

HOUSING AUTHORITY OF THE COUNTY OF MARIN

FY2021 – FY2026 FIVE-YEAR AGENCY PLAN

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A. To Be Attached – Public RAB Comments
- Civil Rights Certification.

B. PHA Information

A.1 PHA Name: Housing Authority of the County of Marin

PHA Code: CA052

PHA Type: Standard PHA

PHA Plan for Fiscal Year Beginning: 01/2021 – **(COVID CARES WAIVER)**

Public Housing Units: 496

Housing Choice Vouchers: 2187

Total Combined Units/Vouchers: XXXX

PHA Plan Submission Type: 5 Year Agency Plan

Availability of Information

Marin Housing’s FY2021 - FY2026 Five-Year Agency Plan will be displayed for public review at the following locations:

- (1) Main Administrative Office located at 4020 Civic Center Drive in San Rafael, California.
- (2) Golden Gate Village development office located at 429 Drake Ave Marin City.
- (3) PHA website www.marinhousing.org

Supporting documents for the FY2021 – FY2026 Five-Year Agency Plan are available for inspection at the Main Administrative Office located at 4020 Civic Center Drive., San Rafael, CA .

Introduction

Established in 1942, the Housing Authority of the County of Marin provides affordable housing and related services to low and moderate income citizens of Marin County, California. The agency currently provides assistance to over 4,000 families throughout the county in effort to fulfill the goal to assist low and moderate income residents of Marin County to secure and maintain high quality affordable housing. The Authority is dedicated to strengthening communities and improving the lives of Marin County citizens focusing on the ownership, management, sustainability and preservation of affordable housing.

The Authority's two main programs include the Public Housing and Housing Choice Voucher Programs. Marin Housing also operates other smaller housing programs such as Mainstream Housing, Housing Opportunities for Persons with AIDS, Supportive Housing, Rental Allowance and Partnership Rental Housing.

Public Housing

Public Housing was established to provide decent and safe rental housing for eligible families, the elderly, and persons with disabilities. Public housing comes in all sizes and types, from scattered single-family houses to high-rise apartments.

There are approximately 1.3 million households living in public housing units, managed by some 3,300 Housing Authorities in the United States. The U.S. Department of Housing and Urban Development (HUD) administers Federal aid to local housing agencies that manage the housing for residents at rents they can afford. HUD furnishes technical and professional assistance in planning, developing and managing these developments.

Admission to and continued occupancy is based on several factors which are established by the U.S. Department of Housing and Urban Development and followed by Marin Housing. This Agency Plan includes information concerning those requirements. Additional information is available by visiting the Agency's website or contacting the main office.

Currently, Marin Housing operates 496 units located in six (6) developments. Those developments are:

Golden Gate Village (Marin City) – 296 units open for occupancy to families

Venetia Oaks (San Rafael) – 36 units open for occupancy to elderly and/or disabled persons

Homestead Terrace (Mill Valley) – 28 units open for occupancy to elderly and/or disabled persons

Casa Nova (Novato) – 40 units open for occupancy to elderly and/or disabled persons

Golden Hinde (San Rafael) – 40 units open for occupancy to elderly and/or disabled persons

Kruger Pines (Mill Valley) – 56 units open for occupancy to elderly and/or disabled persons

Housing Choice Voucher

The Housing Choice Voucher Program provides rental assistance to help low income persons afford decent and safe rental housing. The Program is funded by HUD.

Initial eligibility and continued participation is based on a number of factors which are established by the HUD and followed by Marin Housing. This Agency Plan includes information concerning those requirements. Additional information is available by visiting the Agency's website or contacting the main office.

A family participating in the Housing Choice Voucher Program is issued a rental voucher which allows them to locate a dwelling unit suitable to their needs in the private rental market. Once a unit is selected, Marin Housing inspects the unit before initial leasing and at least annually thereafter to ensure that the unit meets Housing Quality Standards (HQS) established by HUD. Once the unit passes the HQS inspection, Marin Housing will enter into a Housing Assistance Payment (HAP) Contract with the Owner leasing the unit to the family. Thereafter, Marin Housing pays a portion of the rent, the HAP, to the owner on behalf of the family.

Under the Housing Choice Voucher Program, a family is generally required by regulation to pay approximately 30% of adjusted monthly income toward rent and utilities.

Mainstream Housing Voucher

This program supplements the Housing Choice Voucher Program by focusing on providing affordable housing to persons with disabilities. The Mainstream Housing Program eligibility requirements and operations mirror the Housing Choice Voucher exactly, except that applicants must include one or more non-elderly persons with disabilities.

Housing Opportunities for Persons with AIDS (HOPWA)

This program has been extremely successful in allowing persons struggling with AIDS/HIV to find stable and suitable rental housing, and then be allowed to focus on improved or stabilized health, services and/or employment. This program is available to persons identified by the county health department, whose head of household or spouse are diagnosed with AIDS/HIV, and are on the verge of becoming, or are, homeless.

C. Annual Plan Elements

B.1 Revision of PHA Plan Elements

Statement of Housing Needs and Strategy for Addressing Housing Needs

Housing Needs of Families in the Jurisdiction/s Served by the PHA

Based upon the information contained in the County Consolidated Plan applicable to the jurisdiction, and/or other data available to the PHA, provide a statement of the housing needs in the jurisdiction by completing the following table. In the “Overall” Needs column, provide the estimated number of renter families that have housing needs. For the remaining characteristics, rate the impact of that factor on the housing needs for each family type, from 1 to 5, with 1 being “no impact” and 5 being “severe impact.” Use N/A to indicate that no information is available upon which the PHA can make this assessment.

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	6,544	5	5	5	3	4	4
Income >30% but <=50% of AMI	3,240	4	4	4	3	3	3
Income >50% but <80% of AMI	1,529	3	3	3	3	2	3
Elderly	4,375	3	3	3	4	2	3
Families with Disabilities		3	4	4	5	4	4
White	24,887	3	3	3	3	3	3
Black	1,024	3	3	3	3	3	3
Hispanic	6,437	3	3	3	3	3	3
American Indian/Alaska Native	75	3	3	3	3	3	3
Pacific Islander	40	3	3	3	3	3	3
Asian	1,307	3	3	3	3	3	3

What sources of information did the PHA use to conduct this analysis? (Check all that apply; all materials must be made available for public inspection.)

- Consolidated Plan of the Jurisdiction/s
Indicate year: FY2021-FY2026
- U.S. Census data: the Comprehensive Housing Affordability Strategy (“CHAS”) dataset (2007-2011)
- American Housing Survey data
Indicate year:
- Other housing market study
Indicate year:
- Other sources: (list and indicate year of information)

Housing Needs of Families on the Housing Choice Voucher Waiting List			
	# of families	% of total families	Average Days Waiting
Waiting list total			
Extremely low income (<=30% AMI)			
Very low income (>30% but <=50% AMI)			
Low income (>50% but <80% AMI)			
Income Information Not Available			
Families with children			
Elderly families			
Families with Disabilities			
White			
African American			
Amer. Indian/Alaskan Native			
Asian			
Native Hawaiian/Other Pacific Islander			
Race Information Not Available			
<p>Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes</p> <p>If yes: How long has it been closed (# of months)? Closed Since 2008 months as of 12/1/2020</p> <p>Does the PHA expect to reopen the list in the PHA Plan year? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes</p> <p>Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes (Involuntary Displacement)</p>			

Housing Needs of Families on the Public Housing Waiting List			
	# of families	% of total families	Average Days Waiting
Waiting list total	217		
Extremely low income <=30% AMI	197	89.9%	
Very low income (>30% but <=50% AMI)	3	1.4%	
Low income (>50% but <80% AMI)	14	7.8%	
Income Information Not Available	3	.9%	
Families with children	46	21.2%	
Elderly families	35	16.1%	
Families with Disabilities	91	41.9%	
White	128	59%	
African American	51	23.5%	
American Indian/Alaska Native	8	1.4%	
Asian	20	9.2%	
Native Hawaiian/Other Pacific Islander	0	0%	
Race Information Not Available	10	4.6%	
Characteristics by Bedroom Size (Public Housing Only)			
0 BR	291	27.6%	
1 BR	282	26.8%	
2 BR	366	34.8%	
3 BR	92	8.7%	
4 BR	22	2.1%	
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			
If yes:			
How long has it been closed (# of months)? 12 months as of 12/1/2020			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes (Involuntary Displacement)			

Strategy for Addressing Housing Needs

Strategies

Need: Shortage of affordable housing for all eligible populations

Strategy 1: Maximize the number of affordable units available to the PHA within its current resources by:

- Employ effective maintenance and management policies to minimize the number of public housing units off-line
- Reduce turnover time for vacated public housing units
- Reduce time to renovate public housing units
- Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required
- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration

Strategy 2: Increase the number of affordable housing units by:

- Apply for additional section 8 units should they become available
- Leverage affordable housing resources in the community throughout Marin county leading to creation of mixed - finance housing
- Pursue housing resources other than public housing or Section 8 tenant-based assistance.

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

Strategy 1: Target available assistance to families at or below 30 % of AMI

- Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing
- Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance

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

Strategy 1: Target available assistance to families at or below 50% of AMI

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

Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

- Maintain housing that is designated for elderly occupants.

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

- Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing
- Affirmatively market to local non-profit agencies that assist families with disabilities.

Need: Specific Family Types: Races or ethnicities with disproportionate housing needs

Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:

- Marin Housing will seek to identify additional underserved populations.

Strategy 2: Conduct activities to affirmatively further fair housing

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

Reasons for Selecting Strategies

- Funding constraints
- Staffing constraints
- Influence of the housing market on PHA programs

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

The Housing Authority of the County of Marin manages 496 public housing units and 2,187 housing choice vouchers. While both programs are operated under the same general eligibility, selection, and admissions requirements, each program has a separate document which covers all of these policies in detail. The Admissions and Occupancy Policy (ACOP) covers all eligibility, selection, and admissions policies for the Public Housing Program while the Administrative Plan covers these policies for the Housing Choice Voucher Program.

Some of the major items covered in each document are provided on the following pages.

Public Housing

Eligibility

The PHA is responsible for ensuring that every individual and family admitted to the public housing program meets all program eligibility requirements. This includes any individual approved to join the family after the family has been admitted to the program. The family must provide any information needed by the PHA to confirm eligibility and

determine the level of the family's assistance. To be eligible for the public housing program the applicant family must:

- Qualify as a family as defined by HUD and the PHA.
- Have income at or below HUD-specified income limits.
- Qualify based on citizenship or the eligible immigrant status of family members.
- Provide social security number information for family members as required.
- Consent to the PHA's collection and use of family information as provided for in PHA-provided consent forms.

The PHA must also determine that the current or past behavior of household members does not include activities that are prohibited by HUD or the PHA.

Family

To be eligible for admission, an applicant must qualify as a family. A family may be a single person or a group of persons. Family as defined by HUD includes a family with a child or children, two or more elderly or disabled persons living together, one or more elderly or disabled persons living with one or more live-in aides or a single person. The PHA has the discretion to determine if any other group of persons qualifies as a family.

MHA Policy - A family also includes two or more individuals who are not related by blood, marriage, adoption or other operation of law, but who either can demonstrate that they have lived together previously or certify that each individual's income and other resources will be available to meet the needs of the family. Each family must identify the individuals to be included in the family at the time of application and must update this information if the family's composition changes.

