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ALBUQUERQUE HOUSING AUTHORITY

**Attachment 1: Revision of Plan Elements**

**B.1 Housing Needs Statement and Revision of Plan Elements**

**Accessibility Policies:**

**Public Housing ACOP**

**Chapter 2 PART II: Policies Related to Persons with Disabilities**

**Revision:** Added the statement that “The AHA will display posters and other housing information and signage in locations throughout the AHA’s office in such a manner as to be easily readable from a wheelchair.”

**Section 8 Administrative Plan**

No Policy Changes to this Section

**Eligibility Policies**

**Public Housing ACOP**

**Chapter 3 Part III.B. Required Denial of Admission**

**Revision:** Removed the statement that “a conviction will be given more weight than an arrest”.

**Chapter 3 Part III.C Criminal Activity [24 CFR 960.203(c)]**

**Revision:** Removed the statement that “a conviction weighed more than an arrest or eviction”.

**Chapter 3 Part III. C Previous Behavior [960.203(c) and (d) and PH Occ GB, p. 48]**

**Revision:** Added criteria for furnishing information regarding situations when a household is denied Admission because of previous Housing Authority balance.

## Section 8 Administrative Plan

### Chapter 3 Section 3-III.B.: Mandatory Denial of Assistance

**Revision:** Removed “*A conviction will be given more weight than an arrest.*” when determining reasonable cause.

### Chapter 3 Section 3-III.C.: Other Permitted Reasons for Denial of Assistance Criminal Activity [24 CFR 982.553]

**Revision:** Removed “A conviction for drug-related or violent criminal activity will be given more weight than an arrest for such activity” in the evidence of criminal activity list.

### Chapter 3 Section 3-III.C: Previous Behavior in Assisted Housing [24 CFR 982.552(c)]

**Revision:** Clarification on denial of assistance due to a breach of a payment agreement:

*“When denying admission due to family debts as shown in HUD’s EIV system, the PHA will provide the family with a copy of the EIV Debt Owed to PHA and Termination report. If the family wishes to dispute the information in the report, the family must contact the PHA that entered the information in EIV in writing, explaining why EIV information is disputed. The family must also provide a copy of the letter and all applicable verification to the PHA to support the family’s claim. The PHA will consider the information provided by the family prior to issuing a notice of denial.”*

## Admission Policies:

### Public Housing ACOP

#### Chapter 4 Part II.C. Reopening the Waiting List

**Revision:** Added to criteria to ensure that public notices broadly reach potential applicants in all communities throughout the housing market area.

#### Chapter 4-II.F. Purging the Waitlist

**Revision:** Added the following statement to the AHA policy: “As part of the initial pre-application or application, the PHA will ask the family for their preferred methods of communication, which may include mail, phone, text message, email, or contact through a representative or service provider.” Additionally criteria was added for how AHA will communicate when a family is removed from the waiting list during the update process for failure to respond. Lastly reasons for why a household could be reinstated to the waitlist were expanded.

## Section 8 Administrative Plan

### Chapter 5 Section 5-I.B.: Oral Briefing [24 CFR 982.301(a)]

**Revision:** Added the following to the provision: “In briefing a family that includes a person with disabilities, PHA must also take steps to ensure effective communication.”

**Chapter 5 Section 5-I.B.: Briefing Packet [24 CFR 982.301(b)]**

**Revision:** Specified the need to include

- Information on how to complete a discrimination complaint form.
- Addition of “The family obligations under the program, including any obligations of a welfare-to-work family, and any obligations of other special programs if the family is participating in one of those programs.”
- The HUD pamphlet on lead-based paint entitled, “Protect Your Family from Lead in Your Home.”

**Chapter 5 Section 5-I.B.: Additional Items to Be Included in the Briefing Packet**

**Revision:** Removal of the “Protect Your Family from Lean in Your Home” since it was added to the list of required documents.

**Financial Resources**

AHA has committed operating resources in FY2023 to public housing of \$5.9 million and \$28 million in Housing Choice Voucher Program, and \$3.5 million in central office cost center operations. See chart on the next page.

