

Annual PHA Plan (Standard PHAs and Troubled PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
	<p><b>Purpose.</b> The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low-income, very low-income, and extremely low-income families.</p> <p><b>Applicability.</b> Form HUD-50075-ST is to be completed annually by <b>STANDARD PHAs or TROUBLED PHAs</b>. 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><b>Definitions.</b></p> <ol style="list-style-type: none"> <li>(1) <b>High-Performer PHA</b> – 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.</li> <li>(2) <b>Small PHA</b> – A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.</li> <li>(3) <b>Housing Choice Voucher (HCV) Only PHA</b> – 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.</li> <li>(4) <b>Standard PHA</b> – 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.</li> <li>(5) <b>Troubled PHA</b> – A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent</li> <li>(6) <b>Qualified PHA</b> – A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.</li> </ol>	

<b>A</b>	<b>PHA Information.</b>																									
<b>A.1</b>	<p> <b>PHA Name:</b> <u>Housing Authority of the City of Pueblo</u> <b>PHA Code:</b> <u>CO002</u> </p> <p> <b>PHA Type:</b> <input checked="" type="checkbox"/> Standard PHA      <input type="checkbox"/> Troubled PHA         </p> <p> <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>01/2022</u> </p> <p> <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning above)         </p> <p> <b>Number of Public Housing (PH) Units:</b> <u>818</u> </p> <p> <b>Number of Housing Choice Voucher (HCVs):</b> <u>1540</u> </p> <p> <b>Total Combined Units/Vouchers:</b> <u>2358</u> </p> <p> <b>PHA Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission      <input type="checkbox"/> Revised Annual Submission         </p> <p> <b>Availability of Information.</b> PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.         </p> <p> <b>The following are the specific locations where the public may obtain copies of the 2022 Annual PHA Plan:</b> </p> <p>           Housing Authority of the City of Pueblo            Leasing Department            1414 N. Santa Fe Avenue, 10<sup>th</sup> 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 100/400 Management Office            2601 Crawford Street            Pueblo, CO 81004         </p> <p> <input type="checkbox"/> <b>PHA Consortia:</b> (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>B</b>	<b>Plan Elements</b>																																										
<b>B.1</b>	<p><b>Revision of Existing PHA Plan Elements.</b></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 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><b>Statement of Housing Needs and Strategy for Addressing Housing Needs</b></p> <p><b><u>Statement of Housing Needs:</u></b></p> <p><b><u>Waiting List for Public Housing:</u></b></p> <p>Total: 927  Extremely Low Income: Data Not Available  Very Low Income: Data Not Available  Low Income: Data Not Available  Families with children: 42-5%  Elderly Families: 130-14%  Families with Disabilities: 301-32%  White: 253-27%  Black/African American: 32-3%  Asian: 14-2%  Hispanic: 628-68%</p> <p>Bedrooms:  1 BR: 486-52%</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 type="checkbox"/>	<input checked="" type="checkbox"/>	Substantial Deviation.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Significant Amendment/Modification
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B.1	<p>2 BR: 164-18%</p> <p>3 BR: 218-24%</p> <p>4 BR: 50-5%</p> <p>5 BR: 9-1%</p> <p>The waiting list for the 1 BR &amp; 4 BR have been closed for 1 month. The 2 BR has been closed since March 2020. The PHA does expect to reopen the list in the PHA Plan year.</p> <p><b><u>Waiting List for Section 8:</u></b></p> <p>Total: 118</p> <p>Extremely Low Income: Data Not Available</p> <p>Very Low Income: Data Not Available</p> <p>Low Income: Data Not Available</p> <p>Families with children: 2-2%</p> <p>Elderly Families: 7-6%</p> <p>Families with Disabilities: 12-10%</p> <p>White: 25-21%</p> <p>Black/African American: 8-7%</p> <p>Asian: 2-2%</p> <p>Hispanic: 83-70%</p> <p>The waiting list has been closed for 1 month. The PHA does expect to reopen the list in the PHA Plan year.</p> <p><b><u>Strategies for Addressing Housing Needs:</u></b></p> <p><b>Need: Shortage of affordable housing for all eligible populations</b></p> <p>PHA shall maximize the number of affordable units available to the PHA within its current resources by:</p> <ul style="list-style-type: none"> <li>▪ Reduce turnover time for vacated public housing units</li> <li>▪ Maintain or increase section 8 lease-up rates in establishing payment standards that will enable families to rent throughout the jurisdiction</li> </ul> <p>PHA deleted the following:</p> <ul style="list-style-type: none"> <li>▪ Reduce time to renovate public housing units</li> <li>▪ Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required</li> <li>▪ Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration</li> <li>▪ Maintain or increase section 8 lease-up by effectively screening Section 8 applicants to increase owner acceptance of program</li> <li>▪ Participate in the Consolidated Plan development process to ensure coordination with broader community strategies</li> </ul>
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B.1	<p>PHA shall increase the number of affordable units available to the PHA within its current resources by:</p> <ul style="list-style-type: none"> <li>▪ Leverage affordable housing resources in the community through the creation of mixed-finance housing</li> <li>▪ Pursue housing resources other than public housing or Section 8 tenant-based assistance</li> </ul> <p>PHA deleted the following:</p> <ul style="list-style-type: none"> <li>▪ Apply for additional Section 8 vouchers should they become available</li> </ul> <p><b>Need: Specific Family Types: Families at or below 30% of median</b></p> <p>PHA shall target available assistance to families at or below 30% of AMI by:</p> <ul style="list-style-type: none"> <li>▪ Homeless admission preference aimed at families actively experiencing homelessness</li> <li>▪ Exceed HUD federal targeting requirement for families at or below 30% of AMI in tenant-based section 8 assistance</li> </ul> <p>PHA added the following:</p> <ul style="list-style-type: none"> <li>▪ Exceed HUD federal targeting requirement for families at or below 30% of AMI in tenant-based section 8 assistance</li> </ul> <p><b>Need: Specific Family Types: Families at or below 50% of median</b></p> <p>PHA shall target available assistance to families at or below 50% of AMI by:</p> <ul style="list-style-type: none"> <li>▪ Advertising availability at local community agencies</li> <li>▪ Establish a preference for “working” families, where the head, spouse, cohead, or sole member is employed at least 20 hours per week. As required by HUD, families where the head and spouse, or sole member is a person age 62 or older, or is near elderly – age 55, or is a person with disabilities, will also be given the benefit of the working preference [24 CFR 960.206(b)(2)]</li> </ul> <p>PHA added the following:</p> <ul style="list-style-type: none"> <li>▪ Establish a preference for “working” families, where the head, spouse, cohead, or sole member is employed at least 20 hours per week. As required by HUD, families where the head and spouse, or sole member is a person age 62 or older, or is near elderly – age 55, or is a person with disabilities, will also be given the benefit of the working preference [24 CFR 960.206(b)(2)]</li> </ul> <p><b>Need: Specific Family Types: The Elderly</b></p> <p>PHA shall target available assistance to the elderly by:</p> <ul style="list-style-type: none"> <li>▪ Apply for special-purpose vouchers targeted to the elderly, should they become available</li> <li>▪ Maintain housing that is designated for elderly occupants</li> </ul> <p>PHA added the following:</p> <ul style="list-style-type: none"> <li>▪ Maintain housing that is designated for elderly occupants</li> </ul>
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B.1	<p><b>Need: Specific Family Types: Families with Disabilities</b></p> <p>PHA shall target available assistance to Families with Disabilities by:</p> <ul style="list-style-type: none"> <li>▪ Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing</li> <li>▪ Separating the current Public Housing wait list and have a stand-alone Section 504 ADA accessible wait list</li> <li>▪ Affirmatively market to local non-profit agencies that assist families with disabilities</li> </ul> <p>PHA added the following:</p> <ul style="list-style-type: none"> <li>▪ Affirmatively market to local non-profit agencies that assist families with disabilities</li> </ul> <p>PHA deleted the following:</p> <ul style="list-style-type: none"> <li>▪ Apply for special-purpose vouchers targeted to families with disabilities, should they become available</li> <li>▪ Employ admissions preference aimed at families with disabilities</li> </ul> <p><b>Need: Specific Family Types: Races or ethnicities with disproportionate housing needs</b></p> <p>PHA will conduct activities to affirmatively further fair housing by:</p> <ul style="list-style-type: none"> <li>▪ Counsel Section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units</li> </ul> <p>PHA deleted the following:</p> <ul style="list-style-type: none"> <li>▪ Market the Section 8 program to owners outside areas of poverty/minority concentrations</li> </ul> <p><b>Reasons for Selecting Strategies:</b></p> <ul style="list-style-type: none"> <li>▪ Funding constraints</li> <li>▪ Influence of the housing market on PHA programs</li> <li>▪ Community priorities regarding housing assistance</li> <li>▪ Results of consultation with local or state government</li> <li>▪ Results of consultation with residents and the Resident Advisory Board</li> <li>▪ Results of analysis for deconcentrating and income mixing</li> </ul> <p>PHA deleted the following:</p> <ul style="list-style-type: none"> <li>▪ Staffing constraints</li> <li>▪ Limited availability of sites for assisted housing</li> <li>▪ Extent to which particular housing needs are met by other organizations in the community</li> <li>▪ Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to PHA</li> </ul>
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B.1	<p><b>Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions</b></p> <p><b><u>Public Housing:</u></b></p> <p><b><u>Preferences:</u></b></p> <p>The PHA plans to employ the following admission preferences for admission to public housing:</p> <table border="1"> <thead> <tr> <th><b><u>Points</u></b></th><th><b><u>Preference</u></b></th></tr> </thead> <tbody> <tr> <td><u>110</u></td><td>- Victims of domestic violence</td></tr> <tr> <td><u>110</u></td><td>- Displacement due to federally declared disaster</td></tr> <tr> <td><u>105</u></td><td>- Applicant families who are actively experiencing homelessness. This preference will be limited to no more than 33% of unit offers per month.</td></tr> <tr> <td><u>105</u></td><td>- Applicant families who are actively employed</td></tr> <tr> <td><u>100</u></td><td>- Single persons who are elderly, displaced, homeless or persons with disabilities over other single persons</td></tr> <tr> <td><u>100</u></td><td>- Families that include a person with disabilities, but not for persons with a specific disability</td></tr> </tbody> </table> <p>PHA added the following:</p> <p><u>105</u> - Applicant families who are actively employed</p> <p><b><u>Maintaining Waiting List:</u></b></p> <p>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.</p> <p>The Housing Authority of the City of Pueblo does not plan to operate any site-based waiting lists.</p> <p>The Public Housing, one, three, four and five-bedroom waiting list are closed as of May 28, 2021. 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.</p> <p><b><u>Deconcentration and Income Mixing:</u></b></p> <p>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:</p>	<b><u>Points</u></b>	<b><u>Preference</u></b>	<u>110</u>	- Victims of domestic violence	<u>110</u>	- Displacement due to federally declared disaster	<u>105</u>	- Applicant families who are actively experiencing homelessness. This preference will be limited to no more than 33% of unit offers per month.	<u>105</u>	- Applicant families who are actively employed	<u>100</u>	- Single persons who are elderly, displaced, homeless or persons with disabilities over other single persons	<u>100</u>	- Families that include a person with disabilities, but not for persons with a specific disability
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**B.1**