Income Limits

HUD is required by law to set income limits that determine the eligibility of applicants for HUD's assisted housing programs, including the public housing program. The income limits are published annually and are based on HUD estimates of median family income in a particular area or county, with adjustments for family size.

Types of Low-Income Families [24 CFR 5.603(b)]

Low-income family. A family whose annual income does not exceed 80 percent of the median income for the area adjusted for family size.

Very low-income family. A family whose annual income does not exceed 50 percent of the median income for the area adjusted for family size.

Extremely low-income family. A family whose annual income does not exceed 30 percent of the median income for the area, adjusted for family size.

HUD may establish income ceilings higher or lower than 30, 50, or 80 percent of the median income for an area if HUD finds that such variations are necessary because of unusually high or low family incomes.

Using Income Limits for Eligibility [24 CFR 960.201]

Income limits are used for eligibility only at admission. Eligibility is established by comparing a family's annual income with HUD's published income limit. To be income-eligible, a family must be a low-income family.

Citizenship or Eligible Immigration Status

Housing assistance is available only to individuals who are U.S. citizens, U.S. nationals (herein referenced to as citizens and nationals), or noncitizens that have eligible immigration status. At least one family member must be a citizen, national, or noncitizen with eligible immigration status for the family to qualify for any level of assistance.

All applicant families must be notified of the requirement to submit evidence of their citizenship status when they apply. Where feasible, and in accordance with the PHA's Limited English Proficiency Plan, the notice must be in a language that is understood by the individual if the individual is not proficient in English.

Social Security Numbers

The applicant and all members of the applicant's household must disclose the complete and accurate social security number (SSN) assigned to each household member, and the documentation necessary to verify each SSN.

In addition, each participant who has not previously disclosed an SSN, has previously disclosed an SSN that HUD or the SSA determined was invalid, or has been issued a new SSN must submit their complete and accurate SSN and the documentation required to verify the SSN at the time of the next interim or annual reexamination or recertification.

Participants age 62 or older as of January 31, 2010, whose determination of eligibility was begun before January 31, 2010, are exempt from this requirement and remain exempt even if they move to a new assisted unit.

The PHA must deny assistance to an applicant family if they do not meet the SSN disclosure and documentation requirements contained in 24 CFR 5.216.

Family Consent to Release of Information

HUD requires each adult family member, and the head of household, spouse, or co-head, regardless of age, to sign form HUD-9886, Authorization for the Release of Information/

Privacy Act Notice, and other consent forms as needed to collect information relevant to the family's eligibility and level of assistance.

The PHA must deny admission to the program if any member of the applicant family fails to sign and submit consent forms which allow the PHA to obtain information that the PHA has determined is necessary in administration of the public housing program [24 CFR 960.259(a) and (b)].

Eligibility Requirements

- Participants must have a HCV Rental Voucher for at least one year; with no debts owed to MHA or other PHA
- The Head of Household or Responsible Adult must be employed for minimum of one year at 30 hours per week unless Elderly/Disabled
- Participants must be first-time homebuyer
- Participants must participate in HUD-certified Homeownership Counseling Course. Courses are listed on MHA's website.

Denial of Admission

PHAs are required to establish standards that prohibit admission of an applicant to the public housing program if they have engaged in certain criminal activity or if the PHA has reasonable cause to believe that a household member's current use or pattern of use of illegal drugs, or current abuse or pattern of abuse of alcohol may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

Where the statute requires that the PHA prohibit admission for a prescribed period of time after some disqualifying behavior or event, the PHA may choose to continue that prohibition for a longer period of time [24 CFR 960.203(c)(3)(ii)].

HUD requires the PHA to deny assistance in the following cases:

- Any member of the household has been evicted from federally assisted housing in the last 3 years for drug-related criminal activity. HUD permits but does not require the PHA to admit an otherwise eligible family if the household member has completed a PHA-approved drug rehabilitation program or the circumstances which led to eviction no longer exist (e.g. the person involved in the criminal activity no longer lives in the household).

MHA Policy - The PHA will admit an otherwise-eligible family who was evicted from federally assisted housing within the past 3 years for drug-related criminal activity, if MHA is able to verify that the household member who engaged in the criminal activity has completed a supervised drug rehabilitation program

approved by MHA, or the person who committed the crime is no longer living in the household.

- The PHA determines that any household member is currently engaged in the use of illegal drugs. Drugs means a controlled substance as defined in section 102 of the Controlled Substances Act [21 U.S.C. 802]. Currently engaged in the illegal use of a drug means a person has engaged in the behavior recently enough to justify a reasonable belief that there is continuing illegal drug use by a household member [24 CFR 960.205(b)(1)].

MHA Policy - Currently engaged in is defined as any use of illegal drugs during the previous six months.

- The PHA has reasonable cause to believe that any household member's current use or pattern of use of illegal drugs, or current abuse or pattern of abuse of alcohol, may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

MHA Policy - In determining reasonable cause, MHA will consider all credible evidence, including but not limited to, any record of convictions, arrests, or evictions of household members related to the use of illegal drugs or the abuse of alcohol. A conviction will be given more weight than an arrest. MHA will also consider evidence from treatment providers or community-based organizations providing services to household members.

- Any household member has ever been convicted of drug-related criminal activity for the production or manufacture of methamphetamine on the premises of federally assisted housing.
- Any household member is subject to a lifetime registration requirement under a state sex offender registration program.

Permitted Reasons for Denial of Admission

Criminal Activity [24 CFR 960J03(c)]

The PHA is responsible for screening family behavior and suitability for tenancy. In doing so, the PHA may consider an applicant's history of criminal activity involving crimes of physical violence to persons or property and other criminal acts which would adversely affect the health, safety, or welfare of other tenants.

MHA Policy - If any household member is currently engaged in or has engaged in any of the following criminal activities, within the past three (3) years, the family will be denied admission.

- Drug-related criminal activity, defined by HUD as the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug [2a CFR 5.100].
- Violent criminal activity, defined by HUD as any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage [24 CFR 5.100].
- Criminal activity that may threaten the health, safety, or welfare of other tenants [24 CFR 960.203(c)(3)].
- Criminal activity that may threaten the health or safety of PHA staff, contractors, subcontractors, or agents.
- Criminal sexual conduct, including but not limited to sexual assault, incest, open and gross lewdness, or child abuse.

Evidence of such criminal activity includes, but is not limited to any record of convictions, arrests, or evictions for suspected drug-related or violent criminal activity of household members within the past three (3) years. A conviction for such activity will be given more weight than an arrest or an eviction.

Previous Behavior

HUD authorizes the PHA to deny admission based on relevant information pertaining to the family's previous behavior and suitability for tenancy.

In the event of the receipt of unfavorable information with respect to an applicant, the PHA must consider the time, nature, and extent of the applicant's conduct (including the seriousness of the offense). The PHA may also need to consider whether the cause of the unfavorable information may be that the applicant is the victim of domestic violence, dating violence, or stalking.

MHA Policy - MHA will deny admission to an applicant family if the PHA determines that the family:

- Has a pattern of unsuitable past performance in meeting financial obligations, including rent within the past three (3) years
- Has a pattern of disturbance of neighbors, destruction of property, or living or housekeeping habits at prior residences within the past three (3) years which may adversely affect the health safety, or welfare of other tenants.
- Has a pattern of eviction from housing or termination from residential programs within the past three (3) years (considering relevant circumstances)

- Owes rent or other amounts to this or any other PHA or owner in connection with any assisted housing program.
- Misrepresented or does not provide complete information related to eligibility, including income, award of preferences for admission, expenses, family composition or rent.
- Has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program.
- Has engaged in or threatened violent or abusive behavior toward MHA personnel.

Abusive or violent behavior towards MHA personnel includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.

Threatening refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.

The PHA will consider the existence of mitigating factors, such as loss of employment or other financial difficulties, before denying admission to an applicant based on the failure to meet prior financial obligations.

Screening

PHAs are authorized to obtain criminal conviction records from law enforcement agencies to screen applicants for admission to the public housing program. This authority assists the PHA in complying with HUD requirements and PHA policies to deny assistance to applicants who are engaging in or have engaged in certain criminal activities. In order to obtain access to the records the PHA must require every applicant family to submit a consent form signed by each adult household member [24 CFR 5.903].

The PHA may not pass along to the applicant the costs of a criminal records check [24 CFR 960.204(d)].

MHA Policy - MHA will perform criminal background checks through LIVESCAN or local law enforcement for all adult household members. If the results of the criminal background check indicate there may have been past criminal activity, but the results are inconclusive, MHA will request a fingerprint card and will request information from the National Crime Information Center (NCIC).

PHAs are required to perform criminal background checks necessary to determine whether any household member is subject to a lifetime registration requirement under a state sex offender program in the state where the housing is located, as well as in any other state where a household member is known to have resided [24 CFR 960.204(a)(4)].

If the PHA proposes to deny admission based on a criminal record or on lifetime sex offender registration information, the PHA must notify the household of the proposed action and must provide the subject of the record and the applicant a copy of the record

and an opportunity to dispute the accuracy and relevance of the information prior to a denial of admission [24 CFR 5.903(t) and 5.905(d)].

The PHA is responsible for the screening and selection of families to occupy public housing units. The PHA may consider all relevant information. Screening is important to public housing communities and program integrity, and to ensure that assisted housing is provided to those families that will adhere to lease obligations.

MHA Policy - The PHA will consider the family's history with respect to the following factors:

- Payment of rent
- Caring for a unit and premises
- Respecting the rights of other residents to the peaceful enjoyment of their housing
- Criminal activity that is a threat to the health, safety, or property of others
- Behavior off all household members as related to the grounds for denial.
- Compliance with any other essential conditions of tenancy

Application and Waitlist

Any family that wishes to reside in public housing must apply for admission to the program. HUD permits the PHA to determine the format and content of its applications, as well how such applications will be made available to interested families and how applications will be accepted by the PHA. However, the PHA must include Form HUD-92006, Supplement to Application for Federally Assisted Housing as part of the PHA's application.

MHA Policy - Depending upon the length of time that applicants may need to wait to be housed, MHA may use a one- or two-step application process.

A one-step process will be used when it is expected that a family will be selected from the waiting list within 60 days of the date of application. At application, the family must provide all the information necessary to establish family eligibility and the amount of rent the family will pay.

A two-step process will be used when it is expected that a family will not be selected from the waiting list for at least 60 days from the date of application. Under the two-step application process, MHA initially will require families to provide only the information needed to make an initial assessment of the family's eligibility, and to determine the family's placement on the waiting list. The family will be required to provide all of the information necessary to establish family eligibility and the amount of rent the family will pay when selected from the waiting list.

Families may obtain application forms from MHA's office during normal business hours. Families may also request - by telephone or by mail - a form be sent to the family via first class mail.

Completed applications must be returned to MHA by mail, by fax, or submitted in person during normal business hours. Applications must be complete in order to be accepted MHA for processing. If an application is incomplete, MHA will notify the family of the additional information required.

Placement on the Waiting List

The PHA must review each completed application received and make a preliminary assessment of the family's eligibility. The PHA must place on the waiting list families for whom the list is open unless the PHA determines the family to be ineligible. Where the family is determined to be ineligible, the PHA must notify the family in writing. Where the family is not determined to be ineligible, the family will be placed on a waiting list of applicants.

No applicant has a right or entitlement to be listed on the waiting list, or to any particular position on the waiting list.

