

Public Housing Agency of the City of Saint Paul

PHA Plan for FFY 2011

(PHA FY 2012)

Attachments to Agency Plan, Version 1

Note: All of the documents created in MS-Word are combined in a single file, and the two Capital Fund budgets (Attachments G and H) are Excel workbooks in separate files.

- Attachment A. Membership of the Resident Advisory Board
- Attachment B. Comments on Agency Plan and PHA Responses
- Attachment C. PHA Management Organizational Chart
- Attachment D. Officer in Residence Program
- Attachment E. Violence Against Women Act Amendments of 2005
- Attachment F. Pending Disposition Activities [None]
- Attachment G. Capital Fund Program Annual Statements/Performance and Evaluation Reports for FFY 2008- 2010 and FFY 2011 Capital Fund Annual Statement (Application) (Excel file)
- Attachment H. Capital Fund Program 5-Year Action Plan (Excel file)
- Attachment I. Update: Policy Changes
- Attachment J. Possible “Moving To Work” Application
- Attachment K. Possible Emergency Medical Technician (EMT) Program
- Attachment L. Section 8 Voucher Policy Changes Under Consideration: “Shopping Period”, Cost Reduction Measures, Fire Safety
- Attachment M. Housing Needs; Excerpts from the City of Saint Paul, Minnesota Consolidated Plan and Submission 2005 - 2009 (PDF)
- Attachment N. Concept: Housing for Homeless Veterans

MEMBERSHIP OF THE RESIDENT ADVISORY BOARD

The following resident leaders were designated by the PHA Board of Commissioners on July 28, 1999 as the PHA's Resident Advisory Board (RAB):

- All members of the Hi-Rise Presidents Council (16 members, comprised of the president of each hi-rise).
- All members of the Family Residents' City-Wide Residents Council (16 members, including the four officers from each of the four family housing developments).
- The two PHA Commissioners who are residents of public housing (currently Harold Purtell and Maria Manzanares).
- Section 8 representatives who volunteered for the RAB in response to mailings and flyers in the Rental Office.

The Resident Advisory Board membership has fluctuated due to changes in officers, residents moving out of public housing or leaving the Section 8 program, etc. Some public housing resident leaders who are not currently members of the Presidents Council or CWRC have participated actively in the RAB meetings.

PHA staff mailed RAB meeting agendas to all of the RAB members listed above. Mailings have also been sent to Southern Minnesota Regional Legal Services, Inc. (SMRLS) and the Community Stabilization Project. These are tenant advocacy agencies that asked to be kept informed of the Agency Plan development.

SUMMARY OF COMMENTS ON AGENCY PLAN AND PHA RESPONSES

RAB Comments

The PHA **Resident Advisory Board** (RAB) met four times in August and September 2010 to discuss the Agency Plan requirements and drafts and other policy issues. Dave Lang, PHA Construction Programs Manager, talked to the Resident Advisory Board about the PHA process and timeline for developing the Capital Fund Program budget. The RAB did not submit any written comments on the draft Plan. Staff responded to RAB members' oral comments during the meetings.

Resident Comments on Capital Fund Needs

PHA staff attends Resident Council meetings in all hi-rises and family developments to describe the Capital Fund planning process and receive resident comments on capital planning needs. The residents did not submit written comments.

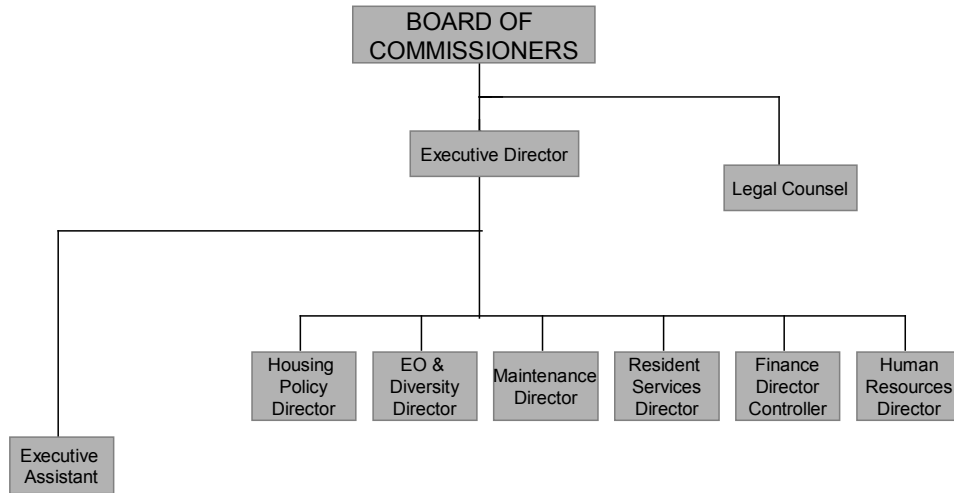
Comments from the Public Hearings

The Agency Plan Public Hearing was held on November 16, 2010, at Neill Hi-Rise, 325 Laurel Avenue in St. Paul. No written comments were submitted.

