds, grant funds, proceeds from sales of existing public housing property, low-income housing tax credits, and mixed financing.

For more detail of capital projects identified by staff, residents, and the Board of Commissioners, please refer to Attachment 21- Certifications: *Annual Statement /Performance and Evaluation Report* 50075.1, *Capital Fund Program Five-Year Action Plan* 50075.2, and *the Capital Fund CFP Amendment*.

### **ATTACHMENT 19**

### Rochester Housing Authority – Housing Needs Assessment

The Quality Housing and Work Responsibility Act (QHWRA) of 1998 require that housing authorities set forth in their Annual Plan a Needs Assessment of the housing needs of their jurisdiction and an analysis of the Public Housing and Housing Choice Voucher waiting lists.

At the end of this section is the information contained in the Housing Needs portion of the City of Rochester 2034 Comprehensive Plan, Monroe County 2020-2024 Strategic Plan, and the 2022 Annual Plan. It shows there is a need for additional affordable housing resources in our city and county and an increase in household income. Also included are data and related tables that provide an analysis of RHA's waiting lists.

The Rochester Housing Authority is part of an effort undertaken by the City of Rochester, the Towns of Greece, Irondequoit, and suburban Monroe County, the State of New York, and other local housing organizations to address jurisdictional affordable housing needs. While RHA cannot meet all of the needs identified here, in accordance with our goals included in this Plan, RHA will work to address some of the identified needs by using appropriate resources to maintain and preserve its existing housing stock. When appropriate and feasible, RHA will apply for additional grants and loans from federal, state, and local sources, including private sources that will allow the agency to increase the community's affordable housing. RHA intends to work with our local partners, the City of Rochester, the Towns of Greece and Irondequoit and suburban Monroe County, and local affordable housing developers to try to meet these identified needs.

In fiscal year (2025), RHA expects to receive \$93,000,000 for our existing programs. These resources are used to house people and continue to improve the quality of the existing housing stock. Certain other opportunities and resources may change over the coming year if program changes are beyond our control.

The information on the waiting list was analyzed in the following manner. A computer program was developed to find and list the applicants on the RHA Public Housing and Housing Choice Voucher waiting lists. The results were screened to ensure that applicant records had complete information. The information was then sorted by bedroom size, income distribution, elderly, disabled, racial/ethnic breakdown, and the average length of time to receive housing.

### ANALYSIS OF THE PUBLIC HOUSING WAITING LIST-1/29/25

<b>Total Number of Families on the Waiting List</b>	3426	
Bedroom Breakdown:		
Studio/One Bedroom Applicants	1209	36%
Two-Bedroom Applicants	1203	35%
Three Bedroom Applicants	682	20%
Four Bedroom Applicants	297	9%

The five-bedroom waitlist is currently closed. Due to the limited availability of these units, vacancies are offered exclusively to internal transfers at this time.

Income Distribution of Applicants: \*RHA does not collect income data on pre-applications.

Number of Applicant Families Headed by an Elderly Person	288	8%
Number of Applicant Families with a Person with a <u>Disability</u>	931	27%
Racial/Ethnic Breakdown:		
White	831	24%
Black	1620	47%
American Indian/Native Alaskan	24	<1%
Asian	24	< 1%
Hawaiian/Other Pacific Islander	113	3%
Multi-Racial/Declined to Report	814	24%
Hispanic	830	24%
Non-Hispanic	2450	72%
*Average Length of Time to Receive Housing (in months)	43 Months	

Prospective tenants provide the above information on their application intake form. However, this information is subject to change until verified during the housing intake process.

<sup>\*</sup>The average wait time varies by bedroom size, with the longest wait time currently for two-bedroom units. At present, an applicant on the two-bedroom waitlist can expect an average wait time of 60 months before being contacted. The overall average wait time for all bedroom sizes is calculated from the date RHA receives the original application to the date the applicant is contacted from the top of the waitlist for eligibility determination.

# ANALYSIS OF THE SECTION 8 WAITING LIST 03/13/2023

Total Number of Families on the Waiting List	1,511,	
Bedroom Breakdown:		
Unknown Bedroom Size Applicants*	3,525	99
One Bedroom Applicants	11	.3%
Two-Bedroom Applicants	9	.3%
Three Bedroom Applicants	11	.3%
Four Bedroom Applicants	1	<.1
Five + Bedroom Applicants	0	0%

Starting with the December 2019 waitlist opening, applicants to the Section 8 program are not assigned a voucher size until the time of voucher issuance.

Income Distribution of Applicants: \*RHA does not collect income data on preapplications.

Number of Applicant Families Headed by an Elderly Person	131	8.7%
Number of Applicant Families with a Person with a <u>Disability</u>	357	23.6%
Racial/Ethnic Breakdown:		
White	961	22.7%
Black	2,158	51.1%
American Indian/Native Alaskan	16	.4%
Asian	13	.3%
Hawaiian/Other Pacific Islander	135	3.2%
Multi-Racial/Declined to Report	938	22.2%
Hispanic	322	21.3%
Non-Hispanic	3,391	76.2%

Prospective tenants provided the above information on their application intake form. This information is subject to change until verified during the housing intake process.

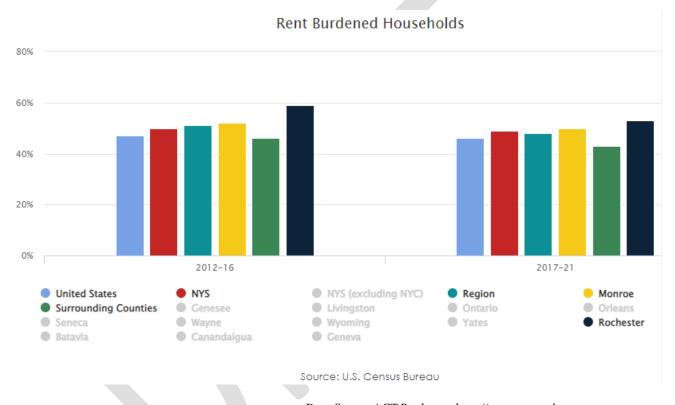
Average Length of Time to Receive Housing (in months) 23 Months\*

# **Summary of Housing Needs**

<sup>\*</sup>Average length of time is based upon the time from the date of the original application was received by RHA until the date the applicant is contacted from the top of the waitlist to determine eligibility.

The County of Monroe 2020-2024 Strategic Plan and 2020 Annual Action Plan, the City of Rochester 2034 Comprehensive Plan, and ACT Rochester (An Initiative of Rochester Area Community Foundation) each provide detailed housing need assessments/data that focus on the low-income families, elderly, homeless and disabled populations of the community.

According to ACT Rochester, in 2014-18, 50% of rental units in the region had residents whose housing costs were above the affordability threshold. That was higher than the national level of 47% and the same as the state rate. The region's rate did not substantially change from 2009-13 to 2014-18. The City of Rochester contained 40% of the rentburdened units in the region. Overall, 57% of units in Rochester had residents whose housing costs were above affordable levels. This was higher than any county in the region and well above Canandaigua (40%), Geneva (49%), and Batavia (45%). The rental cost burden at the county level was lowest in Wyoming (34%) and highest in Livingston (54%).



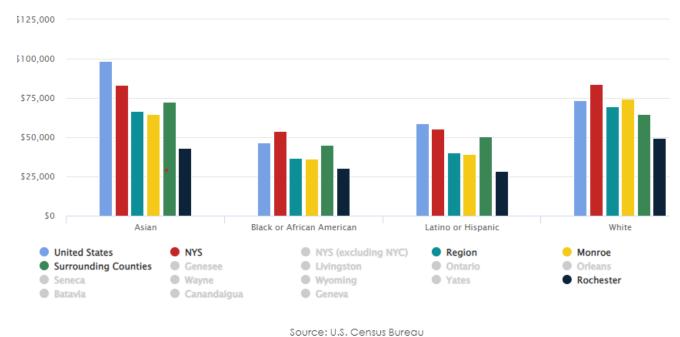
Data Source ACT Rochester http://www.actrochester.org

### **ACT Rochester** reports the following:

- In 2017-21, Monroe renters spent 50% of their income on rent, slightly higher than the state (49%) but less than the nation (46%). The rate decreased by 2 points from 2000 to 2017-21 on par with the nation and higher the state (8 points). Rent is considered affordable if it is less than 32% of income.
- In Rochester, 38% of income went to rent in 2017-21, up 6 points from 2000; while median rent was lower in Rochester than Monroe, median income was much lower. Therefore, rent was relatively less affordable in Rochester.
- Rent was considerably more affordable for white and Asian renters in Monroe than for Hispanic and African American renters.

Of the renter-occupied households in Monroe County, the largest issue identified is the housing cost burden. 46% of the population living below 100% of the Area Median Income experienced a housing cost burden greater than 50% of their total income.

### Median Household Income, by Race/Ethnicity, 2017-21



Data Source ACT Rochester http://www.actrochester.org

In 2017 - 20, the median rent in Monroe County was \$991, lower than the state (\$1,390) and nation (\$1,163), but the highest in the region. Rent increased slightly (1.27%) in Monroe from 2000 to 2017 - 20, in contrast to increases in the state and nation (25% and 16%, respectively).

Monroe County Plans indicate the following:

			Renter		
	0-30%	>30-	>50-	>80-	Total
	AMI	50%	80%	100%	
		AMI	AMI	AMI	
Housing cost					
burden greater					
than 30% of					
income (and					
none of the					
above					10,78
problems)	1,044	4,370	4,708	665	7
Zero/negative					
Income (and					
none of the					
above					
problems)	971	0	0	0	971

Data 2011-2015 CHAS

Of the renter-occupied households in Monroe County, the largest issue identified is the housing cost burden. 46% of the population living below 100% of the Area Median Income experienced a housing cost burden greater than 50% of their total income. This issue of housing cost burden becomes more prevalent among owner-occupied households, with 55% of the population spending over 30% of their total income on housing costs.

### Cost Burden > 30% Data Analysis

Of those households whose housing cost burden exceeds 30% of their total income, there are similar trends between homeowners and renters. 30% of renters experiencing a cost burden exceeding 30% of their total income live in small, related quarters, while 28% of owner-occupied households experience the same issue. What is striking is the percentage of the total number of households whose cost burden exceeds 30% of their total income being elderly. 34% of all renters whose cost burden exceeds 30% are elderly, and 48% of all homeowners whose cost burden exceeds 30% experience this issue.

### Cost Burden > 50% Data Analysis

The disproportionate need for affordable senior living facilities identified in "Cost Burden > 30%" continues to be an issue for households whose cost burden exceeds 50% of their total income. 18% of renters and 23% of owner-occupied homes in Monroe County whose homes are home to elderly populations have a housing cost burden exceeding 50% of their total income.

Monroe County has identified a need for seniors to have access to affordable housing.

#### Homeless

The latest available point-in-time survey in Monroe County (Dated 01/23/2019) indicated that 849 total persons were experiencing some form of sheltered or unsheltered homelessness. Of that population group, 159 individuals were in emergency shelters who were below the age of 18. There were 549 Male individuals and 298 Female individuals experiencing some form of sheltered or unsheltered homelessness, and a disproportionately large percentage of the African American population in Monroe County was suffering from some form of homelessness. It should be noted that this PIT survey does include the City of Rochester.

The City of Rochester's 2018 Housing Market Study, which has been incorporated into the Rochester 2034 Comprehensive Plan, indicates the very low incomes, not high housing costs, are at the root of affordability challenges in the City. Citywide costs have remained steady in recent years after being adjusted for inflation. Affordability is a significant issue; nearly 60% of renter households are cost-burdened, paying more than 30% of their gross income to housing expenses. The main driver of this problem is that incomes for many households in the city are very low. More than 25% of city households have incomes below \$15,000/year, and more than 40% have incomes below \$25,000/year. Additionally, gross household income has been declining in recent years, falling nearly 4% since 2010 (adjusted for inflation). Reinforces the county's claims by providing a thorough analysis of the low-income population and the availability of affordable rental units.

The Plan also states: The number of "nuclear families" (defined as two adults, married households with children) has decreased over time. Today, less than half of city households are "families" (defined as two or more people related by birth, marriage, or adoption residing together) and, of those, nearly 60% are headed by a single adult. Median household size has also decreased over time. Today nearly 70% of city households have two or fewer people, and 41% of city households are individuals living alone. As jobs have left the city and as more and more city households are single people or single adult families, median household income has also sharply declined, falling nearly 20% in constant dollars since 2000. About 17% of city residents live with a disability (defined as a person who has difficulty with hearing, vision, cognition, physical movement, self-care, or independent living). The city's population is also aging and becoming more racially, ethnically, and linguistically diverse.

