

# PHA Plans for the Housing Authority of the City of Pueblo Annual Plan for FYB 2023

Steven Trujillo, Executive Director

FYB January 1, 2023

## FINAL DRAFT



Presented by:

The **Nelrod** Company

3301 West Fwy.  
Fort Worth, Texas 76107  
(817) 922-9000/FAX (817) 922-9100

Satellite Offices: Washington, D.C.; Houston, TX

E-Mail Address: [info@nelrod.com](mailto:info@nelrod.com)

Web Site: [www.nelrod.com](http://www.nelrod.com)

© 2020 The Nelrod Company, Fort Worth, Texas 76107

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

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

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

**Definitions.**

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a higher performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** – A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** – A PHA that administers more the 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** – A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** – A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent
- (6) **Qualified PHA** – A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

<b>A</b>	<b>PHA Information.</b>																								
<b>A.1</b>	<b>PHA Name:</b> <u>Housing Authority of the City of Pueblo</u>		<b>PHA Code:</b> <u>CO002</u>																						
	<b>PHA Type:</b> <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA																								
	<b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>01/2023</u>																								
	<b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning above)																								
	<b>Number of Public Housing (PH) Units:</b> <u>742</u>																								
	<b>Number of Housing Choice Voucher (HCVs):</b> <u>1308</u>																								
	<b>Total Combined Units/Vouchers:</b> <u>2050</u>																								
	<b>PHA Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission																								
	<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 2023 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>																								
	<input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a joint PHA Plan and complete table below)																								
	<table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <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:											
Participating PHAs	PHA Code	Program(s) in the Consortia	Programs Not in the Consortia	No. of Units in Each Program																					
				PH	HCV																				
Lead HA:																									

**B Plan Elements**

**B.1 Revision of Existing PHA Plan Elements.**

(a) Have the following PHA Plan elements been revised by the PHA?

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources.
- Rent Determination.
- Operation and Management.
- Grievance Procedures.
- Homeownership Programs.
- Community Service and Self-Sufficiency Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Asset Management.
- Substantial Deviation.
- Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

**Statement of Housing Needs and Strategy for Addressing Housing Needs**

**Statement of Housing Needs:**

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Loca-tion
Income <= 30% of AMI	9501	4	4	3	4	4	3
Income >30% but <=50% of AMI	8715	4	4	3	4	4	3
Income >50% but <80% of AMI	12010	4	4	3	4	4	3
Elderly	2965	4	3	3	5	4	4
Families with Disabilities	N/A	N/A	N/A	N/A	N/A	N/A	N/A
White	9070	4	4	3	4	4	3
Black/African American	247	4	4	3	4	4	3
Hispanic	9388	4	4	3	4	4	3
Native American	150	4	4	3	4	4	3
Asian	164	4	4	3	4	4	4

**B.1 Waiting List for Public Housing:**

*Total: 438*

*Extremely Low Income: Data Not Available*

*Very Low Income: Data Not Available*

*Low Income: Data Not Available*

*Families with children: 13-3%*

*Elderly Families: 45-10%*

*Families with Disabilities: 94-21%*

*White: 130-30%*

*Black/African American: 19-4%*

*Asian: 7-2%*

*Hispanic: 282-64%*

***Bedrooms:***

*1 BR: 163-37%*

*2 BR: 142-32%*

*3 BR: 116-26%*

*4 BR: 17-4%*

*The waiting list has been closed for one month. HACP does expect to reopen the list in the PHA Plan year.*

