

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 02/29/2016
	<p>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, 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.</p> <p>Applicability. 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 <u>do not</u> need to submit this form.</p> <p>Definitions.</p> <ol style="list-style-type: none"> (1) High-Performer PHA – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a higher performer on <u>both</u> of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing. (2) Small PHA – A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550. (3) Housing Choice Voucher (HCV) Only PHA – A PHA that administers more the 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing. (4) Standard PHA – A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments. (5) Troubled PHA – A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent (6) Qualified PHA – A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled. 	

A	PHA Information.																									
A.1	<p> PHA Name: <u>Housing Authority of the City of Pueblo</u> PHA Code: <u>CO002</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/2020</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning above) Number of Public Housing (PH) Units: <u>829</u> Number of Housing Choice Voucher (HCVs): <u>1,540</u> Total Combined Units/Vouchers: <u>2,369</u> PHA Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. PHAs must have the elements listed below in sections B and C 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. </p> <p> The following are the specific locations where the public may obtain copies of the 2020 Annual PHA Plan: </p> <div style="margin-left: 40px;"> <p>Housing Authority of the City of Pueblo Leasing Department 1414 N. Santa Fe Avenue, 10th Floor Pueblo, CO 81003</p> <p>Housing Authority of the City of Pueblo Central Management/Administrative Office 201 S. Victoria Avenue Pueblo, CO 81003</p> <p>Housing Authority of the City of Pueblo AMP 100/200 Management Office 2601 Crawford Street Pueblo, CO 81004</p> </div> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Programs Not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead HA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>						Participating PHAs	PHA Code	Program(s) in the Consortia	Programs Not in the Consortia	No. of Units in Each Program		PH	HCV	Lead HA:											
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B	Annual Plan Elements																																										
B.1	<p>Revision of PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <table border="0"> <thead> <tr> <th>Y</th> <th>N</th> <th></th> </tr> </thead> <tbody> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Statement of Housing Needs and Strategy for Addressing Housing Needs</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Financial Resources.</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Rent Determination.</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Operation and Management.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Grievance Procedures.</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Homeownership Programs.</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Community Service and Self-Sufficiency Programs.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Safety and Crime Prevention.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Pet Policy.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Asset Management.</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Substantial Deviation.</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Significant Amendment/Modification</td> </tr> </tbody> </table> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><u>Statement of Housing Needs:</u></p> <p><u>Waiting List for Public Housing:</u></p> <p>Total: 632 Extremely Low Income: 576-91% Very Low Income: 36-6% Families with children: 373-59% Elderly Families: 26-4% Families with Disabilities: 65-10% White: 297-47% Black/African American: 32-5% American Indian/Alaska Native: 2-0.32% Asian: 1-0.16% Native Hawaiian/Other Pacific Islander: 1-0.16% Hispanic: 297-47% Other: 2-0.32%</p>	Y	N		<input checked="" type="checkbox"/>	<input type="checkbox"/>	Statement of Housing Needs and Strategy for Addressing Housing Needs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Financial Resources.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Rent Determination.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Operation and Management.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Grievance Procedures.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Homeownership Programs.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Community Service and Self-Sufficiency Programs.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Safety and Crime Prevention.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Pet Policy.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Asset Management.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Substantial Deviation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Significant Amendment/Modification
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B.1	<p>Bedrooms:</p> <p>1 BR: 259-41%</p> <p>2 BR: 260-41%</p> <p>3 BR:88-14%</p> <p>4 BR: 19-3%</p> <p>5 BR:6-1%</p> <p>The waiting list has been closed for 3 months for 1 bedroom. The PHA does expect to reopen the list in the PHA Plan year.</p> <p><u>Waiting List for Section 8:</u></p> <p>Total: 620</p> <p>Extremely Low Income: 585-94%</p> <p>Very Low Income: 35-6%</p> <p>Families with children: 580-94%</p> <p>Elderly Families: 10-2%</p> <p>Families with Disabilities: 19-3%</p> <p>White: 217-35%</p> <p>Black/African American: 25-4%</p> <p>American Indian/Alaska Native: 6-1%</p> <p>Asian: 2-0.32%</p> <p>Native Hawaiian/Other Pacific Islander: 1-0.16%</p> <p>Hispanic: 360-58%</p> <p>Other: 9-1%</p> <p>The waiting list has been closed for 2 months. The PHA does expect to reopen the list in the PHA Plan year.</p> <p><u>Strategies for Addressing Housing Needs:</u></p> <p>Need: Specific Family Types: Families with Disabilities</p> <p>PHA shall target available assistance to Families with Disabilities by:</p> <ul style="list-style-type: none"> ▪ Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing ▪ Separating the current Public Housing wait list and have a stand-alone Section 504 ADA accessible wait list ▪ Apply for special-purpose vouchers targeted to families with disabilities, should they become available ▪ Employ admissions preference aimed at families with disabilities <p>PHA added” Separating the current Public Housing wait list to have a stand-alone Section 504 ADA accessible wait list”.</p>
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B.1

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions

Public Housing:

Preferences:

The PHA plans to employ the following admission preferences for admission to public housing:

<u>Priority</u>	<u>Preference</u>
<u>110</u>	- Victims of domestic violence
<u>110</u>	- Displacement due to federally declared disaster
<u>65</u>	- Working families and those unable to work because of age or disability
<u>100</u>	- Disabled Person(s)/Elderly

The PHA changed the Priority of each preference and added “Disabled Person(s)/Elderly” preference.

Maintaining Waiting List:

The Public Housing, one-bedroom waiting list was closed as of March 1, 2016. It is anticipated that this list will remain closed for the completion of the HACP’s fiscal year, December 31, 2019. The HACP will determine at that time whether to keep the list closed or not.

Occupancy:

Applicants and residents may use the following reference materials to obtain information about the rules of occupancy of public housing:

- PHA-resident lease
- The PHA’s Admissions and Continued Occupancy Policy
- PHA’s briefing seminars or written materials
- PHA website: www.hapueblo.org
- PHA Move-in Handbook

The PHA added “PHA Move-in Handbook”.

Deconcentration and Income Mixing:

The PHA has performed its annual deconcentration and income mixing analysis to determine if the PHA has any general occupancy public housing developments covered by the deconcentration rule. The analysis results follow:

The PHA does have general occupancy public housing developments covered by the deconcentration rule.

