

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

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

Definitions.

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

A.	PHA Information.																																				
A.1	<p> PHA Name: <u>New Rochelle Municipal Housing Authority (NRMHA)</u> PHA Code: <u>NY088</u> PHA Type: <input type="checkbox"/> Standard PHA <input checked="" type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/01/2021</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units: <u>100 (Peter Bracey); Project-Based Vouchers 203 includes 91 (La Rochelle Place) and 112 (Queen City); Number of Housing Choice Vouchers (HCVs): 397</u> Total Combined Units/Vouchers <u>700.</u> </p> <p> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 15%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 25%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 15%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</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> <tr> <td> </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	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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B. Annual Plan Elements

B.1 Revision of 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 (**SEE BELOW**)
- 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 (**SEE BELOW**)

(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 the Housing Needs: Although the NRMHA has not revised its Statement of Housing Needs or strategies for addressing the needs of families who reside in the jurisdiction served by the Authority to include (elderly families, families with disabilities, and households by ethnicity, the information is being provided at HUD request with the FY2021 Annual Plan submission as the Agency is under a Recovery Agreement.

The Quantifiable Goals and Objectives that will address the needs of the targeted families throughout the FY 2021 Annual Plan and were covered in the HUD-approved Five-Year Plan (FY 2020-2024) were derived from a review of the Approved 2018-2022 Consolidated Plan and the FY 2020 Action Plan for the City of New Rochelle. The strategies assessed by the NRMHA are consistent and inclusive with the City’s. More specifically the FY 2020 Action Plan lists the following priorities as pertains to affordable housing initiatives:

- ✓ Maintain a Tenant Based Rental Assistance program targeting the homeless population;
- ✓ Affordable housing preservation and Housing Choice Assistance Payments – Public Housing Capital Fund program and Housing Choice Voucher program;
- ✓ Improve access to and quality of housing by providing counsel to the New Rochelle Municipal Housing Authority during each of their fiscal year’s Annual Planning process to help their planning for preserving and improving their public housing inventory;
- ✓ Preserve public housing inventory as the City’s aging public housing inventory owned by the New Rochelle Municipal Housing Authority provides affordable rental housing to very low-income persons and requires annual capital improvements to preserve the condition of the housing units;
- ✓ Operate the Housing Choice Voucher (HCV) Program to improve quality of life by continuing to offer mobility counseling to new HCV holders and those actively looking for affordable units in New Rochelle or looking to relocate to a high opportunity area.

Page 26: “ Despite City and Westchester County efforts, there remain a number of significant obstacles to meeting the needs of the underserved. These obstacles include the following:

- Population growth in over stressed areas
- Aging population
- High cost of housing
- Aging housing stock
- Inadequate funding to rehabilitate all of the existing housing units in need of repair, and
- Lack of appropriate institutions and staff to address needs identified in Consolidated Plan caused by lack of funds or non-existence of appropriate non-profit organization.”

Page 53: “During 2020, the City will continue to support the efforts of the New Rochelle Municipal Housing Authority (NRMHA) to improve the condition of public housing units and the quality of life of public housing residents.....The City is working with NRMHA and HUD to insure continuing progress toward meeting Recovery Agreement milestones. To accomplish this, city staff and officials have regular communications and meetings with NRMHA representatives.....The waiting lists for NRMHA housing programs demonstrate an unmet affordable housing need that disproportionately affects members of the fair housing protected classes and low-income households.” The NRMHA has reaffirmed a commitment to the previous goals and objectives established in the 2020-2024 Five Year Plan as a priority for FY 2021 as they that are congruent with HUD priority goals . These goals are as follows:

- ✓ Expand the supply of assisted housing
- ✓ Improve the quality of assisted housing
- ✓ Increase assisted housing choices
- ✓ Provide an improved living environment
- ✓ Promote Self-Sufficiency and asset development of assisted households
- ✓ Ensure Equal opportunity and affirmatively further fair housing
- ✓

The waiting lists for NRMHA housing programs demonstrate an unmet affordable housing need. The Housing Choice Voucher (HCV)/Section 8 Program and the Low-Income Public Housing (LIPH) waiting lists are closed. There is a separate waitlist for the RAD Development (PRC Queen City) which is open.