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)]
CO2-01 Sangre de Cristo	89	A. Provide incentives designed to encourage families with incomes below the Established Income Range to accept units in developments with income above the Established Income Range, or vice versa, including rent incentives, affirmative marketing plans, or add amenities; and D. Skip a family on with waiting list to reach another family in an effort to further the goals of the PHA's de-concentration policy.	
CO2-02 Scattered	47	C. The Covered Development's size, location, and/or configuration promote income de-concentration, such as scattered site or small developments	
CO2-04 Scattered	78	C. The Covered Development's size, location, and/or configuration promote income de-concentration, such as scattered site or small developments	
CO2-05 Eastwood Heights	65	C. The Covered Development's size, location, and/or configuration promote income de-concentration, such as scattered site or small developments	
CO2-06 Hyde Park	57	C. The Covered Development's size, location, and/or configuration promote income de-concentration, such as scattered site or small developments	
CO2-09 Scattered	20	C. The Covered Development's size, location, and/or configuration promote income de-concentration, such as scattered site or small developments	
CO2-15 Scattered	12	C. The Covered Development's size, location, and/or configuration promote income de-concentration, such as scattered site or small developments	
CO2-18 Scattered	20	C. The Covered Development's size, location, and/or configuration promote income de-concentration, such as scattered site or small developments	
CO2-20 Scattered	38	C. The Covered Development's size, location, and/or configuration promote	



**B.1**

		income de-concentration, such as scattered site or small developments	
CO2-22 Scattered	6	C. The Covered Development's size, location, and/or configuration promote income de-concentration, such as scattered site or small developments	
CO2-27 Scattered	10	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 Section 8 waiting list is currently closed. The Housing Authority will reopen the waiting list as needed during FY 2022.

**Preferences:**

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

**Points      Preference**

<u>110</u>	- Victims of domestic violence
<u>110</u>	- Displacement due to federally declared disaster
<u>110</u>	- Transfers from Project-Based Voucher Section 8 units
<u>105</u>	- Applicant families who are actively experiencing homelessness. This preference will be limited to no more than 33% of unit offers per month.
<u>105</u>	- Applicant families who are actively employed
<u>100</u>	- Single persons who are elderly, displaced, homeless or persons with disabilities over other single persons
<u>100</u>	- Families that include a person with disabilities, but not for persons with a specific disability

PHA added the following:

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

PHA deleted the following:

<u>100</u>	- Working families and those unable to work because of disability
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**B.1****Financial Resources**

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants (FY 2022 grants)</b>		
a) Public Housing Operating Fund	3,833,908.00	
b) Public Housing Capital Fund	1,818,909.00	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	9,635,027.00	
f) Resident Opportunity and Self-Sufficiency Grants (FSS)	44,343.00	
g) Community Development Block Grant		
h) HOME		
Other Federal Grants (list below)		
Section 8 New Construction (MPT)	674,281.00	Operating Expenses
Farm Worker Housing (USDA)	71,580.00	Operating Expenses
Section 8 Moderate Rehabilitation	1,004,615.00	Operating Expenses & HAP's
<b>2. Prior Year Federal Grants (unobligated funds only) (list below)</b>		
CO 06P002501-19	1,133,396.00	Public housing capital improvements
CO 06P002501-20	1,332,836.00	Public housing capital improvements
<b>3. Public Housing Dwelling Rental Income</b>	2,466,413.00	Public housing operations
<b>4. Other income (list below)</b>		
Non-dwelling rent	32,273.00	Public housing operations
Interest on Investments	339.00	Public housing operations
Other Income: Legal fees, maintenance charges to tenants	23,454.00	Public housing operations
Late fees, NSF charges, etc.	4,250.00	Public housing operations
Non-dwelling rent	12,000.00	Public housing operations
Laundry commissions, vending machines, etc.	13,625.00	Public housing operations
<b>5. Non-federal sources (list below)</b>		
COCC Fee	349,343.00	Administration
Section 8 New Const. (MPT) Dwelling Rents	603,506.00	Operating expenses
Farm Labor Dwelling Rents	51,086.00	Operating expenses
Admin. Fees	62,484.00	Operating expenses
Interest Income on Mortgages	88,463.00	Operating expenses
Interest Income & Other Income FLP, COCC	573.00	Operating expenses
<b>Total resources</b>	<b>\$23,256,704.00</b>	

