

# **HOUSING AUTHORITY OF THE CITY OF AUSTIN**

## **BOARD OF COMMISSIONERS**

**Chairperson - Carl S. Richie, Jr.**

**Charles Bailey**

**Tyra Duncan-Hall**

**Isaac Robinson**

**Edwina Carrington**

**Michael G. Gerber, President & CEO**



## **BOARD OF COMMISSIONERS Regular Meeting**

**Thursday, April 20, 2017  
at 12:00 noon**

**HACA's Central Office**

**1124 S. IH 35  
Austin, Texas**

**PUBLIC NOTICE OF A MEETING  
TAKE NOTICE OF A BOARD OF COMMISSIONERS  
REGULAR BOARD MEETING  
OF THE HOUSING AUTHORITY OF THE CITY OF AUSTIN**

**TO BE HELD AT  
HACA Central  
1124 S. IH 35, Austin, Texas  
(512.477.4488)**

**COMMENCING AT 12:00 NOON ON THURSDAY, APRIL 20, 2017, TO CONDUCT BUSINESS AS FOLLOWS:**

**CALL TO ORDER, ROLL CALL  
CERTIFICATION OF QUORUM**

**Carl S. Richie, Jr., Chairperson**

*Pledge of Allegiance*

*Citizens Communication - (Note: There will be a three-minute time limitation)*

*Citywide Advisory Board Update*

*Employee of the Quarter*

**CONSENT AGENDA**

Items on the Consent Agenda may be removed at the request of any Commissioner and considered at another appropriate time on this agenda. Placement on the Consent Agenda does not limit the possibility of any presentation, discussion, or action at this meeting. Under no circumstances does the Consent Agenda alter any requirements under Chapter 551 of the Texas Government Code, Texas Open Meetings Act.

**CONSENT AGENDA**

**APPROVAL OF THE FOLLOWING ITEMS PRESENTED IN THE BOARD MATERIALS:**

- |                 |   |  |
|-----------------|---|--|
| <b>ITEM 1A:</b> | Presentation, Discussion, and Possible Action regarding the Approval of a Board Minutes Summary for the Board Meeting held on March 9, 2017   | <b>Michael Gerber</b><br>President & CEO                         |
| <b>ITEM 1B:</b> | Presentation, Discussion and Possible Action regarding Resolution No. 2491: Approving the Write-off of the uncollectible accounts of vacated tenants for the seven-month period ending March 31, 2017   | <b>Thomas Cherian</b><br>Chief Financial Officer                 |
| <b>ITEM 1C:</b> | Presentation, Discussion and Possible Action on Resolution No. 2493: Approval of the Public Housing Utility Allowances and Flat Rents   | <b>Pilar Sanchez</b><br>Vice President, Housing & Community Dev. |
| <b>ITEM 1D:</b> | Presentation, Discussion and Possible Action on Resolution No. 2494: Approval of the Affirmative Fair Housing Marketing Plans for Gaston Place, Booker T. Washington, Meadowbrook and Thurmond Heights. | <b>Pilar Sanchez</b><br>Vice President, Housing & Community Dev. |
| <b>ITEM 1E:</b> | Presentation, Discussion and Possible Action of Resolution No. 2495: Approval of a Contract for Thurmond Heights Site Lighting Renovations  | <b>Jimi Teasdale</b><br>Dir. Planning & Dev.                     |

**ACTION ITEMS**

**APPROVAL OF THE FOLLOWING ITEMS PRESENTED IN THE BOARD MATERIALS:**

- |                |  |  |
|----------------|--|--|
| <b>ITEM 2:</b> | Presentation, Discussion and Possible Action regarding Resolution No 2492: Authorizing HACA to Project-base up to 25 Veterans Affairs Supportive Housing (VASH) Vouchers to Elysium Grand and Wholes Manor Apartment DeLoach Property Interest in response to a Request for Proposal issued on February 13, 2017 | <b>Lisa Garcia</b><br>Vice President, Assisted Housing |
| <b>ITEM 3:</b> | Presentation, Discussion and Possible Action of Resolution No. 2496: Authorizing the Housing Authority of the City of Austin to take the following actions with regard to the Sterling Springs Apartments in Austin, Texas   | <b>Ron Kowal</b><br>Vice President of AAHC             |

\*The Housing Authority of the City of Austin (HACA) Board of Commissioners reserves the right to discuss and consider items out of order on the agenda on an as needed basis.

The Housing Authority of the City of Austin is committed to compliance with the Americans with Disability Act. Reasonable modifications and equal access to the communications will be provided upon request. Meeting locations are planned with wheelchair access. If requiring Sign Language Interpreters or alternative formats, please give notice at least 2 days (48 hours) before the meeting date. Please call Judy Paciocco or Nidia Hiroms at HACA at 512.477.4488, for additional information; TTY users route through Relay Texas at 711. For more information on HACA, please contact Nidia Hiroms at 512.477.4488 x 2104.

*The Board will hold a Work Session to discuss HUD's Rental Assistance Demonstration (RAD) and the use of the program to improve HACA properties.*

## **EXECUTIVE SESSION**

**Carl S. Richie, Jr.,** Chairperson

The Board may go into Executive Session (close its meeting to the public) Pursuant to:

- a. § 551.071, Texas Gov't Code, consultations with Attorney regarding legal advice, pending or contemplated litigation; or a settlement offer;
- b. §551.072, Texas Gov't Code, discussion about the purchase, exchange, lease or value of real property;
- c. §551.074, Texas Gov't Code, discuss the appointment, employment, evaluation, reassignment, duties, discipline, or dismissal of a public officer or employee; or to hear a complaint or charge against an officer or employee, including but not limited to evaluation of the President/CEO.
- d. §551.087, Texas Gov't Code, discuss certain economic development negotiations.

## **OPEN SESSION**

If there is an Executive Session, the Board will return to Open Session for discussion, consideration and possible action of matters discussed in Executive Session.

## **REPORTS**

The Board accepts the following reports:

- President's Report
- Other Staff Reports
- Commissioners' Reports/Questions to the Department Staff

## **ADJOURNMENT**

**"Pursuant to § 30.06, Penal Code, (trespass by holder of license with a concealed handgun), a person licensed under Subchapter H, Chapter 411, Government Code (handgun licensing law), may not attend this meeting with a concealed handgun."**

**"Pursuant to § 30.07, Penal Code (trespass by holder of license with an openly carried handgun), a person licensed under Subchapter H, Chapter 411, Government Code (handgun licensing law), may not attend this meeting with a handgun that is carried openly."**

**"En virtud del § 30.06, Código Penal, (traspaso titular de licencia con una pistola), una persona bajo el subcapítulo H, capítulo 411, código de gobierno (Ley de licencia de arma o pistola), no se permiten en este reunión con una arma o pistola."**

**"En virtud del § 30.07, Código Penal (prevaricación por titular de la licencia con un arma o pistola abiertamente llevado), una persona bajo el subcapítulo H, capítulo 411, código de gobierno (Ley de licencia de arma o pistola), no se permiten en esta reunión con un arma o pistola que lleva abiertamente."**

**HOUSING AUTHORITY OF THE CITY OF AUSTIN  
BOARD OF COMMISSIONERS  
REGULAR BOARD MEETING**

**Citywide Advisory Board Report**

**April 20, 2017  
Regular Meeting**



**HOUSING AUTHORITY OF THE CITY OF AUSTIN  
BOARD OF COMMISSIONERS  
REGULAR BOARD MEETING**

**Employee of the Quarter**

**April 20, 2017  
Regular Meeting**

**HOUSING AUTHORITY OF THE CITY OF AUSTIN  
BOARD OF COMMISSIONERS  
REGULAR BOARD MEETING**

**CONSENT AGENDA**

**AGENDA ITEM NO. 1A**

**Presentation, Discussion, and Possible Action regarding the  
Approval of a Board Minutes Summary for the Board  
Meeting held on March 9, 2017**

# HOUSING AUTHORITY OF THE CITY OF AUSTIN BOARD OF COMMISSIONERS REGULAR BOARD MEETING

MARCH 9, 2017

## SUMMARY OF MINUTES

**THE HOUSING AUTHORITY OF THE CITY OF AUSTIN (HACA) BOARD OF COMMISSIONERS PUBLIC MEETING NOTICE WAS POSTED FOR 12:00 NOON ON THURSDAY, MARCH 9, 2017, AND WAS HELD AT HACA'S CENTRAL OFFICE, 1124 S. IH 35, AUSTIN, TEXAS**

### **CALL TO ORDER, ROLL CALL, CERTIFICATION OF QUORUM**

The BOARD OF COMMISSIONERS REGULAR BOARD MEETING of the HOUSING AUTHORITY OF THE CITY OF AUSTIN, of MARCH 9, 2017, was called to order by Carl S. Richie, Chairperson, at 12:06 p.m. The meeting was held at HACA's CENTRAL OFFICE, 1124 S. IH 35, AUSTIN, TEXAS

Roll call certified a quorum was present.

