

PHA Plans for the Housing Authority of the City of Pueblo Annual Plan for FYB 2021

Frank Pacheco, Interim Executive Director

FYB January 1, 2021

FINAL DRAFT



Presented by:

The **Nelrod** Company

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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
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low-income, very low-income, and extremely low-income families.

Applicability. Form HUD-50075-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.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a higher performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** – A PHA that is not designated as PHAS or SEMAP troubled, or 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></p> <p>PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/2021</u></p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning above)</p> <p>Number of Public Housing (PH) Units: <u>818</u></p> <p>Number of Housing Choice Voucher (HCVs): <u>1522</u></p> <p>Total Combined Units/Vouchers: <u>2340</u></p> <p>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 2021 Annual PHA Plan:</p> <p style="margin-left: 40px;">Housing Authority of the City of Pueblo Leasing Department 1414 N. Santa Fe Avenue, 10th Floor Pueblo, CO 81003</p> <p style="margin-left: 40px;">Housing Authority of the City of Pueblo Central Management/Administrative Office 201 S. Victoria Avenue Pueblo, CO 81003</p> <p style="margin-left: 40px;">Housing Authority of the City of Pueblo AMP 100/200 Management Office 2601 Crawford Street Pueblo, CO 81004</p> <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" style="width: 20%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 20%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Programs Not in the Consortia</th> <th colspan="2" style="width: 30%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 15%;">PH</th> <th style="width: 15%;">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 type="checkbox"/></td> <td><input checked="" 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 type="checkbox"/></td> <td><input checked="" 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 type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Substantial Deviation.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" 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><i>Total: 742 – Annual Turnover of 137</i> <i>Extremely Low Income: 674-91%</i> <i>Very Low Income: 60-8%</i> <i>Low Income: 8-1%</i> <i>Families with children: 580-78%</i> <i>Elderly Families: 119-16%</i> <i>Families with Disabilities: 127-17%</i> <i>White: 215-29%</i> <i>Black/African American: 16-2%</i> <i>American Indian/Alaska Native: 1-0.13%</i> <i>Asian: 2-0.27%</i> <i>Native Hawaiian/Other Pacific Islander: 1-0.13%</i> <i>Hispanic: 507-58%</i></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 type="checkbox"/>	<input checked="" type="checkbox"/>	Rent Determination.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Operation and Management.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Grievance Procedures.	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	Substantial Deviation.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Significant Amendment/Modification
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B.1

Bedrooms:

1 BR: 176-24%

2 BR: 372-50%

3 BR: 157-21%

4 BR: 33-4%

5 BR: 4-0.54%

The waiting has been closed for the 1 BR for 18 months and for the 2 BR for 8 months. The PHA does expect to reopen the waiting list in the PHA Plan year.

Waiting List for Section 8:

Total: 473 – Annual Turnover of 137

Extremely Low Income: 442-93%

Very Low Income: 31-7%

Families with children: 396-84%

Elderly Families: 77-16%

Families with Disabilities: 131-28%

White: 73-15%

Black/African American: 8-2%

Asian: 1-0.21%

Hispanic: 391-83%

The waiting list has been closed for 12 months. The PHA does expect to reopen the waiting list in the PHA Plan year.

Strategies for Addressing Housing Needs:

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

PHA shall target available assistance to families at or below 30% of AMI by:

- ***Homeless admission preference aimed at families actively experiencing homelessness***

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

PHA shall target available assistance to families at or below 50% of AMI by:

- ***Advertising availability at local community agencies***

PHA added the above and deleted “Employee admissions preference aimed at families who are working.

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:

Priority Preference

- | | |
|------------|---|
| <u>110</u> | - Victims of domestic violence |
| <u>110</u> | - Displacement due to federally declared disaster |
| <u>105</u> | - <i>Applicant families who are actively experiencing homelessness. This preference will be limited to no more than 33% of unit offers per month.</i> |
| <u>100</u> | - <i>Single persons who are elderly, displaced, homeless or persons with disabilities over other single persons</i> |
| <u>100</u> | - Families that include a person with disabilities, but not for persons with a specific disability |

PHA added:

- *Applicant families who are actively experiencing homelessness. This preference will be limited to no more than 33% of unit offers per month.*
- *Single persons who are elderly, displaced, homeless or persons with disabilities over other single persons*

PHA deleted:

- *Working families and those unable to work because of age or disability*

Maintaining Waiting List:

The Housing Authority of the City of Pueblo maintains a community-wide waiting list. Interested persons may apply for admission to public housing at the main administrative office located at 1414 N. Santa Fe, Pueblo, CO 81003.

The Housing Authority of the City of Pueblo does not plan to operate any site-based waiting lists. The Public Housing, one-bedroom waiting list was closed as of *May 20, 2019*. It is anticipated that this list *may reopen during HACP's fiscal year 2021. The Public Housing two-bedroom waiting list closed as of March 1, 2020. It is anticipated that this may reopen during HACP's fiscal year 2021.*

B.1 Deconcentration and Income Mixing:

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

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

The following covered developments have average incomes that fall above or below the Established Income Range.

Deconcentration Policy for Covered Developments			
Development Name:	Number of Units	Explanation (if any) [see step 4 at §903.2(c)(1)(iv)]	Deconcentration policy (if no explanation) [see step 5 at §903.2(c)(1)(v)]
<i>Sangre de Cristo-CO2-01</i>	<i>140</i>	<i>A. Provide 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 add amenities; and D. Skip a family on the waiting list to reach another family in an effort to further the goals of the PHA's de-concentration policy.</i>	
<i>Scattered Site-CO02-04</i>	<i>78</i>	<i>C. The Covered Development's size, location, and/or configuration promote income de-concentration, such as scattered site or small developments</i>	
<i>Scattered Site-CO02-09</i>	<i>20</i>	<i>C. The Covered Development's size, location, and/or configuration promote income de-concentration, such as scattered site or small developments</i>	
<i>Scattered Site-CO02-14</i>	<i>40</i>	<i>C. The Covered Development's size, location, and/or configuration promote income de-concentration, such as scattered site or small developments</i>	

B.1	Scattered Site-CO02-15	12	C. The Covered Development's size, location, and/or configuration promote income de-concentration, such as scattered site or small developments
	Scattered Site-CO02-18	20	C. The Covered Development's size, location, and/or configuration promote income de-concentration, such as scattered site or small developments
	Scattered Site-CO02-20	38	C. The Covered Development's size, location, and/or configuration promote income de-concentration, such as scattered site or small developments
	Scattered Site-CO02-22	6	C. The Covered Development's size, location, and/or configuration promote income de-concentration, such as scattered site or small developments

Section 8

Waiting List Organization:

The Housing Authority of the City of Pueblo's waiting list for the Section 8 tenant-based assistance is not merged with any other program waiting list.