**B.1****Rent Determination****Public Housing:****Flat Rents:**

The PHA used the following sources of information in setting the market-based flat rents to establish comparability:

- Survey of rents listed in local newspaper
- Craigs List
- Online rental property comparison
- Guidelines found in the 2015 Appropriations Act (PIH 2015-13) in determining the Public Housing Flat Rent schedule. The PHA will established a flat rent for each public housing unit that is no less than 80% of the applicable Fair Market Rent (FMR) or no less than 80% of an applicable small area FMR (SAFMR)

The PHA added the following:

- Online rental property comparison

**Operation and Management****PHA Management Structure**

A brief description of the management structure and organization of the PHA. (See attachment co002e01)

**HUD Programs Under PHA Management:**

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	755	85
Section 8 Vouchers	1264	
Section 8 Certificates	N/A	N/A
Section 8 Mod Rehab	15	
Special Purpose Section 8 Certificates/Vouchers (list individually)	VASH Vouchers – 51	
Other Federal Programs (list individually)		
Section 8 PBV	82	
Section 202	93	
Section 8 New Construction	131	
Low-Income Housing Tax Credit	323	
U.S.D.A. Rural Development	18	

B.1	<p><b><u>Management and Maintenance Policies:</u></b></p> <p><b><u>Public Housing:</u></b></p> <ul style="list-style-type: none"> <li>▪ Admission and Continued Occupancy Policy (ACOP)</li> <li>▪ Grievance Procedures</li> <li>▪ Termination and Eviction Policy</li> <li>▪ Transfer and Transfer Waiting List Policy</li> <li>▪ Financial Policies (12)</li> <li>▪ Deconcentration and Income Targeting Policy</li> <li>▪ Pet Policy</li> <li>▪ File Access Policy</li> <li>▪ Resident Initiatives Policy</li> <li>▪ Records Retention Policy</li> <li>▪ Security Policy</li> <li>▪ Community Service Policy</li> <li>▪ Enterprise Income Verification (EIV) Security Policy</li> <li>▪ Maintenance Procedures Manual</li> <li>▪ Preventive Maintenance Policies and Procedures</li> <li>▪ Section 504 Grievance Procedure</li> <li>▪ Section 504 Reasonable Accommodation Policy and Procedure</li> <li>▪ Smoke Free Policy</li> <li>▪ VAWA Policy</li> <li>▪ Data Breach Policy</li> </ul> <p>PHA deleted the following:</p> <ul style="list-style-type: none"> <li>▪ Contagious and Infectious Disease Preparedness and Recovery Plan</li> </ul> <p><b>Homeownership Programs</b></p> <p><b>Section 8 Tenant Based Assistance:</b></p> <p>The PHA does administer a homeownership program for Section 8.</p> <p><b><u>Program Description:</u></b></p> <p>The PHA will limit the number of families participating in the Section 8 homeownership option to 26-50 participants (Currently 28)</p> <p>The PHA has not established criteria for participation in its Section 8 homeownership option program in addition to HUD criteria.</p>
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**B.1****Community Service and Self-Sufficiency Programs****Family Self Sufficiency Programs:**

<b>Family Self Sufficiency (FSS) Participation</b>		
<b>Program</b>	<b>Required Number of Participants</b>	<b>Actual Number of Participants (As of: <b>06/28/2021</b>)</b>
Public Housing	5	39
Section 8	0	15

**Community Service Implementation Report:**

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

(c) The PHA must submit its Deconcentration Policy of 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
- ☐ ☒ Hope VI or Choice Neighborhoods.
  - ☒ ☐ Mixed Finance Modernization or Development.
  - ☒ ☐ Demolition and/or Disposition.
  - ☐ ☒ Designated Housing for Elderly and/or Disabled Families.
  - ☐ ☒ Conversion of Public Housing to Tenant-Based Assistance.
  - ☒ ☐ Conversion of Public Housing to Project-Based Assistance under RAD.
  - ☐ ☒ Occupancy by Over-Income Families.
  - ☐ ☒ Occupancy by Police Officers.
  - ☐ ☒ Non-Smoking Policies.
  - ☒ ☐ Project-Based Vouchers.
  - ☐ ☒ Units with Approved Vacancies for Modernization.
  - ☐ ☒ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof,

**B.2**

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

### **Mixed Finance Modernization or Development**

The PHA may be engaging in any mixed-finance development activities for public housing in the Plan year depending on the availability of funds.

### **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.

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

**B.2**

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

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 will be completed in four phases using Rental Assistance Demonstration (RAD). The first phase Uplands Townhomes was completed in 2019 which converted 72 units. The second phase Mountain View Townhomes is near completion and will convert 47 units beginning in June 2021 and full conversion anticipated to be August 2021. The HACP was awarded 9% Low Income Tax Credits for the third phase, Crawford Townhomes. This phase will consist of 51 units with an anticipated end date of March 2024.

The PHA deleted the chart for demolition/disposition for Hyde Park Community Center and AMP 300 Scattered Site – 508 W. 14<sup>th</sup> 080056.

### **Conversion of Public Housing to Project-Based Assistance under RAD** (See attachment co002c01)

### **Project-Based Vouchers**

Our agency is currently operating or intends to operate a Section 8 Project Based Voucher Program.

Current number of units: 82

B.2	<p><u>General location(s) (eligible census tracts or area within eligible census tracts):</u></p> <p>Fenix, Central Grade, Palo Verde, and Ashwood Apartments</p> <p>PHA added Fenix.</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.</p> <p>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>PHA deleted the following statement:</p> <p>HACP to add if Rescue Homeless Mission secure funds, 10 PBV units and 10 VASH Project-Based Vouchers.</p>
B.3	<p><b>Progress Report.</b></p> <p>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><b>PHA GOAL #1: EXPAND THE SUPPLY OF ASSISTED HOUSING</b></p> <p>The PHA established the following objectives to strive in meeting goal #1:</p> <ul style="list-style-type: none"> <li>▪ Reduce public housing vacancies</li> <li>▪ Leverage private or other public funds to create additional housing opportunities</li> <li>▪ Acquire or build units or developments</li> </ul> <p><b><u>Progress Statement:</u></b> The Housing Authority of the City of Pueblo (HACP) has been awarded the 9% Low Income Housing Tax Credits which will fund the Crawford Townhomes, the third phase of a four phased project to convert a 212-unit public housing development, the Sangre de Cristo Apartment. This is being completed through HUD’s Rental Assistance Demonstration Program.</p> <p><b>PHA GOAL #2: IMPROVE THE QUALITY OF ASSISTED HOUSING</b></p> <p>The PHA established the following objectives to strive in meeting goal #2:</p> <ul style="list-style-type: none"> <li>▪ Demolish or dispose of obsolete public housing</li> <li>▪ Use the Rental Assistance Demonstration program to replace the Sangre de Cristo Apartments and other public housing developments</li> <li>▪ Convert public housing to Section 8 housing</li> </ul>