#### **MEMBERS PRESENT:**

Carl S. Richie, Jr., Chairperson  
Tyra Duncan-Hall, 2<sup>nd</sup> Vice Chairperson  
Edwina Carrington, Commissioner  
Isaac Robinson, Commissioner

#### **MEMBER(S) ABSENT:**

Charles Bailey, Vice Chairperson

#### **STAFF PRESENT:**

Ann Gass, Andrea Galloway, Catherine Crago, Eileen Schrandt, Judy Paciocco, Kelly Crawford, Lisa Garcia, Michael Cummings, Michael Gerber, Michael Roth, Nidia Hiroms, Nora Morales, Pilar Sanchez, Ron Kowal, Subra Narayaniyer, Suzanne Schwertner, Sylvia Blanco and Thomas Cherian.

**Suki Steinhauser, Chief Executive Officer and Eric Metcalf, Chief of Program Strategy with Communities in Schools,** gave an update on Communities in Schools and its work with HACA at-risk students.

**CITIZENS COMMUNICATION** – No public comment received.

**CITYWIDE ADVISORY BOARD (CWAB) REPORT** – **Rachel Martinez** from Georgian Manor, is the newly elected CWAB President. The next CWAB will be held March 14<sup>th</sup> and topics of discussion include formalizing board procedures and conducting board training. The CWAB will have a full report for the Board at the April meeting.

**PUBLIC HEARING** *To accept public comment on the proposed financing and development of three developments which have previously been considered by the Board of Commissioners: 1) Bridges at Canyon View LP., located at 4506 E. William Cannon, Austin, Texas 78744; 2) Bridges at Cameron LP, located at 9201 Cameron Road, Austin, Texas 78754; and 3) Commons at Goodnight, LP., located at 2202 Slaughter Lane, Austin, Texas 78748*

**CITIZENS COMMUNICATION** – No public comment received.

### **CONSENT AGENDA**

#### **APPROVAL OF THE FOLLOWING ITEMS PRESENTED IN THE BOARD MATERIALS:**

**ITEM 1A: Presentation, Discussion, and Possible Action regarding the Approval of a Board Minutes Summary for the Board Meeting held on February 16, 2017**

**Commissioner Robinson** moved to approve the Board Minutes Summary for the Board Meeting held on February 16, 2017 as presented. **Commissioner Carrington** seconded the motion. The motion passed. (4-Ayes and 0-Nays).

**ITEM 1B: Presentation, Discussion, and Possible Action regarding the Approval of Resolution No. 2483: Approval to ratify all actions taken by the Board of Commissioners during FYE 2017, in order to resolve any irregularities which may have occurred regarding a quorum or vote by the Commissioners as reflected within the approved minutes and resolutions**

**Commissioner Robinson** moved to approve Resolution No. 2483: Approval to ratify all actions taken by the Board of Directors during FYE 2017, in order to resolve any irregularities which may have occurred regarding a quorum or vote by the Directors as reflected within the approved minutes and resolutions. **Commissioner Carrington** seconded the motion. The motion passed. (4-Ayes and 0-Nays).

**ITEM 1C: Presentation, Discussion, and Possible Action regarding the Approval of Resolution No. 2484: Authorizing Execution, Recording and Delivery of Declaration of Trusts for all Public Housing Developments/AMPS**

Per PIH Notice 2010-44, all public housing property owned by a Public Housing Authority that has been acquired, developed, maintained, or assisted with funds from the U.S. Housing Act of 1937 must review its Declarations of Trust (DOTs) on an annual basis and to file accordingly with the county clerk's office and the U.S. Department of Housing and Urban Development. In order to be in compliance, the Housing Authority will ensure each Declaration of Trust conforms with the correct Asset Management Project or "AMP" number to incorporate all "project" numbers associated with that AMP, as there may be multiple public housing sites assigned to one AMP

**Commissioner Robinson** moved to approve Resolution No. 2484: Authorizing Execution, Recording and Delivery of Declaration of Trusts for all Public Housing Developments/AMPS. **Commissioner Carrington** seconded the motion. The motion passed. (4-Ayes and 0-Nays).

**ITEM 1D: Presentation, Discussion and Possible Action regarding Resolution No. 2485: Awarding a one year renewal contract for Trash Disposal & Recycling Services (HACA-15-B-196) to Waste Management Inc.**

Waste Management Inc. of Texas currently provides trash disposal and recycling services for HACA and staff has generally been pleased with their services. Staff recommendation is to renew this contract for the second two year renewal option. The Contractor shall furnish all material, labor, and equipment necessary to comply with the terms of this contract.

**Commissioner Robinson** moved to approve Resolution No. 2485: Awarding a one-year renewal contract for Trash Disposal & Recycling Services (HACA-15-B-196) to Waste Management Inc. in an amount not to exceed \$265,000 per year. **Commissioner Carrington** seconded the motion. The motion passed. (4-Ayes and 0-Nays).

**ITEM 1E: Presentation, Discussion and Possible Action regarding Resolution No. 2486: Awarding a one year renewal contract for Grounds Maintenance Services (HACA-10-B-188) to Unity Contractor Services**

Unity Contractor Services currently provides grounds maintenance services for HACA and staff has been pleased with their services. Staff recommendation is to renew this contract for the 3rd year of a four year contract. Staff also recommends a 3% increase for the 3<sup>rd</sup> year of the contract reflecting increased labor and other costs. Total contract amount not to exceed \$253,874.40. The Contractor shall furnish all material, labor, and equipment necessary to comply with the terms of this contract.

**Commissioner Robinson** moved to approve Resolution No. 2486: Awarding a one-year renewal contract for Grounds Maintenance Services (HACA-10-B-188) to Unity Contractor Services. **Commissioner Carrington** seconded the motion. The motion passed. (4-Ayes and 0-Nays).

**ACTION ITEMS**

**APPROVAL OF THE FOLLOWING ITEMS PRESENTED IN THE BOARD MATERIALS:**

**ITEM 2: Presentation, Discussion, and Possible Action regarding the Approval of Resolution No. 2487: Approving the Operating Budgets For the Fiscal Year April 1, 2017 to March 31, 2018**

**Commissioner Duncan-Hall** moved to approve Resolution No. 2487: Approving the Operating Budgets For the Fiscal Year April 1, 2017 to March 31, 2018. **Commissioner Robinson** seconded the motion. The motion passed. (4-Ayes and 0-Nays).

**ITEM 3: Presentation, Discussion and Possible Action regarding Resolution No 2488: Authorizing HACA to Project-base 25 Housing Choice Vouchers to Austin/Travis County Integral Care in response to a Request for Proposals issued on December 25, 2016**

HUD regulations allow communities that are participating in the Housing Choice Voucher Program to project-base up to 20 percent of its allocated vouchers. HACA's Housing Choice Voucher Program Administrative plan authorizes the Housing Authority of the City of Austin (HACA) to project base up to 200 tenant based vouchers. On December 25, 2016, HACA issued a Request for Proposal soliciting proposals from developers/owners to provide rental units under the project-based voucher program to serve vulnerable homeless individuals with a "housing first" approach. One proposal was received from Austin Travis County Integral Care (ATCIC) requesting 25 project- based vouchers for its permanent supportive housing project, Housing First Oak Springs, located at 3000 Oak Springs, Dr, Austin, TX. The project includes 50 efficiency units complemented by a resident lounge and kitchen, courtyard, computer lab, case management offices, and a co-located community clinic and a space designated for employment services. The project will accept 25 vulnerable homeless individuals and 25 homeless veterans. The development will have on-site offices and meeting rooms to provide case management, support services and group meetings to help individuals succeed. The proposal was reviewed by Sylvia Blanco, Lisa Garcia, Ron Kowal, Judy Paciocco and Elvira Lathrop.

**Commissioner Duncan-Hall** moved to approve Resolution No. 2488: Authorizing HACA to Project-base 25 Housing Choice Vouchers to Austin/Travis County Integral Care in response to a Request for Proposals issued on December 25, 2016. **Commissioner Robinson** seconded the motion. The motion passed. (4-Ayes and 0-Nays).

**ITEM 4: Presentation, Discussion and Possible Action regarding Resolution No. 2489: Approval of the revised Housing Choice Voucher program utility allowance schedules**

Federal Regulations require housing authorities to review utility allowance schedules annually and adjust the schedules if there has been a 10% or more rate change per category since the last revision. Staff recommends adjusting the utility allowance rates

as reflected in the utility allowance schedules.

**Commissioner Duncan-Hall** moved to approve Resolution No. 2489: Approval of the revised Housing Choice Voucher program utility allowance schedules. **Commissioner Carrington** seconded the motion. The motion passed. (4-Ayes and 0-Nays).

**ITEM 5: Update and Discussion on HACA's Rental Assistance Demonstration (RAD) Modernization and Redevelopment program**

**Ann Gass**, Director of Strategic Housing Initiatives gave an update on RAD.

**THE BOARD DID NOT RECESS INTO EXECUTIVE SESSION.**

**REPORTS**

The Board accepts the following reports:

- **Michael Gerber**, HACA President reported that there may be a need for HACA and its subsidiaries to enlist a financial advisor.
- **Laura Bodai, Director of Admissions** gave an update on the Public Housing Wait List.
- **Ron Kowal, VP, Austin Affordable Housing Corporation (AAHC)** reported that AAHC was awarded the option to purchase Sterling Springs Apartments. The complex is located in South Austin and has 172 units. A tour of the property is planned for the near future as staff determines whether or not to make this purchase.
- **Michael Cummings, VP, Southwest Housing Compliance Corporation** gave a status update on SHCC.

**ADJOURNMENT**

**Commissioner Carrington** moved to adjourn the meeting. **Commissioner Duncan-Hall** seconded the motion. The Motion passed unanimously. The meeting adjourned at 1:50 p.m.

