

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 03/31/2024
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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, 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-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 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, 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.

A.	PHA Information.														
A.1	<p>PHA Name: <u>Jacksonville Housing Authority</u> PHA Code: <u>FL001</u></p> <p>PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/2024</u></p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>2329</u> Number of Housing Choice Vouchers (HCVs) <u>8637</u> Total Combined Units/Vouchers <u>10966</u></p> <p>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 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>How the public can access this PHA Plan: Hard copy will be available for review during regular business hours at the main administrative building.</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> </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						
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		PH	HCV												

<p>B.</p>	<p>Plan Elements.</p>
<p>B.1</p>	<p>Revision of Existing PHA Plan Elements. (a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <ul style="list-style-type: none"> <input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs <input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. <input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources. <input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination. <input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management. <input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures. <input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs. <input type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs. <input type="checkbox"/> <input type="checkbox"/> Safety and Crime Prevention. <input checked="" type="checkbox"/> <input type="checkbox"/> Pet Policy. <input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management. <input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation. <input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>Rent Determination. Admissions and Continued Occupancy Plan has been updated to reflect HOTMA changes in income, assets, rent calculations, and interim reexaminations.</p> <p>Pet Policy. Admissions and Continued Plan has been updated to reflect that dogs and cats must be restrained in a room not requiring access for unit entry by agency staff (e.g., maintenance requests) or that an adult household member must be present at the time of unit entry.</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p>
<p>B.2</p>	<p>New Activities. (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> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods. <input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development. <input type="checkbox"/> <input checked="" type="checkbox"/> Demolition and/or Disposition. <input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families. <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance. <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. <input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families. <input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers. <input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies. <input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers. <input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization. <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>(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>Hope VI or Choice Neighborhoods. The agency anticipates applying for Choice Neighborhood Planning Grant(s).</p> <p>Project-Based Vouchers. The agency will be issuing a Request for Proposal (RFP) to enter into additional Project-Based Voucher contract(s).</p> <p>Units with Approved Vacancies for Modernization. The agency anticipates requesting offline approval(s) to modernize vacant units.</p>
<p>B.3</p>	<p>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. Document uploaded.</p>
<p>B.4</p>	<p>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. 5-Year Action Plan was approved 10/21/2020.</p>

<p>B.5</p>	<p>Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y <input type="checkbox"/> N <input checked="" type="checkbox"/> (b) If yes, please describe: No findings to most recent audit.</p>
<p>C.</p>	<p>Other Document and/or Certification Requirements.</p>
<p>C.1</p>	<p>Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) have comments to the PHA Plan? Y <input checked="" type="checkbox"/> N <input type="checkbox"/> (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. Documentation attached.</p>
<p>C.2</p>	<p>Certification by State or Local Officials. <u>Form HUD 50077-SL</u>, <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>C.3</p>	<p>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, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>C.4</p>	<p>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 <input type="checkbox"/> N <input checked="" type="checkbox"/> If yes, include Challenged Elements.</p>
<p>C.5</p>	<p>Troubled PHA. (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input checked="" type="checkbox"/> (b) If yes, please describe:</p>
<p>D.</p>	<p>Affirmatively Furthering Fair Housing (AFFH).</p>
<p>D.1</p>	<p>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.</p>

Form identification: FL001-Jacksonville Housing Authority Form HUD-50075-ST (Form ID - 1068) printed by Todd Aubuchon in HUD Secure Systems/Public Housing Portal at 07/15/2024 02:29PM EST

Jacksonville Housing Authority Deconcentration Policy

This Deconcentration Policy complies with 24 CFR § 903.2 Subpart A

The Jacksonville Housing Authority (JHA) has established eligibility guidelines that will bring higher income tenants into lower income developments and lower income tenants into higher income developments. JHA will gather data and analyze, at least annually, tenant characteristics of its public housing stock, including information regarding tenant incomes, to assist in the deconcentration efforts.

