



AGENDA

FOR THE REGULAR MEETING OF THE
LOS ANGELES COUNTY HOUSING ADVISORY COMMITTEE
WEDNESDAY, MARCH 15, 2023, 12:00 PM

LACDA HEADQUARTERS
700 WEST MAIN STREET
ALHAMBRA, CA 91801

To join via phone, dial **(747) 200-6781**, then enter **525 710 562#** when prompted.
[Click here to join the meeting](#)

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1. **Call to Order**

2. **Roll Call**

Pamela Williams, Chair
James Brooks, Vice Chair
Mary Canoy
Renee Contreras
Zella Knight
Kelli Lloyd
Connor Lock
Elda Mendez-Lemus
Ruthie Myers
Takao Suzuki
Anna Swett

3. **Reading and Approval of the Minutes of the Previous Meeting**

Regular Meeting of January 18, 2023

4. **Report of the Executive Director**



Administrative Office
700 West Main Street, Alhambra, CA 91801
Tel: (626) 262-4511 TDD: (626) 943-3898

Executive Director: Emilio Salas

Commissioners: Hilda L. Solis, Holly J. Mitchell, Lindsey P. Horvath, Janice Hahn, Kathryn Barger



5. **Presentations**

Annual Plan

6. **Public Comments**

Regular Agenda

7. **Approve the Annual Plan for the Los Angeles County Development Authority (All Districts)**

Recommend that the Board of Commissioners:

Find that approval of the Annual Plan is not subject to the provisions of the California Environmental Quality Act (CEQA), because it will not have the potential for causing a significant effect on the environment.

Approve the attached Annual Plan, as required by the U.S. Department of Housing and Urban Development (HUD), to update the LACDA's program goals, major policies and financial resources, including the Capital Fund Program (CFP) Annual Statement information, the Admissions and Continued Occupancy Policy for the Public Housing Program (ACOP), and the Housing Choice Voucher (HCV) Administrative Plan.

Adopt and instruct the Chair to sign the attached Resolution approving the Annual Plan for submission to HUD and authorize the Executive Director or his designee to take all actions required for implementation of the Annual Plan.

Authorize the Executive Director or his designee to execute all documents required to receive HUD allocated CFP funds which are estimated to be approximately \$8,900,000.

Authorize the Executive Director or his designee to incorporate into the Annual Plan all public comments received and approved for inclusion by the Board; and authorize the Executive Director or his designee to submit the Annual Plan to HUD by April 17, 2023.

8. **Commissioner Comments or Suggestions for Future Agenda Items**

Access to the agenda and supporting documents are available on the LACDA website. Agendas in Braille are available upon request. American Sign Language (ASL) interpreters, or reasonable modifications to Housing Advisory Committee meeting policies and/or procedures, to assist members of the disabled community who would like to request a disability-related accommodation in addressing the Commission, are available if requested at least four business days prior to the meeting. Later requests will be accommodated to the extent possible. Please

contact the Executive Office of the LACDA by phone at (626) 586-1855 from 8:00 a.m. to 6:00 p.m., Monday through Thursday, or by e-mail at nick.teske@lacda.org.

**MINUTES FOR THE REGULAR MEETING OF THE
LOS ANGELES COUNTY DEVELOPMENT AUTHORITY
HOUSING ADVISORY COMMITTEE**

Wednesday, January 18, 2023

The meeting was convened at LACDA headquarters, located at 700 West Main Street in Alhambra, California.

Digest of the meeting. The Minutes are being reported seriatim.

The meeting was called to order by Commissioner Williams at 12:08 p.m.

<u>Roll Call</u>	<u>Present</u>	<u>Absent</u>
Pamela Williams	X	
James Brooks	X	
Mary Canoy	X	
Renee Contreras	X	
Zella Knight	X	
Kelli Lloyd	X	
Connor Lock	X	
Elda Mendez-Lemus	X	
Ruthie Myers	X	
Takao Suzuki		X
Anna Swett	X	

Agenda Item No. 3 – Reading and Approval of the Minutes of the Previous Meeting

On motion by Commissioner Knight, seconded by Commissioner Brooks, the minutes of the Regular Meeting of December 21, 2022 were approved as presented.

Agenda Item No. 4 – Report of the Executive Director

Chief of Programs Tracie Mann welcomed all attendees and wished everyone a happy new year. She reported that Congress finalized a budget that includes significant funding for HUD housing and homelessness programs. The final spending bill, signed by President Biden on December 29, 2022, provides HUD programs with \$61.8 billion, or \$8.1 billion more than Federal Fiscal Year 2022-enacted levels. The final bill provides approximately \$754 million more than the amount proposed in the Senate draft, but nearly \$1 billion less than the amount provided in the House proposal.

Tracie reported that California Governor Newsom was set to unveil his budget proposal for the upcoming Fiscal Year, one that will have to account for a projected \$24 billion deficit, testing the State's commitment to expanding social safety net programs. Legislative leaders are projecting optimism about California's ability to weather any revenue shortfalls, pointing to the tens of billions of dollars that now sit in reserves. But if

the economic picture grows gloomier in the months ahead, lawmakers may be forced to downsize their boldest policy ideas. The Governor's proposal will set in motion months of negotiations with State lawmakers, who must pass a balanced budget by the constitutional deadline of June 15.

Assembly Speaker Anthony Rendon recently said housing issues would remain a central focus for the Legislature this session, including accountability for the billions of the dollars that California has spent on homelessness and development programs in recent years. Further, as it contends with the country's highest homelessness rate, this year the State will get its first glimpse of the impacts of new laws that aim to speed up affordable housing development in former commercial areas. Local governments faced a January 31, 2023 deadline to submit blueprints requiring the State to plan for 2.5 million homes by 2030, which the State is enforcing more seriously than it has in the past.

Tracie reported that on January 10, 2023, the Board of Supervisors proclaimed a local Emergency for Homelessness in LA County. The proclamation will provide the County with additional tools to accelerate and expand its response through the Homeless Initiative and in collaboration with city partners. The additional tools include accelerated hiring of employees, more effective and efficient use of funds, expedited procurement of critical items, faster and more streamlined creation of housing, expanded services, and the ability to request additional resources from the state and federal governments. The Chief Executive Office-Homeless Initiative is designated as coordinating body for efforts to expand and enhance services for people experiencing homelessness or at risk of becoming homeless, which encompasses the convening of several workgroups. The LACDA is participating in the Contracting and Procurement, Housing, and Spending workgroups.

Tracie reported that on January 9, 2023, the County's Anti-Racism, Diversity and Inclusion (ARDI) department held a Black People Experiencing Homeless Action Kick-off to advance racial equity in homelessness and housing. Tracie also reported on a meeting with the Do Goodery, a consulting firm hired by ARDI focusing on the First Time Homebuyers Assistance program, Housing Resource Center, Special Needs Housing and related programs.

