

5-Year PHA Plan (for All PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

OMB No. 2577-0226
Expires: 02/29/2016

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

Applicability. Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

A.	PHA Information.																																				
A.1	PHA Name: _____ PHA Code: _____																																				
	PHA Plan for Fiscal Year Beginning: (MM/YYYY): _____ PHA Plan Submission Type: <input type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission																																				
	<p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p>																																				
	<input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) <table border="1" data-bbox="191 1308 1451 1936"> <thead> <tr> <th data-bbox="191 1308 399 1381" rowspan="2">Participating PHAs</th> <th data-bbox="399 1308 524 1381" rowspan="2">PHA Code</th> <th data-bbox="524 1308 807 1381" rowspan="2">Program(s) in the Consortia</th> <th data-bbox="807 1308 1123 1381" rowspan="2">Program(s) not in the Consortia</th> <th colspan="2" data-bbox="1123 1308 1451 1346">No. of Units in Each Program</th> </tr> <tr> <th data-bbox="1123 1346 1273 1381">PH</th> <th data-bbox="1273 1346 1451 1381">HCV</th> </tr> </thead> <tbody> <tr> <td data-bbox="191 1381 399 1499">Lead PHA:</td> <td data-bbox="399 1381 524 1499"></td> <td data-bbox="524 1381 807 1499"></td> <td data-bbox="807 1381 1123 1499"></td> <td data-bbox="1123 1381 1273 1499"></td> <td data-bbox="1273 1381 1451 1499"></td> </tr> <tr> <td data-bbox="191 1499 399 1646"></td> <td data-bbox="399 1499 524 1646"></td> <td data-bbox="524 1499 807 1646"></td> <td data-bbox="807 1499 1123 1646"></td> <td data-bbox="1123 1499 1273 1646"></td> <td data-bbox="1273 1499 1451 1646"></td> </tr> <tr> <td data-bbox="191 1646 399 1793"></td> <td data-bbox="399 1646 524 1793"></td> <td data-bbox="524 1646 807 1793"></td> <td data-bbox="807 1646 1123 1793"></td> <td data-bbox="1123 1646 1273 1793"></td> <td data-bbox="1273 1646 1451 1793"></td> </tr> <tr> <td data-bbox="191 1793 399 1936"></td> <td data-bbox="399 1793 524 1936"></td> <td data-bbox="524 1793 807 1936"></td> <td data-bbox="807 1793 1123 1936"></td> <td data-bbox="1123 1793 1273 1936"></td> <td data-bbox="1273 1793 1451 1936"></td> </tr> </tbody> </table>						Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																						
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B.	5-Year Plan. Required for all PHAs completing this form.
B.1	Mission. State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years.
B.2	Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years.
B.3	Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.
B.4	Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities 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.
B.5	Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.
B.6	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the 5-Year PHA Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
B.7	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>

Instructions for Preparation of Form HUD-50075-5Y

5-Year PHA Plan for All PHAs

A. PHA Information [24 CFR §903.23\(4\)\(e\)](#)

- A.1** Include the full **PHA Name**, **PHA Code**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table.

B. 5-Year Plan.

- B.1 Mission.** State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years. ([24 CFR §903.6\(a\)\(1\)](#))
- B.2 Goals and Objectives.** Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years. ([24 CFR §903.6\(b\)\(1\)](#)) For Qualified PHAs only, if at any time a PHA proposes to take units offline for modernization, then that action requires a significant amendment to the PHA's 5-Year Plan.
- B.3 Progress Report.** Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. ([24 CFR §903.6\(b\)\(2\)](#))
- B.4 Violence Against Women Act (VAWA) Goals.** Provide a statement of the PHA's goals, activities 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. ([24 CFR §903.6\(a\)\(3\)](#))
- B.5 Significant Amendment or Modification.** Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.
- B.6 Resident Advisory Board (RAB) comments.**
- (a) Did the public or RAB provide comments?
 - (b) If yes, submit comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. ([24 CFR §903.17\(a\)](#), [24 CFR §903.19](#))

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year PHA Plan. The 5-Year PHA Plan provides the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average .76 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

HOUSING AUTHORITY OF GLOUCESTER COUNTY

Index of Attachments for 5-Year Plan HUD-50075-5Y

B.1 Mission Statement.-See attached Mission Statement.

B.2 Goals and Objectives.- See attached Goals and Objectives for the next 5 years.

B.3 Progress Report on meeting the goals and objectives in the FY2015 5-Year Plan.-
See attached Progress report on prior 5-year goals.

B.4 Violence Against Women Act (VAWA) Goals. -See attached Violence Against Women Act Policy and Emergency Transfer Plan containing HAGC's Goals to enforce and implement VAWA protections.

B.5 Significant Amendment or Modification. -See attached definition of Significant Amendment or Modification

B.6 Resident Advisory Board (RAB) comments. See attached letter from the RAB to the HAGC Board of Commissioners containing comments of the RAB.

HOUSING AUTHORITY OF GLOUCESTER COUNTY

MISSION STATEMENT

FIVE YEAR PLAN

The Mission of the Housing Authority of Gloucester County is to provide quality affordable housing opportunities to those not served adequately by private/unsubsidized organizations in Gloucester County.

The philosophy of the Housing Authority of Gloucester County is that housing for the elderly will generally be provided in concentrated multifamily settings to allow economies of scaled in the operation of the development and provision of services. Housing for families, particularly those with children, will be provided in a non-concentrated basis and shall, to the maximum extent possible, remain invisible to the community in which it is located. Housing for the disabled will, to the maximum extent possible, meet the needs of the individual's particular disability.

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HOUSING AUTHORITY OF GLOUCESTER COUNTY

FIVE-YEAR GOALS

Goal One: Preserve the economic vitality of HAGC.

Objectives:

1. Preserve the Housing Authority's Public Housing units located at Deptford Park Apartments and Carino Park Apartment through successful completion of the conversion from designation as Public Housing Units to Project-Based Vouchers through the Rental Assistance Demonstration Program. On May 10, 2019 HUD approved HAGC's Significant Amendment for the RAD Program to convert these AMPs from Public Housing under the Rental Assistance Demonstration (RAD) Program to Project-Based Vouchers (PBV). HAGC submitted this application to HUD on August 22, 2018, was approved on December 11, 2018 and accepted the Commitment to Enter into Housing Assistance Payments Contract on January 3, 2019. HAGC works to implement the conversion in accordance with HUD regulations and applicable notices including PIH 2012-3, Rev-3 and any subsequent notices.
2. Successful completion of the disposition of 62 scattered site public housing single family homes in accordance with Section 18 of the U.S. Housing Act of 1937, 24 CFR part 970 and PIH Notice 2018-04 on the basis that it is in the best interest of the residents and HAGC and consistent with the goals of HAGC to do so. Specifically, the units are scattered site units with large distances between the units, lack uniformity of systems, and are unsustainable to operate and maintain. HAGC shall act in accordance with the requirements of the Uniform Relocation Act in implementing any disposition of Public Housing to ensure protections for residents.

Goal Two: Manage the Housing Authority's Section 8 Existing Housing Program in an efficient and effective manner.