Ineligible for Placement on the Waiting List

MHA Policy - If MHA can determine from the information provided that a family is ineligible, the family will not be placed on the waiting list. Where a family is determined to be ineligible MHA will send written notification of the ineligibility determination within 10 business days of receiving a completed application. The notice will specify the reasons for ineligibility and will inform the family of its right to request an informal hearing and explain the process for doing so.

Eligible for Placement on the Waiting List

MHA Policy - MHA will send written notification of the preliminary eligibility determination within 10 business days of receiving a completed application. If applicable, the notice will also indicate the waiting list preference(s) for which the family appears to qualify. Placement on the waiting list does not indicate that the family is, in fact, eligible for admission. A final determination of eligibility and qualification for preferences will be made when the family is selected from the waiting list.

Applicants will be placed on the waiting list according to MHA preference(s) and the date and time their complete application is received by MHA.

MHA will assign families on the waiting list according to the bedroom size for which a family qualifies as established in its occupancy standards. Families may request to be placed on the waiting list for a unit size smaller than designated by the occupancy guidelines (if the unit is not overcrowded according to MHA standards and local codes). However, in these cases, the family must agree not to request a transfer for two years after admission, unless they have a change in family size or composition.

The PHA may adopt one community-wide waiting list or site-based waiting lists. The PHA must obtain approval from HUD through submission of its Annual Plan before it may offer site-based waiting lists.

Site-based waiting lists allow families to select the development where they wish to reside and must be consistent with all applicable civil rights and fair housing laws and regulations.

MHA Policy - MHA will maintain one single community-wide waiting list for its developments. Within the list, MHA will designate subparts to easily identify who should be offered the next available unit (i.e. mixed populations, general occupancy, unit size, and accessible units).

The PHA will not adopt site-based waiting lists.

HUD directs that a family that applies to reside in public housing must be offered the opportunity to be placed on the waiting list for any tenant-based or project-based voucher or moderate rehabilitation program that the PHA operates if 1) the other programs' waiting lists are open, and 2) the family is qualified for the other programs.

HUD permits, but does not require that PHAs maintain a single merged waiting list for their public housing, Section 8, and other subsidized housing programs.

MHA Policy - MHA will not merge the public housing waiting list with the waiting list for any other program the PHA operates.

Closing the Waiting List

The PHA is permitted to close the waiting list, in whole or in part, if it has an adequate pool of families to fill its developments. The PHA may close the waiting list completely, or restrict intake by preference, type of project, or by size and type of dwelling unit.

MHA Policy - The PHA will close the waiting list when the estimated waiting period for housing applicants on the list reaches 12 months for the most current applicants. Where MHA has preferences or other criteria that require a specific category of family, MHA may elect to continue to accept applications from these applicants while closing the waiting list to others.

Reopening the Waiting List

If the waiting list has been closed, it may be reopened at any time. The PHA should publish a notice in local newspapers of general circulation, minority media and other suitable media outlets that the PHA is reopening the waiting list. Such notice must comply with HUD fair housing requirements. The PHA should specify who may apply, and where and when applications will be received.

MHA Policy - MHA will announce the reopening of the waiting list at least 10 business days prior to the date applications will first be accepted. If the list is only being reopened for certain categories of families, this information will be contained in the notice. The notice will specify where, when, and how applications are to be received.

The PHA will give public notice by publishing the relevant information in suitable media outlets including, but not limited to:

MARIN INDEPENDENT JOURNAL
SAN FRANCISCO CHRONICLE
MARIN HOUSING AUTHORITY WEBSITE

Selection Method

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the PHA will use.

Local Preferences [24 CFR 960.206]

PHAs are permitted to establish local preferences and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources [24 CFR 960.206(a)].

MHA Policy - The PHA will use the following local preferences:

Working Preference - In order to bring higher income families into public housing, MHA will establish a preference for "working" families, where the head, spouse, co-head, 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 a person with disabilities, will also be given the benefit of the working preference [24 CFR 960.206(b)(2)].

Domestic Violence Victims - When there is actual or threatened physical violence directed against the applicant or the applicant's family by a spouse or other household member who lives in the unit with the family. To qualify for this preference, the abuser must still reside in the unit from which the victim was displaced. The applicant must certify that the abuser will not reside with the applicant unless MHA gives prior written approval. MHA will approve the return of the abuser to the household after eviction only if a counselor, therapist, or other knowledgeable professional recommends in writing that the individual be allowed to reside with the family. If the abuser returns to the family without approval of MHA, MHA will deny or terminate assistance for breach of the

certification. MHA will take precautions to ensure the new location of the family is concealed in cases of domestic abuse.

Involuntary Displacement - Families are involuntarily displaced if they are required to vacate their housing as a result of:

- Natural Disaster declared by a local, state or federal government entity (fire, flood, earthquake, etc.) or any documented action by a local, state, or federal government entity related to code enforcement, public improvement or development.
- State or Federal Witness Protection to avoid reprisals because the family provided information on criminal activities to a law enforcement agency, and after a threat assessment the law enforcement agency recommends re-housing the family to avoid or reduce risk of violence against the family. The family must be a part of a State or Federal Witness Protection Program. Participation in a victim witness assistance program that offers only money to obtain services is not eligible for this preference.
- Hate Crimes - if a member of the family has been the victim of one or more hate crimes, including racial and ethnic harassment, and the applicant has vacated the unit because of the crime, or the fear of such a crime has destroyed the applicant's peaceful enjoyment of the unit. A hate crime is actual or threatened physical violence or intimidation that is directed against a person or his property and is based on the person's race, color, religion, sex, national origin, disability or familial status including sexual orientation and occurred within the last 30 days or is of continuing nature, (as defined in California Penal Code Section 422.6) The family must be referred by a law enforcement agency.

Homeless Preference - Applies to applicants who:

- Lack a fixed, regular and adequate nighttime residence.
- Have a primary nighttime residence that is a supervised public or private shelter providing temporary accommodations.
- A public or private place not ordinarily used as an accommodation for human being (lacks indoor plumbing; toilet facilities, bathing facilities, adequate or safe electrical service, heat or kitchen).

Family Preference –The family preference is available to two or more persons related by blood, marriage, adoption, or laws who will live together in the same dwelling, or two or more persons who live together and whose income and resources are available for use in meeting regular living expenses for the family.

Disabled Preference - The disabled preference is available when the applicant household will contain one or more members who are considered disabled as defined in Marin Housings policy.

Education Preference - Applies to applicants who meet any of the following requirements:

- The head of household, spouse, significant other or sole member is currently a student enrolled in or a graduate of in the last six months of, a school training program designed to prepare enrollees for the job market. A student is an individual who is attending a school or training program full-time (12 units or more).

Veteran Preference - This preference is for active members in the military, veterans, or surviving spouses of veterans. Dishonorably discharged veterans are not entitled to this preference.

Plan for Unit Offers

The plan for selection of applicants and assignment of dwelling units to assure equal opportunity and non-discrimination on grounds of race, color, sex, religion, or national origin is:

In the event of two or more eligible applicant's for the same unit size in the same rent range with identical preference/priority status, the date and time sequence of applications shall determine the order of selection, with the applicant who filed the earliest being offered the first available vacancy of appropriate size or application is completed first. If the applicant rejects an offer for a justifiable reason, as stated below, he or she shall retain his or her place on the eligible list.

If more than one unit of the appropriate type and size is available, the first unit to be offered will be the first unit that is ready for occupancy.

Housing Choice Voucher

Eligibility

MHA is responsible for ensuring that every individual and family admitted to the HCV program meets all program eligibility requirements. This includes any individual approved to join the family after the family has been admitted to the program. The family must provide any information needed by MHA to confirm eligibility and determine the level of the family's assistance.

To be eligible for the HCV program, the applicant family must:

- Qualify as a family as defined by HUD and MHA.
- Have income at or below HUD-specified income limits.

- Qualify based on citizenship or the eligible immigrant status of family members.
- Provide social security number information for family members as required.
- Consent to MHA's collection and use of family information as provided for in MHA-provided consent forms.

MHA must also determine that the current or past behavior of household members does not include activities that are prohibited by HUD or MHA.

Family

To be eligible for assistance, an applicant must qualify as a family. A family may be a single person or a group of persons. *Family* as defined by HUD includes a family with a child or children, two or more elderly or disabled persons living together, one or more elderly or disabled persons living with one or more live-in aides, or a single person. A single person family may be an elderly person, a displaced person, a disabled person, or any other single person. MHA has the discretion to determine if any other group of persons qualifies as a family.

Gender Identity means actual or perceived gender characteristics.

Sexual orientation means homosexuality, heterosexuality, or bisexuality.

MHA Policy - A family also includes two or more individuals who are not related by blood, marriage, adoption, or other operation of law but who either can demonstrate that they have lived together previously or certify that everyone's income and other resources will be available to meet the needs of the family.

Each family must identify the individuals to be included in the family at the time of application and must update this information if the family's composition changes. When the family is housed from the waiting list at least one member from the initial application must be a part of the household. This may include any updates made to the application due to childbirth, adoption, or court awarded custody.

Using Income Limits for Eligibility [24 CFR 982.201]

Income limits are used for eligibility only at admission. Eligibility is established by comparing a family's annual income with HUD's published income limits. To be income-eligible, a family must be one of the following:

- A *very low-income* family
- A *low-income* family that has been "continuously assisted" under the 1937 Housing Act. A family is continuously assisted if the family is already receiving

assistance under any 1937 Housing Act program at the time the family is admitted to the HCV program [24 CFR 982.4]

MHA Policy - MHA will consider a family to be continuously assisted if the family was leasing a unit under any 1937 Housing Act program at the time, they were issued a voucher by MHA.

- A low-income family that qualifies for voucher assistance as a non-purchasing household living in HOPE 1 (public housing homeownership), HOPE 2 (multifamily housing homeownership) developments, or other HUD-assisted multifamily homeownership programs covered by 24 CFR 248.173.
- A low-income or moderate-income family that is displaced as a result of the prepayment of a mortgage or voluntary termination of a mortgage insurance contract on eligible low-income housing as defined in 24 CFR 248.101.

HUD permits MHA to establish additional categories of low-income families that may be determined eligible. The additional categories must be consistent with MHA plan and the consolidated plans for local governments within MHA's jurisdiction.

MHA Policy - MHA has not established any additional categories of eligible low-income families.

Citizenship or Eligible Immigration Status [24 CFR 5, Subpart E]

Housing assistance is available only to individuals who are U.S. citizens, U.S. nationals (herein referred to as citizens and nationals), or noncitizens that have eligible immigration status. At least one family member must be a citizen, national, or noncitizen with eligible immigration status for the family to qualify for any level of assistance.

All applicant families must be notified of the requirement to submit evidence of their citizenship status when they apply. Where feasible, and in accordance with MHA's Limited English Proficiency Plan, the notice must be in a language that is understood by the individual if the individual is not proficient in English.

Social Security Numbers [24 CFR 5.216 and 5.218]

The applicant and all members of the applicant's household members, including persons under age 6 as per 24 CFR 5.216, must provide documentation of a valid Social Security Number (SSN) or a certification stating that no SSN has been issued. If a household member who is required to execute a certification is less than 18 years old, the certification must be executed by the individual's parent or guardian [24 CFR 5.216(j)]. Assistance cannot be provided to a family until all SSN documentation requirements are met. MHA must deny assistance to an applicant family if they do not meet the SSN disclosure, documentation and verification, and certification requirements contained in 24 CFR 5.216.