These shifts impact people's housing needs and preferences, as well as the scope of (and limitations to) their housing choices. For example, single individuals may not want as much space or the level of maintenance that a single-family home conveys but may have trouble finding other housing options in city neighborhoods that are dominated by single-family homes. Similarly, a disabled person or an aging household may have a strong desire or need for accessible housing and single floor living, but Rochester's historic housing stock does not currently offer enough of these options. In addition, generational and societal shifts in housing preferences have taken place. Some of these shifts – such as the increasing interest in downtown and walkable urban neighborhood living – give the city a competitive advantage relative to housing choices in other municipalities in the region. Other shifts, like the growing interest in new housing types such as condos, senior communities, co-housing, housing cooperatives, tiny homes, etc., may mean that the city's current housing stock is outdated relative to emerging preferences.

One of the biggest challenges facing our community – given the age of our housing stock, the increasing diversity of our community, and the relatively low wages and high levels of poverty in the city – is how to provide a range of housing choices that meet people's needs and preferences at price points that city residents can afford.

## Rochester Housing Authority – Public Housing Jurisdictional Needs Assessment Table

Table 1	Housing Needs Assessment of Families on the Public Housing Waiting List						
	EXTREMELY LOW INCOME	ELDERLY/DISABLED	RACIAL/ETHNIC GROUP				
Affordability Issues	Continued steady demand is expected based on the number of people experiencing a high rental cost burden and families on the public housing waiting list.	There is an adequate supply of affordable, quality housing available in public housing developments.	As of 2/3/25, Blacks constitute 47% of the total waiting list, Hispanics 24%, American Indian/Native Alaskan 1% <1%, Asian <1%, Hawaiian/Other Pacific Islander 3%, Whites constitute 2 4% of the total waiting list. 24% of the waiting list identify as being multiracial or declined to report.				
Supply of Housing	Could be slightly increased over the next 2-5 years. The greatest need being in the larger bedroom sizes of four and five.	Sufficient for the next 2-5 year. Though there is a need for 504 accessible two bedroom and larger units.	Could be slightly increased over the next 2-5 year				
Quality of Housing	Existing units are of good quality.	Existing units are of good quality	Existing units are of good quality				
Accessibility	Good supply.	Good supply.	Good supply.				
Size	Sizes of units are not a supply problem	Sizes of units are not a supply problem	Size of units are not a problem				
Location of Housing	All public housing development are located in the city	All public housing development are located in the city	All public housing development are located in the city				

## Rochester Housing Authority – Housing Choice Voucher Waiting List Needs Assessment Table

Table 1	Housing Needs Assessr	nent of Families on the Housing C	hoice Voucher Waiting List
	EXTREMELY LOW INCOME	ELDERLY/DISABLED	RACIAL/ETHNIC GROUP
Affordability Issues	RHA opened the waiting list and accepted new applications on Monday, December 9, 2019, at 12:01 am until Sunday, December 22, 2019, at 11:59 pm. Income data on the waiting list is not available.	Not as critical for the elderly as there is a substantial amount of elderly assisted housing. For the disabled, there are not as many choices. 17% of the new Section 8 applicants indicated they were disabled	Blacks constitute 51.1% of the total waiting list, Hispanics 19.7%, American Indian/Native Alaskan 0.84%, Asian .53%, Hawaiian/Other Pacific Islander 3.2%. Whites constitute 22.7% of the total waiting list. 22.2% of the waiting list identify as being multiracial or declined to
Supply of Housing Great	A majority of voucher holders are able to find housing. Some are turned back in because they couldn't find units. Supply of decent, safe, quality housing seems to be in limited.	A majority of voucher holders are able to find housing. Some are turned back in because they couldn't find units. Supply of decent, safe and sanitary housing seems to be in limited supply.	None Determined.
Quality of Housing	Existing units are of good quality.	Existing units are of good quality	None Determined.
Accessibility	Moderate supply.	Short supply.	None Determined
Size – 4 BR & Up	Short supply in this affordability range.	Not applicable.	None Determined.
Location of Housing.	The majority of Section 8 certificate/voucher holders reside in the City of Rochester. Approximately 2000 families on the Section 8 program are located outside of city limits	The majority of Section 8 voucher holders reside in the City of Rochester. Approximately 1143 elderly/disabled families on the Section 8 programs are located outside of city limits	None Determined.

### ROCHESTER HOUSING AUTHORITY STRATEGIES FOR ADDRESSING HOUSING NEEDS

The Rochester Housing Authority shall continue to address the housing needs in the Rochester community based on updated needs assessment and as determined upon creation of an updated strategic plan, which will be undertaken by RHA.

Need: Shortage of affordable housing for all eligible populations

# Strategy 1: Maximize the number of affordable units available to RHA within its current resources by:

- Employing effective maintenance and management policies to minimize the number of public housing units off-line.
- Reduce turnover time for vacated public housing units.
- Reduce time to renovate public housing units.
- Seek replacement of public housing units lost to the inventory due to the demolition of substandard housing. RHA is planning the redevelopment of several of its public housing sites; currently, the Federal Street Townhouses and several scattered sites are in the process of redevelopment. These redevelopment projects may increase or decrease the number of available public housing units. If the number is decreased, RHA intends to replace those units at locations to be determined. RHA has room in its Faircloth limit to do so.
- Seek replacement of public housing units lost to the inventory through Section 8 replacement housing resources.
- RHA intends on continuing to participate in the HUD Rental Assistance Demonstration (RAD) program and has several sites, Parliament Arms, Fairfield Village, and Glenwood Gardens apartments in the RAD project pipeline and pipeline and are in various stages of planning, design and construction. Resident meetings have been held and will continue to ensure residents are informed.
- Establish Payment Standards for the Voucher programs that maintain a balance between the availability of units, lease-up rates, and assisting as many families as financially possible.
- Undertake measures to ensure access to affordable quality housing among families assisted by RHA, regardless of the unit size required.
- Maintain or increase Voucher lease-up rates and available housing stock by marketing the program to owners, particularly for units outside of areas of minority and poverty concentration.
- Maintain or increase Voucher lease-up rates by advising participants on the importance of being an excellent tenant to increase owner acceptance of the program.
- Committing new Project-Based Vouchers (PBV) for new or rehabilitated housing
  developments. RHA will consider committing new PBVs until RHA reaches the 20% cap
  allowed by HUD or the program fails to continue to further the goals of RHA. Projects
  applying for PBVs can be located anywhere in the RHA voucher jurisdiction. RHA plans to
  utilize PBV's for targeted populations.
- Applying for new PBV funding opportunities announced by HUD or other resources when they become available. Such opportunities could include the HUD Rental Assistance Demonstration program, HUD-VASH, or other similar opportunities.
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies.

### Strategy 2: Increase the number of affordable housing units by:

- Applying for additional vouchers should they become available through HUD or New York State.
- Leverage affordable housing resources in the community through the creation of mixed-finance housing, offering additional project-based voucher contracts for new construction/major renovations, and consider converting existing public housing stock and the surrounding neighborhoods into other forms of affordable/mixed-income communities.
- Pursue housing resources other than public housing or housing choice voucher assistance, such as supportive housing programs.
- Increase density by adding additional units where feasible in development projects and RAD conversions.
- Utilize Faircloth to RAD when applicable.

Strategy 3: Investigate RHA's ability to participate in owning, managing, or increasing affordable housing units throughout Monroe County, particularly for very low-income households, e.g., providing project-based Section 8 vouchers to enhance project feasibility.

• As of March 2024, RHA is administering 2,684 Project-Based Vouchers throughout the five-county jurisdiction. Of the 2,684, there are 780 units located outside the City of Rochester. There are 63 project-based units under AHAP for new/renovated developments in the construction process. There are an additional 54 units pending AHAP. The active number of project-based vouchers has increased by two-hundred twenty-eight since March 2023.

# Strategy 4: Review the use of the HUD Income Disregard program for providing work incentives, e.g., public housing, Section 236, voucher, and welfare program definitions of "income."

- Comment: The public housing rent payment system established in the Quality Housing and Work Responsibilities Act of 1998, Section 253 Family Choice of Rental Payment. Superimposed on top of a minimum rent, each public housing family shall annually choose between four types of rent payment, a flat rent or income-based rent (10% of gross or 30% of adjusted gross income), welfare rent.
- Each PHA shall establish a flat rental amount for each of its units based on the rental value of the unit, as determined by the PHA. The flat rent shall be designed so it does not create a disincentive for continued residency in public housing by families who are attempting to become economically self-sufficient through employment or who have attained a level of self-sufficiency through their own efforts. The rental amount for a dwelling unit shall be considered to comply with the requirements of this clause if it does not exceed the actual monthly costs to the public housing agency attributable to providing and operating the dwelling unit. However, PHAs can develop their flat rents in any manner that complies with this requirement.
- If a family chooses to pay the flat rent, they shall be provided the opportunity to immediately switch to the income-based rent because of financial hardships such as:

- 1. Situations in which the income of the family has decreased because of changed circumstances, loss or reduction of employment, death in the family, and reduction in or loss of income or other assistance.
- 2. An increase, because of changed circumstances in the family's expenses for medical costs, childcare, transportation, education, or similar items; and
- 3. Such other situations may be determined by the agency. If a family chooses the flat rent option, PHAs shall review their income not less than every three years. For cases where public housing residents and Section 8 recently become employed, annual disregards are available.

Need: Specific Family Types: Families at or below 30% of median

### Strategy 1: Target available assistance to families at or below 30 % of AMI

- Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing.
- Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based Section 8 assistance.
- Adopt rent policies to support and encourage the employment of residents/participants.

Need: Specific Family Types: Families at or below 50% of median

### Strategy 1: Target available assistance to families at or below 50% of AMI

- Employ admissions preferences aimed at families who are working.
- Adopt rent policies to support and encourage working families.

**Need: Specific Family Types: The Elderly** 

### Strategy 1: Target available assistance to the elderly:

- Seek designation of public housing for the elderly
- Apply for special-purpose vouchers targeted to the elderly, should they become available.

**Need: Specific Family Types: Families with Disabilities** 

### **Strategy 1: Target available assistance to Families with Disabilities:**

- Continue to carry out the modifications needed in public housing based on the Section 504
   Needs Assessment for Public Housing
- Apply for special-purpose vouchers targeted to families with disabilities, should they become available.
- Affirmatively market to local non-profit agencies that assist families with disabilities.

Need: Specific Family Types: Races or ethnicities with disproportionate housing needs

# Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:

• Affirmatively market to races/ethnicities shown to have disproportionate housing needs.

### Strategy 2: Conduct activities to affirmatively further fair housing

- Counsel voucher participants as to the location of units outside of areas of poverty or minority concentration and assist them in locating those units.
- Market the voucher program to owners outside of areas of poverty/minority concentrations

# **Need: Programs to Promote Self-Sufficiency for Public Housing Residents and Housing Choice Voucher Tenants**

Strategy 1: Develop innovative approaches to financing and implementing affordable for-sale housing, which has the ability to expand opportunities for targeting market segments (household below the 50% MFI), e.g., Rent-to-own, land contracts, community land trust, Section 8 Homeownership option demonstration, etc.

The homeownership option has been offered to Voucher and Public Housing families. RHA families that express interest in homeownership are referred to various homeownership programs in the community.

RHA is assisting program participants in achieving their homeownership goals by providing FSS participants with homeownership training, free financial counseling, building an escrow savings account, and linking them with grants or other local homeownership programs. RHA is in the process of assessing its homeownership plan to determine the best option for growing the homeownership program.

All these programs represent HUD's efforts to assist families in finding and maintaining quality affordable housing by offering supportive services that will aid families to stabilize income and increase earning power. Families are empowered by becoming self-sufficient with less dependence on government assistance for shelter and other basic needs.

# Strategy 2: Create more effective use of RHA Section 3 strategies to provide jobs for the protected class residing in public housing.

The RHA Resident Services Department has fostered and promoted this goal. The Authority, through the efforts of the Resident Services Department, has been placing a higher than ever focus on promoting Section 3 opportunities. Resident Services has received HUD ROSS (Resident Opportunities and Supportive Services) funding and is working to develop collaborations with local organizations and training programs designed to promote skilled trades and employment opportunities. Families may enhance earning power by participating in employment and training programs on-site at Resident Services or at various sites, which are designed to increase their capacity to find new and better employment opportunities.

