Streamlined Annual PHA Plan (High Performer PHAs)

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

OMB No. 2577-0226 Expires 03/31/2024

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

Applicability. The Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

Definitions.

- (1) *High-Performer PHA* A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers and was designated as a high performer on <u>both</u> the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) *Small PHA* A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) *Housing Choice Voucher (HCV) Only PHA* A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) *Standard PHA* A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) Troubled PHA A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

Pl	HA Information.							
	HA Name: Housing Authority C	City of Bellingham	PHA Code:	<u>WA025</u>				
PH Nu To	PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/2025 PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units 504 Number of Housing Choice Vouchers (HCVs) 1933 Total Combined 2437 PHA Plan Submission Type: Annual Submission Revised Annual Submission							
ide are the up	Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.							
wv	How the public can access this PHA Plan: The HA of the City of Bellingham (BHA) complete PHA Plan is available on the HA's website, www.bellinghamhousing.org. Residents may use PHA designated computer labs at applicable public housing properties to access the plans. Residents and the public may also view the plans at the HA's administrative office 333 N Samish Way, Bellingham, WA.							
	PHA Consortio: (Check boy if s	whatting a Jaint DII	A Plan and complete table below)					
	21 HA Consolua. (Check box if s	submitting a Joint Priz	, , , , , , , , , , , , , , , , , , ,					
	Participating PHAs		rogram(s) in the Consortia	Program(s) not in the Consortia	No. of Units in	Each Program		

B.	Plan Elements.				
B.1	Revision of Existing PHA Plan Elements. (a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission?				
	Y N ✓ □ Statement of Housing Needs and Strategy for Addressing Housing Needs. ✓ □ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. ✓ □ Financial Resources. ✓ □ Rent Determination. ✓ Homeownership Programs. ✓ Safety and Crime Prevention. ✓ Pet Policy. ✓ Substantial Deviation. ✓ Significant Amendment/Modification.				
	(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):				
	Statement of Housing Needs and Strategy for Addressing Housing Needs. Updated community vacancy rates and acknowledged the County's 2024 Point-in-Time count. Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. BHA's Admissions and Continued Occupancy Policy and Housing Choice Voucher Administrative Plan have been updated to comply with HUD's Housing Opportunities Through Modernization Act (HOTMA), revising eligibility, selection and admission policies and procedures. Financial Resources. Updated to reflect anticipated FY 2025 funding. Rent Determination. BHA's Admissions and Continued Occupancy Policy and Housing Choice Voucher Administrative Plan have been updated to comply with HUD's Housing Opportunities Through Modernization Act (HOTMA), revising rent determination policies and procedures as they relate to income and assets.				
	(c) The PHA must submit its Deconcentration Policy for Field Office review.				
	Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. BHA's Deconcentration Policy is attached.;				
B.2	New Activities. (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N Whope VI or Choice Neighborhoods Mixed Finance Modernization or Development. Demolition and/or Disposition. Conversion of Public Housing to Tenant Based Assistance. Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. Project Based Vouchers. Units with Approved Vacancies for Modernization. Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).				
	(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing developmen or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan				
	Mixed Finance Modernization or Development. BHA is in the process of purchasing two parcels for affordable housing development in 2028. BHA is also in pre-development on a redevelopment site and substantial rehabilitation of up to 9 former Low Income Housing properties. Demolition and/or Disposition. BHA is reviewing feasibility and is considering submitting applications for RAD, Section 18 and/or a RAD/Section 18 blend for BHA's remaining public housing units to include WA025000001, WA025456715 and WA041. The exact unit mix is not yet determined however the change will not represent a significant				
	amendment to the PHA Plan. Conversion of Public Housing to Tenant Based Assistance. BHA is reviewing feasibility and is considering submitting applications for RAD, Section 18 and/or a RAD/Section 18 blend for BWCHA's remaining public housing units to include WA025000001, WA025456715 and WA041. If BHA proceeds in this manner, it will convert public housing to PBV or PBRA assistance as required under the program.				
	Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. BHA is the assessing feasibility of a RAD and/or a RAD Section 18 blend portfolio conversion for its remaining Public Housing portfolio including WA025000001, WA02545615 and WA041. If feasible, BHA may submit RAD applications in 2025. The exact unit mix is not yet determined however the change will not represent a significant amendment to the PHA Plan. Project Based Vouchers. BHA intends to commit 8 project-based vouchers to the Opportunity Council's Bellis Fair project. BHA may project base up to 33 additional vouchers in				
	accordance with its Administrative Plan. Units with Approved Vacancies for Modernization. BHA anticipates modernizing up to 10 public housing units when they become vacant as the result of contamination, and/or need modernization. BHA's 3 senior/disabled high rises have waste and supply lines that are at risk of failure. BHA is working with HUD to identify potential resources including HUD's Capital Fund Financing Program, Operating Fund Financing Program and Emergency Capital Fund grants. To complete this work, residents will need to relocate at least temporarily. The scope of relocation will be determined once funding resources have been secured. Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). BHA will apply for additional Capital Fund resources such as Emergency Safety and Security Grants as applicable and as needed. BHA will apply for Emergency				