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Carl S. Richie, Jr., Chairperson

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Michael G. Gerber, Secretary

**HOUSING AUTHORITY OF THE CITY OF AUSTIN  
BOARD OF COMMISSIONERS  
REGULAR BOARD MEETING**

**AGENDA ITEM NO. 1B**

**Presentation, Discussion and Possible Action regarding  
Resolution No. 2491: Approving the Write-off of the  
uncollectible accounts of vacated tenants for the seven-  
month period ending March 31, 2017**

**HOUSING AUTHORITY OF THE CITY OF AUSTIN  
BOARD OF COMMISSIONERS**

**AGENDA ITEM NO.1B**

**Resolution No. 2491**

**MEETING DATE:** April 20th, 2017

**STAFF CONTACT:** Thomas Cherian, Chief Financial Officer

**ITEM TITLE:** Discussion and Adoption of Resolution No. 2491 Approving Write-off of the Uncollectible Accounts of Vacated Tenants as of March 31, 2017

**BUDGETED ITEM:** N/A

**TOTAL COST:** \$42,218.50

**ACTION:**

Motion to Approve Resolution No. 2491 Approving Write-off of the Uncollectible Accounts of Vacated Tenants as of March 31, 2017.

**SUMMARY:**

The regulations of the U.S. Department of Housing and Urban Development require the Commissioners of the Housing Authority of the City of Austin to approve the write-off of the uncollectible accounts of vacated tenants. The attached list represents amounts due by tenants who moved from the developments, as of March 31, 2017 and were not written off previously. The Finance Department sent notification to the former tenants by certified mail of the amounts due and informed them that they will be reported to the credit bureau. None of the tenants listed have responded. We are in the process of signing a contract with a collection agency to follow up with those moved out tenants and also make the reporting to the credit bureau.

**EXHIBITS**

Exhibit 1: List of Tenants and their amounts due by development.

**Write-off Analysis**

<b><u>Period</u></b>	<b><u>W/O Amount</u></b>	<b><u>Monthly Average</u></b>	<b><u>Monthly Average Tenant Billing</u></b>	<b><u>W/O as a percentage of Monthly Billing</u></b>
Current	\$42,218.50	\$7,036	\$366,005	1.92%
10-21-2016	\$60,180.96	\$10,030	\$418,136	2.40%
04-21-2016	\$29,077.19	\$17,576	\$412,396	4.26%
03-24-2016	\$123,295.33	\$17,614	\$405,765	4.34%
10-27-2015	\$58,546.11	\$11,709	\$388,572	3.01%
05-21-2015	\$52,312.38	\$26,156	\$388,791	6.73%
03-26-2015	\$48,909.77	\$8,152	\$367,780	2.22%
09-18-2014	\$61,831.58	\$10,305	\$357,586	2.88%
09-20-2014	\$57,132.56	\$9,522	\$347,145	2.74%
09-19-2013	\$47,318.99	\$7,886	\$338,433	2.33%
03-01-2013	\$49,988.60	\$ 8,331	\$327,679	2.54%
09-20-2012	\$ 55,241.00	\$ 9,207	\$323,068	2.85%
03-02-2012	\$ 84,140.75	\$14,023	\$305,487	4.59%



## **RESOLUTION NO. 2491**

### **WRITE-OFF OF THE UNCOLLECTIBLE ACCOUNTS OF VACATED TENANTS AS OF MARCH 31, 2017**

**WHEREAS**, the regulations of the U.S. Department of Housing and Urban Development require the Commissioners of the Public Housing Agency to approve the write-off of vacated tenants accounts designated as uncollectible, and;

**WHEREAS**, a reasonable effort has been made to collect the balance due to the Housing Authority by notifying the former tenants by certified mail of the amounts due and informing them that they will be reported to the credit bureau;

**NOW, THEREFORE BE IT RESOLVED**, by the Board of Commissioners of the Housing Authority of the City of Austin that the Chief Executive Officer is authorized to write off the amount of **FORTY TWO THOUSAND TWO HUNDRED AND EIGHTEEN DOLLARS AND 50 CENT (\$42,218.50)**, the total of the attached documentation considered to be uncollectible, from the books of the Housing Authority of the City of Austin for the fiscal year ending March 31, 2017.

**PASSED, APPROVED AND ADOPTED** this 20<sup>th</sup> day of April 2017.

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Carl S. Richie, Jr., Chairperson

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Michael Gerber, Secretary

<u>FullName</u>	<u>Entity ID</u>	<u>Unit ID</u>	<u>Move Out Date</u>	<u>Move Out Reason</u>	<u>Rent</u>	<u>Legal</u>	<u>Maintnance</u>	<u>Other</u>	<u>Utility</u>	<u>Fee</u>	<u>Current Elite Account Balance</u>
<b>Unsettled Move Out Accounts</b>											
<b>B T Washington</b>											
Tricia R Alexander	007558	005114	03/20/2017	Eviction - Non-Payment	\$251.00	\$281.00	\$615.00	\$60.00	\$0.00	\$0.00	\$1,207.00
Felicia A Gonzales	052304	005096	01/23/2017	Other - See Notes	\$0.00	\$0.00	\$927.51	\$0.00	\$0.00	\$0.00	\$927.51
Brenda G Mackson	023415	006202	10/13/2016	Other - See Notes	\$29.69	\$0.00	\$199.00	\$15.00	\$0.00	\$0.00	\$243.69
Jesus S Sanchez-Cama	174912	006137	11/10/2016	Scheduled	\$8.00	\$0.00	\$322.15	\$15.00	\$9.00	\$0.00	\$354.15
Tanisha D Kennedy	054951	005083	10/03/2016	Scheduled	\$0.00	\$0.00	\$177.05	\$0.00	\$0.00	\$0.00	\$177.05
Maria De La Luz Revelo	052589	005025	03/01/2017	Scheduled	\$0.00	\$0.00	\$323.98	\$9,081.00	\$0.00	\$0.00	\$9,404.98
Maria E Martinez-Gamo	057613	005064	12/28/2016	Scheduled	\$0.00	\$0.00	\$280.14	\$0.00	\$0.00	\$0.00	\$280.14
Sameka Inez Roberts	039719	005102	11/15/2016	Eviction - Non-Payment	\$324.00	\$281.00	\$275.85	\$44.00	\$0.00	\$30.00	\$954.85
<b>Total for B T Washington Project Number 005 :</b>					<b>\$612.69</b>	<b>\$562.00</b>	<b>\$3,120.68</b>	<b>\$9,215.00</b>	<b>\$9.00</b>	<b>\$30.00</b>	<b>\$13,549.37</b>
<b>Chalmers Courts</b>											
Genoveva M Trevino	025134	001082	02/28/2017	Illness	\$184.00	\$0.00	\$0.00	\$32.00	\$0.00	\$0.00	\$216.00
Monica D Puentes	022717	001084	11/07/2016	Eviction - Lease Non-Compli	\$0.00	\$908.90	\$1,213.63	\$0.00	\$28.00	\$0.00	\$2,150.53
Maria A De La Garza	003877	001147	12/09/2016	Scheduled	\$0.00	\$0.00	\$395.50	\$0.00	\$0.00	\$0.00	\$395.50
Steven Clemmons	009552	001162	08/11/2015	Eviction - Criminal Activity	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Maria E Almeida	035185	001128	02/22/2017	Deceased	\$10.00	\$0.00	\$0.00	\$96.00	\$0.00	\$0.00	\$106.00
Sanjuana Vega-Contrei	036901	001055	09/26/2016	Scheduled	\$0.00	\$0.00	\$394.85	\$0.00	\$0.00	\$0.00	\$394.85
Whitney M Maxwell	101059	001029	10/26/2016	Deceased	\$117.00	\$0.00	\$883.30	\$30.00	\$17.00	\$0.00	\$1,047.30
Ardetra R Lewis	103257	001134	10/26/2016	Eviction - Criminal Activity	\$2,034.85	\$1,386.15	\$1,795.93	\$572.00	\$18.00	\$0.00	\$5,806.93
<b>Total for Chalmers Courts Project Number 001 :</b>					<b>\$2,345.85</b>	<b>\$2,295.05</b>	<b>\$4,683.21</b>	<b>\$730.00</b>	<b>\$63.00</b>	<b>\$0.00</b>	<b>\$10,117.11</b>
<b>Gaston Place Apartments</b>											
Elleyn D Quarrie	057671	009026	02/15/2017	Illness	\$0.00	\$0.00	\$0.90	\$14.50	\$0.00	\$0.00	\$15.40
Marcus J Rucker	107677	009076	03/15/2017	Eviction - Non-Payment	\$458.00	\$281.00	\$537.00	\$139.30	\$35.40	\$0.00	\$1,450.70
<b>Total for Gaston Place Apartments Project Number 009 :</b>					<b>\$458.00</b>	<b>\$281.00</b>	<b>\$537.90</b>	<b>\$153.80</b>	<b>\$35.40</b>	<b>\$0.00</b>	<b>\$1,466.10</b>
<b>Goodrich Place</b>											
Tracey S Velazquez	056385	013162	02/21/2017	Scheduled	\$382.00	\$0.00	\$0.00	\$15.00	\$0.00	\$0.00	\$397.00
<b>Total for Goodrich Place Project Number 013 :</b>					<b>\$382.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$15.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$397.00</b>
<b>Lakeside Apartments</b>											
Lester V Ealey	034614	007027	12/20/2016	Deceased	\$35.00	\$0.00	\$0.00	\$33.50	\$0.00	\$0.00	\$68.50
Luke Carter Jr	019082	007029	02/09/2017	Involuntary/Termination	\$0.00	\$46.50	\$813.50	\$19.50	\$0.00	\$0.00	\$879.50
Patsy A Wright	016587	007011	10/17/2016	Deceased	\$0.00	\$0.00	\$0.00	\$2.00	\$0.00	\$0.00	\$2.00
Khoan T Nguyen	016017	007090	01/18/2017	Scheduled	\$1.00	\$0.00	\$0.00	\$22.00	\$0.00	\$0.00	\$23.00
Bahjat Faraj	106491	007052	12/13/2016	Involuntary/Termination	\$137.00	\$0.00	\$0.00	\$31.50	\$0.00	\$0.00	\$168.50
David Stephenson, Jr.	028871	007003	11/08/2016	Eviction - Non-Payment	\$611.00	\$281.00	\$0.00	\$101.00	\$0.00	\$0.00	\$993.00
Annie D Griffin	055535	007035	11/08/2016	Eviction - Non-Payment	\$751.25	\$281.00	\$0.00	\$96.00	\$0.00	\$0.00	\$1,128.25
Theodore Samuel	107414	007144	10/17/2016	Involuntary/Termination	\$249.00	\$0.00	\$0.00	\$70.00	\$0.00	\$0.00	\$319.00
Darryl E Hamilton	108132	007090	03/06/2017	Scheduled	\$55.00	\$0.00	\$0.00	\$2.00	\$0.00	\$0.00	\$57.00
<b>Total for Lakeside Apartments Project Number 007 :</b>					<b>\$1,839.25</b>	<b>\$608.50</b>	<b>\$813.50</b>	<b>\$377.50</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$3,638.75</b>