**Waiting List for Public Housing Site-Based (Uplands):**

*Total: 152*

*Extremely Low Income: Data Not Available*

*Very Low Income: Data Not Available*

*Low Income: Data Not Available*

*Families with children: 11-7%*

*Elderly Families: 15-10%*

*Families with Disabilities: 39-26%*

*White: 48-32%*

*Black/African American: 4-3%*

*Asian: 3-2%*

*Hispanic: 97-64%*

***Bedrooms:***

*1 BR: 69-45%*

*2 BR: 56-37%*

*3 BR: 27-18%*

*The waiting list is not closed.*

**B.1 Waiting List for Section 8:**

*Total: 141*

*Extremely Low Income: Data Not Available*

*Very Low Income: Data Not Available*

*Low Income: Data Not Available*

*Families with children: 6-4%*

*Elderly Families: 13-9%*

*Families with Disabilities: 40-28%*

*White: 39-28%*

*Black/African American: 1-1%*

*Asian: 1-1%*

*Hispanic: 100-71%*

*The waiting list has been closed for 13 months. HACP does expect to reopen the list in the PHA Plan year.*

**Strategies for Addressing Housing Needs:**

**Need: Shortage of affordable housing for all eligible populations**

Housing Authority of the City of Pueblo (HACP) shall maximize the number of affordable units available to the HACP within its current resources by:

- *Employee effective maintenance and management policies to minimize the number of public housing units off-line*
- Reduce turnover time for vacated public housing units
- Maintain or increase Section 8 lease-up rates in establishing payment standards that will enable families to rent throughout HACP's jurisdiction

*HACP added the following:*

- *Employee effective maintenance and management policies to minimize the number of public housing units off-line*

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

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

- Homeless admission preference aimed at families actively experiencing homelessness
- Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance *and in public housing*
- *Adopt rent policies to support and encourage work*

*HACP added the following:*

- *To the 2<sup>nd</sup> bullet, "and in public housing"*
- *Adopt rent policies to support and encourage work*

**B.1 Need: Specific Family Types: Families at or below 50% of median**

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

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

*HACP deleted the following:*

- *Advertising availability at local community agencies*
- *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)].*

*HACP added the following:*

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

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

HACP shall target available assistance to the elderly by:

- *Employ admissions preference aimed at the elderly*

*HACP deleted the following:*

- *Apply for special-purpose vouchers targeted to the elderly, should they become available*
- *Maintain housing that is designated for elderly occupants*

*HACP added the following:*

- *Employ admissions preference aimed at the elderly*

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

HACP shall target available assistance to Families with Disabilities by:

- *Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing*
- *Separating the current public housing wait list and have a stand-alone Section 504 ADA accessible wait list*

*HACP deleted the following:*

- *Affirmatively market to local non-profit agencies that assist families with disabilities*

**B.1 Need: Specific Family Types: Races or ethnicities with disproportionate housing needs**

HACP will increase awareness of HACP resources among families of races and ethnicities with disproportionate needs by:

- Affirmatively market to races/ethnicities shown to have disproportionate housing needs

*HACP deleted the following:*

*HACP will conduct activities to affirmatively further fair housing by:*

- *Counsel Section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units*

**Reason for Selecting Strategies:**

- Funding constraints
- Influence of the housing market on HACP programs

*HACP deleted the following:*

- *Community priorities regarding housing assistance*
- *Results of consultation with local or state government*
- *Results of consultation with residents and the Resident Advisory Board*
- *Results of analysis for deconcentration and income mixing*

**Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions**

**Public Housing**

**Eligibility:**

Disabled family means a family whose head (including co-head), spouse or sole member is a person with a disability. *It may include two or more persons with disabilities living together, or one or more persons with disabilities living with one or more live-in aides.*

Elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 62 years of age. *It may include persons who are at least 62 years of age living together, or one or more persons who are at least 62 years of age living with one or more live-in aides.*

Near elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62, *living with one or more live-in aides.*



**B.1** *HACP added additional language to the paragraphs above.*

The Housing Authority requests criminal records from the following enforcement agencies for screening purposes:

- Local law enforcement agencies (*local sex offenders list*)
- State law enforcement agencies
- National Crime Check (*national sex offenders list*)

*HACP added additional language to bullet 1 and 3 above.*

**Maintaining Waiting List:**

*The Housing Authority of the City of Pueblo operates a site-based waiting list for Uplands.*

The Public Housing, one, *two*, three, four and five-bedroom waiting list are closed as of *April 30, 2022*. It is anticipated that this list may reopen during HACP's fiscal year *2022*.