	Capital Fund grants, if eligible, and other applicable resources to complete the high-rise waste and supply line replacement project noted above.
В.3	Progress Report. Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. BHA's mission is to offer opportunities for people to thrive by ensuring access to quality, affordable homes. BHA's goals, objectives and progress is attached.
B.4	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. HUD-approved BHA's most recent 5-Year Action Plan on 5/24/2023.
B.5	Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y ✓ N ☐ (b) If yes, please describe: Finding: A federal award finding was issued in the FY 2022 Audit, to the Housing Choice Voucher program regarding HQS inspections that occurred, were noted as failed, but reinspection's were not performed timely. Specifically, 13 of 25 units noted as failed, did not have reinspection's as required within 30 days. Action Taken: In response to the global pandemic, HUD waived the completion of HQS inspections from April 2020 - December 2022. Following the lifting of the Federal State of Emergency, HUD discontinued the waiver and required public housing authorities not only resume regular HQS inspections but also complete every inspection that was not completed during the waiver period. This created a wave of inspections that historic inspection staffing levels could not keep up with. Furthermore, completing inspections continued to be a challenge with households missing inspections or need to reschedule due to COVID. BHA recognized this challenge and created an inspections department with two inspectors and a full-time admin support person to complete the backlog of inspections timely and to provide greater inspection support in the future. The authority has also reviewed scheduling and tracking practices, including automatically scheduling a reinspection following a fail, to ensure timely follow-up.
C.	Other Document and/or Certification Requirements.
C.1	Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) have comments to the PHA Plan? Y N N (b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. Comments received at the RAB meetings are attached.
C.2	Certification by State or Local Officials. Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.
С.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan? Y \bigcup N \bigcup If yes, include Challenged Elements.
D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	Affirmatively Furthering Fair Housing (AFFH). Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

Form identification: WA025-Housing Authority City of Bellingham Form HUD-50075-HP (Form ID - 798) printed by Kate Donnelly in HUD Secure Systems/Public Housing Portal at 07/10/2024 04:08PM EST

Goals, Objectives and Progress in Meeting the 5-Year Plan 2025

Goal 1: Expand the supply of assisted housing.

Measures

- Leverage private or other public funds to create additional housing opportunities.
- Search for new housing opportunities, including land for development and property acquisition, to increase affordable housing base.
- Monitor and update BHA's long-range preservation program for current affordable housing inventory.

Progress

- BHA applied for and was awarded 7 Housing Choice Vouchers, 5 VASH Vouchers and 2 FYI Vouchers, expanding voucher opportunities in our community.
- BHA applied to the Washington State Housing Finance Commission's Land Acquisition Program
 to secure two parcels of land, anticipating construction of two mixed-income buildings totaling
 100+ units, between 2028-2030.
- BHA is assessing the feasibility and timeline of redeveloping its former administrative office in downtown Bellingham.
- BHA successfully exited investors from 6 Low Income Housing Tax Credit properties that ended their initial 15-year compliance period. BHA is evaluating each property's needs and developing a comprehensive rehabilitation plan to ensure the longevity of these housing opportunities.
- BHA updates its 5-year development pipeline at least annually to ensure progress and that the plan reflects the changing needs of the community.
- BHA has developed a 10-year plan for rehabilitation of its Low-Income Housing Tax Credit portfolio.
- BHA updates it's 5-year capital plan for its public and affordable housing portfolio at least quarterly to prioritize capital needs.
- BHA is reviewing the feasibility of RAD and Section 18 for its remaining public housing units.
- BHA is actively searching for land and property to acquire for future affordable housing.

Goal 2: Improve the quality and living environment of assisted housing.

Measures

- Increase customer satisfaction.
- Renovate or modernize public housing units.
- Improve energy efficiency where possible.
- Hold resident meetings for the purpose of getting more resident involvement in the development of the agency annual plan and to discuss other prominent issues.
- Stay on schedule with Capital Fund Program improvements.
- Increase diversity within the Board of Commissioners and staff to best represent the community we serve.