Tracie reported that the LACDA received the official response from HUD that our request to transfer Emergency Housing Voucher (EHV) applicants to the HCV program was denied. HUD's reasoning was that they lack the authority for a statutory waiver to approve our request. We will have a follow up call with them, but in the interim, we are devising alternative means to address this quickly. The goal of the waiver request was to ensure housing resources for approximately 3,000 EHV voucher holders who otherwise face cancellation of their vouchers. With our current success rate of 45%, we realistically need to identify resources for approximately 1,350 households. Additionally, the LACDA is also closely monitoring the total amount of funds available for rental assistance under the EHV program, and we are coming close to exhausting those funds. HUD has made clear that they will not provide supplemental funding in the event we run out of funds before leasing every available voucher. We are also developing a contingency plan for that possibility.

Agenda Item No. 5 - Presentations

Family Self-Sufficiency Program Graduate
Public Housing Vacancies

Agenda Item No. 6 - Public Comments

Demetria Scott

Agenda Item No. 7 – Amendment to Increase Annual Compensation to Elevator Maintenance and Repair Services Contract

On motion by Commissioner Brooks, seconded by Commissioner Knight, the following was approved:

Recommend that the Board of Commissioners:

Find that approval of an Amendment to the existing Contract is not subject to the provisions of the California Environmental Quality Act (CEQA) because the services will not have the potential for causing a significant effect on the environment.

Authorize the Executive Director, or designee, to increase the annual compensation by \$100,000 with Next Level Elevator, Inc. for a total Contract amount of \$300,000, using program funds included in the LACDA's approved Fiscal Year 2022-2023 budget and to be included in the Fiscal Year 2023-2024 annual budget approval process, and to execute an amendment to the Contract, following approval as to form by County Counsel.

Agenda Item No. 8 –Contract for SB 721 Balcony and Deck Inspection Services

On motion by Commissioner Brooks, seconded by Commissioner Canoy, with Commissioner Knight abstaining, the following was approved:

Recommend that the Board of Commissioners:

Find that the approval of the SB 721 Balcony and Deck Inspection Services Contract is exempt from CEQA.

Authorize the Executive Director or his designee to execute a three-year Contract with Pacific InterWest for SB 721 Balcony and Deck Inspection Services for various LACDA public and affordable housing developments, for a not-to-exceed Contract amount of \$550,000, using Capital Fund Program (CFP) funds allocated by the U.S. Department of Housing and Urban Development (HUD) and included in the LACDA's approved Fiscal Year 2022-2023 budget.

Authorize the Executive Director or his designee to amend the Contract to extend the term for a maximum of two additional years at no additional cost.

Authorize the Executive Director or his designee to amend the Contract to increase the original Contract amount by up to \$55,000 (10% of the Contract amount) for any unforeseen services associated with the Contract, using the same source of funds.

Agenda Item No. 9 – Commissioner Comments or Suggestions for Future Agenda Items

Commissioner Knight requested a future presentation on the Section 8 Management Assessment Program (SEMAP). She also requested notification for Commissioners about upcoming events at public housing sites, and she recommended making resident activities more visible on the LACDA's website.

Commissioner Brooks requested contact information for fellow Commissioners as well as information or training on parliamentary procedures.

Commissioner Williams requested information about the Libertana organization that provides resident services at South Bay Gardens.

The meeting was adjourned at 1:34 p.m.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Emilio Salas", written over a horizontal line.

EMILIO SALAS
Executive Director
Secretary-Treasurer



March 15, 2023

TO: Housing Advisory Committee

FROM: Aletheia Broom, Director
Housing Assistance Division

RE: **FSS PROGRAM UPDATE – FEBRUARY 2023**

The Family Self-Sufficiency (FSS) Program is a HUD initiative intended to assist Housing Choice Voucher and Public Housing participants achieve economic independence and self-sufficiency.

ACTIVITIES

NUMBER CURRENTLY ENROLLED	293	As of March 1, 2023 , there were 257 Housing Choice Voucher (HCV) and 36 Public Housing (PH) FSS participants.
NEW ENROLLMENTS	3	(3) Housing Choice Voucher (HCV) and (0) for Public Housing (PH).
CONTRACTS EXPIRED	3	(2) FSS contracts expired for Housing Choice Voucher (HCV) and (1) for Public Housing (PH).
DIRECT ASSISTANCE REFERRALS	758 300 213 150 153 120 110 57 35 0 0 0	Job Referrals Work Source/Job Fairs Educational/Vocational/Job Training Financial Literacy Credit Repair Free Tax Prep Pop-up Sites Computer Training Home Ownership Counseling IDA Small Business Youth Services Other/Utility/Legal Aid/Covid-19/Child Care Services
OUTREACH & COMMUNITY EVENT	3	FSS overview during Voucher Issuance, Credit and Money Management Education Workshop, Lunch & Learn
GRADUATIONS	3	(3) Request for Graduation for Housing Choice Voucher (HCV) and (0) for Public Housing (PH).

If you have any questions, please feel free to contact me at (626) 586-1670.

Attachment



March 15, 2023

Housing Advisory Committee
Los Angeles County Development Authority
700 West Main Street
Alhambra, California 91801

Dear Commissioners:

**APPROVE THE ANNUAL PLAN FOR THE LOS ANGELES COUNTY
DEVELOPMENT AUTHORITY
(ALL DISTRICTS)**

SUBJECT

This letter recommends approval of the Los Angeles County Development Authority's (LACDA) Annual Plan for Fiscal Year 2023-2024 (Annual Plan). The Annual Plan updates the LACDA's program goals, major policies, and financial resources. Submission of the Annual Plan is required by the U.S. Department of Housing and Urban Development for receipt of Capital Fund Program funds, operating funds for the Public Housing Program, and administrative fees for the Housing Choice Voucher (HCV) Program.

IT IS RECOMMENDED THAT THE COMMITTEE:

1. Recommend that the Board of Commissioners find that approval of the Annual Plan is not subject to the provisions of the California Environmental Quality Act (CEQA), because it will not have the potential for causing a significant effect on the environment.
2. Recommend that the Board of Commissioners approve the attached Annual Plan, as required by the U.S. Department of Housing and Urban Development (HUD), to update the LACDA's program goals, major policies and financial resources, including the Capital Fund Program (CFP) Annual Statement information, the Admissions and Continued Occupancy Policy for the Public Housing Program (ACOP), and the HCV Administrative Plan.



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Executive Director: Emilio Salas
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3. Recommend that the Board of Commissioners adopt and instruct the Chair to sign the attached Resolution approving the Annual Plan for submission to HUD and authorize the Executive Director or his designee to take all actions required for implementation of the Annual Plan.
4. Recommend that the Board of Commissioners authorize the Executive Director or his designee to execute all documents required to receive HUD allocated CFP funds which are estimated to be approximately \$8,900,000.
5. Recommend that the Board of Commissioners authorize the Executive Director or his designee to incorporate into the Annual Plan all public comments received and approved for inclusion by the Board; and authorize the Executive Director or his designee to submit the Annual Plan to HUD by April 17, 2023.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

On October 21, 1998, the Quality Housing and Work Responsibility Act (QHWRA) mandated Public Housing Agencies to submit an Annual Plan every year and a Five Year Plan every five years to HUD.