B.1	<p>None of the covered developments have average incomes that fall above or below the Established Income Range.</p> <p><u>Section 8:</u></p> <p><u>Waiting List Organization:</u></p> <p>The Section 8 waiting list is currently closed. The Housing Authority will reopen the waiting list as needed during FY 2020. The HACP is in the process of transitioning from a wait list to a lottery system, which will involve exhausting the current wait list.</p> <p><u>Search Time:</u></p> <p>The PHA does give extensions on standard 60-day period to search for a unit under the following circumstances:</p> <ul style="list-style-type: none"> ▪ Demonstration of extenuating circumstances ▪ Had not refused a suitable unit ▪ Reasonable accommodation for a disability <p>The PHA deleted “Extension will result in appropriate lease” and added “Reasonable accommodation for a disability”.</p> <p><u>Preferences:</u></p> <p>The PHA plans to employ the following admission preferences for admission to Section 8 tenant-based assistance:</p> <table border="0"> <thead> <tr> <th><u>Priority</u></th><th><u>Preference</u></th></tr> </thead> <tbody> <tr> <td><u>110</u></td><td>- Victims of domestic violence</td></tr> <tr> <td><u>110</u></td><td>- Involuntary Displacement (Federally declared disaster)</td></tr> <tr> <td><u>110</u></td><td>- Transfers from Project-Based Voucher Section 8 units</td></tr> <tr> <td><u>100</u></td><td>- Disabled Person(s)/Elderly</td></tr> </tbody> </table> <p>The PHA changed the Priority of each preference, deleted “Working families and those unable to work because of a disability” and added “Disabled Person(s)/Elderly” preference.</p>	<u>Priority</u>	<u>Preference</u>	<u>110</u>	- Victims of domestic violence	<u>110</u>	- Involuntary Displacement (Federally declared disaster)	<u>110</u>	- Transfers from Project-Based Voucher Section 8 units	<u>100</u>	- Disabled Person(s)/Elderly
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<u>110</u>	- Transfers from Project-Based Voucher Section 8 units										
<u>100</u>	- Disabled Person(s)/Elderly										

B.1**Financial Resources**

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2020 grants)		
a) Public Housing Operating Fund	3,733,541.00	
b) Public Housing Capital Fund	1,450,000.00	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	8,143,863.00	
f) Resident Opportunity and Self-Sufficiency Grants	44,343.00	
g) Community Development Block Grant		
h) HOME		
Other Federal Grants (list below)		
Section 8 New Construction (MPT)	432,870.00	Operating Expenses
Farm Worker Housing (USDA)	65,109.00	Operating Expenses
Section 8 Moderate Rehabilitation	793,523.00	Operating Expenses & HAP's
2. Prior Year Federal Grants (unobligated funds only) (list below)		
CO 06P002501-18	1,812,817.00	Public housing capital improvements
CO 06P002501-19	1,904,400.00	Public housing capital improvements
3. Public Housing Dwelling Rental Income	2,169,325.00	Public housing operations
4. Other income (list below)		
Non-dwelling rent	17,400.00	Public housing operations
Interest on Investments	1,345.00	Public housing operations
Other income: Legal fees, maintenance charges to tenants	68,210.00	Public housing operations
Late fees, NSF charges, etc.	17,560.00	Public housing operations
Non-dwelling rent	27,156.00	Public housing operations
Laundry commissions, vending machines, etc.	25,900.00	Public housing operations
5. Non-federal sources (list below)		
COCC Fee	102,250.00	Administration
Section 8 New Const. (MPT) Dwelling Rents	415,000.00	Operating Expenses
Farm Labor dwelling rents	38,600.00	Operating Expenses
Admin Fees	10,116.00	Operating Expenses
Interest Income on Mortgages	83,050.00	Operating Expenses
Interest Income & Other Income FLP, COCC	690.00	Operating Expenses
Total resources	\$21,357,068.00	

B.1**Rent Determination****Rent Re-determinations:**

Between annual income reexaminations, the tenant is required to report changes in income or family composition to the PHA such that the changes result in an adjustment to rent as follows:

- Any time the family experiences a change in income

The PHA changed from “an income increase” to “a change in income”.

Operation and Management**HUD Programs Under PHA Management:**

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	835	200
Section 8 Vouchers	1470	260
Section 8 Certificates	N/A	N/A
Section 8 Mod Rehab	124	25
Special Purpose Section 8 Certificates/Vouchers (list individually)		
VASH Vouchers	60	6
Public Housing Drug Elimination Program (PHDEP)	N/A	N/A
Other Federal Programs (list individually)		
Section 202	96	12
Section 8 New Construction	132	24
Low-Income Housing Tax Credit	303	50
U.S.D.A Rural Development	18	5

Management and Maintenance Policies:

The PHA has adopted the following policies that contain the Agency’s rules, standards, and policies that govern management, operation, and maintenance of the Public Housing and Section 8 assistance programs.

Public Housing Management:

- Admissions and Continued Occupancy Policy (ACOP)
- Grievance Procedures
- Termination and Eviction Policy

B.1	<ul style="list-style-type: none"> ▪ Transfer and Transfer Waiting List Policy ▪ Financial Policies (12) ▪ De-Concentration and Income Targeting Policy ▪ Pet Policy ▪ File Access Policy ▪ Resident Initiatives Policy ▪ Records Retention Policy ▪ Security Policy ▪ Community Service Policy ▪ Enterprise Income Verification (EIV) Security Policy ▪ Maintenance Procedures Manual ▪ Preventive Maintenance Policies and Procedures ▪ Section 504 Grievance Procedure ▪ Section 504 Reasonable Accommodations Policy and Procedure ▪ Smoke Free Policy ▪ VAWA Policy <p>PHA added the following:</p> <ul style="list-style-type: none"> ▪ Section 504 Grievance Procedure ▪ Section 504 Reasonable Accommodations Policy and Procedure ▪ Smoke Free Policy ▪ VAWA Policy <p>Homeownership Programs</p> <p><u>Section:</u></p> <p>The PHA does administer a homeownership program for Section 8.</p> <p><u>Program Description:</u></p> <p>The PHA will limit the number of families participating in the Section 8 homeownership option to 26-50 participants (Currently 32)</p> <p>The PHA has not established criteria for participation in its Section 8 homeownership option program in addition to HUD criteria.</p> <p>Community Service and Self-Sufficiency Programs</p> <p><u>Services and programs offered to residents and participants by the PHA:</u></p>
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B.1**Economic and Social Self-Sufficiency Programs:**

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
Neighborhood Network Center	50-75/wk.	Special Criteria	Development Office	Public housing and Section 8

PHA added Section 8 to the eligibility to participate.