Objectives:

1. HUD shall continue to recognize the Housing Authority as at least a standard performer in accordance with for current Section Eight Management Assessment Program regulations. HAGC shall strive to comply with all the following:
 - Proper selection of applicants from the housing choice voucher waiting list
 - Sound determination of reasonable rent for each unit leased
 - Establishment of payment standards within the required range of the HUD fair market rent
 - Accurate verification of family income
 - Timely annual reexaminations of family income

- Correct calculation of the tenant share of the rent and the housing assistance payment
 - Maintenance of a current schedule of allowances for tenant utility costs
 - Ensure units comply with the housing quality standards before families enter into leases and PHAs enter into housing assistance contracts
 - Timely annual housing quality inspections
 - Performing of quality control inspections to ensure housing quality
 - Ensure that landlords and tenants promptly correct housing quality deficiencies
 - Ensure that all available housing choice vouchers are used
 - Expand housing choice outside areas of poverty or minority concentration
 - Enroll families in the family self-sufficiency (FSS) program as required and help FSS families achieve increases in employment income
2. The Housing Authority shall obtain a utilization rate of 95% or higher in its tenant-based program.
 3. The wait list for the Section 8 Housing Choice Voucher Program shall remain closed and only opened as determined necessary by the Executive Director on an ongoing basis. Based on the need to serve low-income families within Gloucester County, the waiting list will be opened from 8/5/19 to 8/10/19. The waiting list will be administered based on time and date of application with a preference for applicants living or working, or who have been hired to work, within Gloucester County and for applicants meeting the definition of eligibility for the mainstream voucher preference.
 4. The Housing Authority shall maintain the system to monitor concentration of units, and consider actions, such as increases in the payment standard in accordance with funding availability, needed to provide housing opportunities outside areas of low-income concentration. The Authority shall properly implement the Small Area Fair Market Rent rule and review the impact of the adopted payment standards on areas of low-income concentration. HAGC shall continue to successfully operate the HOME Funds Program for the County of Gloucester. The Gloucester County Board of Social Services refers families in danger of becoming homeless to the Authority.

Goal Three: Increase the number of affordable housing opportunities available to low-income residents of Gloucester County.

Objectives:

1. The Authority shall have ten Section 8 HCV Homeownership closings by 2024. Through the successful operation of the Homeownership Program, HAGC shall continue to prepare families to homeownership and economic independence.

2. The Authority shall pursue other development opportunities. On July 24, 2019 the HAGC Board of Commissioners passed a Resolution authorizing HAGC to execute an Agreement to Enter into a Housing Assistance Payments Contract for Housing Choice Voucher-Project Based Assistance with both: Woodbury Heights Family Housing and West Deptford Apartments Project; awarding 8 PBVs to Woodbury Heights Family Housing and 21 PBVs to West Deptford Apartments Project, subject to negotiating the business terms with each owner and subject to the approval of the business terms by HAGC Counsel.
3. The Authority shall continue implement a housing program benefiting families in danger of becoming homeless. HAGC shall continue to successfully operate the HUD-VASH program in partnership with the Philadelphia VA to provide housing assistance to homeless veterans referred by the VA

Goal Four: Enhance the quality of life for residents of housing assisted by the Housing Authority.

Objectives:

1. Maintain a system for regular communication between Commissioners, residents and staff. HAGC shall continue to comply with all requirements of the Open Public Meeting requirements, timely responds to communications from residents and facilitate the Resident Advisory Board meetings.
2. Maintain a cooperative relationship with an organization in the County providing self-sufficiency services to Housing Authority assisted families. HAGC shall evaluate and maintain partnership with third party agencies which offer benefits to residents.
3. Promote independence and aging in place for elderly and disabled Public Housing residents through the operation of the Resident Opportunity for Self-Sufficiency Program, Congregate Program and relationships with third-party service providers.

HOUSING AUTHORITY OF GLOUCESTER COUNTY

FIVE-YEAR GOALS STATEMENT OF PROGRESS AS OF JULY 2019

Goal One: Manage the Housing Authority's existing public housing program in an efficient and effective manner thereby qualifying as at least a standard performer.

Objectives:

1. HUD shall recognize the Housing Authority as at least a standard performer in accordance with the current Public Housing Assessment System regulations for FYE 12/31/16, 12/31/17, 12/31/18, 12/31/19 and 12/31/20.

PRESENT: HAGC was designated as a Standard Performer for FYE 12/31/17 and 18 and therefore achieved the above goal. HAGC's faces the challenge of public housing applicants preferring the location of Deptford Park over Carino Park. HAGC previously submitted a request for an adjustment due to market conditions for vacancies in Carino Park but has not received approval of the request from HUD.

HISTORY: HAGC has a long history of being considered a standard or high performer. For the fiscal year ended 12/31/06 and 12/31/07, the Authority submitted all information in a timely manner in accordance with the PHAS regulations, and was recognized as a high performer for 12/31/06 and a standard performer for 12/31/07 and 12/31/08. HAGC was rated as a high performer for 12/31/09, 12/31/10, and 12/31/11. A PHAS report was not required for FYE 12/31/12, therefore, there is no rating. For the FYE 12/31/13 and FYE 12/31/14, HAGC was rated a high performer.

Goal Two: Manage the Housing Authority's Section 8 Existing Housing Program in an efficient and effective manner.

Objectives:

1. HUD shall continue to recognize the Housing Authority as at least a standard performer in accordance with for current Section Eight Management Assessment Program regulations for FYE 12/31/16, 12/31/17, 12/31/18, 12/31/19 and 12/31/20

PRESENT: HAGC was evaluated as a High Performer for FY 12/31/18 and therefore exceeded the above goal. In obtaining the designation of a high performer, HAGC was evaluated on the following factors:

- Proper selection of applicants from the housing choice voucher waiting list
- Sound determination of reasonable rent for each unit leased
- Establishment of payment standards within the required range of the HUD fair market rent

- Accurate verification of family income
- Timely annual reexaminations of family income
- Correct calculation of the tenant share of the rent and the housing assistance payment
- Maintenance of a current schedule of allowances for tenant utility costs
- Ensure units comply with the housing quality standards before families enter into leases and PHAs enter into housing assistance contracts
- Timely annual housing quality inspections
- Performing of quality control inspections to ensure housing quality
- Ensure that landlords and tenants promptly correct housing quality deficiencies
- Ensure that all available housing choice vouchers are used
- Expand housing choice outside areas of poverty or minority concentration
- Enroll families in the family self-sufficiency (FSS) program as required and help FSS families achieve increases in employment income

HISTORY: HAGC has a long history of being considered a standard or high performer—HUD has recognized the Authority as a high performer for the years ended 12/31/06, 12/31/07, 12/31/08, 12/31/09, 12/31/10, and 12/31/11. HAGC was again recognized as a high performer for the FYE 12/31/13 and FYE 12/31/14 and a standard performer for FYE 12/31/15 and 12/31/16. HAGC was evaluated as a high performer for FYE 12/31/17.