The Five-Year Plan is a strategic planning document that identifies the LACDA's goals for the next five years. On June 23, 2020, the Board approved the current Five-Year Plan for Fiscal Years 2020-2024.

The Annual Plan identifies major program policies and financial resources. It updates information on housing needs, waiting lists, housing strategies, program policy changes and other program and management data. The Annual Plan must be updated each year and was last approved by the Board on April 5, 2022.

FISCAL IMPACT/FINANCING

There is no impact on the County general fund. Upon approval of the Annual Plan, the LACDA will receive approximately \$8,900,000, in CFP funds from HUD for management improvements, administrative costs and housing rehabilitation for the Public Housing Program. Operating funds for the Public Housing Program and administrative fees for the HCV Program will be approved through the annual budget process.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

Included as part of the Annual Plan are the updated CFP Annual Statement, ACOP, and the HCV Program Administrative Plan. Significant changes to these documents are discussed below.

Capital Fund Annual Statement

The Fiscal Year 2023-2024 Capital Fund Annual Statement summarizes the LACDA's plan to use modernization funds for management improvements, administrative costs and to rehabilitate 2,018 housing units at 21 Public Housing Program developments. Included are proposed work items, estimated costs, and an implementation schedule for the work to be completed.

As authorized by HUD, the Executive Director may amend the CFP Annual Statement as necessary to respond to needs such as housing emergencies, to safeguard property or protect health and safety, or to implement other changes that are in the interests of the LACDA and Public Housing residents. The Executive Director may also implement changes to the CFP Annual Statement in response to changes in federal funding.

Admissions and Continued Occupancy Policy for the Public Housing Program

The purpose of the ACOP for the Public Housing Program is to set guidelines to determine eligibility for admission and continued occupancy. The revised Public Housing ACOP reflects the following changes:

1. Unit Transfers

Currently, residents must return the keys to their old unit within five (5) calendar days of the date the transfer offer was made.

Effective July 1, 2023, residents must return the keys to their old unit within five (5) calendar days of the date of the execution of the new lease/keys provided for the new unit. This will provide a more reasonable timeframe for residents to move and return keys to their old unit following the acceptance of a unit transfer.

2. Conducting Annual Re-examinations Online

Currently, as of July 1, 2022, the LACDA requires that families conduct their annual re-examination online via the LACDA's online portal, referred to as the Yardi Rent Café Portal (or online Tenant Portal). A one-year transition period was approved following the implementation of this policy.

Effective July 1, 2023, the LACDA will provide families the opportunity to conduct annual re-examinations via the online Tenant Portal or submit a paper packet by the designated due date.

3. Guaranteed Income Program Exclusion

Currently, HUD does not allow for the exclusion of income from Guaranteed Basic Income Programs. Guaranteed Basic Income Programs traditionally provide temporary, unconditional, individual, and regular cash payments intended to support the basic needs of the recipients.

Effective July 1, 2023, subject to HUD approval, the LACDA will exclude income from Guaranteed Basic Income Programs, such as the Los Angeles County's "BREATHE" pilot program, which provides temporary monthly supplemental income that supports financial stability for participating households. The LACDA submitted a HUD waiver request on June 22, 2022.

4. Notification to the U.S. Postal Service (USPS) Regarding Evicted Individuals

Currently, following eviction for drug-related criminal activity, the LACDA's policy is to notify the USPS that mail should no longer be delivered to the person who was evicted.

Effective July 1, 2023, the LACDA will remove this policy language to avoid any perception that the LACDA is taking action to withhold mail. In accordance with USPS Code, a USPS Hold Mail request may only be submitted by anyone at an eligible address, or someone authorized by the customer to act on their behalf. Staff will instead write "No Longer at This Address" or "Return to Sender" on each piece of mail for all former residents and return to the postal carrier or local Post Office.

5. Banning Former Residents

Currently, the LACDA may ban a non-resident, including, but not limited to, a guest or visitor of a resident, for twelve (12) consecutive months if they commit two or more specified criminal acts in or upon any area of an LACDA housing development within a twelve (12) month period. Criminal acts include committing a felony, misdemeanor or infraction involving possession of a controlled substance under State or federal law, including without limitation, illegal drug activity or violent criminal activity.

Effective July 1, 2023, the LACDA will add "former residents" to the policy. Adding this language will allow the LACDA to ban former residents that previously engaged in the specified criminal acts prior to move out or eviction from returning to any of the LACDA's Public Housing developments. This change also holds current residents accountable and aligns with the Public Housing Lease which delineates, "That upon receiving written notice of a banned individual from Management, Resident and/or household members shall not permit a banned individual on Housing Development premises and Residence."

6. Temporary Relocation Policy

Currently, the Public Housing program does not have a detailed temporary relocation policy.

Effective July 1, 2023, the LACDA will add the following temporary relocation policy:

Temporary relocation is defined when a resident is relocated for a period no longer than twelve (12) months because their unit will undergo a capital improvement project. In general, temporarily relocated residents must be reimbursed for their reasonable out-of-pocket expenses related to the temporary move (i.e., increased housing costs, pet lodging, and moving expenses).

NOTE: In the event a resident is displaced for more than twelve (12) months, HUD requires that a residential resident be offered permanent displacement assistance.

Projects that Require Temporary Relocation:

- Require packing, moving, or storing residents' furniture or personal items.
- Involve the unit kitchen or bathroom where the work prevents use of these areas (relocation will be determined on a case-by-case basis).
- Resident can request relocation due to odors, dust, debris, noise, or other hazards (relocation will be determined on a case-by-case basis).

Examples: Termite Tenting, Emergency Repairs (flood, large roof leaks).

Projects that Do Not Require Temporary Relocation:

- Short-term temporary switch over to new equipment/fixtures, HVAC or A/C equipment, receptacles, or equipment, if the electrical, gas and water service to a unit is not interrupted for more than 24 hours.
- If ingress and egress can be safely maintained throughout construction (examples: Window & Slider Replacements, Solar Projects, Non-Emergency Roof Replacement/Repairs).

Temporary Relocation Options:

- A moderately priced hotel in the same community within 15 miles of the Housing Development (mileage can vary depending on hotel availability).
- A friend or family member's residence.
- A comparable replacement unit on-site (owners are encouraged to "stage" rehabilitation work so that residents can be relocated within the project), OR
- A comparable replacement housing off-site. This unit must be functionally equivalent to the unit being renovated. It should be in the same community as the Housing Development to minimize such impacts as: school transfers on the

residents and their children, access to transportation networks, proximity to employment, etc.

NOTE: Due to limited availability, comparable replacement units are reserved for residents who request and are approved for such units via a reasonable accommodation.

7. Non-Discrimination Policy Section

Currently, it is the policy of the LACDA to comply fully with all federal, State, and local nondiscrimination laws and with rules and regulations governing Fair Housing and Equal Opportunity in housing and employment.