Interested persons may apply for participation in the PHA's Section 8 tenant-based assistance at the office located at 1414 N. Santa Fe, Pueblo, CO 81003.

The Section 8 waiting list is currently closed. The Housing Authority will reopen the waiting list as needed during *FY 2021*.

PHA deleted: The HACP is in the process of transitioning from a wait list to a lottery system, which will involve exhausting the current wait list.

Preferences:

The PHA plans to employ the following admission preferences for admission to Section 8 tenant-based assistance:

Priority Preference

- 110 - Victims of domestic violence
- 110 - Involuntary Displacement (Federally declared disaster)
- 110 - Transfers from Project-Based Voucher Section 8 units

B.1 100 - *Working families and those unable to work because of disability*

PHA added – Working families and those unable to work because of disability and the PHA deleted – Disabled Person(s)/Elderly

Financial Resources

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2021 grants)		
a) Public Housing Operating Fund	3,819,010.00	
b) Public Housing Capital Fund	1,905,000.00	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	9,608,886.00	
f) Resident Opportunity and Self-Sufficiency Grants		
g) Community Development Block Grant		
h) HOME		
Other Federal Grants (list below)		
Section 8 New Construction (MPT)	545,342.00	Operating Expenses
Farm Worker Housing (USDA)	51,889.00	Operating Expenses
Section 8 Moderate Rehabilitation	963,801.00	Operating Expenses & HAP's
2. Prior Year Federal Grants (unobligated funds only) (list below)		
CO06P002501-19	840,313.00	Public housing capital improvements
CO06P002501-20	1,315,465.00	Public housing capital improvements
3. Public Housing Dwelling Rental Income		
4. Other income (list below)		
Non-Dwelling Rent	30,194.00	Public housing operations
Interest on Investments	361.00	Public housing operations
Other Income: Legal Fees, Maintenance charges to Tenants	56,658.00	Public housing operations
Late Fees, NSF Charges, etc.	13,650.00	Public housing operations
Non-Dwelling Rent	12,000.00	Public housing operations
Laundry Commission, Vending Machines, etc.	14,789.00	Public housing operations
5. Non-federal sources (list below)		
COCC Fee	341,746.00	Administration
Section 8 New Const. (MPT) Dwelling Rents	454,635.00	Operating Expenses
Farm Labor Dwelling Rents	52,069.00	Operating Expenses
Admin Fees	61,562.00	Operating Expenses
Interest Income on Mortgages	89,117.00	Operating Expenses
Interest Income and Other Income FLP, COCC	630.00	Operating Expenses
Total resources	\$22,590,477.00	

B.1 Operation and Management

PHA Management Structure:

A brief description of the management structure and organization of the PHA. (*See attachment c0002d01*)

HUD Programs under PHA Management:

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	835	<i>137</i>
Section 8 Vouchers	1470	<i>265</i>
Section 8 Certificates	N/A	N/A
Section 8 Mod Rehab	124	<i>37</i>
Special Purpose Section 8 Certificates/Vouchers (list individually)	VASH Vouchers - <i>61</i>	<i>30</i>
Other Federal Programs (list individually)		
Section 202	96	<i>18</i>
Section 8 New Construction	132	<i>201</i>
Low-Income Housing Tax Credit	303	<i>20</i>
U.S.D.A Rural Development	18	<i>1</i>

Management and Maintenance Policies:

Public Housing

PHA added the following policies:

- *Contagious and Infectious Disease Preparedness and Recovery Plan*
- *Data Breach Policy*

Community Service and Self-Sufficiency Programs

Family Self-Sufficiency:

Family Self Sufficiency (FSS) Participation		
Program	Required Number of Participants	Actual Number of Participants (As of: <u>(10/21/2020)</u>)
Public Housing	5	<i>29</i>
Section 8	0	<i>18</i>

<p>B.1</p>	<p><u>Community Service Implementation Report:</u></p> <ul style="list-style-type: none"> ▪ Number of tenants required to perform community service: <u> 0 </u> ▪ Number of tenants performing community service: <u> 0 </u> ▪ Number of tenants granted exemptions: <u> 0 </u> ▪ Number of tenants in non-compliance: <u> 0 </u> ▪ Number of tenants terminated/evicted due to non-compliance: <u> 0 </u> <p>c) The PHA must submit its Deconcentration Policy of Field Office review. (<i>See attachment co002b01</i>)</p>
<p>B.2</p>	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Project-Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA</p> <p>Demolition and/or Disposition</p> <p>The PHA plans to conduct demolition or disposition activities in the plan Fiscal Year, depending on the availability of funding.</p>

B.2 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>

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

B.2

Demolition/Disposition Activity Description	
1a. Development name:	AMP 300 Scattered Site – 508 W. 14 th 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

Demolition/Disposition Activity Description	
1a. Development name:	<i>Scattered Site Public Housing</i>
1b. Development (project) number:	CO0020000300
2. Activity type:	<i>Demolition</i> <input checked="" type="checkbox"/> Disposition <input type="checkbox"/>
3. Application status (select one)	Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> <i>Planned application</i> <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission:	<i>January 2021</i>
5. Number of units affected:	<i>158</i>
6. Coverage of action (select one)	<input checked="" type="checkbox"/> <i>Part of the development</i> <input type="checkbox"/> Total development
7. Timeline for activity:	a. Actual or projected start date of activity: <i>January 1, 2021</i> b. Projected end date of activity: <i>July 1, 2021</i>

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 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

<p>B.2</p>	<p>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 Fund 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 (<i>See attachmentco002c01</i>)</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.</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:</p> <p><i>Preparation of Financial Statements and Schedule of Expenditures of Federal Awards (SEFA) and Material Adjusting Journal Entries</i></p> <p><u><i>Material Weakness in Internal Control over Financial Reporting</i></u></p> <p><i>Criteria – A good system of internal control contemplates an adequate system for recording and processing adjusting journal entries that are significant or material to the financial statements and SEFA in order to prepare accurate and complete financial statements for the Authority.</i></p>

B.4

Condition – As part of the audit, we proposed material audit adjustments to the financial statements and SEFA that were not detected by management, resulting in incorrect financial statements for the Authority in the interim. The auditors were requested to prepare the financial statements, and did, draft the financial statements and accompanying notes to the financial statements.