Family Consent to Release of Information [24 CFR 5.230]

HUD requires each adult family member, and the head of household, spouse, or co-head, regardless of age, to sign form HUD-9886, Authorization for the Release of Information/Privacy Act Notice, and other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. MHA must deny admission to the program if any member of the applicant family fails to sign and submit the consent forms for obtaining information in accordance with 24 CFR 5, Subparts B and F [24 CFR 982.552(b)(3)].

A family that does not meet the eligibility criteria discussed above, must be denied assistance. In addition, HUD requires or permits MHA to deny assistance based on certain types of current or past behaviors of family members.

Mandatory Denial of Assistance [24 CFR 982.553(a)]

HUD requires MHA to deny assistance in the following cases:

- Any member of the household has been evicted from federally assisted housing in the last 3 years for drug-related criminal activity. HUD permits, but does not require, MHA to admit an otherwise eligible family if the household member has completed an MHA-approved drug rehabilitation program or the circumstances which led to eviction no longer exist (e.g., the person involved in the criminal activity no longer lives in the household).

MHA Policy - MHA will admit an otherwise-eligible family who was evicted from federally assisted housing within the past 3 years for drug-related criminal activity, if MHA is able to verify that the household member who engaged in the criminal activity has completed a supervised drug rehabilitation program approved by MHA, or the person who committed the crime, is no longer living in the household.

- MHA determines that any household member is currently engaged in the use of illegal drugs.

MHA Policy - *Currently engaged in* is defined as any use of illegal drugs during the previous six months.

- MHA has reasonable cause to believe that any household member's current use or pattern of use of illegal drugs, or current abuse or pattern of abuse of alcohol, may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

MHA Policy - In determining reasonable cause, MHA will consider all credible evidence, including but not limited to, any record of convictions, arrests, or

evictions of household members related to the use of illegal drugs or the abuse of alcohol. A conviction will be given more weight than an arrest. MHA will also consider evidence from treatment providers or community-based organizations providing services to household members.

Pattern has been established with two or more incidents have occurred within the previous twelve months.

- Any household member has ever been convicted of drug-related criminal activity for the production or manufacture of methamphetamine on the premises of federally assisted housing
- Any household member is subject to a lifetime registration requirement under a state sex offender registration program.

Other Permitted Reasons for Denial of Assistance

HUD permits, but does not require, MHA to deny assistance for the reasons discussed in this section.

Criminal Activity [24 CFR 982.553]

HUD permits, but does not require, MHA to deny assistance if MHA determines that any household member is currently engaged in or has engaged in during a reasonable time before the family would receive assistance, certain types of criminal activity.

MHA Policy - If any household member is currently engaged in or has engaged in any of the following criminal activities, within the past five years, the family will be denied assistance.

- *Drug-related criminal activity*, defined by HUD as the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug [24 CFR 5.100].
- *Violent criminal activity*, defined by HUD as any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage [24 CFR 5.100].
- *Criminal activity* that has any of the following elements, including, but not limited to fraud, embezzlement, stalking, perjury and larceny.
- *Felonious criminal activity* refers to any activity that is classify as a felony under Federal, State and/or Local laws.

- *Criminal sexual conduct* including but not limited to sexual assault, incest, open and gross lewdness, or child abuse and/or child molestation.

A household member who is currently under supervised probation or parole will be denied assistance unless he/she will present evidence of full compliance with terms or arraignment.

Criminal activity that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity; or

Criminal activity that may threaten the health or safety of property owners and management staff, and persons performing contract administration functions or other responsibilities on behalf of MHA (including a MHA employee or a MHA contractor, subcontractor, or agent).

Immediate vicinity means within a three-block radius of the premises.

Evidence of such criminal activity includes, but is not limited to:

- Any conviction for drug-related or violent criminal activity within the past 5 years.
- Any arrests for drug-related or violent criminal activity within the past 5 years.
- Any record of eviction from public or privately-owned housing as a result of criminal activity within the past 5 years.
- A conviction for drug-related or violent criminal activity will be given more weight than an arrest for such activity.

Previous Behavior in Assisted Housing [24 CFR 982.552(c)]

HUD authorizes MHA to deny assistance based on the family's previous behavior in assisted housing:

MHA Policy - MHA **will not** deny assistance to an otherwise eligible family because the family previously failed to meet its obligations under the Family Self-Sufficiency (FSS) program.

MHA **will** deny assistance to an applicant family if:

- The family does not provide information that MHA or HUD determines is necessary in the administration of the program.
- The family does not provide complete and true information to MHA.

- Any family member has been evicted from federally assisted housing in the last five years.
- Any PHA has ever terminated assistance under the program for any member of the family.
- Any family member has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program.
- The family owes rent or other amounts to any PHA in connection with Section 8 or other public housing assistance under 1937 ACT, unless the family repays the full amount of the debt prior to being selected from the waiting list.

If the family has not reimbursed any PHA for amounts MHA paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease, unless the family repays the full amount of the debt prior to being selected from the waiting list.

The family has breached the terms of a repayment agreement entered into with MHA, unless the family repays the full amount of the debt covered in the repayment agreement prior to being selected from the waiting list.

A family member has engaged in or threatened violent or abusive behavior toward MHA personnel.

Abusive or violent behavior towards MHA personnel includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.

Threatening refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.

Screening

Screening for Eligibility

MHA is authorized to obtain criminal conviction records from law enforcement agencies to screen applicants for admission to the HCV program. This authority assists MHA in complying with HUD requirements and MHA policies to deny assistance to applicants who are engaging in or have engaged in certain criminal activities. In order to obtain access to the records MHA must require every applicant family to submit a consent form signed by each adult household member [24 CFR 5.903].

MHA Policy - MHA will perform a criminal background check through local law enforcement for every adult household member. Criminal Background may include fingerprints card for each adult in the family.

If the results of the criminal background check indicate that there may be past criminal activity, but the results are inconclusive, MHA **may** request a fingerprint card and will request information from the National Crime Information center (NCIC).

MHA is required to perform criminal background checks necessary to determine whether any household member is subject to a lifetime registration requirement under a state sex offender program in the state where the housing is located, as well as in any other state where a household member is known to have resided [24 CFR 982.553(a)(2)(i)].

If MHA proposes to deny assistance based on a criminal record or on lifetime sex offender registration information, MHA must notify the household of the proposed action and must provide the subject of the record and the applicant a copy of the record and an opportunity to dispute the accuracy and relevance of the information prior to a denial of admission. [24 CFR 5.903 (f) and 5.905(d)].

Screening for Suitability as a Tenant [24 CFR 982.307]

MHA has no liability or responsibility to the owner for the family's behavior or suitability for tenancy.

MHA may opt to conduct additional screening to determine whether an applicant is likely to be a suitable tenant.

MHA Policy - MHA will not conduct additional screening to determine an applicant family's suitability for tenancy. The owner is responsible for screening and selection of the family to occupy the owner's unit. MHA must inform the owner that screening and selection for tenancy is the responsibility of the owner. An owner may consider a family's history with respect to factors such as: payment of rent and utilities, caring for a unit and premises, respecting the rights of other residents to the peaceful enjoyment of their housing, criminal activity that is a threat to the health, safety or property of others, and compliance with other essential conditions of tenancy.

HUD requires MHA to provide prospective owners with the family's current and prior address (as shown in MHA records) and the name and address (if known) of the owner at the family's current and prior addresses. HUD permits MHA to provide owners with additional information, as long as families are notified that the information will be provided, and the same type of information is provided to all owners.

MHA Policy - MHA will inform owners of their responsibility to screen prospective tenants, and will provide owners with the required known name and address information, at the time of the initial HQS inspection or before. MHA will not provide any additional information to the owner, such as tenancy history, criminal history, etc.

Wait List and Selection

Any family that wishes to receive HCV assistance must apply for admission to the program. HUD permits MHA to determine the format and content of HCV applications, as well how such applications will be made available to interested families and how applications will be accepted by MHA. However, MHA must include Form HUD-90026, Supplement to Application for Federally Assisted Housing, as part of MHA's application.

MHA Policy - Depending upon the length of time that applicants may need to wait to receive assistance, MHA may use a one- or two-step application process.

A one-step process will be used when it is expected that a family will be selected from the waiting list within 60 days of the date of application. At application, the family must provide all of the information necessary to establish family eligibility and level of assistance.

A two-step process will be used when it is expected that a family will not be selected from the waiting list for at least 60 days from the date of application. Under the two-step application process, MHA initially will require families to provide only the information needed to make an initial assessment of the family's eligibility, and to determine the family's placement on the waiting list. The family will be required to provide all of the information necessary to establish family eligibility and level of assistance when the family is selected from the waiting list.

Families may obtain application forms from MHA's office during normal business hours. MHA may opt to only accept application via internet. When this occurs the PHA will arrange to have local resources available to assist those that require assistance.

Elderly or disabled families may request that an application be sent to the family.

Completed applications must be returned to MHA by mail, by fax, or submitted in person during normal business hours or otherwise instructed on the application. Applications must be complete in order to be accepted by MHA for processing. If an application is incomplete, MHA will notify the family of the additional information required.

Placement on the Waiting List

MHA must review each complete application received and make a preliminary assessment of the family's eligibility. MHA must accept applications from families for whom the list is open unless there is good cause for not accepting the application (such as denial of assistance) for the grounds stated in the regulations [24 CFR 982.206(b)(2)]. Where the family is determined to be ineligible, MHA must notify the family in writing [24 CFR 982.201(f)]. Where the family is not determined to be ineligible, the family will be placed on a waiting list of applicants.

No applicant has a right or entitlement to be listed on the waiting list, or to any particular position on the waiting list [24 CFR 982.202(c)].

Organization of the Waiting List [24 CFR 982.204 and 205]

MHA's HCV waiting list must be organized in such a manner to allow MHA to accurately identify and select families for assistance in the proper order, according to the admissions policies described in the plan.

The waiting list must contain the following information for each applicant listed:

- Applicant name;
- Family unit size;
- Date and time of application;
- Qualification for any local preference;
- Racial or ethnic designation of the head of household.

HUD requires MHA to maintain a single waiting list for the HCV program unless it serves more than one county or municipality. Such MHAs are permitted, but not required, to maintain a separate waiting list for each county or municipality served.

MHA Policy - MHA will maintain a single waiting list for the HCV program.

HUD directs that a family that applies for assistance from the HCV program must be offered the opportunity to be placed on the waiting list for any public housing, project-based voucher or moderate rehabilitation program MHA operates if 1) the other programs' waiting lists are open, and 2) the family is qualified for the other programs.

HUD permits, but does not require, that MHAs maintain a single merged waiting list for their public housing, Section 8, and other subsidized housing programs.

A family's decision to apply for, receive, or refuse other housing assistance must not affect the family's placement on the HCV waiting list, or any preferences for which the family may qualify.

MHA Policy - MHA will not merge the HCV waiting list with the waiting list for any other program MHA operates.

Closing the Waiting List

MHA is permitted to close the waiting list if it has an adequate pool of families to use its available HCV assistance. Alternatively, MHA may elect to continue to accept applications only from certain categories of families that meet particular preferences or funding criteria.

MHA Policy - MHA will close the waiting list when the estimated waiting period for housing assistance for applicants on the list reaches 24 months for the most current applicants. Where MHA has particular preferences or funding criteria that require a specific category of family, MHA may elect to continue to accept applications from these applicants while closing the waiting list to others.

