

PHA Annual Plan 2016	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 4/30/2011
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Annual PHA Plan for Fiscal Year: 2016

THE HOUSING AUTHORITY OF THE CITY OF NEW CANAAN

Public Comment Version August 31st 2015

6.0	<p>PHA Plan Update</p> <p>N/A FOR QUALIFIED PHAs.</p> <p>(a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission:</p> <p>(b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions.</p> <p>New Canaan Housing Authority Site Office – 57 Millport Avenue, New Canaan, CT 06840 Norwalk Housing Authority – 21 ½ Monroe Street S. Norwalk CT 06854</p> <p>The Plan will also be provided at the Town Clerk’s Office in the New Canaan Town Hall</p>
7.0	<p>Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. <i>Include statements related to these programs as applicable.</i></p> <p>N/A FOR QUALIFIED PHAs.</p> <p>However, the New Canaan Housing Authority has submitted a RAD Plan which will involve mixed financing, demolition, disposition and conversion and which will include relocation during 2016 and 2017. The current Plan will result in tenants being offered temporary relocation into a new building currently being constructed next to the existing site which will be available for occupancy in 2016. The Plan then calls for the demolition of the existing public housing and the construction of a RAD approved building. Upon completion of this second phase expected in the period 2016-2017, the tenants will then be relocated into this new replacement housing.</p> <p>As part of this Plan, it is expected that the current Management Agent (the Norwalk Housing Authority) will be replaced with a new Management Agent (Wynn Companies) upon approval by HUD.</p> <p>The new Management Agent will also be tasked with implementing a HUD approved Relocation Plan to implement the RAD Plan.</p>
8.0	<p>Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable.</p> <p>N/A FOR QUALIFIED PHAs.</p>
8.1	<p>Capital Fund Program Annual Statement/Performance and Evaluation Report. As part of the PHA 5-Year and Annual Plan, annually complete and submit the <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i>, form HUD-50075.1, for each current and open CFP grant and CFFP financing.</p> <p>N/A FOR QUALIFIED PHAs.</p>
8.2	<p>Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the <i>Capital Fund Program Five-Year Action Plan</i>, form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan.</p> <p>N/A FOR QUALIFIED PHAs.</p>
8.3	<p>Capital Fund Financing Program (CFFP).</p> <p><input type="checkbox"/> Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements.</p> <p>N/A FOR QUALIFIED PHAs.</p>
9.0	<p>Housing Needs. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.</p> <p>N/A FOR QUALIFIED PHAs.</p>

9.1	<p>Strategy for Addressing Housing Needs. Provide a brief description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan.</p> <p>N/A FOR QUALIFIED PHAs.</p>
10.0	<p>Additional Information. Describe the following, as well as any additional information HUD has requested.</p> <p>N/A FOR QUALIFIED PHAs.</p> <p>(a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA’s progress in meeting the mission and goals described in the 5-Year Plan.</p>

10.0	<p>(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA’s definition of “significant amendment” and “substantial deviation/modification”</p> <p>For the purposes of the New Canaan Housing Authority’s PHA Plans, the following shall constitute “substantial deviation and/or significant amendments or modifications” to these plans and therefore will be subject to the full PHA Plan planning, comment and hearing process.</p> <p>The NCHA has determined that a significant amendment or modification will only occur if a formal vote of the Board of Commissioners is required for any changes to the Capital Fund Plan which has a budgetary consequence greater than 30% and which requires a vote of the Board of Commissioners. In addition, any plan to implement a decision to demolish or dispose of a development which already requires a Public Hearing and Board approval process as well as HUD approval, will be considered a significant amendment or modification to the PHA Plan.</p>
11.0	<p>Required Submission for HUD Field Office Review. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. Note: Faxed copies of these documents will not be accepted by the Field Office.</p> <p>Items (h) and (i) are N/A FOR QUALIFIED PHAs.</p> <p>(a) Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> (which includes all certifications relating to Civil Rights) See Attachment C</p> <p>(b) Form HUD-50070, <i>Certification for a Drug-Free Workplace</i> (PHAs receiving CFP grants only) See Attachment C</p> <p>(c) Form HUD-50071, <i>Certification of Payments to Influence Federal Transactions</i> (PHAs receiving CFP grants only) See Attachment C</p> <p>(d) Form SF-LLL, <i>Disclosure of Lobbying Activities</i> (PHAs receiving CFP grants only) See Attachment C</p> <p>(e) Form SF-LLL-A, <i>Disclosure of Lobbying Activities Continuation Sheet</i> (PHAs receiving CFP grants only) See Attachment C</p> <p>(f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations. See Attachment B</p> <p>(g) Challenged Elements See Attachment B</p> <p>(h) Form HUD-50075.1, <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> (PHAs receiving CFP grants only)</p> <p>(i) Form HUD-50075.2, <i>Capital Fund Program Five-Year Action Plan</i> (PHAs receiving CFP grants only)</p>

