



HOUSING AUTHORITY OF GLOUCESTER COUNTY

INDEX OF ATTACHMENTS

5-YEAR PLAN (2025-2029)

HUD-50075

The following is an index of files attached to the 5-Year PHA Plan for 2025-2029 and the corresponding reference to the appropriate section of the form.

- B.1** **Mission.** See attached Missions Statement.
- B.2** **Goals and Objectives.** See attached Goals and Objectives for the next 5 years.
- B.3** **Progress Report.** See attached Progress Report on prior 5-year goals and objectives.
- B.4** **Violence Against Women Act (VAWA) Goals.** See attached VAWA Policy and Emergency Transfer Plan containing HAGC's policies that enable HAGC to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.
- C.1** **Significant Amendment or Modification.** See attached definition of Significant Amendment or Modification.
- C.2** **Resident Advisory Board (RAB) Comments.** See attached letter from the RAB to the HAGC Board of Commissioners containing comments of the RAB.
- C.3** **Certification by State or Local Official.** See attached HUD Form 50077-SL.
- C.4** **Challenged Elements.** The Public has not challenged any elements of the Plan.
- D.1** **Affirmatively Furthering Fair Housing.** Not Applicable.

HOUSING AUTHORITY OF GLOUCESTER COUNTY

5-YEAR PLAN (2025-2029)

B.1 MISSION STATEMENT

The Mission of the Housing Authority of Gloucester County is to provide quality affordable housing opportunities to those not adequately served 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 scale in the operation of the development and provision of services. Housing for families, particularly those with children, will be provided on 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

5-YEAR PLAN (2025-2029)

B.2 GOALS AND OBJECTIVES

Goal One: Preserve the economic vitality of the Housing Authority of Gloucester County (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 (RAD) Program. HAGC shall apply to the RAD Program upon completion of the disposition of HAGC scattered sites as discussed under Objective #2 below. HAGC shall 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. 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 HAGC's Section 8 Program in an efficient and effective manner.

Objectives:

1. HUD shall continue to recognize HAGC as at least a standard performer in accordance with the 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 if sufficient funding
 - 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 Housing Assistance Payment (HAP) 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. The waiting list will be administered based on time and date of application with the following preference: applicants living or working, or who have been hired to work, within Gloucester County; for applicants meeting the definition of eligibility for the mainstream voucher preference; for veterans satisfying the eligibility requirements set forth in HAGC's Administrative Plan; and leasing-in-place.
 4. HAGC 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. HAGC 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 HAGC.

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

Objectives:

1. HAGC shall have five (5) Section 8 HCV Homeownership closings by 2029. Through the successful operation of the Homeownership Program, HAGC shall continue to prepare families for homeownership and economic independence.
2. HAGC shall pursue other development opportunities.

- a) In 2019, HAGC awarded 21 PBVs to WinnDevelopment for their project known as the West Deptford Apartments located at 420 Grove Avenue, West Deptford, New Jersey. This Project is comprised of 84 affordable one-bedroom and two-bedroom units, all reserved for households aged 55 and older. This Project is funded through a combination of private funding, LIHTC and NJEDA ASPIRE Tax Credits. 50% of the units are set aside as supportive housing for veterans. Construction on this Project is estimated to begin in the fourth quarter of 2024.
 - b) In 2024, HAGC intends to issue a Request For Proposals for both Project Based Vouchers (PBV) and HUD-Veterans Affairs Supportive Housing (VASH) to provide additional assisted housing opportunities within the County of Gloucester.
 - c) HAGC intends on offering bond financing to developers to provide gap funding for assisted housing development within the County of Gloucester.
 - d) HAGC is exploring opportunities to construct, own and manage assisted housing developments within the County of Gloucester to provide additional housing opportunities.
3. HAGC shall continue to 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. HAGC shall implement additional local preferences including a homeless preference and a displacement preference.

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

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 Act requirements, respond timely to communications from residents and facilitate the Resident Advisory Board (RAB) meetings.
2. Maintain a cooperative relationship with an organization in the County providing self-sufficiency services to HAGC assisted families. HAGC shall evaluate and maintain partnership with third party agencies which offer services 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 (ROSS) Program, Congregate Program and relationships with third-party service providers.

HOUSING AUTHORITY OF GLOUCESTER COUNTY

5-YEAR PLAN (2025-2029)

B.3 PROGRESS REPORT

Goal One: **Preserve the economic vitality of the Housing Authority of Gloucester County (HAGC).**

Objectives:

1. Preserve HAGC's Public Housing units located at Deptford Park Apartments and Carino Park Apartments 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.