The waitlists as of March 1, 2021 are included as Attachment B.1. [SEE ATTACHED](#)

Operation and Management: Based on the HUD final rule issued March 8, 2015 “Streamlining Administrative Regulations for Public Housing, Housing Choice Voucher, Multifamily Housing and Community Planning and Development Programs”, the NRMHA is still considering options to reduce administrative burden and enable more efficient use of scarce resources through reviewing and revising as applicable, the following:

- Rent determination processes, verification of Social Security numbers for children of applicants, verification of assets and community service completion and grievance procedures.
- The NRMHA is in the process of revising the LIPH Admissions and Continued Occupancy Plan (ACOP) and the HCV Administrative Plan based on mandated updates from HUD and in areas conducive for more effective administration. The Plans were last Board approved in July 2017 but will be reviewed and updated in FY 2019 to be effective on July 1, 2020 for FY 2020.
- The NRMHA has reviewed its goals and objectives for the Violence Against Women Act (VAWA) as it provides protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are not only available to women but are available equally to all individuals regardless of sex, gender identity, or sexual orientation. The NRMHA revised its Violence Against Women Act (VAWA) policies and procedures to ensure compliance with the most recent regulations in FY 2018. On November 16, 2016, HUD published the final rule regarding VAWA. This final rule included direction regarding information that must be shared with new and existing residents. This rule also provided direction regarding information to be shared with any household facing eviction.
- Lastly, the NRMHA has taken the following steps to ensure compliance with the final rule providing guidance requiring PHA's to create an Emergency Transfer Plan as well as forms to support the plan.
 1. Resident were sent via first class mail, the HUD 5380 “Notice of Occupancy Rights under the Violence against Women Act” and the HUD 5382 “Victim Certification Form”.
 2. HUD 5380 "Notice of Occupancy Rights under the Violence against Women Act" document are given to each household at move-in.
 3. Termination postings must include the HUD 5380 "Notice of Occupancy Rights under the Violence against Women Act".

4. The NRMHA has begun using the HUD 5382 VAWA and the HUD 5383 VAWA forms for all requests for emergency transfers relating to VAWA.

Substantial Amendment/Modification: A substantial amendment is any statutory or regulatory change that materially changes Board Approved Policies. In August 2016, the NRMHA forwarded to HUD a Significant Amendment-RAD Conversion which was not approved until the FY2018 Annual Plan. However, the RAD conversion was not approved for Peter Bracey in March 2019 (FY 2018) and may submit a RAD, Section 18 Demo/Dispo, or Voluntary Conversion Application in FY 2021.

It is not a Significant Modification to the (FY 2020-2024) Five-Year Plan or FY 2021 Annual Plan for the NRMHA to pursue a RAD, Section 18 Demo/Dispo, or a Voluntary Conversion Application for Peter Bracey Apartments. Even though a previous RAD application was denied, in the FY 2019 HUD approved Annual Plan it was stated the NRMHA would consider some type of conversion activity for Peter Bracey Apartments.

However, as the NRMHA is under a Recovery Agreement, the significant amendment/modification will again be submitted with the FY 2021 Annual Plan to include the Statement of Significant Amendment Attachment B.1 (b) and RAD/Section 18 Demo/Dispo or Voluntary Conversion Information as Attachment B.2. The NRMHA redefined its definition of Substantial Deviation in FY 2018 to exclude the following items:

1. The decision to convert to either Project-Based Rental Assistance or Project-Based Voucher Assistance:
 - Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds.
 - Changes to the construction and rehabilitation plan for each approved RAD conversion; and
 - Changes to the financing structure for each approved RAD conversion.

The Housing Authority plans to seek to revitalize Bracey Apartments either through RAD, Voluntary Conversion or Section 18 Demo/Dispo application. The City of New Rochelle allocated an additional 200 units to the Authority for redevelopment of Bracey Apartments under the overlay zone.

(c) The PHA must submit its Deconcentration Policy for Field Office review.

Exemption for Deconcentration of Poverty Policy: As per 24CFR 903.2(6) " Applicability of Deconcentration of Poverty and Income Mixing Requirements ", the NRMHA is " not subject to deconcentration of poverty and income mixing requirements because it has only one (1) general occupancy, family housing development"

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 (Section 18).
- 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 Plan.

Four (4) elements were checked yes to include the following: Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing to Project-Based Assistance under RAD and Occupancy of Over-Income Families.