Effective July 1, 2023, a single non-discrimination section will be added to Chapter 1: Statement of Policies and Objectives, as follows:

It is the policy of the LACDA to comply with the Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 et seq., by ensuring that housing is available to all persons without regard to race, color, religion, national origin, disability, familial status (having children under age 18), or sex. This policy means that, among other things, LACDA and its agents or employees must not discriminate in any aspect of housing, including but not limited to denying persons access to housing, because of race, color, religion, national origin, disability, familial status, or sex. Such agents and employees may not:

- a.** Make unavailable or deny a dwelling to any person because of race, color, religion, national origin, disability, familial status, or sex;
- b.** Discriminate against any person in the terms, conditions, or privileges of a dwelling, or in the provision of services or facilities in connection therewith, because of race, color, religion, national origin, disability, familial status, or sex;
- c.** Make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to a dwelling that indicates any preference, limitation, or discrimination based on race, color, religion, national origin, disability, familial status, or sex, or an intention to make any such preference, limitation, or discrimination; or
- d.** Coerce, intimidate, threaten, or interfere with any person in the exercise or enjoyment of, or on account of his or her having exercised or enjoyed, or on account of his or her having aided or encouraged any other person in the exercise or enjoyment of, any right granted or protected by the Fair Housing Act. Any agent or employee who fails to comply with this non-discrimination policy will be subject to appropriate disciplinary action.

Any action taken by an agent or employee that results in the unequal treatment of citizens on the basis of race, color, religion, national origin, disability, familial status, or sex, may constitute a violation of state and federal fair housing laws. An individual who believes that he or she is the victim of discrimination may contact the U.S. Department of Housing and Urban Development at 1-800-669-9777, or the U.S. Department of Justice at 1-202-353-1555.

8. Over Income Limit Households

Currently, the Public Housing Program will terminate the family's tenancy within six months if a household has an income that is over 120 percent of the Area Median Income (AMI) for the most recent two consecutive years, according to the Housing Opportunity Through Modernization Act (HOTMA) July 29, 2016. This rule excluded families receiving Earned Income Disregard (EID) and families participating in the Family Self-Sufficiency (FSS) Program.

Per the HOTMA final rule published on February 14, 2023, the over income limit rule now also applies to families receiving EID and families participating in the FSS Program. This section of the rule is effective March 16, 2023.

Housing Choice Voucher (Section 8) Program Administrative Plan

The purpose of the HCV (Section 8) Program Administrative Plan is to set forth the policies and procedures that govern the LACDA's administration of its rental assistance programs. The revised Administrative Plan reflects the following changes:

1. HCV (Section 8) Emergency Housing Voucher (EHV) Super One-Time Limited Preference

Currently, under its HCV (Section 8) Program's waiting list local preferences, the LACDA's highest priority is granted to families terminated due to insufficient funding followed by its second priority, which is its commitment of expected annual voucher attrition to assist Los Angeles County-based homeless families.

Now, the LACDA will implement, as its highest weighted priority, an EHV Super One-Time Limited Preference. Under this preference, the LACDA will grant up to 750 vouchers for families and individuals referred through the Continuum of Care (CoC) Coordinated Entry System (CES) that were found eligible under the LACDA's EHV program. To qualify for local preference eligibility, families and individuals must be holding an active EHV and must have not secured housing under an EHV-funded Housing Assistance Payment Contract for the first time.

Individuals and families will be required to meet all HCV program eligibility requirements and will be granted portability rights. Admission will be on a first-come, first-served basis and will be subject to voucher availability.

On May 12, 2021, the LACDA accepted 1,964 EHV's as part of an allocation of 70,000 vouchers issued to PHAs nationwide by HUD. The EHV's were allocated as a part of the American Rescue Plan Act, intending to assist individuals and families most in need and for whom providing rental assistance will prevent the family's homelessness or having a high risk of housing instability. The LACDA was successful in utilizing its entire allocation of EHV's but has now found that a limited number of families and individuals, who are currently unsheltered and have yet to secure housing, will continue to experience housing instability as a result of the LACDA's maximized allocation. This local preference will ensure families and individuals are offered the opportunity to participate in the HCV Program, with the goal of securing housing.

As such, this policy also supports the Los Angeles County Proclamation of a Local Emergency for Homelessness motion set forth by the Board of Supervisors on January 10, 2023. This policy will be implemented upon Board approval.

2. Reinstating the LACDA's 100 Percent Commitment to Homelessness

Currently, under its HCV waiting list local preferences, the LACDA commits 50 percent of its expected annual voucher attrition to assist Los Angeles County-based homeless families.

In response to the Los Angeles County Proclamation of a Local Emergency for Homelessness motion set forth by the Board of Supervisors on January 10, 2023, the LACDA will now increase its commitment from 50 percent to 100 percent of its expected annual voucher attrition. This policy will be implemented upon Board approval.

3. Local Preferences and Priorities

Under HUD regulations, the LACDA is permitted to establish HCV Program local admission preferences and to give priority to serving families that meet those criteria.

As of July 1, 2023, the LACDA's Administrative Plan (section 4.4 Local Preferences) will include the following changes:

- A statement has been added for transparency to inform the public that any local preferences established by the LACDA must be consistent with the Public Housing Agency plan and the Consolidated Plan and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

- Currently, the first local preference listed is for families previously assisted by the LACDA whose assistance was terminated due to insufficient funding. Since terminating families under insufficient funding is not a local need, but rather an administrative action under consultation with HUD and the Board, the LACDA will now relocate this language to the narrative above the local preference list affirming that LACDA will first assist families terminated under an insufficient funding action before selecting families from the waiting list for assistance under its local preferences.
- Currently, under the second local preference, the LACDA commits 50 percent of expected annual voucher attrition to assist Los Angeles County-based homeless families. Of that percentage, up to 5 percent of referral applications may be received from an approved local service provider assisting homeless elderly families and up to 5 percent of referral applications may be received from an approved local service provider assisting homeless Transitional Aged Youth (TAY) that are enrolled in an institution of higher education. Now, the LACDA will remove both of the 5 percent carve outs for the subject populations under this local preference. The elderly will continue to be prioritized through the LACDA's currently listed sixth local preference. The transitional age youth will continue to be prioritized through recent Family Unification Program (FUP) and recently HUD awarded Foster Youth to Independence (FYI) vouchers. Lastly, the currently listed second local preference will now include the prioritization of families already on the waiting list who declare themselves homeless, but not referred by partner agencies. Selected families will be required to provide certification from a Continuum of Care (CoC) Coordinated Entry System (CES) and/or partner agencies under contract or Memorandum of Understanding with the LACDA. The number of families who can qualify for this preference will be limited to a number as annually determined by the LACDA.
- As of July 1, 2023 the LACDA will now commit up to 50 vouchers for victims of human trafficking referred via a partner agency under contract or Memorandum of Understanding with LACDA. This local preference will be listed as the third highest priority.
- Currently, under the third local preference, the LACDA prioritizes rental assistance transfers for youth that are currently served in the FUP. Now, the LACDA will include an eligibility requirement for youth to be eligible for consideration. To be eligible, the youth must have been found eligible or exempted statutorily and have exhausted the 24-month extension. This change is being made to incentivize the youth to benefit from the 24-month extension under their current FUP/FYI Program.
- Currently, the fourth local preference prioritizes families who live or work in the jurisdiction in certain categories, such as referrals from law enforcement

agencies. Now, the LACDA will no longer prioritize referrals from law enforcement agencies since there is no longer a local need.