Reopening the Waiting List

If the waiting list has been closed, it cannot be reopened until MHA publishes a notice in local newspapers of general circulation, minority media, and other suitable media outlets. The notice must comply with HUD fair housing requirements and must specify who may apply, and where and when applications will be received.

MHA Policy - MHA will announce the reopening of the waiting list at least 10 business days prior to the date applications will first be accepted. If the list is only being reopened for certain categories of families, this information will be contained in the notice.

Selection Method

MHA must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that MHA will use [24 CFR 982.202(d)].

MHA is permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits MHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with MHA plan and the consolidated plan and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

Local Preferences

Local preferences will be used to select among applicants on the waiting list. Local preferences will be given to applicants who are otherwise eligible and who, at the time information is verified, meet the definitions of the preferences described below. Applicants without local preferences will be placed at the end of the waiting list, after those with preference points, according to lottery determined sequence.

MHA has adopted the following Local Preferences for families, elderly, and disabled applicants only:

1. Involuntary Displacement: (20 points)

Families are involuntarily displaced if they are required to vacate their housing as a result of:

- Domestic Violence applicants are given this preference one of two ways:
 - 1) For those currently on the waitlist: To qualify for this preference a victim must prove that he/she was displaced at the time of the domestic violence and that the involuntary displacement was the result of the domestic violence. Proof can be a police report or other legal document. If the family did not report to the police but has seen or was assisted by an expert or medical professional such as a physician or physical/psychotherapist or a public or private facility giving shelter and/or counseling to such victims or a social service agency or a church, a written verification from that entity would be required. The involuntary displacement must have occurred no earlier than 12 months prior to the original wait list application date.
 - 2) If they are declared either by The Center for Domestic Peace (formerly MAWS) or CalWORKs. MHA has set aside a maximum of 15 vouchers per year for this preference for applicants who are in immediate need of vacating their housing due to imminent health and safety dangers from domestic violence. In order to receive this preference applicant must be referred either by the Center for Domestic Peace or CalWORKs. According to the MOU between MHA the Center for Domestic Peace or CalWORKs, proof of client participation in the programs, proof of involuntarily displacement, proof of documentation that the clients were survivors of domestic violence upon entry, as well as other eligibility criteria at the time of application for client consideration for these preference points. The Center for Domestic Peace or CalWORKs will provide a minimum of three (3) months of supportive services. (See attachment D for complete MOU). This preference is available even when the waiting list is closed to other applicants.
- Natural Disaster declared by a local, state, or federal government entity (fire, flood, earthquake, etc.) documented from the American Red Cross. Written verification

from the American Red Cross must be provided. MHA has set aside a maximum of 15 vouchers per year for this preference for applicants who are in immediate need of vacating their housing due to imminent health and safety dangers from a natural declared disaster. This preference is available even when the waiting list is closed to other applicants

- Imminent Domain through any documented action by a local, state, or federal government entity related to code enforcement, public improvement or development. MHA has set aside a maximum of 5 vouchers per year for this preference for applicants who are in immediate need of vacating their housing due to imminent health and safety dangers from a government action.

This preference is available even when the waiting list is closed to other applicants. Written verification from a code enforcement or public improvement agency must be provided.

- State or Federal Witness Protection - Avoidance of reprisal/witness protection: Relocation is required because the applicant provided information regarding criminal activities to a law enforcement agency or testimony in a criminal proceeding, and based upon a threat assessment, a law enforcement agency or HUD recommends the relocation of the applicant to avoid or minimize risk of violence against the applicant as reprisal for providing such information. This preference may only be invoked by MHA if the following documentation is provided on a law enforcement agencies or HUD's letterhead: documentation that, following a threat assessment conducted by the law enforcement agency or HUD, such organization recommends the relocation / re-housing of the household to avoid or minimize the threat of violence or reprisal to or against the household member(s) for providing such information. This includes situations in which the applicant and / or family member(s) are themselves the victims of such crimes and have provided information or testimony to a law enforcement agency or during a legal proceeding. This preference is available to anyone upon satisfaction of the conditions set forth herein, including but not limited to, residents of MHA's public housing and even when the waiting list is closed to other applicants.

MHA has set aside a maximum of 5 vouchers per year for this preference for applicants who need witness protection / avoiding reprisal, unless otherwise authorized by the Executive Director.

Eligibility, including background checks, will be confirmed for all members of the household pursuant to other sections of the Administrative Plan.

2. Family, Elderly or Disabled Preference: (8 points)

- a) Family Preference is available to one or more persons related by blood, marriage, adoption, or laws who will live together in the same dwelling, or two or more persons who live together and whose income and resources are available for use in meeting regular living expenses for the family.
- b) Elderly Preference is available when the head of household or spouse/co-head is aged 62 or older.
- c) Disabled Preference is available when either the head of household or spouse/co-head in the applicant's household are considered disabled as defined in Marin Housing's policy.

3. Individuals or Families with Disabilities Who Have Successfully Participated in or Are A Current Participant in a Supportive Housing Program for Disabled Homeless Person(s): (8 points)

This preference is only available to individuals or families with disabilities who have successfully participated in or are a current participant in good standing in a supportive housing program for disabled homeless person(s). Persons receiving this preference who upon verification are found not to qualify for the preference as set forth below will lose the preference points and if they were admitted to the waiting list when only applications for this preference were being taken, they will be removed from the waiting list. If the applicant was placed on the waiting list while applications for all preferences were being accepted the applicant's points will be adjusted and s/he will be placed back on the waiting list.

In order to qualify for this preference, the applicant must be able to supply the name and address of the supportive housing program. The applicant must attach the following documents to the application in order to qualify for this preference:

- A verification of homeless status and supportive housing participation.

Once the applicant is pulled from the waiting list and MHA begins processing the application MHA will contact the supportive housing provider to verify, by the submission of a completed MHA verification form for this preference and/or a letter with the equivalent information, that the program provides the following type of housing services. If the supportive housing program does not meet the criteria listed below the applicant is not eligible for the preference and his/her name will be withdrawn from the waiting list.

Additionally, MHA will require the submission of a completed MHA verification form for this preference by the supportive housing program.

It should be noted, for the purposes of this preference, that supportive housing is different from transitional housing or homeless shelter programs. Transitional housing and homeless shelter programs have a time limit on the stay of the residents or tenants. While both transitional housing and homeless shelter programs may provide case management and other supportive services, they are not permanent housing. Supportive housing is permanent housing, i.e., no time limit on the tenancy of the resident.

The supportive housing program must be one that is safe and provide well-designed housing that is:

- Affordable to people coming out of homelessness, and
- Independent, with each tenant in his/her own apartment, holding his/her own lease, and responsible for paying his/her own rent, and
- Permanent, a tenant can stay if he/she pays his/her rent and complies with the terms of his/her lease.

MHA will contact the supportive housing provider to verify that the program provides the following supportive services. If the program does not meet the criteria listed below the applicant is not eligible for the preference.

Supportive services are provided by staff trained in working with people who are homeless and people with disabilities. The supportive services must be:

- Designed to maximize independence, and
- Flexible and responsive to tenant needs, and
- Available as and when needed, and
- Accessible where the tenant lives.

MHA will contact the supportive housing provider to verify that the applicant was homeless prior to entering the supportive housing program and that the person has a disability, as defined by HUD. If the program does not provide verification of homeless status and disability prior to entering the supportive housing program the applicant is not eligible for the preference and his/her name will be withdrawn from the waiting list.

To be classified as homeless, the applicant must have been a homeless person living in an emergency shelter, supportive housing for homeless persons, or in places not designed for, or ordinarily used as, a regular sleeping accommodation for human beings and/or;

- Lack a fixed, regular and adequate nighttime residence,

- Have a primary nighttime residence that is a supervised public or private shelter providing temporary accommodations,
- A public or private place not ordinarily used as an accommodation for human beings.
- Lacks indoor plumbing, toilet facilities, bathing facilities, adequate or safe electrical service, heat, or kitchen.

MHA will contact the supportive housing provider to verify that the applicant is no longer in need of case management services in order to maintain an independent housing situation. If the program does not provide this verification the applicant is not eligible for the preference and his/her name will be withdrawn from the waiting list.

No more than 25 pre-applications will be placed on the waiting list. Those 25 pre-applications will be determined using the lottery system described in the Administrative Plan.

No more than 25% of applicants pulled from the waiting list each year may be applicants from this preference group.

4. Homeless Preference: (4 points)

Applies to applicants who:

- Lack a fixed, regular and adequate nighttime residence, have a primary nighttime residence that is a supervised public or private shelter providing temporary accommodations,
- A public or private place not ordinarily used as an accommodation for human beings.
- Lacks indoor plumbing, toilet facilities, bathing facilities, adequate or safe electrical service, heat, or kitchen.

Written certification, through the submission of a completed MHA verification form for this preference and/or a letter with the equivalent information, by a public or private facility providing shelter, the police, a social services agency or other knowledgeable professionals that serve homeless persons is required to verify this preference. A MHA inspector may verify that the applicant is living in a place not normally used for human habitation. If a family is in transitional housing, they are considered homeless. However, a written statement is required from the agency providing the transitional housing.

All verification must be dated within 60 days from the date of interview.

5. Working or Educational Preference: (2 points)

Applies to applicants who meet any of the following requirements:

- The head of household, spouse/co-head or sole member is employed at least 32 hours per week;
- The head of household, spouse/co-head or sole member is age 62 or older;
- The head of household, spouse/co-head or sole member is disabled;
- The head of household, spouse/co-head or sole member is currently a student enrolled in, or a graduate in the last six months of, a school training program designed to prepare enrollees for the job market.

(A student is an individual who is attending a school or training program full-time. A full-time student is a student who is enrolled for the number of hours or courses the school considers full-time attendance.)

6. Residency Preference: (2 points)

Applies to applicants who meet any of the following requirements:

- The head of household, spouse/co-head or sole member is a current resident of Marin County.
- The head of household, spouse/co-head or sole member is employed in Marin County at least 32 hours a week.

7. Veteran Preference: (4 points)

Applies to applicant households whose head of household or spouse/co-head is a current member of the military, a veteran, or a surviving spouse of a veteran. Dishonorably discharged veterans are not entitled to this preference.

MHA will require U.S. government documents which indicate that the applicant qualifies under the above definition.

Family Unification Program

Based on the availability of targeted voucher funding, MHA recognizes the following separate local preference to its Section 8 Housing Choice Voucher Waiting List:

- Families certified by Marin County Department of Health and Human Services, Division of Social Services, Children & Family Services (CFS) as a family for whom the lack of adequate housing is a primary factor in the imminent placement of the family’s child, or children, in out-of-home care, or in the delay of discharge of a child, or children, to the family from out-of-home care and that MHA has determined

to be eligible for a Family Unification Program (FUP) Housing Choice Voucher. These families may be:

- 1. A current MHA waiting list applicant identified to and certified by the CFS as a FUP-eligible family and assisted in position number order after certification; or*
- 2. A FUP-eligible family referred from the CFS and placed on the MHA Section 8 waiting list in order of first come, first served.*

MHA also has the following programs that receive targeted funding from HUD and for which admissions are handled separately from the Section 8 waiting list:

Veterans Affairs Supportive Housing

If a family no longer needs case management as determined by the Veterans Affairs Medical Center, the family is still eligible for rental assistance under the Section 8 HCV program. In cases where case management is no longer needed, MHA will use one of its own vouchers, if available; to continue assisting this family and free up a voucher for another HUD-VASH eligible family.