Progress

- BHA completed or is in the process of completing the following projects to improve the quality and living environment of BHA's public housing:
 - o Replaced south facing windows at Chuckanut Square.
 - o Entered a contract to replace the roof at Lincoln Square.

- Added ductless mini-split systems to each high-rise community room, to provide a respite for residents when temperatures become excessive and to improve each building's climate resilience.
- Completed camera and secure access improvements at several properties.
- Collaborated with Amazon Key to provide secure package delivery at BHA's secure access facilities.
- Contracted with a security services provider to proactively patrol properties in our downtown core experiencing security concerns.
- Actively pursuing landscape design alternatives to create a climate resilient and efficient landscape plan. Additionally, this plan will include replacement of aging play structures at BHA's public housing properties.
- BHA reviews its capital improvement plan quarterly, updates schedules, and creates work plans to ensure full utilization of all available capital funds and all applicable deadlines are met.
- BHA holds annual meetings with residents for input on the PHA Plan, capital needs and other resident concerns.
- BHA works with public housing resident communities and public housing residents individually to improve communication and overall resident satisfaction.
- BHA has launched online portals, allowing greater access for applicants and participants to submit paperwork, submit work orders, review ledgers, and provide another avenue for reliable communication with authority staff.
- BHA has electronic information boards in its three high rise properties to improve communication with residents.

Goal 3: Identify opportunities and partnerships that increase affordable housing opportunities and associated services.

Measures

- Conduct outreach efforts to potential voucher landlords.
- Establish partnerships that increase affordable housing options and/or assist participants in successfully maintaining their affordable housing opportunity.

Progress

- BHA has engaged with an early learning provider to establish an early learning center at Samish Commons.
- As part of the development of Samish Commons Senior and participation in the Low-Income
 Housing Tax Credit program, BHA donated \$25,000 to YWCA on behalf of Samish Senior Housing
 LLLP, of which BHA serves as the managing member. The YWCA intends to use the donation on
 their recently acquired permanent supportive housing property.
- BHA entered a Housing Assistance Payment contract with the Opportunity Council for 6 project-based vouchers at their senior Low-Income Housing Tax Credit property called Laurel Forest.
- BHA has a Landlord Liaison program with one point of contact for landlord needs.
- BHA offers a Landlord Portal where landlords can access their account information, unit inspection results and contact BHA staff.
- BHA continued its many partnerships with community organizations to provide and maintain affordable housing opportunities and services.
- BHA continues to expand and seek new partnership opportunities to fully utilize available housing programs and expand housing opportunities in our community.

Goal 4: Ensure equal opportunity and affirmatively further fair housing.

Measures

- Comply with all Federal, State, and local nondiscrimination laws.
- Undertake affirmative measures to ensure access to assisted housing, a suitable living environment and accessible housing to persons with disabilities regardless of race, color, religion, national origin, sex, familial status, and disability.
- Provide equal opportunity and fair housing to applicants and residents.

Progress

- BHA fully complies with all Federal, State, and local nondiscrimination laws; the Americans With Disabilities Act; and the U.S. Department of Housing and Urban Development regulations governing Fair Housing and Equal Opportunity.
- BHA provides Federal/State/local information to applicants and participants regarding discrimination and any recourse available to them if they believe they may be victims of discrimination.
- BHA assists any family that believes they have suffered illegal discrimination by providing and assisting in the completion and submission of the housing discrimination form.
- BHA meets or exceeds 504 regulations.

Goal 5: Manage BHA's housing programs in an efficient and effective manner.

Measures

- Maintain a minimum Public Housing Assessment System (PHAS) score and Section 8
 Management Assessment Program (SEMAP) of Standard Performer.
- Increase customer access to programs and staff.
- Educate the public on the benefits of BHA programs.

Progress

- BHA's Public Housing program continues to be a high performer for PHAS and has an occupancy rate of at least 98%.
- BHA's Housing Choice Voucher program continues to be a high performer for SEMAP and has an occupancy rate and/or funding utilization of at least 96%.
- BHA offers applicant and participant portals to increase program access and staff efficiency.
- BHA participates regularly in a variety of venues to educate and provide information on available housing programs, how to access each program and advocates for the expansion of affordable housing programs.

Annual Plan Elements - Revision of PHA Plan Elements

Statement of Housing Needs and Strategy for Addressing Housing Needs.