The following measures have been utilized to achieve deconcentration of poverty in the public housing communities:

- The JHA has an established working preference based on a 2 to 1 formula.
- JHA has implemented a site-based waiting list for the Baldwin Apartment Community to promote deconcentration.
- JHA contracts with Lindsey Terrace Apartments a privately owned tax credit complex for 84 units for public housing individuals and families.
- JHA has purchased communities outside Jacksonville's Urban Core in its deconcentration efforts. Such as:
 - Anders, Forest East & West Apartments, 32216
 - Baldwin Apartments, 32234
 - Carrington Place, 32246
 - Colonial Village, 32210
 - Southwind Villas, 32216
 - Victory Pointe Apartments, 32205
- JHA purchased Gregory West Apartments, 162 units, an affordable community that is market rent located in the 32210 area.
- JHA has completed the new construction RAD PBV/LIHTC property The Waves, and has completed rehabilitation of Jacksonville Beach Redevelopment, Centennial Towers, and Hogan Creek. The agency continues to analyze the viability of conversions of other properties. Properties being considered include Oaks at Durkeeville, Carrington Place, Centennial Townhomes East / West, and Fairway Oaks.

Various incentives may be used at different times but will always be provided in a consistent and nondiscriminatory manner. The JHA will work towards deconcentration goals; however, if there are insufficient families on the waiting list or transfer list, under no circumstances will a unit remain vacant longer than necessary.

As of June 21, 2024			
Average income of all families in JHA developments			\$ 15,364.00
AMP	Average of Total Annual Income	Community Name	Above, Within, Below
FL001000010	12,872.00	Twin Towers	Below
FL001000012	17,820.00	Fairway Oaks	Over
FL001000013	13,833.00	Southwind Villas	Within
FL001000014	15,081.00	Victory Pointe	Within
FL001000015	16,045.00	Anders, Anders Scattered Sites, Forest East, and Forest West	Within
FL001000018	18,196.00	Centennial Townhouses East & West	Over
FL001000027	15,848.00	Scattered Sites	Within
FL001000032	15,739.00	Blodgett Villas	Within
FL001000036	16,928.00	The Oaks at Durkeeville	Within
FL001000045	13,210.00	Lindsey Terrace	Within
FL001000046	15,863.00	Colonial Village & Baldwin	Within
FL001000047	14,862.00	Riviera North and South	Within
FL001000048	13,580.00	Brentwood Park	Within
FL001000050	18,695.00	Carrington Place	Over
	85%	\$	13,059.00
	115%	\$	17,669.00

Jacksonville Housing (JH) continues to meet and exceed industry standards. The low-income public housing remains a HUD-designated high-performer. JH is proud to continue to serve families by providing safe, clean and affordable housing, and effective social services for residents in the Jacksonville Metropolitan area.

The HCV program continues to maintain a high lease up rate. The HCV program portfolio continues to grow and now includes Mainstream Vouchers, Family Unification Program, Family Unification Program—Youth.

Our Public Housing division continues to function effectively and efficiently as a successful property management company. Public Housing has maintained an overall vacancy rate of less than 1%, with an average of 99.5% occupancy. During Fiscal Year 2024 to date, maintenance completed an average of 3,423 work order requests per month, completing more than 30,800 through June 2024. The implementation of new software and mobile devices has allowed our team to streamline how we manage our assets and provide quality services to our residents in accordance with our Agency's strategic goals. With the implementation of our digital platform, our residents have the ability to conduct their business online by way of RENTCafé. Our customer service has been improved through continued employee trainings, workshops, and monthly resident community meetings which provide our residents opportunity to discuss community matters.