ATTACHMENTS:

#	Attachment/Document
A	Changes to the 5 Year Plan
B	RAB List and Comments on the PHA Plan including any Challenged Elements
C	Civil Rights Certification
D	Other Required Certifications (Attached Separately)

ATTACHMENT A: CHANGES TO THE CURRENT 5 YEAR PLAN

Rental Assistance Demonstration (RAD)

The New Canaan Housing Authority is amending its Annual PHA Plan because it was a successful applicant in the Rental Assistance Demonstration (RAD). As a result, the New Canaan Housing Authority will be converting to Project Based Rental Assistance under the guidelines of PIH Notice 2012-32, REV-1 and any successor Notices. Upon conversion to Project Based Rental Assistance, the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.7 of PIH Notice 2012-32, REV-2; and Joint Housing PIH Notice H-2014-09/PIH-2014-17. These resident rights, participation, waiting list and grievance procedures are appended. Additionally, the New Canaan Housing Authority certifies that it is currently compliant with all fair housing and civil rights requirements.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing New Canaan Housing Authority with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority’s Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that New Canaan Housing Authority may also borrow funds to address their capital needs.

Below, please find specific information related to the Public Housing Development(s) selected for RAD:

<u>Name of Public Housing Project:</u>	<u>PIC Development ID:</u>	<u>Conversion type:</u>	<u>Transfer of Assistance:</u>
Millport Apartments	CT054000001	PBRA	No
<u>Total Units:</u>	<u>Pre- RAD Unit Type:</u>	<u>Post-RAD Unit Type:</u>	<u>Capital Fund allocation of Development:</u>
18 units	Family	Family	\$XXX
<u>Bedroom Type</u>	<u>Number of Units Pre- Conversion</u>	<u>Number of Units Post-Conversion</u>	<u>Change in Number of Units per Bedroom Type and Why</u>
Studio/Efficiency	0	0	N/A
One Bedroom	0	4	Revised unit configuration to meet current resident household size/need
Two Bedroom	10	10	N/A

Three Bedroom	8	4	Revised unit configuration to meet current resident household size/need
Four Bedroom	0	0	N/A
Five Bedroom	0	0	N/A
Six Bedroom	0	0	N/A

Resident Rights, Participation, Waiting List and Grievance Procedures

See Following PIH Notice 2012-32, REV-2 Section 1.7.B & Section 1.7.C, and Joint Housing/PIH Notice H-2014-09/ PIH-2014-17.

[Please note these attachments are only in the PDF version of the Plan]

Attachment B: RAB List 2015 and Comments on the PHA Plan and Challenged Elements

RESIDENT ADVISORY BOARD:

LOUISE SIMPSON

MARILYN HEWLETT

ERIC GRIFFIN

RAB Comments on PHA Plan

A meeting of the RAB was held on August 26th 2015 to discuss the upcoming PHA Plan for 2016. Attending were 8 public housing participant members and Kras Carlucchie from the NHA (the Managing Agent), David McCarthy of the Rose Companies (the RAD developer) and two members of the NCHA Board of Commissioners.

The RAB had a briefing on the proposed new RAD development which would include demolition of the existing Millport Apartments.

Issues raised will be included in the final document:

- a. Will the new Managing Agent being proposed be accessible by the residents as this is a very important issue for the residents, especially in the light of having had three different Managing Agents in three years?

NCHA Response: ????

- b. What is the timeline for the RAD development?

NCHA Response: There are two phases. Phase I will have 33 units and Phase II 40 units.

- c. What will be the parking arrangements?

NCHA Response: There will be 1.15 parking spaces per unit for a total of 124 spaces.

- d. Is it possible to use the Clubhouse area for parking?

NCHA Response: This would only result in 5 additional spaces.

- e. Will there be a play area?

NCHA Response: This is a viable option. Can do a survey to see if residents would rather have a playground than a clubhouse.

f. Will there be storage or basements?