Bellingham and the greater Whatcom County area continue to struggle with availability of affordable housing. The Whatcom County 2024 Annual Update on Homelessness counted 671 persons experiencing homelessness in 2024 compared to 1,012 in 2023. However, the update notes that the overall rate of homelessness remains relatively stable because new instances of homelessness are emerging as quickly as they can be resolved. A healthy rental vacancy rate is between 5-7%. Bellingham and Whatcom County's rental vacancy rates have increased to approximately 3% compared to 2% the past couple of years but the market remains highly competitive. Average rent prices have increased approximately 2.6% from a year prior and an estimated one third of all households in Whatcom County are cost-burdened, meaning they pay more than 30% or more of their income on housing costs.

In response, BHA works to maximize HCV lease up, minimize unit turnover time, and maintain 98% occupancy in its Public Housing and other affordable housing programs. BHA also recognizes the critical importance of partnering with community agencies to meet the needs of our seniors, disabled and individuals exiting homelessness. Funding for affordable housing development is highly competitive and insufficient to meet current needs. Construction costs also present challenges to developing additional affordable housing units. That said, BHA is actively pursuing development opportunities and community partnerships to increase affordable housing opportunities in Whatcom County.

> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.

The Admissions and Continued Occupancy and HCV Administrative Plan have been updated. List of revisions attached.

> Financial Resources.

Revenues will be used to support the administration, operation, physical maintenance and integrity of public housing and rental assistance programs. BHA intends to use Operating Subsidy for CFP activities as authorized under HOTMA.

The Housing Authority projects:

- Tenant Revenues \$2,415,000
- Federal operating subsidies \$1,340,000
- Capital Grant Funding \$1,400,000
- Section 8 Rental Assistance \$23,500,000

- Mixed Finance Modernization or Development.
 - Village at King Mountain
 - Unity Street
 - LIHTC WRAP Project
 - BHA is actively pursuing potential sites for new development of affordable housing.

Demolition and/or Disposition.

 BWCHA is reviewing feasibility and is considering submitting applications for RAD, Section 18 and/or a RAD/Section 18 blend for BWCHA's remaining public housing units to include WA025000001, WA025456715 and WA041. The exact unit mix is not yet determined however the change will not represent a significant amendment to the PHA Plan.

Conversion of Public Housing to Project-Based Assistance under RAD

 BWCHA is currently assessing feasibility of a RAD and/or a RAD Section 18 blend portfolio conversion for its remaining Public Housing portfolio including WA025000001, WA02545615 and WA041. If feasible, BWCHA may submit RAD applications in 2025. The exact unit mix is not yet determined however the change will not represent a significant amendment to the PHA Plan.

Project Based Vouchers.

- BHA executed a HAP with Laurel Forest Housing, LLC, for 6 project-based vouchers. This new construction project will consist of 56 one-bedroom apartments designated to serve low-income seniors. An additional 20% of the units will be designated for persons with disabilities, and 6 units for households exiting homelessness. Issuance of project-based vouchers is consistent with the City of Bellingham's Consolidated Plan in that it will provide much needed affordable housing units that will target low-income households.
- BHA intends to enter an AHAP with Bellis Fair Family Housing for 8 project-based vouchers. This new construction project will consist of two phases, the first with 62 units of one, two, and three bedroom units with rents set at 30% and 50% of the area median income. 20% of the units will be designated for persons with disabilities, and an additional 20% for households exiting homelessness.
 Construction completion and lease up are anticipated in January 2024.
- BHA may project base up to 33 additional vouchers in accordance with the Administrative Plan.

Units with Approved Vacancies for Modernization.

• BHA anticipates modernizing up to 10 public housing units when they become vacant as the result of contamination, and/or need modernization.

 BHA's 3 senior/disabled high rises have waste and supply lines that are at risk of imminent failure. BHA is working to identify potential resources including HUD's Capital Fund Financing Program, Operating Fund Financing Program and Emergency Capital Fund grants. To complete this work, residents will need to relocate at least temporarily. The scope of relocation will be determined once funding resources have been secured.

➤ Other Capital Grant Programs

- BHA may apply for additional Capital Fund resources such as Emergency Safety and Security Grants as applicable and as needed.
- BHA may apply for Emergency Capital Fund grants and other applicable resources to complete the high-rise waste and supply line replacement project noted above.

Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2]

The PHA's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of the PHA's deconcentration policies must be in included in its annual plan [24 CFR 903.7(b)].

The PHA's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

Steps for Implementation [24 CFR 903.2(c)(1)]

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, the PHA must comply with the following steps:

Step 1. The PHA must determine the average income of all families residing in all the PHA's covered developments. The PHA may use the median income, instead of average income, provided that the PHA includes a written explanation in its annual plan justifying the use of median income.

BWCHA Policy

The BWCHA will determine the average income of all families in all covered developments on an annual basis.