The success of the Resident Services Department is centered on providing direct case management, community outreach, supportive services, and economic incentives to increase self-sufficiency among our very low to moderate income families, so they can achieve economic stability, independence, and improve the quality of their lives. During FY2024, the resident services team directly assisted 2,630 JH families and seniors with direct services through service coordination, community resources, referrals, and employment opportunities. The FSS, ROSS, and Senior Services programs provide case management to approximately 1,200 residents annually, and approximately 30—50 FSS participants will graduate from our programs, securing permanent, gainful employment, homeownership, post-secondary education, and/or receive their accrued escrow to aid them on their path toward self-sufficiency. In addition, over 500 children will participate in summer camp, receive back-to-school supplies, and participate in the free lunch program at JH communities. At Victory Pointe and Southwind Villas, the HICKS Prep/Scholarship program engages our youth starting from 7th grade through college prep tutoring and SAT prep for students to receive fully paid scholarships to attend the University of North Florida. The Southwind JobsPlus program was launched in FY21 and has had a positive response from the community. Over 200 Southwind residents are in various stages of the JobsPlus program, either enrolled, completing the assessment, and/or have gained full-time employment or job training. Section 3 initiatives have been promoted by hosting vendor summits, sharing employment opportunities, and resident outreach. Additionally, the Neighborhood Network Center (NNC) at Brentwood provides GED instruction for approximately 50—100 adults annually (including testing, instruction, and exam prep), and offers Brentwood residents the opportunity to attend 1—2 job fairs annually at the community, with the chance to receive an employment offer immediately after the interview. Overall, JH Resident Services Department's goal is to provide self-sufficiency and wellness activities for approximately 3,000—5,000 families and seniors annually.

The Capital Fund Program continues to finance improvements and the modernization of our real estate portfolio owned by Jacksonville Housing. The Capital Fund Program is a Five-Year Plan, which was submitted and approved by HUD on 10/21/2020, and allows for modernization and required upgrades of major systems at the properties. This process is continuous and ongoing; during the last year, projects completed include new roof replacements on several properties, upgraded kitchens, plumbing projects, property signage, sidewalk repairs, drainage, paving, tree removal, unit modernizations, HVAC replacements, and elevator maintenance.

Capital Fund Program - Five-Year Action Plan

Status: Approved

Approval Date: 10/21/2020

Approved By: EPIC SYSTEM

Part I: Summary						
PHA Name : Jacksonville Housing Authority			Locality (City/County & State)			
PHA Number: FL001			<input type="checkbox"/> Original 5-Year Plan		<input checked="" type="checkbox"/> Revised 5-Year Plan (Revision No:)	
A.	Development Number and Name	Work Statement for Year 1 2020	Work Statement for Year 2 2021	Work Statement for Year 3 2022	Work Statement for Year 4 2023	Work Statement for Year 5 2024
	BLODGETT HOMES (FL001000032)	\$231,030.00	\$220,149.00	\$616,427.00	\$333,424.00	\$394,500.00
	BRENTWOOD LAKE (FL001000048)	\$725,816.00	\$324,677.00	\$423,677.00	\$402,114.00	\$707,060.00
	CARRINGTON PLACE APARTMENTS (FL001000050)	\$126,584.00	\$287,250.00	\$333,700.00	\$327,083.00	\$394,500.00
	CENTENNIAL TOWNHOUSE (FL001000018)	\$753,245.00	\$386,325.00	\$295,200.00	\$302,492.00	\$394,500.00
	COLONIAL VILLAGE (FL001000046)	\$99,124.00	\$326,805.00	\$350,805.00	\$309,821.00	\$394,500.00
	FAIRWAY OAKS (FL001000012)	\$275,799.00	\$290,335.00	\$364,835.00	\$327,437.00	\$394,500.00
	FOREST, ANDERS & SCATTERED SITES (FL001000015)	\$577,128.00	\$226,913.00	\$370,913.00	\$358,269.00	\$394,500.00
	OAKS AT DURKEEVILLE (FL001000036)	\$271,167.00	\$580,198.00	\$440,198.00	\$417,565.00	\$394,500.00
	RIVIERA APARTMENTS (FL001000047)	\$421,179.00	\$216,670.00	\$370,670.00	\$338,875.00	\$394,500.00
	SCATTERED SITES (FL001000027)	\$219,373.00	\$315,127.00	\$391,927.00	\$366,673.00	\$394,500.00

