



City of Galveston

Grants & Housing Department

P.O. Box 779 / Galveston, TX 77553-0779
(409) 797-3820 / Fax (409) 291-4553 | www.galvestontx.gov

February 27, 2020

To: Brian Maxwell, City Manager
Hon. Mayor and City Council Members

From: Alice T. Law, Interim Director of Grants & Housing

RE: **Consider for Approval to Authorize the City Manager or his Designee to Execute a Certification of Consistency (HUD Form-50077-SL) with the City's Consolidated Plan for the Galveston Housing Authority.**

I. Background

- A. The Consolidated Plan is a multi-year strategic plan required by the U.S. Dept. of Housing & Urban Development (HUD). The Plan identifies an Entitlement Community's housing and non-housing community development needs and actions to address the priority goals within the Plan.
- B. HUD regulations require that an applicant agency or organization for HUD funds must provide a Certification of Consistency Form from each Entitlement Community or Jurisdiction in which a project will be located.

II. Current Situation

- A. The Galveston Housing Authority (GHA) has submitted their Annual and Five-Year Plans to the City to affirm that it is consistent with the City's Consolidated Plan.
- B. The City has reviewed the GHA Annual and Five-Year Plans and found that the proposed elements and activities of creating sustainable homeownership opportunities; educating potential homebuyers or renters; restoring and increasing the supply of assisted housing and promoting a path to self-sufficiency; improving the quality of assisted housing and fostering an improved living environment; promoting participant self-sufficiency and asset development; ensuring equal opportunity and affirmatively furthering fair housing; addressing blight and deconcentrating poverty; and staff development are consistent with the goals and objectives of the City of Galveston's Consolidated Plan. **(Attachment A)**



III. Issues

- A. Consistency: Galveston Housing Authority's proposed programs and activities are consistent with the identified needs and strategies and considered High Priorities in the City's Consolidated Plan.
- B. Budget is not an issue. There is no direct cost associated to the City for the GHA programs.
- C. Compliance with HUD requirements: If the City denies the request for a Certification of Consistency, it must provide specific reasons for the denial.

IV. Recommendation

- A. Authorize the City Manager or his Designee to execute a Certification of Consistency with the City's Consolidated Plan for the Galveston Housing Authority.

V. Fiscal Impact Report

Request by: Alice T. Law
Interim Director of Grants & Housing

Funding Source: N/A

Cost of implementation: N/A

Respectfully Submitted,



Alice T. Law
Interim Director of Grants & Housing

Approved,

Brian Maxwell
City Manager

ATTACHMENT A

**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 2/29/2016

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Alice T. Law, the Interim Director, Grants and Housing Dept.
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

Housing Authority of the City of Galveston
PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of
Impediments (AI) to Fair Housing Choice of the

City of Galveston, Texas
Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State Consolidated Plan and the AI.- GHA's Plan of proposed elements and activities of creating sustainable homeownership opportunities; educating potential homebuyers or renters; restoring and increasing the supply of assisted housing and promoting a path to self-sufficiency; improving the quality of assisted housing and fostering an improved living environment; promoting participant self- sufficiency and asset development; ensuring equal opportunity and affirmatively furthering fair housing; addressing blight and deconcentrating poverty; and staff development are consistent with the goals and objectives of the City's Consolidated Plan.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official
Alice T. Law

Title
Interim Director of Grants & Housing

Signature

Date

| | | |
|--|---|--|
| Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i> | U.S. Department of Housing and Urban Development Office of Public and Indian Housing | OMB No. 2577-0226 Expires: 02/29/2016 |
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. Form HUD-50075-ST is to be completed annually by **STANDARD PHAs** or **TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only 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 both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 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 exceeds 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.

| A. | PHA Information. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--------------------|---|-----------------------------|---------------------------------|------------------------------|-----|--------------------|----------|-----------------------------|---------------------------------|------------------------------|--|----|-----|-----------|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|
| A.1 | <p>PHA Name: Housing Authority of the City of Galveston, Texas PHA Code: TX-017 PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY) 07/2020 PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units 564 Number of Housing Choice Vouchers (HCVs) 1376 Total Combined Units/Vouchers 1940 **GHA also administers 243 DHAP-IKE vouchers PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. PHAs must have the elements listed below in sections B and C 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. 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.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> | | | | | Participating PHAs | PHA Code | Program(s) in the Consortia | Program(s) not in the Consortia | No. of Units in Each Program | | PH | HCV | Lead PHA: | | | | | | | | | | | | | | | | | |
| Participating PHAs | PHA Code | Program(s) in the Consortia | Program(s) not in the Consortia | No. of Units in Each Program | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | PH | HCV | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Lead PHA: | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| B. | Annual Plan Elements | | | | | |
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| B.1 | <p>Revision of PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p><u>Deconcentration Policy</u> GHA's de-concentration and income-mixing goal, in conjunction with the requirement to target at least 40 percent of new admissions to public housing in each fiscal year to extremely low income families, will be to admit higher income families to lower income developments, and lower income families to higher income developments. In the event that the target goal is not being met, GHA may skip families with higher preference or earlier date/time in order to reach a family of the extremely low income level.</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p> <p>See above (B.1 (b))</p> | | | | | |
| B.2 | <p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Project-Based Vouchers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants)</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development 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.</p> <p>Please see Attachment Titled "2 - TX017 - v HUD-50075-ST - GHA Annual Plan Elements B.2 New Activities FYB July 1, 2020"</p> | | | | | |