**Deconcentration and Income Mixing:**

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

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

*The following covered developments have an average income that falls above or below the Established Income Range.*

Deconcentration Policy for Covered Developments			
Development Name:	Number of Units	Explanation (if any) [see step 4 at §903.2(c)(1)(iv)]	Deconcentration policy (if no explanation) [see step 5 at §903.2(c)(1)(v)]
<i>CO2-01 Sangre de Cristo</i>	<i>89</i>	<i>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.</i>	

B.1	CO2-08 Scattered		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	
	CO2-17 Scattered		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 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	
	CO2-23 Scattered		C. The Covered Development's size, location, and/or configuration promote income de-concentration, such as scattered site or small developments	
	CO2-25 Scattered		C. The Covered Development's size, location, and/or configuration promote income de-concentration, such as scattered site or small developments	

**Section 8**

**Eligibility:**

Disabled family means a family whose head (including co-head), spouse or sole member is a person with a disability. *It may include two or more persons with disabilities living together, or one or more persons with disabilities living with one or more live-in aides.*

Elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 62 years of age. *It may include persons who are at least 62 years of age*

**B.1** *living together, or one or more persons who are at least 62 years of age living with one or more live-in aides.*

Near elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62, *living with one or more live-in aides.*

*HACP added additional language to the paragraphs above.*

The Housing Authority requests criminal records from the following enforcement agencies for screening purposes:

- Local law enforcement agencies (local sex offenders list)
- State law enforcement agencies
- National Crime Check (*national sex offenders list*)

*HACP added additional language to bullet 3 above.*

**Waiting List Organization:**

The Section 8 waiting list is currently closed. The Housing Authority will reopen the waiting list as needed during FY 2023.

**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 2023 grants)</b>		
a) Public Housing Operating Fund	3,472,053.00	
b) Public Housing Capital Fund	2,045,588.00	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	10,662,000.00	
f) Resident Opportunity and Self-Sufficiency Grants	44,343.00	
g) Community Development Block Grant		
h) HOME		
Other Federal Grants (list below)		
Section 8 New Construction (MPT)	564,900.00	Operating Expenses
Farm Worker Housing (USDA)	66,150.00	Operating Expenses
Section 8 Moderate Rehabilitation	140,775.00	Operating Expenses & HAP's
<b>2. Prior Year Federal Grants (unobligated funds only) (list below)</b>		
CO 01P002501-20	478,372.00	Public housing capital improvements
CO 01P002501-21	1,097,241.00	Public housing capital improvements
<b>3. Public Housing Dwelling Rental Income</b>	<b>2,523,980.00</b>	<b>Public housing operations</b>
<b>4. Other income (list below)</b>		
Non-dwelling rent	44,217.00	Public housing operations
Interest on Investments	265.00	Public housing operations
Other Income: Legal fees, maintenance charges to tenants	138,265.00	Public housing operations
Late fees, NSF charges, etc.	17,560.00	Public housing operations
Non-dwelling rent	26,880.00	Public housing operations
Excess utilities, laundry commissions, vending machines, etc.	20,606.00	Public housing operations
<b>5. Non-federal sources (list below)</b>		
COCC Fee	102,250.00	Administration
Section 8 New Const. (MPT) Dwelling Rents	459,098.00	Operating Expenses
Farm Labor Dwelling Rents	45,218.00	Operating Expenses
Admin Fees	10,152.00	Operating Expenses
Interest Income on Mortgages	78,310.00	Operating Expenses
Interest Income & Other Income FLP, COCC	80.00	Operating Expenses
<b>Total resources</b>	<b>\$22,038,303.00</b>	

**B.1****Rent Determination****Income Based Rent Policies:****Rent Re-determinations*****HACP deleted the statement below:***