Effect – The control deficiency could result in a misstatement to the financial statements and SEFA that would not be prevented or detected and disclosures to the financial statements could be incomplete or incorrect.

Cause – Due to oversight by management, not all adjustments or transactions were recorded to the financial statements and reflected in the SEFA. Additionally, the Authority’s control process did not allow for the preparation of the financial statements and accompanying notes.

Recommendation – We recommend that all necessary adjustments and transactions are recorded by management prior to our audit and the financial statements are prepared, including all notes.

Views of Responsible Officials – Management agrees with the finding.

U.S. Department of Housing and Urban Development - CFDA #14.182/14.856 Section 8 Moderate Rehabilitation and New Construction Applicable Federal Award Number and Year – Section 8 Moderate Rehabilitation and New Construction - 2018

Eligibility

Significant Deficiency in Internal Control over Compliance

Criteria – The Program requires the Authority to determine eligibility of participants of the program through annual and interim review of participant information.

Condition – During our testing of tenant files, we identified 4 instances in which the tenant’s income was not re-verified and an additional 3 instances with missing or uncompleted checklists.

Questioned Costs – None Reported.

Context/Sampling – A non-statistical sample of 60 participants were selected for testing. 4 out of the 60 tenant files had incorrect rent calculations and 3 out of the 60 tenant files were missing or had uncompleted checklists.

Effect – Failure to implement a proper control process could result in incorrect calculations of income which could cause errors in eligibility determinations.

B.4

Cause – Due to a lack of oversight by file managers, appropriate checklists were not completed and retained in participant files.

Repeat Finding from Prior Year - No.

Recommendation – The Authority should ensure that all checklists are being appropriately completed and retained to document eligibility determinations.

Views of Responsible Officials – Management agrees with the finding.

U.S. Department of Housing and Urban Development - CFDA #14.850 Indian and Public Housing Applicable Federal Award Number and Year – Indian and Public Housing - 2018 Special Tests and Provisions: Project-Based Budgeting and Accounting

Significant Deficiency in Internal Control over Compliance

Criteria – The Program requires that costs be properly allocated within projects in the program.

Condition – During our testing, one expenditure was identified as being charged to and paid by the incorrect AMP.

Questioned Costs – None Reported.

Context/Sampling – A non-statistical sample of 60 expenditures were selected for testing. 1 out of the 60 expenditures were incorrectly coded to the wrong AMP.

Effect – Failure to implement a proper control process could result in unallowed costs being paid by projects within the program.

Cause – Due to oversight by management, an expenditure was incorrectly coded to the wrong AMP.

Repeat Finding from Prior Year – No.

Recommendation – The Authority should ensure that all invoices are coded to the appropriate AMP and reviewed by appropriate staff.

Views of Responsible Officials – Management agrees with the finding.

B.5

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.

PHA GOAL #1: EXPAND THE SUPPLY OF ASSISTED HOUSING

The PHA established the following objectives to strive in meeting goal #1:

- Reduce public housing vacancies
- Leverage private or other public funds to create additional housing opportunities
- Acquire or build units or developments

Progress Statement: *The Housing Authority of the City of Pueblo has successfully leveraged private and other public funds to begin construction on the 51-unit Mountain View Townhomes. The Mountain View Townhomes are the second 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. The Housing Authority of the City of Pueblo also intends to apply for 9% Low Income Housing Tax Credits in February 2021 to fund the third phase of construction. Additionally, there has been a strong effort to both reduce public housing vacancies and reduce the amount of time a unit is vacant.*

PHA GOAL #2: IMPROVE THE QUALITY OF ASSISTED HOUSING

The PHA established the following objectives to strive in meeting goal #2:

- Improve public housing management (PHAS score)
- Improve voucher management (SEMAP score)
- Increase customer satisfaction
- Renovate or modernize public housing units
- Demolish or dispose of obsolete public housing
- Use the Rental Assistance Demonstration program to replace the Sangre de Cristo Apartments and other public housing developments
- Convert public housing to Section 8 housing

Progress Statement: *The Housing Authority of the City of Pueblo is implementing an online tenant and landlord portal. This will allow residents to the ability 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.*

PHA GOAL #3: INCREASE ASSISTED HOUSING CHOICES

The PHA established the following objectives to strive in meeting goal #3

- Conduct outreach efforts to potential voucher landlords
- Increase voucher payment standards

B.5

- Implement voucher homeownership program
- Convert public housing to vouchers
- Increase use of Section 504 accessible units by creating a separate wait list for ADA-Accessible units

Progress Statement: *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.*

PHA GOAL #4: PROVIDE AN IMPROVED LIVING ENVIRONMENT

The PHA established the following objectives to strive in meeting goal #4

- Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments
- Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments
- Implement public housing security improvements

Progress Statement: *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.*

PHA GOAL #5: PROMOTE SELF-SUFFICIENCY AND ASSET DEVELOPMENT OF ASSISTED HOUSEHOLDS

The PHA established the following objectives to strive in meeting goal #5

- Increase the number and percentage of employed persons in assisted families
- Provide or attract supportive services to improve assistance recipients' employability

Progress Statement: *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. Additionally, the Family Self-Sufficiency program coordinator pairs residents in need with community resources. The Housing Authority of the City of Pueblo has also utilities social media to engage with residents, advertise employment opportunities, and educate residents about Section 3 opportunities.*

PHA GOAL #6: ENSURE EQUAL OPPORTUNITY AND AFFIRMATIVELY FURTHER FAIR HOUSING

The PHA established the following objectives to strive in meeting goal #6

- Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability

B.5	<ul style="list-style-type: none"> ▪ Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required <p><u>Progress Statement:</u> <i>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.</i></p>
B.6	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. (<i>See attachment co002a01</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.</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 <input type="checkbox"/> <input checked="" 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><i>See HUD Form 50075.2 approved by HUD on <u>10/18/2019</u></i></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 2021