| | |
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| B.3 | <p>Civil Rights Certification.</p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>Please see Attachment Titled {TO BE ADDED}</p> |
| B.4 | <p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p> |
| B.5 | <p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p>Please see Attachment Titled "4 - TX017 - v HUD-50075-ST - GHA Annual Plan Elements B.5 - Progress Report on FYE June 30, 2019 - FYB July 1, 2020"</p> |
| B.6 | <p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(c) 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.</p> |
| B.7 | <p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>Please see Attachment Titled {TO BE ADDED}</p> |
| B.8 | <p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> |
| C. | <p>Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p> |
| C.1 | <p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>Capital Fund 5-Year Action Plan for 2019-2023, Submitted 05-03-2019; Approved by HUD 05-22-2019</p> |

**2 - TX017 - v HUD-50075-ST –
GHA Annual Plan Elements
B.2 New Activities**

FYB July 1, 2020

GHA plans to undertake new activities related to the following in the upcoming GHA Fiscal Year:

Mixed Finance Modernization or Development

GHA, with help from its developer MBS, will begin construction on two mixed finance projects consisting of replacement public housing units. This activity will begin in the current fiscal year and progress into the upcoming fiscal year.

Demolition and/or Disposition

GHA, will amend its HUD Special Applications Center submission for disposition of the former Oleander Homes site. This activity will begin in the current fiscal year and progress into the upcoming fiscal year. GHA may seek to dispose of property at 4700 Broadway (current site of Island Community Center) and demolish the current Community Center for redevelopment of replacement housing during GHA FYB July 1, 2020.

Designated Housing for Elderly and/or Disabled Families

Prior to Hurricane Ike in 2008, Holland House and Gulf Breeze were limited to elderly and disabled populations. These developments lost this designation following the storm because of the shortage of affordable housing available in Galveston. In the years since the hurricane, GHA has replaced 282 affordable housing units. GHA is currently working with its developer to replace the remaining units lost to Hurricane Ike. HUD granted the elderly and disabled designation for Holland House in 2017 after the completion of 184 units. Now that additional affordable units are available on the island, GHA will likely request approval to reinstate the elderly/disabled designation for Gulf Breeze in the upcoming fiscal year.

Units with Approved Vacancies for Modernization

GHA utilizes capital funds to conduct modernization activities at the current public housing sites at Gulf Breeze, Holland House, Oaks, and Scattered Sites.

**4 - TX017 - v HUD-50075-ST –
GHA Annual Plan Elements B.5 –
Progress Report on FYB July 1, 2019 - FYE June 30, 2020**

1. HUD Strategic Goal: Strengthen the Nation’s Housing Market

PHA Goal: Create financially sustainable homeownership opportunities

Objectives:

- Invested in partnerships: lenders, banks
- Provided educational opportunities for HCV participants to learn about Homeownership through the FSS program

PHA Goal: Protect and educate consumers when they buy, refinance, or rent a home

Objectives:

- Partnered with area banks for buyer education
- Conducted program orientations for both tenants and landlords routinely

2. HUD Strategic Goal: Meet the Need for Quality Affordable Housing

PHA Goal: Restore the supply of assisted housing in Galveston

Objectives:

- Worked with the Texas General Land Office and HUD to increase affordable housing options in Galveston

PHA Goal: Increase assisted housing choices

Objectives:

- Provided and maintained mobility counseling as a routine part of HCV briefings to make clients aware of choices in housing
- Completed PBV scattered sites component of redevelopment constructed by developers in conjunction with Texas General Land Office (97 PBVs)

3. HUD Strategic Goal: Utilize Housing as a Platform for Improving Quality of Life

PHA Goal: Improve the quality of assisted housing and foster an improved living environment

Objectives:

- AMP Managers attended resident council meetings and other social functions to interact with residents and/or discuss issues pertinent to their respective areas of responsibility
- Provided enhanced services to senior and disabled population through Computer centers
- Published senior newsletters on a monthly basis
- Conducted quarterly walkthrough on the properties by the Public Housing Managers and Maintenance Director
- Renovated/modernized public housing units
- Worked with community partners to inform and educate residents on a variety of services and opportunities
- Provided National Night Out activities promoting community involvement, safety and security (crime awareness)
- Continued and maintained public housing security improvements – expanded police presence, additional monitors, security cameras, ID badge system, contracted with security company for increased presence of security personnel
- Held monthly tenant meetings for education, information sharing, and to get input from residents
- Addressed Exigent Health and Safety Deficiencies of REAC inspections within 24-hour notice period

PHA Goal: Promote self-sufficiency and asset development of assisted households

Objectives:

- Continued partnerships with various social service programs
- Provided supportive services to increase independence for the elderly or families with disabilities
- Continued the Family Self-Sufficiency Program and conducted additional outreach for increased awareness of FSS program
- Continued HCV Homeownership Programs
- Partnered with supportive services to improve participants' employability, i.e. Texas WorkForce, and sought avenues with local educational institutions to expand opportunities to enhance residents' skills
- Partnered with Human Capital provider for supportive services to residents of the mixed income communities

4. HUD Strategic Goal: Build Inclusive and Sustainable Communities Free from Discrimination

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

Objectives:

- Undertook affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, disability, sexual orientation, gender identity, or marital status
- Ensured that the waiting list was free from discrimination based on the varying factors above
- GHA has certified that it has taken affirmative measures, including displaying a statement on the Home page of our website www.ghatx.org
- Conducted AFFH training for staff including Section 504
- Abided by GHA's policies and procedures when admitting persons to housing from the waiting lists, including admitting based on established preferences:
 - Former GHA Public Housing Families displaced as a result of a natural disaster
 - Preference for City of Galveston Residents
 - Disability Preference
 - Elderly Preference
 - Working Preference
 - Job Training/School Preference
 - Veterans' Preference

- Undertook affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, disability, sexual orientation, gender identity, or marital status
- Ensured that maintenance concerns were addressed properly in the order in which they were received and without bias based on the varying factors above
- Undertook affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required
- Ensured that persons with disabilities were accommodated where necessary and to the greatest extent feasible
- Continued to use mechanism for clients to notify GHA of need for reasonable accommodation

- Each employee signs a Code of Ethics Statement which includes an Equal Opportunity Non-Discrimination Statement at the time of the employee orientation

PHA Goal: Seek ways to address blight and deconcentrate poverty

Objectives:

- Continued to work with GHA's mixed income management partner to promote income mixing and deconcentrate poverty through GHA's redevelopment plans
- Worked with the Texas General Land Office and HUD to implement the plan to use scattered sites as part of the overall redevelopment plan

5. HUD Strategic Goal: Transform the way HUD does Business

PHA Goal: Prepare staff to perform the business functions of the agency more effectively

Objectives:

- Concentrated on efforts to improve specific management functions: (i.e. Quality Control; Public Housing finance; voucher unit inspections; work order turnaround)
- Provided department specific training where needed/beneficial
- Continued to require Housing Management Certification for all Asset Managers by the one year anniversary from date of hire
- Obtained Housing Quality Standards certification for HCV Inspectors
- Obtained HCV Certification for all Case Managers
- Continued to utilize process of intake and documentation for tenants and landlords to address concerns and complaints with the Agency
- Continued to use Standard Operating Procedure for HCV staff regarding return call policy to effectively track communication and improve customer service
- Stayed abreast of current technologies in order to build organization working capacity
- Web Based applications utilized in Public Housing and Housing Choice Voucher program where required
- Continued to respond to Open Records Requests in a timely fashion as required by law

- Continued use of website and social media to inform staff, residents, and the public
- Utilized online technology where possible with Landlords and Waitlist Applicants to streamline services
- Updated HCV forms to improve processes
- Maintained at least 98% reporting rate of PIC submissions
- Maintained just-in-time (real time) materials procurement to meet maintenance, to reduce storage costs
- Continued to utilize Standard Operating Procedures for payments from escrow accounts