B.3	<p>PHA deleted the following objectives:</p> <ul style="list-style-type: none"> <li>▪ Improve public housing management (PHAS score)</li> <li>▪ Improve voucher management (SEMAP score)</li> <li>▪ Increase customer satisfaction</li> <li>▪ Renovate or modernize public housing units</li> </ul> <p><b><u>Progress Statement:</u></b> HACP will be repositioning 73 units of the public housing portfolio to Project Based Vouchers.</p> <p><b>PHA GOAL #3: INCREASE ASSISTED HOUSING CHOICES</b></p> <p>The PHA established the following objectives to strive in meeting goal #3</p> <ul style="list-style-type: none"> <li>▪ Conduct outreach efforts to potential voucher landlords</li> <li>▪ Increase voucher payment standards</li> <li>▪ Implement voucher homeownership program</li> </ul> <p>The PHA deleted the following objectives:</p> <ul style="list-style-type: none"> <li>▪ Convert public housing to vouchers</li> <li>▪ Increase use of Section 504 accessible units by creating a separate wait list for ADA accessible units</li> </ul> <p><b><u>Progress Statement:</u></b> HACP continues to do outreach with landlords by attending meetings and continues to be a member of the Southern Colorado Residential Rental Association and the Continuum of Care Meetings. HACP has a Homeownership Program that currently consists of 28 families.</p> <p><b>PHA GOAL #4: PROVIDE AN IMPROVED LIVING ENVIRONMENT</b></p> <p>The PHA established the following objectives to strive in meeting goal #4</p> <ul style="list-style-type: none"> <li>▪ Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments</li> <li>▪ Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments</li> <li>▪ Implement public housing security improvements</li> </ul> <p><b><u>Progress Statement:</u></b> HACP will be implementing the working preference for admissions to both the Section 8 and Public Housing programs. Monitor reports from DC Security who HACP has contracted as security. Staff attends the monthly meetings of the Pueblo Violence Coalition.</p>
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B.3	<p align="center"><b>PHA GOAL #5: PROMOTE SELF-SUFFICIENCY AND ASSET DEVELOPMENT OF ASSISTED HOUSEHOLDS</b></p> <p>The PHA established the following objectives to strive in meeting goal #5</p> <ul style="list-style-type: none"> <li>▪ Increase the number and percentage of employed persons in assisted families</li> <li>▪ Provide or attract supportive services to improve assistance recipients' employability</li> </ul> <p><b><u>Progress Statement:</u></b> HACP continues to ensure all residents have access to services provided within the Pueblo Community. Currently staff attends the monthly Continuum of Care meetings which shares current events and provides updates of resources the community is offering. HACP continues to educate residents about Section 3 opportunities via flyers and social media.</p> <p align="center"><b>PHA GOAL #6: ENSURE EQUAL OPPORTUNITY AND AFFIRMATIVELY FURTHER FAIR HOUSING</b></p> <p>The PHA established the following objectives to strive in meeting goal #6</p> <ul style="list-style-type: none"> <li>▪ Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status and disability</li> <li>▪ Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required</li> </ul> <p><b><u>Progress Statement:</u></b> The HACP has also implemented a waitlist for ADA-Accessible units. HACP will continue to train staff on fair housing.</p>
B.4	<p><b>Capital Improvements.</b> 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 Capital Fund 5 Year Action Plan in EPIC approved by HUD on <u>06/03/2020</u></p>
B.5	<p><b>Most Recent Fiscal Year Audit.</b></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: <b>(See attachment co002d01)</b></p>

<b>C.</b>	<b>Other Document and/or Certification Requirements.</b>
<b>C.1</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></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. <b>(See attachment co002a01)</b></p>
<b>C.2</b>	<p><b>Certification by State or Local Officials.</b></p> <p><i>Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. <b>(See attachment co002f01)</b></p>
<b>C.3</b>	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p><i>Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations - Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. <b>(See attachment co002f01)</b></p>
<b>C.4</b>	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y   N  <input type="checkbox"/>   <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements. <i>N/A</i></p>

C.5	<p><b>Troubled PHA.</b></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>
D.	<p><b>Affirmatively Furthering Fair Housing.</b></p>
D.1	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p> <p>Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <p><b>Fair Housing Goal:</b> Describe fair housing strategies and actions to achieve the goal:</p> <p><b>Strategies:</b></p> <ul style="list-style-type: none"> <li>▪ Increase the stock of affordable, accessible rental housing.</li> <li>▪ Expand the use of PBVs by utilizing the Section 18 repositioning.</li> </ul> <p><b>Action to achieve goal:</b></p> <ul style="list-style-type: none"> <li>▪ HACP will submit Section 18 applications to HUD for the disposition of units in the agency’s public housing portfolio. 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.</li> <li>▪ HACP will be repositioning 73 units of the public housing portfolio to Project-Based Vouchers. HACP has also partnered with Health Solutions and Cardinal Capital Management, Inc. in assisting “The Right Place” with 10 project-based vouchers and 10 project-based Veterans Assisted Supportive Vouchers.</li> </ul> <p><b>Strategies:</b></p> <ul style="list-style-type: none"> <li>▪ Increase access to affordable housing.</li> </ul> <p><b>Action to achieve goal:</b></p> <ul style="list-style-type: none"> <li>▪ HACP implemented a homeless preference for all HUD subsidized waiting lists and will be implementing a working preference for all HUD subsidized waiting lists.</li> </ul>

D.1	<ul style="list-style-type: none"> <li>▪ Maintain housing that is designated for elderly occupants. Apply for special purpose voucher targeted to the elderly, should they become available.</li> <li>▪ Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing.</li> </ul> <p><b>Strategies:</b></p> <ul style="list-style-type: none"> <li>▪ Increase support and services for residents of publicly supported housing and maintain and improve the quality and management of publicly supported housing.</li> </ul> <p><b>Action to achieve goal:</b></p> <ul style="list-style-type: none"> <li>▪ HACP will partner with supportive agencies and non-profits to provide support to residents (counseling, childcare, transportation).</li> <li>▪ Annually gather feedback from residents on the quality of management of publicly supported housing units and/or landlord related issues.</li> <li>▪ HACP will routinely disseminates information to its residents regarding employment and support services.</li> <li>▪ HACP routinely disseminates fair housing information to residents.</li> <li>▪ HACP staff to attend Fair Housing training, seminars and webinars.</li> </ul>
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**Attachment: co002a01**  
**Housing Authority of the City of Pueblo**  
**Resident Advisory Board Consultation Process and Comments – FYB 2022**

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 **July 21, 2021, August 4, 2021, and August 18, 2021**
4. Notification of Public Hearing  
  
Schedule date for Public Hearing and place ad **July 19, 2021**  
  
Hold Public Hearing meeting **September 2, 2021**
5. Documentation of resident recommendations and PHA's response to recommendations

# **HOUSING AUTHORITY OF THE CITY OF PUEBLO**

## **Resident Advisory Board Meeting Report**

Date: July 21, 2021  
Time: 3 pm  
Location: Central Management Facility (CMF)  
201 South Victoria Ave  
Pueblo, CO 81003

### **Meeting Data:**

Number of persons attending: 13

Names of Housing Communities represented: AMPS 100, 200, 300

HACP Staff: Steven Trujillo, Patricia Rivas, Jeff Corron, Joe Caricato, Daphne Martinez, Don Christenson, and Luanne Beard

### **Resident Advisory Board Minutes Summary:**

The meeting was called to order at 3 pm by Steven Trujillo, Assistant Executive Director. Mr. Trujillo thanked the residents for their participation. Introductions were made.