Progress: In accordance with resolutions from HAGC's Board of Commissioners executed on July 28, 2021, HAGC determined it is in the best interest of HAGC to withdraw the RAD applications for Deptford Park Apartments and Carino Park Apartments and rescind the Commitment to Enter into Housing Assistance Payments (CHAP) RAD award. In accordance with HUD-PIH Notice 2021-07 (HA), HAGC has determined that the RAD conversion must occur after the disposition of the 62 scattered site public housing single family homes, as detailed below. HAGC will reevaluate the RAD conversion following such disposition.

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 is consistent with the goals of HAGC. 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 scattered site Public Housing to ensure protections for residents.

Progress: HAGC requested the County's Consultant to prepare the Part 50 ERR which is a required component of the disposition application. Gloucester County is the Responsible Entity and must sign off on the ERR. Due to the Covid-19 pandemic and potential housing instability resulting from the disposition plan, HAGC delayed the disposition from 2020 through 2022. HAGC re-engaged in this process with the Resident Advisory Board (RAB) in May 2023. Once the RAB approved the disposition of NJ 204-1, a public hearing was advertised for and conducted on July 12, 2023. HAGC revised its 2023 Annual Plan to include the disposition of the NJ 204-1 Scattered Site, Single Family Public Housing Program, subject

to the Public Hearing. HAGC awarded a contract for appraisal services in June 2024. HAGC intends to file the disposition application by December 31, 2024. HAGC is conducting meetings with the NJ204-1 Scattered Site residents to re-engage and inform the residents of HAGC's intent to dissolve the program, how the residents will be assisted with Tenant Protection Vouchers provided they remain in good standing, and any other options available such as homeownership.

Goal Two: Manage HAGC's Section 8 Program in an efficient and effective manner.

Objectives:

1. HUD shall continue to recognize HAGC as at least a standard performer in accordance with the current Section Eight Management Assessment Program (SEMAP) 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 applicable housing quality standards before families enter into leases and HAGC enters 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 if sufficient funding
 - 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

Progress: HAGC was designated as a High Performer for FYE 12/31/23 and therefore exceeded this objective. HAGC conducted internal SEMAP testing which revealed compliance with program obligations consistent with the High Performer Designation. HAGC places a strong priority on compliance with federal regulations governing the Housing Choice Voucher Program and continues to engage in review of HUD publications to access required changes and/or develop program efficiencies to best serve the Section 8 participants and community of Gloucester County.

2. HAGC shall obtain a HAP utilization rate of 95% or higher in its tenant-based program.

Progress: HAGC continues to prioritize voucher utilization and lease up. However, the Covid-19 pandemic created a lasting hardship and barriers towards improving the utilization rate. In order to increase utilization, HAGC has increased data gathering and tracking, hired an additional Intake Tenant Interviewer/Investigator (TII), employed a new intake procedure for conducting eligibility interviews, increased utilization of technology including video webcast

tenant briefings, telephone interviews, explored community partnerships for security deposit assistance, engaged in landlord communications and continued to review applicable HUD guidance. HAGC staff works diligently to verify eligible applicants and provide housing search assistance to voucher holders. Despite these efforts, eligible applicants often have a difficult time locating affordable housing and obtaining security and/or utility deposits. HAGC has verified through an Open Public Records Request that the New Jersey Department of Community Affairs (NJDCA) has approximately 230 Housing Choice Vouchers under lease in HAGC's operating jurisdiction which significantly impacts HAGC's ability to achieve its utilization goal. HAGC continues to extend voucher search time to those who have difficulties finding units to avoid voucher expirations.

As of June 30, 2024, the HAP utilization rate was 105% and unit utilization rate was 79% for regular HCVs; the HAP utilization was 105% and unit utilization was 100% for Mainstream Vouchers.

HAGC implemented the Lease-In-Place preference to assist with increased unit utilization.

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. 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.

Progress: HAGC continues to monitor the waiting list to ensure accurate applicant selection and sufficient applicant pool. HAGC opened the Section 8 Waitlist from 2/21/2024 until 2/24/2024 and entered into the electronic database all applications for housing assistance submitted during the waiting list opening. HAGC continues to implement the waiting list with a local preference and a preference for those meeting the eligibility requirement for a Mainstream Voucher (disabled adults), Homelessness and Domestic Violence Victims. The waiting lists remain closed except for the Section 8 Mainstream preference and the Section 8 Veterans Only waiting list, which remains open for Veterans, a Veteran's surviving spouse or a family member of a Veteran, who is both the primary residential caregiver and is residing with the Veteran, with a DD214, NGB-22 or any government issued record evidencing the type of discharge from service is other than dishonorable.

4. HAGC 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. HAGC shall properly implement the Small Area Fair Market Rent (SAFMR) 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 HAGC.