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

- Any time the family experiences a change in income

***HACP added the statement below:***

*Family circumstances may change between annual income reexaminations. HUD and PHA policies dictate what kinds of information about changes in family circumstances must be reported, and under what circumstances the PHA must process interim reexaminations to reflect those changes. HUD regulations also permit the PHA to conduct interim reexaminations of income or family composition at any time. When an interim reexamination is conducted, only those factors that have changed are verified and adjusted.*

*In addition to specifying what information the family must report, HUD regulations permit the family to request an interim determination if other aspects of the family's income or composition changes. The PHA must complete the interim reexamination within a reasonable time after the family's request. This part includes HUD and PHA policies describing what changes families are required to report, what changes families may choose to report, and how the PHA will process both PHA and family-initiated interim reexaminations.*

***Changes in Family and Household Composition***

*The family is required to report all changes in family composition. The PHA must adopt policies prescribing when and under what condition the family must report changes in income and family composition. However, due to family obligations under the program, the PHA has limited discretion in this area. The PHA will conduct interim reexaminations to account for any changes in household composition that occur between annual reexaminations.*

***Departure of a Family or Household Member***

*Families must promptly notify the PHA if any family member no longer lives in the unit. Because household members are considered when determining the family unit (voucher) size, the PHA also needs to know when any live-in aide, foster child, or foster adult ceases to reside in the unit.*

**B.1** *Changes Affecting Income or Expenses*

*Interim reexaminations can be scheduled either because the PHA has reason to believe that changes in income or expenses may have occurred, or because the family reports a change. When a family reports a change, the PHA may take different actions depending on whether the family reported the change voluntarily, or because it was required to do so.*

*PHA-Initiated Interim Reexaminations*

*PHA-initiated interim reexaminations are those that are scheduled based on circumstances or criteria defined by the PHA. They are not scheduled because of changes reported by the family.*

*The PHA will conduct interim reexaminations in each of the following instances:*

*For families receiving the Earned Income Disallowance (EID), the PHA will conduct an interim reexamination at the start and conclusion of the 24-month eligibility period.*

*If the family has reported zero income, the PHA will conduct an interim reexamination every 3 months as long as the family continues to report that they have no income.*

*If at the time of the annual reexamination, it is not feasible to anticipate a level of income for the next 12 months (e.g., seasonal or cyclic income), the PHA will schedule an interim reexamination to coincide with the end of the period for which it is feasible to project income. If at the time of the annual reexamination, tenant declarations were used on a provisional basis due to the lack of third-party verification, and third-party verification becomes available, the PHA will conduct an interim reexamination.*

*The PHA may conduct an interim reexamination at any time in order to correct an error in a previous reexamination, or to investigate a tenant fraud complaint.*

*Family-Initiated Interim Reexaminations*

*The PHA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's share of rent will change as a result of the increase. In all other cases, the PHA will note the information in the tenant file but will not conduct an interim reexamination.*

*Families are not required to report any other changes in income or expenses.*

*Optional Reporting*

*The family may request an interim reexamination any time the family has experienced a change in circumstances since the last determination. The PHA must process the request if the family reports a change that will result in a reduced family income.*

B.1

*If a family reports a decrease in income from the loss of welfare benefits due to fraud or noncompliance with a welfare agency requirement to participate in an economic self-sufficiency program, the family's share of the rent will not be reduced.*

*If a family reports a change that it was not required to report and that would result in an increase in the family share of the rent, the PHA will note the information in the tenant file but will not conduct an interim reexamination.*

*If a family reports a change that it was not required to report and that would result in a decrease in the family share of rent, the PHA will conduct an interim reexamination.*

### Operation and Management

#### HUD Programs Under PHA Management:

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	742	
Section 8 Vouchers	1265	
Section 8 Certificates	N/A	N/A
Section 8 Mod Rehab	15	
Special Purpose Section 8 Certificates/Vouchers (list individually)	VASH Vouchers – 61	
Other Federal Programs (list individually)		
Section 8 PBV	150	
Section 8 New Construction	131	
Low-Income Housing Tax Credit	354	
Section 202 Program	93	
U.S.D.A. Rural Development	N/A	N/A