If a regular voucher is not available, the family will continue utilizing the HUD-VASH voucher.

Please note that if a HUD-VASH voucher is switched from a HUD-VASH voucher to a regular voucher, the family is not subject to MHA's waiting list because the family is already a participant in the MHA's Section 8 HCV program.

Order of Selection

Families will be selected from the waiting list based on preference. Among applicants with the same preference, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by MHA for Public Housing and by lottery for the Housing Choice Voucher Program.

For Public Housing, when selecting applicants from the waiting list, MHA will match the characteristics of the available unit (unit size, accessibility features, unit type) to the applicants on the waiting list. MHA will offer the unit to the highest-ranking applicant who qualifies that unit size or type or that requires the accessibility features.

By matching unit and family characteristics, it is possible that families who are lower on the waiting list may receive an offer of housing ahead of families with an earlier date and time of application or higher preference status.

Factors such as deconcentration or income-mixing and income targeting will also be considered in accordance with HUD requirements and PHA policy.

Financial Resources

The table below lists the Housing Authority of the County of Marin’s anticipated financial resources, such as PHA Operating, Capital and other anticipated Federal resources available to the Agency, as well as tenant rents and other income available to support the Public Housing and Housing Choice Voucher Programs in Fiscal Year 2021.

Central Office Cost Center & Local Fund	Public Housing and Capital Grant Programs	Housing Choice Voucher Program	QUAD properties (Isabel Cook, Fairfax, Sundance and Bradley House)	Supportive Housing Programs	BMR, Home Ownership & Loan Programs	
496 units		2187 vouchers			67 units	
Total Revenue	\$1,999,309	\$6,556,752	\$53,430,716	\$1,961,898	\$3,928,907	\$565,120
Total Expenditures	\$1,720,775	\$6,556,752	\$53,430,716	\$1,961,898	\$3,928,907	\$565,120
Net Revenues	\$278,534	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0

Rent Determination

Public Housing

The first step in calculating income-based rent is to determine each family's total tenant payment (TTP). Then, if the family is occupying a unit that has tenant-paid utilities, the utility allowance is subtracted from the TTP. The result of this calculation, if a positive number, is the tenant rent. If the TTP is less than the utility allowance, the result of this calculation is a negative number, and is called the utility reimbursement, which may be paid to the family or directly to the utility company by the PHA.

TTP Formula [24 CFR 5.628]

HUD regulations specify the formula for calculating the total tenant payment (TTP) for a tenant family. TTP is the highest of the following amounts, rounded to the nearest dollar:

- 30 percent of the family's monthly adjusted income
- 10 percent of the family's monthly gross income
- The welfare rent (in as-paid states only)
- A minimum rent between \$0 and \$50 that is established by the PHA

The PHA has authority to suspend and exempt families from minimum rent when a financial hardship exists.

MHA Policy - Welfare rent does not apply to the locality MHA serves.
MHA Policy – MHA has set the minimum rent for the locality it serves at \$50.00.

Housing Choice Voucher

HUD regulations specify the formula for calculating the total tenant payment (TTP) for an assisted family. TTP is the highest of the following amounts, rounded to the nearest dollar:

- 30 percent of the family’s monthly adjusted income
- 10 percent of the family’s monthly gross income
- The welfare rent (in as-paid states only)
- A minimum rent between \$0 and \$50 that is established by MHA

MHA has authority to suspend and exempt families from minimum rent when a financial hardship exists.

The amount that a family pays for rent and utilities (the family share) will never be less than the family’s TTP but may be greater than the TTP depending on the rent charged for the unit the family selects.

MHA Policy - Welfare rent does not apply in the locality that MHA serves.
MHA Policy – MHA has set a minimum rent for the locality it serves at \$50.00.

Grievance Procedures

Public Housing

All Public Housing residents have the right to appeal decisions or actions of the Marin Housing Authority through application of the Grievance Procedure. The full Grievance Procedure is part of the ACOP and is also included on the Authority’s website.

The Grievance Procedure cannot be used in cases of criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents or employees and any drug-related criminal activity on or near the premises.

Applicants are afforded an informal review process if they believe they have been wrongly denied eligibility to the Program. The informal review process provides the applicant with an opportunity to informal present new information or refute existing information. The review process is covered in the ACOP.

Housing Choice Voucher

Marin Housing must give an applicant to the HCV Program an opportunity for an informal review of the decision to deny assistance to the applicant.

In addition, Marin Housing must give a participant of the HCV Program an opportunity for an informal hearing to consider whether certain decisions relating to the individual circumstances of the participant are in accordance with the law, HUD regulations and MHA policies.

The process for conducting an informal review and informal hearing are included in the HCV Administrative Plan which is available on the Authority's website.

Homeownership Programs

Public Housing

Marin Housing does not plan to sell any public housing units as part of a homeownership program in the upcoming Fiscal year.

Section 8 Tenant-Based Assistance

The Housing Choice Voucher Homeownership Program provides current voucher holders with the ability to expand their housing opportunities beyond the rental market and use their assistance to purchase homes in the communities of their choice. Some key components of the HCV Homeownership are listed below.

Minimum Income Requirements

- A participating family must have a gross annual income equal to the Federal minimum wage multiplied by 2000, based on the income of adult family members who will own the home
- For disabled families, the minimum income requirement is equal to the current SSI monthly payment for an individual living alone, multiplied by twelve
- Welfare assistance is not accepted as income, but would be used in calculating rent
- Must have at least enough for a down payment and closing costs (closing costs are approximately 6% of purchase price; 20% of the purchase price for down payment and closing is realistic)

Special Exceptions for Elderly/Disabled Households

- No time limits of assistance – will continue for the life of mortgage if eligibility continues
- No minimum work requirements
- Elderly/Disabled applicants still need to secure their own financing and to have adequate funds for down payment & closing costs
- This most realistically works for households who receive inheritances, special needs trusts, or have a large lump sum for down payment

Considerations

- Household must qualify and secure their own financing from a bank (MHA will refer you to a lender familiar with the program)
- Must secure a 30-year fixed-rate loan – no adjustable-rate mortgages are allowed
- Household would need to find a unit that they could afford (a below market rate unit)
- The assistance from the MHA lasts for a maximum of fifteen years (except elderly /disabled)
- Program is essentially established for communities where housing is more affordable – in the \$100,000 to \$200,000 range which is very difficult to locate in Marin and Bay Area; Program may be used with the BMR Lottery Program

How it actually works – The Formula:

- Total housing costs (mortgage, prop. taxes, homeownership dues, insurance) should equal payment standard for voucher size held (if 2BR: \$2151)
- If housing costs exceed payment standard, Marin Housing will allow household to pay maximum of 40% of monthly adjusted gross income out of pocket

Below Market Rate (BMR) Homeownership Program

The BMR Home Ownership program offers low and moderate-income, first-time homebuyers the opportunity to purchase specified condominium units in Marin County at less than market value. Marin Housing administers the sale of newly constructed units as well as previously owned units being offered for resale. There are approximately 340 homes in the program located throughout Marin County.

Community Service and Self-Sufficiency Programs

MHA's Supportive Housing Department assists families and individuals with special needs to secure and maintain stable housing in the community. The Supportive Housing Department's largest program is Shelter Plus Care, which provides rental assistance and supportive services to homeless where the head of household has a serious mental illness and may also have a substance abuse history and/or compromising medical conditions. The program is intended to help participants achieve three overall goals: residential stability, increased skill levels and/or incomes, and greater self-determination. The Marin Housing Authority ("MHA") also administers HOPWA, VASH and FSS programs.

Shelter Plus Care

Marin County Shelter Plus Care Program is a housing subsidy program for individuals who are chronically homeless and suffer from a qualifying disability. The Program is funded by the U.S. Department of Housing and Urban Development and Marin County Mental Health and Substance Use Services. Participants pay approximately 30% of their income towards rent and receive ongoing supportive services from Marin Housing Authority case managers.

Who is eligible?

Persons classified as homeless according to at least one of the below definitions (Priority will be given to those who meet Chronically Homeless definition according to HUD)

- Has been chronically homeless because she/he has been continuously homeless for a year or more or has in the last three years been homeless for a cumulative total of twelve months.
- Is living in transitional housing for homeless and originally coming from the streets or an emergency shelter
- Currently sleeping in a place not meant for human habitation or in emergency shelter or in hotel/motel paid for by community organization

- Exiting an institution where she/he has resided less than ninety days and having resided in an emergency shelter or in a place not fit for human habitation prior to entering the institution.

And

- Referred from Marin County Mental Health and Substance Use Services or Ritter Center. Interagency referral form needs to be filled out by County workers or Ritter Center staffs certifying that the client meets the disability criteria set by the program.

What is the Service Offered?

MHA case managers will offer clients a monthly to weekly meetings which focuses on addressing the needs, providing support, and help clients achieve their own goals.

Family Self-Sufficiency

Marin Housing Authority is authorized to develop and administer a Family Self-Sufficiency (FSS) Program for its Public Housing and Housing Choice Voucher residents.

The objectives of the FSS Program are to reduce the dependency of Public Housing and Housing Choice Voucher residents on welfare and other public assistance programs and enhance economic independence through community coordinated efforts including: high school diploma and higher education programs, job training, employment opportunities, personal social and life skill training, child care programs, personal financial management, counseling and related social service assistance.

FSS Eligibility Requirements

- FSS Participants must be the head of household or household members over the age of 18 enrolled MHA's Public Housing or Housing Choice Voucher Programs.
- All potential FSS participants will receive information in the Public Housing or Housing Choice Voucher briefing, annual and interim recertifications.
- Prospective applicants may complete an application, view the orientation, and set up a meeting with an FSS staff to complete an assessment.
- Applicants must be motivated to access community resources to increase their education, employment skills, seek out and take hold of opportunities for interpersonal development.

FSS Activities & Supportive Services

- Complete an FSS application and assessment.
- Sign a Contract of Participation: Participants will meet with the FSS staff to review and sign a Five-Year Contract.
- Complete an Individual Training and Service Plan: Participants will meet with the FSS staff to develop a plan to accomplish their goals.
- Request and Receive Referrals: The FSS staff will provide participants with referrals to programs and services offered by community agencies.
- Participate in Educational and Work-Related Activities: All participants have access to community resources, and group activities that are held at various service agencies.
- Open Escrow Account: The FSS staff will explain the Mandatory Earned Income Disallowance, Total Tenant Payment and Rent to determine the amount of their monthly escrow account deposit.

FSS Incentives to Encourage Participation

- FSS staff will establish an escrow account for FSS participants when eligible.
- Opportunity to select services that will assist the participant in developing the necessary skills and securing the resources to become self-sufficient.
- Opportunity to develop supportive relationships.
- Opportunity to receive individualized assistance and encouragement.
- Opportunity to save a portion of your rent money in escrow account.

Housing Opportunities for Persons with AIDS (HOPWA)

HOPWA provides rental assistance to individuals and families where a family member is HIV+ or has AIDS. HOPWA program participants lease privately owned apartments and receive a rental subsidy based on their income level and family composition. Marin Housing has designed this program to be flexible and highly client-friendly, with particular attention given to preserving the confidentiality of the participants.

