

CITY OF DOUGLAS
HOUSING AUTHORITY



SECTION 8 HOUSING PROGRAM
2022

DRAFT ADMINISTRATIVE PLAN

REVISION ADOPTED **APRIL 13, 2022**

**CITY OF DOUGLAS HOUSING AUTHORITY
SECTION 8 ADMINISTRATIVE PLAN
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system of removing applicants' names from the waiting list will not violate the rights of persons with disabilities. If an applicant's failure to respond to a request for information or updates was caused by the applicant's disability, the Douglas Housing Authority will provide a reasonable accommodation. If the applicant indicates that they did not respond due to a disability, the Douglas Housing Authority will verify that there is in fact a disability and that the accommodation they are requesting is necessary based on the disability. An example of a reasonable accommodation would be to reinstate the applicant on the waiting list based on the date and time of the original application.

4.9 *INFORMAL REVIEW*

If the Douglas Housing Authority determines that an applicant does not meet the criteria for receiving Section 8 assistance, the Douglas Housing Authority will promptly provide the applicant with written notice of the determination. The notice must contain a brief statement of the reason(s) for the decision, and state that the applicant may request an informal review of the decision within ten (10) business days of the denial. The Douglas Housing Authority will describe how to obtain the informal review. The informal review process is described in **Section 16.2 15.2** of this Plan.

5.0 SELECTING FAMILIES FROM THE WAITING LIST

5.1 *SPECIAL ADMISSIONS {24 CFR 982.54(D)(E),982.203}*

If HUD awards a PHA program funding that is targeted for specifically named families, the PHA will admit these families under a Special Admission procedure.

Special admissions families will be admitted outside of the regular waiting list process. They do not have to qualify for any preferences, nor are they required to be on the program waiting list. The PHA maintains separate records of these admissions.

The following are examples of types of program funding that may be designated by HUD for families living in a specified unit:

- A family displaced because of demolition or disposition of a public or Indian housing project;
- A family residing in a multifamily rental housing project when HUD sells, forecloses or demolishes the project;
- For housing covered by the Low Income Housing Preservation and Resident Homeownership Act of 1990;
- A family residing in a project covered by a project-based Section 8 HAP contract at or near the end of the HAP contract term; and

- D. College or other school dormitories;
- E. Units on the grounds of penal, reformatory, medical, mental, and similar public or private institutions;
- F. A unit occupied by its owner. This restriction does not apply to cooperatives or to assistance on behalf of a manufactured home owner leasing a manufactured home space;
- G. Units owned by family members; and
- L. A unit receiving any duplicative Federal, State, or local housing subsidy. This does not prohibit renting a unit that has a reduced rent because of a tax credit.
- M. Manufactured/Mobile Homes constructed prior to June 15, 1976.

The Douglas Housing Authority *will not approve* a lease for any of the following special housing types, except as a reasonable accommodation for a family with disabilities:

- A. Congregate housing
- B. Group homes
- C. Shared housing
- D. Cooperative housing
- E. Single room occupancy housing
- F. Manufactured/Mobile home space rentals

The Douglas Housing Authority *will approve* leases for the following housing types:

- A. Single family dwellings
- B. Apartments
- C. Manufactured/Mobile housing - Post June 15, 1976
- D. ~~Manufactured/Mobile home space rentals~~

11.0 RENT AND HOUSING ASSISTANCE PAYMENT

11.1 GENERAL

After October 1, 1999, the Douglas Housing Authority will issue only vouchers to applicants, movers, and families entering the jurisdiction through portability.

11.2 RENT REASONABLENESS DETERMINATIONS [24 CFR 982.507]

The HCV regulations at 24 CFR 982.507 provide that the PHA may not approve a lease until the public housing authority (PHA) determines that the initial rent to owner is a reasonable rent. In order for the rent to be reasonable, the rent may not be more than rent charged by the owner for comparable unassisted units on the premises.

In order to assure that a fair rent is paid for units selected for participation in the Section 8 program and the Section 8 program does not have the effect of inflating rents in the community, the Douglas Housing Authority HQS inspector **position** will conduct rent reasonableness surveys, checklist and certifications for review by Housing Manager when units are placed under HAP for the first time and for review by Occupancy Specialist when owners request annual or special contract rent adjustment. Rent Reasonableness determination will be determined by The Douglas Housing Authority as described above in the following four instances:

- 1) Before entering into a HAP contract.
- 2) Before any increase in rent to owner.
- 3) If there is a five percent decrease in the published FMR (for the unit size rented by the family) in effect 60 days before the contract anniversary date as compared with FMR in effect one year before the contract anniversary date.
- 4) If directed by HUD.

The PHA may elect to re-determine rent reasonableness at any other time. At all times during the assisted tenancy, the rent to owner may not exceed the reasonable rent as most recently determined or re-determined by the PHA.

The owner will be advised that by accepting each monthly housing assistance payment, s/he will be certifying that the rent to owner is not more than rent charged by the owner for comparable unassisted units in the vicinity of the premises.

If requested, the owner must give the PHA information on rents charged by the owner for other units in the premises or elsewhere.

In determining that the rent to owner does not exceed the rents charged for comparable unassisted units on the premises, the PHA takes into consideration the rents for those units in the premises that are not assisted under a Federal, State, or local government program, as well as other comparable units in the immediate vicinity of the contract unit.