#### Management and Maintenance Policies:

##### **Public Housing Management:**

- Admissions and Continued Occupancy Policy (ACOP)
- Grievance Procedures
- Termination and Eviction Policy
- Transfer and Transfer Waiting List Policy
- Financial Policies (12)
- Deconcentration and Income Targeting Policy
- Resident Initiatives Policy
- File Access Policy
- Pet Policy



B.1

- Records Retention Policy
- Security Policy
- Community Service Policy
- Enterprise Income Verification (EIV) Security Policy
- Maintenance Procedures Manual
- Preventive Maintenance Policies and Procedures
- Section 504 Reasonable Accommodation Policy and Procedure
- Section 504 Grievance Procedure
- Smoke Free Policy
- VAWA Policy
- Data Breach Policy
- *EIV Policy and Procedures*

*HACP added "EIV Policy and Procedures".*

### **Homeownership Programs**

#### **Section 8 Tenant Based Assistance:**

The HACP does administer a homeownership program for Section 8 *homeownership option to 26-50 participants (currently 30).*

### **Community Service and Self-Sufficiency Programs**

#### **Services and programs offered to residents and participants by the HACP:**

##### **Economic and Social Self-Sufficiency Programs:**

*The HACP does not coordinate, promote or provide any policies or programs for the enhancement of the economic and social self-sufficiency of assist families. HACP deleted the Neighborhood Network Center.*

##### **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: 06/24/2022)</b>
Public Housing	25	37
Section 8	0	22

#### **Community Service Implementation Report:**

- Number of tenants required to perform community service: 0
- Number of tenants performing community service: 0



B.1

- Number of tenants granted exemptions: 0
- Number of tenants in non-compliance: 0
- Number of tenants terminated/evicted due to non-compliance: 0

## Safety and Crime Prevention

### Need for measures to ensure the safety of public housing residents:

*Developments that are most affected: HACP deleted AMP 100 Sangre De Cristo Apartments and added all developments.*

### Crime and Drug Prevention activities the HACP has undertaken or plans to undertake in the next HACP fiscal year:

List of crime prevention activities:

- Crime Prevention Through Environmental Design
- Activities targeted to at-risk youth, adults or seniors
- Hiring a security service for security during evening hours
- Halloween Glow Stick Program
- Improved lighting

*PHA deleted*

- *Annual Kids Safety Fair*

Developments that are most affected:

- *All developments*

*PHA deleted AMP 100 Sangre De Cristo Apartments and added all developments.*

### Coordination between HACP and the police:

*HACP deleted the following:*

*Description of the coordination between the PHA and the appropriate police precincts for carry out crime prevention measures and activities:*

- *Police provide crime data to housing authority staff for analysis and action*
- *Police have established a physical presence on housing authority property (e.g., community policing office, officer in residence)*
- *Police regularly meet with the PHA management and residents*

*Developments that are most affected:*

- *All developments*

**B.1 Pet Policy**

The description of the HACP's Pet Policy follows:

All residents are permitted to own and keep common domesticated household pets. Common household pet means a domesticated cat, dog, bird, gerbil, hamster, Guinea pig, and fish in aquariums. *HACP may place prohibitions on types of pets it classifies as dangerous, provided that such classifications are consistent with applicable State and local law.*

Pet owners must agree to abide by the HACP's Pet Ownership Rules.

\$25.00 separate Pet Waste Removal Charge for each occurrence of pet owner's failure to remove pet waste.

All pets must be registered with the HACP and provide proof of license, inoculation, and a copy of veterinarian's records noting the date the pet was spayed or neutered.