Progress: HAGC increased all Payment Standards up to 110% of the FY 2023-2024 SAFMRs. Further, as authorized by 24 CFR 982.503, HAGC also continues to utilize a higher payment standard as a reasonable accommodation up to and including 120% of the published FMR for families that include a person with a disability.

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

Objectives:

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

Progress: Currently there are 4 voucher participants in the Section 8 Housing Choice Voucher Homeownership program in various communities throughout Gloucester County, and since 2019, 18 participants have achieved self-sufficiency HAGC is conducting intakes for new participants. Financial education is used to assist clients in obtaining the goal of becoming a homeowner. HAGC works closely with the approved individuals to facilitate the process of closing and finalizing homeownership. HAGC continues to observe that the Covid-19 pandemic has made homeownership more difficult due to increased home prices and market competitiveness.

2. HAGC 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.

Progress: HAGC continues to focus on the expansion of quality affordable housing available for veterans and passed a resolution authorizing the execution of a Housing Assistance Payments Contract to offer project-based vouchers for veterans. The developer of the West Deptford Apartments Project anticipates receiving final approval of both NJHMFA 4% LIHTC and NJEDA ASPIRE Tax Credits by August 2024. HAGC has awarded 21 PBVs to this project, these units will be restricted to Veterans whose income is at or below 30% of the median income for Gloucester County.

HAGC is also focused on the expansion of housing opportunities for individuals with special needs and HAGC has partnered with Rowan College of South Jersey, Deptford Township, and Gloucester County to develop a new 24 one-bedroom unit midrise apartment building for individuals with special needs. The building will house individuals with developmental and/or intellectual disabilities and is located at the Gloucester County Campus of Rowan College of South Jersey. The location of the housing will allow the residents to benefit from supportive services on the campus and will be designed to serve the needs of the residents. The building will also be equipped with on-site office space for both property management and supportive services, meeting spaces, laundry facilities, recreational community room and lounge spaces, and an outdoor recreational area. HAGC has awarded 24 Project Based Vouchers to the project, ensuring 100% of the units will be affordable to residents at or below 50% of Area Median Income of Gloucester County. Site work began on the project in November 2023 with building construction beginning in January 2024.

3. HAGC shall continue to implement a housing program benefiting families in danger of becoming homeless. HAGC shall continue to successfully operate the HOME funds for the County of Gloucester and the HUD-VASH program in partnership with the Philadelphia VA to provide housing assistance to homeless veterans referred by the VA.

Progress: HAGC is administering HOME funds for the County of Gloucester. The Gloucester County Board of Social Services refers families in danger of becoming homeless to HAGC. These families are unable to obtain services from other organizations throughout the County. Currently 26 families are on the wait list for HOME funds and 5 families are under contract and receiving assistance.

HAGC also maintains Targeted Section 8 Housing Choice Vouchers for eligible applicants who are homeless or imminently homeless. Additionally, the Diocesan Housing Services Corporation of the Diocese of Camden, through the HUD 202 program, requested Project Based Vouchers (PBVs) in the Section 8 Housing Choice Voucher Program administered by the HAGC, these vouchers will support seniors (age 55+) who are homeless or are facing the threat of homelessness. HAGC initially awarded 5 PBVs to the Mews at St. Mary Project, located in Monroe Township, NJ and increased the award to up to 12 PBVs on August 23, 2023. The AHAP was executed in June 2024 for 5 PBVs.

HAGC administers 24 Veterans Affairs Supportive Housing Choice Vouchers (HUD-VASH) for homeless Veterans in partnership with the Philadelphia VA. In May 2023, the VA provided a letter of support for HAGC to apply for additional VASH Vouchers and HAGC submitted the registration of interest to HUD on 6/1/23. HUD awarded an additional 10 VASH Vouchers. HAGC accepted the additional award on 8/10/23 for a total of 34 HUD-VASH Vouchers.

HAGC was also awarded funding through the 2018 Mainstream Voucher Program 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. As a result of increased funding from the CARES Act, HAGC was awarded additional Housing Assistance Payment funding from HUD to support additional Mainstream Vouchers which began leasing effective October 2020. HAGC applied for, and was awarded, 30 additional Mainstream Vouchers, effective 11/01/2022 and the current allocation is now 85.

In 2024, HAGC amended its Section 8 Administrative Plan to provide a veteran's preference for HAGC's HCV Program to provide additional housing opportunities for veterans.

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

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 Meetings Act requirements, respond timely to communications from residents and facilitate the Resident Advisory Board meetings.