Capital Fund Program - Five-Year Action Plan

Status: Approved

Approval Date: 10/21/2020

Approved By: EPIC SYSTEM

Part I: Summary						
PHA Name : Jacksonville Housing Authority		Locality (City/County & State)				
PHA Number: FL001		<input type="checkbox"/> Original 5-Year Plan		<input checked="" type="checkbox"/> Revised 5-Year Plan (Revision No:)		
A.	Development Number and Name	Work Statement for Year 1 2020	Work Statement for Year 2 2021	Work Statement for Year 3 2022	Work Statement for Year 4 2023	Work Statement for Year 5 2024
	SOUTHWIND VILLAS (FL001000013)	\$891,681.00	\$703,155.00	\$406,461.00	\$296,663.00	\$394,500.00
	TWIN TOWERS (FL001000010)	\$1,061,998.00	\$1,438,067.00	\$899,595.00	\$1,512,101.00	\$586,500.00
	VICTORY POINT (FL001000014)	\$147,545.00	\$317,389.00	\$368,652.00	\$340,543.00	\$394,500.00

Name

A. Luchman, PhD

VANESSA DUNN

Molue Stewart

PATRICIA BARKCOM

FELICIA BROWNO

Cordeilia M. Parker

Sarah Wilson-Kraft

Signature

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Community or Organization

OCF

ACTING CEO

JACA

TWIN TOWERS / RAB

Twin Towers / RAB

JHA

RAB

FY2025 ACOP Changes w/ RAB & JALA
Meeting Notes
6/4/2024 1000

JHA: Vanessa Dunn, Cordelia Parker, Laila Darby, Todd Aubuchon

JALA: Mollie Stewart

RAB: Patricia Balkcom, Felecia Brown, Sarah Wilson-Craft

- VD all changes are HOTMA-related and mandatory; JH is implementing no discretionary policies
- VD summarizes HOTMA and history
- Section 102 – income reviews
 - Less interim reexams – 10% threshold for unearned income; no interims for increases in earned income
 - 9886 is now a one-time form
 - Can use income determinations from other programs
 - No requirement to review EIV at interims
 - Increase to \$525 for elderly/disabled
 - Additional income exclusions under 102
 - Increase in unreimbursed health and medical care expenses to 10% phased in over two years
 - Imputed income for assets increased to \$50k from \$5k
 - Hardship relief for expense deductions
 - No questions by JALA / RAB
- Section 103 – Income Limits
 - PH over-income families
 - No questions by JALA / RAB
- Section 104 – Assets
 - \$100k asset limit for admission to program
 - Suitable real property
 - Retirement and educational savings accounts are not included as net family assets.
 - Families can self-certify assets under \$50k
 - Deductions and asset limitations will be adjusted for inflation annually
 - No questions by JALA / RAB
- Other
 - EID terminated 12/31/23 for new enrollments
 - PHAs don't have to do periodic zero-income reviews, and may accept family self-certification of zero income as highest level of verification
- VD will be conducting evening resident meetings at properties to discuss changes during June




RAB question – discussion on housekeeping inspections. If resident puts in request for work order, can entrance to unit result in unannounced housekeeping inspection? VD says that staff can absolutely address any material deficiency identified during entry to unit, and should not “turn a blind eye to it.”