Ms. Rivas stated the annual plan is a requirement from HUD and is a comprehensive guide to the HACP's policies, programs, operations and strategies for meeting local housing needs and goals. The purpose of the Resident Advisory Board is to provide input for the 2022 annual plan as well as the 2022 capital funds. The first draft of the plan will be on the web site next week.

Due to the COVID pandemic, the 2021 plan did not go into effect until April 1, 2021; by all indications we are back on track for the 2022 plan to go into effect January 1, 2022

Ms. Rivas stated, currently, the only changes to the Admissions and Continued Occupancy Policy (ACOP) and Administration Plan is preference will be given to applicant families who are actively employed. Ms. Rivas stated this preference was in place prior but was taken out last year. Ms. Rivas reviewed the preferences for ACOP and Administration Plan (copy attached).

Ms. Rivas stated the new activities HACP intends to undertake in 2022 are:

- Mixed finance modernization or development
- Demolition and/or disposition
- Conversion of Public Housing to Project Based Assistance under RAD
- Project Based Vouchers

Copies of the proposed 2022 capital funds were distributed and reviewed by Mr. Corron. For 2022, slightly less than \$1,600,000 has been allocated; approximately \$650,000 will go towards demolition and asbestos abatement at the Sangre de Cristo Apartments; the remaining funds will go towards site or dwelling structure improvements.

### **Questions/Concerns/Comments**

- Was the working preference specifically taken out due to COVID? Ms. Rivas said she is not sure why, but it's something we definitely want back in.

- It's really apparent there is a lack of housing in Pueblo; through RAD will the number of housing units increase? Mr. Trujillo said Sangre de Cristo had 212 units and once all four phases are completed there will be 220 units.
- Concern about upkeep on the grounds at the new sites. Mr. Caricato said HACP will maintain the grounds at Uplands, Mountain View and ultimately Crawford and Sitter
- Security is an ongoing issue. Mr. Caricato stated security cameras have been installed at quite a few of the high-rise sites.
- What does AMP stand for? Asset Management Properties
- Ongoing issues with Mesa Tower elevators, is this a problem at all sites or just Mesa Tower? Mr. Christenson said we have had problems at Minnequa and Vail; those elevators have been refurbished. Mesa Tower elevator is on the schedule to be updated.
- How do tenants who are in wheelchairs get out if there is a fire and the elevators are down. Mr. Christenson said we have been working with the Fire Department and conducting fire drills. Mesa Tower's fire drill will be the end of July. In the event there is a real fire, the Fire Department will take the lead and they will access what needs to be done. In addition, the Fire Department will have access to confidential tenant information, i.e., mobility issues.
- Concern of roaches around the trash container area at the Ogden building; doors are often left open, and roaches come inside. Mr. Christenson said we will include the dumpster areas the next time the building is treated. Also, Ms. Martinez encouraged the residents to call in a work order anytime there is a problem, and we will have maintenance go check it out.
- Secured buildings, doors are being propped open. HACP will be sending out reminders to residents that secured doors are not to be left/propped open.
- What do you do when there is intimidation from residents not to "snitch" when there issues and/or problems? HACP's policy is all concerns/complaints are kept confidential. When we investigate, we will never disclose who initiated the concern/complaint. Often times when we come across issues, we will take the opportunity to remind all the residents in the building of what is expected and not target just one resident.
- Will dishwashers ever be installed in Mesa Tower? Mr. Christenson said probably not as there is not enough room in the kitchen. Mr. Caricato stated none of the Public Housing units have dishwashers.

Next meeting: Wednesday, August 4, 2021, 3 pm.

The meeting adjourned at 3:47 pm

PHA Staff Person Conducting Meeting: Patricia Rivas

First Presenter: Steven Trujillo

Second Presenter: Joe Caricato

Third Presenter: Jeff Corron

Fourth Presenter: Don Christenson

Fifth Presenter: Daphne Martinez



# **HOUSING AUTHORITY OF THE CITY OF PUEBLO**

## **Resident Advisory Board Meeting Report**

Date: August 4, 2021  
Time: 3 pm  
Location: Central Management Facility (CMF)  
201 South Victoria Ave  
Pueblo, CO 81003

### **Meeting Data:**

Number of persons attending: 10

Names of Housing Communities represented: AMPS 200, 300

HACP Staff: Steven Trujillo, Patricia Rivas, Jeff Corron, Daphne Martinez, Don Christenson, and Luanne Beard

### **Resident Advisory Board Minutes Summary:**

The meeting was called to order at 3 pm by Steven Trujillo, Assistant Executive Director. Mr. Trujillo thanked the residents for their participation. Introductions were made.

Ms. Rivas explained the purpose of this meeting is to obtain input from Housing Authority residents for the Agency's annual plan and capital funds. The annual plan is a requirement from HUD and is a comprehensive guide to the HACP's Admissions and Continue Occupancy Policy (ACOP) which governs public housing programs, Administration Plan (Admin Plan) which governs the Section 8 programs, operations and strategies for meeting local housing needs and goals.

The only change being made is to the wait lists for both the ACOP and Admin Plan. A preference will be given to applicant families who are actively employed.

New activities HACP intends to undertake in 2022 are:

- Mixed finance modernization or development
- Demolition and/or disposition
- Conversion of Public Housing to Project Based Assistance under RAD
- Project Based Vouchers

Ms. Rivas stated all of the aforementioned changes and additions to the plan are listed on our website.

### **Capital Funds for 2022**

Mr. Corron stated operating expenses, management improvements, management fees and direct fees and costs are allocated across all the AMPS. The proposed allocations for 2022 are:

#### **AMP 100**

- \$650,000 demolition and asbestos abatement for RAD Conversion at Sangre de Cristo Apartments

#### **AMP 200**

- \$60,000 Minnequa Park Apartments exterior painting
- \$300,000 Mesa Tower Apartments replace elevators

- \$43,000 Mesa Tower Apartments paint balconies
- \$25,000 Mesa Tower, Vail, Minnequa Apartments tree trimming
- \$36,000 Minnequa Apartments replace doors

### **AMP 300**

- \$25,000 tree trimming
- \$10,000 concrete/retaining walls
- \$5,000 Ogden Apartments installation of FOB unit
- \$75,000 Amarillo Apartments sewer main replacement

### **AMP 400**

- \$50,000 tree trimming
- \$6,000 fence replacement
- \$10,000 exterior painting

### **Questions/Concerns/Comments**

- Air purifiers are just sitting at Mesa Tower; how are they paid for, especially when they are not being used? Mr. Christenson said the machines have been pulled out of the areas that have dried out. As soon as the contractors feel everything is dried out, they will remove the machines. The site is checked daily. The damages are being paid for by insurance and not coming out of operating budget or cap funds.
- When will residents affected by the fire get to move back to Mesa Tower as it has already been two weeks? Mr. Christenson said everything (sheet rock, insulation, carpet, etc.) needs to dry out before the repairs can begin.
- Mesa Tower building not being cleaned. Mr. Christenson will address the issues with staff.
- Better security for buildings and parking areas. Mr. Trujillo stated we have been exploring Neighborhood Watch programs with the Pueblo Police Department.
- How do we go about welfare checks on tenants? Tenants were instructed to call Pueblo Police Department for all welfare checks.
- What can be done regarding tenants throwing items off balconies? Mr. Trujillo said it starts with reminding all the tenants what the expectations and standards are. Ms. Martinez asked if tenants do see something that is not right to let staff know immediately. All information is kept confidential; we will never disclose who filed the complaint. At the same time, we will not disclose to the tenant filing the complaint what was discussed. All complaints are documented.
- What can be done to get a larger trash can? Mr. Trujillo said to get with Mr. Christenson following this meeting to discuss options.
- When do we start working to make money to pay for security? Mr. Trujillo stated the funding we receive is a result of being a nonprofit/quasi-governmental entity in working with HUD and executing the programs that we have. Because of our funding source and the way that the programs operate, we are bound by very strict guidelines.
- Mr. Trujillo reminded everyone that the telephone lines and email boxes are always open. We are working to reopen our offices, however, the safety of our residents and staff as we go through this global pandemic is priority.