Progress: 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. HAGC has provided several written notices and monthly newsletters to connect residents with resources, supportive services and various activities facilitated by HAGC, as well as ask for suggestions for activities in which the residents would be interested in participating. HAGC has maintained and updated HAGC's website with Board of Commissioner meeting agendas, minutes, and resolutions; current policies governing the administration of HAGC's housing programs and providing an opportunity to apply for program assistance online. HAGC has timely addressed resident questions and/or complaints submitted to HAGC staff and management.

2. Maintain a cooperative relationship with an organization in the County providing self-sufficiency services to HAGC assisted families. HAGC shall evaluate and maintain partnership with third party agencies which offer services to residents.

Progress: HAGC maintains cooperative relationships with third party agencies in the community 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. As HAGC receives new referrals, applicants are placed on shortened targeted waitlists, from where applicants are contacted to begin the process of eligibility determinations on an ongoing basis, and as funding allows. 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 which has proven to be highly successful. HAGC also administers the Family Self-Sufficiency (FSS) Program to promote the development of local strategies to coordinate public and private resources that help HCV Program participants, Public Housing tenants, and tenants in the Section 8 Project-Based Rental Assistance (PBRA) Program obtain employment that will enable participating families to achieve economic independence and reduce dependence on welfare assistance and rental subsidies.

3. Promote independence and aging in place for elderly and disabled Public Housing residents through the operation of the Resident Opportunity for Self-Sufficiency (ROSS) Program, Congregate Program, and relationships with third-party service providers.

Progress: HAGC operates a Resident Opportunities and Self-Sufficiency (ROSS) program which focuses on the goal of providing supportive services to enable disabled and elderly residents to remain living independently and age in place rather than require institutionalized placement. The ROSS Program provided case management services to promote financial literacy, food and nutrition services, referral of health care services, mental health services and wellness programs. The ROSS Program also has the objective of promoting job training and mentoring programs for disabled and elderly persons through employment and career counseling and economic self-sufficiency training. The successful operation of the ROSS Program depends largely on partnering with community-based organizations.

HAGC's 3-year ROSS grant will expire next year. The NOFO for the next grant period was released and HAGC will apply to continue the Program. The deadline is September 30, 2024.

Further tenancy support for disabled Public Housing residents is provided through the establishment of a special needs list through the Register Ready Program. This voluntary program allows residents of HAGC owned and managed buildings to self-identify as individuals requiring assistance from emergency responders in the event of an emergency. This information is held securely by the State of New Jersey and HAGC and only used for emergency response and planning. HAGC assists residents with completing Register Ready forms and updates.

In 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. 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 Services Program is supplemented and enhanced by an Assisted Living Provider, DPSP, who provides on-site services to individuals who are often disabled. HAGC has partnered with DPSP since 2013 and maintains space in HAGC's affordable housing buildings. DPSP is a licensed Assisted Living Program with 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 institutional facility.

HAGC will be executing an agreement with Inspira LIFE, which will provide senior residents with another opportunity for community-based services to extend their independence and promote aging in place.

HOUSING AUTHORITY OF GLOUCESTER COUNTY

5-YEAR PLAN (2025-2029)

B.4 VAWA GOALS

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 *C.F.R.* Part 5, subpart L.

HOUSING AUTHORITY OF GLOUCESTER COUNTY (HAGC)

VIOLENCE AGAINST WOMEN ACT (VAWA) POLICY

I. Purpose and Applicability:

This Violence Against Women Act Policy ("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 or 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 *C.F.R.* Part 5, Subpart L, Protections for Victims of Domestic Violence, Dating Violence, Sexual Assault or Stalking as well as various subparts of 24 *C.F.R.* 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 HAGC'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, dating violence, sexual assault or stalking who are assisted by HAGC;
- C. Providing and maintaining housing opportunities for victims of domestic violence, dating violence, sexual assault or stalking;
- D. Cooperating, with others, by sharing information and maintaining collaborative arrangements between HAGC, law enforcement authorities, victim services providers, and

others to promote the safety and well-being of victims of actual and threatened domestic violence, dating violence, sexual assault or stalking, who are assisted by HAGC; and

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

III. **Definitions:**

HAGC shall implement all definitions as established in 24 *C.F.R.* §5.2003.

IV. **Admissions and Screening:**

Non-Denial of Assistance. HAGC will not deny admission to 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 otherwise qualified for admission. Further, HAGC will not deny admission 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 HAGC 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 HAGC:

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 HAGC 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, HAGC 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:

- (a) 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, sexual assault or stalking in question against the tenant or an affiliated individual of the tenant. However, in taking any such action, HAGC shall not apply a more demanding standard to the victim of domestic violence, dating violence, sexual assault or stalking than that applied to other tenants.
 - (b) Nothing contained in this Policy shall be construed to limit HAGC's ability to evict or terminate from assistance any tenant or lawful applicant if HAGC 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, HAGC must have objective evidence of words, gestures, actions or other indicators of such threats. Any eviction or termination of assistance, predicated on this basis should be utilized by HAGC 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, HAGC 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 affected in accordance with the procedures prescribed by law applicable to terminations of tenancy and evictions by HAGC. In the event of Lease Bifurcation, remaining family members must meet statutory requirements for housing assistance.