**5-Year PHA Plan
(for All PHAs)**

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

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

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

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

| A. | PHA Information. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--------------------|--|--------------------|----------|-----------------------------|---------------------------------|------------------------------|---------------------------------|------------------------------|-----|-----------|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|
| A.1 | <p>PHA Name: <u>Housing Authority of the City of Galveston, Texas</u> PHA Code: <u>TX017</u></p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2020</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>Copies of GHA's 5-Year and Annual Plan are available in the GHA Main Office located at 4700 Broadway, Galveston, Texas, and at each GHA AMP (Holland House and Gulf Breeze). Additionally, the 5-year and Annual Plan will be available on GHA's website, ghatx.org .</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table> | Participating PHAs | PHA Code | Program(s) in the Consortia | Program(s) not in the Consortia | No. of Units in Each Program | | PH | HCV | Lead PHA: | | | | | | | | | | | | | | | | | | | | | | | |
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| | | PH | HCV | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Lead PHA: | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| B. | 5-Year Plan. Required for <u>all</u> PHAs completing this form. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|-------------------|--|
| <p>B.1</p> | <p>Mission. State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years.</p> <p>Vision: GHA uses its resources to create and strengthen inclusive, healthy and sustainable neighborhoods by providing high quality, affordable housing choices and by empowering low and moderate income families, the elderly, Veterans, victims of domestic violence, and the disabled in their journeys toward self-sufficient lives.</p> <p>Mission: GHA creates excellent housing options by fostering public/private partnerships with best in class real estate developers, property managers, and service providers to leverage public funds with private investment and empower individuals, families and communities by providing tools and opportunities to move in, up, and out.</p> |
| <p>B.2</p> | <p>Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years.</p> <p>See Attachment Labeled "TX 017 - v HUD 50075-5Y-B.2-Goals and Objectives"</p> |
| <p>B.3</p> | <p>Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.</p> <p>See Attachment Labeled "TX017- HUD v 50075-5Y-B.3-Progress In Meeting Goals and Objectives from Last Five Year Plan"</p> |
| <p>B.4</p> | <p>Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.</p> <p>See Attachment Labeled "TX017 - v HUD50075-5Y-B.4-Statement on VAWA from Administrative Plan"</p> |
| <p>B.5</p> | <p>Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.</p> <p>The Housing Authority of the City of Galveston, Texas (GHA) will use the following definition for "Substantial Deviation" and "Significant Amendment or Modification" to the Agency Plan:</p> <ol style="list-style-type: none"> 1. Changes to rent or lease or grievance procedures. 2. Any changes with regard to demolition activities <p>An exception to this definition will be made for any of the above that are adopted to reflect changes mandated by Congress or HUD regulatory requirements; such changes will not be considered significant amendments by HUD.</p> |
| <p>B.6</p> | <p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the 5-Year PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> |

B.7

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.

See Attachment {TO BE ADDED}

Galveston Housing Authority
TX017 – 50075-5Y
B.2 –Goals and Objectives

FYB July 1, 2020

1. HUD Strategic Goal: Strengthen the Nation’s Housing Market

PHA Goal: Create financially sustainable homeownership opportunities

Objectives:

- Invest in partnerships such as the City, the County, banks, lenders, and other service agencies
- Determine how homeownership can be a part of the overall development plans
- Collaborate with local entities and municipality to utilize any available funds for homeownership
- Utilize homeownership vouchers
- Create and maintain public facilities corporations and other affiliates/subsidiaries where needed to advance development initiatives
- Build a network of partnerships and resources to facilitate goals of homeownership program
- Explore creating homeownership opportunities that empower public housing and HCV clients toward self-sufficiency

PHA Goal: Protect and educate consumers when they buy, refinance, or rent a home

Objectives:

- Train HCV Staff to identify buyer ready participants for homeownership
- Develop a strategic plan for one-stop homeownership counseling/resource education
- Work with local partners on a resource assessment to determine what is required to encourage investment on the island
- Partner with area banks for buyer education
- Develop/update tenant informational packets where necessary to properly educate residents about rental/homeownership markets
- Continue Housing Choice Voucher educational endeavors
- Provide financial training and budget workshops to aid in credit repair

2. HUD Strategic Goal: Meet the Need for Quality Affordable Housing

PHA Goal: Restore the supply of assisted housing in Galveston in a way that encourages and promotes a path to self-sufficiency

Objectives:

- Apply for additional rental vouchers: If they become available during 2015 - 2019
- Build units or developments: GHA plans to redevelop 144 low income housing units damaged by Hurricane Ike via the mixed income initiative
- Use project based vouchers to restore the supply of affordable housing
- Encourage HCV Participants to enroll in the Family Self-Sufficiency (FSS) program which can help them eventually transition to Homeownership
- Continue to work closely with state low income housing advocates, the City of Galveston, HUD and Texas General Land Office to expedite the restoration of assisted housing damaged and destroyed by Hurricane Ike
- Collaborate with Housing Operations and low income housing advocates regarding a return policy for displaced public housing residents

PHA Goal: Increase assisted housing choices for target population

Objectives:

- Provide and maintain mobility counseling as a part of HCV briefings to make clients aware of choices in housing
- Conduct outreach efforts to potential voucher landlords
- Conduct outreach efforts through membership in Galveston County Apartment Association and Galveston Association of Realtors for HCV staff on a continuing basis
- Actively market the homeownership program and implement homeownership vouchers where possible
- Implement public housing site based waiting lists once redevelopment is completed (individual waiting lists for each site)
- Use project based vouchers to offer more assisted housing choices
- Utilize Low Income Housing Tax Credits (LIHTC)
- Complete modernization work two units at a time, decreasing the number of units offline at any given time

3. HUD Strategic Goal: Utilize Housing as a Platform for Improving Quality of Life

PHA Goal: Improve the quality of assisted housing and foster an improved living environment

Objectives:

- Implement a comprehensive Human Capital Plan for residents of housing developments and scattered sites, and participants in the HCV program, in conjunction with Human Capital partners
- Continually improve public housing management and achieve High Performer

(PHAS score)

- Continually improve voucher management and maintain High Performer (SEMAP score)
- Maintain excellent customer service
- Hold at least one board meeting per year at each open Public Housing site to better inform residents of GHA's ongoing business activities
- AMP Managers will attend three resident functions per year, including Resident Council meetings, or other social functions collectively, to interact with residents and/or discuss issues pertinent to their respective areas of responsibilities
- Produce quarterly agency newsletters
- Provide enhanced services to senior and disabled population through Computer centers and other services
- Publish senior newsletters on a monthly basis
- Continue resident Safety Awareness Classes
- Maintain relationships with MHMR and Adult Protective Services where needed
- Conduct at least four walkthroughs per year on the properties by the Public Housing Managers and Maintenance Director
- Work with local service providers to identify resources for victims of "Violence Against Women" (VAWA 2005) and train staff to identify needs and connect participants with resources
- Continue to renovate or modernize public housing units as funding permits
- Modernize units by making them energy efficient, using guidelines put forth in GNPS
- Maintain and update public housing security improvements as needed
- Update the Public Housing dwelling Lease and attachments
- Re-Designate developments or buildings for particular resident groups (elderly, persons with disabilities) once replacement housing is built
- Provide intensive support and training to residents to form and maintain functional Resident Councils to be the voice of the residents
- Conduct information community fairs and health fairs at housing developments

PHA Goal: Promote self-sufficiency and asset development of assisted households

Objectives:

- Increase the number and percentage of employed persons in assisted families through Section 3 initiatives
- Focus on decreasing "0" income reporting families
- Continue to provide and attract supportive services to improve assisted recipients' employability

- Maintain and create additional partnerships with local agencies, social services, and educational entities to expand opportunities to enhance resident educational skills during FY 2015-2019
- Continue to provide and attract supportive services to increase independence of the elderly or families with disabilities

- Continue the Family Self-Sufficiency Program for HCV participants, with the goal of increasing the number of families receiving escrow to 32 for FY2015
- Provide resident access to technology at each mixed income site
- Establish and maintain a relationship with Galveston neighborhood associations in which assisted housing is located so they have a direct connection with the Agency
- Manage cases and referral database for senior and disabled population
- Coordinate self-sufficiency activities for all residents
- Coordinate with Resident Councils to schedule recreational activities for all residents
- Conduct informational community fairs at Gulf Breeze and Holland House
- Complete non-profit applications for resident councils
- Create a volunteer program and procedures for volunteers
- Create a Resident Grievance Board
- Provide resident orientations upon move-in to assisted housing, including a resident handbook
- Enforce HUD's community service requirements for qualifying Public Housing residents

4. HUD Strategic Goal: Build Inclusive and Sustainable Communities Free from Discrimination

PHA Goal: Ensure equal opportunity and affirmatively further fair housing Objectives:

- Undertake affirmative measures to ensure access to and a suitable living environment for assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability
- Ensure that the waiting list is free from discrimination based on the varying factors above by utilizing preferences and policies established by the Board of Commissioners and approved by HUD
- Continue to ensure that maintenance concerns are addressed properly in the order in which they are received and without bias based on the varying factors above (barring emergency or life-threatening situation)
- Continue affirmative measures to ensure accessible housing to persons with all varieties of disabilities
- Continue to ensure that persons with disabilities are accommodated where necessary and to the greatest extent

feasible

- Continue to require that each employee signs the Code of Ethics which includes the Equal Opportunity Non-Discrimination Statement at the time of employee orientation
- Provide training to employees on Fair Housing and equal opportunity
- Utilize reasonable accommodation documentation created by staff using HUD guidelines
- Conduct a Fair Housing program during Fair Housing

Month (April) PHA Goal: Seek ways to address blight and deconcentrate poverty

Objectives:

- Continue utilizing the Designated Area Payment Standard to encourage families to move out of high poverty concentrated areas and move into low poverty communities and be exposed to opportunities within the community
- Continue redevelopment efforts in the City of Galveston which encourage strategic blight removal in areas related to the rebuilding of 144 Public Housing Units
- Continue to engage and partner with the City of Galveston to install, construct, or reconstruct streets, utilities, and site improvements essential to ongoing redevelopment efforts
- Continue to partner with the City of Galveston (via an inter-local agreement to share information) to identify non-HQS compliant landlords and move Agency clientele to affordable and safe housing that offers high opportunities for self-sufficiency

5. HUD Strategic Goal: Transform the way HUD does Business

PHA Goal: Prepare GHA staff and management to perform the business functions of the agency more effectively

Objectives:

- Concentrate on efforts to improve specific management functions:
 - Continue to address lease violations immediately and appropriately
 - Continue to provide education for residents and landlords on Housing Quality Standards and tenant and landlord responsibilities
 - Continue to strictly enforce the HCV property standards with the goal to raise HQS without limiting

housing choices

- Continue to provide department specific training where needed/beneficial
- Require Housing Management Certification for all Asset Managers and assistants by the one year anniversary from date of hire
- Require HCV Inspectors to maintain Advanced Housing Quality Standards certification
- Complete 100% HQS inspections
- Resolve jurisdictional matters
- Continue to maintain at least 97% reporting rate of PIC submissions during 2015 – 2019
- Maintain HCV utilization (by Available Budget Authority) 90% or better during FY 2015-2019
- Maintain just-in-time (real time) materials procurement to meet maintenance, to reduce storage costs
- Obtain UPCS certifications for all AMP Managers
- Continue to develop, implement and monitor training for each Program, (HCV, Public Housing) to ensure that our employees are thoroughly trained to be of service to our participants
- Continue to use and update Positive Performance Employee Evaluations to create a positive plan for professional development and training
- Create a program to recognize agency achievements, dedication and job performance, and promote teamwork
- Continue to update all GHA employee job descriptions to adequately fit current and required job duties
- Coordinate with Directors to create Standard Operating Procedures for each department to ensure consistency and assist in cross training
- Increase inter-departmental communication and collaboration to provide excellent service to residents and participants
- Continually update and train staff on Emergency Management Program
- Re-evaluate investment climate and seek competitive, approved opportunities to generate income for the Agency
- Utilize online technology where possible with Landlords to streamline services
- Achieve and maintain occupancy rate of 98% or better in Public Housing

- Provide customer service training for staff
- Provide communication training for staff
- Centralize procurement documentation in digital format
- Create a database of current contracts and expiration dates
- Implement monthly team-building activities for staff at public housing sites
- Improve on intake, documentation and follow up in resident services (with addition of staff if possible)
- Provide professional training for members of Resident Councils

Create a volunteer program for public housing sites

TX017 - v HUD-50075-5Y
B.3 – Progress In Meeting Goals and Objectives
Since Last Five-Year Plan (FYB July 1, 2015)

FYB July 1, 2020

1. HUD Strategic Goal: Strengthen the Nation’s Housing Market

PHA Goal: Create financially sustainable homeownership opportunities

Objectives:

- Invested in partnerships: lenders, banks
- Provided educational opportunities for HCV participants to learn about Homeownership through the FSS program

PHA Goal: Protect and educate consumers when they buy, refinance, or rent a home

Objectives:

- Partnered with area banks for buyer education
- Conducted program orientations for both tenants and landlords routinely

2. HUD Strategic Goal: Meet the Need for Quality Affordable Housing

PHA Goal: Restore the supply of assisted housing in Galveston

Objectives:

- Worked with the Texas General Land Office and HUD to increase affordable housing options in Galveston

PHA Goal: Increase assisted housing choices

Objectives:

- Provided and maintained mobility counseling as a routine part of HCV briefings to make clients aware of choices in housing
- Completed PBV scattered sites component of redevelopment constructed by developers in conjunction with Texas General Land Office (97 PBVs)

3. HUD Strategic Goal: Utilize Housing as a Platform for Improving Quality of Life

PHA Goal: Improve the quality of assisted housing and foster an improved living environment

Objectives:

- AMP Managers attended resident council meetings and other social functions to interact with residents and/or discuss issues pertinent to their respective areas of responsibility
- Provided enhanced services to senior and disabled population through Computer centers
- Published senior newsletters on a monthly basis
- Conducted quarterly walkthrough on the properties by the Public Housing Managers and Maintenance Director
- Renovated/modernized public housing units
- Worked with community partners to inform and educate residents on a variety of services and opportunities
- Provided National Night Out activities promoting community involvement, safety and security (crime awareness)
- Continued and maintained public housing security improvements – expanded police presence, additional monitors, security cameras, ID badge system, contracted with security company for increased presence of security personnel
- Held monthly tenant meetings for education, information sharing, and to get input from residents
- Addressed Exigent Health and Safety Deficiencies of REAC inspections within 24-hour notice period
- Obtained elderly/disabled designation for Holland House Apartments