Next meeting: Wednesday, August 18, 2021, 3 pm.

The meeting adjourned at 3:47 pm

PHA Staff Person Conducting Meeting: Patricia Rivas

First Presenter: Steven Trujillo

Second Presenter: Jeff Corron

Third Presenter: Don Christenson

Fourth Presenter: Daphne Martinez

# **HOUSING AUTHORITY OF THE CITY OF PUEBLO**

## **Resident Advisory Board Meeting Report**

Date: August 18, 2021  
Time: 3 pm  
Location: Central Management Facility (CMF)  
201 South Victoria Ave  
Pueblo, CO 81003

### **Meeting Data:**

Number of persons attending: 10

Names of Housing Communities represented: AMPS 200, 300

HACP Staff: Steven Trujillo, Patricia Rivas, Jeff Corron, Daphne Martinez, Joe Caricato and Luanne Beard

### **Resident Advisory Board Minutes Summary:**

The meeting was called to order at 3 p.m. by Steven Trujillo, Assistant Executive Director. Introductions were made. Mr. Trujillo thanked the residents for their participation. Mr. Trujillo reminded everyone this is the last Resident Advisory Board meeting for input on the annual plan. The public hearing will be held Thursday, September 2, 2021 at 3pm here at CMF; all were encouraged to attend.

Ms. Rivas stated she has received notification HUD is requiring authorities to put together an Affirmatively Furthering Fair Housing Plan. This is the only change to the annual plan from the past two Resident Advisory Board meetings. The plan is not due at this time. Ms. Rivas will be working on goals and strategies on how we can attain fair housing issues for the Agency. She went on to say what this plan will be looking at is how we are accepting applicants and where we are housing tenants. Adverse impediments of the community as well as the City's consolidated plan will be taken in to account. Once approved, this plan will be required on any multifamily project that we have.

Mr. Corron stated capital funds have not changed since the last meeting. AMP 100 will receive \$650,000; AMP 200 \$464,000; AMP 300 \$115,000 and AMP 400 \$66,000 in capital funds for improvements.

### **Questions/Concerns/Comments**

- What is a FOB for the Ogden Apartments? Ms. Martinez said a FOB is a keyless entry system that will be used for the building entry doors, not apartment door.
- Why the need for a FOB, there's not a problem with the keys? Ms. Martinez said it helps Management in tracking who comes into the buildings for security purposes. With the FOBs, not only can we track who is going into a building, but we can deactivate when necessary. In addition, if the resident has their hands full, all they need to do is hold the FOB up to the reader to open the door.
- When will the FOB be installed and will notice be given? Mr. Caricato did not know the exact timeline for installation. (Mr. Christenson was not present to answer the question) Ms. Martinez did say tenants will receive ample notification as well as instructions on how it works.
- How will delivery people such as Amazon get it? Mr. Caricato said there is apartment call box at the Ogden; you will need a land line phone, but you do

not need an actual land line. We will look into how this can be improved at all housing sites as more and more people are having items delivered. Parcel lockers could be a solution.

- Can clarification be made regarding the notices received regarding building gatherings at the Minnequa Apartments? Ms. Martinez said residents can start using the common areas for building resident gatherings, but all buildings are still closed to outside gatherings. Mr. Trujillo said we will put out a clarification.
- Can the community bathrooms on the first floor at the Ogden be unlocked? Ms. Martinez said the bathrooms were locked due to vandalism. Management will explore reopening the community bathrooms.
- Can the pool table be removed from the community room at the Ogden? Ms. Martinez said it would be evaluated.
- Can dog ownership at the Minnequa Apartments be addressed? There are a few tenants who are not taking their animals out fast enough resulting in "messes" in the hallway; animals are off leash. Ms. Martinez said she would put out a memo reminding everyone about their animals and what their responsibilities are.

The meeting adjourned at 3:33 pm

PHA Staff Person conducting meeting: Pat Rivas

First Presenter: Steven Trujillo

Second Presenter: Jeff Corron

Third Presenter: Daphne Martinez

Fourth Presenter: Joe Caricato

**HOUSING AUTHORITY OF THE CITY OF PUEBLO  
PUBLIC HEARING**

Date: September 2, 2021  
Time: 3 pm  
Location: Central Management Facility (CMF)  
201 South Victoria Ave  
Pueblo, CO 81003

**Hearing Data:**

Number of persons attending: 9  
Names of Housing Communities represented: AMP 200  
HACP Staff: Steven Trujillo, Patricia Rivas, Jeff Corron, Joe Caricato, Daphne Martinez, and Luanne Beard

**Hearing Minutes Summary:**

The public hearing for the Housing Authority of the City of Pueblo 2022 Annual Plan was called to order at 3:13 p.m. by Steven Trujillo, Assistant Executive Director. Mr. Trujillo thanked everyone for participating. Public testimony cards were distributed. Mr. Trujillo and Ms. Rivas reviewed the proposed changes for the 2022 Annual Plan (copy attached). Mr. Trujillo opened the meeting for comments.

**Comments**

- One resident asked if building security is being considered? Mr. Trujillo said yes, security is always ongoing.

There being no further comments, Mr. Trujillo closed the hearing at 3:22 p.m.

PROPOSED CHANGES  
FY2022 ANNUAL PHA PLAN

The Housing Authority Plans to add the following admission preferences for admission to the public housing program as well as Section 8 tenant-based assistance

- Applicant families who are actively employed.

The new activities that the Housing Authority intends to undertake in 2022

- Mixed finance modernization or development
- Demolition and/or disposition
- Conversion of public housing to project based assistance under RAD
- Project based vouchers
- Affirmatively Furthering Fair Housing Plan

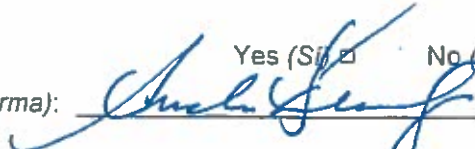
Public Testimony Card  
*Tarjeta de Testimonio*  
Five-Year Agency Plan and Annual Plan Public Hearing  
*Audencia Publica para Plan Anual de La Agencia*

(Bi-Lingual Version)

Please complete the following (please print):  
*Por Favor escriba en letras legible esta información:*

Name (Nombre): Andrea Selazarza (Pueblo Urban Renewal)  
Address (Dirección): 115 E. Riverwalk, Ste 410  
Pueblo, CO 81003

Are you in favor of the Housing Authority receiving funding for the Annual Agency Plan for this year? *Está en favor de la agencia recebiendo fondos para el Plan Anual de La Agencia*

Yes (Sí) ☒ No (No) ☐  
Signature (Firma):  Date (Fecha): 9/2/21

Testimony is limited to three (3) minutes per participant  
*Su testimonio está limitado a 3 minutos por persona*



Public Testimony Card  
*Tarjeta de Testimonio*  
Five-Year Agency Plan and Annual Plan Public Hearing  
*Audencia Publica para Plan Anual de La Agencia*

(Bi-Lingual Version)

Please complete the following (please print):

*Por Favor escriba en letras legible esta información:*

Name (Nombre):