VI. Verification of Domestic Violence, Dating Violence, Sexual Assault or Stalking:

- A. Requirement for Verification. HAGC shall require verification in all cases where an individual claims protection against an action involving such individual proposed to be taken by HAGC. Verification of a claimed incident or incidents of actual or threatened domestic violence, dating violence, sexual assault or stalking may be accomplished by providing to HAGC one of the following types of documentation:
 - 1. Form HUD-5382;

2. A document signed by the claimant and an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional from whom the claimant has sought assistance relating to domestic violence, dating violence, sexual assault or stalking, or the effects of the abuse. The document must specify, under penalty of perjury (28 U.S.C. 1746), that the professional believes the incident or incidents of domestic violence, dating violence, sexual assault or stalking occurred and meet the definition of “domestic violence,” “dating violence,” “sexual assault” or “stalking” in HUD’s regulations at 24 C.F.R. §5.2003;
3. A record of a federal, state, tribal, territorial, or local law enforcement agency, court, or administrative agency that documents the incident or incidents of domestic violence, dating violence, sexual assault or stalking. Examples of such records include police reports, protective orders, and restraining orders, among others; or
4. At the discretion of HAGC, a statement or other evidence provided by the applicant or tenant.

HAGC may ask for clarification or additional information in order to make an objectively reasonable determination of whether the adverse factor is a direct result of the applicant or tenant 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, sexual assault or stalking, and who is requested by HAGC to provide verification, must provide such verification within fourteen (14) business days (i.e., fourteen (14) calendar days, excluding Saturdays, Sundays, and federally recognized holidays) after receipt of the request for verification. HAGC 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. HAGC 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 designee, and generally in such cases where HAGC is otherwise aware of the abuse 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. HAGC 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 stalking and the information in one person’s documentation conflicts with the information in another person’s documentation or submitted documentation contains information that conflicts with existing information already available to HAGC. When

evicting or terminating one household member, HAGC shall follow family break up policies and the HAGC's Grievance Policy.

VII. Confidentiality:

- A. Right of Confidentiality. All information (including the fact that an individual is a victim of domestic violence, dating violence, sexual assault or stalking) provided to HAGC in connection with a verification required by 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 proceedings or in connection with termination of assistance, as permitted under VAWA; or 3. otherwise required by applicable law. HAGC 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. HAGC 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 HAGC's policy to honor orders entered by courts of competent jurisdiction affecting individuals assisted by HAGC. 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.

IX. Relationships with Service Providers:

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

Housing Authority of Gloucester County

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

Emergency Transfers

The Housing Authority of Gloucester County (HAGC) 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, HAGC allows tenants who are victims of domestic violence, dating violence, sexual assault or stalking to request an emergency 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 orientation². The ability of HAGC 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 HAGC 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 ensures HAGC'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 C.F.R. 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.

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.

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.

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

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

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 HAGC'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.

HAGC shall retain records of all emergency transfer requests and their outcomes for three (3) years or for a period of time as specified in the program regulations.

Confidentiality

HAGC will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives HAGC 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 more information about HAGC'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

HAGC 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. HAGC 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. HAGC 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, HAGC has no safe and available units for which a tenant who needs an emergency transfer is eligible, HAGC 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, HAGC 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)

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NOTICE OF OCCUPANCY RIGHTS UNDER
THE VIOLENCE AGAINST WOMEN ACT

U.S. Department of Housing and Urban Development
OMB Approval No. 2577-0286
Expires 06/30/2017

Form HUD-5380
(12/2016)

The Housing Authority of Gloucester County

Notice of Occupancy Rights under the Violence Against Women Act

To all Tenants and Applicants

The Violence Against Women Act (VAWA) provides protections for victims of domestic violence, dating violence, sexual assault or stalking. VAWA protections are not only available to women but are available equally to all individuals regardless of sex, gender identity, or sexual orientation¹. The U.S. Department of Housing and Urban Development (HUD) is the federal agency that oversees that The Housing Authority of Gloucester County (HAGC) is in compliance with VAWA. This notice explains your rights under VAWA. A HUD-approved certification form is attached to this notice. You can fill out this form to show that you are or have been a victim of domestic violence, dating violence, sexual assault or stalking, and that you wish to use your rights under VAWA.