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 meeting **November 2, 2020, November 17, 2020 and December 1, 2020 (Per phone)**
4. Notification of Public Hearing

Schedule date for Public Hearing and place ad **November 1, 2020**

Notify Resident Advisory Board

Hold Public Hearing meeting **December 15, 2020**
5. Documentation of resident recommendations and PHA’s response to recommendations

HOUSING AUTHORITY OF THE CITY OF PUEBLO SIGN IN SHEET

Type of Meeting:

- Planning Meeting
- Public Hearing
- Training
- Resident Meeting
- Other _____

Date: 11/2/2020 Time: _____

Event/Session Title: FY 2021 Annual Plan

Total # People Attending: 10

Please Sign Below:

1. Frank Pacheo HAEP	26.
2. Joe Mahoney HAEP	27.
3. Cody Kuhlman HAEP	28.
4. Don Christensen HAEP	29.
5. Paul Polk HAEP	30.
6. Stacy Vincent C.D.S.	31.
7. Pat Rivas HAEP	32.
8. Sarah Habib HAEP	33.
9. Matthew Golden ^{2104 Ogden #1}	34.
10. Elizabeth McMannus ^{1400 Ogden #4091}	35.
11.	36.
12.	37.
13.	38.
14.	39.
15.	40.
16.	41.
17.	42.
18.	43.
19.	44.
20.	45.
21.	46.
22.	47.
23.	48.
24.	49.
25.	50.

(Use additional sheets, if necessary)

Summary of comments follows:

One comment from RAB-Elizabeth McMannus asked if residents affected by Section 18 conversion would see rent increase. Explained rent cap and that most would NOT see increase.

The resident meeting was adjourned by the Meeting Officer after residents had fully discussed issues and concerns. The Housing Authority made every effort to incorporate resident concerns into the Annual Plan.

Signature, Resident Leader or Resident Committee Chairperson

Date

HOUSING AUTHORITY OF THE CITY OF PUEBLO SIGN IN SHEET

Type of Meeting:

- Planning Meeting
- Public Hearing
- Training
- Resident Meeting
- Other _____

Date: 11/17/2020 Time: 1:00 pm
 Event/Session Title: FY 2021 Annual Plan

Total # People Attending: 6

Please Sign Below:

1. <u>Cody Kuhlman HACP</u>	26.
2. <u>Paul Rivas HACP</u>	27.
3. <u>Sarah Habib HACP</u>	28.
4. <u>Elizabeth McManus</u> ^{Moo Deman} #409	29.
5. <u>Matthew Golden</u> ^{#2104 Golden} #24	30.
6. <u>Catherine Allen</u> ²⁴¹⁵ Sprague	31.
7.	32.
8.	33.
9.	34.
10.	35.
11.	36.
12.	37.
13.	38.
14.	39.
15.	40.
16.	41.
17.	42.
18.	43.
19.	44.
20.	45.
21.	46.
22.	47.
23.	48.
24.	49.
25.	50.

(Use additional sheets, if necessary)

Summary of comments follows:

Catherine Allen asked if changes to preferences will affect Domestic Violence Preference. Explained Domestic Violence Preference as well as Family Disability Preference will not be removed, but Employment Preference will be removed.

The resident meeting was adjourned by the Meeting Officer after residents had fully discussed issues and concerns. The Housing Authority made every effort to incorporate resident concerns into the Annual Plan.

Signature, Resident Leader or Resident Committee Chairperson

Date

HOUSING AUTHORITY OF THE CITY OF PUEBLO SIGN IN SHEET

Type of Meeting:

- Planning Meeting
- Public Hearing
- Training
- Resident Meeting
- Other _____

Date: 12/1/2020 Time: 1:00 pm
 Event/Session Title: FY 2021 Annual Plan

Total # People Attending: 4

Please Sign Below:

1.	Sarah Habib HAEP	26.
2.	Cody Kuhlman HAEP	27.
3.	Jaurie Polk HAEP	28.
4.	Eric Moore HAEP	29.
5.		30.
6.		31.
7.		32.
8.		33.
9.		34.
10.		35.
11.		36.
12.		37.
13.		38.
14.		39.
15.		40.
16.		41.
17.		42.
18.		43.
19.		44.
20.		45.
21.		46.
22.		47.
23.		48.
24.		49.
25.		50.

(Use additional sheets, if necessary)

Summary of comments follows:

NO Residents in attendance, adjourned
1:05 pm

The resident meeting was adjourned by the Meeting Officer after residents had fully discussed issues and concerns. The Housing Authority made every effort to incorporate resident concerns into the Annual Plan.

Signature, Resident Leader or Resident Committee Chairperson

Date

Responses:

1. Jean Tucker
2. Timothy Heard
3. Princessa Whitehead
4. Victoria Marquez
5. Linda Bryant
6. Matthew Golden
7. William Sprous
8. Eddie Johnson
9. James Klodzinski
10. Teodolo Gonzales
11. Elizabeth Mc Mannus
12. Catherine Allen
13. Levi Whatley
14. Joelle Moschella
15. Angelic Lucero

11/2/2020 1:00 p.m.

Staff in attendance:

Frank Pacheco
Joe Mahoney
Cody Kuhlman
Don Christensen
Laurie Polk
Stacy Vincent
Pat Rivas
Sarah Habib

Residents in attendance:

Matthew Golden
Elizabeth McMannus

1:05 called to order

- Addressed Purpose of RAD purpose of Annual Plan proposed changes
- Explained significant amendment to 2020 Annual Plan:
 - Plan to dispose of 362 scattered-site Public Housing Units and convert to Section 8 Project-Based Vouchers
 - Explained potential for increased revenue

- Stacy Vincent added that HUD is encouraging PHAs to convert to Section 8 assistance because it allows PHAs to better afford ongoing management costs.
- Elizabeth McMannus asked if the residents affected by Section 18 conversion will see a rent increase.
 - Explained that the rent calculation is the same, but some income disallowances do not apply to Section 8. For this reason, virtually all residents rent will not change.
- Asked residents for any additional questions or comments.
 - None
- Asked staff for any additions or comments
 - None
- Reminded all in attendance that drafts are available on our website and comments can be sent to me directly.