4. Family Unification Program, Foster Youth, Statutory Housing Limitation Extension of up to 12 Months

The Family Unification Program vouchers (as well as Foster Youth to Independence vouchers) used by youth are time limited, by statute, to 36 months of housing assistance. On January 24, 2022, HUD published a notice in the Federal Register implementing and providing guidance on the provisions of the Fostering Stable Housing Opportunities (FSHO), which made statutory change to the 2021 Appropriations Act to increase the amount of time that youth may receive a FUP voucher. Under FSHO, former foster youth will be able to receive up to an additional 24 months of voucher assistance, for a maximum of 60-months if certain requirements are met.

Effective July 1, 2023, the LACDA's Administrative Plan will now include policies that permit FUP youth who first leased or leases a unit after the date of the enactment of the 2021 Appropriations Act (i.e., December 27, 2020) to qualify for an additional 24-month extension. The extension of assistance will be made available to youth participating in a Family Self-Sufficiency (FSS) Program. If the youth is unable or unwilling to enroll in the FSS Program, the youth may receive an extension of assistance if they engaged in education, workforce, or employment activities for at least 9-months out of the 12-months preceding the extension. As required by the statute, the policy will provide limited exceptions for youth whose personal circumstances make them unable to engage in such activities, such as:

- The FUP youth is a parent or is a household member responsible for the care of a dependent child under the age of 6 or the care of an incapacitated person;
- The FUP youth is a person who is regularly and actively participating in a drug addiction or alcohol treatment and rehabilitation program;
- The FUP youth is a person who is incapable of complying with the requirement to participate in the FSS program or engage in education, workforce development, or employment activities, as applicable, due to a documented medical condition.

5. Removal of the Moderate Rehabilitation Program and Enhanced Voucher Assistance Chapters

The Moderate Rehabilitation Program was designed in 1978 and provides project-based rental assistance for low-income families. The program was repealed in 1991 and no new projects were authorized for development. Assistance is limited to properties previously rehabilitated pursuant to a housing assistance payments (HAP) contract between an owner and a Public Housing Agency (PHA). At each contract sunset, the owner has the option to renew the contract if certain conditions

are met. Conversely, the owner has the option to opt-out of a contract renewal. Under an opt-out action, HUD will provide the PHA tenant-protection vouchers which if used by the family to remain in-house will provide enhanced subsidy calculations to reduce the market rent burden, hence the name “Enhanced Voucher Assistance”.

As of August 24, 2022, the LACDA no longer holds active contracts under the Moderate Rehabilitation Program and will remove each program’s policy under the Administrative Plan. The LACDA will continue its goal of providing affordable housing opportunities through the Project-Based Voucher Program.

6. Removal of the Family Self-Sufficiency Program Chapter

The Family Self-Sufficiency (FSS) Program was designed to work in tandem with the LACDA rental assistance programs (such as HCV and Public Housing) to enable participating low-income families to increase their earned income, achieve economic stability, and reduce or eliminate their need for welfare assistance and rental subsidies.

Recent changes brought on by the passage of the Economic Growth, Regulatory Relief, and Consumer Protection Act, that was codified via the federal ruling process, amended HUD's regulations to the FSS Program. One significant amendment was an update to the FSS Action Plan which houses the administrative requirements of the program. Under this change, HUD provided PHA’s a template for the creation of a robust Action Plan that is all encompassing of the FSS Program administration and the tenant’s rights under the program.

For this reason, the FSS Action Plan will now be a separate policy. It is not required to be a part of the Administrative Plan and the FSS Program Chapter will be remove.

Admissions and Continued Occupancy Policy (ACOP) and Administrative Plan Proposed Joint Policies

The LACDA implemented major joint policy changes for the Public Housing and Section 8 tenant-based rental assistance programs. The revised Public Housing ACOP and the Section 8 Administrative Plan jointly reflect the following changes:

1. Streamline Annual Re-examination for Families with Fixed Income

Currently, the LACDA conducts annual re-examinations and requires third-party verification of all income sources to be obtained. However, the U.S. Department of Housing and Urban Development (HUD) permits Public Housing Agencies (PHAs) to streamline the income determination process at the Annual Re-examination for family members with fixed sources of income.

Upon Board approval, the LACDA will now include policies in its ACOP and Administrative Plan to streamline the annual re-examination process by applying the verified Cost of Living Adjustment (COLA) or interest rate to fixed-income sources. The LACDA will document in the file how the determination is made that a source of income is fixed income. Third party verification of fixed sources of income will be obtained during the admissions process and at least once every three years thereafter. If a family member with a fixed source of income is added, the LACDA will use third-party verification of all income amounts for that family member. If verification of the COLA or rate of interest is not available, the LACDA will obtain third-party verification of income amounts. Under discretionary policy, third-party verification of non-fixed income will be obtained annually regardless of the percentage of family income received from fixed income sources.

At the LACDA's discretion, the LACDA may obtain third-party verification of all income, regardless of the source. Furthermore, upon request of the family, the LACDA must perform third-party verification of all income sources.

Under this policy, families with 90 percent or more fixed income would be eligible for the streamlined annual re-examination process. Fixed sources of income include Social Security and SSI benefits, pensions, annuities, disability or death benefits, and other sources of income subject to a COLA or rate of interest.

2. Family Declaration of Assets under \$5,000

Currently, the LACDA's Public Housing and Section 8 tenant-based rental assistance programs must obtain third-party verification of all family assets upon admitting a family member to the program and then again at every re-examination of income thereafter.

Upon Board approval, the LACDA will continue to obtain third-party verification of all family assets upon admitting a family to the program and then again at least every three (3) years thereafter for families that legitimately are found to have assets under \$5,000. During the subsequent annual re-examinations, the LACDA will use this policy discretion to accept a family's declaration that it has total net assets equal to or less than \$5,000, without taking additional steps to verify the accuracy of the declaration. Meaning, if a family submits and signs such a declaration, then the LACDA will not need to request supporting documentation (e.g., bank statements) to verify the assets, or the amount of income expected to be received from those assets. HUD requirements to verify income from assets will be adhered to when a new family member is admitted.

3. Criminal Background Screening for Minors that May be Subject to a Lifetime Sex Offender Registration Requirement

In accordance with HUD's regulatory minimum screening standards, the LACDA has established standards that prohibit admission to the Public Housing and Section 8 tenant-based rental assistance programs if any member of the household is subject to a lifetime registration requirement under a State sex offender registration program. Having done so, the LACDA currently requires that a parent or guardian authorize the LACDA to obtain sex offender registration information of a minor between the ages of 13 through 17 years of age.