Mainstream Housing Program

This program is a supplemental program to the Housing Choice Voucher program that maintains a focus on persons with disabilities. The Mainstream Housing Program mirrors the Housing Choice Voucher exactly, except for the limitation on eligibility. Eligible applicants must be designated as a low-income family, who's Head or Spouse is a person with disability.

Community Service Requirement

As required by Federal Regulations, MHA ensures that all non-exempt public housing residents perform eight (8) of community service each month. Each resident is made aware of the requirement during lease briefings. Management has set up a data base of all non-exempt residents and tracks their progress in meeting the requirement. Any resident who does not meet the requirement is given an opportunity to catch up. If the resident does not get back on schedule, MHA reserves the right not to renew their lease.

Pet Policy

MHA has adopted a Pet Policy setting the guidelines under which pets will be permitted in public housing. The Policy addresses the type and number of pets allowed by each family residing in public housing. The Policy also includes general rules that each pet owner must follow in keeping a pet. A full copy of the Pet Policy is kept on file at the Authority's Main Office as well as any development offices.

Asset Management

MHA's six (6) public housing properties have been grouped into two (2) Asset Management Projects (AMPs). The AMPs were determined using various factors including proximity, number of units, etc. Each AMP operates as though it is a separate entity with management and maintenance. Each AMP has its own budget which is monitored very closely.

Management continually assesses all properties to determine how to keep operating costs down and extend the property life by addressing capital improvement needs. Also, as some properties begin to reach the end of their useful life, management will need to determine what can be done to help keep the properties affordable for Public Housing Residents.

Substantial Deviation

The Housing Authority of the County of Marin shall define a Substantial Deviation from the Five-Year Agency Plan as follows:

- Any collective change in the planned or actual use of federal funds for activities that would prohibit or redirect the Housing Authority of the County of Marin's strategic goals or mission of sustaining or increasing the availability of decent, safe and affordable housing while promoting self-sufficiency and asset development of families and individuals from being implemented as identified in the five-year plan.

This could include the elimination of or major changes in activities proposed, or policies provided in the agency plan that would affect services or programs provided to residents or participants. This definition does not include budget revisions, changes in organizational structure, changes resulting from HUD-imposed regulations, or minor policy changes.

- Any collective change in the planned or actual use of federal funds as identified in the 5-year plan that exceeds 20% of the Housing Authority of the County of Marin's annual program budget for all combined public housing activities to include the Capital Fund Program.

Significant Amendment

The Housing Authority of the County of Marin shall define a Significant Amendment or Modification to the annual and 5-year plan as follows:

- Changes to the admission policies of organization of the waiting list that will affect a substantial number of applicants (70% or greater)
- Addition of new activities or policies not included in the current Administrative Plan, Admissions and Continued Occupancy Policy or Annual Plan that affect a substantial number of residents or participants (70% or greater) and are not mandated by HUD.
- Changes about demolition or disposition, designation, or conversion activities.

B.2 New Activities

Note: In 2017, Golden Gate Village was placed on the National register of Historical Places. Policies under this designation will be adhered to when completing any of the noted activities.

Hope VI or Choice Neighborhoods

MHA does not plan to apply for a Hope VI or Choice Neighborhood Grant in the upcoming Fiscal Year.

Mixed-Finance Modernization or Development

MHA is currently working with a developer (The Michaels Organization) analyzing modernization and/or redevelopment opportunities at Golden Gate Village. In the upcoming Fiscal Year MHA will continue to pursue Mixed-Finance Modernization and/or Development at the site. More specific details regarding these options will be provided when they become applicable.

Demolition and/or Disposition

There is a possibility that demolition and/or disposition (Section 18) may be a part of the redevelopment plan at Golden Gate Village. Therefore, MHA may pursue demolition and/or disposition in the upcoming Fiscal Year at the site. More specific details regarding these options will be provided if they become applicable.

Designated Housing for Elderly and Disabled Families

MHA does not plan to designate any additional public housing for occupancy by elderly and/or disabled families in the upcoming Fiscal Year.

Conversion of Public Housing to Tenant-Based Assistance

There are no plans to complete a voluntary conversion of Public Housing to Tenant-Based Assistance in the upcoming Fiscal Year.

Conversion of Public Housing to Project-Based Assistance using RAD

Project-Based Vouchers

To expand the availability of affordable housing in Marin County, MHA uses project-based vouchers. The current Annual Contributions Contract with HUD allows MHA to use up to 20% of its voucher program budget authority to attach funding to specific units

rather than using it for tenant-based assistance. PBV assistance may be attached to existing housing or newly constructed or rehabilitated housing. No more than twenty (20%) of the base allocation of housing choice vouchers can be utilized for PBV. MHA is responsible for determining the amount of budget authority that is available for project-based vouchers and ensuring that the amount of assistance that is attached to units is within the amounts available and/or authorized by HUD.

The table below provides information on the apartment complexes which currently have project-based contracts with MHA:

Complex	Units
Fairfax Vestpocket	5
Fireside Affordable Housing Associates	33
Hamilton Continuum Partners I, L.P.	10
Hamilton Continuum Partners II, L.P.	8
Isabel Cook	17
Point Reyes Affordable Homes, L.P.	10
Toussin Senior Apt. L.P.	13
Warner Creek Senior Hsg., L.P.	58
Victory Village	53
Jarrett Bayless under a Partnership Agreement with Joshua Szarek	2
EAH- Piper Court	6
EAH- Edgewater Place	6
EAH- Farley Place	11
Community Land Trust Association of West Marin (CLAM)	2
EAH- Turina House	7
EAH- Drakes Way	6
EAH- San Clemente	19

The implementation of project-based vouchers up to 20% of the Annual Budget Authority will increase the quality of affordable housing and expand housing opportunity to low-income families in Marin County which is consistent with the Agency Plan's Goals and Objectives.

Units with Approved Vacancies for Modernization

At certain times, a PHA may have a need to request the approval from HUD for vacancies in which to complete significant modernization work. At this time, MHA does not have a need to request this approval from HUD. MHA reserves the right to request approval if a need should arise during the upcoming Fiscal Year.

Other Capital Grant Programs

Currently, Marin Housing is not receiving funding through any other Capital Grant Programs such as the Capital Fund Facilities Grants or Emergency Safety and Security Grants. Marin Housing reserves the right to apply for funding through these grants should they become available during the upcoming Fiscal Year.

B.3. Civil Rights Certification

Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations, is submitted as an electronic attachment to the FY2020 Annual Plan. This Form is signed by the Chairman of the Board of Commissioners. Please see the Certification Tab.

B.4 Most Recent Fiscal Year Audit

The most recent Fiscal Year Audit covers FYE December 31, 2019 and is in the process of being finalized.

Assistance Payments (HAP) are abated per regulations. The Authority is working closely with our contractors to track every failed inspection and monitor compliance.

B.5 Progress Report

Goal: Fully Utilize Section 8 and Public Housing Programs

Objective: Achieve and maintain 98% lease-up rate in Public Housing program.

Progress: During the last six months of the reporting period, the Public Housing program maintained a 99% occupancy rate.

Objective: Achieve 98% utilization of funding or vouchers leased for Housing Choice Voucher Program (HCV).

Progress: MHA has vouchers leased at 97% and budget allocation of over 100%.

Objective: Assist 125 Section 8 Voucher holders per year to locate and successfully lease affordable housing.

Progress: MHA was able to house over 100 more HCV families during this period. The LPP assisted in bring on 96 new landlords and increased the family's success in locating a home. MHA continues to partner with local agencies and experts to provide resources to landlords with newsletters and workshops.

Objective: Turn over 100% of all vacant Public Housing units within 20 days of the vacate date.

Progress: During the last six months of the reporting period, Public Housing turned over units within 21 days of the date the unit was turned over to the housing authority, and the new lease effective date.

Goal: Preserve Existing Affordable Housing Stock

Objective: Perform housing quality inspections using the UPCS standards on 100% of public housing units.

Progress: In October 2020, UPCS inspections were conducted in 296 public housing units.

Objective: Perform housing quality inspections using the UPCS standards on 100% of public housing units.

Objective: Work with residents, various agencies, and law enforcement to investigate and implement measures to improve public security through community involvement.

Progress: During the reporting period, the MCSO performed daily patrol of public housing developments, monitored loitering activity, enforced the parking ordinance, responded to resident and staff calls for service, provided reports on special requests and daily reporting logs, and coordinated with MHA on two VAWA cases.

Objective: Perform 40 housing quality control inspections annually using the HQS requirements. Perform housing quality inspections annually using the HQS standards on 100% of units leased through the Section 8 Program.

Progress: MHA staff conducts Quality Control inspections on a quarterly basis in addition to third party contractors conducting Quality Control inspections on a monthly basis.

Objective: Secure annual funding for the Residential Rehabilitation Program through the County of Marin CDBG Program and continue outreach to low-

Progress: Meet 6 times a year with RAB and attend the RC meetings.

Objective: 5 Year: Solicit input from residents as to what procedures or practices are perceived to be confusing and/or burdensome in order to assist in prioritizing areas that would most benefit from improved systems.

Progress: This goal continues to be accomplished through the RAB and RC. RAB meetings are held monthly to keep lines of communication open with participants and staff. MHA management staff attends the RC monthly meetings.

Goal: Concentrate on efforts to improve specific management functions

Objective: Explore methods of automating routine tasks through our client software and payroll systems.

Progress: In 2020 MHA began to utilize Yardi Voyager, a modern management software that is user friendly and provides enhanced features for staff, tenants and landlords. Residents can complete paperwork online and applicants are able to check their status on the waitlist online, in addition to many other upgrades.

Objective: Explore methods of becoming a paperless agency- and reducing file management costs and burden.

Progress: MHA has moved over to more efficient and paperless Property Management software system YARDI, which has reduced file management costs and burden.

Objective: Review eligibility functions including initial application processing and annual re-certification functions.

Progress: Through streamline changes provided by HUD and internal processes MHA has been able to streamline eligibility processes, making the process easier for the clients and employees.

Objective: Increase the efficiency of the management functions for both Public Housing and Section 8 Voucher Program. Through the regular use of tools for statistical measurements and monitoring work functions to ensure high quality and quantity of work. Increase staff communication to resolve problems quickly and efficiently.

Progress: During the reporting period, public housing management implemented equitable work assignments by rotating staff, improving communication through daily meetings, collaborating with the community on

ad-hoc maintenance projects, mixing staff teams to share knowledge, increase motivation, work engagement, and job satisfaction.

The HCV program continues to have staff meetings on a bi-weekly basis where the team discusses processes and any issues and improvements. There is also a monthly report completed by the Program Manager which updates the department and agency on all functions under the program. The HCV Program Manager encourages open communication and input from the team.

Goal: Streamline External Procedures

Objective: Continue to increase the availability of forms and information to MHA's landlords through the use of the website. Improve and simplify procedures and systems for interfacing with Section 8 landlords and utilize MHA's website to provide information to landlords, including downloadable forms. The MHA hotline provides landlords with a tool to advertise for tenants.

Progress: MHA's conversion to Yardi Voyager provides significant improvements to our landlord's ability to interact with the Housing Authority online.

Objective: Implement an interactive web based system. Place the interim reporting form on the web site in such a way that it will become interactive and the residents/participants can access the form from the web site.

Progress: The MHA website has useful information, forms, pamphlets, videos, and links for landlords and clients. There is also a landlord portal where landlords are able to access important data. The Website was updated in 2020 to be ADA compliant.