PEGGY A. CONLEY

Address (Dirección):

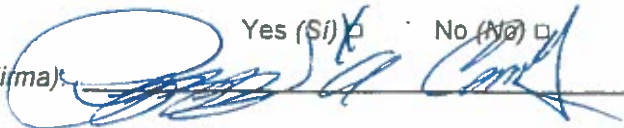
260 LAMAR AVE. APT. 901

Are you in favor of the Housing Authority receiving funding for the Annual Agency Plan for this year? *Está en favor de la agencia recebiendo fondos para el Plan Anual de La Agencia*

Yes (Sí) ☒

No (No) ☐

Signature (Firma):



Date (Fecha):

9-2-2021

Testimony is limited to three (3) minutes per participant  
*Su testimonio está limitado a 3 minutos por persona*

The **Nelrod** Consortium

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Public Testimony Card  
*Tarjeta de Testimonio*  
Five-Year Agency Plan and Annual Plan Public Hearing  
*Audencia Publica para Plan Anual de La Agencia*

(Bi-Lingual Version)

Please complete the following (please print):  
*Por Favor escriba en letras legible esta información:*

Name (Nombre):

JERRY M. PACHECO

Address (Dirección):

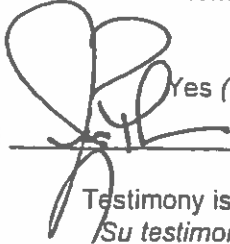
115 E. Riverwalk, Suite 410  
Pueblo, Co 81003

Are you in favor of the Housing Authority receiving funding for the Annual Agency Plan for this year? *Está en favor de la agencia receiviendó fondos para el Plan Anual de La Agencia*

Yes (Sí) ☒

No (No) ☐

Signature (Firma):



Date (Fecha):

9/2/2021

Testimony is limited to three (3) minutes per participant  
*Su testimonio está limitado a 3 minutos por persona*

**The Nelrod Consortium**

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**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.: 1881**

**Date of Adoption: November 18, 2004**

**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 **212** 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	<b>RAD PBRA</b>	<b>48</b>	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.

Development	PIC ID	Conversion Type	Transfer of Assistance	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	TOTAL
Sangre de Cristo Apartments	CO002-01	RAD		0	25	112	53	22	0	212
Scattered Sites	CO002-02	Section 18		0	28	0	22	4	1	55
Mesa Tower Apartments	CO002-03	RAD		0	102	0	1	0	0	103
Greenwood Apartments	CO002-04	RAD		6	4	0	0	0	0	10
Ogden Apartments	CO002-04	RAD		16	9	0	0	0	0	25
Scattered Sites	CO002-04	Section 18		0	4	8	14	12	5	43
Eastwood Heights	CO002-05	Section 18		0	0	10	15	13	6	44
Amarillo Apartments	CO002-05	RAD		10	11	0	0	0	0	21
West 16th Complex	CO002-06	RAD		10	5	0	0	0	0	15
West 12th Complex	CO002-06	RAD		0	6	0	0	0	0	6
Scattered Sites	CO002-06	Section 18		0	0	11	14	5	6	36
Morris Duplexes	CO002-08	RAD		0	0	6	0	0	0	6
Scattered Sites	CO002-08	Section 18		0	2	25	14	1	0	42
Scattered Sites	CO002-09	Section 18		0	10	7	3	0	0	20
Anita Complex	CO002-10	RAD		0	0	6	2	0	0	8

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

perseveration 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 through a Housing Assistance Payment contract.

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: Amarillo Apartments	PIC Development ID: CO00200300	Conversion Type: PBV/PBRA	Transfer of Assistance: N/A
Total Units:  21	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development:  \$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)
Bedroom Type:	Number of Units, pre-conversion:	Number of Units, post-conversion:	Change in number of units per bedroom type and why:
Efficiency:	11	11	
One Bedroom:	10	10	
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: Morris Duplexes	PIC Development ID: CO00200300	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:			
Two Bedroom:	6	6	
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: Anita Complex	PIC Development ID: CO00200300	Conversion Type: PBV/PBRA	Transfer of Assistance: N/A
Total Units:  8	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development:  \$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)
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:	6	6	
Three Bedroom:	2	2	
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: Elmhurst Complex	PIC Development ID: CO00200300	Conversion Type: PBV/PBRA	Transfer of Assistance: N/A
Total Units:  10	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development:  \$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)
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:	6	6	
Three Bedroom:	4	4	
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: Greenwood Apartments	PIC Development ID: CO00200300	Conversion Type: PBV/PBRA	Transfer of Assistance: N/A
Total Units:  10	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development:  \$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)
Bedroom Type:	Number of Units, pre-conversion:	Number of Units, post-conversion:	Change in number of units per bedroom type and why:
Efficiency:	6	6	
One Bedroom:	4	4	
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: Montezuma Apartments	PIC Development ID: CO00200400	Conversion Type: PBV/PBRA	Transfer of Assistance: N/A
Total Units:  20	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development:  \$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)
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:	20	20	
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: Mesa Tower	PIC Development ID: CO00200200	Conversion Type: PBV/PBRA	Transfer of Assistance: N/A
Total Units:  103	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development:  \$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)
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:	102	102	
Two Bedroom:			
Three Bedroom:	1	1	
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: Minnequa Park Apartments	PIC Development ID: CO00200200	Conversion Type: PBV/PBRA	Transfer of Assistance: N/A
Total Units:  40	Pre-RAD Unit Type:	Post-RAD Unit Type, if different:	Capital Fund Allocation of Development:  \$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)
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:	40	40	
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**

**Fiscal Year Audit Findings**

## **Preparation of Financial Statements and Material Adjusting Journal Entries**

### **Material Weakness in Internal Control over Financial Reporting**

*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 in order to prepare accurate and complete financial statements for the Authority.

*Condition* – As part of the audit, we proposed material audit adjustments to the financial statements 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 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. 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.

### **Lack of Regular Reconciliation of Rental Revenue**

#### **Significant Deficiency in Internal Control over Financial Reporting**

*Criteria* – A good system of internal control contemplates an adequate system for reconciling and adjusting accounts that are significant or material to the financial statements in order to prepare accurate and complete financial statements for the Authority on an interim basis.

*Condition* – As part of the audit, it was identified that monthly rental revenue amounts were not reconciled to reflect accurate revenue earned in the period.

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

*Effect* – The control deficiency could result in a misstatement to the interim financial statements that would not be prevented or detected, and rental revenue reported could be incomplete or incorrect.

*Cause* – Due to oversight by management, not all accounts were reconciled or reviewed on a regular basis to ensure proper recording of monthly rental revenue.

*Recommendation* – We recommend that rental revenue is reviewed and reconciled on a monthly basis to ensure interim amounts are properly reported.

*Views of Responsible Officials* – Management agrees with the finding.

## **Improper Use of Public Housing Funds**

### **Noncompliance Material to the Financial Statements**

*Criteria* – The Authority is to utilize public housing funds in compliance with program requirements and limitations. HUD restricts the transfer of these funds out of the program, unless previously approved.

*Condition* – During the audit, it was identified that public housing program funds of \$877,500 were utilized to pay for construction costs of a related RAD conversion project in development, which was not approved by HUD.

*Effect* – The improper transfer of these funds is not in accordance with HUD guidance.

*Cause* – Due to oversight by management, funds were expended in excess of approved amounts to cover construction costs of a related project.

*Recommendation* – We recommend that the funds are repaid to the public housing program and that processes are implemented to prevent unauthorized transfers in the future.

*Views of Responsible Officials* – Management agrees with the finding.