1:20 Adjourn

11/17/2020 1:00 p.m.

Staff in Attendance:

Cody Kuhlman

Pat Rivas

Sarah Habib

Residents in attendance:

Elizabeth McMannus

Matthew Golden

Catherine Allen

1:05 p.m. called to order

- Addressed Purpose of RAD purpose of Annual Plan proposed changes
- Explained significant amendment to 2020 Annual Plan:
 - Plan to dispose of 362 scattered-site Public Housing Units and convert to Section 8 Project-Based Vouchers
 - Explained potential for increased revenue
 - Detailed limited impact to affected residents
- Explained continued plans for RAD conversion at Sangre de Cristo
 - Explained second phase is under construction and should be leasing Spring/Summer 2021
 - Explained plans to submit phase III LIHTC application early 2021
- Explained changes proposed in 2021 Annual Plan

- Adoption of Homeless preference
- Removal of Employment preference
- Explained Capital Funds plans
 - \$850,000 to demolition at Sangre de Cristo
 - Windows at Mesa Tower
 - Keyless entries at high rises
 - Concrete work at scattered sites
 - Exterior paint at scattered sites
- Explained changes to ACOP and Admin Plans
 - Preferences
 - HUD-mandated changes
 - Updates to inspections
 - Alternative inspection types
 - Remote video inspections
- Catherine Allen asked about homeless preference
 - Explained due to COVID, implementation deadlines have been delayed. Will take effect 4/1/2020 when 2021 Annual Plan is approved
 - Explained that existing preferences such as Domestic Violence and Disabled/Elderly will not be removed.
- Opened the floor for additional questions and comments
 - No further questions or comments
- Reminded all in attendance that drafts are available on our website.
- Reminded all in attendance that comments and questions can be sent to me directly.

1:15 p.m. Adjourn

12/1/2020

Staff in Attendance:

Cody Kuhlman
 Laurie Polk
 Eric Moore
 Sarah Habib

Residents in Attendance:

None

Meeting adjourned 1:05 p.m. – no residents in attendance

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**

<p>Adopted by Board of Commissioners</p> <p>Resolution No.: _____</p> <p>Date of Adoption: _____</p>

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
Rental Assistance Demonstration (RAD)
Amendment

Rental Assistance Demonstration (RAD) Amendment to the 2020 Annual Plan

Significant Amendment to HACP's FY2020 Annual Plan

The Housing Authority of the City of Pueblo (HACP) is amending its Annual Plan to allow for implementation of the following U.S. Department of Housing and Urban Development (HUD) programs:

- 1. Section 18 disposition or RAD conversion of HACP's scattered site units.***
- 2. RAD conversion of Sangre de Cristo and HACP's other public housing developments.***

Rental Assistance Demonstration Program and Section 18 Blending

Section 18 Demolition/Disposition

Over the next several years, HACP is considering the possible conversion of its public housing units through the Rental Assistance Demonstration (RAD)/Section 18 Blend and Section 18 Demolition and/or Disposition. As encouraged by HUD, HACP is conducting an asset repositioning analysis to ensure the agency is best serving the residents and the community. HACP will be coordinating and obtaining the input of various stakeholders throughout the asset repositioning analysis, this process is expected to take 12 to 18 months. As an outcome of this analysis, HACP will develop an implementation strategy that best optimizes the use of HUD's repositioning tools. In addition, this asset repositioning analysis is examining public and private partnerships that will preserve and stabilize affordable housing in Pueblo over the long term.

On October 22, 2013, HACP had submitted a RAD Application for all 211 public housing apartments at the Sangre de Cristo site which is part of AMP 100. The purpose of the award is to begin the process of effectuating the conversion of public housing to a form of project-based assistance under the Section 8 of the Public Housing Act of 1937.

Development	HUD issued CHAP	Conversion Type	Number of units converted/ Planned for Conversion	Status
Sangre de Cristo Phase I	03/19/15	RAD PBRA	72	Apartments complete
Sangre de Cristo Phase II	05/21/18	RAD PBV	47 (4 de minimis)	Construction underway
Sangre de Cristo Phase III	04/17/18	RAD PBRA	49	Due diligence and financial structuring underway/financing applications to be submitted in 2021
Sangre de Cristo Phase IV	TBD		40	Due diligence planned to begin in 2022

RAD is authorized by the Consolidated and Further Continuing Appropriations Act of 2012 (Pub. L. No. 112-55, approved November 18, 2011), as amended by the Consolidated Appropriations Act, 2014 (Pub. L. No. 113-76, approved January 17, 2014), the Consolidated and Further Continuing Appropriations Act, 2015 (Pub. L. No. 113-235, approved December 16, 2014), the Consolidated Appropriations Act, 2016 (Pub. L. No. 114-113, approved December 18, 2015), the Consolidated Appropriations Act, 2017 (Pub. L. No 115-31, approved May 5, 2017), and section 237 of Title II, Division L, Transportation, Housing and Urban Development, and Related Agencies, of the Consolidated Appropriations Act, 2018 (Pub. L. 115-141, approved March 23, 2018) collectively, the "RAD Statute."

HACP is currently analyzing financial repositioning options for these properties. As a result, HACP will be converting a number of its Asset Management units to either Project Based Vouchers or Project Based Rental Assistance (PBRAs) under the guidelines of H-2019-09 PIH 2019-23, Notice PIH 2018-04 and any successor PIH Notices, rules and regulations. Upon conversion, HACP will adopt resident rights, participating, waiting list and grievance procedures as required by HUD. HACP will comply with all fair housing and civil rights requirements. The RAD and Section 18 Blending programs were designed by HUD to assist in addressing the capital needs of public housing by providing housing authorities with access to private sources of capital to repair and preserve its affordable housing assets. Upon conversion, HACP's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted under RAD. HACP will access private funding sources and

borrow funds, in accordance with industry standard underwriting criteria to address the capital needs of affordable housing apartments. HACP may also decide to contribute Operation Reserves available at the time of conversion and Capital Funds towards the conversion and will annually, and periodically submit these financial reports to HUD requesting access to these funds.

Please find below the specific developments for which HACP is assessing the RAD program.