VD inquired if anyone had any additional questions. None. Adjourned at 1036



1300 Broad Street N
Jacksonville, FL 32202

Phone: 904-630-3810


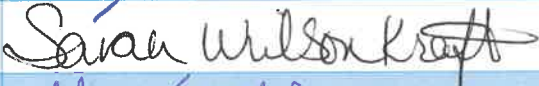



JaxHA.org   

July 1, 2024

RAB-JALA Jacksonville Housing Authority ACOP Public Comment Agenda

Meeting Facilitated by: Vanessa L. Dunn, MPA Acting CEO/President

Attendees:

Printed Name	Signature
Vanessa L. Dunn	
Sarah Wilson-Kraft	
Mary DeVries	
Todd Aubuchon	
Daniel Mitchell	
Cordelia Parker	

Objectives/Goals/Purpose

- A. Motivational Video
- B. ACOP Updates Discussion
- C. Questions/Comments/Concerns



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Jacksonville, FL 32202

Phone: 904-630-3810

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July 1, 2024

Ms. Mary DeVries
Jacksonville Area Legal Aid
126 W. Adams St.
Jacksonville, FL 32202

Re: JHA Resident Advisory Board Comments on Proposed Admission and Continued Occupancy Policy Amendments-Jacksonville Housing Authority Response

Dear Ms. DeVries:

Thank you for your comments and feedback regarding the proposed changes to the Jacksonville Housing Authority's Admission and Continued Occupancy Plan (ACOP). Your insight is invaluable and appreciated. Below, I have addressed the comments submitted in conjunction with the Resident Advisory Board (RAB) for the JHA.

Development of Annual Plan, Amendments, Modifications

The Jacksonville Housing Authority (JHA) values the relationship with RAB. It was not the intent of JHA to reduce the role of RAB during the process of modifying the governing plans for the agency. JHA experienced quite a bit of turmoil and leadership turnover during the time RAB would have been engaged to discuss the changes. As a result, and due to time constraints of mandatory policy changes implemented by the Department of Housing and Urban Development (HUD), JHA posted these mandatory changes during the public comment period.

JHA considers this an anomaly and does not anticipate a deviation from previous precedent to happen in the future.

Chapters 6 and 9-HOTMA Income Calculation Changes and Their Effect on Rent Calculations

The changes proposed do not impact the responsibilities of the residents. Residents must still report changes within ten (10) days of the occurrence in household composition, income and assets. During the annual and interim recertification process, JHA staff will continue to reiterate the importance of reporting changes timely to avoid repayments or possible lease termination. JHA is committed to reiterating this message at Community Engagement meetings held monthly at each site.



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Jacksonville, FL 32202

Phone: 904-630-3810

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Chapter 12-Single Offer for Transfer

JHA has internally struggled with whether to implement the policy change from 1-2 transfer offers. JHA has maintained a 99% occupancy rate across its public housing portfolio for the last four years. Additionally, the average length of time a resident remains in public housing is about 4.5 years. The spirit behind implementing this change is to reduce the wait time of families that have emergencies pertaining to the following categories:

1. VAWA
2. Medical
3. Health and Safety

*JHA RAB
request to broaden -
case-by-case basis -*

Upon review of the Transfer Waiting list, there were families awaiting a transfer for periods of time that could be expedited with a change in the policy. The example provided in your comment would be considered "good cause". JHA will include the definitions of good cause refusals.

Chapter 8-Inspection Notices

1. Inspection Notices should be Posted and Mailed

JHA is committed to ensuring residents are properly informed of upcoming inspections of their units. JHA will mail notices and when possible, staff will email this information as well to ensure all channels of communication have been utilized.

Maintenance staff will be reminded to leave the appropriate notices of entry whenever they enter a unit. Should residents find this process is not followed, they are strongly encouraged to inform the property manager and escalate their concern as necessary.

2. Pet Accompaniment During Repairs

JHA will review the concerns brought forth and address the questions raised.

3. NSPIRE Resident Feedback and Unit Recommendations

JHA is not notified of which units will be selected for inspection until the inspector arrives on the property the morning of the inspection. Unfortunately, RAB would not be involved in this process as JHA is not involved either.