Family Self-Sufficiency Programs:

Family Self Sufficiency (FSS) Participation		
Program	Required Number of Participants	Actual Number of Participants (As of: 08/19/2019)
Public Housing	5	35
Section 8	0	39

Community Service Implementation Report:

- Number of tenants required to perform community service: 1
- Number of tenants performing community service: 1
- Number of tenants granted exemptions:
- Number of tenants in non-compliance: 0
- Number of tenants terminated/evicted due to non-compliance: 0

Substantial Deviation/Significant Amendment or Modification**Substantial Deviation**

- Additions or deletions of Strategic Goals
- Any deviation that requires reviews and input by the Resident Advisory Board as well as approval by the Board of Commissioners.

Significant Amendment/Modification

- Any change to rent or admissions policies or organization of the waiting list;
- Additions of non-emergency* work items over \$25,000 (items not included in the latest approved Capital Fund Annual Statement or 5-Year Action Plan); and

B.1

- Any change with regard to a proposed demolition, disposition, designation of housing, homeownership, Capital Fund Financing, development, mixed financing, RAD, or any other conversion activities.

An exception to this definition will be made for any of the above that are adopted to reflect changes in HUD regulatory requirements since such changes are not considered significant.

This criterion does not supersede the requirements of 2 CFR Part 200 (Administrative Requirements for Grants and Cooperative Agreements), as well as federal, state, or local regulations or statutes.

Any future issuance of HUD guidelines or additional regulations shall take precedence over the above criterion.

* Emergency – means physical work items of an emergency nature, posing an immediate threat to the health and safety of residents or staff, which must be completed within one year of capital grant funding. Management improvements are not eligible as emergency work.

Violence Against Women Act (VAWA)
(See attachment co002d01)

- (c) The PHA must submit its Deconcentration Policy for Field Office review (See attachment co002b01).

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 | |
|-------------------------------------|-------------------------------------|--|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Hope VI or Choice Neighborhoods. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Mixed Finance Modernization or Development. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Demolition and/or Disposition. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Designated Housing for Elderly and/or Disabled Families. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Conversion of Public Housing to Tenant-Based Assistance. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Conversion of Public Housing to Project-Based Assistance under RAD. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Occupancy by Over-Income Families. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Occupancy by Police Officers. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Non-Smoking Policies. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Project-Based Vouchers. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Units with Approved Vacancies for Modernization. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). |

- B.2** (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

Demolition and/or Disposition

The PHA plans to conduct demolition or disposition activities in the plan Fiscal Year, depending on the availability of funding.

The Housing Authority will use Capital Funds for demolition and asbestos abatement at the Sangre de Cristo Apartments.

Demolition/Disposition Activity Description
1a. Development name: Sangre de Cristo
1b. Development (project) number: CO0020000100
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input type="checkbox"/>
3. Application status (select one) Approved <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date application approved , submitted, or planned for submission: <u>Phased Project – 04/13/2015, 05/30/2018 and 06/26/2018</u>
5. Number of units affected: 212
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: <u>10/01/2018</u> b. Projected end date of activity: <u>Phased demolition</u>

B.2

Demolition/Disposition Activity Description
1a. Development name: Hyde Park Community Center
1b. Development (project) number: CO0020000400
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: Not Determined
5. Number of units affected: N/A
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development (Community Center) <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: Not Determined b. Projected end date of activity: Not Determined

Demolition/Disposition Activity Description
1a. Development name: AMP 300 Scattered Site – 508 W. 14th 080056
1b. Development (project) number: CO0020000300
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: Not Determined
5. Number of units affected: 1
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development (508 W. 14th 080056) <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: Not Determined b. Projected end date of activity: Not Determined

The Housing Authority of the City of Pueblo's (HACP) strategic plan is to demolish the Sangre de Cristo Apartments, CO002000100. This 212-unit public housing development was built in 1952 and has been determined to be severely distressed. The plan includes the revitalization of the area with the replacement of approximately 157 units on the original site and 72 units on land donated by the City adjacent to the project. The Housing Authority may participate with Section 18 and RAD Blending (Comprehensive Rehabilitation/Replacement through Rental

B.2	<p>Assistance Demonstration) on the phased RAD project demolishing and rebuilding the Sangre de Cristo Apartments. Through Section 18 and RAD Blending, the Housing Authority may demolish 25 percent of the assisted units in the Sangre de Cristo Apartments, without rebuilding the same number of units through RAD. Any residents impacted would be issued a Tenant Protection Voucher. PIH Notice 2018-04 permits certain properties to demolish or dispose of qualifying units when a PHA is converting at least 75 percent of the public housing units within a project (as project is defined by RAD) under RAD and meets the requirements of the RAD Final Implementation.</p> <p>Demolition and replacement are contingent upon the PHA securing funding through a variety of sources such as:</p> <ul style="list-style-type: none"> ▪ Rental Assistance Demonstration Program (RAD) ▪ Capital Find Financing Program (CFP) ▪ Operating Fund Financing Program (OFFP) ▪ Replacement Housing Factor Funds (RHF) ▪ Low-Income Housing Tax Credits (LIHTC) ▪ Community Development Block Grant (CDBG) ▪ State and Local HOME Funds ▪ Federal Home Loan Bank Grant ▪ FHA 221(d)(4) Loan Program <p>Conversion of Public Housing to Project-Based Assistance under RAD</p> <p>The PHA applied to participate in the “Rental Assistance Demonstration” (RAD) program on November 6, 2013. On March 19, 2015, the Housing Authority was notified that its application was “approved”.</p> <p>Through the use of the RAD program the PHA hopes to be able to demolish all 212 units in AMP 100 and by using the Low-Income Housing Tax Credit Program, newly construct a less dense community with more efficient units.</p> <p>Occupancy of Over-Income Families</p> <p>Significant Amendment to the PHA Plan: Public Housing Income Limit</p> <p>Section 103 of the Housing Through Modernization Act of 2016 (HOTMA) amends section 16(a) of the United States Housing Act of 1937 (42 U.S.C. 1437n(a) to place an income limitation on public housing tenancy for families. The law requires the PHA to terminate assistance of over-income families.</p> <p>After a family’s income has exceeded 120% of the area median income (AMI) (or a different limitation established by the Secretary) for two consecutive years, the PHA must terminate the family’s tenancy within 6 months of the second income determination or charge the family a monthly rent equal to the greater of (1) the applicable Fair Mart Rent, or (2) the amount of</p>
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<p>B.2</p>	<p>monthly subsidy for the unit including amounts from the operating and capital fund, as determined by regulations.</p> <p>Non-Smoking Policies (See attachment co002c01)</p> <p>Project-Based Vouchers</p> <p>Our agency is currently operating or intends to operate a Section 8 Project Based Voucher Program.</p> <p>Current number of units: <u>34</u></p> <p><u>General location(s) (eligible census tracts or area within eligible census tracts):</u></p> <p>Central Grade, Palo Verde, and Ashwood Apartments</p> <p>HACP to add if Rescue Homeless Mission secure funds, 10 PBV units and 10 VASH Project-Based Vouchers.</p> <p><u>How is this action consistent with the PHA Plan? Include the reasons why project basing instead of tenant basing the same number of units is appropriate.</u></p> <p>Rehabilitation of substandard housing and development of additional affordable housing. The PHA continues to research other projects that would enhance or increase the affordable housing inventory through the use of Project Based Voucher assistance.</p>
	<p>B.3</p> <p>Civil Rights Certification.</p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. (See HUD-50077-ST-HCV-HP – attachment co002e01)</p>
	<p>B.4</p> <p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe: There were four (4) findings in the most recent fiscal year audit (2018) as follows:</p>