<i>Development</i>	<i>PIC ID</i>	<i>Conversion Type</i>	<i>Transfer of Assistance</i>	<i>0 BR</i>	<i>1 BR</i>	<i>2 BR</i>	<i>3 BR</i>	<i>4 BR</i>	<i>5 BR</i>	<i>TOTAL</i>
<i>Sangre de Cristo Apartments</i>	<i>CO002-01</i>	<i>RAD</i>		<i>0</i>	<i>25</i>	<i>112</i>	<i>53</i>	<i>22</i>	<i>0</i>	<i>212</i>
<i>Scattered Sites</i>	<i>CO002-02</i>	<i>Section 18</i>		<i>0</i>	<i>28</i>	<i>0</i>	<i>22</i>	<i>4</i>	<i>1</i>	<i>55</i>
<i>Mesa Tower Apartments</i>	<i>CO002-03</i>	<i>RAD</i>		<i>0</i>	<i>102</i>	<i>0</i>	<i>1</i>	<i>0</i>	<i>0</i>	<i>103</i>
<i>Greenwood Apartments</i>	<i>CO002-04</i>	<i>RAD</i>		<i>6</i>	<i>4</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>10</i>
<i>Ogden Apartments</i>	<i>CO002-04</i>	<i>RAD</i>		<i>16</i>	<i>9</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>25</i>
<i>Scattered Sites</i>	<i>CO002-04</i>	<i>Section 18</i>		<i>0</i>	<i>4</i>	<i>8</i>	<i>14</i>	<i>12</i>	<i>5</i>	<i>43</i>
<i>Eastwood Heights</i>	<i>CO002-05</i>	<i>Section 18</i>		<i>0</i>	<i>0</i>	<i>10</i>	<i>15</i>	<i>13</i>	<i>6</i>	<i>44</i>
<i>Amarillo Apartments</i>	<i>CO002-05</i>	<i>RAD</i>		<i>10</i>	<i>11</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>21</i>
<i>West 16th Complex</i>	<i>CO002-06</i>	<i>RAD</i>		<i>10</i>	<i>5</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>15</i>
<i>West 12th Complex</i>	<i>CO002-06</i>	<i>RAD</i>		<i>0</i>	<i>6</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>6</i>
<i>Scattered Sites</i>	<i>CO002-06</i>	<i>Section 18</i>		<i>0</i>	<i>0</i>	<i>11</i>	<i>14</i>	<i>5</i>	<i>6</i>	<i>36</i>
<i>Morris Duplexes</i>	<i>CO002-08</i>	<i>RAD</i>		<i>0</i>	<i>0</i>	<i>6</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>6</i>
<i>Scattered Sites</i>	<i>CO002-08</i>	<i>Section 18</i>		<i>0</i>	<i>2</i>	<i>25</i>	<i>14</i>	<i>1</i>	<i>0</i>	<i>42</i>

<i>Scattered Sites</i>	CO002-09	Section 18		0	10	7	3	0	0	20
<i>Anita Complex</i>	CO002-10	RAD		0	0	6	2	0	0	8
<i>Elmhurst Complex</i>	CO002-10	RAD		0	0	6	4	0	0	10
<i>West Street Complex</i>	CO002-10	RAD		0	0	4	1	0	0	5
<i>Scattered Sites</i>	CO002-10	Section 18		0	2	10	5	0	0	17
<i>Vail Hotel Apartments</i>	CO002-11	RAD		1	54	1	6	0	0	62
<i>Minnequa Park Apartments</i>	CO002-14	RAD		0	40	0	0	0	0	40
<i>Scattered Sites</i>	CO002-15	Section 18		0	0	0	12	0	0	12
<i>Montezuma Complex</i>	CO002-17	RAD		0	0	0	20	0	0	20
<i>Scattered Sites</i>	CO002-18	Section 18		0	0	0	20	0	0	20
<i>Scattered Sites</i>	CO002-20	Section 18		0	0	0	38	0	0	38
<i>Scattered Sites</i>	CO002-22	Section 18		0	0	0	6	0	0	6
<i>Scattered Sites</i>	CO002-23	Section 18		0	0	0	3	0	0	3
<i>Scattered Sites</i>	CO002-25	Section 18		0	0	0	11	0	0	11
<i>Scattered Sites</i>	CO002-27	Section 18		0	0	0	10	0	0	10

Section 18 Demolition/Disposition

The following table is a planning tool that HACP uses to inform HUD and other stakeholders of potential considerations for future demolition/disposition activities and replacement of properties in the portfolio. Based on the comprehensive assessment recommendations and findings, HACP will submit Section 18 applications to HUD for the demolition or disposition of units in the agency's public housing portfolio. As any planned demolition or disposition is undertaken, HACP will seek to replace the units in the same communities as long as the neighborhood is below city/county average poverty rates, are potentially in an area of opportunity,

and/or the long term residents of the units are satisfied connected with the neighborhood, or developments that are part of a larger neighborhood revitalization plan. The objective is to provide quality and safe housing that operates efficiently and effectively for our residents. Multiple approaches are being evaluated to continue to deliver quality sustainable housing units and to pursue the perseverance of sustainable affordable housing units that provide choice and opportunity for our residents. To accomplish this objective and after due diligence, concepts such as acquisition/rehabilitation, new construction for replacement units as well as conversion of rental single-family homes to homeownership and review of other funding programs are being considered and implemented. Some of these options are discussed throughout this annual plan. The following table is utilized to reflect Demolition/Disposition activities.

In the fourth quarter of 2020, HACP plans to submit a Section 18 disposition application or multiple Section 18 disposition applications to the HUD Special Application Center (SAC) for the disposition of approximately 362 scattered site units located in AMPs 300 and 400, under the guidelines of PIH Notice 2018-04 (HA) and any other applicable PIH Notices, rules and regulations. Due to distance between units and lack of uniformity of systems (e.g. HVAC, utilities) HACP is demonstrating an unsustainability to operate and/or maintain the units as public housing. Scattered site units are defined by HUD as units in non-contiguous buildings with four or fewer total units.

After obtaining HUD SAC approval to dispose of the scattered sites, HACP will apply to HUD for the same number of tenant protection vouchers, this subsidy will then be project-based for each unit and all tenants that are lease compliant will remain in the units. The conversion is a change in HUD subsidy in order to preserve the long-term affordability of the units, but this conversion is expected to have minimal impact on the existing public housing residents residing in these units.