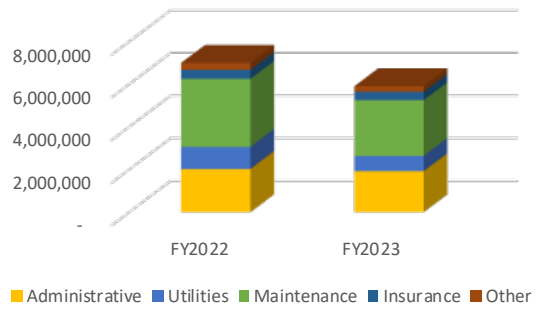
Affordable housing in the Albuquerque Metropolitan area is in high demand. AHA is participating in partnerships and cooperative support to many housing projects. AHA has expanded their Project Based Voucher (PBV) program and committed to Rental Assistance Demonstration (RAD) projects in the next five years. In CY 2022 AHA converted 20% of housing units to RAD and has budgeted additional funds for more RAD conversion.

Future development at AHA includes conversion of public housing properties with rehabilitation of units as well as new construction in CY 2023 and 2024. Funding of these development projects come from federal dollars and nonfederal dollars. In addition to bringing in outside resources for development, AHA has committed \$7.5 million dollars to the projects in CY2023 and 2024. The composition of this funding is made of Development Reserves, Investment funds from former developments, and public housing reserves.

**Albuquerque Housing Authority  
FY 2023 Budget Summary**

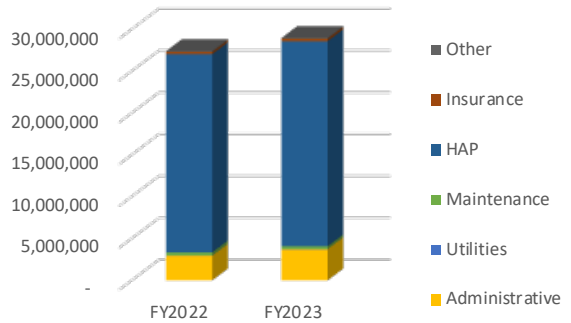
Public Housing	FY2022	FY2023
Revenue	\$ 6,934,813	\$ 5,905,977
<b>Expenses</b>		
Administrative	2,021,741	1,921,635
Utilities	1,042,500	714,986
Maintenance	3,186,901	2,611,672
Insurance	416,485	396,587
Other	331,981	261,097
<b>TOTAL EXPENSES</b>	<b>6,999,609</b>	<b>5,905,978</b>
<b>Net Income (Loss)*</b>	<b>(64,796)</b>	<b>0</b>

**Public Housing Budget**



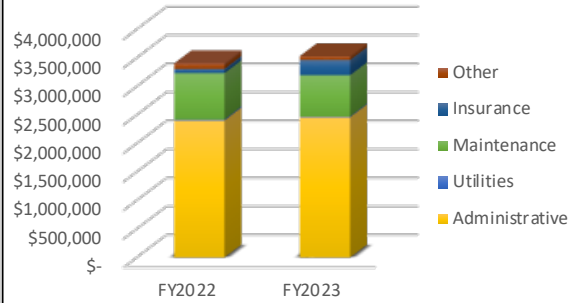
Section 8	FY2022	FY2023
Revenue	\$ 27,351,151	\$ 27,938,151
<b>Expenses</b>		
Administrative	2,945,699	3,719,109
Utilities	25,663	29,445
Maintenance	368,928	319,611
HAP	23,696,757	24,515,963
Insurance	270,735	313,023
Other	88,869	65,000
<b>TOTAL EXPENSES</b>	<b>\$ 27,396,651</b>	<b>\$ 28,962,150</b>
<b>Net Income (Loss)*</b>	<b>(45,500)</b>	<b>(1,024,000)</b>