B.4	<ol style="list-style-type: none"> 1) There was a Material Weakness found in Internal Control over Financing Reporting 2) There was one expenditure that was identified as being charged to the incorrect Public Housing AMP 3) There was a deficiency found in the Section 8 Moderate Rehabilitation Program and new Construction. During the tenant file audit, there were four (4) instances where a tenant's income was not re-verified and an additional three (3) instances where there was a missing or incomplete checklist. 4) There was a deficiency found in the Indian and Public Housing Program. During the tenant file audit, there were no identified controls in place to re-check tenant files. There were four (4) instances with incorrect tenant rent calculations.
B.5	<p>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.</p> <p>PHA GOAL #1: EXPAND THE SUPPLY OF ASSISTED HOUSING</p> <p>The PHA established the following objectives to strive in meeting goal #1:</p> <ul style="list-style-type: none"> ▪ Apply for additional rental vouchers ▪ Reduce public housing vacancies ▪ Leverage private or other public funds to create additional housing opportunities <p><u>Progress Statement:</u> The Housing Authority of the City of Pueblo has successfully leveraged private and other public funds to build the 72-unit Uplands Townhomes. The Uplands Townhomes are the first of a four phased project to convert a 212-unit public housing development, the Sangre de Cristo Apartments. This is being completed through HUD's Rental Assistance Demonstration Program, which allows owners to convert public housing to Section 8 assistance. Additionally, there has been a strong effort to both reduce public housing vacancies and reduce the amount of time a unit is vacant.</p> <p>PHA GOAL #2: IMPROVE THE QUALITY OF ASSISTED HOUSING</p> <p>The PHA established the following objectives to strive in meeting goal #2:</p> <ul style="list-style-type: none"> ▪ Improve public housing management ▪ Improve voucher management ▪ Increase customer satisfaction ▪ Concentrate on efforts to improve specific management functions ▪ Renovate or modernize public housing units ▪ Demolish or dispose of obsolete public housing ▪ Provide replacement public housing ▪ Provide replacement vouchers <p><u>Progress Statement:</u> The Housing Authority of the City of Pueblo is actively trying to improve every customer's experience. A new software system was adopted in 2019 that has the ability</p>

B.5	<p>for a client and landlord portal, online payments, online statements and other user-friendly features. The Housing Authority of the City of Pueblo is confident that these portals will provide customers with convenience they did not have prior, by allowing them to upload documents directly to the portal rather than bringing them in person.</p> <p>PHA GOAL #3: INCREASE ASSISTED HOUSING CHOICES</p> <p>The PHA established the following objectives to strive in meeting goal #3</p> <ul style="list-style-type: none"> ▪ Provide voucher mobility counseling: Staff will conduct orientation sessions for 100% of new issues in the future ▪ Continue outreach efforts to potential voucher landlords ▪ Implement public housing or other homeownership programs <p><u>Progress Statement:</u> All Section 8 Voucher recipients and Public Housing program recipients are given orientation prior to move-in. Outreach to new landlords has been done through the local Apartment Association. Homeownership counseling is offered to residents who are enrolled in our Family Self-Sufficiency program.</p> <p>PHA GOAL #4: PROVIDE AN IMPROVED LIVING ENVIRONMENT</p> <p>The PHA established the following objectives to strive in meeting goal #4</p> <ul style="list-style-type: none"> ▪ Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments ▪ Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments ▪ Implement public housing security improvements <p><u>Progress Statement:</u> Measures to deconcentrate poverty by bringing higher income public housing households is a goal of the Housing Authority of the City of Pueblo. Additional security improvements have been implemented in Public Housing through increasing lighting at several developments and adding security officers to high crime areas.</p> <p>PHA GOAL #5: PROMOTE SELF-SUFFICIENCY AND ASSET DEVELOPMENT OF ASSISTED HOUSEHOLDS</p> <p>The PHA established the following objectives to strive in meeting goal #5</p> <ul style="list-style-type: none"> ▪ Provide or attract supportive services to improve assistance recipients' employability ▪ Provide or attract supportive services to increase independence for the elderly or families with disabilities ▪ Partnership with local agencies to provide or attract supportive services to assist victims of domestic violence move out of abusive situations and began again <p><u>Progress Statement:</u> The Housing Authority of the City of Pueblo has made great effort to ensure all residents have access to services provided within the Pueblo Community. Annually, a Kids Safety Fair is held where community resources are available to assist residents.</p>
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B.5	<p>Additionally, the Family Self-Sufficiency program coordinator pairs residents in need with community resources.</p> <p>PHA GOAL #6: ENSURE EQUAL OPPORTUNITY AND AFFIRMATIVELY FURTHER FAIR HOUSING</p> <p>The PHA established the following objectives to strive in meeting goal #6</p> <ul style="list-style-type: none"> ▪ Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status and disability ▪ Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status and disability ▪ Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required <p>Progress Statement: The Housing Authority of the City of Pueblo (HACP) has taken measures to ensure equal access to housing regardless of race, color, religion, national origin, sex, familial status or disability. The HACP has rehabilitated Section 504 ADA-accessible units to meet the newer more stringent guidelines.</p>
B.6	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan? (See attachment co002a01)</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. <i>N/A</i></p>
B.7	<p>Certification by State or Local Officials.</p> <p><i>Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan. (See attachment co002e01)</i></p>