Step 2. The PHA must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, the PHA has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

BWCHA Policy

The BWCHA will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

Step 3. The PHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely-low income family (federal poverty level or 30 percent of median income, whichever number is higher).

Step 4. The PHA with covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.

Step 5. Where the income profile for a covered development is not explained or justified in the annual plan submission, the PHA must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances the PHA's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration
- Providing other strategies permitted by statute and determined by the PHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and PHA strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under the PHA's deconcentration policy. The PHA must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the PHA's deconcentration policy [24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, the PHA will be considered to be in compliance with the deconcentration requirement and no further action is required.

BWCHA Policy

For developments outside the EIR the BWCHA will take the following actions to provide for deconcentration of poverty and income mixing:

BWCHA may offer one or more incentives to encourage applicant families whose income classification would help to meet the income goals of a particular development.

Various incentives may be used at different times, or under different conditions, but will always be provided in a consistent and nondiscriminatory manner.

Depending on local circumstances BWCHA's deconcentration policy may include, but is not limited to the following:

Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments

Establishing a preference for admission of working families in developments below the EIR

Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration

Providing other strategies permitted by statute and determined by BWCHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and BWCHA strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under BWCHA's deconcentration policy. BWCHA must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under BWCHA's deconcentration policy [24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, BWCHA will be considered to be in compliance with the deconcentration requirement and no further action is required.

Order of Selection [24 CFR 960.206(e)]

The BWCHA system of preferences may select families either according to the date and time of application or by a random selection process.

BWCHA Policy

Families will be selected from the waiting list based on preference. Among applicants with the same preference, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the BWCHA.

When selecting applicants from the waiting list the BWCHA will match the characteristics of the available unit (unit size, accessibility features, unit type) to the applicants on the waiting lists. The BWCHA will offer the unit to the highest ranking applicant who qualifies for that unit size or type, or that requires the accessibility features.

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

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

Public Comment

FY 2025 Comments received from the public, residents, and Resident Advisory Board(s).

- 1. Request to install chains on Chuckanut Square lobby windows to prevent them from opening too wide and allowing people to gain access to the building.
 - Response: Staff will review potential options for securing the windows that are compliant with egress requirements.
- 2. Request for additional washers and dryers and an accessible washer and dryer at Chuckanut Square.
 - Response: Staff will review the current laundry room for additional capacity. Regardless, staff will inquire with the laundry company about getting accessible machines.
- 3. Request to install a fob entry on the lower-level dining room area to facilitate easier entry.
 - Response: Staff will review the location for potential addition of a card reader.
- 4. Request to install a second smoking shelter at Chuckanut Square in a different location on the property or to make the existing one larger and add an awning to prevent residents from getting wet.
 - Response: HUD requires smoke free housing and with limited financial resources, BHA will not enlarge or modify the current shelter.
- 5. Request to better utilize the existing bulletin boards in the Lincoln Square lobby, to include posting announcements and BHA paperwork.
 - Response: BHA posts announcements to the electronic reader board in the Lincoln Square community room. Additionally, pertinent documents are located on BHA's website, and are accessible from the computers in the computer lab. That said, the property manager will make an effort to also post important information on the bulletin boards as much as possible.
- 6. Request for exterior window cleaning at Lincoln Square.
 - Response: This is on BHA's radar. Unfortunately, it has been challenging to find window cleaning companies with the capacity to handle such a large job. BHA will continue to pursue this.
- 7. Request to increase cleaning in common areas (restrooms, lobby and hallway flooring more frequently at Lincoln Square.
 - Response: BHA will evaluate the current custodial schedule and add additional attention to these areas.
- 8. Request for an update on the roof replacement at Lincoln Square.
 - Response: Staff provided an updated timeline for completion of the roof replacement project.

9. Request for an update on new furniture in the Washington Square lobby.

Response: Staff are currently pricing furniture options and hope to complete this project before year end.

10. Request for additional washers and dryers and an accessible washer and dryer at Washington Square.

Response: Staff will review the current laundry room for additional capacity. Regardless, staff will inquire with the laundry company about getting accessible machines.

11. Request for information on the last time the Washington Square HVAC system was cleaned.

Response: Maintenance will gather the information and share with interested residents.

12. Request for the Washington Square Garden boxes to be repaired or replaced.

Response: Staff will inquire with the Lion's Club, who originally built the garden boxes, about the possibility of repairing them. If that is not an option, BHA will look for other opportunities to replace the boxes.

13. Request for sidewalk repair at Washington Square in front of the F Street door.

Response: BHA will evaluate the sidewalk and plan an appropriate repair.

14. Report that the dining room doors are not latching properly.

Response: Maintenance will review and repair the doors as necessary.