Effective July 1, 2023, the LACDA will no longer require minors to undergo a criminal background screening for a lifetime sex offender registration requirement under a State sex offender registration program to be eligible for program admission. Criminal background screening for lifetime sex offender registration requirement will continue uninterrupted for adult household members who are 18 years of age and older. This discretionary policy is being removed since it has resulted in no (zero) program admission denials for minors since its inception.

4. Verification of Disability

Under the LACDA's ACOP, Administrative Plan, and HUD requirements, verification of disability benefits from the Social Security Administration (SSA) is sufficient verification of disability for the purpose of qualifying for waiting list preferences and certain income disallowances and deductions.

Currently, the ACOP and Administrative Plan are silent on the availability of obtaining information about disability information through the HUD Enterprise Income Verification (EIV) system for family members claiming disability and are receiving disability benefits from the SSA, which is the highest form of verification under HUD's Verification Hierarchy.

Effective July 1, 2023, the ACOP and Administrative Plan policy for verifying disability will be updated to specify that the LACDA will first attempt to obtain information about disability benefits through HUD's EIV system for family members claiming disability and who are receiving disability benefits from the SSA. If documentation from HUD's EIV System is not available, the LACDA will request a current SSA benefit verification letter (dated within the last 60 days) from each family member claiming disability status. If the family is unable to provide the document(s), the LACDA will ask the family to either submit a complete verification of disability (VOD) form or request a benefit verification letter by either calling the SSA at 1-800-772-1213, or by requesting it from www.ssa.gov. Once the applicant or participant receives the benefit verification letter or VOD form, they will be required to provide it to the LACDA.

The Administrative Plan, and ACOP include language changes that are statutory, regulatory, and/or clarify existing policy.

Section 24 of the Code of Federal Regulations, Part §903.17, requires a public hearing to approve the Annual Plan. Copies of the Annual Plan were made available for review and comment during a public review and comment period from December 21, 2022 to February 06, 2023 at seven housing developments, LACDA administrative offices, and the LACDA website. Notices of the availability of the documents and the Board meeting date were also published in newspapers of general circulation during the public comment period.

The Summary of Public Outreach regarding the Annual Plan, a list of the seven Public Housing Program developments and the Annual Plan, are provided as Attachments, A, B, and C, respectively.

The Resolution approving the Annual Plan for submission to HUD, provided as Attachment D, has been approved as to form by County Counsel. At the conclusion of the Public Review and Comment period, the LACDA will provide to the Board all public comments pertaining to the Annual Plan. Public comments approved by the Board will be incorporated into the Annual Plan and submitted to HUD.

ENVIRONMENTAL DOCUMENTATION

Approval of the Annual Plan is exempt from the provisions of the National Environmental Policy Act (NEPA) pursuant to 24 Code of Federal Regulations, Part 58, Section 58.34 (a)(1), because it involves planning activities that will not have a physical impact on or result in any physical changes to the environment. The activities are also not subject to the provisions of CEQA pursuant to State CEQA Guidelines 15060(c)(3) and 15378, because they are not defined as a project under CEQA and do not have the potential for causing a significant effect on the environment.

Prior to implementation of any particular project, an Environmental Service Request will be submitted to the LACDA's Environmental Services Unit for review. Each project will receive an environmental clearance in accordance with CEQA Guidelines and NEPA regulations before proceeding with the project.

IMPACT ON CURRENT PROGRAMS

Submission of the Annual Plan is required by HUD for the receipt of CFP funds and for the continuation of the Public Housing and HCV Programs.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Emilio Salas", is positioned above the printed name.

EMILIO SALAS
Executive Director

Enclosures

Attachment A

Summary of Public Outreach

Section 511 of the QHWRA instructs every Public Housing Agency to convene one or more Resident Advisory Boards (RABs) to assist and make recommendations on the development of the Annual Plan, as well as on any significant amendments or modifications. Public Housing Program residents and HCV Program participants were invited to participate on the RAB to learn about programs included in the Annual Plan and to provide input.

Summary of RAB Activities

Public Housing Program

- On November 16, 2022, the LACDA mailed out an invitation to all Resident Council members to attend the December 2022, RAB meeting.
- Phone calls to each RAB member were done informing and inviting them to the RAB meeting.
- Transportation was provided to RAB members to attend the RAB meeting.
- Translation services in Russian were provided to one RAB member.
- 15 Resident Council members volunteered to participate in the development of the Annual Plan.
- Because of ongoing health concerns surrounding various diseases, the LACDA's regular annual RAB meetings were held with restrictions to ensure the health and safety of RAB members. In addition to limited in-person meetings, individual telephone calls were made, and conversations held with as many RAB members as possible.

Section 8

- An ongoing RAB recruitment is published on the LACDA website.
- The November 2022 issue of the Tenant Talk Newsletter advertised the RAB to all Section 8 program participants.
- 8 RAB members volunteered to participate in the development of the Annual Plan.
- Because of ongoing health concerns surrounding various diseases, the LACDA's regular annual RAB meetings were not held in person. In lieu of the in-person meetings, and to accommodate the LACDA's the RAB members, the LACDA held its annual RAB meeting via a ZOOM conference call. An email with details and instructions was sent out to RAB members and calls were made in advance to ensure RAB members would be able to attend the RAB meeting remotely.

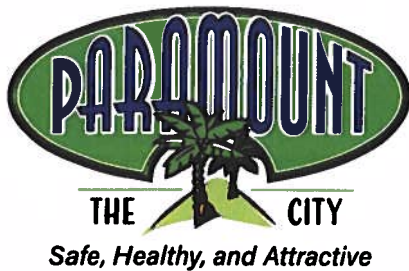
Other Outreach Activities

- In September 2022, an email to stakeholders was sent requesting policy or program changes.
- A summary of the RAB comments and LACDA responses are included in Attachment A of the Annual Plan.

- As needed, translators are made available during the Public Housing and Section 8 RAB meetings.
- In December 2022, a public notice was posted to all Public Housing residents notifying them of the Public Review and Comment Period.
- In December 2022, an email to stakeholders and participating cities was sent announcing the commencement of the Public Review period and inviting them to comment.
- In December 2022, a public notice announcing the Public Review and Comment Period was published in the Los Angeles Times, La Opinion, the Daily News, Los Angeles Sentinel, the Daily Breeze, and the Long Beach Press Telegram.
- In January 2023, Executive Summary and Administrative Plan were updated in response to the Los Angeles County Proclamation of a Local Emergency for Homelessness motion set forth by the Board of Supervisors. The LACDA updated its commitment of its expected voucher attrition from 50 percent to 100 percent.
- In January 2023, a letter was mailed to the LACDA's RAB was sent announcing the updated Executive Summary and Administrative Plan and provided an opportunity for the RAB members to express any comments and concerns.
- During the Public Review and Comment Period, the Annual Plan was made available at 11 housing developments, the LACDA Administrative Office in Alhambra, the Section 8 Palmdale office and the LACDA website.
- Summaries of the Annual Plan were available during the Public Review and Comment Period in Russian and Spanish at the above locations and on the LACDA's website.
- Information regarding the RAB and the Annual Plan is published annually in the Section 8 Tenant Talk newsletter.