<u>FullName</u>	<u>Entity ID</u>	<u>Unit ID</u>	<u>Move Out Date</u>	<u>Move Out Reason</u>	<u>Rent</u>	<u>Legal</u>	<u>Maintnance</u>	<u>Other</u>	<u>Utility</u>	<u>Fee</u>	<u>Current Elite Account Balance</u>
<b>Meadowbrook</b>											
Maria G Lopez-Montoya	055355	004079	01/17/2017	RAD/PBRA Conversion	\$206.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	<b>\$206.00</b>
Mack Rigelton Jr	045680	004001	11/30/2016	Scheduled	\$290.00	\$0.00	\$170.06	\$15.00	\$9.00	\$0.00	<b>\$484.06</b>
Shequita R Anderson	052675	004113	12/27/2016	Scheduled	\$0.00	\$0.00	\$33.79	\$0.00	\$0.00	\$0.00	<b>\$33.79</b>
Madalena R Cruz	052017	004109	09/29/2016	Eviction - Non-Payment	\$1,283.00	\$281.00	\$314.40	\$45.00	\$0.00	\$0.00	<b>\$1,923.40</b>
Brittany D Johnson	054249	004048	12/20/2016	Moved to Section 8	\$0.00	\$0.00	\$270.80	\$0.00	\$0.00	\$0.00	<b>\$270.80</b>
Katrice T Shelton	055938	004028	02/28/2017	Scheduled	\$0.00	\$0.00	\$362.05	\$0.00	\$0.00	\$0.00	<b>\$362.05</b>
Rosa E Colococho	043964	004058	01/16/2017	RAD/PBRA Conversion	\$307.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	<b>\$307.00</b>
Jessica F Rivera	102475	004037	10/12/2016	Eviction - Non-Payment	\$0.00	\$281.00	\$319.35	\$31.28	\$0.00	\$0.00	<b>\$631.63</b>
Jessica Ramirez	116005	004003	11/29/2016	Eviction - Non-Payment	\$9.00	\$281.00	\$412.64	\$75.00	\$0.00	\$0.00	<b>\$777.64</b>
Christopher Rodriguez	111313	004005	01/31/2017	Scheduled	\$0.00	\$0.00	\$1,547.14	\$0.00	\$0.00	\$0.00	<b>\$1,547.14</b>
<b>Total for Meadowbrook Project Number 004 :</b>					<b>\$2,095.00</b>	<b>\$843.00</b>	<b>\$3,430.23</b>	<b>\$166.28</b>	<b>\$9.00</b>	<b>\$0.00</b>	<b>\$6,543.51</b>
<b>Rosewood Courts</b>											
Tracy D Lavan	041624	002130	10/17/2016	Eviction - One-Strike (Non-D	\$0.00	\$0.00	\$376.10	\$0.00	\$0.00	\$0.00	<b>\$376.10</b>
Louise Lemuel	043543	002039	02/07/2017	Scheduled	\$0.00	\$0.00	\$240.00	\$0.00	\$0.00	\$0.00	<b>\$240.00</b>
Alexandra Alvarez	057536	002061	02/21/2017	Scheduled	\$0.00	\$0.00	\$101.99	\$0.00	\$0.00	\$0.00	<b>\$101.99</b>
Daniel R Anthony	103944	002006	11/15/2016	Eviction - One-Strike (Non-D	\$578.00	\$281.00	\$267.50	\$75.00	\$31.15	\$0.00	<b>\$1,232.65</b>
<b>Total for Rosewood Courts Project Number 002 :</b>					<b>\$578.00</b>	<b>\$281.00</b>	<b>\$985.59</b>	<b>\$75.00</b>	<b>\$31.15</b>	<b>\$0.00</b>	<b>\$1,950.74</b>
<b>Santa Rita Courts</b>											
Christina A Contreras	108637	003081	01/09/2017	Deceased	\$260.00	\$0.00	\$105.00	\$30.00	\$0.00	\$0.00	<b>\$395.00</b>
Natalie N Ifeanacho	009720	003075	01/09/2017	Deceased	\$0.00	\$0.00	\$20.00	\$0.00	\$0.00	\$0.00	<b>\$20.00</b>
Latoria S Bible	048908	003078	02/16/2017	Scheduled	\$0.00	\$0.00	\$572.75	\$0.00	\$0.00	\$0.00	<b>\$572.75</b>
Maria C Torres Regalad	107695	003045	12/05/2016	Scheduled	\$0.00	\$0.00	\$783.44	\$0.00	\$0.00	\$0.00	<b>\$783.44</b>
<b>Total for Santa Rita Courts Project Number 003 :</b>					<b>\$260.00</b>	<b>\$0.00</b>	<b>\$1,481.19</b>	<b>\$30.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$1,771.19</b>
<b>Scattered Sites AMP 16</b>											
Jose Olivarez	005034	027013	11/30/2016	Scheduled	\$0.00	\$0.00	\$275.00	\$0.00	\$0.00	\$0.00	<b>\$275.00</b>
<b>Total for Scattered Sites AMP 16 Project Number 027 :</b>					<b>\$0.00</b>	<b>\$0.00</b>	<b>\$275.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$275.00</b>
<b>Scattered Sites AMP 17</b>											
Richard M Rendon Jr	045009	027007	02/21/2017	Deceased	\$42.00	\$0.00	\$120.75	\$15.00	\$0.00	\$0.00	<b>\$177.75</b>
<b>Total for Scattered Sites AMP 17 Project Number 029 :</b>					<b>\$42.00</b>	<b>\$0.00</b>	<b>\$120.75</b>	<b>\$15.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$177.75</b>

<u>FullName</u>	<u>Entity ID</u>	<u>Unit ID</u>	<u>Move Out Date</u>	<u>Move Out Reason</u>	<u>Rent</u>	<u>Legal</u>	<u>Maintnance</u>	<u>Other</u>	<u>Utility</u>	<u>Fee</u>	<u>Current Elite Account Balance</u>
<b>Thurmond Heights Apartments</b>											
Ashley K Armstrong	041557	011107	11/07/2016	Eviction - Non-Payment	\$314.00	\$281.00	\$636.88	\$0.00	\$0.00	\$0.00	\$1,231.88
James G Chestnut	057519	011121	12/12/2016	Eviction - Non-Payment	\$293.00	\$0.00	\$0.00	\$45.00	\$0.00	\$0.00	\$338.00
<b>Total for Thurmond Heights Apartments Project Number 011 :</b>					<b>\$607.00</b>	<b>\$281.00</b>	<b>\$636.88</b>	<b>\$45.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$1,569.88</b>
<b>Bouldin Oaks</b>											
Gilbert Gonzales	5133	10136	11/24/2016	Illness	\$217.00	\$0.00	\$294.90	\$30.00	\$0.00	\$0.00	\$541.90
Tralon N Hopkins	33666	10060	11/14/2016	Section 8	\$0.00	\$0.00	\$220.20	\$0.00	\$0.00	\$0.00	\$220.20
<b>Total for Bouldin Oaks Project Number</b>					<b>\$217.00</b>	<b>\$0.00</b>	<b>\$515.10</b>	<b>\$30.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$762.10</b>
<b>Total Bouldin Oaks</b>					<b>\$217.00</b>	<b>\$0.00</b>	<b>\$515.10</b>	<b>\$30.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$762.10</b>
<b>Grand Total for all Developments</b>					<b>\$9,436.79</b>	<b>\$5,151.55</b>	<b>\$16,600.03</b>	<b>\$10,852.58</b>	<b>\$147.55</b>	<b>\$30.00</b>	<b>\$42,218.50</b>

**HOUSING AUTHORITY OF THE CITY OF AUSTIN  
BOARD OF COMMISSIONERS  
REGULAR BOARD MEETING**

**AGENDA ITEM NO. 1C**

**Presentation, Discussion and Possible Action on Resolution  
No. 2493: Approval of the Public Housing Utility  
Allowances and Flat Rents**

**HOUSING AUTHORITY OF THE CITY OF AUSTIN**  
**BOARD ACTION REQUEST**  
**RESOLUTION NO. 2493**  
**HOUSING & COMMUNITY DEVELOPMENT DEPARTMENT**

**MEETING DATE:** April 20, 2017

**STAFF CONTACT:** Pilar Sanchez, Vice President of HCD

**ITEM TITLE:** Discussion and Adoption of Resolution No. 2493: Approval of the Public Housing Utility Allowances and Flat Rents

**BUDGETED ITEM:** NA

**TOTAL COST:** Not Applicable

**ACTION**

Motion to approve Resolution No. 2493: Authorizing the Housing Authority of the City of Austin to update the utility allowances for our remaining Public Housing properties. As a result of the updated utility allowances, this motion also authorizes the update of the Flat Rents for Public Housing properties.