*Service/Assistance Animals must comply with all local animal control or public health requirements; therefore, you may require in your Service/Assistance Policy that all such animals are subject to HACP vaccination, licensing, registration and spayed/neutered requirements.*

Updated photograph of pet required to be submitted to HACP at annual registration.

At certain developments HACP will furnish pet sticker to resident to be placed on the front door or front window of the unit. Pet sticker will be valid for one year. Replacement sticker will be provided for a \$5.00 charge.

\$25.00 charge will be assessed if the resident has registered a pet and does not display the pet sticker accordingly.

Limit of one pet per household.

Limit for birds is two (2).

Pet owner may have only a small cat or a small dog. Limitations: weight not to exceed fifteen (15) pounds; height shall not exceed twelve (12) inches. **This does not apply to service animals that assist persons with disabilities.**

Pet owner shall license their pet as required by law.

Pet owner must not violate any state or local health or humane laws.

Pet must be spayed or neutered.

Pet must be maintained on leash and kept under control when taken outside the unit.

### PET OWNERSHIP FEES AND PET DEPOSITS

Refundable Pet Deposit \$300.00

Aquariums

Refundable Deposit \$ 50.00

Payment of Pet Fees and Pet Deposits

The resident will be required to pay the pet fee and pet deposit in full at the time the pet is registered with the Housing Authority, unless other arrangements are agreed upon by the Project Manager.

(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, 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

**B.2 Mixed Finance Modernization or Development**

The PHA may be engaging in 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/CO0020000400</b>	
2. Activity type: Demolition <input type="checkbox"/>	
Disposition <input checked="" type="checkbox"/>	
3. Application status (select one)	
Approved <input type="checkbox"/>	
Submitted, pending approval <input type="checkbox"/>	
<b>Planned application</b> <input checked="" type="checkbox"/>	
4. Date application approved, submitted, or <i>planned</i> for submission: <b>January 2023</b>	
5. Number of units affected: <b>73</b>	
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, 2023</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 *was completed in 2021 which converted 47 units*. 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 *November 2024*.

**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: 134

General location(s) (eligible census tracts or area within eligible census tracts):

Fenix, Central Grade, Palo Verde, Ashwood Apartments, *and Mountain View.*

How is this action consistent with the HACP Plan? Include the reasons why project basing instead of tenant basing the same number of units is appropriate.

Rehabilitation of substandard housing and development of additional affordable housing.

B.2	The HACP continues to research other projects that would enhance or increase the affordable housing inventory through the use of Project Based Voucher assistance.
B.3	<p><b>Progress Report.</b> 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>HACP GOAL #1: EXPAND THE SUPPLY OF ASSISTED HOUSING</b></p> <p>HACP 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><i>Progress Statement:</i></b> <i>The Housing Authority of the City of Pueblo continues to partner with the Fenix Historic Investments by providing project-based vouchers for 52 units and partnering with Health Solutions by providing 10 project-based vouchers and 10 VASH project-based vouchers.</i></p> <p><i>The Housing Authority of the City of Pueblo has completed the second phase of the RAD project. The Mountainview Townhomes which consisted of 47 Low Income Housing Tax Credit (LIHTC)/Project-based voucher and 4 LIHTC were fully housed in September 2022.</i></p> <p><b>HACP GOAL #2: IMPROVE THE QUALITY OF ASSISTED HOUSING</b></p> <p>HACP 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> <p><b><i>Progress Statement:</i></b> <i>The Housing Authority of the City of Pueblo (HACP) is currently in the progress of the third phase of the Sangre de Cristo RAD conversion. The Crawford Townhomes which will consist of 49 units are scheduled for construction to begin August 2022 and projected to be completed by October 2023.</i></p> <p><i>HACP has implemented a “Professional Development” program. This program will enable employees to set aside time twice a month to dedicate to further training on regulations, policies, and procedures. This will ensure that all programs are managed efficiently and effectively.</i></p>