As required by HUD, HACP plans to transfer the ownership of the units to an HACP related entity. PBV units require a Housing Assistance Payment (HAP) contract that will be administered by HACP with oversight from HUD. This conversion ensures efficiency in operations and thus creating a more stable funding source for these units. It is anticipated that approximately 10 of these units may need to be demolished. A 30-year use agreement will be tied to each unit restricting use of these properties to affordable housing. At some point in the future, HACP may determine a certain number of the units are not sustainable over the long term and the agency may request HUD permission to sell the units at fair market value, after going through a HUD process that includes resident notifications/meetings. HACP is evaluating whether any of the units are physical deteriorated to a point that will

preclude their preservation as affordable housing or are so remotely located making management and maintenance of these units financially infeasible.

HACP expects to phase in this conversion of subsidy from public housing to project based vouchers over a period of approximately 6-9 months and will refine the timelines stated below.

Columns included in table below:

- 1. Identifies the HUD project number associated with the development.**
- 2. Indicates the number of units.**
- 3. The type of action proposed, whether HACP is pursuing demolition or disposition.**
- 4. reflects the status of application each year, such as if it is an application HACP intends to submit (Planned application), or if the application has been submitted and we are either waiting approval (Submitted, pending approval) or it has been approved.**
- 5. Provides an estimated start and end date of when the activity of demolition/disposition may begin after HACP has received HUD approval.**
- 6. Provides a brief description of the steps HACP intends to take as part of the action and the preservation of affordable units.**

362 non-contiguous (1-4 unit) scattered sites Section 18 activities planned

1 AMP	2 Number of Units	3 Type of Action	4 Status	5 Timeline (anticipated disposition)	6 Narrative
300	158	Disposition	Planned	Fourth Quarter 2020-First Quarter 2021	HACP plans to transfer the units to El Centro Pueblo Development Corporation (a single purpose-related entity), apply to HUD for tenant protection vouchers and then project-base the vouchers through a Housing Assistance Payment contract.
400	204	Disposition	Planned	First Quarter 2021-Second Quarter 2021	HACP plans to transfer the units to El Centro Pueblo Development Corporation (a single purpose-related entity), apply to HUD for tenant protection vouchers and then project-base the vouchers

					<i>through a Housing Assistance Payment contract.</i>
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The following tables are utilized to reflect additional Demolition/Disposition activities under consideration as part of HACP's asset repositioning analysis.

Development #1

Name of Public Housing Development: <i>Amarillo Apartments</i>	PIC Development ID: <i>CO00200300</i>	Conversion Type: <i>PBV/PBRA</i>	Transfer of Assistance: <i>N/A</i>
Total Units: <i>21</i>	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development: <i>\$48,564.37 (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</i>
Bedroom Type:	Number of Units, pre-conversion:	Number of Units, post-conversion:	Change in number of units per bedroom type and why:
Efficiency:	<i>11</i>	<i>11</i>	
One Bedroom:	<i>10</i>	<i>10</i>	
Two Bedroom:			
Three Bedroom:			
Four Bedroom:			
Five Bedroom:			
(If performing a transfer of assistance)		Explain how transferring waiting list: Will begin housing from existing PBV waiting list.	

Development #2

Name of Public Housing Development: <i>Morris Duplexes</i>	PIC Development ID: <i>CO00200300</i>	Conversion Type: <i>PBV/PBRA</i>	Transfer of Assistance: <i>N/A</i>
Total Units: <i>6</i>	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development: <i>\$13,875.53 (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</i>
Bedroom Type:	Number of Units, pre-conversion:	Number of Units, post-conversion:	Change in number of units per bedroom type and why:
Efficiency:			
One Bedroom:			
Two Bedroom:	<i>6</i>	<i>6</i>	
Three Bedroom:			
Four Bedroom:			
Five Bedroom:			
(If performing a transfer of assistance)		Explain how transferring waiting list: Will begin housing from existing PBV waiting list.	

Development #3

Name of Public Housing Development: <i>Anita Complex</i>	PIC Development ID: <i>CO00200300</i>	Conversion Type: <i>PBV/PBRA</i>	Transfer of Assistance: <i>N/A</i>
Total Units: <i>8</i>	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development: <i>\$18,500.71 (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</i>
Bedroom Type:	Number of Units, pre-conversion:	Number of Units, post-conversion:	Change in number of units per bedroom type and why:
Efficiency:			
One Bedroom:			
Two Bedroom:	<i>6</i>	<i>6</i>	
Three Bedroom:	<i>2</i>	<i>2</i>	
Four Bedroom:			
Five Bedroom:			
(If performing a transfer of assistance)		Explain how transferring waiting list: Will begin housing from existing PBV waiting list.	

Development #4

Name of Public Housing Development: <i>Elmhurst Complex</i>	PIC Development ID: <i>CO00200300</i>	Conversion Type: <i>PBV/PBRA</i>	Transfer of Assistance: <i>N/A</i>
Total Units: <i>10</i>	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development: <i>\$23,125.89 (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</i>
Bedroom Type:	Number of Units, pre-conversion:	Number of Units, post-conversion:	Change in number of units per bedroom type and why:
Efficiency:			
One Bedroom:			
Two Bedroom:	<i>6</i>	<i>6</i>	
Three Bedroom:	<i>4</i>	<i>4</i>	
Four Bedroom:			
Five Bedroom:			
(If performing a transfer of assistance)		Explain how transferring waiting list: Will begin housing from existing PBV waiting list.	

Development #5

Name of Public Housing Development: West Street Complex	PIC Development ID: CO00200300	Conversion Type: PBV/PBRA	Transfer of Assistance: N/A
Total Units: 5	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development: \$11,562.95 (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type:	Number of Units, pre-conversion:	Number of Units, post-conversion:	Change in number of units per bedroom type and why:
Efficiency:			
One Bedroom:			
Two Bedroom:	4	4	
Three Bedroom:	1	1	
Four Bedroom:			
Five Bedroom:			
(If performing a transfer of assistance)	Explain how transferring waiting list: Will begin housing from existing PBV waiting list.		