## **U.S. Department of Housing and Urban Development - CFDA #14.871 Section 8 Housing Choice Vouchers**

### **Applicable Federal Award Number and Year – Section 8 Housing Choice Vouchers - 2019 Special**

#### **Tests and Provisions – HQS Enforcement**

### **Significant Deficiency in Internal Control over Compliance**

*Criteria* – For units under HAP contract that fail to meet HQS, the PHA must require the owner to correct life threatening HQS deficiencies within 24 hours after the inspections and all other

HQS deficiencies within 30 calendar days or within a specified PHA-approved extension.

*Condition* – During our testing of failed HQS inspections, we identified 4 instances in which the process to request an extension for the repairs to be made was not followed or documented. In addition, we identified one instance where a life-threatening issue was not resolved within 24 hours.

*Questioned Costs* – None Reported.

*Context/Sampling* – A non-statistical sample of 60 failed inspections were selected for testing. 4 out of the 60 failed inspections did not have proper documentation indicating an extension was granted to the landlord.

*Effect* – Failure to implement a proper control process could result in failure to complete the required inspections in the required time period, resulting in unauthorized payments.

*Cause* – Due to a lack of oversight, extensions were not properly documented.

*Repeat Finding from Prior Year* - No.

*Recommendation* – The Authority should ensure that processes are implemented to ensure proper enforcement and documentation of extension requirements.

*Views of Responsible Officials* – Management agrees with the finding.

**Attachment: co002e01**

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





Dr. John Ribal  
Chairman

Jack Quinn  
Vice Chairman

Melanie Bravo  
Commissioner

Andrea Aragon  
Commissioner

Resident  
Commissioner

Board of Commissioners

Frank Pacheco  
Executive  
Director

Luanita Beard  
Executive  
Administrative  
Assistant

Steven Trujillo  
Asst Executive  
Director

Jeff Goran  
Director of  
Finance

Don Christensen  
Director of  
Maintenance

Deb Dagnino  
Director of Human  
Resources

Joe Canalis  
Director of Planning and  
Development

Ryan Martinez  
AMP 200/300  
Maintenance  
Foreman

Ross Jarvis  
AMP 100/400  
Maintenance  
Foreman

Art Altberry  
AMP 500  
Maintenance  
Foreman

Mark Martinez  
504 Compliance  
Section 3 /  
Coordinator

Eric Moore  
Inspection  
Manager

Daphne Martinez  
Public Housing  
Property Manager

Matthew Satterly  
Systems  
Administrator

Pat Rivas  
Leasing Manager

Paula White  
LIHTC-Ming  
Properties  
Manager

Dave Hudson  
Sr Accountant

Eric Esquivel  
Maintenance  
Technician

Cody DuVal  
Maintenance  
Technician

Frank Razo  
Maintenance  
Technician

Alberto Romero  
Maintenance  
Technician

Ken Hart  
Maintenance  
Technician

Fallon Miller  
P&D Coordinator

Tina Jimenez  
Inspector

Jackie Sanchez  
Assistant  
Property Manager

Elena Solis  
Assistant  
Property Manager

Selena Garza  
Leasing  
Technician

Maya Rodriguez  
Leasing  
Technician

Nicki Ayers  
Management  
Technician

Glen Workman  
Financial Analyst

Ted Garcia  
Maintenance  
Helper

Bryan Arellano  
Maintenance  
Technician

John Garcia  
Maintenance  
Technician

Ray More  
Maintenance  
Technician

Amabel Rabago  
Maintenance  
Technician

Edward Korman  
Project Planner/  
Construction  
Manager

Gary Quintana  
Inspector

Ashleigh Hill  
Management Tech

Sarah Satterly  
Management Tech

Kaylyn Adeyde  
Leasing  
Technician

Shannon Garcia  
Leasing  
Technician

Sandy Solis  
Management  
Technician

Larissa  
Bourgeois  
Accountant II

Ron Marquez  
Maintenance  
Helper

Ray Mitchell  
Maintenance Tech

Mark Davis  
Maintenance  
Technician

Bill Lynch  
Maintenance  
Technician

Bryan Broome  
Maintenance  
Technician

Jessica Valdez  
P&D Admin Asst

Cosme Gomez  
Inspector

Rafael Herrera  
CMF Receptionist

Donna Jaramila  
Work Order  
Specialist

Rui Croson  
Leasing  
Technician

Sandy Porco  
Leasing  
Technician

Becky Tomosch  
Management  
Technician

Kimmi Jordan  
Accountant I

Jason Almanaz  
Painter

Tony Estriguez  
Maintenance  
Helper

Denise Chavez  
Painter

Emesto Montano  
Maintenance  
Helper

Jessica Valdez  
P&D Admin Asst

Cosme Gomez  
Inspector

Joanita Vicharek  
Resident Liaison

Alex Torres  
FSS Coordinator

Amelia Sator  
MPT Receptionist

Christine Aron  
Leasing  
Technician

Carla Osano  
Accounting  
Assistant

Scott Litton  
Maintenance  
Helper

Orlando Soblan  
Maintenance  
Helper

Jay Valdez  
Maintenance  
Helper

Jessica Valdez  
P&D Admin Asst

Cosme Gomez  
Inspector

Joanita Vicharek  
Resident Liaison

Alex Torres  
FSS Coordinator

Amelia Sator  
MPT Receptionist

Christine Aron  
Leasing  
Technician

Carla Osano  
Accounting  
Assistant

Ken Wyckoff  
Maintenance  
Helper

Louise Sanchez  
Accounting Tech

Cheri Wilkerson  
Procurement/Risk  
Coordinator

Art Urrutia  
Warehouse  
Technician

**Attachment: co002f01**  
**Housing Authority of the City of Pueblo**  
**Certifications for FYB 2022 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 – Resolution #2332**

**Form HUD-50077-SL: Certification by State or Local Office of PHA  
Consistency with the Consolidated Plan or State  
Consolidated Plan**

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

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

**PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations  
including PHA Plan Elements that Have Changed  
RESOLUTION #2332**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year and/or X Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 01/01/2022, 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 (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
  - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
  10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
  11. 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.
  12. 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.
  13. 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.
  14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
  15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
  16. 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.
  17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
  18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
  19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
  20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
  21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
  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 2022

\_\_\_\_ 5-Year PHA Plan for Fiscal Years 20 \_\_\_\_ - 20 \_\_\_\_

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 Executive Director

Frank D. Pacheco

Signature

 Date 9/16/2021

Name Board Chairman

Jack Quinn

Signature



Date 9/16/2021

---

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

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

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

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

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

I, Nicholas A. Gradisar, the Mayor of the City of Pueblo  
*Official's Name* *Official's Title*

certify that the 5-Year PHA Plan for fiscal years \_\_\_\_\_ and/or Annual PHA Plan for fiscal  
year 2022 of the Housing Authority of the City of Pueblo, Colorado is consistent with the  
*PHA Name*

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair  
Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

City of Pueblo, Colorado

*Local Jurisdiction Name*

pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7(o)(3) and 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or  
State Consolidated Plan.

The FY2022 PHA Plan is consistent with the actions taken to address the needs of Public Housing  
and the actions taken to encourage public housing residents to become more involved in  
management and participation in homeownership that are detailed in the City of Pueblo  
Consolidated Annual Performance and Expenditures Report.

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 Executive Director:  
**Frank D. Pacheco**

Name Board Chairperson:  
**Jack Quinn**

Signature



Date **9/16/2021**

Signature



Date **9/16/2021**

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Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information  
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ensure consistency with the consolidated plan or state consolidated plan.

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