Attachment B

<u>Housing Development</u>	<u>Address</u>	<u>District</u>
1. Nueva Maravilla	4919 E. Cesar Chavez Los Angeles, CA 90022	1
2. Francisquito Villa	14622 Francisquito Ave La Puente, CA 91746	1
3. South Scattered Sites Management office	12721 Central Avenue Los Angeles, CA 90059	2
4. South Bay Gardens	230 E 130 th St Los Angeles, CA 90061	2
5. Century & Wilton	10025 Wilton Pl Los Angeles, CA 90047	2
6. Marina Manor	3405 Via Dolce Marina Del Rey, CA 90292	2
7. Ocean Park	175 Ocean Park Blvd Santa Monica, CA 90405	3
8. Carmelitos Family	700 Via Wanda Long Beach, CA 90805	4
9. Harbor Hills	26607 S. Western Avenue Lomita, CA 90717	4
10. Orchard Arms	23520 Wiley Canyon Rd Valencia, CA 91355	5
11. Foothill Villa	2423 Foothill Blvd La Crescenta, CA 91214	5



VILMA CUELLAR STALLINGS
Mayor

ISABEL AGUAYO
Vice Mayor

ANNETTE C. DELGADILLO
Councilmember

PEGGY LEMONS
Councilmember

BRENDA OLMOS
Councilmember

City of Paramount
Planning Department
(562) 220-2036

February 6, 2023

Los Angeles County Development Authority – LACDA
700 W Main Street
Alhambra, CA 91801

RE: Public Comment – Proposed Annual Plan for Fiscal Years 2023-2024

To Whom It May Concern,

Thank you for posting the proposed Annual Plan document for public review for LACDA's progress in meeting the goals outlined in its 5-year Agency Plan, major program policies, and financial resources for both the Housing Authority Conventional Public Housing and Section 8 Tenant-Based Programs. On behalf of the City of Paramount, the Planning Department has reviewed the proposed Annual Action Plan for the 2023-2024 fiscal years and is happy to provide comments as attached to this letter. Thank you again for your consideration.

If you have any questions regarding this matter, please contact our office at 562-220-2036 or by email at planning@paramountcity.com. You are also welcome to contact me directly at 562-220-2049 or jking@paramountcity.com.

CITY OF PARAMOUNT

John King
Assistant Planning Director

SUMMARY OF COMMENTS

Streamlined Annual PHA Plan (High Performer PHAs)

Definitions:

I appreciate that the definitions are in the beginning of the report so that people understand some terms. However, since this is a public comment document, it would be useful to add a definition of what a PHA stands for and what it is. Some readers might not be familiar with the term.

Statement of Housing Needs and Strategy for Addressing Housing Needs:

I like this section of addressing housing needs. It would be clearer and organized if there were subsection headings for each housing needs topic such as Section 8, Public Housing, Homelessness, Elderly, etc. Including charts would be visually appealing and an attention grabber due to the detailed text of this document.

A. Local Objectives:

Listing ACOP's objectives was appreciated.

Chapter 2: Eligibility and Suitability for admission to Public Housing

Eligibility:

Many of the terms discussed should have had their definitions in the context for the reader's understanding. Also, using hyperlinks to refer to pages, or resources, should be added for more accessibility and to make the report more user-friendly.

Violence Against Women Act (VAWA):

Having this policy for perpetrator removal or documentation of rehabilitation is a great way to protect women experiencing domestic violence and a step in the right direction.

Suitability Criteria:

For suitability criteria, how would you assess current and past behavior? Do you work with a third party for background checks? What methods do you take for this? This section also talks about the rules and program requirements; it would be helpful to list those rules so that it is clear to the public. The report also mentions conducting an oral interview to evaluate the qualifications of the applicants to meet the requirements for tenancy. However, how can we ensure this is a fair practice without potential bias for participants? What is the purpose of a home visit? Is it to see their living conditions?

Denial of Admission of Persons Engaged in Violent Criminal Activity:

If applicants are denied due to criminal background, it would be helpful to add a link to housing that they can apply for or resources for them.

Chapter 3: Applications and Management of the Site Based Waiting Lists

I. Factors Other than Preferences that Affect Selection of Applicants:

We are glad that the report states that the unit size and availability can affect an applicant's position on the waiting list so applicants do not assume it is solely on a first come, first serve basis but rather there are complexities to the selection of applicants.

J. Income Targeting:

Inserting the most recent Fiscal Year Income limits table would be helpful for this section.

Elderly-Only Housing Developments:

This section lists the names of elderly housing developments, adding the city in which each development is located would be helpful for someone interested.

LACDA Incentives for Higher Income Families:

I understand that LACDA wants to bring in higher income individuals to live in low-income developments by incentivizing them, but this section does not state the incentives being given or considered.

Chapter 12: Lease Terminations

In this section, good standing means the former resident(s) demonstrated prompt rent paying habits and demonstrated and maintained adequate housekeeping standards. Who (or which agency) defines adequate living standards?

Chapter 16 Community Service Requirement

I was not aware of community service requirements. Providing a hyperlink to the economic self-sufficiency program would be a helpful resource to the public.

Chapter 19 Limited English Proficiency (LEP)

The LEP program is a great resource for the community. Using hyperlinks to possible existing informational handouts or the LACDA website can be informative and helpful for residents to get more information on how to sign up.

Glossary:

For some terms it is easier to explain in the section they are used in because some people might not have the time to go to the glossary to find a term's meaning. The glossary can be inaccessible to the general public at times.



March 1, 2023

VIA E-MAIL

John King, Assistant Planning Director
City of Paramount – Planning Department
16400 Colorado Avenue
Paramount, CA 90723

RE: RESPONSE TO PROPOSED FY 2023-2024 ANNUAL PLAN – PUBLIC COMMENT

Thank you for taking the time to review and offer recommendations for the Los Angeles County Development Authority's (LACDA) proposed Fiscal Year (FY) 2023-2024 Public Housing Admissions and Continued Occupancy Policy (ACOP) and Housing Choice Voucher (HCV) Program Administrative Plan changes.

The LACDA has reviewed the City of Paramount's recommendations and kindly provides the following responses:

- 1. Streamlined Annual PHA Plan (High Performer PHAs) - Definitions**
 - a. The LACDA should add a definition of what a PHA stands for and what it is. Some readers might not be familiar with the term.**

The LACDA would like to thank the City of Paramount for taking the time to review the LACDA's Annual Plan and appreciates all recommendations. The LACDA will ensure that PHA is fully clarified as Public Housing Agency.
- 2. Statement of Housing Needs and Strategy for Addressing Housing Needs**
 - a. The LACDA should create subsection headings for each housing topic, such as Section 8, Public Housing, Homelessness, Elderly, etc.**

The LACDA appreciates and will review the City of Paramount's recommendation to consider adding subsection headings.
 - b. Including charts would be visually appealing and an attention grabber due to the detailed text of this document.**

The LACDA will review the City of Paramount's recommendation and will consider adding charts where appropriate.