PHA Goal: Promote self-sufficiency and asset development of assisted households

Objectives:

- Continued partnerships with various social service programs
- Provided supportive services to increase independence for the elderly or families with disabilities
- Continued the Family Self-Sufficiency Program and conducted additional outreach for increased awareness of FSS program
- Continued HCV Homeownership Programs
- Partnered with supportive services to improve participants' employability, i.e. Texas WorkForce, and sought avenues with local educational institutions to expand opportunities to enhance residents' skills
- Partnered with Human Capital provider for supportive services to residents of the mixed income communities

4. HUD Strategic Goal: Build Inclusive and Sustainable Communities Free from Discrimination

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

Objectives:

- Undertook affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, disability, sexual orientation, gender identity, or marital status
- Ensured that the waiting list was free from discrimination based on the varying factors above
- GHA has certified that it has taken affirmative measures, including displaying a statement on the Home page of our website www.ghatx.org
- Conducted AFFH training for staff including Section 504
- Conducted Fair Housing Workshop open to all Galveston citizens and officials in partnership with the City of Galveston during Fair Housing Month
- Abided by GHA's policies and procedures when admitting persons to housing from the waiting lists, including admitting based on established preferences:
 - Former GHA Public Housing Families displaced as a result of a natural disaster
 - Preference for City of Galveston Residents
 - Disability Preference
 - Elderly Preference
 - Working Preference
 - Job Training/School Preference
 - Veterans' Preference

- Undertook affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, disability, sexual orientation, gender identity, or marital status
- Ensured that maintenance concerns were addressed properly in the order in which they were received and without bias based on the varying factors above
- Undertook affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required
- Ensured that persons with disabilities were accommodated where necessary and to the greatest extent feasible
- Continued to use mechanism for clients to notify GHA of need for reasonable accommodation
- Each employee signs a Code of Ethics Statement which includes an Equal Opportunity Non-Discrimination Statement at the time of the employee orientation

PHA Goal: Seek ways to address blight and deconcentrate poverty

Objectives:

- Continued to work with GHA's mixed income management partner to promote income mixing and deconcentrate poverty through GHA's redevelopment plans
- Worked with the Texas General Land Office and HUD as they implemented the plan to use scattered sites as part of the overall redevelopment plan

5. HUD Strategic Goal: Transform the way HUD does Business

PHA Goal: Prepare staff to perform the business functions of the agency more effectively

Objectives:

- Concentrated on efforts to improve specific management functions: (i.e. Quality Control; Public Housing finance; voucher unit inspections; work order turnaround)
- Provided department specific training where needed/beneficial
- Continued to require Housing Management Certification for all Asset Managers by the one year anniversary from date of hire
- Obtained Housing Quality Standards certification for HCV Inspectors
- Obtained HCV Certification for all Case Managers
- Continued to utilize process of intake and documentation for tenants and landlords to address concerns and complaints with the Agency
- Continued to use Standard Operating Procedure for HCV staff regarding return call policy to effectively track communication and improve customer service
- Stayed abreast of current technologies in order to build organization working capacity
- Web Based applications utilized in Public Housing and Housing Choice Voucher program where required
- Continued to respond to Open Records Requests in a timely fashion as required by law
- Continued use of website and social media to inform staff, residents, and the public
- Utilized online technology where possible with Landlords and Waitlist Applicants to streamline services
- Updated HCV forms to improve processes
- Maintained at least 98% reporting rate of PIC submissions
- Maintained just-in-time (real time) materials procurement to meet maintenance, to reduce storage costs
- Continued to utilize Standard Operating Procedures for payments from escrow accounts

TX017 - v HUD50075-5Y-
B.4-Statement on VAWA from Administrative Plan

FYB July 1, 2020

3.10 Violence against Women Reauthorization Act Policy (VAWA)

Links: Violence Against Women Reauthorization Act 2005; 24 CFR 5.2005 (b), (d), (e); 24 CFR 5.2003; 24 CFR 5.2009; 24 CFR 5.2007 (a)(1)(v); Federal Register / Vol. 81, No. 221

This Policy is applicable to all federally subsidized housing administered by GHA. GHA will not discriminate against an applicant or resident on the basis of the rights or privileges provided under the VAWA. This policy is gender-neutral, and its protections are available to persons who are victims (including affiliated individuals) of domestic violence, dating violence, sexual assault or stalking.