Protections for Applicants

If you otherwise qualify for assistance with HAGC, you cannot be denied admission or denied assistance because you are or have been a victim of domestic violence, dating violence, sexual assault or stalking.

Protections for Tenants

If you are receiving assistance with HAGC you may not be denied assistance, terminated from participation, or be evicted from your rental housing because you are or have been a victim of domestic violence, dating violence, sexual assault or stalking. Also, if you or an affiliated individual of yours is or has been the victim of domestic violence, dating violence, sexual assault or stalking by a member of your household or any guest, you may not be denied rental assistance or occupancy rights with HAGC solely on the basis of criminal activity directly relating to that domestic violence, dating violence, sexual assault or stalking. Affiliated individual means your spouse, parent, brother, sister, or child, or a person to whom you stand in the place of a parent or guardian (for example, the affiliated individual is in your care, custody, or control); or any individual, tenant, or lawful occupant living in your household.

¹ 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.

Removing the Abuser or Perpetrator from the Household

HAGC may divide (bifurcate) your lease in order to evict the individual or terminate the assistance of the individual who has engaged in criminal activity (the abuser or perpetrator) directly relating to domestic violence, dating violence, sexual assault or stalking.

If HAGC chooses to remove the abuser or perpetrator, HAGC may not take away the rights of eligible tenants to the unit or otherwise punish the remaining tenants. If the evicted abuser or perpetrator was the sole tenant to have established eligibility for assistance under the program, HAGC must allow the tenant who is or has been a victim and other household members to remain in the unit for a period of time, in order to establish eligibility under the program or under another HUD housing program covered by VAWA, or, find alternative housing.

In removing the abuser or perpetrator from the household, HAGC must follow federal, state, and local eviction procedures. In order to divide a lease, HAGC may, but is not required to, ask you for documentation or certification of the incidences of domestic violence, dating violence, sexual assault or stalking.

Moving to Another Unit

Upon your request, HAGC may permit you to move to another unit, subject to the availability of other units, and still keep your assistance. In order to approve a request, HAGC may ask you to provide documentation that you are requesting to move because of an incidence of domestic violence, dating violence, sexual assault or stalking. If the request is a request for emergency transfer, the housing provider may ask you to submit a written request or fill out a form where you certify that you meet the criteria for an emergency transfer under VAWA. The criteria are:

- (1) You are a victim of domestic violence, dating violence, sexual assault or stalking.** If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault or stalking, your housing provider may ask you for such documentation, as described in the documentation section below.
- (2) You expressly request the emergency transfer.** Your housing provider may choose to require that you submit a form or may accept another written or oral request.
- (3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit.** This means you have a reason to fear that if you do not receive a transfer, you would suffer violence in the very near future.

OR

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency

transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you expressly request the transfer.

HAGC will keep confidential requests for emergency transfers by victims of domestic violence, dating violence, sexual assault or stalking, and the location of any move by such victims and their families.

HAGC emergency transfer plan provides further information on emergency transfers, and HAGC must make a copy of its emergency transfer plan available to you if you ask to see it.

Documenting You Are or Have Been a Victim of Domestic Violence, Dating Violence, Sexual Assault or Stalking

HAGC can, but is not required to, ask you to provide documentation to “certify” that you are or have been a victim of domestic violence, dating violence, sexual assault or stalking. Such request from HAGC must be in writing, and HAGC must give you at least fourteen (14) business days (Saturdays, Sundays, and federal holidays do not count) from the day you receive the request to provide the documentation. HAGC may, but does not have to, extend the deadline for the submission of documentation upon your request.

You can provide one of the following to HAGC as documentation. It is your choice which of the following to submit if HAGC asks you to provide documentation that you are or have been a victim of domestic violence, dating violence, sexual assault or stalking.

- A complete HUD-approved certification form given to you by HAGC with this notice, that documents an incident of domestic violence, dating violence, sexual assault or stalking. The form will ask for your name, the date, time, and location of the incident of domestic violence, dating violence, sexual assault or stalking, and a description of the incident. The certification form provides for including the name of the abuser or perpetrator if the name of the abuser or perpetrator is known and is safe to provide.
- 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.
- A statement, which you must sign, along with the signature of an employee, agent, or volunteer of a victim service provider, an attorney, a medical professional or a mental health professional (collectively, “professional”) from whom you sought assistance in addressing domestic violence, dating violence, sexual assault or stalking, or the effects of abuse, and with the professional selected by you attesting under penalty of perjury that he or she believes that the incident or incidents of domestic violence, dating violence, sexual assault or stalking are grounds for protection.
- Any other statement or evidence that HAGC has agreed to accept.