**SUMMARY**

*General Information:* HACA has the responsibility to conduct a regular review of utility costs and update the utility allowances accordingly. HACA contracted with Facility Strategies Group, LLC (FSG) to conduct this study. After going through review and revisions of this study, HACA is presenting the updated utility allowances as identified by FSG. The result is a decrease in the utility allowances across all properties except for scattered sites. A separate study conducted with Austin Energy that reviewed 100% of actual utility costs at these properties provided very similar results. As a result, staff believes that this decrease is a true reflection of actual costs.

As a result of the change in utility allowance, HACA is required to update the flat rent schedule. PIH Notice 2014-12 states that when a flat rent family pays utility costs directly to the utility provider, the flat rent must be adjusted downward by the amount of the utility allowance. This maintains equal treatment of flat rent families that pay utilities and flat rent families that don't pay any utilities.

*Organizational Structure:* The proposed changes will only affect residents living in properties that are still in the Conventional Public Housing program. If approved, they will go into effect on May 1, 2017. The RAD Project Based Rental Assistance properties will undergo a different utility allowance review.

*Public Comment:* The notice of these proposed changes was publicly posted and sent to both Legal Aide and the Austin Tenants' Council on March 1, 2017. The public comment period was 30 days and ended at 5:00 pm on March 31, 2017. No comments were received.

**EXHIBITS**

Exhibit 1: Updated Utility Allowance Schedule

Exhibit 2: Updated Flat Rent Schedule

**Housing Authority of the City of Austin  
Monthly Utility Allowances Comparison  
2017-18 Tenant Purchased Utilities  
Effective May 1, 2017**

**TX 001: CHALMERS COURTS**

Electricity-Individual Unit Meters (HACA pays for gas and water)

Bedroom Size	0 BR	1 BR	2BR	3 BR	4 BR	5 BR
2016 UA	NA	\$56	\$59	\$63	\$66	NA
2017 UA	NA	\$46	\$49	\$52	\$55	NA
Difference	NA	-\$10	-\$10	-\$11	-\$11	NA

**TX 002 – ROSEWOOD COURTS**

Electricity-Individual Unit Meters (HACA pays for gas and water)

Bedroom Size	0 BR	1 BR	2BR	3 BR	4 BR	5 BR
2016 UA	\$55	\$56	\$59	\$62	\$65	NA
2017 UA	\$46	\$47	\$50	\$53	\$56	NA
Difference	-\$9	-\$9	-\$9	-\$9	-\$9	NA

**TX 003 – SANTA RITA COURTS**

Electricity-Individual Unit Meters (HACA pays for gas and water)

Bedroom Size	0 BR	1 BR	2BR	3 BR	4 BR	5 BR
2016 UA	NA	\$55	\$58	\$61	\$64	\$70
2017 UA	NA	\$47	\$50	\$53	\$56	\$62
Difference	NA	-\$8	-\$8	-\$8	-\$8	-\$8

**TX 004: MEADOWBROOK APARTMENTS**

Electricity-Individual Unit Meters (HACA pays for gas and water)

Bedroom Size	0 BR	1 BR	2BR	3 BR	4 BR	5 BR
2016 UA	NA	NA	\$62	\$65	\$65	\$81
2017 UA	NA	NA	\$49	\$52	\$51	\$63
Difference	NA	NA	-\$13	-\$13	-\$14	-\$18

**TX 005: BOOKER T WASHINGTON TERRACES**

Electricity-Individual Unit Meters (HACA pays for gas and water)

Bedroom Size	0 BR	1 BR	2BR	3 BR	4 BR	5 BR
2016 UA	NA	\$49	\$57	\$61	\$71	\$81
2017 UA	NA	\$41	\$48	\$52	\$62	\$71
Difference	NA	-\$8	-\$9	-\$9	-\$9	-\$10

**TX 007 – LAKESIDE APARTMENTS****TX 008 – SALINA APARTMENTS**

All Bedroom Sizes	2016 Charge	2017Charge	Difference
Lakeside Apartments	\$11	\$15	\$4
Salina Apartments	\$12	\$9	-\$3

**TX 009-GASTON PLACE APARTMENTS**

Bedroom Size	0 BR	1 BR	2BR	3 BR	4 BR	5 BR
2016	-	348 KWH	408 KWH	-	-	-
2017	-	240 KWH	270 KWH	-	-	-
Difference	-	-108 KWH	-138 KWH	-	-	-

**TX 011: THURMOND HEIGHTS APARTMENTS**

Electricity-Individual Unit Meters (HACA pays for gas and water)

Bedroom Size	0 BR	1 BR	2BR	3 BR	4 BR	5 BR
2016 UA	NA	\$55	\$56	\$63	\$68	NA
2017 UA	NA	\$45	\$46	\$54	\$58	NA
Difference	NA	-\$10	-\$10	-\$9	-\$10	NA

**TX 013: GOODRICH APARTMENTS**

Electricity-Individual Unit Meters (HACA pays for gas and water)

Bedroom Size	0 BR	1 BR	2BR	3 BR	4 BR	5 BR
2016 UA	NA	\$54	\$57	\$60	\$63	NA
2017 UA	NA	\$45	\$48	\$51	\$54	NA
Difference	NA	-\$9	-\$9	-\$9	-\$9	NA

**TX 27/28/29 SCATTERED SITES**

Bedroom Size	0 BR	1 BR	2BR	3 BR	4 BR	5 BR
2016 UA	NA	NA	\$157	\$187	\$220	NA
2017 UA	NA	NA	\$184	\$216	\$254	NA
Difference	NA	NA	\$27	\$29	\$34	NA



**HACA Flat Rent Schedule for all Public Housing Units**  
**Effective May 1, 2017**

**Family Sites:**

TX#	Property	Efficiency		1 Bedroom		2 Bedroom		3 Bedroom		4 Bedroom		5 Bedroom	
		Flat Rent eff. 1/1/17	Flat Rent eff. 5/1/17	Flat Rent eff. 1/1/17	Flat Rent eff. 5/1/17	Flat Rent eff. 1/1/17	Flat Rent eff. 5/1/17	Flat Rent eff. 1/1/17	Flat Rent eff. 5/1/17	Flat Rent eff. 1/1/17	Flat Rent eff. 5/1/17	Flat Rent eff. 1/1/17	Flat Rent eff. 5/1/17
1	Chalmers	N/A	N/A	\$684	\$694	\$859	\$869	\$1,178	\$1,189	\$1,430	\$1,441	N/A	N/A
2	Rosewood	\$557	\$566	\$684	\$693	\$859	\$868	\$1,179	\$1,188	\$1,431	\$1,440	N/A	N/A
3	Santa Rita	N/A	N/A	\$685	\$699	\$860	\$868	\$1,180	\$1,188	\$1,432	\$1,440	\$1,650	\$1,658
4	Meadowbrook	N/A	N/A	N/A	\$693	\$958	\$971	\$1,321	\$1,334	\$1,601	\$1,615	\$1,835	\$1,853
5	BTW	N/A	N/A	\$691	\$699	\$861	\$870	\$1,180	\$1,189	\$1,425	\$1,434	\$1,639	\$1,649
11	Thurmond Heights	N/A	N/A	\$702	\$712	\$879	\$889	\$1,204	\$1,213	\$1,454	\$1,464	N/A	N/A
13	Goodrich Place	N/A	N/A	\$771	\$780	\$963	\$972	\$1,326	\$1,335	\$1,603	\$1,612	N/A	N/A
		\$	%	\$	%	\$	%	\$	%	\$	%	\$	%
Average Change		\$9	2%	\$10	1%	\$10	1%	\$10	1%	\$10	1%	\$12	1%