2. The Housing Authority shall obtain a utilization rate of 95% or higher in its tenant-based program.

PRESENT: On average for 2019, HAGC had a Housing Assistance Payments utilization rate of 99% and voucher utilization rate of 88%. In order to increase utilization, HAGC has approved overtime for the Intake staff. HAGC staff worked diligently to verify eligible applicants and provide housing search assistance to voucher holders. The Tenant Briefing Program is held weekly to expedite leasing. Despite these efforts, eligible applicants often have a difficult time locating affordable housing and obtaining a security deposit. Further, HAGC has been required to implement the Small Area Fair Market Rent Rule which has an impact on the maximum subsidy for units in many of the zip codes in HAGC's legal area of operation.

HISTORY: During November 2004 and April 2005 through October 2005, the Authority stopped issuing Housing Choice Vouchers due to funding shortages. The overall utilization rate for 2005 was 97.5%. The Authority needed to be extremely cautious not over spend, as there were no additional administrative funds to cover any HAP costs not funded by HUD. This meant 2006 utilization was extremely low in the beginning of the year. Upon receipt of the funding notification for 2006, received in July 2006, the Authority began concentrating heavily on leasing new units. The overall utilization rate for 2006 was approximately 95%, based on

funding dollars. For the year ended 12/31/07, based on funding dollars, the utilization rate was 98%. Once again, this is a difficult objective to accomplish since the Authority was notified of the fiscal year 2007 funding in late June of 2007. The overall leasing rate for 2008 was greater than 100%. The over leasing in 2008 required HAGC not to issue Vouchers for 8 months so leasing rates would drop. Additionally, in 2008, HAGC had to utilize other funds to pay for over leased units. The overall leasing rate in 2009 was 98.1%. In September 2009 HAGC was awarded 97 more Vouchers exclusively for Non-Elderly Disabled Families in Support of Designated Public Housing (NED HCV's). The 2009 leasing rate does not include these vouchers. The 2010 leasing rate was 100.82% for dollars spent based on budget authority for housing assistance payments. Although we were under leased by 644 unit months, HAGC was not funded sufficiently to lease any additional units. The leasing rate for 2011 was about 103% for all HCV's. HAGC stopped issuing new HCV's in May 2011. Due to funding shortages, we did not begin issuing again until November 2011. In January 2012, HAGC had to reduce the Section 8 staff by 2 part time positions and 2 full time positions. This reduction in staff significantly affected our ability to lease turnover HCV's and complete the annual recertifications and interims in a timely manner. We have attempted to restructure the process, such as performing the annual recertification by mail rather than in person appointments whenever feasible. However, such actions have not negated the effect of the reduced staff. The final leasing rate for 2012 was 94.99%. The leasing rate for 2013 was 101.66%. HAGC was again not funded enough housing assistance payments monies to sustain the 1927 HCV's we have been allocated by HUD. HAGC was funded enough to support 1750 HCV's. During 2013 HAGC utilized much of its prior HAP reserves (referred by HUD as Net Restricted Assets, NRA) to maintain the units under lease. The leasing rate for 2014 was 95.15% of the HAP funding provided by HUD. The leasing rate as of 05/31/15 was 92% of the eligible budget authority and the leasing rate for the fiscal year end was 89.14%. The utilization rate as of May 2016 was 92.05% showing a mild upward trend in the later months of the year. For the month of June 2017, HAGC's Section 8 Housing Choice Voucher Program leased 1806 units out of an allocation of 1947 units, including 19 VASH units. 92.7% of the allocated units were under lease. 101% of the HAP funding received from HUD was expended in the month of June 2017. Leasing was temporarily suspended in spring 2017 in response to notice from HUD that HAGC was at risk for a shortfall of funds to support issued vouchers. As of June 2018, HAGC had a Housing Assistance Payments utilization rate of 104% and voucher utilization rate of 89%.

3. The wait list for the Section 8 Housing Choice Voucher Program shall remain closed and only opened as determined necessary by the Executive Director on an ongoing basis.

PRESENT: The HAGC Section 8 Housing Choice Voucher wait list is presently only open for veterans with proof of a valid DD214 and a discharge other than dishonorable. The waiting list is open only for this specific subcategory of applications satisfying the above preference in order to fulfill vouchers previously targeted and set aside for veterans.

HAGC has announced that effective 8/5/19-8/10/19 the Housing Choice Voucher Waiting list will be reopened with a preference for applicants living and working within the operating jurisdiction of the Housing Authority and for those applicants meeting the definition of eligibility for the Mainstream Voucher Program.

HISTORY: Due to funding cuts in 2005, HAGC stopped issuing HCVs. HAGC has been issuing vouchers since November 2005. HAGC opened the wait list for the Section 8 Housing Choice Voucher Program January 8-12, 2007, July 10-12, 2007, January 29-31, 2008, and January 20-22, 2009. HAGC accepted registrations January 26-28, 2010. A total of 2,127 registrations were processed during these days. HAGC accepted registrations again in January 2011. This time, the registrations were accepted only by mail and a total of 1461 registrations were received. The registrations had to be postmarked from January 24-29, 2011. The Section 8 Housing Choice Voucher wait list was not opened in 2012, 2013, 2014 or 2015. The Executive Director opened the waitlist and accepted registrations for the Section 8 Housing Choice Voucher Program, by mail and via the online portal from 8/8/16 through 8/13/16. A copy of the ad was published in the SJ Times on Sunday, 7/31/16. A total of 1,601 applications were received. All applications have been entered and prospective applicants were mailed a confirmation letter.

4. The Housing Authority shall maintain the system to monitor concentration of units, and consider actions, such as increases in the payment standard in accordance with funding availability, needed to provide housing opportunities outside areas of low-income concentration.

PRESENT: In accordance with HUD's Final Rule Establishing Small Area Fair Market Rents (SAFMR) in the Housing Choice Voucher Program and guidance published in HUD PIH 2018-01, HAGC developed and implemented revised payment standards effective 4/1/2018. As mandated by HUD, PHAs located in specific designated areas, including the Philadelphia-Camden-Wilmington area, are required to adjust the payment standards for any ZIP code area where the current payment standard falls outside of the basic range of the SAFMR. The payment standard amount must be within the basic range of 90%-110% of the HUD published SAFMR. The revised payment standards are effective 4/1/18. However, for families under HAP contract where the payment standard will be decreasing, the lower payment standard will not be used until the family second regular reexamination following the effective date of the decrease in the payment standard. In establishing revised payment standards based on the SAFMRs, HAGC/GHA staff first reviewed all the HUD published SAFMRs for the zip codes in Gloucester County. The SAFMRs were compared to the existing payment standards to determine whether the SAFMRs fell outside the required range of 90-100%. Four categories were created-(1) The Green Group-in these zip codes the SAFMRs fell within the required range and therefore the payment standard will remain consistent; (2) The Yellow Group-in these zip codes the SAFMRs fell below the required range; (3) The Red Group- in these zip codes the SAFMRs exceeded the required range and (4) The Blue Group/Glassboro- in these zip codes the SAFMRs fell below the required

range. Once the zip codes were grouped, HAGC determined a new 90-110% required range for the groups using internal reports which average the cost of units in the zip code and the financial impact of HAGC's overall operations. All impacted residents were notified in writing and HAGC prepared mailings to landlords and interested members of the community. The ultimate goal of the SAFMRs is to reduce areas of low-income concentrate and increase housing opportunities in areas of high opportunity, previously outside the metropolitan FMR.