RHA intends to ensure that training and employment opportunities created through the expenditure of Section 3 Covered Assistance will be provided to Section 3 Qualified Individuals and Business Concerns. Additionally, RHA is stepping up its promotion to add Section 3 contractors to its list of eligible contractors for bidding. We are also developing more training

alternatives for residents to develop skills in construction-related trades with the goal of adding them to our contractor list. RHA 3 businesses received over \$2.8 million in contract awards in FY2021.

For families who express an interest in business start-ups, Rochester Housing Authority works closely with the Urban League of Rochester and will refer those individuals to attend business start-up education and certification.

As indicated in the City's Comprehensive Plan: Housing affordability challenges in Rochester are rooted in very low incomes, not high, and rising housing costs. This distinction is critical to understand because low incomes are a different problem to solve than high housing costs, and they are a problem that housing policy cannot directly solve on its own. Strategies around economic development, workforce development, education, financial literacy, and others must be seen as critical components for addressing affordable housing challenges that are specific to our market.

RHA revised its Section 3 plan in accordance with HUD's Final Rule in July 2021.

# Strategy 3: Better align and coordinate City, County, and Rochester Housing Authority Section 3 strategies with JTPA funding to provide greater employment opportunities for members of the protected classes.

Comment: The New York State Department of Labor Joint Training Partnership Act (JTPA) is replaced by the DOL Workforce Investment Act of 1999. The Rochester Housing Authority is represented as a partnering agency on the Rochester Workforce Investment Board, which represents community agencies, public and private, educational institutions, and employers all working collaboratively to address the employment and training needs of community residents.

### **Construction Trades Training**

RHA has ramped up its Section 3 efforts and is currently working with local agencies that will provide public housing residents with skilled trades that will increase their employment opportunities that will lead to economic stability and self–sufficiency.

### **Soft Skills Job Readiness Training**

Currently, RHA refers public housing and Section 8 residents and tenants to Rochester Works for soft skills training, resume assistance, and job search assistance.

RHA makes referrals to the appropriate agencies that provide GED, literacy, and job skill training services. These organizations include the Literacy Volunteers of Rochester and Rochester Educational Opportunity Center (REOC). RHA resident councils at several sites have and are conducting computer training sessions for all residents who wish to participate. The resident councils are also exploring options and potential partnerships for Spanish/English classes on-site.

### **Reasons for Selecting Identified Housing Needs Strategies**

The factors listed below influenced RHA's selection of the strategies it will pursue:

• Funding constraints.

- Staffing constraints.
- Limited availability of sites for assisted housing.
- The extent to which other organizations in the community meet housing needs.
- Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to RHA.
- Influence of the housing market on RHA programs.
- Community priorities regarding housing assistance.
- Results of consultation with local or state government.
- Results of consultation with residents and the Resident Advisory Board.
- Results of consultation with advocacy groups.
- Change in funding stream for resident programs.
- Increased need for self-sufficiency.

**Need:** Achieve and sustain the HUD-required 96% occupancy rate for the Public Housing Program to ensure maximum utilization of available housing resources.

**Strategy 1:** Enhance and streamline communication with applicants regarding their status on the Public Housing waitlist, ensuring they receive timely updates and information to improve engagement and reduce waitlist attrition.

- Notify applicants on an annual basis of their estimated wait time and position on the waitlist, ensuring they are informed and engaged in the process.
- **Send annual reminders to applicants** regarding the policy and procedure for making changes to their application, including how, when, and where changes can be submitted.
- Notify applicants of any policy changes that may affect their eligibility for admission, particularly changes under the Housing Opportunity Through Modernization Act (HOTMA), so they remain up-to-date with current regulations.
- **Publish current wait times** for each waitlist on RHA's website and Facebook page, providing transparency and helping applicants better manage their expectations regarding waitlist status and timeframes

**Strategy 2:** Reduce the expected wait time for Public Housing applicants from 24 months to 12 months, ensuring a more efficient placement process and maintaining a current and active waitlist.

• Revise the "Closing the Waiting List" policy in the Admissions and Continued Occupancy Policy (ACOP) to state that the waitlist will close once the estimated wait time for the most recent applicants reaches 12 months.

**Strategy 3**: Maintain a minimum of 20 approved applicants per bedroom size to ensure a readily available pool of eligible residents, allowing for faster placement and reduced vacancy periods.

**Strategy 4:** Maintenance Department will develop contracts to speed up the process to provide rehabbed units quicker for Public Housing to lease up to residents.

### ATTACHMENT 20

### **Explanation of Significant Change from Previous Year**

### Criteria of Substantial Deviation and Significant Amendments

U.S. Department of Housing and Urban Development (HUD) statute, Public and Indian Housing (PIH) Notice 9951 requires that public housing authorities explain "substantial deviations" from the 5-Year Plan in their Annual Plans.

The statute also provides that, while public housing authorities may change or modify their plans or policies described in them, any "significant amendment or modification" to the plan would require public housing authorities to submit a revised PHA Plan that has met full public process requirements. The Rochester Housing Authority defines the following circumstances that will constitute a significant amendment/modification to this agency's PHA plan:

- Changes made to the management policies and organization of the waiting list which negatively affects applicants.
- Addition of non-emergency work items (items not included in the current Annual Statement or 5-Year Action Plan) or changes in the use of replacement reserve funds under the Capital Fund in the amount of 20% or more of the annual grant.
- Any changes concerning to demolition or disposition, designation, homeownership programs, or conversion.
- Activities not identified in the plan.

A substantial deviation may be defined as a loss and/or inadequate funding for a program, reallocation of funding to sustain programs, and/or a change in regulatory requirements governing a program, thus requiring the PHA to amend its agency plans.

### **<u>Leasing Operations</u>** - Housing Choice Voucher Significant changes

Leasing Operations Department Administrative Plan was approved by the Board of Commissioners on 09/20/2021 and approved additional changes on 08/24/2022. The changes were not a substantial deviation and did not require a 45-day comment period. The updated Administrative Plan changes included:

- Rental Assistance Demonstration (RAD) Vacancy Payments vacancy payments to the owner for vacant units will be determined on a case-by-case basis.
- RAD Insufficient Funding to have RAD developments last when terminating contracts and receive HUD approval.
- The PHA and owner may amend the HAP contract to add additional PBV contract units in projects that already have a HAP contract without having to fulfill the selection requirements found at 24 CFR 983.51(b) for those additional PBV units, regardless of when the HAP contract was signed.

To date, we have canvased all of our applicants on the Housing Choice Voucher Waiting List for prequalification.

Due to COVID-19 Pandemic, we implemented processes to ensure the health and safety of HCV Participants and our staff in Leasing Operations Department, and the following are still in place:

- Drop boxes were made available for participants and customers to deliver their documents.
- Staff cubicles, lobby bay areas, and interview spaces were redesigned to have recommended social distance.
- PPE remain available on site for staff.
- We continue to conduct all inspections, include biennial inspections.
- All workspace stations where staff will interact with customers have an acrylic barrier.

### **Public Housing:**

RHA is making efforts to improve the efficiency of housing participants from the point of application to move in. Strategies being explored/implemented are reducing the timeframe of the rental history that an eligibility/suitability decision is based on.

RHA has revised the Assistive Animal/Pet Policy to include more specific guidelines for Assistive Animals, a revised Grievance Policy, and a new No Trespass Policy which have been Board approved.

RHA continuously reviews and amends its Admission and Continued Occupancy Policy and the Housekeeping Policy.

Effective 2/5/24, RHA's Public Housing Program has implemented an Occupancy/Lease Up Plan that outlines strategies and new initiatives to increase and maintain the occupancy rate at or above the HUD 96% occupancy threshold.

### **Resident Services**:

To ensure the health, safety, and accessibility of services for residents, participants, and staff, Resident Services implemented the following:

- Intake and orientation appointments are conducted virtually and in person. Recertifications and Family Self-Sufficiency updates are conducted by mail.
- Drop boxes were made available for participants and customers to deliver their documents and limit person-to-person contact.
- PPE is kept available on site for staff.
- Resources to assist residents and participants are communicated through Facebook and our website and occasionally by robocall.

Additional non-emergency CFP work items

Any change with regards to demolition or disposition

# of Public Housing Units

### &

### **B2** New Activities

### **Demolition and/or Disposition**

RHA routinely examines its public housing units to evaluate whether they continue to meet resident needs and provide quality, safe, affordable housing.

The RHA has submitted a demo application to the Special Applications Center (SAC) to demolish a portion of the Bond St. Townhouses and will be submitting a demo application for a scattered site unit at 216-220 Edinburgh St. Future demo applications are being considered for other sites based upon updated property needs assessment (PNA's), which are undertaken on a rolling basis.

RHA may utilize the RAD program or other HUD programs to redevelop the highlighted properties. The following is a list of these Scattered Sites properties which may be converted under the RAD

program, demolished, and/or disposed of:

Address	# Of Units	# Of Bedrooms	Sq. Ft./unit	AMP
14-20 Henry St.	6		644	562
35-37 Floverton Street	2	2 - three bedroom	1152	361
593-595 Lexington Avenue	2	2 - two bedroom	864	361
33-39 Lincoln	2	2 - three bedroom	1152	562
7-9 McFarlin Street	2	2 - three bedroom	1152	562
1111-1113 Norton Street	2	2-three bedroom	1152	562
62-66 Ok Terrace	2	2-four bedroom	1392	562
24-26 Weld Street	2	2-three bedroom	1152	562
624-626 West Broad Street	2	2-two bedroom	864	361

The lot at 36-40 Shirley Street has been subdivided into two lots and will allow for the construction of one house on each property. Plans and specifications have been developed to construct two single-family dwellings with detached garages. RHA is looking into alternative development options to build these units. RHA is also looking to add this property along with 43 Eiffel Pl to a larger single-family home or multi-unit development to be more economical. When developed, they may become part of RHA's public housing portfolio and/or be part of RHA's homeownership program.

RHA has retained the services of a Consultant through the New York State Preservation and Opportunity (NYSPOP) program, to review key properties in its portfolio to make recommendations on the most advantageous method of preserving or redeveloping its properties to continue RHA's mission. Physical needs assessments and environmental testing have been performed at most of its public housing sites which will be used in developing strategies and prioritization of projects. One of the potential outcomes may be the demolition of some properties. Potential sites to be evaluated may include:



Address	# Of units	# Of bedrooms/unit	Sq. Ft./unit	AMP	Accessible Features
Atlantic Townhouses	24	12 one bedroom	One bedroom- 580	334	none
117 Atlantic Ave	44	12 three bedrooms	Three bedroom- 1220	554	none
	44	16 two bedrooms	Two bedroom- 1100	554	none
Bay/Zimmer Townhouses 52 Bay Street	39	16 three bedrooms	Three bedroom- 1100	334	none
	16	10 four bedrooms	Four bedroom- 1300	361	none
	3	2 five bedrooms	Five bedroom- 1300	361	none
Bond/Hamilton 255 Hamilton Street	10	9 three bedrooms	Three bedroom- 1180	361	One unit has an exterior elevator
Kennedy Tower 666 S. Plymouth Ave.	80	1 two bedrooms	One bedroom - 760	222	lift and an interior stairway lift.
Bronson Court	39	20 two bedrooms	Two bedroom- 90	334	none
99 Dr. Samuel McCree Way	72	19 three bedrooms	Three bedroom- 1100	554	none
Capsule Dwellings	16	16 three bedrooms	Three bedroom- 1100	361	none
143-145 Troup Street	208	208 One bedroom	One bedroom - 660	113	several 504 units
216-220 Edinburgh Street	3	3 Three bedroom	Three bedrooms 1120	361	none
Glenwood Gardens 295 Santee Street	124	124 One bedroom	One bedroom - 500	112	several
	78	52 Three bedroom 26 Four bedroom	Three bedroom - 1000	442	504 units

Kennedy Tower	80	80 One bedroom	One bedroom - 760	222	several
GGG C Divers outh Ave	2	2 Four bedroom	Four bedroom - 1392	561	504 units
666 S. Plymouth Ave.	2	2 Four bedroom	Four bedroom - 1392	561	504 units

RHA has submitted a demo application to the SAC office for Bond/Hamilton, and intends on submitting demo applications for Edinburgh St, and other Scattered sites listed in the chart earlier in Attachment 20.

RHA is in the process of redeveloping the Bond/Hamilton site. The design includes the demolition of two units connected to the existing 6-unit row structure on Bond Street and replaced with an accessible 2-family structure, each unit with a first-floor accessible bedroom, bathroom, and two second-floor bedrooms and full bathroom. As part of RHA's mission to "Change the Face of Public Housing", the remaining 4 units and the new 2-family structure will include significant changes to the building's elevations including gabled rooflines, porches, and period style windows to mimic existing properties in the neighborhood. Demolition of an existing 2-family structure located within the interior of the property will allow for increased on-site parking, including two handicapped spaces as well as a new dumpster enclosure. The design documents are complete and an application to demolish units 13, 15, 17, and 19 has been sent to HUD's Special Applications Center (SAC) where it has been approved. Substantial completion of this project is planned for early 2025.