ATTACHMENT C to Saint Paul PHA Agency Plan for PHA FY2012 (FFY 2011)

PUBLIC HOUSING AGENCY OF THE CITY OF SAINT PAUL

BOARD APPROVED ORGANIZATIONAL CHART



Revision Approved 8/24/2005

Officer In Residence Program

HUD and the PHA's Board of Commissioners have approved the plan for the **Officer In Residence Program** that currently allows one Saint Paul Police Department officer to live in each of the PHA's hi-rise apartment buildings, and at one of the PHA's family housing developments. Each of the PHA's sixteen's hi-rises has an Officer In Residence, aside from short-term vacancies due to normal turnover. With the PHA Board's approval, two officers currently live at Central and Edgerton Hi-Rises. The PHA may consider adding more Officers in Residence in the future to further increase security for residents and staff.

Each Officer in Residence makes a one year commitment to the program initially, schedules office hours for resident contact, attends resident council meetings and get-togethers when possible, and provides information and assistance to staff and residents related to illegal activity in and around the development. The officer also parks a police squad car in an assigned space in front of the building during off-duty hours. In exchange for making these commitments, the Officers in Residence do not pay rent to the PHA. Each officer signs a special lease with the PHA (copies are available).

The PHA staff and Commissioners believe that this arrangement is needed to improve security for residents and staff, complementing the successful ACOP community policing program.

Under the Public Housing Reform Act of 1998 (QHWRA), the PHA receives operating subsidy for all dwelling units rented to law enforcement officers.

Violence Against Women Act Amendments of 2005

On April 25, 2007 the PHA Board of Commissioners approved a Policy on Protections for Victims of Domestic Violence (“VAWA Policy”) and related amendments to the PHA’s Admission and Occupancy Policies for the Public Housing Program and the Section 8 Housing Choice Voucher Program. The policies are posted on the PHA’s Internet website, www.stpaulpha.org.

The PHA adopted these policies in compliance with the Violence Against Women Act (VAWA) Amendments of 2005. The Act also requires the PHA to describe in the Agency Plan any goals, objectives, policies or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault or stalking. (Sec. 603).

- The PHA supports the goals of the VAWA Amendments and will comply with its requirements.
- The PHA will continue to administer its housing programs in ways that support and protect residents (including Section 8 Housing Choice Voucher program participants) and applicants who may be victims of domestic violence, dating violence, sexual assault or stalking.
- The PHA will not take any adverse action against a resident/participant or applicant solely on the basis of her or his being a victim of such criminal activity, including threats of such activity. “Adverse action” in this context includes denial or termination of housing assistance.
- The PHA will not subject a victim of domestic violence, dating violence, sexual assault or stalking to a more demanding standard for lease compliance than other residents.
- The PHA will continue to develop policies and procedures as needed to implement the requirements of VAWA, and to collaborate with other agencies to prevent and respond to domestic violence, dating violence, sexual assault or stalking, as those criminal activities may affect applicants for and participants in the PHA’s housing programs. The PHA cooperates with St. Paul area public and non-profit agencies that provide activities, services and programs to assist and support victims of domestic violence. (See attached list of agencies or go to the website for Minnesota Coalition for Battered Women - <http://www.mcbw.org>)
- The PHA’s VAWA Policy states that “The PHA will provide notices explaining the VAWA protections to applicants for housing assistance (both Section 8 Housing Choice Vouchers and Public Housing), to public housing residents and Section 8 voucher participants, and to property owners participating in the voucher program.”
- The PHA has provided VAWA training to its staff, and to other housing agencies through the Minnesota Chapter of NAHRO.