NCHA Response: No

g. Do we get to choose our apartment?

NCHA Response: Yes. Soon there will be Relocation Plan with a notice to enable every resident to read.

There is a Public Hearing scheduled for October 15th 2015 after the mandatory 45 day comment period commencing on August 31st 2015. Any additional comments will be incorporated in the final version submitted to HUD.

Challenged Elements

None as of 8/31/2015

Attachment C: Civil Rights Certification

Civil Rights Certification. *A PHA will be considered in compliance with the Civil Rights and AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction.*

Who is applying and being selected for housing?

- a. While the waiting list is not open for significant periods of time, when it is open, the NCHA maintains statistics on protected classes who are applying and compares them with the population at large in New Canaan.
- b. When inviting applications, the NCHA advertises for housing applicants in accordance with its Affirmative Fair Housing Marketing Plan.
- c. From time to time, the NCHA will apply for housing resources to serve what it considers to be under-served populations. These resources are rarely made available, but the NCHA monitors NOFAs and responds to them accordingly.
- d. While the selection process is governed by government rules, there is some flexibility available to the NCHA to intervene to address impediments to fair housing.

2. Who is using the NCHA's housing?

- a. While the selection process is governed by government rules, there is some flexibility available to the NCHA to intervene to address impediments to fair housing.
- b. The NCHA will analyze income concentrations in developments it owns or manages and has processes which enable it to 'skip' applicants in order to enable a more balanced population distribution within a development. This is monitored quarterly.

3. Who is being provided access to ancillary services?

- a. These will be documented in the future.

4. What does the NCHA do in Terms of Promoting Fair Housing?

- a. This will be documented in the future.

5. How Does the NCHA support the State's Recommendations for Removing Impediments to Fair Housing?

STATE OF CONNECTICUT ANALYSIS OF IMPEDIMENTS DATED 2006

A. The following recommendations for action by the NCHA as presented by the State in its impediments to fair housing.

The nature of a community obviously has an effect on the type of activities which can appropriately and effectively be employed to promote fair housing. Factors such as the

town's current housing infrastructure, the size and expertise of the towns' professional staff, access to transportation, and the relative affordability of the town's housing stock, all help determine what are realistic strategies for a town to pursue.

However, the types of steps that local communities can take to encourage equal housing choice generally fall into eight broad categories. These categories are listed below. Under each category is a list of specific actions which a community **could** take to encourage greater housing choice

Fair Housing Action Plan

This creates a policy statement for the town to address and promote Fair Housing.

1. Complete an Affirmative Fair Housing Marketing Plan, which outlines actions to attract prospective buyers or tenants of all majority and minority groups in the housing market area.
2. Create a Fair Housing Policy Statement, consistent with the requirements of Section 8.37.33-311 of the Affirmative Fair Housing Marketing and Selection Procedures Manual.
3. Include a Discrimination Complaint Procedure providing for the expeditious resolution of complaints to ensure that legal options for filing complaints with enforcement agencies are not restricted.
4. Include a tenant selection methodology to determine who shall have the opportunity to apply for state-assisted housing and who shall ultimately be selected.
5. Determine Income Needed for Housing (INH) using the prescribed calculations and identify your community according to the calculation and identified categories.
6. Determine Community Classification based on the definitions provided in the Matrix for Local Fair Housing Action.
7. Categorize your community, based on steps 5 and 6 above.
8. Select Action Steps your town will take to further Fair Housing efforts from the Local Housing Strategy Matrix.

This is necessary in order for local officials to carry out fair housing requirements in the conservation and development plan.

1. Contract for direct training of town staff assigned to fair housing enforcement and complaint processing.
2. Contract for direct training of housing authority staff on fair housing laws.

3. Identify appropriate training seminars for town fair housing and social services staff to attend.
4. Gather information from organizations and agencies involved with fair housing such as DECD, CHRO, CHFA, DSS, DMHAS, HUD and private not-for-profits and distribute to all town staff which have direct contact with the public regarding housing, community development, social services or public safety matters.

NCHA Response: The NCHA already follows all 4 steps in the fair housing recommendations above for its own operations, but will work with the Town if it pursues the recommended steps.

Outreach

1. Conduct regular (at least once a year) fair housing seminars for community residents, landlords, real estate professionals and lenders.
2. Prepare and distribute materials which outline fair housing rights and responsibilities and the town's complaint and/or referral process.
3. Identify and distribute fair housing materials prepared by others to community residents, landlords, real estate professionals and lenders.