B.8	<p>Troubled PHA.</p> <p>a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe: <i>N/A</i></p>
C.	<p>Statement of Capital Improvements. Required for all PHAs completing this form that administers public housing and receive funding from the Capital Fund Program (CFP).</p>
C.1	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>See HUD Form 50075.2 approved by HUD on <u>09/17/2017</u></p>
	<p>Challenged Elements. No Challenged Elements</p>

Attachment: co002a01
Housing Authority of the City of Pueblo
Resident Advisory Board Consultation Process and Comments – FYB 2020

1. Resident notification of appointment to the Advisory Board

At beginning of PHA Plan process, sent out letter to all residents/participants of opportunity to serve on Resident Advisory Board

2. Resident Advisory Board Selection

Selection made from resident/participant response

3. Meeting Organization

Schedule date to meet with Resident Advisory Board for input to PHA Plan

Notify Resident Advisory Board of scheduled meeting

Hold Resident Advisory Board meetings **August 22, 2019, September 5, 2019 and September 17, 2019**

4. Notification of Public Hearing

Schedule date for Public Hearing and place ad **August 11, 2019**

Notify Resident Advisory Board

Hold Public Hearing meeting **September 26, 2019**

5. Documentation of resident recommendations and PHA's response to recommendations

There were no comments/recommendations received.

Attachment: co002b01

**Housing Authority of the City of Pueblo
Deconcentration Policy**

DE-CONCENTRATION AND INCOME TARGETING POLICY

**FOR THE
HOUSING AUTHORITY OF THE CITY OF PUEBLO
PUEBLO, COLORADO**

Adopted by Board of Commissioners

Resolution No.:_____

Date of Adoption:_____

DE-CONCENTRATION AND INCOME TARGETING POLICY
(of the Public Housing Admissions and Occupancy Policy)

Sub-Title A, Section 513 of the Quality Housing and Work Responsibility Act of 1998 (QHWRA), establishes two interrelated requirements for implementation by Public Housing Authorities: (1) Economic De-concentration of public housing developments and (2) Income Targeting to assure that families in the “extremely low” income category are proportionately represented in public housing and that pockets of poverty are reduced or eliminated. In order to implement these new requirements the PHA must promote these provisions as policies and revise their Admission and Occupancy policies and procedures to comply.

Therefore, the Housing Authority of the City of Pueblo, Pueblo, Colorado (hereinafter referred to as PHA) hereby affirms its commitment to implementation of the two requirements by adopting the following policies:

A. Economic De-concentration:

Admission and Continued Occupancy Policies are revised to include the PHA’s policy of promoting economic de-concentration. Implementation of this program may require the PHA to determine the median income of residents in each development, determine the average income of residents in all developments, compute the Established Income Range (EIR), determine developments outside the EIR, and provide adequate explanations and/or policies as needed to promote economic de-concentration.

Implementation may include one or more of the following options:

- Skipping families on the waiting list based on income;
- Establishing preferences for working families;
- Establish preferences for families in job training programs;
- Establish preferences for families in education or training programs;
- Marketing campaign geared toward targeting income groups for specific developments;
- Additional supportive services;
- Additional amenities for all units;
- Flat rents for developments and unit sizes;
- Different tenant rent percentages per development;
- Different tenant rent percentages per bedroom size;
- Saturday and evening office hours;
- Security Deposit waivers;
- Revised transfer policies;
- Site-based waiting lists;
- Mass Media advertising/Public service announcements; and
- Giveaways.

B. Income Targeting

As public housing dwelling units become available for occupancy, responsible PHA employees will offer units to applicants on the waiting list. In accordance with the Quality Housing and Work Responsibility Act of 1998, the PHA encourages occupancy of its developments by a broad range of families with incomes up to eighty percent (80%) of the median income for the jurisdiction in which the PHA operates. Depending on the availability of applicants with proper demographics, at a minimum, 40% of all new admissions to public housing **on an annual basis** may be families with incomes at or below thirty percent (30%)(extremely low-income) of the area median income. The offer of assistance will be made without discrimination because of race, color, religion, sex, national origin, age, handicap or familial status.

In order to implement the income targeting program, the following policy is adopted:

- The PHA may select, based on date and time of application and preferences, two (2) families in the extremely low-income category and two (2) families from the lower/very low-income category alternately until the forty percent (40%) admission requirement of extremely low-income families is achieved (2 plus 2 policy).
- After the minimum level is reached, all selections may be made based solely on date, time and preferences. Any applicants passed over as a result of implementing this 2 plus 2 policy will retain their place on the waiting list and will be offered a unit in order of their placement on the waiting list.
- To the maximum extent possible, the offers will also be made to effect the PHA's policy of economic de-concentration.
- The PHA reserves the option, at any time, to reduce the targeting requirement for public housing by no more than ten percent (10%), if it increases the target figure for its Section 8 program from the required level of seventy-five percent (75%) of annual new admissions to no more than eighty-five percent (85%) of its annual new admissions. (Optional for PHAs with both Section 8 and Public Housing programs.)

NOTICE

The Nelrod Company has made its best effort to comply with regulations, laws, and Federal/local policies. The Nelrod Company does not offer advice on legal matters or render legal opinions. We recommend that this policy be reviewed by the Housing Authority's general counsel and/or attorney prior to approval by the Board of Commissioners.

The Nelrod Company is not responsible for any changes made to these policies by any party other than the Nelrod Company.

Attachment: co002c01

**Housing Authority of the City of Pueblo
Smoke-Free Policy**

Housing Authority of the City of Pueblo, CO

Smoke-Free Policy

Background

According to the American Lung Association, cigarette smoking is the number one cause of preventable disease in the United States. The elderly and young populations, as well as people with chronic illnesses, are especially vulnerable to the adverse effects of smoking and secondhand smoke. The EPA has identified secondhand smoke as a Class A carcinogen. A class A carcinogen is a cancer causing agent. Allowing smoking within dwelling unit(s) exposes all residents and site staff to these known carcinogens.