*Jaha thinks
small % can be
selected by
Resident Counsel*

*TAM - NSPIRE
PHA/RAB have
voice in selecting
inspection units*



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While the NSPIRE report is a public document, JHA would not make this document available to all residents due to some of the findings from the inspector. This information can be sensitive. However, any resident that would like a copy of the report can request one through the public records request process.

Thank you for the opportunity to address your concerns and the ongoing partnership between JALA and RAB. Again, the insight provided allows JHA to ensure the decisions we are making have a positive impact whenever possible on the overall quality of life of the residents we serve.

Sincerely,

Vanessa L. Dunn, MPA
Acting CEO/President

C: Sarah Wilson-Kraft
JHA RAB President



JACKSONVILLE AREA Legal Aid

126 W. Adams Street
Jacksonville, FL 32202

Phone 904-356-8371
Fax 904-356-8285
www.jaxlegalaid.org

June 28, 2024

Ms. Vanessa Dunn, Acting President/CEO
Jacksonville Housing Authority
1300 N Broad Street
Jacksonville, FL 32202
Via email at: vdunn@jaxha.org

RE: JHA Resident Advisory Board Comments on Proposed Admission and Continued Occupancy Policy Amendments

Dear Ms. Dunn:

The JHA Resident Advisory Board (RAB) submits the following comments in response to the proposed amendments to JHA's Admissions and Continuing Occupancy Policy (ACOP).

Development of Annual Plan, Amendments, Modifications

RAB members were disappointed that unlike prior years, JHA did not timely consult with RAB members concerning the development of its "Annual Changes," consisting of substantial amendments to the JHA ACOP.

Traditionally, this consultation would take place several weeks before the changes were released to the public. This provided the RAB members with a reasonable opportunity to review the proposed changes and solicit input from the community members they represent. However, this year, RAB members were merely informed of the changes after they were released for public notice and comment. This process did not give enough time for RAB members to review the changes and solicit input.

Pursuant to 24 CFR §903.13, the "role of the Resident Advisory Board (or Resident Advisory Boards) is to assist and make recommendations regarding the development of the PHA plan, and any significant amendment or modification to the PHA plan."

To merely permit RAB members to comment on the proposed changes after they are released for public notice and comment improperly lessens the impact and input of RAB members. **RAB members respectfully request that JHA prioritize the RAB's future role in the Annual Plan process, through thoughtful and timely opportunities to assist and make recommendations.**

Chapters 6 and 9 – HOTMA Income Calculation Changes and Their Effect on Rent Calculations

While RAB members understand that JHA is making changes that affect calculation of income based upon the required implementation of HOTMA rules, RAB members are concerned that some of the changes will be a difficult adjustment for some residents.

Will JHA provide any resident education of the changes so that tenants are aware of their obligations, as well as how the changes may affect tenant rent portions?

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For example, all changes in income must still be reported within 10 days, but some changes may not trigger an interim adjustment of a resident's rent portion (See Section 9-III.C.). This may be confusing for residents. While RAB members acknowledge that the proposed changes to Section 9-III.C. include a requirement that JHA notify a resident if a reported change will not result in an interim rent portion change, we still see a need for resident education.

Chapter 12 – Single Offer for Transfer

JHA proposes to add a provision to the ACOP reducing the number of transfer offers made for both required and optional transfers to one (1) offer of transfer. This provision would be new to the ACOP. This issue was not addressed in the ACOP last year, but prior practice, as well as prior versions of the ACOP have required two (2) offers. Similarly, Section 21 of the lease requires that 2 transfer offers be made.

Given the vast size of Duval County, and the potential distance between JHA communities, **RAB recommends that JHA continue to require two (2) transfer offers.** For example, the distance between Carrington and Colonial Village is more than 30 miles. A required move of this distance would likely make it impossible for a resident to maintain their established community contacts (e.g., church).