**Mixed Population Properties (Elderly & Disabled Residents):**

TX#	Property	Efficiency		1 Bedroom		2 Bedroom	
		Flat Rent eff. 1/1/17	Flat Rent eff. 5/1/17	Flat Rent eff. 1/1/17	Flat Rent eff. 5/1/17	Flat Rent eff. 1/1/17	Flat Rent eff. 5/1/17
7	Lakeside	\$1,020	\$1,020	\$1,233	\$1,233	\$1,522	\$1,522
8	Salina	\$612	\$612	\$740	\$740	N/A	N/A
9	Gaston Place	N/A	N/A	\$706	\$706	\$867	\$867
		\$	%	\$	%	\$	%
Average Change		\$0	0%	\$0	0%	\$0	0%

**HACA Flat Rent Schedule for Scattered Sites**  
**Effective May 1, 2017**

<b>TX27 / 28/2 9</b>	<b>Address</b>	<b>Street</b>	<b>Bed Rooms</b>	<b><i>Flat Rent eff. 1/1/17</i></b>	<b><i>Flat Rent eff. 5/1/17</i></b>
1	5506	Shreveport Dr	3	<b><i>\$1,335</i></b>	<b><i>\$1,306</i></b>
2	5604	Shreveport Dr	3	<b><i>\$1,335</i></b>	<b><i>\$1,306</i></b>
3	5912	Green Acres	3	<b><i>\$1,335</i></b>	<b><i>\$1,306</i></b>
4	5919	Green Acres	2	<b><i>\$965</i></b>	<b><i>\$938</i></b>
5	5916	Richard Carlton Blvd	2	<b><i>\$965</i></b>	<b><i>\$938</i></b>
6	6104	Waycross Dr	3	<b><i>\$1,233</i></b>	<b><i>\$1,204</i></b>
7	6515	Starstreak Dr	3	<b><i>\$1,233</i></b>	<b><i>\$1,204</i></b>
8	6701	Shannon Dr	3	<b><i>\$1,148</i></b>	<b><i>\$1,119</i></b>
9	6713	Shannon Dr	3	<b><i>\$1,148</i></b>	<b><i>\$1,119</i></b>
10	6805	Shannon Dr	3	<b><i>\$1,148</i></b>	<b><i>\$1,119</i></b>
11	7104	Shannon Dr	4	<b><i>\$1,387</i></b>	<b><i>\$1,353</i></b>
12	7012	Hillcroft Dr	3	<b><i>\$1,148</i></b>	<b><i>\$1,119</i></b>
13	7021	Hillcroft Dr	3	<b><i>\$1,148</i></b>	<b><i>\$1,119</i></b>
14	12405	Turtleback Ln	3	<b><i>\$1,335</i></b>	<b><i>\$1,306</i></b>
15	12721	Magnolia Mound Trl	2	<b><i>\$965</i></b>	<b><i>\$938</i></b>
16	12815	Magnolia Mound Trl	3	<b><i>\$1,335</i></b>	<b><i>\$1,306</i></b>
17	12817	Magnolia Mound Trl	3	<b><i>\$1,335</i></b>	<b><i>\$1,306</i></b>
18	12821	Meehan Dr	3	<b><i>\$1,335</i></b>	<b><i>\$1,306</i></b>
19	12902	Lazyfield Trl	3	<b><i>\$1,335</i></b>	<b><i>\$1,306</i></b>
20	12906	Odie Ln	3	<b><i>\$1,335</i></b>	<b><i>\$1,306</i></b>
21	12915	Garfield Ln	4	<b><i>\$1,608</i></b>	<b><i>\$1,574</i></b>
22	13004	Garfield Ln	4	<b><i>\$1,608</i></b>	<b><i>\$1,574</i></b>

**RESOLUTION NO. 2493**

**Approval of the Public Housing Utility Allowances and Flat Rents**

**WHEREAS**, the Housing Authority of the City of Austin (HACA) has the responsibility to regularly review and update the utility allowance schedule for the Public Housing program; and

**WHEREAS**, HACA contracted with Facility Strategies Group, LLC (FSG) to conduct the review and received their proposed utility allowance schedule; and

**WHEREAS**, pursuant to to Section 3 of Notice PIH 2014-12, if a family paying flat rent is responsible for making direct utility payments to the utility company, the PHA must adjust the flat rent amount downward, using a utility allowance, to account for reasonable utility costs; and

**WHEREAS**, changes to the utility allowance affects the calculation of the flat rents for each property, leading HACA to propose the updated flat rent schedule for the Public Housing properties; and

**WHEREAS**, HACA provided a 30 day public comment period for both the utility allowance and flat rent schedules beginning on March 1, 2017 through March 31, 2017 with no public comments received;

**Now, therefore, it is hereby**

**RESOLVED**, that the Housing Authority of the City of Austin Board of Commissioners approves and adopts the proposed utility allowance schedule and flat rent schedule for the Public Housing properties to be effective on May 1, 2017.

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**Michael G. Gerber, Secretary**

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**Carl S. Richie, Jr., Chairperson**

**HOUSING AUTHORITY OF THE CITY OF AUSTIN  
BOARD OF COMMISSIONERS  
REGULAR BOARD MEETING**

**AGENDA ITEM NO. 1D**

**Presentation, Discussion and Possible Action on Resolution  
No. 2494: Approval of the Affirmative Fair Housing  
Marketing Plans for Gaston Place, Booker T. Washington,  
Meadowbrook and Thurmond Heights**

**HOUSING AUTHORITY OF THE CITY OF AUSTIN**

**BOARD ACTION REQUEST**

**RESOLUTION NO. 2494**

**HOUSING & COMMUNITY DEVELOPMENT DEPARTMENT**

**MEETING DATE:** April 20, 2017

**STAFF CONTACT:** Pilar Sanchez, Vice President of HCD

**ITEM TITLE:** Discussion and Adoption of Resolution No. 2494: Approval of the Affirmative Fair Housing Marketing Plans for Gaston Place, Booker T Washington, Meadowbrook and Thurmond Heights.

**BUDGETED ITEM:** NA

**TOTAL COST:** Not Applicable

**ACTION**

Motion to approve Resolution No. 2494: Approval of the Affirmative Fair Housing Marketing Plans for Gaston Place, Booker T Washington, Meadowbrook and Thurmond Heights.

**SUMMARY**

*General Information:* The purpose of affirmative marketing is to ensure that individuals of similar income levels in the same housing market area have a like range of housing choices available to them regardless of their race, color, national origin, religion, sex disability or familial status (PIH Notice 2012-32). HUD requires all RAD applicants to provide proof of submission of an Affirmative Fair Housing Marketing Plan (AFHMP).

HACA conducted a review of the demographic information for each property and waiting list. This was compared to the same data points for the census tract, Travis County and the Metropolitan Statistical Area (Austin-Round Rock). Based on each comparison, HACA determined which group(s) would be less likely to apply and developed a marketing plan for each identified group. The data comparison and marketing plans are included in the attached AFHMP for each property.

HACA is responsible to follow the marketing plans for each property. However, if the waiting list for a property is closed, there is no obligation to conduct marketing during the time the list is closed.

*Organizational Structure:* HACA is committed to the letter and intent of the Fair Housing Act. HACA understands and embraces its responsibility to affirmatively further fair housing. HACA commits to exceed the requirements in order to serve populations who are diverse, of low income and of the highest need. A commitment to compliance and enforcement of the basic requirements are also extended to employment at HACA and incorporated into all aspects of our training programs.

HACA will conduct targeted marketing to the following groups for each property:

Gaston Place: White, Asian and Hispanic

Booker T Washington: White

Meadowbrook: White and Asian

Thurmond Heights: White and Hispanic

*Public Comment:* There is no public comment requirement for these plans. However, they will be reviewed by HUD and their office of Fair Housing and Equal Opportunity (FHEO).

### **EXHIBITS**

Exhibit 1: Gaston Place AFHMP

Exhibit 2: Booker T Washington AFHMP

Exhibit 3: Meadowbrook AFHMP

Exhibit 4: Thurmond Heights AFHMP

Note to all applicants/respondents: This form was developed with Nuance, the official HUD software for the creation of HUD forms. HUD has made available instructions for downloading a free installation of a Nuance reader that allows the user to fill-in and save this form in Nuance. Please see <http://portal.hud.gov/hudportal/documents/huddoc?id=nuancereaderinstall.pdf> for the instructions. Using Nuance software is the only means of completing this form.

## Affirmative Fair Housing Marketing Plan (AFHMP) - Multifamily Housing

U.S. Department of Housing  
and Urban Development  
Office of Fair Housing and Equal Opportunity

OMB Approval No. 2529-0013  
(exp.12/31/2016)

1a. Project Name & Address (including City, County, State & Zip Code)	1b. Project Contract Number	1c. No. of Units
	1d. Census Tract	
	1e. Housing/Expanded Housing Market Area	

1f. Managing Agent Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address

1g. Application/Owner/Developer Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address

### 1h. Entity Responsible for Marketing (check all that apply)

Owner      Agent      Other (specify)

Position, Name (if known), Address (including City, County, State & Zip Code), Telephone Number & Email Address

1i. To whom should approval and other correspondence concerning this AFHMP be sent? Indicate Name, Address (including City, State & Zip Code), Telephone Number & E-Mail Address.

### 2a. Affirmative Fair Housing Marketing Plan

Plan Type

Date of the First Approved AFHMP:

Reason(s) for current update:

### 2b. HUD-Approved Occupancy of the Project (check all that apply)

Elderly

Family

Mixed (Elderly/Disabled)

Disabled

### 2c. Date of Initial Occupancy

Property already occupied as part of the Public Housing program. Conversion to RAD tentatively scheduled for mid-April 2017.