Smoking is a leading cause of residential fires and the number one cause of fire deaths in the U.S. Some insurance companies offer discounts on property casualty insurance for multi-unit owners with a 100% smoke-free policy.

Dwelling unit turnover costs can be two to seven times greater when smoking is allowed. The Pueblo City/County Health Department survey reports that the majority of residents would like:

- smoking banned in all units,
- some type of outside smoking area;
- to have the new smoke-free policy put into action within 12 months.

Definitions

For the purpose of this document we will use the **following definitions**:

- ❖ Smoke-Free Campus is a property/site that does not allow smoking, of any kind, anywhere on the property/site. All smoking must take place offsite.
- ❖ Smoke-Free Policy where smoking had been allowed in the past but, at the time of implementation, smoking will be allowed in designated areas or 25 feet from the building.

Purpose of Smoke-Free Policy:

1. To mitigate the irritation and known health effects of secondhand smoke.
2. Minimize the maintenance, cleaning, and redecorating costs associated with smoking.
3. Decrease the risk of smoking-related fires to property and personal safety.
4. To allow all staff the opportunity to perform their job duties in an environment that is smoke-free.

Proposed Policy

It is proposed that all HACP properties implement a smoke-free policy, which will become effective April 1, 2018.

Properties that will implement the smoke-free policy include, but not limited to:

- ❖ All HACP Public Housing units and Administrative Offices including but not limited to the Vail Hotel, Mesa Tower, Minnequa Apartments, Sangre de Cristo Apartments, Richmond Apartments, Union Plaza and the Uplands Townhomes.

Smoke-Free Areas

Smoking will not be permitted in **individual dwelling units** or the **common spaces** of a HACP community or facility of any type, unless otherwise specified.

Definition of smoking: The term "smoking" means inhaling, exhaling, breathing or carrying any lit cigar, cigarette, Electronic Nicotine Delivery System (hookahs, ENDS or e-cigs), or other tobacco product or similar product that involves the ignition and burning in any manner or in any form. This includes the use and/or smoking of **ANY** marijuana products on HACP properties.

- ❖ **Individual dwelling units** are defined as the interior and exterior spaces tied to a particular unit. This includes, but is not limited to, bedrooms, hallways, kitchens, bathrooms, patios, balconies and unit entryway areas.
- ❖ **Common spaces** are defined as areas within the building that are open to the public, including but not limited to sport courts, playgrounds, community rooms, community bathrooms, community kitchens, lobbies, reception areas, hallways, laundry rooms, reception areas, stairways, offices and elevators, and within 25 feet outside of building(s) including entry ways, windows, porches, balconies, courtyard and patios.
- ❖ **Designated smoking areas** will be indicated on each property's map or 25 feet from any HACP building.

Those affected by the smoke-free policy

This policy applies to everyone (residents, guests, visitors, service personnel and HACP employees) who visits, lives and works at HACP properties.

Resident Responsibility

1. It shall be the resident's responsibility to inform his/her household members, and guests of this Smoke-Free Policy.
2. The resident shall prohibit smoking by his/her household members or guests while on the premises that would violate this policy.

3. Failure to comply or upon repeated violations to this policy may be cause for lease enforcement action up to and including termination of resident tenancy.

Smoke-Free Signage

HACP properties (as indicated) and administrative offices shall post signs that reference the smoke-free policy that are accessible to all residents, visitors, and HACP employees (including persons with disabilities).

Enforcement for Residents

If a resident or employee complains about being bothered by smoke or knows of another resident who has violated the policy, the HACP Management team will investigate the claim and determine if the following steps need to be taken:

- ❖ 1st Violation - Site staff will investigate and document whether or not (s)he smelled or witnessed, or has other evidence that the resident has smoked inside the unit or other prohibited area. Staff will follow-up the visit with a letter acknowledging the conversation and the outcome. ("Friendly Warning Letter")
- ❖ 2nd Violation - If the problem repeats, HACP staff may issue a Lease Violation notice, and issue a \$25.00 fine. HACP staff may also schedule inspections to ensure compliance.
- ❖ 3rd Violation – Another repeat violation will result in a Lease Violation, Cease & Desist notice, and an additional \$25.00 fine.
- ❖ 4th Violation – If the violation persists, a Notice of Lease Termination may be issued and the resident may be fined a \$25.00 fine per occurrence.

If the HACP pursues lease enforcement as a remedy, public housing residents retain their right to an informal or formal hearing before their tenancy is terminated.

In addition, if the resident does not have any repeated violations within one (1) year, the Smoke-Free Policy automatically resets and any new violations will follow the graduated enforcement procedures listed above.

Attachment: co002d01

**Housing Authority of the City of Pueblo
Violence Against Women Act (VAWA)
Policy**

Housing Authority of the City of Pueblo
Violence Against Women Act (VAWA) Policy
Addendum to Current ACOP and Section 8 Administrative Plan

PURPOSE: The purpose of this policy is to implement the applicable provision of the Violence Against Women and Department of Justice Reauthorization Act of 2005 (VAWA) (Pub. L. 109-162). This amendment sets forth the Housing Authority of the City of Pueblo (PHA) policies and procedures to assist PHA staff to implement the applicable provisions of VAWA while maintaining a safe environment for the housing authority, its employees, residents, applicants, program participants and others who may be affected by the violence.

APPLICABILITY: This policy shall be applicable to the federally subsidized programs administered by the Housing Authority of the City of Pueblo, public housing and Section 8 HCV programs under the U.S. Housing Act of 1937 (42 U.S.C. § 1437 *et seq.*). *This policy is gender-neutral; the protections afforded under the policy are available to males who are victims of domestic violence, dating violence, sexual assault or stalking as well as female victims of such violence.*

GOALS AND OBJECTIVES: It is the PHA intent to maintain compliance with all applicable requirements imposed by VAWA and thus assist in possibly reducing domestic violence, dating violence, sexual assault and stalking, and homelessness.