If you fail or refuse to provide one of these documents within the fourteen (14) business days, HAGC does not have to provide you with the protections contained in this notice.

If HAGC receives conflicting evidence that an incident of domestic violence, dating violence, sexual assault or stalking has been committed (such as certification forms from two or more members of a household each claiming to be a victim and naming one or more of the other petitioning household members as the abuser or perpetrator), HAGC has the right to request that you provide third-party documentation within thirty (30) calendar days in order to resolve the conflict. If you fail or refuse to provide third-party documentation where there is conflicting evidence, HAGC does not have to provide you with the protections contained in this notice.

Confidentiality

HAGC must keep confidential any information you provide related to the exercise of your rights under VAWA, including the fact that you are exercising your rights under VAWA. HAGC must not allow any individual administering assistance or other services on behalf of HAGC (for example, employees and contractors) to have access to confidential information unless for reasons that specifically call for these individuals to have access to this information under applicable federal, state or local law. HAGC must not enter your information into any shared database or disclose your information to any other entity or individual. HAGC, however, may disclose the information provided if:

- You give written permission to HAGC to release the information on a time limited basis.
- HAGC needs to use the information in an eviction or termination proceeding, such as to evict your abuser or perpetrator or terminate your abuser or perpetrator from assistance under this program.
- A law requires HAGC or your landlord to release the information.

VAWA does not limit HAGC's duty to honor court orders about access to or control of the property. This includes orders issued to protect a victim and orders dividing property among household members in cases where a family breaks up.

Reasons a Tenant Eligible for Occupancy Rights under VAWA May Be Evicted or Assistance May Be Terminated

You can be evicted, and your assistance can be terminated for serious or repeated lease violations that are not related to domestic violence, dating violence, sexual assault or stalking committed against you. However, HAGC cannot hold tenants who have been victims of domestic violence, dating violence, sexual assault or stalking to a more demanding set of rules than it applies to tenants who have not been victims of domestic violence, dating violence, sexual assault or stalking.

The protections described in this notice might not apply, and you could be evicted, and your assistance terminated, if HAGC can demonstrate that not evicting you or terminating your assistance would present a real physical danger that:

1. Would occur within an immediate time frame, and
2. Could result in death or serious bodily harm to other tenants or those who work on the property.

If HAGC can demonstrate the above, HAGC should only terminate your assistance or evict you if there are no other actions that could be taken to reduce or eliminate the threat.

Other Laws

VAWA does not replace any federal, state, or local law that provides greater protection for victims of domestic violence, dating violence, sexual assault or stalking. You may be entitled to additional housing protections for victims of domestic violence, dating violence, sexual assault or stalking under other federal laws, as well as under state and local laws.

Non-Compliance with The Requirements of This Notice

You may report a covered housing provider's violations of these rights and seek additional assistance, if needed, by contacting or filing a complaint with HUD.

For Additional Information

You may view a copy of HUD's final VAWA rule at <https://www.gpo.gov/fdsys/pkg/FR-2016-11-16/pdf/2016-25888.pdf> Additionally, HAGC must make a copy of HUD's VAWA regulations available to you if you ask to see them.

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>.

HOUSING AUTHORITY OF GLOUCESTER COUNTY

5-YEAR PLAN (2025-2029)

C.1 SIGNIFICANT AMENDMENT OR MODIFICATION

Significant Amendments or Modifications from the 5 Year Plan shall be defined as discretionary changes in HAGC plans or policies that fundamentally change the mission, goals, objectives, or plans of HAGC 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; changes to the financing structure for each approved RAD conversion and routine updates to the FSS Action Plan.

DRAFT



HOUSING AUTHORITY OF GLOUCESTER COUNTY

RESIDENT ADVISORY BOARD

August 8, 2024

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

Re: Annual Agency Plan for FY 2025 & Five Year Plan FY 2025-2029

Dear Board of Commissioners:

The Resident Advisory Board (RAB) has reviewed and considered the various plan elements comprising the Housing Authority of Gloucester County's (HAGC) Annual Agency Plan for FY 2025 & 5-Year Plan for FY 2025-2029 (the Annual Plan and 5-Year Plan may collectively be referred to herein as the "Plan"). The RAB met with HAGC staff on the following days: May 30, 2024; June 13, 2024; June 27, 2024; July 11, 2024; July 25, 2024, and August 8, 2024. The RAB has carefully reviewed the information provided to us and we support the following:

1. HAGC's Annual Agency Plan for FY 2025, Five Year Plan FY 2025-2029 and associated Plan elements.
2. HAGC's Mission to provide quality affordable housing opportunities to those not adequately served by private/unsubsidized organizations in Gloucester County.
3. HAGC's Section 8 Administrative Plan (Admin Plan) and the Admission and Continued Occupancy Policy (ACOP) for the administration and management of the Section 8 Housing Choice Voucher program and the Public Housing program, respectively. These policies contain procedures, guidance, and more information about protections under federal laws, including the Americans with Disabilities Act of 1990 and VAWA, for the administration of their programs.
4. HAGC's goal to increase the number of affordable housing opportunities available to low-income residents of Gloucester County. Specifically, we support focusing on Section 8 voucher utilization, pursuing new housing development opportunities, supporting the homeownership program, and implementing housing programs benefiting families in danger of homelessness.