**B.3 HACP GOAL #3: INCREASE ASSISTED HOUSING CHOICES**

HACP established the following objectives to strive in meeting goal #3

- Conduct outreach efforts to potential voucher landlords
- Increase voucher payment standards
- Implement voucher homeownership program

***Progress Statement:*** *The Housing Authority of the City of Pueblo (HACP) continues to use the Small Area Fair Market Rents (SAFMR). As landlords continue to request rent increases, HACP has also been able to increase the payment standard at or below 90% and 110% of the current SAFMR.*

*The Housing Authority of the City of Pueblo has increased its Voucher Homeownership Program from 28 to 33 tenants.*

**HACP GOAL #4: PROVIDE AN IMPROVED LIVING ENVIRONMENT**

HACP established the following objectives to strive in meeting goal #4

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

***Progress Statement:*** *The Housing Authority of the City of Pueblo continues to contract security services for many developments. Continues to provide better lighting in apartment complexes as well the newly constructed townhomes to enhance security around the property.*

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

HACP established the following objectives to strive in meeting goal #5

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

***Progress Statement:*** *The Housing Authority of the City of Pueblo's outreach efforts has increased its enrollment of the family self-sufficiency program to 59 participants.*

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

HACP established the following objectives to strive in meeting goal #6

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

B.3	<ul style="list-style-type: none"> <li>Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required</li> </ul> <p><b>Progress Statement:</b> <i>Continue education of the HACP staff to ensure all necessary measures are taken and action plan is adhered to.</i></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) in EPIC and the date that it was approved.</p> <p><i>See Capital Fund 5 Year Action Plan in EPIC approved by HUD on / /</i></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 type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C.	<p><b>Other Document and/or Certification Requirements.</b></p>
C.1	<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 type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. <i>(See attachment co002a01)</i></p>
C.2	<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, must be submitted by the PHA as an electronic attachment to the PHA Plan.</i></p>



C.3	<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>Form HUD-50077-ST-HCV-HP, <i>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.</p>
C.4	<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>
<p><b>D. 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>

**D.1**

**Strategies:**

- Increase the stock of affordable, accessible rental housing.
- Expand the use of PBVs by utilizing the Section 18 repositioning.

**Action to achieve goal:**

- 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.
- 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.

**Strategies:**

- Increase access to affordable housing.

**Action to achieve goal:**

- HACP implemented a homeless preference for all HUD subsidized waiting lists and will be implementing a working preference for all HUD subsidized waiting lists.
- Maintain housing that is designated for elderly occupants. Apply for special purpose voucher targeted to the elderly, should they become available.
- Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing.

**Strategies:**

- Increase support and services for residents of publicly supported housing and maintain and improve the quality and management of publicly supported housing.

**Action to achieve goal:**

- HACP will partner with supportive agencies and non-profits to provide support to residents (counseling, childcare, transportation).
- Annually gather feedback from residents on the quality of management of publicly supported housing units and/or landlord related issues.
- HACP will routinely disseminates information to its residents regarding employment and support services.
- HACP routinely disseminates fair housing information to residents.
- HACP staff to attend Fair Housing training, seminars and webinars.

**Attachment: co002a01**  
**Housing Authority of the City of Pueblo**  
**Resident Advisory Board Consultation Process and Comments – FYB 2023**

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

**Please provide date**

2. Resident Advisory Board Selection

Selection made from resident/participant response **Please provide date**

3. Meeting Organization

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

**Please provide date**

Notify Resident Advisory Board of scheduled meeting **Please provide date**

Hold Resident Advisory Board meeting **Please provide date**

4. Notification of Public Hearing

Schedule date for Public Hearing and place ad **Please provide date**

Notify Resident Advisory Board **Please provide date**

Hold Public Hearing meeting **Please provide date**

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

**Please provide the residents' recommendations/comments and the PHA response to each comment after each RAB meeting.**

**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	RAD PBRA	48	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

***Based on the comprehensive assessment recommendations and findings, HACP will submit a Section 18 application 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 pursue the preservation 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.***