These PHA goals and objectives efforts shall include to:

- Provide and maintain housing opportunities for victims of domestic violence, dating violence, sexual assault or stalking

- Create and maintain collaborative partnerships between PHA, victim service providers, law enforcement authorities, and other supportive groups to promote the safety and well-being of victims of domestic violence, dating violence, sexual assault or stalking (whether actual or imminent threat) who are assisted by PHA;
- Ensure the physical safety of victims of domestic violence, dating violence, sexual assault or stalking (whether actual or imminent threat) who are assisted by PHA;
- Maintain compliance with all applicable requirements imposed by VAWA.
- Take appropriate action in response to an incident or incidents of domestic violence, dating violence, sexual assault or stalking, affecting families or individuals assisted by PHA.

POLICY PROVISIONS

I. Notification Requirements

The PHA shall provide written notification to applicants, tenants, and Section 8 participants, owners, landlords or agents of the rights and obligations imposed under the VAWA relating to denial of assistance, confidentiality, and termination of tenancy or assistance. Written notifications shall be provided in briefing materials for waitlist applicants, at the annual re-examination for current public housing tenants and current participants in the housing choice voucher programs.

II. Denial of Admission

The PHA shall not deny admission to an applicant or participant who is or has been a victim of domestic violence, dating violence, sexual assault or stalking, if the applicant otherwise qualifies for admission or assistance and if the applicant household does not include a perpetrator of a previous incident or incidents of domestic violence, dating violence, sexual assault or stalking. Pursuant to VAWA, the PHA must and shall deny admission or assistance to any member of the applicant household who is a perpetrator of domestic violence, dating violence, sexual assault or stalking.

In adopting local standards, supportive of or in addition to the mandated reasons for denial of admission, the PHA shall deny admission or assistance to the individual in the applicant family whose screening process provides relevant information reflecting a history of crimes involving domestic violence, dating violence, sexual assault or stalking or other crimes of physical violence, to persons or property.

III. Confidentiality

The PHA staff shall retain in strictest confidence all information pursuant to VAWA including the fact that an individual is a victim of domestic violence, dating violence, sexual assault or stalking. The VAWA data shall neither be entered into any shared database nor be provided to any related entity, except:

- To the extent that disclosure is requested or consented in writing by the individual who is the victim; or
- Required for use in an eviction proceeding of an abuser, stalker, or perpetrator of domestic violence, dating violence, sexual assault or stalking; or
- Is otherwise required by applicable law

IV. Certification of Claim of Domestic Violence, Dating Violence, Sexual Assault or Stalking

The individual claiming to be a victim of domestic violence, dating violence, sexual assault or stalking, who faces proposed adverse action such as denial of application to tenancy or assistance or termination of tenancy/eviction or assistance, shall provide the complete and accurate certifications to the PHA, owner, landlord or manager within 14 business days after the PHA, owner, landlord or manager requests such certification. If the individual does not provide such certification within the 14 business days after requested by the PHA, owner, landlord or manager, it shall result in loss of the VAWA protection referenced in this policy against a proposed adverse action.

Certification of a claimed incident or incidents of actual or threatened domestic violence, dating violence, sexual assault or stalking may be provided by one of the following accepted forms of verification:

- Form HUD-50066 Certification of Domestic Violence, Dating Violence, Sexual Assault or Stalking. The incident or incidents in question must be described in reasonable detail as required in the form.
- Police or court record describing the incident or incidents in question
- Documentation of incident or incidents in question provided by a social service agency, or court of competent jurisdiction, or a clergyman, physician and/or a public or private facility that provides shelter or counseling to the victims of domestic violence.

The documentation must verify that the family has been displaced as a result of fleeing violence in the home in which they are currently living.

The PHA reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the individual will suffice.

In all cases, the individual claiming to be a victim will have to divulge the name of the perpetrator and the victim will be required to certify that the perpetrator will not be allowed to return to the victim's residency.

PHA retains all rights to add the name of the perpetrator to its "NO TRESPASS" list that is provided to the local police department.

V. Termination of Tenancy or Assistance

The PHA shall terminate tenancy or assistance, or refuse to renew a lease or assistance to any household member who is a perpetrator of domestic violence, dating violence, sexual assault or stalking. The PHA retains the discretion to determine on a case-by-case basis whether or not the entire household or only the offending member(s) shall be evicted or assistance terminated for such criminal activity.

An incident or incidents of actual or threatened domestic violence, dating violence, sexual assault or stalking will not be construed as a serious or repeated violation of the lease or family obligations by the victim or threatened victim of that violence and shall not be good cause for terminating the tenancy or assistance, or occupancy rights of the victim of such violence. Criminal activity directly relating to domestic violence, dating violence, sexual assault or stalking engaged in by a member of a tenant/participant household or any guest or other person under the tenant's control shall not be cause for termination of tenancy or assistance, or occupancy rights if the tenant/participant or an immediate member of the tenant's/participant's family is the victim or threatened victim of that violence. This does not limit the authority of the PHA to:

- Terminate tenancy or assistance to individuals who engage in criminal acts of physical violence against family members or others.
- Terminate tenancy or assistance to a tenant/participant for any violation of the lease or family obligation not premised on the act or acts of violence in question against the tenant or participant or a member of the tenant's/participant's household, provided that the PHA does not subject an individual who is or has been a victim of domestic violence, dating violence, sexual assault or stalking to a more demanding standard than other tenants or participants in determining whether to terminate tenancy or assistance.
- Terminate tenancy or assistance to a tenant/participant if the agency can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property or PHA if that tenant/participant is not evicted or terminated from assistance.

Upon relocation of the household member who is the victim of domestic violence, dating violence, sexual assault or stalking, the PHA shall terminate tenancy or assistance of the remaining family if the perpetrator of the violence remains in the household.

VI. Removal of Perpetrator

Notwithstanding anything in Federal, State, or local law to the contrary, the PHA as public housing landlord; or a Section 8 owner, landlord, or manager, as the case may be, may bifurcate a lease, or remove a household member from a lease, without regard to whether a household member is a signatory to the lease, in order to evict, remove, terminate occupancy rights, or terminate assistance to any individual who is a tenant or lawful occupant and who engages in acts of physical violence against family members or others. Such eviction, removal, termination of occupancy rights, or termination of assistance shall be effected in accordance with the procedures prescribed by law applicable to terminations of tenancy and evictions by PHA. The PHA lease used for all public housing operated by PHA shall contain provisions setting forth the substance in this paragraph. At the option of Section 8 owners or managers, leases for dwelling units occupied by PHA assisted families with the Section 8 HCV program administered by the PHA, shall contain provision setting forth the substance of said paragraph.