### 2d. Advertising Start Date

Advertising must begin *at least* 90 days prior to initial or renewed occupancy for new construction and substantial rehabilitation projects.

Date advertising began or will begin

**For existing projects, select below the reason advertising will be used:**

To fill existing unit vacancies

To place applicants on a waiting list (which currently has individuals)

To reopen a closed waiting list (which currently has individuals)

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**3a. Demographics of Project and Housing Market Area**

Complete and submit Worksheet 1.

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**3b. Targeted Marketing Activity**

Based on your completed Worksheet 1, indicate which demographic group(s) in the housing market area is/are *least* likely to apply for the housing without special outreach efforts. (check all that apply)

White	American Indian or Alaska Native	Asian	Black or African American
Native Hawaiian or Other Pacific Islander	Hispanic or Latino	Persons with Disabilities	
Families with Children	Other ethnic group, religion, etc. (specify)		

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**4a. Residency Preference**

Is the owner requesting a residency preference? If yes, complete questions 1 through 5.

If no, proceed to Block 4b.

(1) Type

(2) Is the residency preference area:

The same as the AFHMP housing/expanded housing market area as identified in Block 1e?

The same as the residency preference area of the local PHA in whose jurisdiction the project is located?

(3) What is the geographic area for the residency preference?

(4) What is the reason for having a residency preference?

(5) How do you plan to periodically evaluate your residency preference to ensure that it is in accordance with the non-discrimination and equal opportunity requirements in 24 CFR 5.105(a)?

Complete and submit Worksheet 2 when requesting a residency preference (see also 24 CFR 5.655(c)(1)) for residency preference requirements. The requirements in 24 CFR 5.655(c)(1) will be used by HUD as guidelines for evaluating residency preferences consistent with the applicable HUD program requirements. See also HUD Occupancy Handbook (4350.3) Chapter 4, Section 4.6 for additional guidance on preferences.

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**4b. Proposed Marketing Activities: Community Contacts**

Complete and submit Worksheet 3 to describe your use of community contacts to market the project to those least likely to apply.

**4c. Proposed Marketing Activities: Methods of Advertising**

Complete and submit Worksheet 4 to describe your proposed methods of advertising that will be used to market to those least likely to apply. Attach copies of advertisements, radio and television scripts, Internet advertisements, websites, and brochures, etc.

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**5a. Fair Housing Poster**

The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place (24 CFR 200.620(e)). Check below all locations where the Poster will be displayed.

Rental Office	Real Estate Office	Model Unit	Other (specify)
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**5b. Affirmative Fair Housing Marketing Plan**

The AFHMP must be available for public inspection at the sales or rental office (24 CFR 200.625). Check below all locations where the AFHMP will be made available.

Rental Office	Real Estate Office	Model Unit	Other (specify)
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**5c. Project Site Sign**

Project Site Signs, if any, must display in a conspicuous position the HUD approved Equal Housing Opportunity logo, slogan, or statement (24 CFR 200.620(f)). Check below all locations where the Project Site Sign will be displayed. Please submit photos of Project signs.

Rental Office	Real Estate Office	Model Unit	Entrance to Project	Other (specify)
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The size of the Project Site Sign will be                      x

The Equal Housing Opportunity logo or slogan or statement will be                      x

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**6. Evaluation of Marketing Activities**

Explain the evaluation process you will use to determine whether your marketing activities have been successful in attracting individuals least likely to apply, how often you will make this determination, and how you will make decisions about future marketing based on the evaluation process.

**7a. Marketing Staff**

What staff positions are/will be responsible for affirmative marketing?

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**7b. Staff Training and Assessment: AFHMP**

- (1) Has staff been trained on the AFHMP?
- (2) Has staff been instructed in writing and orally on non-discrimination and fair housing policies as required by 24 CFR 200.620(c)?
- (3) If yes, who provides instruction on the AFHMP and Fair Housing Act, and how frequently?
  
- (4) Do you periodically assess staff skills on the use of the AFHMP and the application of the Fair Housing Act?
- (5) If yes, how and how often?

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**7c. Tenant Selection Training/Staff**

- (1) Has staff been trained on tenant selection in accordance with the project's occupancy policy, including any residency preferences?
  
- (2) What staff positions are/will be responsible for tenant selection?

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**7d. Staff Instruction/Training:**

Describe AFHM/Fair Housing Act staff training, already provided or to be provided, to whom it was/will be provided, content of training, and the dates of past and anticipated training. Please include copies of any AFHM/Fair Housing staff training materials.

**8. Additional Considerations** Is there anything else you would like to tell us about your AFHMP to help ensure that your program is marketed to those least likely to apply for housing in your project? Please attach additional sheets, as needed.

The Housing Authority of the City of Austin (HACA) has a preference for families with a disabled head of household, spouse or co-head. During the 2015 calendar year, 68% of the names drawn off the waiting list were disabled families. During the same calendar year, 21% of the new applications received were from disabled families. The end result is that you will see a low number of disabled families on our waiting list (4.8%), however we do not feel this group is in the "least likely to apply" category.

HACA is committed to fulfill both the letter and the intent of the Fair Housing Act. HACA understands and embraces its responsibility to affirmatively further fair housing. HACA commits to exceed the requirements of this marketing plan in order to serve populations in Austin and Central Texas who are diverse, of low income, and of the highest needs. A commitment to compliance and enforcement of the basic requirements are also extended to employment within HACA are incorporated into all aspects of our training programs.

**9. Review and Update**

By signing this form, the applicant/respondent agrees to implement its AFHMP, and to review and update its AFHMP in accordance with the instructions to item 9 of this form in order to ensure continued compliance with HUD's Affirmative Fair Housing Marketing Regulations (see 24 CFR Part 200, Subpart M). 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. (See 18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Signature of person submitting this Plan & Date of Submission (mm/dd/yyyy)

12/07/2016

Name (type or print)

Michael Gerber

Title & Name of Company

President & CEO, Housing Authority of the City of Austin

**For HUD-Office of Housing Use Only**

Reviewing Official:

**For HUD-Office of Fair Housing and Equal Opportunity Use Only**

☐ Approval

☐ Disapproval

Signature & Date (mm/dd/yyyy)

Signature & Date (mm/dd/yyyy)

Name  
(type  
or  
print)

Title

Name  
(type  
or  
print)

Title

Public reporting burden for this collection of information is estimated to average six (6) hours per initial response, and four (4) hours for updated plans, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget (OMB) control number.

**Purpose of Form:** All applicants for participation in FHA subsidized and unsubsidized multifamily housing programs with five or more units (see 24 CFR 200.615) must complete this Affirmative Fair Housing Marketing Plan (AFHMP) form as specified in 24 CFR 200.625, and in accordance with the requirements in 24 CFR 200.620. The purpose of this AFHMP is to help applicants offer equal housing opportunities regardless of race, color, national origin, religion, sex, familial status, or disability. The AFHMP helps owners/agents (respondents) effectively market the availability of housing opportunities to individuals of both minority and non-minority groups that are least likely to apply for occupancy. Affirmative fair housing marketing and planning should be part of all new construction, substantial rehabilitation, and existing project marketing and advertising activities.

An AFHM program, as specified in this Plan, shall be in effect for each multifamily project throughout the life of the mortgage (24 CFR 200.620(a)). The AFHMP, once approved by HUD, must be made available for public inspection at the sales or rental offices of the respondent (24 CFR 200.625) and may not be revised without HUD approval. This form contains no questions of a confidential nature.

**Applicability:** The form and worksheets must be completed and submitted by all FHA subsidized and unsubsidized multifamily housing program applicants.

#### **INSTRUCTIONS:**

**Send completed form and worksheets to your local HUD Office, Attention: Director, Office of Housing**

#### **Part 1: Applicant/Respondent and Project**

**Identification.** Blocks 1a, 1b, 1c, 1g, 1h, and 1i are self-explanatory.

Block 1d- Respondents may obtain the Census tract number from the U.S. Census Bureau (<http://factfinder2.census.gov/main.html>) when completing Worksheet One.

Block 1e- Respondents should identify both the housing market area and the expanded housing market area for their multifamily housing projects. Use abbreviations if necessary. A **housing market area** is the area from which a multifamily housing project owner/agent may reasonably expect to draw a substantial number of its tenants. This could be a county or Metropolitan Division. The U.S. Census Bureau provides a range of levels to draw from.

An **expanded housing market area** is a larger geographic area, such as a Metropolitan Division or a Metropolitan Statistical Area, which may provide additional demographic diversity in terms of race, color, national origin, religion, sex, familial status, or disability.

Block 1f- The applicant should complete this block only if a Managing Agent (the agent cannot be the applicant) is implementing the AFHMP.

#### **Part 2: Type of AFHMP**

Block 2a- Respondents should indicate the status of the AFHMP, i.e., initial or updated, as well as the date of the first approved AFHMP. Respondents should also provide the reason (s) for the current update, whether the update is based on the five-year review or due to significant changes in project or local demographics (See instructions for Part 9).

Block 2b- Respondents should identify all groups HUD has approved for occupancy in the subject project, in accordance with the contract, grant, etc.

Block 2c- Respondents should specify the date the project was/will be first occupied.