**Section 8 Budget**



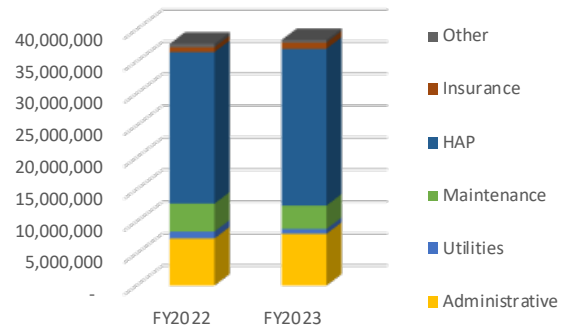
Central Office	FY2022	FY2023
Revenue	\$ 3,391,612	\$ 3,494,980
<b>Expenses</b>		
Administrative	2,401,280	2,459,651
Utilities	20,701	15,852
Maintenance	809,811	720,783
Insurance	74,612	268,716
Other	98,266	65,000
<b>TOTAL EXPENSES</b>	<b>\$ 3,404,671</b>	<b>\$ 3,530,002</b>
<b>Net Income (Loss)*</b>	<b>(13,059)</b>	<b>(35,021)</b>

**Central Office Budget**



Agency Total	FY2022	FY2023
Revenue	\$ 37,677,576	\$ 37,339,108
<b>Expenses</b>		
Administrative	7,368,720	8,100,395
Utilities	1,088,864	760,283
Maintenance	4,365,640	3,652,065
HAP	23,696,757	24,515,963
Insurance	761,832	978,326
Other	519,116	391,097
<b>TOTAL EXPENSES</b>	<b>37,800,929</b>	<b>38,398,129</b>
<b>Net Income (Loss)*</b>	<b>(123,353)</b>	<b>(1,059,021)</b>

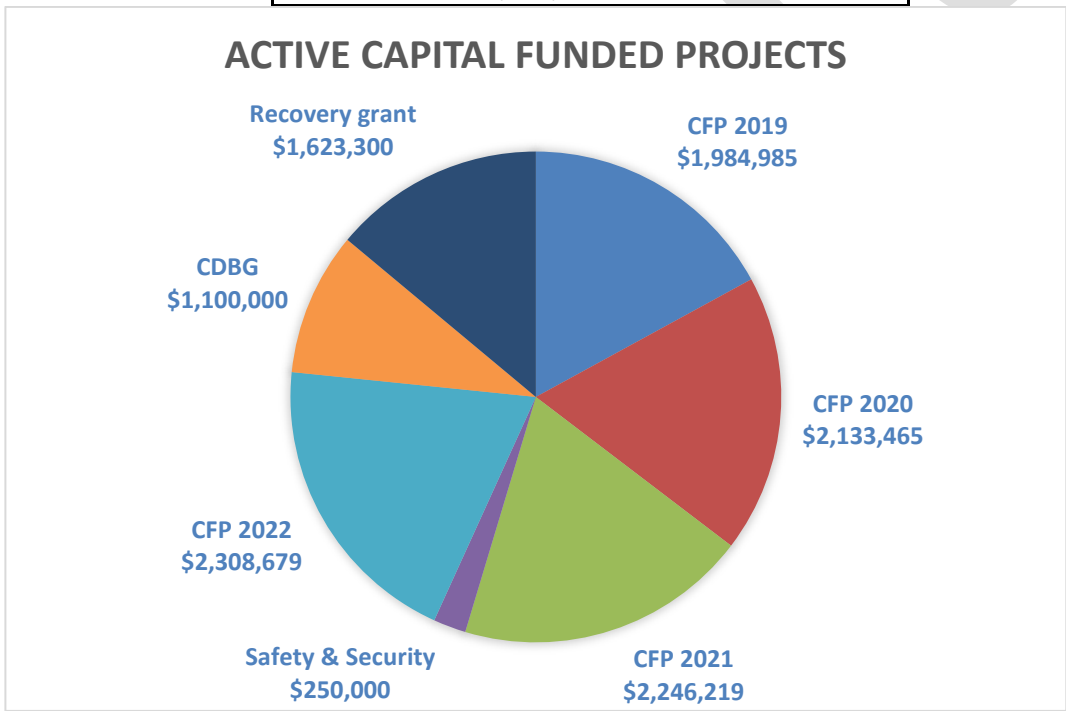
**AHA Budget Totals**



\* a net loss is budgeted to utilize reserves

Capital funds and asset improvements continue to be a priority to AHA. AHA has committed roughly \$11.6 million dollars in FY2023-2024 to capital improvements on the public housing properties. AHA is a recipient of additional funding to enhance our properties such as the safety grants, and CDBG funds available through our local municipality, the City of Albuquerque. The following chart demonstrates the increased capital funds awarded to our agency over the years.