HISTORY: A decrease in the 10/01/05 Fair Market Rents required the Authority to lower the payment standard for 3, 4 and 5 bedroom units. The 2006, 2007, and 2008 FMR's and, consequently, HAGC's payment standards increased. Based on the deconcentration data maintained by the Authority, the payment standard is the main factor that decreases a concentration of units. In addition to the FMR, the available funding affects the Authority's ability to increase the payment standard. HAGC was not able to increase the payment standard based on the 2009 FMR's due to funding constraints. The 2010 FMR's decreased. However, HAGC kept the payment standards the same to promote deconcentration. Again in 2011 there was a slight decrease in the FMR's. During 2014, HAGC maintained the Payment Standards at 100% of the Fair Market Rents. On July 22nd, 2015, the board approved increasing the Payment Standards to 110% of the FMR in an effort to improve leasing. Payment Standards continue to remain at or close to 100% of the FMR. In 2017, in accordance with HUD regulations and with Board approval, HAGC continues to increase the Payment Standards to 110% of the FMR which in turn improves leasing and broaden the housing search. The Authority is maintaining deconcentration data in accordance with this objective.

Goal Three: Increase the number of affordable housing opportunities available to low-income residents of Gloucester County.

Objectives:

1. The Authority shall have two Section 8 HCV Homeownership closings by 2018.
PRESENT: As of June 1, 2019 there are 9 voucher participants in the Section 8 Housing Choice Voucher Homeownership program in various communities throughout Gloucester County. Financial education is used to assist clients in obtaining the goal of becoming a homeowner and productive community member. The homeownership program currently has another 3 participants actively ready to search for homes. HAGC is working closely with the approved individuals to facilitate the process of closing and finalizing homeownership. HAGC has observed an improvement in the homeownership program from the prior year.
HISTORY: The Authority had five Section 8 Homeownership closings during 2005, five in 2006, and five in 2007. There was one closing in 2008 and three in 2009. Section 8 HCV Homeownership activity has slowed down due to the current housing market and corresponding mortgage crisis. There were no closings in 2010 or 2011, one in 2012, and none in 2013. In 2014, 4 families became Homeowners and 1 family searched for a home in 2015 but did not become homeowners. In 2016 two public

housing families withdrew from program assistance to become first time homeowners. The Authority anticipated two Section 8 HCV Homeownership closings in 2017. Two HCV participants have been approved for Mortgages and were searching for homes. However, by the end of the year, neither was ready to commit to Homeownership. Attendance rates in Homeownership Counseling Classes have improved, and the Authority's efforts to promote the County Down Payment Assistance Program have been successful. Many clients have secured large Escrow Deposits to assist with Homeownership. There were currently 8 participants in HAGC's Homeownership program. As of July 2018, HAGC anticipates 1 homeownership closing. There are 20 participants in the homeownership program and 3 have been approved for mortgages.

2. The Authority shall pursue other development opportunities.

PRESENT: Presently HAGC has 19 Project Based Vouchers to use at Camp Salute Veterans Housing Program which is in development to provide low to moderate income families housing with a Veteran Preference in Clayton New Jersey. HUD approved the subsidy layering review for the PBV's. The project broke ground in June 2018 and HAGC approved eligible veterans for occupancy as units become available.

HAGC was also awarded funding through the 2018 Mainstream Voucher Program for additional Housing Choice Vouchers for non-elderly persons with a disability who are transitioning out of institutional or other segregated settings, at serious risk of institutionalization, homeless or at risk of becoming homeless. Specifically, HAGC received an award of \$361,191 for the 2018 Mainstream Voucher, this amount will support approximately 40 vouchers for individuals with disabilities

In 2018 HAGC submitted a Letter for Interest for placement of the Rental Assistance Demonstration (RAD) waiting list with HUD. HAGC will proceed with submission of the RAD application in order to transition HAGC's Public Housing units into RAD-Project Based Vouchers (PBV). On May 10, 2019 HUD approved HAGC's Significant Amendment for the RAD Program to convert these AMPs from Public Housing under the Rental Assistance Demonstration (RAD) Program to Project-Based Vouchers (PBV). HAGC submitted this application to HUD on August 22, 2018, was approved on December 11, 2018 and accepted the Commitment to Enter into Housing Assistance Payments Contract on January 3, 2019. HAGC works to implement the conversion in accordance with HUD regulations and applicable notices including PIH 2012-3, Rev-3 and any subsequent notices. Through the conversion to RAD, HAGC hopes to preserve the public housing properties and improve financial stability.

Further, HAGC anticipates proceeding with an application to HUD in accordance to HUD PIH 2018-04 and 24 CFR 970, which codifies Section 18 of the Housing Act of 1937. HAGC is in the very preliminary stages of considering proceeding with an application to HUD for approval to dispose of the 62 scattered site homes operated under the Public Housing Program. HAGC believes that disposition serves the best interest of the residents of HAGC and is consistent to the goals of the PHA plan as the

scattered site homes demonstrate unsustainability in operation and maintenance. HAGC will ensure protection of current residents by either proceeding with disposition at unit turn over only, or acting in compliance with the Uniform Relocation Act. HAGC's goal is to utilize funds secured through disposition to develop a sustainable affordable housing project. HAGC has published a Request For Proposal dated 6/21/19 inviting owners and developers of existing and new construction rental projected within the County of Gloucester to submit proposals for participation the Section 8 Project Based Voucher Program. HAGC is seeking to make up to 30 units available for veterans.

HISTORY: In 2011, HAGC, in conjunction with its development partner, the Center for Family Services, applied for funding through HUD's Section 202 program to fund the development of an 80 unit elderly building in Woolwich Township. Only 3 projects in NJ were funded, none of which were located in the South Jersey region. HAGC continues to pursue other development opportunities to supplement the funding shortfalls from HUD.

3. The Authority shall continue implement a housing program benefiting families in danger of becoming homeless.

PRESENT: The Authority is administering HOME funds for the County of Gloucester. The Gloucester County Board of Social Services refers families in danger of becoming homeless to the Authority. These families are unable to obtain services from other organizations throughout the County. Currently 7 families are on the wait list for HOME funds and 11 families are under contract and receiving assistance. The Authority also maintains Targeted Section 8 Housing Choice Vouchers for eligible applicants who are homeless or imminently homeless. HAGC also is administering 24 Veterans Affairs Supportive Housing Choice Vouchers (HUD-VASH) for homeless Veterans in partnership with the Philadelphia VA. A total of 19 families have been housed under the HUD-VASH program. HAGC was also awarded funding through the 2018 Mainstream Voucher Program for additional Housing Choice Vouchers for non-elderly persons with a disability who are transitioning out of institutional or other segregated settings, at serious risk of institutionalization, homeless or at risk of becoming homeless.

HISTORY: In 2015 6 families are on the wait list for HOME funds and 8 families were under contract and receiving assistance. In 2016, 12 families were on the waitlist and 8 families were under contract and receiving assistance. In 2017, 15 families were on the waiting list and 8 families were under contract and receiving assistance.