RHA has retained the services of an Architectural firm to develop a conceptual plan for a major upgrade to our property located at 1-3 Thomas Street as part of our "Change the Face of Public Housing" initiative. The family-friendly plan renderings were shared with RHA stakeholders and officials from the City of Rochester where it received very positive reviews. The property is located in an area of the city that has experienced a long history of disinvestment but now has become the focus of RHA's and the City of Rochester's efforts to make it an area where people desire to move to instead of moving away from. Construction is estimated to start in early 2025, with completion by late 2025.

RHA has started the process of redeveloping the site at 216-220 Edinburgh Street. The overall goal of the project is to continue RHA's mission to "Change the Face of Public Housing" and to provide units that are handicap accessible and more updated for today's family's way of living. The current three- family townhouse is in poor condition and not very functional. Even though it is accessible, it does not have a first-floor bedroom, and it would be difficult for a disabled person to get around on the first floor. The rooms are very small and separated with walls. The exterior does not fit into the historic neighborhood especially with front yard parking. The intent is to demolish the building and rebuild a duplex that is more fitting with the architecture of the neighborhood, be accessible with a first-floor bedroom and updated floor plans. The units are vacant with no plan to inhabit them due to their condition. It would cost more to rehabilitate this building than to rebuild a better and more functional duplex. RHA has contracted with an architect to redesign the site with a duplex on it, driveways with parking to rear of the site and a more fitting style of architecture for the neighborhood. This is in the design phase.

The Bronson Court Complex is undergoing a 3 Phase Site Upgrade. Phase I involved replacement all of the old roofs on the building due to deficiencies. Phase II included reside all of the buildings, add new porches and

decks, provide upgraded CATV service and some new sidewalks. This project is estimated to be completed by early 2025. This project is part of the 'Changing the Face of Public Housing Initiative'. Better quality products will be used, and different colors of siding will be incorporated for a nicer curb appeal look. Phase Ill will complete the project with landscaping, balance of sidewalks, courtyard with gazebos, picnic tables and grills, new light poles around the complex and light fixtures on the buildings.

Unit upgrades will continue at Bronson Ct and Harriett Tubman Estates. Previously there were fires in 4 of the units-2 from each site. Those units were rehabilitated and updated as part of 'Changing the Face of Public Housing Initiative'. More up to date products were used throughout. The first-floor plans were redesigned to create an open floor plan to accommodate today's family lifestyles. To continue this initiative, the rest of the units in the complexes will be done in the same manner.

The single-family unit at 158 Bartlett St is designated as an accessible unit in RHA's inventory. Currently it is not fully accessible in design or meets today's codes. This is in process of design to make it more compatible for accessible use based on ADA/ANSI requirements. The site is being revisited for handicapped parking and access. Providing that this will cost prohibitive, the unit will be renovated for full accessibility. If it is going to be too costly, then the unit will be renovated without making major changes.

Currently RHA has 9 sites that will be receiving porch reconstructions in 2023. RHA will continue to assess our housing inventory and PNA's for the scattered sites in the portfolio. Those that have porches that need major replacement will be added to a list of others for reconstruction each year. Capital Projects will be creating another list for the 2025 porch packages, as well as other site improvements such as driveways, sidewalks, accessible entrances and accessibility upgrades where practicable.

RHA purchased a property at 1321 Lexington Ave. This is adjacent to an RHA property, Lexington Court. The property at 1321 Lexington has on older house and garage it that is not worth rehabilitating due to age, condition and number of repairs needed to bring it up to current standards. The house was built in 1883 and the garage in 1935 on 1.47 acres that run parallel to the Lexington Court Complex. RHA has demolished both buildings under abatement in order to redevelop the site. The units developed may be Public Housing units, affordable housing or units designated for homeownership and will include such amenities as storage, maintenance support facilities and resident-supportive services

RHA currently owns 104 Dr. Samuel McCree Way which is a small piece of vacant land, .08 acres, next to RHA's Bronson Court Townhouses at 90 Dr. Samuel McCree Way. Capital Projects will be exploring the possibility of developing that piece of property into additional parking for the complex. Currently the parking lot for the complex is very limited in parking and could utilize more spaces for the residents. This process will have to incorporate the combining of the individual lots at the site into one deed and contract with an architect to assist with design and any variance applications required to make this happen. Parking studies are also anticipated on many of our public housing sites to address shortages, traffic and safety concerns.

RHA intends to perform an overall safety and access control evaluation on our public housing sites to determine improvements to security and safety through the utilization of technological and site-based solutions. This will be an ongoing effort in conjunction with evaluation for accessibility improvements for residents.

### ATTACHMENT 20-2

RESIDENT RIGHTS, PARTICIPATION, WAITING LIST AND GRIEVANCE PROCEDURES APPLICABLE TO PROPERTIES CONVERTING TO PROJECT-BASED VOUCHERS EXCERPTS OF PIH NOTICE 2012-32: SECTIONS 1.6.C AND 1.6.D

PIH-2012-32 (HA)/H-2017-03, REV-3 Rental Assistance Demonstration — Final Implementation As amended by PIH-2018-11/H-2018-05 Rental Assistance Demonstration (RAD) — Supplemental Guidance

### C. PBV Resident Rights and Participation.

1. No Rescreening of Tenants upon Conversion. Pursuant to the RAD Statute, at conversion, current households cannot be excluded from occupancy at the Covered Project based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. 32 Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified in this Notice (e.g., rent phase-in provisions). For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting of tenants for initial occupancy, will not apply for current households. Once the grandfathered household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement. Further, so as to facilitate the right to return to the assisted property, this provision shall apply to current public housing residents of the Converting Project that will reside in non-RAD PBV units or non-RAD PBRA units placed in a project that contain RAD PBV units or RAD PBRA units. Such families and such contract units

<sup>&</sup>lt;sup>32</sup> These protections (as well as all protections in this Notice for current households) also apply when a household is relocated to facilitate new construction or repairs following conversion and subsequently returns to the Covered Project.

will otherwise be subject to all requirements of the applicable program, specifically 24 CFR § 983 for non-RAD PBV units and the PBRA requirements governing the applicable contract for non-RAD PBRA units.<sup>33</sup>

- Right to Return. See section 1.4.A.5(ii) and the RAD Fair Housing, Civil Rights, and Relocation Notice regarding a resident's right to return.
- Renewal of Lease. Since publication of the PIH Notice 2012-32 Rev 1, the
  regulations under 24 CFR part 983 have been amended requiring Project Owners to
  renew all leases upon lease expiration, unless cause exists. MTW agencies may not
  alter this requirement.
- 4. Phase-in of Tenant Rent Increases. If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase-in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section "Calculated PBV TTP" refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1, as illustrated below.

#### Three Year Phase-in:

 Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP

<sup>&</sup>lt;sup>33</sup> For non-RAD PBV households, applicable program requirements includes the requirement that any admission to the project must be initially eligible for a HAP payment at admission to the program, which means their TTP may not exceed the gross rent for the unit at that time.

- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and all subsequent recertifications Full Calculated PBV TTP 34

#### Five Year Phase in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP
- Year 2: Year 2 AR and any IR prior to Year 3 AR 25% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR 33% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 5 AR and all subsequent recertifications Full Calculated PBV TTP

Please Note: In either the three year phase-in or the five-year phase-in, once the Calculated PBV TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward. MTW agencies must also implement a three or five-year phase-in for impacted residents, but may alter the terms above as long as it establishes a written policy setting forth the alternative terms.

5. Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs. Public Housing residents that are currently FSS participants will continue to be eligible for FSS once their housing is converted under RAD. The PHA may continue to use any FSS funds already awarded to serve those FSS participants who live in units converted by RAD. At the completion of the FSS grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. If the PHA continues to run an FSS program that serves PH and/or HCV participants, the PHA will continue to be eligible (subject to

<sup>&</sup>lt;sup>34</sup> For example, where a resident's most recently paid TTP is \$100, but the Calculated PBV TTP is \$200 and remains \$200 for the period of the resident's occupancy, (i.e. no changes in income) the resident would continue to pay the same rent and utilities for which it was responsible prior to conversion. At the first recertification following conversion, the resident's contribution would increase by 33% of \$100 to \$133. At the second AR, the resident's contribution would increase by 50% of the \$66 differential to the standard TPP, increasing to \$166. At the third AR, the resident's contribution would increase to \$200 and the resident would continue to pay the Calculated PBV TTP for the duration of their tenancy.

NOFA requirements) to apply for FSS funding and may use that funding to serve PH, HCV and/or PBRA participants in its FSS program. Due to the program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the subsequent Appropriation Acts), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD.

However, PHAs should note that there are certain FSS requirements (e.g., escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR part 984, the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 FR 78100.35 Further, upon conversion to PBV, already escrowed funds for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.

For information on FSS PIC reporting requirements for RAD conversions, see Notice PIH 2016-08 at <a href="http://portal.hud.gov/hudportal/documents/huddoc?id=pih2016-08.pdf">http://portal.hud.gov/hudportal/documents/huddoc?id=pih2016-08.pdf</a>.

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future ROSS-SC grants, nor will its residents be eligible to be served by future ROSS-SC grants, which, by statute, can only serve public housing residents. At the completion of the ROSS-SC grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. Please note that ROSS-SC grantees may be a non-profit or local Resident Association and this consequence of a RAD conversion may impact those entities.

<sup>35</sup> The funding streams for the PH FSS Program and the HCV FSS Program were first merged pursuant to the FY 2014 appropriations act. As a result, PHAs can serve both PH residents and HCV participants, including PBV participants, with FSS funding awarded under the FY 2014 FSS Notice of Funding Availability (FSS NOFA) and any other NOFA under which the combination of funds remains in the applicable appropriations act. For PHAs that had managed both programs separately and now have a merged program, a conversion to PBV should not impact their FSS participants.

- 6. Resident Participation and Funding. In accordance with Attachment 1B, residents of Covered Projects with assistance converted to PBV will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.
- 7. Resident Procedural Rights. The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.
  - i. Termination Notification. HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall be:
    - a. A reasonable period of time, but not to exceed 30 days:
      - If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
      - In the event of any drug-related or violent criminal activity or any felony conviction;
    - Not less than 14 days in the case of nonpayment of rent; and
    - c. Not less than 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.
  - Grievance Process. Pursuant to requirements in the RAD Statute, HUD is establishing additional resident procedural rights to comply with section 6 of the Act.

For issues related to tenancy and termination of assistance, PBV program rules require the Project Owner to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:

a. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi), 36 an opportunity for an informal

<sup>&</sup>lt;sup>36</sup> § 982.555(a)(1)(iv) is not relevant to RAD as the tenant-based certificate program has been repealed.

hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.

- i. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
- For any additional hearings required under RAD, the Project Owner will perform the hearing.
- There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or contract administrator.
- c. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- The Project Owner provides opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

8. Earned Income Disregard (EID). Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in 24 CFR § 5.617(b) limiting EID to disabled persons is waived. The waiver, and resulting alternative requirement, apply only to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants that move into the property following conversion or tenants who at one time received the EID but are not

- receiving the EID exclusion at the time of conversion due to loss of employment) is covered by this waiver.
- 9. Jobs Plus. Jobs Plus grantees awarded FY14 and future funds that convert the Jobs Plus target projects(s) under RAD will be able to finish out their Jobs Plus period of performance at that site unless significant relocation and/or change in building occupancy is planned. If either is planned at the Jobs Plus target project(s), HUD may allow for a modification of the Jobs Plus work plan or may, at the Secretary's discretion, choose to end the Jobs Plus program at that project.
- 10. When Total Tenant Payment Exceeds Gross Rent. Under normal PBV rules, the PHA may select an occupied unit to be included under the PBV HAP Contract only if the unit's occupants are eligible for housing assistance payments (24 CFR) § 983.53(c)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent)) (24 CFR § 983.258). Since the rent limitation under this Section of the Notice may result in a family's TTP equaling or exceeding the gross rent for the unit, for residents living in the Converting Project prior to conversion and who will return to the Covered Project after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. When the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice.37 In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP Contract. The PHA is required to process these individuals through the Form 50058 submodule in PIC.

<sup>&</sup>lt;sup>37</sup> For example, a public housing family residing in a property converting under RAD has a TTP of \$600. The property has an initial Contract Rent of \$500, with a \$50 Utility Allowance. Following conversion, the residents is still responsible for paying \$600 in tenant rent and utilities.