RAB is aware that the ACOP provides that affected resident are entitled to reject a transfer offer for "good cause." Whether or not JHA decides to reduce transfer offers from 2 to 1, **RAB strongly recommends that JHA include in its transfer offer letters detailed information about good cause refusals (e.g., examples of good cause, process for invoking).** Of course, JHA must also provide notice of the tenant's right to dispute the transfer through the grievance process.

Chapter 8 – Inspection Notices

1. Inspection Notices Should be Posted and Mailed

RAB is aware that except for inspections, the Lease provides that all notices sent to residents must be either delivered personally or mailed (24 CFR §966.4(k)). With respect to inspections, said notices may be posted on the property. No other notices may be posted on the property.

RAB wants to bring to JHA's attention that for several reasons, posted notices do not always make it to the intended recipients. For some properties, management has provided door clips, but the clips often come off the door. Notices are also removed by the elements (wind and rain), as well as by children passing by.

Because of the importance of these inspections, **RAB members suggest JHA both mail and post notice of future NSPIRE inspections.** To the extent the notices are mailed, JHA must allow additional time for mailing.

RAB members would also like to bring to JHA's attention, that with respect to JHA entry into the unit when adult household members are absent, JHA staff does not always "leave a written statement specifying the date, time, and purpose of entry" as required by Section 17 of the Lease. **RAB requests that JHA act to ensure such entry notice is always given.**

2. Pet Accompaniment During Repairs

JHA has proposed the following:

Except for emergencies, management will not enter the dwelling unit to perform repairs where a pet resides unless accompanied for the entire duration of the repair by the pet owner or responsible person designated by the pet owner in accordance with the pet policies in Section 10-II.D.

RAB members request that JHA clarify/revise this provision. For example: How much notice of the entry for repair will

pet owners receive? How will notice be given? Are all, or just some, pets included? What if a resident can crate the pet? What if the resident can put the pet in a room that will not be entered to make a repair? If the resident may crate or put the pet in a room that will not be entered, how can the resident communicate that to JHA? How and when will the repair be rescheduled if necessary?

3. NSPIRE Resident Feedback and Unit Recommendations

Though not addressed in the ACOP changes, RAB members seek more information from JHA about the process for resident groups, like RAB, to assist in the identification of particular dwelling units they would like to add to the inspection process. Similarly, RAB members seek more information about the process JHA will use to ensure all residents receive a copy of the REAC inspection report.

We look forward to discussing the above recommendations with JHA as soon as possible given that the public hearing is already set for July 8th. We request a meeting at a mutually agreeable time prior to that date.

Sincerely,



Sarah Wilson-Kraft (Jun 28, 2024 14:15 EDT)

Sarah Wilson-Kraft
JHA RAB President



Mary DeVries
Jacksonville Area Legal Aid, Inc.







2024 RAB Comments JHA ACOP Changes

Final Audit Report

2024-06-28

Created:	2024-06-28
By:	E-Sign Requests (e-sign.requests@jaxlegalaid.org)
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1300 Broad Street N
Jacksonville, FL 32202

Phone: 904-630-3810

JaxHA.org   

July 9, 2024

Ms. Mary DeVries
Jacksonville Area Legal Aid
126 W. Adams St.
Jacksonville, FL 32202

Re: Follow Up to Public Comment Meeting on July 1, 2024

Dear Ms. DeVries:

Thank you for your participation and feedback in the development of the FY2025 Admissions and Continued Occupancy Policy (ACOP) for the Jacksonville Housing Authority.

As stated in the meeting, JHA is committed to updating the Transfer Request Forms to include the definition for good cause refusal of a unit. This definition is in the current ACOP, but as discussed will be included in the body of the form and subsequent letters approving or denying the request.

Again, thank you for bringing the matter regarding NSPIRE Resident Feedback and Unit Recommendations to our attention. Upon additional research, this initiative has not yet gone live. HUD has not provided any additional guidance to PHAs regarding an effective date of the implementation for this initiative. I have reached out to our local Field Office as well as REAC Technical Assistance for any additional information that can be provided. However, JHA is committed to ensuring our policies and procedures are updated to ensure the Resident Councils are actively involved in the process of unit selection for the purposes of NSPIRE.