Such action against the perpetrator of such physical violence may be taken without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is also the tenant or a lawful occupant.

VII. Court Orders/Family Break-up

Court Orders: It is the policy of the PHA to honor orders entered by courts of competent jurisdiction affecting individuals assisted by PHA and their property, be it in the public housing program or the Section 8 HCV programs. This includes cooperating with law enforcement authorities to enforce civil protection orders issued for the protection of victims and addressing the distribution of personal property among household members in cases where a family breaks up.

Family Break-up: Other policies regarding family break-up are contained in the PHA public housing Admissions and Continued Occupancy Policy and the Section HCV Administrative Plan.

VIII. PHA Relationships with Service Providers

It is the policy of the PHA to cooperate with organizations and entities, both private and governmental, that provides shelter and/or services to victims of domestic violence.

The PHA shall seek and establish partnerships with private and/or governmental entities that provide shelter and/or services to victims of domestic violence, dating violence, sexual assault or stalking.

If PHA staff becomes aware that an individual assisted by the ASC is a victim of domestic violence, dating violence, sexual assault or stalking, PHA will refer the victim to such providers of shelter or services as appropriate. This policy does not create any legal obligation requiring PHA either to maintain a relationship with any particular provider of shelter or services to victims of domestic violence, or to make a referral in any particular case.

PHA's Annual PHA Plan shall describe providers of shelter or services to victims of domestic violence with which it has referral or cooperative relationships.

IX. Relationship with Other Applicable Laws

Neither the Violence Against Women Act nor this policy adopted by the PHA implementing the provisions of the VAWA shall preempt or supersede any provision of Federal, State or local law that provides greater protection than that provided under VAWA for victims of domestic violence, dating violence, sexual assault or stalking.

X. Amending the PHA Violence Against Women Policy

This policy may be amended from time to time by the PHA as approved by the PHA Board of Commissioners.

DEFINITIONS

The following definitions apply to the Housing Authority of the City of Pueblo's Violence Against Women Policy.

1937 Act

1937 Act means the United States Housing Act of 1937 (42 U.S.C. 1437 *et seq.*)

Bifurcate

With respect to a public housing or a Section 8 lease, *bifurcate* means to divide a lease as a matter of law such that certain tenants can be evicted or removed while the remaining family members' lease and occupancy rights are allowed to remain intact.

Dating Violence

Dating Violence means violence committed by a person:

- (1) Who is or has been in a social relationship of a romantic or intimate nature with the victim, and
- (2) Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - (i) The length of the relationship;
 - (ii) The type of relationship; and
 - (iii) The frequency of interaction between the persons involved in the relationship.

Domestic Violence

Domestic Violence includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Household

Household means the family and PHA-approved live-in aide. **The term household also includes foster children and/or foster adults that have been approved to reside in the unit.**

HUD

HUD means the Department of Housing and Urban Development

Immediate Family Member

Immediate Family Member means, with respect to a person:

- (1) A spouse, parent, brother or sister, or child of that person, or an individual to whom that person stands in loco parentis (in place of a parent); or
- (2) Any other person living in the household of that person and related to that person by blood or marriage.

Other person under the tenant's control

Other person under the tenant's control, for the purposes of this policy means that the person, although not staying as a guest (as defined in this section) in the unit, is, or was at the time of the activity in question, on the premises (as *premises* is defined in this section) because of an invitation from the tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant. Absent evidence to the contrary, a person temporarily and infrequently on the premises solely for legitimate commercial purposes is not *under the tenant's control*.

PHA

Public Housing Agency (PHA) means any State, county, municipality, or other governmental entity or public body, or agency or instrumentality of these entities that is authorized to engage or assist in the development or operation of low-income housing under the 1937 Act.

Perpetrator

Perpetrator means a person who commits an act of domestic violence, dating violence, sexual assault or stalking against a victim.

Premises

Premises mean the building or complex or development in which the public or assisted housing dwelling unit is located, including common areas and grounds.

Responsible Entity

For the public housing program, and the Section 8 HCV (tenant-based assistance program) *responsible entity* means the PHA administering the program under an Annual Contributions Contract with HUD.

Stalking

Stalking means:

- (1)(i) To follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate another person; or

(ii) To place under surveillance with the intent to kill, injure, harass, or intimidate another person; and

(2) In the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to

(i) That person,

(ii) A member of the immediate family of that person, or

(iii) The spouse or intimate partner of that person.

VAWA

VAWA means the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109–162, approved August 28, 2006), as amended by the U.S. Housing Act of 1937 (42 U.S.C. 1437d and 42 U.S. 1437f).

Y:\2015\Authority Plans and Policies\Consortium Partners\Pueblo, CO\Authority Policies\Current Policies\VAWA Policy\Pueblo, CO - Final VAWA Policy - 8.6.15.doc

Attachment: co002e01
Housing Authority of the City of Pueblo
Certifications for FYB 2020 Five-Year and Annual PHA Plan

**Form HUD-50077-ST-HCV-HP: PHA Certifications of Compliance with
PHA Plans and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs) including Civil
Rights Certifications**

**Certifications of Compliance with
PHA Plans 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 02/29/2016

**PHA Certifications of Compliance with the PHA Plan and Related Regulations including
Required Civil Rights Certifications
RESOLUTION #2282**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the X 5-Year and/or X Annual PHA Plan for the PHA fiscal year beginning 01/01/2020, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. 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.
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 to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
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 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.
5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes 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 2010-25);
 - 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;
 - 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 part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. 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.
10. 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.
11. 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.

12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. 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.
14. 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.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. 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.
17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. 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.
19. 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.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Housing Authority of the City of Pueblo, Colorado
PHA Name

CO002
PHA Number/HA Code

X Annual PHA Plan for Fiscal Year 2020

X 5-Year PHA Plan for Fiscal Years 2020 - 2024

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Authorized Official

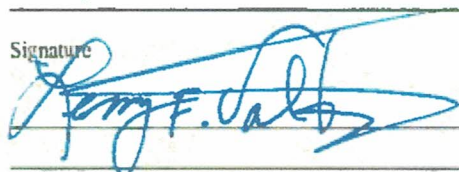
Title

Lenny Valdez

Chairman, Board of Commissioners

Signature

Date



10/17/2019