Following conversion, 24 CFR § 983.53(d) applies, and any new families referred to the RAD PBV project must be initially eligible for a HAP payment at admission to the program, which means their TTP may not exceed the gross rent for the unit at that time. Further, a PHA must remove a unit from the contract when no assistance has been paid for 180 days. If units are removed from the HAP contract because a new admission's TTP comes to equal or exceed the gross rent for the unit and if the project is fully assisted, HUD is imposing an alternative requirement that the PHA must reinstate the unit after the family has vacated the property. If the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR §983.207 or, where "floating" units have been permitted, Section 1.6.B.10 of this Notice.

11. Under-Occupied Unit. If a family is in an under-occupied unit under 24 CFR § 983.260 at the time of conversion, the family may remain in this unit until an appropriate-sized unit becomes available in the Covered Project. When an appropriate sized unit becomes available in the Covered Project, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, 24 CFR § 983.260 is waived. MTW agencies may not modify this requirement.

#### D. PBV: Other Miscellaneous Provisions

- Access to Records, Including Requests for Information Related to Evaluation of Demonstration. PHAs and the Project Owner must cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.
- Additional Monitoring Requirement. The Owner must submit to the administering PHA and the PHA's Board must approve the operating budget for the Covered Project annually in accordance with HUD requirements.<sup>38</sup>
- Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3). This section has been moved to 1.4.A.13 and 1.4.A.14.

<sup>&</sup>lt;sup>38</sup> For PBV conversions that are not FHA-insured, a future HUD notice will describe project financial data that may be required to be submitted by a PBV owner for purposes of monitoring and evaluation, given that PBV projects do not submit annual financial statements to HUD/REAC.

- 4. Establishment of Waiting List. 24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program-wide, or site-based waiting list from which residents for the Covered Project will be admitted. These provisions will apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:
  - i. Transferring an existing site-based waiting list to a new site-based waiting list.
  - Transferring an existing site-based waiting list to a PBV program-wide or HCV program-wide waiting list.
  - iii. Transferring an existing community-wide public housing waiting list to a PBV program-wide or HCV program-wide waiting list, an option particularly relevant for PHAs converting their entire portfolio under RAD.
  - iv. Informing applicants on a community-wide public housing waiting list how to transfer their application to one or more newly created site-based waiting lists.

For any applicants on the public housing waiting list that are likely to be ineligible for admission to a Covered Project converting to PBV because the household's TTP is likely to exceed the RAD gross rent, the PHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the PHA's remaining public housing waiting list(s) or to another voucher waiting list, in addition to transferring such household to the waiting list for the Covered Project.

To the extent any wait list relies on the date and time of application, the applicants shall have priority on the wait list(s) to which their application was transferred in accordance with the date and time of their application to the original waiting list.

If the PHA is transferring assistance to another neighborhood and, as a result of the transfer of the waiting list, the applicant would only be eligible for a unit in a location which is materially different from the location to which the applicant applied, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at other sites.

If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the Covered Project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community-

wide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP). 39

A PHA must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations.

To implement this provision, HUD is specifying alternative requirements for 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the Covered Project in accordance with 24 CFR § 983.251(c).

- 5. Mandatory Insurance Coverage. The Covered Project shall maintain at all times= commercially available property and liability insurance to protect the project from= financial loss and, to the extent insurance proceeds permit, promptly restore,= reconstruct, and/or repair any damaged or destroyed project property.
- Agreement Waiver. (This section has been moved to 1.6.B.8, in the updated version of the notice, it is below in its entirety for convenience.). For public housing conversions to PBV there will be no Agreement to Enter into a Housing Assistance Payments (AHAP) contract. Therefore, all regulatory references to the AHAP, including regulations under 24 CFR part 983 subpart D are waived. Instead, the PHA and Project Owner typically will enter into a HAP Contract before construction begins. Until the work is complete, standard HAP Contract funding procedures will be used for occupied units. Units that are not occupied at any point during the period of work identified in the approved Financing Plan and RAD Conversion Commitment may be eligible, subject to the conditions below, for Rehab Assistance Payments equal to the Public Housing Operating Fund and the Capital Fund amounts that formed the basis for the calculation of initial contract rents (see Attachment 1C). During the period of rehabilitation or construction as identified in the RCC and the HAP Contract, the maximum number of units for which a Project Owner can receive RAD Rehab Assistance Payments is limited to the number of units eligible for Operating Fund or Capital Fund subsidy prior to conversion. As a result, some units in the Covered Project may not be eligible for Rehab Assistance Payments.

Following the earlier of the end of the construction period identified in the HUDapproved Financing Plan or actual construction, the PHA will no longer be eligible to receive RAD Rehab Assistance Payments, and all units under contract will be eligible for payment only for occupied units or for vacancy payments, as applicable. MTW agencies may not alter this requirement.

- 7. Future Refinancing. Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with long-term preservation of the Covered Project. With respect to any financing contemplated at the time of conversion (including any permanent financing which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC.
- 8. Administrative Fees for Public Housing Conversions During the Year of Conversion. For the remainder of the Calendar Year in which the HAP Contract ecomes effective (i.e., the "year of conversion"), RAD PBV projects will be funded with public housing funds. For example, if the project's assistance converts effective July 1, 2015, the public housing ACC between the PHA and HUD will be amended to reflect the number of units under HAP Contract, but will be for zero dollars, and the RAD PBV HAP Contract will be funded with public housing money for July through December 2015. Since TBRA is not the source of funds, PHAs should not report leasing and expenses into VMS during this period, and PHAs will not receive section 8 administrative fee funding for converted units during this time. PHAs operating HCV program typically receive administrative fees for units under a HAP Contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Work Responsibility Act of 1998" and 24 CFR § 982.152(b). During the year of conversion mentioned in the preceding paragraph, these provisions are waived. PHAs will not receive Section 8 administrative fees for PBV RAD units during the year of conversion. After the year of conversion, the Section 8 ACC will be amended to include Section 8 funding that corresponds to the units covered by the Section 8 ACC. At that time, the regular Section 8 administrative fee funding provisions will apply.

### **ATTACHMENT 20-3**

#### SPECIFIC INFORMATION RELATED TO THE PUBLIC HOUSING DEVELOPMENTS SELECTED FOR RAD

RHA has retained the services of a consultant and development partner to review properties in its portfolio and make recommendations on the most advantageous method of preserving its properties to continue RHA's mission and align with the neighborhood revitalization planning activities that RHA and the City of Rochester have been working on. One of the potential outcomes may be the conversion of some properties to the RAD program. RHA may also self-identify properties for the program.

RHA has submitted letters of intent to HUD identifying potential public housing properties in its portfolio that may be suitable for a RAD conversion. RHA continues to examine its public housing units and development portfolio to determine if other developments would benefit from a RAD conversion. RHA submitted a letter of interest to HUD for the following properties to be placed on the RAD waiting list:

Jonathan Child Glenwood Gardens
Holland Townhouses Atlantic Townhouses
Capsule Dwellings Bay/Zimmer Townhouses
Bronson Court Waring Rd./Veteran St
Seneca Manor TH's Kennedy Tower
University Tower Lake Tower

**Lexington Court** 

The results of the physical assessment and environmental reports will identify additional public housing properties that RHA could submit an application for RAD conversion to HUD. RHA has retained a Development Partner to assist with property development by obtaining alternative sources of financing and cultivate strategies to improve our properties. These may be done as part of a RAD conversion.

RHA is under construction on the approved RAD conversion for the Federal Street Townhouses, which includes surrounding scattered-site buildings in October 2023. The project includes removal of all buildings on the Federal Street site, construction of two multi-unit buildings with accessible units and a single-family unit on the site. The project also includes 37 scattered sites, 34 of which will undergo various levels of renovations and energy upgrades. Three of the scattered site units will be demolished and a new constructed unit will take its place. RHA will continue to work with each affected resident to ensure their housing needs are met and that they understand they have the right of first refusal to move back to a comparable unit in the development project.

As of Fall 2023, RHA has also undertaken a RAD project encompassing Parliament Arms and Fairfield Village Apartments. The project includes substantial interior and exterior renovations, some demolition and new construction to provide accessible units and community space at each site. Funding applications have been submitted, and final design details are being worked out. Residents have been met with and informed and staff will ensure their housing needs are met if relocated and right of first refusal to return.

RHA has received a CHAP from HUD for the RAD conversion of Glenwood Gardens. This project is in the design phase and will result in demolition of existing buildings, with new construction of multi-story buildings, multi-unit, and single-family units. There will be an increase in the total number of units at this site in effort to provide more affordable housing opportunities for the community. RHA will be partnering with LifeSpan to provide supportive housing at this site.

RHA will continue to work with our residents during the conversion process to ensure that everyone understands the process and what their rights are.

RHA is working with its development partner on an RAD application for Fernwood Development, consisting of two phases with a combination of multi-family buildings, including such amenities as a public library and townhouse units on a remediated brownfield site. This is a vacant site in a mixed-use neighborhood and is being designed to complement the goals of both City and County comprehensive plans.



Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan (All PHAs)

#### U. S Department of Housing and Urban Development

Office of Public and Indian Housing OMB No. 2577-0226 Expires 3/31/2024

# Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

I,	Malik D. Evans	, the Mayor of Rochester, New York
	Official's Name	Official's Title
fiscal y	ear 2025 of the Roche	n for fiscal years 2025-2029 and/or Annual PHA Plan for ester Housing Authority is consistent
with th	ie.	PILA Name
		dated Plan including the Analysis of Impediments (AI) to Fair Fair Housing (AFH) as applicable to the
	City of Ro	chester, New York
		Local Jurisdiction Name
pursua	nt to 24 CFR Part 91 and 24	CFR § 903.15.
	e a description of how the Pl Consolidated Plan.	HA Plan's contents are consistent with the Consolidated Plan or
		owing Consolidated Plan goals: Provide quality, affordable ousing stock, increasing the availability of affordable housing,
transit	ion homeless families into ho	ousing, empowerment of low/moderate income persons to
		homeownership where possible. Provide suitable living nod income residents throughout the City, and increase
housir	g opportunities.	
		I as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will it in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)
Name of A	uthorized Official: Malik D. Evan	Title: Mayor of Rochester, New York
Signature:	M	G/13/2024
Code, Sect	ion 1701 et seq., and regulations promulgated	velopment is authorized to solicit the information requested in this form by virtue of Title 12, U.S. thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information be information requested does not lend itself to confidentiality. This information is collected to

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

ensure consistency with the consolidated plan or state consolidated plan.

Page 1 of 1

form HUD-50077-SL (3/31/2024)

#### OMB Approval No. 2577-0157 (Exp. 1/31/2027)

# Certification of Payments to Influence Federal Transactions

Previous edition is obsolete

U.S. Department of Housing and Urban Development Office of Public and Indian Housing

Public reporting burden for this information collection is estimated to average 30 minutes, including the time for reviewing instructions, searching existing data sources, gathering and mointaining the data needed, and completing and reviewing the collection of information. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to the Reports Management Office, Office of Poley Development and Research, REE, Department of Housing and Union Development, 451 7th 5x 5W.