Goal Four: Enhance the quality of life for residents of housing assisted by the Housing Authority.

Objectives:

1. Maintain a recreational/educational program for youth and pursue an additional program to benefit the youth.

PRESENT: Due to funding and staffing restrictions, HAGC has been unable to dedicated funds or administrative resources to pursuing this objective.

HISTORY: In 2005, 2006, and 2007 the Authority provided financial support to the National Youth Sports Program operated by the Gloucester County College as well as outreach to youth living in housing assisted by HAGC. The NYSP was cancelled in 2008 and 2009 due to lack of funding although, the Authority had passed a resolution to continue our financial support in 2008 and would have done so in 2009. The Resident Relations Coordinator also performed a mailing to families with youth from ages 16-20 years who may qualify for either the Youth One Stop Summer Program or the Youth One Stop Career Center. Additionally, the FSS Coordinator, Resident Relations Coordinator and Executive Director are members of the Gloucester County Youth Council. To date, the NYSP has not been re-established. HAGC is still searching for an alternative program to serve the youth. In 2012 HAGC polled 204-1 residents for interest in a summer exercise class for children. There was no interest expressed by the residents. The Authority continued to search for activities for the youth.

2. Maintain a system for regular communication between Commissioners, residents and staff.

PRESENT: Open and regular communication exists between Commissioners, residents and staff facilitated by the Resident Relations Committee, Resident Advisory Board, resident meetings and the Resident Relations Coordinator.

HISTORY: The Chairman of the Board of Commissioners appointed a Resident Relations Committee in 2000. The Chair of the Committee is a resident of Colonial Park Apartments. The Committee Chair has met with resident leaders and reports to the full Board each month. The Housing Authority formed a Resident Advisory Board in 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014 2015 , 2016, 2017 and 2018 to provide resident guidance on the development and update of the Agency and Annual Plans.

3. Maintain a cooperative relationship with an organization in the County providing self-sufficiency services to Housing Authority assisted families.

PRESENT: HAGC has committed to support various segments of the population through the use of Targeted Vouchers including, homeless families with referrals from VOA shelter, Services Empowering Rights of Victims (SERV), Center for Family Services Mother/Child Residential Program and New Point Behavioral Health (NPBH), Displaced by Community Redevelopment, and Veterans. Presently the targeted vouchers are underutilized. However, HAGC has contacted all applicant for targeted waiting lists to begin the process of eligibility determinations.

HAGC entered into Letters of Intent with Gloucester County Department of Social Services, Division of Human & Disability Services and the Arc of Gloucester County to lease the vouchers and fulfill the needs of the Mainstream Voucher participants in program participation and long term success.

HISTORY: As of December 31, 2000, 30 WFNJ vouchers were leased. The Authority designated an additional 50 vouchers for the homeless on January 31, 2001. These HCV's remained 100% utilized as of June 2011. However, as of July 2012, targeted HCV's were only 84% utilized. Once again, the reduction in staff has hugely affected our ability to fulfill our mission. Yet there are no funds to fill the vacant positions. Additionally, the HAP funding constraints in 2013 prevent HAGC from fully utilizing all vouchers. The targeted HCV's were approximately 90% utilized in 2013, 64% in 2014 and 60% in 2015 YTD. The WFNJ Housing Choice Vouchers were 43% leased in 2014, 35% in 2015 and 45% in 2016. HAGC is attempting to lease up these HCV's.

4. Promote independence and aging in place for elderly and disabled Public Housing residents.

PRESENT: HAGC was awarded a 4th grant in the amount of \$246,000 over three years, 2016-2019, for the Resident Opportunity for Self-Sufficiency Program. (ROSS). Through the grant the following programs are provided: Art Class, Exercise Class, Health Fair Day, Social Activities including Bingo, Shuffle Board, Pool, Virtual Bowling, Internet and Computer Classes, Library memberships, Health & Education Workshops, Special Event BBQS & Parties, and Daily Living Assessments. HAGC also works in partnership with a nursing agency, DPSP, which provides nursing and wellness services to residents.

In July 2018, HAGC submitted an application to HUD seeking renewal funding to continue to successfully operate the ROSS program. HAGC was awarded grant funding for an additional three years. A primary goal of the grant is continue to be to serve the needs of the elderly/disabled population and facilitate aging in place. HAGC will accomplish this goal by partnering with outside agencies and well as providing program and services through HAGC staff. Committed partners include Deptford Center Healthcare to provide motor skills assessment, social activity program, and physical needs; and Elmwood Hills Healthcare to provide self-sufficiency/rehabilitative therapy, Alzheimer's and Dementia Education and assistance with Medical Insurance Coverage.

HAGC maintains a Memorandum of Understanding with the Gloucester County Department of Social Services which facilitates the referrals and coordination of services for individuals with disabilities. The Gloucester County Department of Social Services encompasses the Division of Senior Services, Social Services, Health Services and Human & Disability Services. The Division of Disability Services assists all persons with disabilities who are 18 years of age and older with the services they need to continue living independently in the community. The mission is to serve as a single point of contact for individuals with disabilities needing information and services to increase educational, vocational social opportunities, transitional services and personal health and care. The MOU establishes the framework for the providing, sharing and exchanging of information to assure vital and necessary supportive services offered by the County Division of Social Services are accessed by

HAGC clients. The MOU further provides for the cooperation of the County Department of Social Services and HAGC in making the proper program and service referrals for which individuals, including those with disabilities, share and exchange information.

In properties owned and managed by HAGC, including Public Housing, HAGC operates a Congregate Services Program providing meals, laundry and housekeeping services to individuals who are often disabled. This resource provides tenancy support to help encourage persons with disabilities to continue to remain independent. On average, HAGC's Congregate Services Program serves approximately 1,114 meals a months and 476 personal services. The Congregate Services Program is staffed by a Congregate Coordinator and staff who work closely with disabled residents and facilitate community referrals when needed. Referrals are also made to Adult Protective Services in the event that staff has a reasonable basis to believe that the resident is a vulnerable adult and is at risk for abuse, neglect, or exploitation and who, because of physical or mental illness or disabilities, lack sufficient capacity to make, communicate or carry out decisions concerning their well being.

The Congregate program is supplemented and enhanced by a Memorandum of Understanding with Assisted living Provider, DPSP, who provides on-site services to individuals who are often times disabled. DPSP is a licensed Assisted Living Program which individually tailored services including nursing care, assistance with personal care, assistance with accessing transportation, and other supportive services to help residents age in place rather than being displaced to a nursing home or other intuitional facility.

HISTORY: The Authority applied for funding under HUD's FY 2006 Super NOFA for the Resident Opportunity for Self-Sufficiency Program. The closing date for the grant was July 13, 2006. The Authority received notification we were awarded \$76,066 over 3 years. The Authority implemented ROSS Health & Wellness Seminars for the Deptford and Carino Park residents as well as assessing the residents for the need of additional services in accordance with the grant application. The grant closed March 31, 2010. HAGC was awarded a different ROSS Coordinator grant totaling \$112,000 for salaries and administrative costs over 3 years. HAGC continues to provide various ROSS Health and Wellness Seminars. In addition, we provide art lessons and exercise classes to residents of Deptford and Carino Park. The current ROSS grant also covers self-sufficiency activities for the NJ 204-1 scattered site program. The second ROSS grant ended 6/30/13. HAGC was awarded a 3rd ROSS grant in the amount of \$243,000 over 3 years which ended 06/30/16.