ATTACHMENT E to Saint Paul PHA Agency Plan for PHA FY2012 (FFY 2011)

[Minnesota Coalition for Battered Women](#)

Minnesota Services Search

Search by Shelter Name, City or County

St Paul	Submit
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Search	Name	Business Phone	Crisis Line	Area Served
	St. Paul Intervention Project	651-645-2824	651-645-2824	Ramsey County
	Jewish Domestic Abuse Collaborative - Jewish Family Services of St. Paul	651-698-0767		Hennepin, Ramsey Counties
	Breaking Free	651-645-6557	651-645-6557	Ramsey County
	Casa de Esperanza	651-646-5553	651-772-1611	Hennepin, Ramsey Counties
	CSD of MN Deaf Domestic Violence Program	651-487-8867 (TTY)	dvhelp@skytel.com (crisis e-mail/pager)	Hennepin, Ramsey Counties
	Minnesota Network on Abuse in Later Life	651-636-5311		Statewide
	Praxis International	651-525-0487		National
	Southern Minnesota Regional Legal Services	651-228-9823		Southern Minnesota
	Women of Nations	651-251-1603	651-222-5836	Hennepin, Ramsey Counties
	Women's Advocates	651-227-9966	651-227-8284	Statewide
	Wilder Foundation - Violence Prevention and Intervention Services	651-280-2310		Ramsey, Anoka, Dakota, Washington
	Bridges to Safety	651-266-9901	651-266-9901	Ramsey County

Minnesota Coalition for Battered Women
 590 Park Street, Suite 410, St. Paul, MN 55103
 Voice: (651) 646-6177 or (800) 289-6177
 Fax: (651) 646-1527

Pending Disposition Activities

The disposition only activity underway or contemplated when this Plan was written was the sale of one scattered site public housing home to the City of Saint Paul, to accommodate widening Maryland Avenue (at Rice Street) for public safety reasons. The City initially proposed to take most of the home's front yard by eminent domain, if the PHA did not agree to convey it. The PHA countered that the house would be rendered unsuitable for a family residence, and after some negotiations the City agreed to purchase the house for its appraised value.

It is a three-bedroom, single family home. The PHA submitted a disposition application to HUD's Special Applications Center on November 2, 2010 and the disposition will probably occur near the end of the current PHA Fiscal Year or the new year that begins April 1, 2011.

The PHA is considering using the sales proceeds from this house along with other Replacement Housing Funds from HUD (from past sales of scattered site homes), to purchase or construct a multi-family public housing rental property to house homeless veterans. The PHA's Board has given concept approval to explore this possibility.

On September 16, 2010 the PHA's Resident Advisory Board discussed and approved of the sale of the home and the proposed development of housing for homeless veterans, or other veterans.

6. Demolition and Disposition

[24 CFR Part 903.12(b), 903.7 (h)]

Applicability of component 6: Section 8 only PHAs are not required to complete this section.

See above; no other pending disposition activities or plans.

- a. Yes No: Does the PHA plan to conduct any demolition or disposition activities (pursuant to section 18 or 24 (Hope VI) of the U.S. Housing Act of 1937 (42 U.S.C. 1437p) or Section 202/Section 33 (Mandatory Conversion) in the plan Fiscal Year? (If "No", skip to component 7; if "yes", complete one activity description for each development on the following chart.)

ATTACHMENT G-H to Saint Paul PHA Agency Plan for PHA FY2012 (FFY 2011)

Attachments G and H to the Agency Plan are Excel Spreadsheets in separate files.

Attachment G. Capital Fund Program Annual Statements/Performance and Evaluation Reports for FFY 2008- 2010, including FFY 2011 Capital Fund Annual Statement (Application)

Attachment H. Capital Fund Program 5-Year Action Plan

UPDATE: POLICY CHANGES

Since the PHA submitted its last Annual Plan the PHA's Board of Commissioners approved amendments to the PHA's Admission and Occupancy Policies for the Public Housing Program and the Section 8 Housing Choice Voucher Program as summarized below. The complete policies are posted on the PHA's Internet website, www.stpaulpha.org.

5/27/09 and 8/26/09 - The PHA amended its Purchasing Policy twice to conform to the requirements of the Recovery Act and HUD guidance.

During the past year the PHA amended its Public Housing Admission & Occupancy Policies as follows:

- 8/26/09 – Revised requirements for public housing applicants to produce housing history; revise housing history requirements for “lease-on” applicants; authorize suspending applications long enough for applicant to accrue housing history.
- 12/16/09 - Revised the Public Housing Dwelling Lease for Hi-Rises, Family Developments and Scattered Sites. The revision revises and clarifies definitions of “criminal activity” and “drug-related criminal activity.” Possession of even small amounts of marijuana and other controlled substances is a serious violation of the lease and can be grounds for lease termination. The revision also incorporates lease addendums and policies that were approved since the last lease revision, including VAWA provisions, transfers from fire-damaged units, a prohibition on (new) dogs in scattered site homes. A 25-lb. weight limit on (new) dogs in hi-rise units is also added to the hi-rise lease. Resident comments on the weight limits and other lease changes are being accepted through January 21, 2010, to be considered by the Board of Commissioners at their January 27, 2010 meeting.
- 7/28/10 – The following revisions were approved for both Public Housing and Section 8 Housing Choice Vouchers:
 - A. HUD's Enterprise Income Verification (EIV) online system must be used at each annual and interim income recertification, and after a new household is admitted to public housing or becomes a voucher participant, to determine if applicants and participants have accurately reported all income sources.
 - B. Debts Owed by Vacated Tenants/Participants; Terminations for Cause:
 - 1. Staff must enter information into EIV on debts owed to the PHA and terminations for cause after public housing residents and Section 8 participants end their participation in the programs.
 - 2. Before approving an applicant for public housing or Section 8, staff must check the EIV database to determine if the applicant owes money to a PHA or was