**SECTION 8
FAMILY SELF-SUFFICIENCY PROGRAM
ACTION PLAN**

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I. INTRODUCTION

The City of Douglas Public Housing Authority (PHA) administers the Housing Choice Voucher Program.

The goal of the City of Douglas's Family Self-Sufficiency Program (FSS) is to assist low and very low income families in becoming economically and socially self-sufficient. The minimum FSS Program size will be determined by United States Department of Housing and Urban Development (HUD). A service plan and FSS contract will be developed and maintained for each qualified participating family member.

This revised and updated FSS Action Plan is hereby made a part of the Douglas Housing Administrative Plan. This Action Plan describes how Douglas Housing Authority will administer the FSS Program.

II. FAMILY DEMOGRAPHICS

The required Family Self-Sufficiency Program size is 6 participants. The Quality Housing and Work Responsibility Act of 1998 allows the program size to decrease by one for each family that after October 1, 1999, fulfills their obligation under the FSS Contract of Participation. PHA will voluntarily increase the program size to 25 FSS participants. This will include the mandatory FSS program size and a voluntary FSS program. As the mandatory FSS program decreases the voluntary program size will increase. All FSS slots will be filled with current Section 8 Housing Choice Voucher participants who have volunteered for the program.

Following is a demographic profile of current Section 8 Housing Choice Voucher families. The Family Self-Sufficiency participants are predominately very low income, single, female head of household. Elderly, disabled, and handicapped populations are expected to be under-represented in the Family Self-Sufficiency Program, although participation will not be restricted on the basis of age or physical or mental ability.

CITY OF DOUGLAS SECTION 8 TENANT PROFILE	
Head of Household	
Male	25.73% 25.15%
Female	74.27% 74.85%
Couple (male or female headed)	11.7% 10.40%
Elderly, Disabled, Handicapped	77.2% 79.10%
Race/Ethnicity	
White	97.08% 95.71%
Black or African American	2.92% 4.29%
American Indian and Alaska Native	0.0%
Asian	0.0%

Native Hawaiian and Other Pacific Islander	0.0%
Two or More Races	0.0%
Hispanic or Latino	91.23% 88.96%
White, Not Hispanic or Latino	8.77% 11.04%
Declined to Report	0.0%
Income Limits	
Very Low Income Household	14.0% 17.80%
Extremely Low Income Household	78.9% 75.50%
Average Annual Adjusted Income	
0 Bedroom Families	\$10,264.25 \$10,363.75
1 Bedroom Families	\$10,375.58 \$10,764.53
2 Bedroom Families	\$12,584.08 \$12,665.86
3 Bedroom Families	\$17,631.20 \$20,265.61
4 Bedroom Families	\$30,949.00 \$24,662.00
5 Bedroom Families	\$0.00
Source of Income (Percentages equal more than 100% due to families having more than one source of income.)	
Asset Income	5.26% 9.20%
Child Support	1.75% 0.61%
AFDC	0.58% 1.23%
Pension	1.75% 1.23%
SSI	56.14% 55.21%
Social Security	49.71% 50.92%
Unemployment	2.34% 0.61%
Other Wage	16.37% 15.95%
No Income	0%
Non-wage income	13.45% 17.18%
General Assistance	84.80% 85.28%
Own business	0%

III. ESTIMATE OF PARTICIPATING FAMILIES

The City of Douglas's Family Self-Sufficiency Program will provide case management and supportive services to 25 or more participants in the Section 8 Housing Choice Voucher Program. An individual on the housing wait list will become eligible for the FSS Program once he/she has secured a lease under the Section 8 Housing Choice Voucher Program.

4. The family is removed from the Section 8 Housing Choice Voucher program for non-compliance of lease agreement or Section 8 policy and rule
5. The family continues to receive public assistance (welfare) at the end of the FSS contract term. (This does not include Medicaid, child care assistance, or housing subsidies.)

If the head of the FSS family ceases to reside with other family members in the Section 8 Housing Choice Voucher assisted unit, such as a result of divorce or death, the remaining members of the FSS family, in consultation with the Housing Agency, may designate another family member as head of household. The newly designated head of the FSS family may collect any escrow funds accrued in accordance with provisions outlined above.

C. HOMEOWNERSHIP OPPORTUNITIES

Family Self-Sufficiency participants who desire to purchase a home will have interim goals in their Individual Training and Service Plans that prepare them for homeownership. The City of Douglas plans to offer assistance and programs to help residents become home owners.

1. *Homeownership Education* - The City of Douglas's FSS Program will partner with **SEAGO and other** non-profit organizations to provide homeownership counseling and education on an ongoing basis. If a family wishes to purchase a home outside of the City of Douglas, they will be directed to a non-profit homeownership counseling group that is aware of the funding opportunities in that community.

VII. ACTIVITIES AND SUPPORTIVE SERVICES

The FSS specialist will provide supportive services necessary for participants to attain economic independence. The FSS specialist will maintain on-going personal and telephone contact with each participant to provide necessary emotional support, as well as assistance with problem solving, decision making, and barrier resolution.

The FSS specialist will remain knowledgeable of resources within the community and will assist participants in identifying and mobilizing needed services. The City of Douglas has developed partnerships with several local public and private entities in an effort to address family needs. Following is a list of anticipated service needs of FSS families and a sampling of collaborating agencies. Additional partnerships will be developed as needed to meet emerging needs.