HOUSING AUTHORITY OF GLOUCESTER COUNTY

STATEMENT REGARDING VAWA GOALS

ANNUAL PLAN 2020 AND FIVE YEAR PLAN

With respect to the Violence Against Women Reauthorization Act, it is the Housing Authority of Gloucester County's Goal to implement the following policy to ensure compliance with *24 CFR Part 5, subpart L*.

Housing Authority of Gloucester County

VIOLENCE AGAINST WOMEN ACT (VAWA) POLICY

I. Purpose and Applicability:

This Violence Against Women Act Policy implements the requirements of the 2013 reauthorization of the Violence Against Women Act (VAWA) which applies for all victims of domestic violence, dating violence, sexual assault and stalking regardless of sex, gender identity or sexual orientation. This Policy shall be applied consistently with all nondiscrimination and fair housing requirements. This Policy covers all applicants and tenants of HUD-covered programs. Neither VAWA nor this Policy implementing it shall preempt or supersede any provision of Federal, State or local law that provides greater protection than that provided under VAWA for victims of domestic violence, dating violence or stalking.

This Policy shall be implemented in accordance with *24 CFR Part 5, Subpart L*, Protections for Victims of Domestic Violence, Dating Violence, Sexual Assault or Stalking as well as various subparts of *24 CFR parts 200, 247, 880, 882, 883, 884, 886 and 891*, HUD-Notice H 2017-05 and any other HUD subsequent applicable Notices

II. Goals and Objectives:

This policy has the following principal goals and objectives:

- A. Maintaining compliance, including training of appropriate staff managing the Authority's properties and programs, with all applicable legal requirements imposed by VAWA;
- B. Participating, with others, in protecting the physical safety of victims of actual or threatened domestic violence, sexual assault, dating violence, or stalking who are assisted by the Authority;
- C. Providing and maintaining housing opportunities for victims of domestic violence, sexual assault, dating violence, or stalking;
- D. Cooperating, with others, information and maintenance of collaborative arrangements between the Authority, law enforcement authorities, victim services providers, and others to promote the safety and well-being of victims of actual and threatened domestic violence, sexual assault, dating violence and stalking, who are assisted by the Authority; and

E. Responding in accordance with the Authority policies and procedures to incidents of domestic violence, sexual assault, dating violence, or stalking, affecting individuals assisted by the Authority.

III. Definitions:

The Authority shall implement all definitions as established in *24 CFR 5.2003*

IV. Admissions and Screening

Non-Denial of Assistance. The Authority will not deny admission an applicant on the basis or as a direct result of the fact that the applicant is or has been a victim of domestic violence, dating violence, sexual assault or stalking if the applicant is other qualified for admissions. Further, the Authority will not deny admissions based on an adverse factor, if the adverse factor is determined to be a direct result of the fact that the applicant is or has been a victim of domestic violence, dating violence, sexual assault or stalking.

Also, if an applicant or an affiliated individual of the applicant is or has been the victim of domestic violence, dating violence, sexual assault, or stalking by a member of the household or any guest, the applicant may not be denied rental assistance or occupancy rights with the Authority solely on the basis of criminal activity directly relating to that domestic violence, dating violence, sexual assault, or stalking.

V. Termination of Tenancy or Assistance

A. VAWA Protections. Under VAWA, specific protections which will be observed by the Authority:

1. An incident or incidents of actual or threatened domestic violence, dating violence, or stalking will not be considered to be a “serious or repeated” violation of the lease by the victim or threatened victim of that violence and will not be good cause for terminating the tenancy or occupancy rights of or assistance to the victim of that violence.

2. Tenancy or assistance will not be terminated by the Authority on the basis or as a direct result of the fact that the tenant/participant is or has been a victim of domestic violence, dating violence, sexual assault or stalking. Further, the Authority will not terminate tenancy or participation based on an adverse factor, if the adverse factor is determined to be a direct result of the fact that the applicant is or has been a victim of domestic violence, dating violence, sexual assault or stalking. However, the protection against termination of tenancy or assistance described in this paragraph is subject to the following limitations:

- i. Nothing contained in this paragraph shall limit any otherwise available authority to terminate tenancy, evict, or to terminate assistance, as the case may be, for any violation of a lease or program requirement not premised on the act or acts of domestic violence, dating violence, or stalking in question against the tenant or an affiliated individual of the

tenant. However, in taking any such action, the Authority shall not apply a more demanding standard to the victim of domestic violence dating violence or stalking than that applied to other tenants.

ii. Nothing contained in this paragraph shall be construed to limit the Authority's ability to evict or terminate from assistance any tenant or lawful applicant if the Authority as the case may be, can demonstrate an actual and imminent threat to other tenants or to those employed at or providing service to the property, if the tenant is not evicted or terminated from assistance. In order to demonstrate an actual or imminent threat, the Authority must have objective evidence of words, gestures, action or other indicators of such threats. Any eviction or termination of assistance, predicated on this basis should be utilized by the Authority only when there are no other actions that could be taken to reduce or eliminate the threat, including, but not limited to, transferring the victim to a different unit, barring the perpetrator from the property, contacting law enforcement to increase police presence or develop other plans to keep the property safe, or seeking other legal remedies to prevent the perpetrator from acting on a threat. Restrictions predicated on public safety cannot be based on stereotypes, but must be tailored to particularized concerns about individual residents.

B. Removal of Perpetrator. Further, notwithstanding the above or Federal, State or local law to the contrary, the Authority, may bifurcate a lease, or remove a household member from a lease, without regard to whether a household member is a signatory to a lease, in order to evict, remove, terminate occupancy rights, or terminate assistance to any individual who is a tenant or lawful occupant and who engages in acts of physical violence against family members or others. Such action against the perpetrator of such physical violence may be taken without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is also the tenant or a lawful occupant. Such eviction, removal, termination of occupancy rights, or termination of assistance shall be effected in accordance with the procedures prescribed by law applicable to terminations of tenancy and evictions by the Authority. In the event of Lease Bifurcation, remaining family members must meet statutory requirements for housing assistance

VI. Verification of Domestic Violence, Dating Violence or Stalking

A. Requirement for Verification. The Authority shall require verification in all cases where an individual claims protection against an action involving such individual proposed to be taken by the Authority. Verification of a claimed incident or incidents of actual or threatened domestic violence, dating violence or stalking may be accomplished in one of the following three ways:

1. By completing a HUD-approved form;
2. Other documentation - by providing to the Authority signed by an employee, agent, or volunteer of a victim service provider, an attorney, or a medical professional, from whom the victim has sought assistance in addressing the domestic violence, dating violence or stalking, or the effects of the abuse, described in such documentation. The professional providing the documentation must sign and attest under penalty of perjury (28 U.S.C. 1746) to the

professional's belief that the incident or incidents in question meet the applicable definitions for protections and remedies under VAWA. The victim of the incident or incidents of domestic violence, dating violence or stalking described in the documentation must also sign and attest to the documentation under penalty of perjury;

3. A record of a Federal, State, tribal, territorial, or local law enforcement agency, court, or administrative agency that documents the incident of domestic violence, dating violence, sexual assault, or stalking. Examples of such records include police reports, protective orders, and restraining orders, among others.