Active - Capital Funded Projects		
CY	Amount	Grant Award
2019	\$ 1,984,985	CFP 2019
2020	\$ 2,133,465	CFP 2020
2021	\$ 2,246,219	CFP 2021
2022	\$ 250,000	Safety & Security
2022	\$ 2,308,679	CFP 2022
2022	\$ 1,100,000	CDBG
2022	\$ 1,623,300	Disaster Recovery
	<b>\$ 11,646,648</b>	



## Operation and Management Policies

### Public Housing ACOP

#### **Chapter 6 Part I.G Imputing Income from Assets [24 CFR 5.609(b)(3), Notice PIH 2012-29]**

**Revision:** Deleted specific dates for the review of the passbook and added the statement that “the effective date of changes to the passbook rate will be determined at the time of the review.”

#### **Chapter 6 Part I.H Lump-Sum Payments for the Delayed Start of a Periodic Payment**

**Revision:** The following statement was added to the AHA policy: Effective the day after SSA has announced the COLA, PHAs are required to factor in the COLA when determining Social Security and SSI annual income for all annual reexaminations and interim reexaminations of family income that have not yet been completed and will be effective January 1st or later of the upcoming year [Notice PIH 2018-24].

#### **Chapter 6 Part II.F Eligible Child Care Expenses**

**Revision:** Added criteria that AHA will use the schedule of child care costs from a qualified local entity that either subsidizes child care costs or licenses child care providers.

#### **Chapter 6 Part III.C Reasonable Accommodation**

**Revision:** Added policies and procedures for requesting and making reasonable accommodations to utility allowance schedules.

#### **Chapter 7 Part I.B HUD’s Verification Hierarchy [Notice PIH 2018-18]**

**Revision:** Clarified procedures for the review of photocopies.

#### **Chapter 7 Part I.D Written Third-Party Verification [Notice PIH2018-18]**

**Revision:** Added the following statement to the AHA policy: “At AHA’s discretion, if additional paystubs are needed due to the family’s circumstances (e.g., sporadic income, fluctuating schedule, etc.), AHA may request additional paystubs or a payroll record.”

**Chapter 7 Part I.E Self Certification:** Deleted the criteria that all self-certifications must be signed in the presence of an AHA representative or AHA notary public.

#### **Chapter 7 Part II A Verification of Legal Identity**

**Revision:** Added clarification to the types of document accepted and deleted the criteria that self-certifications must be signed in the presence of an AHA representative or AHA notary public.

**Chapter 7 Part III.C. Periodic Payments and Payments in Lieu of Earnings**  
**Revision:** Removed policy on SS/SSI verifications mandating that AHA staff request SSA verification letter to verify benefits.

**Chapter 8 Part I.B. Orientation Agenda**

**Revision: Added the following topics to the Agenda:** A notice that includes the procedures for requesting relief and the PHA's criteria for granting requests for relief for excess utility surcharges. The HUD pamphlet on lead-based paint entitled, "Protect Your Family from Lead in Your Home."

**Chapter 8 Part I.F. Late Fees and Nonpayment [24 CFR 966.4(b)(3); Notice PIH 2021-29]**

**Revision:** Clarified under what conditions a 14 day or 30 day Notice of non-payment will be issued.

**Chapter 8 Part II.C. Notice & Scheduling of Inspections**

**Revision:** Added the following statement to the AHA policy: "Except for emergencies, management will not enter the dwelling unit to perform inspections where a pet resides unless accompanied for the entire duration of the inspection by the pet owner or responsible person designated by the pet owner in accordance with the pet policies in Section 10-II.D."