NCHA Response: The NCHA already follows all 3 steps in the recommendations above for its own operations, but will work with the Town if it pursues the recommended steps.

Complaint Processing and Monitoring

1. Assign a specific staff person to coordinate fair housing activities.
2. Develop a formal process for referring fair housing complaints to CHRO, HUD or others for investigation and follow-up.
3. Conduct initial fair housing investigation and conciliation services; make outside referrals when necessary.
4. Pass a local ordinance similar to federal fair housing laws. Then prepare and submit an application to HUD for substantial equivalency status and funding.
5. Conduct testing and monitoring of local real estate agents, landlords and lenders.

NCHA Response: The NCHA already follows steps 1 through 4 in the recommendations above for its own operations, but will work with the Town if it pursues the recommended steps.

Infrastructure Development

1. Provide model codes for urban, suburban and rural categories.
2. Review local building and zone codes, including removal of overly restrictive occupancy standards, family definitions, and density requirements.
3. Develop a formal procedure for inspecting and monitoring new construction and substantial rehabilitation for compliance with the fair housing laws, the Americans with Disabilities Act and related laws.

4. Expand access to mass transportation by developing van pools and ride sharing programs.
5. Promote inclusionary zoning through the expansion of multi-family zones.
6. Encourage the development of alternative ownership through models such as limited equity cooperatives, mutual housing, land trusts and/or turn-key projects.

NCHA Response: The NCHA already follows step 3 in the recommendations above for its own operations, but will work with the Town if it pursues the other recommended steps.

Local Financing of housing

1. Donate town land for development of lower cost multi-family housing.
2. Create a local land trust to expand the supply of affordable homeownership options.
3. Support local not-for-profits and housing partnerships in efforts to develop additional affordable housing.
4. Use the local housing authority as a vehicle for creation of affordable family rental housing.
5. Directly appropriate local funds for development of lower cost, particularly family, housing.
6. Waive impact and permit fees for affordable housing developments.
7. Seek state and federal funding for multi-family housing development.

NCHA Response: The NCHA already sold some of its land for development of additional affordable housing and is pursuing step 7. It will work with the Town if it pursues the other recommended steps.

Counseling and Other Services to Promote Diversity

1. Create or expand Section 8 and other mobility counseling programs.
2. Affirmatively market Section 8, RAP, and other rental subsidy programs through dissemination of information to local landlords.
3. Conduct a local rent survey to determine if Section 8 exception rents are necessary in town.
4. Apply to HUD for Section 8 subsidies through the local housing authority.
5. Eliminate local residency preferences within subsidized housing within the town.
6. Develop a consistent tenant selection methodology that clearly defines the criteria by which each applicant will be judged and does not exclude any protected class.

NCHA Response: The NCHA already follows step 6 in the recommendations above for its own operations. It will work with the Town if it pursues the other recommended steps. However, it does not support Step 5 and it does not utilize or have any HCV [Section 8] vouchers.

Encouragement of Private Activity

1. Encourage local lenders to adopt “second look” policies before rejecting mortgage applications.

2. Conduct regular monitoring of bank lending practices within the town.
3. Work with local landlords, real estate agents and lenders to develop affirmative marketing strategies which encourage applications from people least likely to apply based on current town demographics.
4. Encourage area lenders to develop training and monitoring programs, including self-testing of lending practices.

NCHA Response: The NCHA will work with the Town if it pursues the recommended steps.

This list does not include every fair housing activity that a community could, or should, undertake. However, it is a good starting point for increasing community awareness, ensuring that clear procedures exist for addressing fair housing complaints, expanding the types of housing choice within a community and generally providing all people with the opportunity to live in the community of their choice without discrimination.

ATTACHMENT D OTHER REQUIRED CERTIFICATIONS

Attached separately

Form HUD-50077-CR, Civil Rights Certifications

Form HUD-50077: PHA Certifications of Compliance with PHA Plans and Related Regulations

Form HUD-50070: Certification for a Drug-Free Workplace

**Form SF-LLL: Disclosure of Lobbying Activities
Disclosure of Lobbying Activities Continuation Sheet.**

Form HUD-50071: Certification of Payments to Influence Federal Transactions

Form HUD-50077-SL, Certification by State or Local Office of PHA Consistency with the Consolidated Plan