The Authority may ask for clarification or additional information in order to make an objectively reasonable determination of whether the adverse factor is a direct results of the applicant or tenant being a having been a victim.

B. Time allowed to provide verification / failure to provide. An individual who claims protection against adverse action based on an incident or incidents of actual or threatened domestic violence, dating violence or stalking, and who is requested by the Authority to provide verification, must provide such verification within 14 business days (i.e., 14 calendar days, excluding Saturdays, Sundays, and federally-recognized holidays) after receipt of the request for verification. The Authority may grant an extension during which no adverse action can be taken. Failure to provide verification, in proper form within such time will result in loss of protection under VAWA and this policy against a proposed adverse action.

C. Acceptance of Verbal Statement. The Authority may, with respect to any specific case, waive the above stated requirements for verification and provide the benefits of this policy based on the victim's statement or other corroborating evidence. Such waiver may be granted in the sole discretion of the Executive Director or his/her designee and generally in such cases where the Authority is otherwise aware of the abused and encouraged the victim to request VAWA protections. Any such waiver must be in writing. Waiver in a particular instance or instances shall not operate as precedent for, or create any right to, waiver in any other case or cases, regardless of similarity in circumstances.

D. Request for Third-Party Documentation of Victim Status

The Authority will request third-party documentation of victim status if more than one applicant or tenant provides documentation to show they are victims of domestic violence, dating violence, sexual assault or stalk and in the information in one person's documentation conflicts with the information in another person documentation or submitted documentation contains information that conflicts with existing information already available to the Authority. When eviction or terminating one household member, the Authority shall follow family break up policies and the *Authority's Grievance Procedures Policy*.

VII. Confidentiality

A. Right of confidentiality. All information (including the fact that an individual is a victim of domestic violence, dating violence or stalking) provided to the Authority in connection with a

verification required of this policy or provided in lieu of such verification where a waiver of verification is granted, shall be retained by the receiving party in confidence and shall neither be entered in any shared database nor provided to any related entity, except where disclosure is: 1. requested or consented to by the individual in writing, or 2. required for use in eviction proceeding or in connection with termination of assistance, as permitted in VAWA, or 3. otherwise required by applicable law. The Authority will take reasonable precautions to avoid inadvertent disclosures via mail or voicemail and conduct the exchange of confidential information in person with the victim. All VAWA correspondence shall be secured to maintain confidentiality separate from the tenant file.

B. Notification of Rights. The Authority shall provide notice of Occupancy Rights (HUD 5380) and the Certification of Domestic Violence Form (HUD 5382) at the following times: To applicants with denial of assistance; At move in; With notice of eviction or termination of assistance; To each household during the annual recertification; any other time when HUD-5382 is supplied.

VIII. Court Orders/Family Break-up

A. Court orders. It is the Authority's policy to honor orders entered by courts of competent jurisdiction affecting individuals assisted by the Authority. This includes cooperating with law enforcement authorities to enforce civil protection orders issued for the protection of victims and addressing the distribution of personal property among household members in cases where a family breaks up.

X. Relationships with Service Providers

It is the policy of the Authority to cooperate with organizations and entities, both private and governmental that provides shelter and/or services to victims of domestic violence. If the Authority staff becomes aware that an individual assisted by the Authority is a victim of domestic violence, dating violence or stalking, the Authority will refer the victim to such providers of shelter or services as appropriate.

Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

Emergency Transfers

The Authority is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),¹ The Authority allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency

¹ Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.² The ability of The Authority to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether The Authority has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy. This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that Authority's federally assisted housing programs are in compliance with VAWA.

Eligibility for Emergency Transfers

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at *24 CFR part 5, subpart L* is eligible for an emergency transfer, if: the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer. A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan. Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

Priority For Tenants/Applicants who Qualify for Internal and External Transfers

The Authority does not maintain a waiting list preference for VAWA victims. However, Tenants who qualify for Internal and External transfers shall be entitled to a waiting list priority. VAWA admission preferences shall not supersede usual eligibility criteria.

Emergency Transfer Request Documentation

To request an emergency transfer, the tenant shall notify The Authority's management office and submit a written request for a transfer within the Authority. The Authority will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

² Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under The Authority's program; OR
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

The Authority shall retain records of all emergency transfer requests and their outcomes for three years or for a period of time as specified in the program regulations.

Confidentiality

The Authority will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives the Authority written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. Information shall not be entered into shared databases. *See the Notice of Occupancy Rights under the Violence Against Women Act For All Tenants* for more information about The Authority's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

Emergency Transfer Timing and Availability

The Authority cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. However, tenants shall be permitted to make an internal emergency transfer under VAWA when a safe unit is immediately available and such transfers shall be given priority as an emergency transfer request. The Authority will act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. The Authority may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If, after a reasonable time, the Authority has no safe and available units for which a tenant who needs an emergency transfer is eligible, the Authority will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. This shall be deemed an "External Emergency Transfer", meaning a transfer of a tenant to another unit or form of assistance where the tenant would be categorized as a new applicant. At the tenant's request, the Authority will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

Tenants with tenant-based rental assistance shall be issued a voucher to move with continued tenant-based assistance.

Safety and Security of Tenants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

Please see local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking.

- **Center for Family Services – Services Empowering the Rights of Victims (SERV)**
www.centerffs.org
serv@centerffs.org
1-866-295-SERV (7378)
PO Box 566
Glassboro, NJ 08028
- **NJ Domestic Violence Hotline**
www.nj.gov/dcf/women/domestic
1-855-INFO-DCF (463-6323)
PO Box 729
Trenton, NJ 08625
- **Family Part-Chancery Division Superior Court of NJ**
1-856-379-2200
101 S 5th Street, 2nd Floor
Camden, NJ 08103
- **New Jersey Domestic Violence Hotline**
1-800-572-SAFE (7233)

HOUSING AUTHORITY OF GLOUCESTER COUNTY

DEFINITION OF SIGNIFICANT AMENDMENT/ MODIFICATION

ANNUAL PLAN 2020 AND FIVE YEAR PLAN

Significant amendments and substantial deviations/modifications from the 5 Year Plan and Annual Plan shall be defined as discretionary changes in the plans or Authority policies that fundamentally change the mission, goals, objectives, or plans of the Authority and which require formal approval of the Board of Commissioners.

The following shall not be deemed a substantial deviation from the PHA Plan: the decision to convert to either Project Based Rental Assistance or Project Based voucher Assistance; Changes to the Capital Fund Budget provided as a result of each RAD Conversion , regardless of whether the proposed conversion will include use of additional Capital Funds; Changes to the construction and rehabilitation plan for each approved RAD conversion; and Changes to the financing structure for each approved RAD conversion.