	<p><u>Mixed Finance Modernization or Development:</u> As a component of the RAD, Section 18/Demo/Dispo or Voluntary conversion of NY088003, the NRMHA may undertake mixed-finance modernization or development of the Peter Bracey property. Although the NRMHA decided to withdraw the RAD CHAP award for NY088003 (Peter Bracey Apartments) at the monthly Board Meeting held April 3, 2017, mixed-finance, to include RAD and/or other Modernization and Development options may still be pursued. The NRMHA may commit and utilize Capital Funds in excess of \$100,000 for the RAD, Section 18, or other Voluntary Conversion options for the redevelopment process. If CFP funds are utilized for the referenced activities, the NRMHA will notify HUD of the exact amounts of fund committal for approval.</p> <p><u>Demolition and/or Disposition:</u> The NRMHA engaged in Section 18 Demolition and Disposition activities at NY088004 (Heritage Homes) and may seek Section 18 approval, of the disposition of NY088003 (Peter Bracey Apartments).</p> <p><u>Conversion of Public Housing to Project-Based Assistance under RAD:</u> As previously stated, although the NRMHA received a CHAP Award for NY088001 and NY088003, at the monthly Board Meeting held April 3, 2017, the NRMHA decided to withdraw its RAD CHAP Award in with connection with Peter Bracey Apartments, PIC Development # NY088003. NRMHA reapplied to HUD’s RAD program for NY088003 (Peter Bracey Apartments) and received notification in March 2019 it would not be awarded at this time. The NRMHA will consider reapplying at a later date.</p> <p><u>Occupancy by Over-Income Families:</u> The NRMHA has twelve (18) over-income households (8 in Bracey) 7 RAD, 3 HCV). The Housing Authority believes these households definitely contribute to a positive socio-economic environment in the developments they reside in and therefore, desires for them to remain as eligible households.</p> <ol style="list-style-type: none"> 1) SEE ATTACHMENT B.2 for Narrative and Chart of Projected RAD activities to include the language pertaining to the unit reduction of the de minimis rule in the RAD Application. The NRMHA may reapply in FY 2021 for Peter Bracey Apartments. 2) The RAD, Section 18 Demo/Dispo or any other Voluntary Conversions will not include any de minimis reductions,
<p>B.3</p>	<p>Civil Rights Certification.</p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. (Attachment B.3)</p>
<p>B.4</p>	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(a) If yes, please describe: (ATTACHMENT B.4) The audit report for FYE 06/30/19 is attached. The Authority is in the process of completing the FYE 6/30/20 Audit. Please note that the Authority submitted a waiver request for submission of the FYE 6/30/20 audit.</p>
<p>B.5</p>	<p>Progress Report.</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>The Executive Director has demonstrated a renewed commitment to restore the NRMHA to a viable, high performing Agency. Through the maximization of resources, the NRMHA is continuing to demonstrate significant progress in meeting the mission and goals identified in the FY 2020-2024 Five-Year Plan, FY 2020 Annual Plan, and the Recovery Agreement. The only tasks remaining in the Recovery Agreement are related to the Financial Components and the NRMHA is requesting HUD assistance with identifying an individual knowledgeable of the PHA arena to assist with the recovery efforts. All strategies in FY 2021 are consistent with the FY 2020-2024 Five-Year Plan as they are a continuation of efforts and identified objectives .</p>

	<p>More specifically, all activities in FY 2021 will be directed towards continued improvement of all management systems, procedures, and the administrative structure of the Agency.</p> <p>The NRMHA will continue to strive toward addressing the needs of the residents through promoted participation, continued involvement and operating in an environment of transparency. The Resident Advisory Board (RAB) is constructed and there are thirteen (13) committed residents who serve on the RAB. See Attachment B.6 (a) for the current listing (2021) RAB members.</p> <p>Although planned Conversion Activities were addressed in the FY 2019 Annual Plan, a summary of the projected planned resubmission for Peter Bracey RAD conversion is included in the FY 2021 Plan. See Attachment B.2.</p> <p>The NRMHA held the required public hearing on Friday, April 2, 2021. A copy of the sign-in sheet and comments are included as B.5.</p>
<p>B.6</p>	<p>Resident Advisory Board (RAB) Comments. The FY 2021 RAB list is included as B.6 (a) The FY 2021 RAB Comments are included as B.6 (b)</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan? The NRMHA had a public hearing and also received comments from the Resident Advisory Board (RAB) on the FY 2021 Plan. All comments are attached.</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.</p>
<p>B.7</p>	<p>Certification by State or Local Officials. (Attachment B.7) Form HUD 50077-SL, <i>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.</p>
<p>B.8</p>	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>SEE ATTACHMENT B.8 (Most Recent Action Plan)</p>
<p>C.</p>	<p>Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
<p>C.1</p>	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>The most recent approved 5-Year Action Plan (HUD-50075.2) was approved by HUD in EPIC in FY 2020. FY 2021 was included in the Five-Year Plan (50075.2) with that submission. The NRMHA resubmitted the Action Plan in EPIC covering FY 2019-2023 after receiving technical assistance from HUD as the grant amounts were decreased based on a reduction of units in PIC.</p>