Objective: Improve the quality of customer service by using the phone tree, thereby providing the receptionist more time to provide "face to face" interaction with our visiting clientele. Also by providing a more customer friendly experience with the phone tree that enables callers to quickly make contact with MHA staff by phone or voicemail. Return calls within 24 hours.

Progress: This goal has been met- we have now contracted with an answering service, calls are answered 24/7.

Objective: Provide translation services to Limited English Persons through telephonic translators and provide critical documents in Spanish and Vietnamese.

Progress: MHA continues to provide translation services through Language Link and employees within the agency who speak multiple languages.

Goal: Continue to Build Collaborations with Other Agencies, Local Jurisdictions and the Private Sector

Objective: Identify key resources and barriers to affordable housing opportunities and develop a strategy for engaging the participation of new landlords and retaining partnerships with existing landlords. Develop a formalized collaborative of stakeholders, including Section 8 landlords, other property managers, commercial realtors, housing non-profit providers, local governments, program participants and MHA.

Progress: MHA continues to conduct workshops, send newsletters, attend conferences, dinners, and outreach to landlords.

Objective: Continue collaboration with Sheriff's Department and other service agencies to monitor and reduce drug activity by having at least quarterly safety meetings in Marin City during the year. Sustain ongoing collaboration with the Marin County Sheriff, the Marin City residents, the County Office of Drugs and Alcohol), Phoenix Program, Performing Stars, school district and the Marin City public housing residents to sustain the fight against drugs in Marin City.

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Objective: Continue collaborations with Marin Abused Women Services, CalWORKs, H&HS, Golden Gate Regional Centers and the Veterans Administration to provide affordable housing for specific populations with critical housing needs.

Progress: Currently in process- ongoing. Developed partnership with. MHA staff continues to work with providers to assisting specific populations including chronically homeless individuals to partner to find affordable housing opportunities.

Objective: Continue participation and leadership in the Marin Partnership to End Homelessness, Homeless Policy Steering Committee, and countywide efforts to end homelessness.

Progress: MHA is the Coordinated Entry provided through a county partnership. MHA works in collaboration with a team of Community Based Organizations to collectively address chronic homelessness in Marin with a goal to end chronic homelessness in 2022.

Goal: Access additional resources for new affordable housing developments and for the rehabilitation/ modernization of existing MHA housing stock

Goal: Explore ways to improve energy efficiency for public housing

Objective: Utilize the new Green Energy Efficiency Grant from HUD Stimulus award to educate residents in conservation efforts. Access, plan and implement energy efficiency improvements throughout Marin Housing's apartment communities and central office, Review resident based utility payments and increase tenant participation in determining resident contributions toward utilities. Explore additional funding sources for moderate renovations to increase energy efficiency and conservation as well as environmental quality improvements. Examples include achieving significant reduction in utility consumption through the implementation of water conservation measures, lighting retrofits, selective heating boiler and domestic hot boiler replacements, refrigerators, stoves and setback thermostats as part of a holistic effort to reduce energy and water consumption throughout MHA's communities. The goal will be to decrease the utility costs for the properties and Residents and Marin Housing to insure sustainability of the public housing program under asset management.

Progress: MHA continues to pursue energy efficiency upgrades in its capital planning process.

Goal: Undertake efforts to increase accessibility throughout Marin Housing

Objective: Continue to identify barriers to accessibility and make improvements to increase Uniform Federal Accessibility Standards (UFAS) at residential units as well as identify efforts to increase accessibility standards at all Marin Housing sites including the Marin Housing Central Office.

Progress: MHA continues to identify opportunities to increase the accessibility at all Marin Housing sites during the course of capital planning processes.

Goal: Conduct community meetings and trainings to present increased economic opportunities for low income residents

Objective: Conduct community meetings to present job trainings in collaboration with other economic development organizations to expand access to and increase employment opportunities for low income residents and qualified minority or small business concerns in general construction trades including carpenters, labors, electricians, plumbers, and mechanical trades.

Progress: MHA has been able to have 2 residents hold temporary positions as on-job training over the year- one has been employed as an extra hire in our HCV program and one employed as a temporary employee in maintenance..

Objective: Thirty-percent of all new hires annually will be Section 3 residents. MHA will announce job openings to our participants through mailings, newsletters and case managers to increase resident employment opportunities.

Progress: This goal was met.

Objective: Hire at least one MHA Section 3 Fellow per year to participate in the Section 3 employment and training program.

Progress: This goal was met in 2020.

B.6 Resident Advisory Board Comments

To be added once the Resident Advisory Board has had a chance to review the Plan and offer comments.

B.7 Certification by State or Local Officials

The Housing Authority of the County of Marin submitted Form HUD-50077 SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, to the appropriate local official for their signature. The signed form is being submitted to HUD as an electronic attachment to the FY2020 Annual Update. Please see the Certifications Tab.

B.8 Troubled PHA

The Housing Authority of the County of Marin is ***not*** a Troubled PHA. Therefore, this section is not applicable.

A. Statement of Capital Improvements

C.1 Capital Improvements

The 2018 Capital Fund Five-Year Action Plan was submitted to HUD using the Energy Performance Information Center (EPIC) as required.

The Capital Fund Five-Year Action Plan covering the years FY2020 – FY2023 will be discussed in the same Public Hearing as the FY2020 Agency Plan Annual Update. A copy of the FY2020 – FY2023 Capital Fund Five-Year Action Plan will be available for review during the 45-day Public Hearing notice period.

STRATEGY STATEMENT

To ensure that Capital Fund Program (CFP) funding is effectively and efficiently utilized, a clear and appropriate set of program priorities, goals and objectives was developed to serve as a guide in determining the specific work items and target sites that will be included in the CFP Plans. These program priorities, goals and objectives were discussed at RAB meetings and used to develop this year's plans.

PRIORITY ONE: MANDATORY PHYSICAL & MANAGEMENT IMPROVEMENTS

- a) Lead Based Paint (LBP) abatement, if needed.
- b) Asbestos Containing Material (ACM) abatement activities, if needed.
- c) Biological growth abatement, if needed.
- d) Modification of apartments and common areas for use by disabled to comply with ADA and/or 504 requirements.
- e) Emergency improvements to abate health and safety issues.
- f) Management improvement activities required by legal settlement, HUD audit finding, or identified by HUD's PHAS.
- g) Completion of comprehensive modernization activities funded through CFP.

PRIORITY TWO: URGENT PHYSICAL & MANAGEMENT IMPROVEMENTS

- a) Emergency repairs such as chronic malfunctioning elevators, correction of hazardous conditions, etc.
- b) Identification and proper abatement of potentially toxic materials and unhealthy conditions. Specific activities would include testing and abatement of asbestos, lead, biological growth, repair/replacement/installation of ventilation systems, etc.
- c) Improvements that will enhance the security of residents. Such activities would include installation of vandal resistant security lighting, security grills, surveillance equipment, gates, etc.
- d) Control of criminal activities. Such activities may include continuation of the successful public safety program of expanded patrols of Marin County Sheriff's Departments or police officers for city jurisdictions at selective MHA sites that have known criminal activities.

PRIORITY THREE: SERIOUS PHYSICAL & MANAGEMENT IMPROVEMENTS

- a) Major repairs to heating, plumbing, sewer, electrical systems, etc.
- b) Physical improvements to non-dwelling space for the expansion or improvement of resident activities and services and MHA management operations.
- c) Improvements to MHA management operations to improve efficiency and the delivery of services to residents.

Remaining physical and management improvements are those that are addressed based on the severity of the problem, the efficiency of addressing the problem along with other more urgent items or on the cost savings that will result from completing the improvement.

- a) Management Issues - timely street cleaning, tree pruning, sidewalk repair,

anti-vandalism strategies, appropriate trash collection system, proper cleaning of site, on-site security, site resident monitors, neighborhood programs to monitor loitering, recycling programs for each site, and graffiti abatement, among others.

- b) Maintenance Issues- cleanup of playground facilities, improved preventative maintenance programs for elevators and boilers, well maintained doors and windows, proper graffiti abatement, addition of weather stripping on all doors, addition of handrails to dangerous areas/ areas with seniors, timely maintenance response, general unit improvements.
- c) Self-Sufficiency Issues - family planning services, senior care services, age-specific programs for children, resident-owned businesses, social service programs, computer resource centers at all family developments and some senior developments, on-site activities/ programs for the senior developments, Resident Council (RC) monitoring and coordination, RC elections process, resident involvement in the expenditure of programs such as educational incentives and neighborhood watch, etc., and transportation arrangements for seniors, among others.

CAPITAL FUND PROGRAM PLANS FOR FY 2021

The agency goals outlined below focus on completion of capital improvements in progress, urgently needed work, mandated improvements and possible future/ long-term needs:

- The 2017 designation of Golden Gate Village on the National Register of Historic Places has created new planning consideration that impact MHA's ability to timely expend capital funds as well as MHA's ability to perform many maintenance type activities. Accordingly, most exterior projects at Golden Gate Village will now require additional planning time, in addition to funding to pay for a historic preservation consultant.
- Considering the ongoing revitalization planning process, the focus of capital expenditures at Golden Gate Village remains addressing health and safety related deficiencies as they come up. An emerging high priority project is work on the defensible fire break around the property. This project is complicated by historic designation requirements and is in its preliminary phases. Other priorities include addressing original and replacement balcony screens which have suffered damage over the years due to spalling, repairing or replacing compromised sewer laterals and water lines, and site concrete.
- Management Improvements (MI) activities will include feasibility studies, public housing revitalization studies and the continuation of a resident

employment/economic self-sufficiency program.

Per HUD recommendation, MHA conducted physical needs assessment in 2020 for the Golden Gate Village housing developments. The additional 5 senior properties will have a PNA in the early 2021 (Postponed due to COVID-19) The Physical Needs Assessment was completed by AEI, and the findings were presented to the Community Working Group and Board of Commissioners Development Committee on the RAB.

With a CFP allocation of less than \$800,000 and the potential for a drastically reduced allocation in the near term, MHA is unable to fully address the Golden Gate Village short- and long-term needs through the program alone. The extent of deterioration to basic infrastructure, the inherent challenges of existing site plans, and the obsolescence of building designs at Golden Gate Village would make extensive repairs at these communities an ineffective long-term strategy. The 2020 PNA suggested a total of \$90,000,000 in immediate repairs for GGV.

To this end, MHA, as part of a community process, feasibility analysis has been completed and adopted by MHA's Board as explained above with a goal to work preservation and/or revitalization of affordable housing at Marin City that is aligned with MHA's Five Year Annual Plan. The strategy should align with goals of the County of Marin's Consolidated Plan that identifies a serious shortage of affordable housing opportunities and a need to maintain a stock of housing for very low-income households.

Due to the dwindling CFP allocation and mounting capital needs at MHA's AMP II properties, MHA has started exploring the possibility of revitalizing its AMP II properties using programs like RAD, as well as other programs.

RESIDENT HIRING

MHA will continue to endeavor, and in some contracting opportunities require that Public Housing residents be hired as part of the on-site work, be provided training opportunities and be provided the opportunity to acquire job experience in either building trades, landscaping, administrative/ clerical positions, and other fields. The goal will be to assist these residents to become self-sufficient, so that they can move on to jobs outside of MHA. MHA endeavors to contract with Section 3 businesses, and requires all contractors to comply with Section 3 federal requirements.