Development #6

Name of Public Housing Development: <i>Greenwood Apartments</i>	PIC Development ID: <i>CO00200300</i>	Conversion Type: <i>PBV/PBRA</i>	Transfer of Assistance: <i>N/A</i>
Total Units: <i>10</i>	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development: <i>\$23,125.89 (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</i>
Bedroom Type:	Number of Units, pre-conversion:	Number of Units, post-conversion:	Change in number of units per bedroom type and why:
Efficiency:	<i>6</i>	<i>6</i>	
One Bedroom:	<i>4</i>	<i>4</i>	
Two Bedroom:			
Three Bedroom:			
Four Bedroom:			
Five Bedroom:			
(If performing a transfer of assistance)		Explain how transferring waiting list: Will begin housing from existing PBV waiting list.	

Development #7

Name of Public Housing Development: Ogden Apartments	PIC Development ID: CO00200300	Conversion Type: PBV/PBRA	Transfer of Assistance: N/A
Total Units: 25	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development: \$57,814.73 (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type:	Number of Units, pre-conversion:	Number of Units, post-conversion:	Change in number of units per bedroom type and why:
Efficiency:	16	16	
One Bedroom:	9	9	
Two Bedroom:			
Three Bedroom:			
Four Bedroom:			
Five Bedroom:			
(If performing a transfer of assistance)	Explain how transferring waiting list: Will begin housing from existing PBV waiting list.		

Development #8

Name of Public Housing Development: 16th Street Complex	PIC Development ID: CO00200400	Conversion Type: PBV/PBRA	Transfer of Assistance: N/A
Total Units: 15	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development: \$34,688.84 (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type:	Number of Units, pre-conversion:	Number of Units, post-conversion:	Change in number of units per bedroom type and why:
Efficiency:	10	10	
One Bedroom:	5	5	
Two Bedroom:			
Three Bedroom:			
Four Bedroom:			
Five Bedroom:			
(If performing a transfer of assistance)	Explain how transferring waiting list: Will begin housing from existing PBV waiting list.		

Development #9

Name of Public Housing Development: 12th Street Complex	PIC Development ID: CO00200400	Conversion Type: PBV/PBRA	Transfer of Assistance: N/A
Total Units: 6	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development: \$13,875.53 (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type:	Number of Units, pre-conversion:	Number of Units, post-conversion:	Change in number of units per bedroom type and why:
Efficiency:			
One Bedroom:	6	6	
Two Bedroom:			
Three Bedroom:			
Four Bedroom:			
Five Bedroom:			
(If performing a transfer of assistance)	Explain how transferring waiting list: Will begin housing from existing PBV waiting list.		

Development #10

Name of Public Housing Development: <i>Montezuma Apartments</i>	PIC Development ID: <i>CO00200400</i>	Conversion Type: <i>PBV/PBRA</i>	Transfer of Assistance: <i>N/A</i>
Total Units: <i>20</i>	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development: <i>\$46,251.78 (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</i>
Bedroom Type:	Number of Units, pre-conversion:	Number of Units, post-conversion:	Change in number of units per bedroom type and why:
Efficiency:			
One Bedroom:			
Two Bedroom:	<i>20</i>	<i>20</i>	
Three Bedroom:			
Four Bedroom:			
Five Bedroom:			
(If performing a transfer of assistance)		Explain how transferring waiting list: Will begin housing from existing PBV waiting list.	

Development #11

Name of Public Housing Development: <i>Mesa Tower</i>	PIC Development ID: <i>CO00200200</i>	Conversion Type: <i>PBV/PBRA</i>	Transfer of Assistance: <i>N/A</i>
Total Units: <i>103</i>	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development: <i>\$238,196.67 (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</i>
Bedroom Type:	Number of Units, pre-conversion:	Number of Units, post-conversion:	Change in number of units per bedroom type and why:
Efficiency:			
One Bedroom:	<i>102</i>	<i>102</i>	
Two Bedroom:			
Three Bedroom:	<i>1</i>	<i>1</i>	
Four Bedroom:			
Five Bedroom:			
(If performing a transfer of assistance)	Explain how transferring waiting list: Will begin housing from site-based waiting list		

Development #12

Name of Public Housing Development: Vail Hotel	PIC Development ID: CO00200200	Conversion Type: PBV/PBRA	Transfer of Assistance: N/A
Total Units: 56	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development: \$129,504.99 (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type:	Number of Units, pre-conversion:	Number of Units, post-conversion:	Change in number of units per bedroom type and why:
Efficiency:			
One Bedroom:	56	56	
Two Bedroom:			
Three Bedroom:			
Four Bedroom:			
Five Bedroom:			
(If performing a transfer of assistance)	Explain how transferring waiting list: Will begin housing from site-based waiting list		

Development #13

Name of Public Housing Development: <i>Minnequa Park Apartments</i>	PIC Development ID: <i>CO00200200</i>	Conversion Type: <i>PBV/PBRA</i>	Transfer of Assistance: <i>N/A</i>
Total Units: <i>40</i>	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development: <i>\$92,503.56 (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</i>
Bedroom Type:	Number of Units, pre-conversion:	Number of Units, post-conversion:	Change in number of units per bedroom type and why:
Efficiency:			
One Bedroom:	<i>40</i>	<i>40</i>	
Two Bedroom:			
Three Bedroom:			
Four Bedroom:			
Five Bedroom:			
(If performing a transfer of assistance)	Explain how transferring waiting list: Will begin housing from site-based waiting list		

Attachment: co002d01

**Housing Authority of the City of Pueblo
Organizational Chart**



Board of Commissioners

Frank Pacheco
Interim Executive Director

Joe Mahoney
Chief Operating Officer

Luanne Beard
Executive Administrative Assistant



Deb Dagnillo
Director of Human Resources

Sarah Habib
Special Projects Manager

Don Christenson
Director of Maintenance

Matthew Satterly
Systems Administrator

Joe Caricato
Director of Planning and Development

Cody Kuhlman
Director of Property Operations

Dave Hudson
Director of Finance

Ross Jarvis
AMP 200/300
Maintenance Foreman

Art Atteberry
AMP 100/400
Maintenance Foreman

Rick Martinez
AMP 500
Maintenance Foreman

Mark Martinez
504 Compliance Section 3
Coordinator

Eric Moore
Inspection Manager

Pat Rivas
Public Housing Property Manager

Laurie Polk
Leasing Manager

Paula White
Managed Properties Property Manager