Administrative Office
700 West Main Street, Alhambra, CA 91801
Tel: (626) 262-4511 TDD: (626) 943-3898



Executive Director: Emilio Salas
Commissioners: Hilda L. Solis, Holly J. Mitchell, Lindsey P. Horvath, Janice Hahn, Kathryn Barger

3. Eligibility

- a. The City of Paramount urges that the LACDA include definitions of the terms discussed within the context for the reader's understanding. Additionally, the LACDA should add hyperlinks that refer to pages or recourses for added accessibility to the reader.**

The LACDA will review the planning documents to further enhance language regarding terms, rules, and program requirements. The LACDA will also assess the best way to add accessible hyperlinks within the document.

4. Violence Against Women Act (VAWA)

- a. The City of Paramount is content with the policy, more specifically regarding perpetrator removal and documentation of rehabilitation.**

The LACDA thanks the City of Paramount for reviewing the LACDA's VAWA policy and appreciates the positive feedback.

5. Suitability Criteria

- a. The City of Paramount would like clarification on how the LACDA assesses current and past behavior and the methods involved in completing background checks, specifically if third-party companies are used.**

The LACDA does its due diligence to properly evaluate all Public Housing program applicants. Please refer to Chapter 2 of the ACOP for eligibility and suitability for admission to public housing. The LACDA assesses current and past behavior by conducting detailed oral, personal, or virtual interviews of all applicants designed to evaluate qualifications to meet the essential requirements of tenancy. All applicants 18 years of age or older undergo a credit check and rental history check (National Credit Reporting), and a home visit may be completed for specific circumstances listed in Chapter 2. The LACDA's examination of relevant information pertaining to current and past behavior include a review of past performance in meeting financial obligations (especially rent), eviction records, history of criminal activity including criminal acts, drug-related criminal activity, acts of violence, history of alcohol or substance abuse, or evidence housing assistance termination for adverse actions, or owning money to a Housing Authority using a report from the U.S. Department of Housing and Urban Development. Criminal background screening is also conducted for all adult applicants, and results are taken into consideration for the purpose of determining resident suitability. The LACDA contracts with the Los Angeles County Sheriff's Department to process criminal background screening, and results may require additional screening through the Federal Bureau of Investigation following a Live-Scan fingerprinting process.

- b. The City of Paramount references the oral interviews conducted to evaluate the qualifications of the applicants to meet requirements for tenancy and would like to ensure that the LACDA conducts said interviews fairly and without biases.**

It is the policy of the LACDA to comply with the Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 et seq., by ensuring that housing is available to all persons without regard to race, color, religion, national origin, disability, familial status (having children under age 18), or sex. This policy means that, among other things, LACDA and its agents or employees must not discriminate in any aspect of housing, including but not limited to denying persons access to housing, because of race, color, religion, national origin, disability, familial status, or sex.

- c. The City of Paramount would like clarification on the purpose of home visits, specifically if they are meant to see the participant's living conditions.**

The purpose of a home visit, if necessary, would be to follow up on the specific circumstances outlined in Chapter 2 Part II section A Suitability Criteria. The LACDA's examination of relevant information pertaining to past and current habits or practices will include, but is not limited to, an assessment of eviction or records of disturbance of neighbors sufficient to warrant a police call, destruction of property, or living or housekeeping habits at present or prior residences, which may adversely affect the health, safety, or welfare of other residents or neighbors.

- d. The City of Paramount would find it helpful to provide link/resources to housing for applicants that have been denied due to criminal activity.**

The LACDA will review the procedure for denial based on criminal activity to determine how best to provide links/resources.

6. Factors Other than Preferences that Affect Selection of Applicants

- a. The City of Paramount is pleased with the report which mentions that the unit size and availability can affect an applicant's position on the waiting list.**

The LACDA appreciates the positive feedback in explaining the selection process.

7. Income Targeting

- a. It would be helpful if the LACDA would insert the most recent Fiscal Year Income Limits table.**

The updated tables are located on the LACDA's website www.lacda.org under Public Housing in the Eligibility tab. The Income Limits table is not included because the effective dates of revised annual income limits are not on the same cycle as the LACDA's planning documents.

8. Elderly-Only Housing Developments

- a. The City of Paramount urges that the LACDA include the city in which each housing development is located for overall clarity.**

The LACDA agrees with your recommendation and will add the cities to this list.

9. LACDA Incentives for Higher Income Families

- a. The City of Paramount urges that the LACDA include the incentives being given or considered for higher-income families.**

Specific incentives are not listed intentionally. This allows the LACDA flexibility to determine and offer incentives based on real-time circumstances, resources, and funding. The LACDA will review your recommendation and consider adding specific incentives to the policy.

10. Lease Terminations

- a. The City of Paramount would like clarification on who, or which agency, defines adequate living standards.**

Adequate living standards are defined by HUD under 24 CFR § 5.703.

11. Community Service Requirement

- a. The LACDA should include a hyperlink to the economic self-sufficiency program as a helpful resource to the public.**

All Public Housing program residents are notified about the LACDA's Family Self-Sufficiency Program. This information is also available to residents on our website www.lacda.org under Public Housing in the Self-Sufficiency tab, and through the Rent Café online tenant portal.

12. Limited English Proficiency (LEP)

- a. The City of Paramount is content with the LEP program but makes the recommendation of including hyperlinks to possible information handouts or the LACDA website for the convenience of residents.**

The LACDA appreciates your recommendation and will explore providing additional resources in other formats including the addition of hyperlinks for residents and the public. The LACDA also provides LEP assistance as needed and upon request. Additionally, the LACDA provides the Google Translate tool on the LACDA website to assist applicants, residents, and the public with accessing information in their primary language.

In closing, the LACDA would like to again thank the City of Paramount for its contributions towards the development of its FY 2023-2024 Annual Plan, and ultimately the families that it serves. The LACDA has benefited greatly from the collaboration of Los Angeles County agencies, Community Based Organizations and Legal Advocates over the years. The LACDA welcomes any future feedback to ensure that persons experiencing homelessness and all assisted families have complete access to its rental assistance programs.

Response to Public Comment

March 1, 2023

Page 5 of 5

Should you have any questions or future recommendations, you may contact Twima Earley, Director, Housing Operations Division at Twima.Earley@lacda.org or by phone at (626) 586-1900, or Aletheia Broom, Director, Housing Assistance Division at Aletheia.Broom@lacda.org or by phone at (626) 586-1670.

Sincerely,

A handwritten signature in black ink, appearing to read "Tracie Mann". The signature is fluid and cursive, with a large initial "T" and "M".

TRACIE MANN
Chief of Programs