Lastly, the concerns regarding the Pet Policy requesting residents to be present during repairs. The animal that attacked the maintenance mechanic was crated and was able to escape. JHA is concerned about the safety of employees as they attempt to respond to requests from our residents to ensure the unit remains in compliance.

JHA will require dogs and cats to be secured in a room that does not need to be entered to complete the necessary work. However, in the case of efficiency units, or where entry to all rooms may be necessary, the owner will be required to be present. The resident would initiate the rescheduling of the repair if they cannot be present, and JHA would work to reschedule the repair at a time convenient to the resident's schedule.

Again, thank you for your valuable partnership.

Kind Regards,

Vanessa L. Dunn, MPA Acting President and CEO

**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 3/31/2024

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

I, Donna Deegan, the Mayor of the City of Jacksonville, Florida, certify that the Annual PHA Plan for fiscal year 2023 of the Jacksonville Housing Authority is consistent with the Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair Housing Choice or Assessment of Fair Housing (AFH) as applicable to the City of Jacksonville, Florida, pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7(o)(3) and 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State Consolidated Plan.

The Jacksonville Housing Authority (JHA) has maintained consistency with the City of Jacksonville Consolidated Plan and has achieved the goals outlined below. JHA is a leader in the housing industry and has maintained its HUD designation as a High Performer in the low income public housing program. JHA retains its Accredited Management Organization (AMO) designation from the Institute of Real Estate Management, and is one of only five Public Housing Authorities nationwide to have achieved this designation. The Consolidated Plan identified major needs of Public Housing: maintenance for aging public housing dwellings, the acquisition of additional affordable housing, the expansion of accessibility for persons with physical and developmental disabilities, and the continuation and expansion of programs targeted to helping our residents achieve self-sufficiency and improve their living conditions. JHA currently serves over 12,000 households, including single individuals, families, elderly, disabled, and special needs. In recent years, JHA has purchased two multifamily communities and thirty-three single-family units to increase the number of affordable housing units. This added 387 affordable units available for low to moderate income families. JHA also provides employment opportunities for low-income households through the Section 3 program, while its Resident Services Department provides opportunities through Neighborhood Network Programs and other grants to assist residents with computer classes, educational opportunities, job fairs, financial planning workshops, and homeownership opportunities. Resident Services partners with HABIJAX in the annual Hicks Scholarship Program, which provides a full four-year college scholarship for tuition at the local University of Northeast Florida campus. JHA continues to work with community partners to promote and encourage success for the population and community JHA services. JHA will continue to strive to maintain and work in unison with the COJ 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: <i>Karen Bowling</i>	Title:
Karen Bowling	<i>Chief Administrative Officer</i>
Signature: <i>Karen Bowling</i>	Date: <i>5/16/2024</i>

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Karen Bowling
Chief Administrative Officer
For: Mayor Donna Deegan
Under Authority Of:
Executive Order No: 2023-02

Certification of Compliance with PHA Plan and Related Regulations
(Standard, Troubled, HCV-Only, and High Performer PHAs)

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 3/31/2024

PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year and/or Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 10/2024, in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair

housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.

8. For PHA Plans that include a policy for site-based waiting lists:

- The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);
- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
- Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
- The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
- The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).

9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.

10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.

11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.

12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.

16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.

18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.

19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.

- 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
- 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
- 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Jacksonville Housing Authority

FL001

PHA Name

PHA Number/HA Code

Annual PHA Plan for Fiscal Year **2024**

5-Year PHA Plan for Fiscal Years 20__ - 20__

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 Executive Director MS Vanessa Dunn		Name Board Chairman Mrs. Heather Horovitz	
Signature	Date	Signature	Date

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