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terminated for cause from public housing or Section 8. If money is owed, the PHA will require an applicant to pay off the debt or sign a payment agreement (and keep making the payments) before approving the application.

- C. Social Security Numbers are now required for all household members, with few exceptions. Previously children under the age of six did not need to provide Social Security numbers.
- D. The Section 8 subsidy ends in the month a tenant dies. According to new HUD guidance, if the sole member of a household dies, the unit is not eligible for a voucher subsidy the following month.
 - 1. Clarify when minors can be added (Lease-on) to a household that currently resides in public housing or has a Section 8 voucher. The policies now specify what proof is required to show that an adult in the household has legal custody of the child.
 - 2. Pet deposits (Public Housing Only): A resident does not have to pay a pet deposit for a service animal, companion animal, therapy animal, etc. However, the animal must have the same evidence of licensing and vaccinations that the PHA requires for a pet.

During the past year the PHA amended its Admission & Occupancy Policies for the Section 8 Housing Choice Voucher Program as follows:

- 12/16/09 – Revised the Admission & Occupancy Policy (Administrative Plan) for the Section 8 Housing Choice Voucher Program: See Attachment L: Egress Windows; Extensions of Voucher “Shopping Period”; Cost Reduction Steps; Other.
- 7/28/10 – See above.

POSSIBLE APPLICATION FOR “MOVING TO WORK” STATUS?

PHA staff and the Resident Advisory Board have discussed the possibility that the PHA may be able to apply to HUD to participate in the “Moving to Work” (MTW) program. A PHA approved for MTW has more flexibility in managing its HUD funding, with some latitude to streamline the current income and rent calculations in the public housing and Section 8 voucher programs, and other benefits. The details would be stated in a MTW Plan which would be developed with extensive involvement of PHA residents, stakeholders and the community.

If the PHA receives preliminary HUD approval to pursue Moving To Work status, the Resident Advisory Board will be reconvened to discuss it.

If the PHA is permitted to apply for MTW, we will post information on the PHA’s Internet website, www.stpaulpha.org.

Under Consideration: Emergency Medical Technicians

When this Plan was drafted the PHA was considering a possible program to house Emergency Medical Technicians (EMT's) in one or more public housing hi-rises, similar to the Officer In Residence Program (See Attachment D, above). PHA staff have had preliminary discussions with officials from the Saint Paul Fire Department, which trains and employs EMT's.

Such a program would have to be approved by the PHA's Board of Commissioners and HUD before being implemented.

Section 8 Vouchers Policy Changes

Egress Windows; Extensions of Voucher “Shopping Period”; Cost Reduction Steps; Other

On December 16, 2009 the PHA Board approved the following staff recommendations to revise the Admission and Occupancy Policies for the Section 8 housing Choice Voucher Program.

1. Egress Windows; add City Standard to Housing Quality Standards. Staff recommended that the PHA incorporate the City of Saint Paul’s standards for emergency escape (egress) windows in sleeping rooms into the Housing Quality Standards (HQS) used for Section 8 voucher inspections. The Board approved, so staff will submit the request to HUD’s Minneapolis Field Office for approval.
2. Limit Extensions of “Shopping Time”. Staff believes that a modest reduction in the “shopping time” allowed for a voucher holder to select a rental unit would promote better management of available vouchers, without unduly restricting a voucher holder’s housing choices.

The PHA’s current policy allows 60 days for a voucher holder to locate a unit, with a 30 day extension possible at the discretion of the PHA. A person with a disability may be allowed 30 days if needed as a reasonable accommodation, if the disability prevented the person from securing a unit within the time allowed. The Board approved changing the language to clarify that either type of extension can be for up to 30 days.