The RAB also suggests the following recommendations to the Plan. We understand recommendations are incorporated into the Plan where applicable.

1. Public Housing – Carino & Deptford Park Apartments, Scattered Sites Homes:

- Members of the RAB are in support of HAGC proceeding with the submission of the Public Housing Scattered Site disposition application.
- Members of the RAB are especially in favor of the preference for occupancy of both Carino Park and Deptford Park to elderly (62) or near-elderly (50-62) disabled households. We believe the multi-family buildings should exclusively house elderly and near-elderly disabled families and would support any request made by HAGC to maintain this preference. Further, RAB members strongly support an exclusive designation limiting occupancy for these buildings to elderly (62) or near-elderly disabled households.
- Members of the RAB report benefiting from HAGC's resident newsletters containing updates about program operations for the senior buildings.
- Members of the RAB support HAGC's continued efforts through the ROSS program which provides self-sufficiency, educational and social services for its PH participants. Further, the RAB encourages HAGC to apply and renew the program when applicable.
- Members of the RAB support HAGC's Congregate Program offering laundry, housekeeping, shopping services and meals to residents to help age in place and maintain independence. Further, the RAB continually supports HAGC's annual application to renew the Congregate Program grant when applicable.
- Members of the RAB support HAGC's continued partnership with Assisted Living Providers who are able to serve the unique medical needs of residents.
- Members of the Board wish to expand resident services and programs including: the installation of television channels in the community rooms, added senior trips and activities for all buildings and expanded outdoors games and activities.
- Members of the RAB are in support of HAGC amending the ACOP to comply with the Housing Opportunity Through Modernization Act (HOTMA) accordingly.

2. Agency Wide:

- HAGC's intention to move the Public Housing Scattered Site Waitlist to the Housing Choice Voucher Waitlist to allow Public Housing Scattered Site applicants to maintain their application date and time.
- Members of the RAB support HAGC amending the Admin Plan to include a local preference for applicants that are homeless or at risk of homelessness.
- Members of the RAB support HAGC amending the Admin Plan to include a local preference for residents displaced by the Public Housing Scattered Site disposition.

- Members of the RAB are in favor of HAGC's Grievance Policy, as applicable to the Section 8 HCV and Public Housing programs. The members of the RAB also support amending the Grievance Policy to remove the internal appeal process.
- Members of the RAB support HAGC's continued efforts through the FSS programs and Homeownership programs, which provide self-sufficiency and educational support for participants. Further, the RAB encourages HAGC to apply and renew these programs when applicable, while seeking other self-sufficiency opportunities that can benefit participating low and extremely low-income households.
- Members of the RAB support the implementation of HAGC's Violence Against Women Act (VAWA) Policy and Emergency Transfer Plan to ensure the proper protections, confidentiality and notices are provided to all persons who are victims of domestic violence, dating violence, sexual assault, and stalking.
- Members of the RAB support HAGC's intention to review all resident leases to ensure there are provisions within the lease that prevent tenants from engaging in egregious behavior and strengthen HAGC's eviction process regarding disrespectful tenants when needed to ensure the environment is safe for staff and residents.
- Members of the RAB support the One Strike and You're Out policy which prohibits program applicants and participants from engaging in certain drug-related, violent, and criminal activity. Each individual case of denial or termination is evaluated on a case-by-case basis. The RAB supports HAGC amending the ACOP in order to comply with proposed federal laws similar to New Jersey's Fair Chance in Housing Act (FCHA), when applicable and if necessary, considering the implementation of FCHA.
- Members of the RAB support HAGC issuing utility payments directly to utility suppliers.
- Members of the RAB support HAGC in pursuing rent collections and when all other options have failed, the RAB supports pursuing eviction in accordance with the law.

We understand that the above comments and suggestions, when appropriate, have been included in the Plan. We also would like to convey our gratitude for the programs provided by the Housing Authority of Gloucester County.

We look forward to working with you in the future.

Sincerely,



Chairperson



C.3 Certification by State of Local Official.
HUD FORM 50077-SL

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