**Chapter 8 Part II.D Emergency Repairs [24 CFR 966.4(h)]**

**Revision: Added** "In situations where the unit or building has a fuel burning appliance or an attached garage, missing or inoperable carbon monoxide detectors" as part of the definition of "Defects hazardous to life, health or safety".

**Chapter 8 Part II.D Non-Emergency Repairs**

**Revision:** Added the following statement to the AHA policy: 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.

**Chapter 9.I D Conducting Annual Reexaminations**

**Revision:** added the language "or any stated deadline" to the policy regarding the timeline households have to submit requested documentation.

**Chapter 12 Part I.C. Emergency Transfer Procedures**

**Revision:** Changed process for transfers due to an emergency work orders.

**Chapter 13 Part III.C. Over-Income Families [24 CFR 960.261; FR Notice 7/26/18 Notice PIH 2019-11]**

**Revision:** Adds stipulation to AHA policy that until such time as the final rule related to alternative rent amounts becomes legally effective, the AHA will not

terminate the assistance of over-income families or charge such families an alternative rent.

#### **Chapter 13 Part IV.D. Lease Termination Notice**

**Revision:** Added the following statement to the AHA policy: Further, during the period of time for which HUD determines that a national emergency requires additional time for families to secure funding, all termination notifications for nonpayment of rent must include, at a minimum, the language provided in the Appendix of Notice PIH 2021-29.

### **Section 8 Administrative Plan**

#### **Chapter 7 Section 7-I.B. Requirements for Acceptable Documents and 7-II.A. Verification of Legal Identity**

**Revision:** The requirement that family self-certifications **must** be signed by the family member whose information or status is being verified.

#### **Chapter 7 Section 7-I.E.: Self-Certification and 7-II.A. Verification of Legal Identity**

**Revision:** The requirement that “All self-certifications must be signed in the presence of an AHA representative or notary public” was removed.

#### **Chapter 7 Section 7-II.B. Social Security Numbers**

**Revision:** The directive that AHA will **not** remove and destroy copies of documentation accepted as evidence of social security numbers was added to the AHA Policy section.

#### **Chapter 7 Section II.D. Absence of Adult Member**

**Revision:** The AHA Policy for “Absence of Adult Member” added the language “if the AHA requests” when referring to proving evidence to support that the adult member is no longer a member of the family.

#### **Chapter 9 Section 9-I.B. Requesting Tenancy Approval**

**Revision:** Expanded the options that households have on submitting RAFTAs to AHA and clarifies how missing information will be obtained.

#### **Chapter 9 Section 9.I.H. Changes in Lease or Rent**

**Revision:** Language modified to clarify and align with the HAP contract: “prior to recertification date” was changed to “of receiving the request” in a clarification of the timeline on the process of changes in rent. Also the following statement was added to the policy to clarify the timeline on the enactment of a rent change to AHA and the tenant:

“Rent increases will go into effect on the first of the month following the 60 day period after the owner notifies the PHA of the rent change or on the date specified by the owner, whichever is later.” -



**Chapter 10 Section 10 II.B. Initial Billing Deadline [Notice PIH 2016-09]**

**Revision:** The following language giving AHA discretion to accept late billing was added: “The initial PHA’s decision as to whether to accept late billing will be based on internal PHA factors, including the initial PHA’s leasing or funding status.”

**Chapter 17 II.F Promoting Partially Assisted Projects [24 CFR 983.56(c)]**

**Revision:** Added the definition of a “Project” to the AHA policy.

**Chapter 17 Section VI.C. Organization of the Waiting List:**

**Revision:** Expanded the list of Developments that are the current AHA Waitlists and expanded the list of Developments that are anticipated to be added AHA Waitlists.

**Chapter 18 Section V.D Organization of the Waiting List**

**Revision:** Expanded the list of Developments that are the current AHA Waitlists and expanded the list of Developments that are anticipated to be added AHA Waitlists.

**Chapter 18 VI.E Family’s Right to Move**

**Revision:** Added a policy that ensures that residents are fully aware of and understand their rights under choice mobility, and that AHA will inform families of their rights under the choice mobility option and the benefits to moving to lower poverty areas, and provide a summary of the steps necessary to exercise this option, at the time the family signs the lease for the RAD PBV unit and during their annual recertification.