Room 4176, Washington, DC 20416-5000: When providing comments, please refer to GMB Approval No. 2577-4157.				
Applicant Name				
Rochester Housing Authority				
Program/Activity Receiving Federal Grant Funding				
The undersigned certifies, to the best of his or her knowledge and b	elief, that:			
<ol> <li>No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.</li> <li>If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.</li> </ol>	certific at all tunder sub rec This cereliance into. So or ente 31, U. certific \$10,000	the undersigned shall require that the language of this ation be included in the award documents for all subawards iters (including subcontracts, subgrants, and contracts grants, loans, and cooperative agreements) and that all ipients shall certify and disclose accordingly.  Trification is a material representation of fact upon which is was placed when this transaction was made or entered abmission of this certification is a prerequisite for making ring into this transaction imposed by Section 1352, Title S. Code. Any person who fails to file the required ation shall be subject to a civil penalty of not less than 0 and not more than \$100,000 for each such failure.		
Warning: HUD will prosecute false claims and statements. Conviction 1012; 31 U.S.C. 3729, 3802)				
Name of Authorized Official	Title			
Shawn D. Burr	Exe	cutive Director		
Signature		Date (mm/bd/yyyy)		
Du Sh		63/4/2024		

form HUD 50071 (01/14)

# DISCLOSURE OF LOBBYING ACTIVITIES

Approved by OMB 4040-0013

Complete this form to disclose lobbying activities pursuant to 31 U.S.C.1352

1. * Type of Federal Action:	2. * Status of Feder	al Action:	3. * Report Type:	
a. contract	a. bid/offer/applicati	on	a. initial filing	
b. grant	b. initial award		b. material change	
c. cooperative agreement	c. post-award			
d. loan				
e. loan guarantee				
f. loan insurance				
4. Name and Address of Reporting	Entity:			
Prime SubAwardee				
*Name Rochester Housing Authority		]		
*Street 1 675 West Main Street	S	treef 2		
*City Rochester	State NY: New York		Zip [14611	
Congressional District, if known:				
5. If Reporting Entity in No.4 is Subar	wardee, Enter Name	and Address of Pri	ime:	
6. * Federal Department/Agency:		7. * Federal Prog	ram Name/Description:	
US HUD Public Housing Office/Capital Imp				
		CFDA Number, if applica	bie:	
8. Federal Action Number, if known:		9. Award Amoun	t, if known:	
	\$			
10. a. Name and Address of Lobbying	g Registrant:			
Prefix *First Name RIUA does no	t retain a Lobbing Firm	Middle Name		
* / act Name		Suffix		
RMA does not retain a Lobbing Fir	n.			
* Street 1	St	reef 2		
*City	State		Zip	
b. Individual Performing Services (Incl.	uding address if different from No.	10a)		
Prefix *First Name N/A		Middle Name		
*Last Name N/A		Suffix		
* Street 1		treet 2		
33961 1		1961 2		
*City State Zip				
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact, upon which reliance was placed by the tier above when the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to				
the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.				
*Signature:				
an sim				
*Name: Prefix *First Nam	Shawn	Middle No	artie	
* Last Name		Suff	tx	
	Telestron III		2/4/24	
Title: Executive Director	Telephone No.: 5	85-697-3606	Date: 3/16/24	
Federal Use Only:	ALT THE ALT	A CONTRACTOR	Authorized for Local Reproduction Standard Form - LLL (Rev. 7-97)	

Date: 6/20/2023

The U.S. Department of Housing and Urban Development has received NY041: Rochester Ha's request dated 06-20-2023 to place 5 public housing unit(s) in Non-Dwelling: Administrative Uses status in IMS-PIC. The letter proposes the following units be designated as Non-Dwelling: Administrative Uses:

AMP#	PIC Unit #	Entrance #	Building #	<b>Effective Date</b>	<b>Expiration Date</b>
NY041000222	02B10127	001	0215	04-01-2023	04-01-2028
NY041000222	02B10129	001	0215	04-01-2023	04-01-2028
NY041000222	02B10130	001	0215	04-01-2023	04-01-2028
NY041000222	02B10131	001	0215	04-01-2023	04-01-2028
NY041000554	38 0005	005	3801	04-01-2023	04-01-2028

According to Notice PIH 2021-35, to convert a unit to the Administrative Uses sub-category, a PHA must submit documentation demonstrating its plan to use the unit on a regular basis for PHA business activities. The PHA must demonstrate that the administrative use is necessary to its operations and that it has considered alternatives that would not reduce units available for occupancy.

HUD's determination was based on the following: The PHA is requesting to use these units for office space.

Your request was reviewed in accordance with Notice PIH 2021-35. Based on the information available to us, the Department has *approved* NY041: Rochester Ha's request to place the identified unit(s) into the Administrative Uses sub-category, with the effective and expiration date(s) found above.

Administrative Uses units do not count as Eligible Unit Months and therefore do not receive full operating subsidy from HUD. Your PHA is reminded that if the units no longer meet the requirements outlined in Notice PIH 2021-35, they are not permitted to remain in this sub-category.

After receiving the written unit status approval, the PHA must formally submit the request to change the unit's sub-category in the IMS-PIC system. Once the submission is complete in IMS-PIC, notify our office to finalize. It has been a pleasure to assist in this important matter. Should you have any questions, please reach out to your assigned HUD Portfolio Management Specialist (PMS).

The list of concurrence is as follows:

Name	Date of Concurrence
Gallagher, Leah K	06-20-2023

Date: 6/20/2023

The U.S. Department of Housing and Urban Development has received NY041: Rochester Ha's request dated 06-20-2023 to place 5 public housing unit(s) in Non-Dwelling: Special Use: Other Resident Activities status in IMS-PIC. The letter proposes the following units be designated as Non-Dwelling: Special Use: Other Resident Activities:

AMP#	PIC Unit #	Entrance #	Building #	Effective Date	Expiration Date
NY041000222	02B10128	001	0215	04-01-2023	04-01-2028
NY041000222	02B10132	001	0215	04-01-2023	04-01-2028
NY041000222	02B10133	001	0215	04-01-2023	04-01-2028
NY041000222	02B10141	001	0215	04-01-2023	04-01-2028
NY041000334	06 0003	003	0601	04-01-2023	04-01-2028

According to 24 CFR § 990.145(a)(2) and Notice PIH 2021-35, to convert a dwelling unit to the Special Use: Other Resident Activities sub-category, a PHA must submit documentation demonstrating its plan to use the unit on a regular, on-going basis as part of a program for public housing resident services that are not otherwise covered in the other "Special Use" categories.

HUD's determination was based on the following:

The PHA is requesting to use these units for its Resident Council.

Your request was reviewed in accordance with 24 CFR § 990.145(a)(2) and Notice PIH 2021-35. Based on the information available to us, the Department has *approved* NY041: Rochester HA's request to place the identified unit(s) into the Special Use: Other Resident Activities sub-category, with the effective and expiration date(s) found above.

Special Use: Other Resident Activities units count as Eligible Unit Months and therefore receive full operating subsidy from HUD. Your PHA is reminded that if the units no longer meet the requirements outlined in Notice PIH 2021-35, they are not permitted to remain in this sub-category.

After receiving the written unit status approval, the PHA must formally submit the request to change the unit's sub-category in the IMS-PIC system. Once the submission is complete in IMS-PIC, notify our office to finalize. It has been a pleasure to assist in this important matter. Should you have any questions, please reach out to your assigned HUD Portfolio Management Specialist (PMS).

The list of concurrence is as follows:

Name	<b>Date of Concurrence</b>
Gallagher, Leah K	06-20-2023

# **ATTACHMENT 22**



Public Housing Management 140 West Avenue Rochester, New York 14611

ANNUAL PLAN 2026- 2031 MEETING MINUTES JANUARY 9, 2025 12:00 PM – 2:00 PM THOMAS F. MCHUGH ROOM

Executive Director, Shawn Burr began the meeting promptly at 12:00 pm. Mr. Burr welcomed Council Presidents, Council Members, Resident Commissioners, and staff to the meeting for planning the 2025 Annual Plan.

Mr. Burr explained how important it is for all of us to be involved in the collaboration of the Annual Plan. He stressed that everyone should share their ideas, talk to their neighbors, participate in the process, and attend as many meetings as possible.

Mr. Burr reviewed the Annual Plan Timeline that begun on January 2025 until its submission to HUD in early July 2025.

Operations Budget Requests were collected from all council members.

Operations Budget Requests were handed out to all council members. The deadline for all requests to be turned in from RAB is February 10, 2025.

The next meeting is scheduled for February 10, 2025, at 12:00 PM.

# MEETING SIGN-IN SHEET Meeting Date: 1/9/2025 12:00 PM - 2:00 PM

Project:	Annual Plan 2025-26	Meeting Date:	1/9/2025 12:00 PM - 2:00 PM
Facilitator:	Shawn Burr	Place/Room:	Thomas F. McHugh Training room

Name	Sign
Shawn Burr, Executive Director	en s.
Cynthia Herriot, Deputy Executive Director	Absent
Celeste Langston, Assistant Director of Public Housing	Clan
Danielle Huertas, Assistant Director of Leasing Operations	Ibsent
Kimberly Huffman, Finance Director	Absent
Loretha J. McCullough, HR Director	Bonli Cultar
Robert Croston, Jr., Interim Chief of Maintenance	lohat & Cutado
Melissa Berrien, FSS Director Resident Services	Absort
James Senger, Senior Property Rehabilitation Specialist	98
Julie Fox, Senior Property Rehabilitation Specialist	Lula Tos
Mariam Rodriguez-Machuca, Compliance Coordinador	Spainer De
Christal Webb, Property Manager of Public Housing	Whistal my
Lynette McGee, Property Manager of Public Housing	Lan
Angela Brown, Property Manager of Public Housing	Den Roser
Jaquanda Jones, Housing Manager of Public Housing	Absort
Daniel Long, Director of Development & Capital Projects	Ma De la
Lula Howard, KT Council President	Tula Howard
Dorothy Tucker, HRT Council President	Absent
Eugene Dickerson, University Tower Council President	sheert

Name	Sign
Florine Cummings, Commissioner	Donna & Shellow, VC
Robert Davis, Commissioner	Robert's Dwis
Renee Collins, Lake Tower Council President	Bence Callins
Diana Colon, Secretary to the Executive Director	Diang Colar
Romy Layz, Secretary to the PH Director	
Lisa Colon,	Flotin
Tileesia Sandur Prop. Mage.	Lyman
Tileesia Sandlin Prop. Mage.	Tillesia Sendle
V	,



#### **Public Housing Management**

140 West Avenue Rochester, New York 14611

ANNUAL PLAN 2026- 2031 MEETING MINUTES FEBRUARY 10, 2025 12:00 PM – 2:00 PM THOMAS F. MCHUGH ROOM

Executive Director, Shawn Burr began the meeting promptly at 12:00 pm. Mr. Burr welcomed Council Presidents, Council Members, Resident Commissioners, and staff to the meeting for planning the 2025 Annual Plan.

Mr. Burr explained how important it is for all of us to be involved in the collaboration of the Annual Plan. He stressed that everyone should share their ideas, talk to their neighbors, participate in the process, and attend as many meetings as possible.

Mr. Burr reviewed the Annual Plan Timeline that begun on January 2025 until its submission to HUD in early July 2025.

Operations Budget Requests were collected from all council members.

	Меет	ING SIGN-IN SHEET	r
Project:	Annual Plan 2025-26	Meeting Date:	2/10/2025 12:00 PM - 2:00 PM
Facilitator:	Shawn Burr	Place/Room:	Thomas F. McHugh Training room

Name	Sign
Shawn Burr, Executive Director	Bu de
Cynthia Herriot, Deputy Executive Director	Undhutter Feely
Celeste Langston, Assistant Director of Public Housing	Absent
Danielle Huertas, Assistant Director of Leasing Operations	Absent
Kimberly Huffman, Finance Director	Absent
Loretha J. McCullough, HR Director	Absent
Robert Croston, Jr., Interim Chief of Maintenance	Robert 2 Cutro
Melissa Berrien, FSS Director Resident Services	Shoent
James Senger, Senior Property Rehabilitation Specialist	3
Julie Fox, Senior Property Rehabilitation Specialist	Shsent
Mariam Rodriguez-Machuca, Compliance Coordinador	Absent
Christal Webb, Property Manager of Public Housing	Mistal Well
Lynette McGee, Property Manager of Public Housing	Spent
Angela Brown, Property Manager of Public Housing	Unda Brown
Tileesia Sandlin, Property Manager of Public Housing	Absent
Lisa Colon, Senior Housing Specialist of Public Housing	Fige Colon
Daniel Long, Director of Development & Capital Projects	Lleve Alex
Lula Howard, KT Council President	Tulo Howard
Dorothy Tucker, HRT Council President	Absent

Name	Sign
Eugene Dickerson, University Tower Council President	Spent
Florine Cummings, Commissioner	Harrie Cummin
Robert Davis, Commissioner	Robert & Dais
Renee Collins, Lake Tower Council President	Ramos a. Carena
Diana Colon, Secretary to the Executive Director	& Calei
Romy Layz, Secretary to the PH Director	





Property Management 140 West Avenue Rochester, NY 14611

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# Annual & Five-Year Plan 2025-2031 Budget Request

#### **SOUTH ZONE**

# **ITEM**

#### **DANFORTH TOWER EAST**

- Plumbing (replacing pipes)
- Update heating
- Central air
- Updated flooring throughout the building
- Unit remodel walk-in showers
- Elevator remodel
- Visual intercom system
- AI Security system- facial recognition, capability to call 911.
- Fob access/ or hand recognition to all shared locations- community room, laundry room, etc.
- Pool room
- Exercise room
- Security booths
- Gazebo
- Heated sidewalks
- Heated back parking lot due to slope
- 24 hr. security guard
- 504 Units (converted to current standards)
- Updated security cameras with more coverage
- Install plank flooring on all the floors
- seal and stripe parking lots

#### **DANFORTH TOWER WEST**

- Plumbing (replacing pipes)
- Update heating
- Central air
- Updated flooring throughout the building
- Unit remodel walk-in showers
- Elevator remodel

- Visual intercom system
- AI Security system- facial recognition, capability to call 911.
- Fob access / or hand recognition to all shared locations- community room, laundry room, etc.
- Exercise room
- Security booth
- New blinds the apartments
- All day Security
- Free internet
- Free Cable
- Fenced parking lot with control access
- Heated sidewalks
- 24 hr. security guard
- 504 Units (converted to current standards)
- Updated security cameras with more coverage
- electric stove
- gazebo
- video cameras for every floor
- seal and stripe parking lots

#### **Kennedy**

- AI Security system- facial recognition, capability to call 911.
- Fob access / or hand recognition to all shared locations- community room, laundry room, etc.
- Exercise room
- Plumbing (replacing pipes)
- Visual intercom system
- Heated sidewalks
- 24 hr. security guard
- 504 Units (converted to current standards)
- Updated security cameras with more coverage
- Install plank flooring on all the floors
- Seal and stripe parking lots
- remodel elevators

#### **University Towers**

- Plumbing (replacing pipes)
- Update heating
- Central air
- Updated flooring throughout the building
- Unit remodel walk-in showers
- Elevator remodel
- Visual intercom system
- AI Security system- facial recognition, capability to call 911.
- Fob access/ or hand recognition to all shared locations- community room, laundry room, etc.