August 14, 2019

Board of Commissioners
Housing Authority of Gloucester County
100 Pop Moylan Blvd
Deptford, New Jersey 08096

Re: Public Housing Agency Plan

Dear Commissioners:

The Resident Advisory Board (RAB) has reviewed the Public Housing Agency Plan for the Housing Authority of Gloucester County (HAGC) which includes the Annual Plan for FY2020 and the 5-Year Plan FY2020-2024. The Public Housing Agency Plan serves to inform HUD, residents, and the public of HAGC's mission for serving the needs of low and very-low income families and HAGC's strategies for addressing those needs. The Plan also includes summaries of the new activities HAGC intends to undertake as well as revisions to HAGC's plan elements. The RAB met with HAGC staff on the following days: June 12, 2019; June 26, 2019; July 17, 2019; July 31, 2019 and August 14, 2019. Please note the RAB's support of the following:

1. The RAB reviewed the Five Year Goals established for the Agency Plan and the progress towards HAGC's prior goals and objectives. The RAB supports the designated goals and objectives.
2. The RAB reviewed and supports the Housing Authority's Annual Agency Plan and Annual Plan of 2020.
3. The RAB reviewed and supports the Housing Authority's conversion of Public Housing units located at Carino Park Apartments and Deptford Park Apartments to Project-Based Vouchers under the Rental Assistance Demonstration Program. The RAB supports these units being designated for the elderly. The RAB agrees that the conversion is a viable method for persevering and sustaining affordable housing units for low-income seniors.
4. The RAB reviewed and supports the Housing Authority's plan for proceeding with an application to HUD for approval to dispose of the 62 scattered site homes operated under the Public Housing program in accordance with HUD PIH 2018-04 and 24 CFR 970. The RAB agrees that disposition serves the best interest of the residents of HAGC and is consistent with the goals of the PHA plan as the scattered site homes demonstrate unsustainability in operation and maintenance. The scattered site homes are located far

from one another and contain diverse maintenance systems that are difficult and costly to upkeep. The homes also require significant modernization and upgrades requiring extensive labor and expense. HAGC shall act in accordance with the requirements of the Uniform Relocation Act in implementing any disposition of Public Housing to ensure protections for residents. The RAB members agree that the families who occupy the scattered site homes will be better served through obtaining a housing choice voucher. The voucher affords more flexibility to the families in selecting a unit appropriate for the family's unique needs based on employment, schooling, proximity to family members and community resources.

5. The RAB supports HAGC's goal to increase the number of affordable housing opportunities available to low-income residents of Gloucester County. This shall include, but not be limited to, pursuing development opportunities and entering into Housing Assistance Payments Contracts for project-based vouchers to serve veterans.

The Resident Advisory Board suggested the following recommendations to the Plan and provided the following feedback. Recommendations were incorporated into the Plan where applicable.

1. Members of the RAB are in support of HAGC's Revised Admissions and Continued Occupancy Policy. The revised policy contains additional information regarding HAGC's Non-discrimination policy, applicant screening based on credit history, and HAGC's Policy regarding the treatment of over-income households in accordance with the requirements of the Housing Opportunities Through Modernization Act. Specifically, after a household's income exceeds 120% of the area median income (AMI) for two consecutive years, the Authority will charge the household rent equal to the greater of the Fair Market Rent (FMR) or the amount of their unit's operating and capital subsidy. The Authority shall implement the HUD published over-income limits by household size for each locality established annually. When the Authority determines that a household's income exceeds the over-income limit during an annual or interim income reexamination, the Authority shall document the household's income in order to compare it with the household's income the following year. If the household's income exceeds the over-income limit one year later, the Authority must notify the household in writing that, if their income still exceeds the over-income limit 12 months later, the household will be subject to the Authority's over-income policy. The over-income Policy shall not apply if an over-income household's income falls below the over-income limit before the two-year mark.
2. Members of the RAB support HAGC's revised Section 8 Administrative Plan. The Plan contains additional information regarding HAGC's Non-discrimination policy, services for Persons with Limited English Proficiency, definition of eligibility for the Mainstream preference under the Housing Choice Voucher Program, strategy for Outreach to Owners Outside Areas of Low-Income or minority concentration and more specific policy governing the Project-Based Voucher Program which serves voucher holders at Camp Salute.

3. Members of the RAB support HAGC's revised Live-in Aide Policy and supporting Live-In Aide Certification to ensure that a Live-in Aide meets the HUD prescribed definition as person approved by the Authority who resides in the unit to care for a "family member" who is disabled or at least 50 years of age and who: (1) Is determined to be essential to the care and well-being of the person(s); (2) Is not obligated for support of the person(s); and (3) Who would not be living in the unit except to provide necessary support services.
4. Members of the RAB are in favor of HAGC's revised Grievance Procedures Policy. This Policy sets forth the rights and obligations of both the Housing Authority and program applicants and participants to ensure due process requirements have been satisfied.
5. Members of the RAB support the enforcement of HAGC's Smoke-Free Policy on all owned and managed properties and continued efforts to offer smoking cessation resources to residents who wish to quit smoking. Members of the Board wish for HAGC to offer designated areas with a covering for smoking. The RAB acknowledges that HAGC must first identify funding available to support smoking shelters.
6. Members of the RAB support HAGC's Pet Policy and support the continued enforcement of this Policy to ensure the interests of the residents in pet ownership are balanced with the protection of HAGC property and the safety of all residents.
7. Members of the RAB support HAGC's One Strike You're Out Policy which prohibits program applicants and participants from engaging in certain drug-related, violent and criminal activity.
8. Member of the RAB are in support of the Capital Fund 5-year Plan and support that modernization be performed in vacancies as needs.
9. Members of the RAB support HAGC's Congregate Program in offering services to residents to help age in place and maintain independence.
10. Members of the RAB support HAGC's continued partnership with Assisted Living Providers.
11. Members of the RAB support HAGC's continued efforts through the ROSS program to provide social, education and health/wellness related services to residents. Members of the Board wish for additional resident involvement in programs.
12. Members of the RAB are in support of the Section 8 wait list remaining open only for Veterans with a discharge other than dishonorable.
13. Members of the RAB support the implementation of HAGC's Violence Against Women Policy and Emergency Transfer Plan to ensure the proper protections, confidentiality and notices are provided to victims of domestic violence, dating violence, sexual assault and stalking.
14. The RAB requested that HAGC investigate several maintenance related matters including replacement of parking lot light fixtures at Deptford Park Apartments and air conditioning/ HVAC for the hallways at Deptford Park Apartments. HAGC followed up and provided RAB members information on the status of all maintenance matters.
15. The RAB supports the reinstatement of meetings for public housing residents and HAGC staff on a bi-annual basis.

We understand that the above comments and suggestions, when appropriate, have been included into the Five Year Agency and Annual Plans.

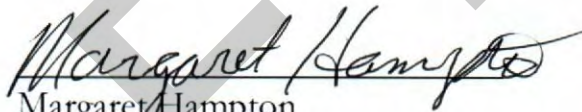
We also would like to convey our appreciativeness for the programs provided by the Housing Authority of Gloucester County.

We look forward to working with you in the future.

Sincerely,



Ed Wengert
Chairman
Public Housing-Deptford Park



Margaret Hampton
Secretary
Section 8 Housing Choice Voucher