**Chapter 18 VI.E Moving with Continued Assistance under Choice Mobility**

**Revision:** Added the following language to the AHA policy: The AHA will not subject RAD PBV families applying for choice mobility vouchers to any additional rescreening requirements in order to receive a tenant-based voucher. Families exercising choice mobility will not be required to vacate their units before a lease has been entered into using their tenant-based voucher. At the time the PHA issues a choice mobility voucher, the PHA will notify the family of their right to remain in their unit if they are unable to find a rental unit using the tenant-based voucher.

**Chapter 18 Section VII.B Adjusting Contract Rents**

**Revision:** Added a policy describing the timelines, the criteria and the methods used to request, review and approve Contract Rent Adjustments.

**Chapter 18 VIII.D Phase in of Tenant Rent Increases**

**Revision:** Added the following language to the AHA policy: If the family’s income falls during the phase-in period such that the currently calculated PBV TTP falls below the amount that would otherwise be the phased-in rent, the family pays the currently calculated PBV TTP and the phase-in ends

**Chapter 18 Exhibit 18-I PBV Development Information**

**Revision:** The Exhibit was updated.

## Grievance Procedures

### Public Housing ACOP

No Policy Revisions for this Section.

### Section 8 Administrative Plan

#### **Chapter 12-I.E. Use of Illegal Drugs and Alcohol Abuse**

**Revision:** The PHA will consider all credible evidence, including but not limited to, any record of arrests, convictions, or eviction of household members related to the use of illegal drugs or abuse of alcohol.

#### **Chapter 12-I.E. Insufficient Funding [24 CFR 982.454]**

**Revision:** The following language was added to the termination of HAP contracts due to insufficient funding: “Families who have been assisted in the HCV program the longest will be the first to be terminated, excluding families that include elderly or disabled family members.”

#### **Chapter 16 Section IV.A. Overview**

**Revision:** Removed list of specific collection alternatives to collecting monies owned.

#### **Chapter 16 Section IV. B. Repayment Policy**

**Revision:** Added “When an owner refuses to repay monies owed to the PHA, the PHA will utilize other available collection alternatives including, but not limited to, the following: collection agencies, small claims court, civil lawsuit, state income tax set-off program”

#### **Chapter 16 Section IV. B. Family Debts to AHA: Refusal to Enter into an Agreement**

**Revision:** Added “When a family refuses to repay monies owed to the PHA, in addition to termination of program assistance, the PHA will utilize other available collection alternatives including, but not limited to, the following: collection agencies, small claims court, civil lawsuit, state income tax set-off program”

## Pet Policy

### Public Housing ACOP

#### **Chapter 10 Part II.C Standards for Pets [24 CFR 5.318; 960.707(b)]**

**Revision:** Added a statement that Cat declawing is not a requirement or condition of pet ownership in public housing and HUD encourages PHAs to refrain from engaging in this practice [New PH OCC GB, *Pet Ownership*, p. 9].

#### **Chapter 10 Part II.D. Pet Rules/Inspections and repairs**

**Revision:** Added a policy stating that except for emergencies management will not enter unit if a pet is present unless someone is present to handle the pet.

### **Asset Management**

AHA has transitioned to the property management Best Practices model. By doing this staff is located at on site offices and all property staff reports to a Property Manager. The Property Manager is responsible for the day to day operations of the property.

AHA has also applied for and is in the process of doing the following:

- Conversion of 5 properties in the Rental Assistance Demonstration program (RAD) and layered the properties with Low Income Housing Tax Credits (LIHTC). Two additional properties have received CHAPs and have received LIHTC. An additional property will be applying in the next year.
- Applied to the City of Albuquerque for Community Development Block Grants (CDBG) and received grant monies to replace roofs.
- Applied and received Energy Performance Contracts (EPC)
  - replaced heaters and water heaters with energy efficient appliances
  - added Solar energy to several large properties
  - installed low flow water devices and energy efficient lighting in all units
- Completing a Physical Needs Analysis (PNA) and are planning Capital funding around the long term needs identified in the PNA.