- Exercise room
- 24 hr. security guard
- 504 Units (converted to current standards)
- Updated security cameras with more coverage
- seal and stripe parking lots

#### **Atlantic Town houses**

- remodel interior of the units
- Resident only access parking
- Central air
- security cameras

#### **Bronson Court**

- Remodel unit Interiors
- Resident only access parking
- Central air
- Security Cameras

#### Jonathan Child

- Heating
- Central Air

# **North Zone**

#### **Item**

#### **Hudson Ridge Tower**

- Install parking garage.
- Upgrade mailboxes in the lobby area of the building
- Painting of lobby area main entrance
- Replace hallways flooring throughout the building.
- Paint hallways throughout the building
- Day care for all residents
- Windows
- Paving parking lots
- Wi-Fi for the towers
- Parking lots sealing and stripping (both front and rear)
- Seating for gazebo
- Tables and chairs for library and community room
- Chairs for seniors (higher chairs)
- New stove and refrigerator for kitchen
- Paint dividers walls on the balcony

#### **Seneca Manor Drive**

- Install cameras throughout the site
- Siding upgrade on all units
- Sealing of all unit's driveways
- Sealing and striping of parking lot on site
- Repair of basement drain flood backup issues on the southside and eastside of the property
- Install lights in backyards

#### **Lexington Court**

- Sealing and striping oof site parking lot
- Update window enclosure on all entrances for building one, two and three
- Update entrance unit intercom systems
- Update site building entry door push bar mechanism
- Tractor for snow removal
- Bigger garage to store the tractor
- Update site entrance floors

#### **Glenwood Gardens**

- Sealing and striping of site parking lot
- Update patio storm windows
- Repaying of damaged parking lot area on site
- Repaving of damaged sidewalks area on site

## **Central Zone**

#### **Item**

#### **Lena Gantt Estate**

- Ceiling lights in bedroom & living rooms
- stainless steel appliances in kitchen
- energy efficiency water heater and furnace
- on and off switch for the hallway for the upstairs apartments
- doorbells for Upper Falls family units
- Cameras for the site
- Hardwood floors
- Landscaping for the site
- Upgrade/repair site amenities at site
- Add extra parking in the back lot near units from 88 142
- Repair/replace back patio concrete on Upper Falls units
- Repair/replace fencing at the back patios on Upper Falls

- Replace underground water supply

## **Lake Tower**

- new grills
- Tables and chairs for the community room
- flooring in apartments
- Paving and painting on parking lot
- new picnic tables
- New Blinds for the apartments
- install dog waste bag stations around the property.
- security cameras
- Rug runners for entrances and community room
- More poster boards for the community room
- Better lighting for the parking lot
- Upgrade loppy with new mailboxes
- Repair and seal floor in compactor room
- Upgrade tiles on all the building floors
- Repair/replace concrete wall along front sidewalk
- Replace front hand railing and concrete front walkway
- Upgrade entrance doors to the units
- Repair main drain line under the lobby

#### Bay, Casper, and Zimmer Street Site

- Seal and strip parking lots at site
- Purchase empty lots to provide extra parking for the site
- Replace siding at site on all the buildings and duplexes
- Replace storage sheds for units at the sites
- Renovate units and add more handicapped units

#### **Holland Townhouses**

- Install door gate.
- Install playground.
- Install new stoves in units.
- More security patrolling parking lots
- Add more parking spots to the site
- Install dumpster enclosures to the site
- Add handicap units to the site
- Upgrade interior of the units
- Roofs update
- Update dehumidifiers in the basements
- Replace storm door frames in brick facades and storm doors
- Remove /replace fencing around the site

- Update/repairs of baseman walls
- Replace siding throughout the site on all buildings

# **Scattered Sites**

# **Item**

# **Atkinson Court**

- Repair parking lots and new parking stripes
- Landscaping
- New vinal privacy fencing

#### 113 – 119 Barlett/Reynolds

- Roof replacements

#### <u>292 – 296 Tremont</u>

- Roof replacements
- New siding

#### 6-20 Fromm

- Remove concrete steps and install new composite steps
- Install vinyl railings

#### <u>14 – 20 Henry Street</u>

- New black top parking lot
- Install new steps from lot to yard
- Install new concrete sidewalks, remove black top
- Install new vinyl privacy fencing
- New landscaping and add flowers beds

#### 1 – 9 Hollister

- New black top parking lot
- New siding
- Install new decks for front entrances
- New windows and exterior front doors
- Remove chain link fence and install new vinyl

#### **Capsule Dwelling**

- Roof replacement
- New siding
- Landscaping and flower beds
- New exterior lighting

## 270 Lake Avenue Management office

- Planters for public entrances

#### **Item for 1-year and 5-year plan update**

- Seal and strip parking lots at all RHA Sites
- Signage project-Update all signage through-out all RHA sites per Hunt Engineer specifications. Working with CP/Dan Long
- Upgrade snow removal equipment through-out the maintenance department due to age and needs.
- More money for training of staff. With many new employees we will need more money for training and certifications that are needed for maintenance staff, working with Lead Base Paint renewals, OSHA 10-hour training and other training needs.

#### ATTACHMENT 23 NEW ACTIVITIES

B2. New activities

#### **Choice Neighborhood Initiative**

RHA intends to apply for future Choice Neighborhood Initiative Planning and/or Implementation Grant when the NOFA is released. RHA will coordinate efforts with the City and community partners. RHA has contracted with a consultant to perform a feasibility assessment to determine if the North Inner loop project will be eligible for a CNI application. RHA properties that will be considered, but not limited to are Holland Townhouse Apartments, Lena Gantt Estates, Harriet Tubman Estates, Scattered Sites, and Bay-Zimmer Apartments. RHA is proceeding with physical needs assessments to determine eligibility. If determined eligible, RHA intends to proceed with partnering with the City of Rochester, procuring a consultant, and working together to prepare and submit an application.

If the grant application is pursued, input will again be gathered from RHA residents and community stakeholders to shape the plan. RHA also intends to apply for an Implementation Grant to realize the transformation plan.

#### **GRANTS/FUNDING**

**Emergency Safety and Security** - RHA intends to apply for this grant when available. A priority for this grant application is to update security cameras and monitoring activities at public housing sites that have experienced an increase in criminal activity. Other funding opportunities for lead paint abatement and mold remediation will be sought after.

Emergency Solutions Grant (ESG) – RHA intends to apply for The City of Rochester and Monroe County's Emergency Solutions Grant funds intended to be used to meet the goal of alleviating or preventing homelessness. ESG service objectives must be designed to comply with and carry out the goals and initiatives of the City and the County. These new policies emphasize rapid re-housing to help people quickly regain stability in permanent housing after experiencing a housing crisis, support coordinated access and intake, and call for an effective data collection, performance measurement, and program evaluation system. Eligible populations to receive assistance through the ESG Program are organized into five categories: single men, single women, single parents with children, families, youth, and young adults.

NYS HOME Local Program, Small Rental Development Initiative (SDRI) – RHA intends to apply for NYS Small Rental Development Initiative if funds become available. Eligible projects include the rehabilitation of the acquisition and rehabilitation of, or the new construction of residential rental housing that is owned or will be owned and operated by the Developer-owner as HOME eligible rental housing for low-income households, throughout the required Period of Affordability (POA), typically 15 to 20 years. The project may contain 2 to 25 units and be one or more buildings on a single site or multiple sites under common ownership, management, and financing. Permanent and transitional housing, including group homes.

Substance Abuse & Mental Health Services Administration (SAMHSA) Grants for the Benefit of Homeless Individuals (GBHI) – RHA and community partners will be applying for the GBHI. The purpose of this program is to support the development and/or expansion of local implementation of a community infrastructure that integrates behavioral health treatment and services for substance use disorders (SUD) and co-occurring mental and substance use disorders (COD), permanent housing, and other critical services for individuals (including youth) and families experiencing homelessness.

<u>Lead-Based Paint Capital Fund Program (LBPCF)</u> - RHA intends to apply for the LBPCF. The purpose of the Lead-Based Paint Capital Fund Program is to help Public Housing Authorities (PHAs) identify and eliminate lead-based paint hazards in public housing. In accordance with Section 9 of the United States Housing Act of 1937 (42 U.S.C. 1437g) (1937 Act), and the Consolidated Appropriations Act, 2017.

<u>HUD Jobs Plus</u> - RHA intends to apply for this initiative if and when it becomes available. The application will be focused on the development of locally based, job-driven approaches that increase earnings and advance employment outcomes through work readiness, employer linkages, job placement, educational advancement, technology skills, and financial literacy for residents of public housing. The place-based Jobs Plus program addresses poverty among public housing residents by incentivizing and enabling employment through earned income disregards for working residents and a set of services designed to support work, including employer linkages, job placement and counseling, educational advancement, and financial counseling. Ideally, these incentives will saturate the target developments, building a culture of work and making working residents the norm. RHA intends to apply for the Jobs Plus program, Grant FY2024

RHA intends to apply for the Resident Opportunity and Self Sufficiency Education (ROED) grant.

**HUD Youth Homelessness Demonstration Program** – RHA and Community Partners will be applying for HUD's Youth Homelessness Demonstration Program if available again in 2022-23. The goal of the YHDP is to support up to 11 communities, at least 5 of which will be rural, in the development and implementation of a coordinated community approach to preventing and ending youth homelessness and sharing that experience with and mobilizing communities around the country toward the same end. The population to be served by this demonstration program is youth experiencing homelessness, including unaccompanied and pregnant or parenting youth, where no member of the household is older than 24.

Low Income Housing Tax Credits (LIHTC) – RHA will be applying for LIHTC through New York State Housing and Community Renewal's Qualified Allocation Plan. RHA will work with its development partner to identify the best LIHTC projects and funding to apply for with Fernwood Development, Glenwood Gardens, Holland Townhouses, and Harriet Tubman Estates projects. As other projects are identified, additional applications may be submitted.

<u>Public Housing Preservation Program (PHP)</u> - RHA will be applying to New York State Housing and Community Renewal's PHP if available in 2024-25. PHP is a partnership among HCR, HUD,

Federal Public Housing Authorities (PHAs) outside New York City, and private for-profit and non-profit developers to address the needs of these properties and assist PHAs in completing their plans to ensure the long-term sustainability of existing public housing units. HCR will coordinate with PHAs and HUD to develop and implement a five-year strategy to preserve public housing units, address their need for capital improvements, and ensure their continued affordability.

New York State Preservation Opportunity Program – Enterprise Community Partners, in conjunction with New York State, accepted proposals from housing authorities to request in-depth technical assistance to develop a preservation plan for a specific portfolio of affordable housing. RHA was awarded a grant and is working with our Grant Partner to create financing and development plans, produce various preservation options, and provide funding for physical needs assessments and early predevelopment and acquisition costs. RHA intends to apply again if the program is available in 2024-25.

#### DEVELOPMENT/CAPITAL PROJECTS

#### **Demolitions and/or Disposition**

RHA may demolish public housing units that are obsolete as to physical condition, location, or other factors, making them unsuitable for housing purposes, and no reasonable program of modifications to the property is cost-effective. De minimis demolitions of up to 5 units every five years are allowed under 24 CFR Part 970.

Attachment 20 addresses RHA's new activities regarding demolition and/or disposition of public housing properties.