3. Cost-Saving Measures. At times when the number of vouchers under lease or the cost of those voucher subsidies is higher than authorized by the PHA’s Annual Contributions Contract with HUD for a calendar year, the PHA has had to suspend issuing new vouchers, limit “shopping time” and impose other temporary measures. As directed by HUD in notices to all PHA’s, staff is recommending Board approval of the following list of cost-reduction measures that could be taken when necessary:
 - a. Stop issuing new vouchers to families on the waiting list.
 - b. Cancel outstanding vouchers held by applicants who are searching for housing but have not yet submitted a Request for Lease Approval. When the PHA is able to issue new vouchers again, these families would receive a voucher and the full 60-day shopping time.
 - c. Stop issuing vouchers to families moving out of units assisted with Project-

ATTACHMENT L to Saint Paul PHA Agency Plan for PHA FY2012 (FFY 2011)

Based Vouchers (PBV). When the PHA is able to issue new vouchers again, these families would receive a voucher.

- d. Stop approving new families moving into vacant units in projects with Project-Based Vouchers (PBV), until the PHA is able to issue new vouchers again.
- e. Stop approving moves to higher-cost units, unless the move was required by the PHA (for example, to comply with occupancy standards).
- f. Stop approving moves (“port-outs”) to higher-cost jurisdictions, if the PHA has insufficient funds for continued assistance.
- g. Reduce Payment Standards for all or some unit sizes. For tenant-based vouchers, a lower payment standard applies immediately to all new admissions, all movers, and families remaining in their units with a new HAP contract (e.g., when the owner offers or requires a new lease). For all other voucher participants, decreased payment standard amounts are not applied until the second regular reexamination after the payment standard is lowered (24 CFR Sec. 982.505(c)(3)). The PHA may request a HUD regulatory waiver to implement the reduced payment standard sooner.
- h. Cancel vouchers currently under lease and cancel the associated Housing Assistance Payments (HAP) contracts. HUD regulations (24 CFR 982.454) provide that a PHA may terminate HAP contracts if the PHA determines that funding under the CACC is insufficient to support continued assistance for families in the program. Only as a last resort would the PHA consider withdrawing or canceling vouchers that are currently being used by families. If the PHA has to reduce the number of vouchers under lease, staff proposes cancelling the vouchers for which the lowest subsidy (Housing Assistance Payment) was being paid, to limit the negative impact on participants. If the PHA has to reduce subsidy spending, staff would recommend another method, again with the goal of minimizing the negative impact on participants and avoiding disparate

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impact on any protected class.

- i. Take other cost-saving measures that are consistent with the above actions, if required by particular future circumstances in the future.
4. Waiting List Priority for Special Purpose Allocations. The revision clarifies that applicants who are eligible for any special-purpose allocations of vouchers have priority on the waiting list. Although this may be implicit, to allow the special allocations to be fully utilized, it will now be stated explicitly in the policies. Recent examples of special allocations are the 100 Family Unification Program (FUP) vouchers and the 35 Veterans Administration - Supportive Housing (VASH) vouchers.
5. Reviewing Disability Status. Staff recommended that the policies state that the PHA may review a participant's disability status during their participation in the voucher program, if there is reason to believe that the participant is no longer a person with a disability as defined in applicable federal laws and regulations. The Board approved this change.
6. Project-Based-Voucher (PBV) Projects; Records Retention. The revised policy states that the "project file" for any new PBV project must contain the inspection reports demonstrating that every subsidized unit passed an HQS inspection before the PHA executed the Housing Assistance Payments contract with the property owner. Inspection reports will be retained in the project file throughout the duration of the contract and for at least three years thereafter. "Subsidy layering reviews" will also be retained.

ATTACHMENT M to Saint Paul PHA Agency Plan for PHA FY2012 (FFY 2011)

The attached excerpts from the City of Saint Paul's Consolidated Plan for 2005 – 2009 illustrate many facets of the housing needs in the community, in addition to the data shown in the attached Agency Plan.

Development Concept: Public Housing for Homeless Veterans

As this plan was being developed, PHA staff began considering possibilities for developing new public housing for homeless veterans in a new or rehabilitated multi-unit building, using existing public housing resources to leverage other funds. We have begun discussions with staff from the local and national offices of the Corporation for Supportive Housing (CSH), which has launched initiatives at the national and Minnesota levels to create housing with supportive services for homeless veterans.

At a Resident Advisory Board (RAB) meeting on September 16, 2010 staff discussed the pending disposition this property and the proposed concept of developing a new multi-unit building for homeless veterans, or other veterans, using the proceeds from this sale and other available public housing resources to leverage other funds. The RAB members supported the sale and the concept for developing new housing, especially if it targeted veterans.