The GHA will not deny admission to the housing choice voucher program to any person because that person is or has been a victim or affiliated individual of domestic violence, dating violence, sexual assault or stalking; provided that such person is otherwise qualified for such admission. In addition to prohibiting a denial, termination, or eviction based on the fact that the applicant or tenant/participant is or has been a victim of domestic violence, dating violence, sexual assault or stalking, GHA will not deny admission to an applicant 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.

3.10.1 VAWA - Notification of Rights

The GHA will enclose in each application packet a notice advising applicants of their rights under VAWA. The GHA will notify participants of their rights under VAWA during the annual re-certification process and with any adverse action notice along with a copy of the form HUD form 5380 (Notice of Occupancy Rights); HUD form 5382 (Certification of VAWA).

3.10.2 VAWA - Confidentiality

All VAWA information provided to the GHA, including the fact that an individual is a victim or affiliated individual of domestic violence, sexual assault, dating violence, sexual assault or stalking (VAWA violence); will be retained in confidence, and will not be entered into any shared database or provided to any related entity, except to the extent that disclosure is:

- Requested or consented to by the individual in writing
- Required for use in an eviction proceeding
- Otherwise required by applicable law

If disclosure is required for use in an eviction proceeding or is otherwise required by applicable law, GHA will inform the victim before disclosure occurs so that safety risks can be identified and addressed.

3.10.4 VAWA - Documentation

When a participant is facing lease termination because of the actions of a family member, household member, guest, or other person under the participant's control and a participant or immediate family member of the participant's family claims that she or he is the victim or affiliated individual of such actions and that the actions are related to VAWA violence, the GHA will request in writing that the individual submit documentation within fourteen (14) business days affirming that claim. The written request will include instructions on where, when, and to whom the documentation must be submitted. It will also state the consequences for failure to submit the documentation by the deadline. GHA may choose to extend the 14 day requirement to provide documentation or may choose to waive the requirement based on the circumstances surrounding the claim.

The individual may satisfy this request by providing any one of the following documents as described under 24 CFR 5.2007(b)(1):

- Form HUD-5382; or

- A document:
- Signed by an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional or a mental health professional (collectively, "professional") from whom the victim has sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse:
- Signed by the applicant or tenant; and
- That specifies, under penalty of perjury, that the professional believes in the occurrence of the incident of domestic violence, dating violence, sexual assault, or stalking that is the ground for protection and remedies under the VAWA Final Rule, and that the incident meets the applicable definition of domestic violence, dating violence, sexual assault, or stalking under 24 CFR 5.2003; or
- A record of a Federal, State, tribal, territorial or local law enforcement agency (may include a police report), court, or administrative agency; or
- At the discretion of GHA, a statement or other evidence provided by the applicant or tenant.

3.10.5 VAWA Lease Bifurcation

The GHA may request the owner to bifurcate a family's lease and terminate the tenancy of the culpable family member if the GHA determines that the family member has committed criminal acts of physical violence against other family members or others. This action will not affect the tenancy or program assistance of the remaining, non-culpable family members. In making its decision, the GHA will consider all credible evidence, including, but not limited to, a signed certification (form HUD-50066, HUD-5832) or other documentation of abuse submitted to the GHA by the victim.

If the GHA does bifurcate the lease and terminate the tenancy of the culpable family member, it will do so in accordance with the lease, applicable law, policies in this Administrative Plan and the GHA VAWA Procedure. If necessary, the GHA will also take steps to ensure that the remaining family members have a safe place to live during the termination process. For example, the GHA may refer the remaining family members to a victim service provider or other agency with shelter facilities.

3.10.6 Limitation On VAWA Protection

VAWA does not limit GHA's otherwise available authority to terminate assistance to or evict a victim for lease violations not premised on an act of domestic violence, dating violence, or stalking providing that GHA does not subject the victim to a more demanding standard than the standard to which it holds other tenants.

VAWA does not limit GHA's authority to terminate the tenancy of any tenant if GHA can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property if that tenant's tenancy is not terminated.

In determining whether a tenant who is a victim of domestic violence, dating violence, or stalking is an actual and imminent threat to other tenants or those employed at or providing service to a property, GHA will consider the following, and any other relevant, factors:

- Whether the threat is toward an employee or tenant other than the victim of domestic violence, dating violence, or stalking
- Whether the threat is a physical danger beyond a speculative threat, whether the threat is likely to happen within a short period of time
- Whether the threat to other tenants or employees can be eliminated in some other way, such as by helping the victim relocate to a confidential location, transferring the victim to another unit, or seeking a legal remedy to prevent the perpetrator from acting on the threat

If the participant wishes to contest GHA's determination that he or she is an actual and imminent threat to other tenants or employees, the participant may do so as part of the informal hearing or in a court proceeding.