#### **Development and Other Activities**

RHA meets regularly with the City to increase efforts to plan for and rehabilitate available properties in targeted neighborhoods, reducing blight, and increase access to services in the neighborhood. Planning efforts continue with respect to RHA and the City of Rochester's Annual and Comprehensive Plans, respectively.

RHA intends to increase its communication and planning efforts with staff, residents, resident councils, and neighborhood organizations.

RHA intends to increase joint ventures with community partners. We have been working with RMAPI as part of their Housing and Steering Committees. RHA looks forward to this continued collaboration as development opportunities become available.

RHA is planning the redevelopment of its public housing sites; Glenwood Gardens, Thomas St., Henry St., Edinburgh Street, Capsule Dwelling Apts, Hollister St. Apts, and the Bond/Hamilton Street complex. These redevelopment projects may increase or decrease the number of available public housing units, but overall, increase the number of affordable housing units. If the number is decreased, RHA intends to replace those units at locations to be determined. RHA has room in its Faircloth limit to do so. RHA intends to apply for Low Income Housing Tax Credits (LIHTC) and other sources of funding to redevelop Glenwood Gardens and other complexes as identified.

RHA intends to submit a Brownfield application for the Glenwood site and apply for supportive housing development funding while forming a partnership with a support agency.

RHA will be developing a parcel it owns between Fernwood Ave and Rosemary Drive into a four story, 65 unit building with an attached public library in the first phase. The second phase may consist of additional affordable housing units that align with the need of the neighborhood. The second phase will also include a Brownfield clean-up which RHA will apply for. RHA has applied for state and local funding for the first phase and intends to apply for the same for the second phase.

RHA also intends to develop a parcel it owns on Lexington Avenue adjacent to its Lexington Court Apartments site. The proposed development has yet to be determined but may be additional public housing units. The existing structures on the site will be demolished.

RHA may issue its own bonds for development activities and acquiring the property. RHA intends to apply for NYS funding opportunities for development and capital improvement activities.

RHA may create a non-subsidized (non-ACC) housing program and/or a non-profit wholly owned subsidiary for development and/or management.

RHA intends to develop a comprehensive plan to address the needs of its Scattered Site housing. The plan will include investing Capital Fund Program dollars in renovating scattered site properties based upon need.

RHA will identify additional Scattered Sites for Section 32 homeownership opportunities for public housing residents; housing choice vouched for Participants or other qualified persons based upon this order. These Scattered Site homes will have physical needs assessments performed, and repairs/renovations done accordingly to prepare the residents for successful homeownership.

RHA plans to target some of its scattered-site properties for disposition to support RHA's development opportunities.

RHA may dispose of targeted scattered-site units to developers for exchange of an agreed-upon number of the homes/units to be rehabilitated or constructed; most must remain affordable and available for public housing applicants or other RHA referrals.

RHA has retained the services of a Development Partner not only to assist RHA in obtaining funds to redevelop our properties but to recommend the best methods of ensuring the long-term viability of our housing stock. The partner is also responsible for community engagement and building staff capacity.

Attachment 20-3 addresses RHA's intent to investigate opportunities to participate in HUD's RAD program.

RHA is intending to introduce new training and cooperative projects involving Maintenance and Public Housing with regards to site improvements at our public housing sites and scattered site locations to perform unit upgrades.

#### **Capital Fund Program**

RHA will obligate and expend its Capital Fund Program grants on time and in accordance with HUD regulations.

RHA intends on using Capital Funds to further its mission of "Changing the Face of Public Housing." RHA will identify sites through a physical needs assessment process and prioritize the most strategic use of its Capital Funds to preserve its Public Housing stock. Capital Funds may also be used for development activities and will be used to renovate Scattered Site properties and prepare some for homeownership. RHA in redevloping its Bond/Hamilton site, Edinburg Street site, Thomas St., Henry St., and other locations around the city in coordination with the City Comprehensive Plan Strategies.

RHA will undertake several energy-saving initiatives and plans to participate in programs offered by NYSERDA, RG&E, and other organizations that offer energy incentives that can increase efficiencies and save energy costs for RHA and its residents.

RHA intends to investigate the benefit of solar at its public housing sites and development projects.

RHA plans to create a Force Account Team for the purposes of performing make-ready of vacant units in a timelier manner.

RHA intends to apply for participation in the Capital Fund Finance Program (CFFP).

The Capital Fund Program Annual and 5-year Plans are listed in Attachment 21.

# **LEASING OPERATIONS**

#### **Housing Choice Voucher Program**

The HCV program may provide incentives to low-income families to move into high-income areas. Incentives may include the HCV program paying for utility changeover or a stipend for moving expenses.

#### **Housing Choice Voucher Community Choice Demonstration**

RHA is participating in HUD's Community Choice Demonstration (formerly known as Mobility Demonstration) Voucher Program. The Community Choice Demonstration will allow participating Public Housing Authorities (PHAs) throughout the country to implement housing mobility programs by offering mobility-related services to increase the number of voucher families with children living in opportunity areas. In addition to offering mobility-related services, participating PHAs will work

together in their region to adopt administrative policies that further enable housing mobility, increase landlord participation, and reduce barriers for families to move across PHA jurisdictions through portability.

The HCV program intends to have tenant liaisons at properties with 50 and more participants. HCV tenant's needs and feedback will be shared with the programs by the tenant liaison. This will build communication with tenants, landlords, and programs. Programs will identify resources for liaisons to operate meetings, retrieve feedback, and provide an incentive to those selected to be liaisons.

#### **Project-Based Voucher Program**

At Project-Based Voucher sites with over 50 units, the RHA Leasing Operations Department may identify a PBV tenant to be a liaison for all the PBV tenants at the site. The PBV-identified liaison would be given training and tools to assist them in gathering information and resources to assist PBV tenants at the site to ensure quality housing.

RHA plans to adopt the Housing Opportunity through Modernization Act (HOTMA) allowance that the Project-Based and Veterans Administration Supportive Housing (VASH) Programs will provide vouchers to Family Unification Program applicants.

#### **Memorandum of Understandings**

RHA may implement a Memorandum of Understanding with local Community Partners to eliminate homelessness using public housing units or Section 8 vouchers. RHA intends to lease one new PH resident referred through the MOU to eliminate homeless to every three regular waiting list Applicants.

RHA intends to implement a Memorandum of Understanding with local partners for prisoner re-entry using public housing units or vouchers.

#### **Utilities**

RHA will explore the opportunity of sending Utility Assistance Payments (UAP) directly to the utility companies for Section Eight.

RHA plans to explore opportunities to utilize solar power to reduce utility costs.

#### **Trainings/Workshops/Classes**

#### RHA intends to:

- Partner with community agencies (for example: Housing Council at PathStone and Legal Assistance of Western New York) to have landlord workshops and Housing Fairs. The goal would be to assist landlords in operating their "small business" for issues that are directly related to being a Housing Choice Voucher landlord.
- Annually offer a presentation through Legal Assistance of Western New York (LawNY) to participants and landlords on best practices and Fair Housing.

 Conduct Landlord briefings monthly to provide answers and information to our Landlords/Owners.

#### **Participant Portal**

RHA intends to have kiosks available on site in the Housing Choice Voucher lobby for participants to use for their annual recertification, obtaining work verification, and receiving their updated status of their moving papers for a new unit.

# **APPLICATION PROCESSING and OFFERS**

RHA plans to utilize its Application Processing Staff to assist Property Management Offices with unit viewings and lease-ups. This will not only increase the offers to vacant units but will lead to increasing the unit occupancy rate and maintaining it at around the 96% occupancy threshold.

RHA intends to re-open its Public Housing 2, 3, and 4-bedroom Waiting Lists after finalizing the purge that was initiated on 1/22/24, RHA will explore different methodologies to shorten the screening time needed to qualify applicants for housing while at the same time maintain standards for quality candidates. RHA has reduced the number of unit choices of public housing from three to two.

Public Housing Applications are still being submitted through RHA's website as well as via a paper application.

The Application Processing Center is utilizing the new software program to request national criminal background checks for applicants who have resided outside of NYS within the past 5 years from the start of the applicant's prequalification screening; this has significantly reduced the time it takes to complete a criminal background check. It has reduced this process from 30 days to an average of 5 days, per request.

# RESIDENT SERVICES

RHA intends to start an annual scholarship for youth and adults to promote self-sufficiency.

RHA plans to create scholarship opportunities for public housing residents and HCV Participants utilizing partnerships and sponsoring various activities to obtain funds, including grants and unused resident participation funds.

RHA plans to create a building trades pre-apprenticeship program by partnering with various groups to provide hands-on training for public housing residents and HCV participants.

RHA will explore and create new partnerships and seek funding opportunities to create a Youth, Sports, and Fine Arts Chapter to enhance the outreach opportunities for youth to participate in routine and non-traditional leisure activities, including but not limited to golf, swimming, basketball, dance, performing arts, scuba diving, football, tennis, writing and much more.

RHA intends to create a partnership with Boys and Girls Clubs to enhance educational and service opportunities for public housing and HCV Participants on public housing sites.

RHA intends to create business opportunities for resident councils and/or the Jurisdiction-wide Resident Council or individual residents.

RHA intends to seek partners who will grow and assist family self-sufficiency initiatives.

RHA intends to partner with the City of Rochester on the Financial Empowerment Center (FEC) initiative, which will provide free financial services to residents and participants.

RHA intends to create a partnership with Boys Scouts and Girl Scouts to enhance educational and service opportunities for public housing and HCV Participants on public housing sites.

RHA intends to participate in the Envision Center demonstration, which offers HUD-assisted family's access to support services that can help them achieve self-sufficiency through a centralized hub of supports in the following four pillars: (1) Economic Empowerment, (2) Educational Advancement, (3) Health and Wellness, and (4) Character and Leadership.

RHA intends to offer positive rent reporting to assist families in improving their credit.

RHA intends to develop ways to create more opportunities for homeownership.

RHA intends to apply for grant opportunities to support family's self-sufficiency.

RHA will seek partner opportunities to support family's self-sufficiency.

#### Homeownership

RHA intends to fully Implement the Section 32 homeownership program as outlined in its Homeownership Plan. RHA intends to develop a post homeownership program to assist families in maintaining their homes and ensuring homeowners that they have somewhere to go for assistance when they need it. RHA intends to increase the utilization of homeownership vouchers and increase outreach efforts. RHA is also working with the City of Rochester to identify ways to work together in furthering each agency's homeownership programs and goals.

RHA intends to partner with agencies to further homeownership opportunities for residents and HCV participants.

#### **Housing Counseling**

RHA may partner with a local certified Housing Counseling agency for pre-and post-homeownership counseling.

RHA will seek partners to participate in Homeownership processes.

#### **PUBLIC HOUSING**

RHA intends to assess all Public Housing 504 and modified units to ensure they meet HUD standards and determine those that can meet ADA requirements.

RHA will continue its curb appeal campaign for public housing sites.

RHA may use unused (Tenant Participation Funds) Per Unit Monies (PUM) of developments without an active Resident Council to create a Youth Employment and Education Program (YEEP) for public housing residents.

RHA intends to acquire available properties for new public housing units within its Fair Cloth Limit, especially four and 5+ bedroom units.

RHA intends to perform an assessment of all its public housing scattered-site units and determine which single-family units will be designated for homeownership. Current residents will be given the first option to purchase the home. RHA may use capital funds and/or operating reserves to renovate designated public housing scattered site homes prior to being offered for homeownership.

RHA plans to improve the use of its community-based Computer Labs with faster service, new equipment and utilize Community Service hours to monitor computer labs.

RHA will continue its "Beautification Initiative" for all its developments that will enhance curb appeal throughout the property.

RHA will be requesting an additional two-year approval of the designated housing in December 2022 (see Attachment 7).

RHA is seeking the possibility of expanding its partnership with Family Services Communities to offer Enriched Housing at other Public Housing locations.

RHA is in the process of drafting a proposed Assistance/Companion Animal Policy for Public Housing Residents.

RHA plans to increase the number and frequency of social functions for its Public Housing residents.

HOTMA Over-Income Limit Provision: RHA has instituted HOTMA's provision establishing a 120%-of-AMI household income limit for public housing residents. After a household's income exceeds 120% of AMI for two consecutive years, RHA must terminate the household's tenancy within six months of the household's second income determination.

# **COMPLIANCE DIVERSITY AND INCLUSION**

• A Hotline service has been established for the purpose of confidential reporting of fraud to RHA.

• The Freedom of Information Law process has been streamlined. The public can now send their requests electronically via email and receive results faster.



# Certifications