Block 2d- For new construction and substantial rehabilitation projects, advertising must begin at least 90 days prior to initial occupancy. In the case of existing projects, respondents should indicate whether the advertising will be used to fill existing vacancies, to place individuals on the project's waiting list, or to re-open a closed waiting list. Please indicate how many people are on the waiting list when advertising begins.

### **Part 3 Demographics and Marketing Area.**

"Least likely to apply" means that there is an identifiable presence of a specific demographic group in the housing market area, but members of that group are not likely to apply for the housing without targeted outreach, including marketing materials in other languages for limited English proficient individuals, and alternative formats for persons with disabilities. Reasons for not applying may include, but are not limited to, insufficient information about housing opportunities, language barriers, or transportation impediments.

Block 3a - Using Worksheet 1, the respondent should indicate the demographic composition of the project's residents, current project applicant data, census tract, housing market area, and expanded housing market area. The applicable housing market area and expanded housing market area should be indicated in Block 1e. Compare groups within rows/across columns on Worksheet 1 to identify any under-represented group(s) relative to the surrounding housing market area and expanded housing market area, i.e., those group(s) "least likely to apply" for the housing without targeted outreach and marketing. If there is a particular group or subgroup with members of a protected class that has an identifiable presence in the housing market area, but is not included in Worksheet 1, please specify under "Other."

Respondents should use the most current demographic data from the U.S. Census or another official source such as a local government planning office. Please indicate the source of your data in Part 8 of this form.

Block 3b - Using the information from the completed Worksheet 1, respondents should identify the demographic group(s) least likely to apply for the housing without special outreach efforts by checking all that apply.

### **Part 4 - Marketing Program and Residency Preference (if any).**

Block 4a - A residency preference is a preference for admission of persons who reside or work in a specified geographic area (see 24 CFR 5.655(c)(1)(ii)). Respondents should indicate whether a residency preference is being utilized, and if so, respondents should specify if it is new, revised, or continuing. If a respondent wishes to utilize a residency preference, it must state the preference area (and provide a map delineating the precise area) and state the reason for having such a preference. The respondent must ensure that the preference is in accordance with the non-discrimination and equal opportunity requirements in 24 CFR 5.105(a) (see 24 CFR 5.655(c)(1)).

Respondents should use Worksheet 2 to show how the percentage of the eligible population living or working in the residency preference area compares to that of residents of the project, project applicant data, census tract, housing market area, and expanded housing market area. The percentages would be the same as shown on completed Worksheet 1.

Block 4b - Using Worksheet 3, respondents should describe their use of community contacts to help market the project to those least likely to apply. This table should include the name of a contact person, his/her address, telephone number, previous experience working with the target population(s), the approximate date contact was/will be initiated, and the specific role the community contact will play in assisting with affirmative fair housing marketing or outreach.

Block 4c - Using Worksheet 4, respondents should describe their proposed method(s) of advertising to market to those least likely to apply. This table should identify each media option, the reason for choosing this media, and the language of the advertisement. Alternative format(s) that will be used to reach persons with disabilities, and logo(s) that will appear on the various materials (as well as their size) should be described.

**Please attach a copy of the advertising or marketing material.**

### **Part 5 – Availability of the Fair Housing Poster, AFHMP, and Project Site Sign.**

Block 5a - The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place (24 CFR 200.620(e)). Respondents should indicate all locations where the Fair Housing Poster will be displayed.

Block 5b -The AFHMP must be available for public inspection at the sales or rental office (24 CFR 200.625). Check all of the locations where the AFHMP will be available.

Block 5c -The Project Site Sign must display in a conspicuous position the HUD-approved Equal Housing Opportunity logo, slogan, or statement (24 CFR 200.620(f)). Respondents should indicate where the Project Site Sign will be displayed, as well as the size of the Sign and the size of the logo, slogan, or statement. **Please submit photographs of project site signs.**

## **Part 6 - Evaluation of Marketing Activities.**

Respondents should explain the evaluation process to be used to determine if they have been successful in attracting those individuals identified as least likely to apply. Respondents should also explain how they will make decisions about future marketing activities based on the evaluations.

## **Part 7- Marketing Staff and Training.**

Block 7a -Respondents should identify staff positions that are/will be responsible for affirmative marketing.

Block 7b - Respondents should indicate whether staff has been trained on the AFHMP and Fair Housing Act.

Please indicate who provides the training and how frequently. In addition, respondents should specify whether they periodically assess staff members' skills in using the AFHMP and in applying the Fair Housing Act. They should state how often they assess employee skills and how they conduct the assessment.

Block 7c - Respondents should indicate whether staff has been trained on tenant selection in accordance with the project's occupancy policy, including residency preferences (if any). Respondents should also identify those staff positions that are/will be responsible for tenant selection.

Block 7d - Respondents should include copies of any written materials related to staff training, and identify the dates of past and anticipated training.

## **Part 8 - Additional Considerations.**

Respondents should describe their efforts not previously mentioned that were/are planned to attract those individuals least likely to apply for the subject housing.

## **Part 9 - Review and Update.**

By signing the respondent assumes responsibility for implementing the AFHMP. Respondents must review their AFHMP every five years or when the local Community Development jurisdiction's Consolidated Plan is updated, or when there are significant changes in the demographics of the project or the local housing market area. When reviewing the plan, the respondent should consider the current demographics of the housing market area to determine if there have been demographic changes in the population in terms of race, color, national origin, religion, sex, familial status, or disability. The respondent will then determine if the population least likely to apply for the housing is still the population identified in the AFHMP, whether the advertising and publicity cited in the current AFHMP are still appropriate, or whether advertising sources should be modified or expanded. Even if the demographics of the housing market area have not changed, the respondent should determine if the outreach currently being performed is reaching those it is intended to reach as measured by project occupancy and applicant data. If not, the AFHMP should be updated. The revised AFHMP must be submitted to HUD for approval. HUD may review whether the affirmative marketing is actually being performed in accordance with the AFHMP. If based on their review, respondents determine the AFHMP does not need to be revised, they should maintain a file documenting what was reviewed, what was found as a result of the review, and why no changes were required. HUD may review this documentation.

## **Notification of Intent to Begin Marketing.**

No later than 90 days prior to the initiation of rental marketing activities, the respondent must submit notification of intent to begin marketing. The notification is required by the AFHMP Compliance Regulations (24 CFR 108.15). The Notification is submitted to the Office of Housing in the HUD Office servicing the locality in which the proposed housing will be located. Upon receipt of the Notification of Intent to Begin Marketing from the applicant, the monitoring office will review any previously approved plan and may schedule a pre-occupancy conference. Such conference will be held prior to initiation of sales/rental marketing activities. At this conference, the previously approved AFHMP will be reviewed with the applicant to determine if the plan, and/or its proposed implementation, requires modification prior to initiation of marketing in order to achieve the objectives of the AFHM regulation and the plan.

OMB approval of the AFHMP includes approval of this notification procedure as part of the AFHMP. The burden hours for such notification are included in the total designated for this AFHMP form.

**Worksheet 1: Determining Demographic Groups Least Likely to Apply for Housing Opportunities**  
**(See AFHMP, Block 3b)**

In the respective columns below, indicate the percentage of demographic groups among the project's residents, current project applicant data, census tract, housing market area, and expanded housing market area (See instructions to Block 1e). If you are a new construction or substantial rehabilitation project and do not have residents or project applicant data, only report information for census tract, housing market area, and expanded market area. The purpose of this information is to identify any under-representation of certain demographic groups in terms of race, color, national origin, religion, sex, familial status, or disability. If there is significant under-representation of any demographic group among project residents or current applicants in relation to the housing/expanded housing market area, then targeted outreach and marketing should be directed towards these individuals least likely to apply. Please indicate under-represented groups in Block 3b of the AFHMP. **Please attach maps showing both the housing market area and the expanded housing market area.**

<b>Demographic Characteristics</b>	<b>Project's Residents</b>	<b>Project's Applicant Data</b>	<b>Census Tract</b>	<b>Housing Market Area</b>	<b>Expanded Housing Market Area</b>
% White					
% Black or African American					
% Hispanic or Latino					
% Asian					
% American Indian or Alaskan Native					
% Native Hawaiian or Pacific Islander					
%Persons with Disabilities					
% Families with Children under the age of 18					
Other (specify)					

Worksheet 2: Establishing a Residency Preference Area (See AFHMP, Block 4a)

Complete this Worksheet if you wish to continue, revise, or add a residency preference, which is a preference for admission of persons who reside or work in a specified geographic area (see 24 CFR 5.655(c)(1)(ii)). If a residency preference is utilized, the preference must be in accordance with the non-discrimination and equal opportunity requirements contained in 24 CFR 5.105(a). This Worksheet will help show how the percentage of the population in the residency preference area compares to the demographics of the project's residents, applicant data, census tract, housing market area, and expanded housing market area. **Please attach a map clearly delineating the residency preference geographical area.**

<b>Demographic Characteristics</b>	<b>Project's Residents</b> (as determined in Worksheet 1)	<b>Project's Applicant Data</b> (as determined in Worksheet 1)	<b>Census Tract</b> (as determined in Worksheet 1)	<b>Housing Market Area</b> (as determined in Worksheet 1)	<b>Expanded Housing Market Area</b> (as determined in Worksheet 1)	<b>Residency Preference Area</b> (if applicable)
% White						
% Black or African American						
% Hispanic or Latino						
% Asian						
% American Indian or Alaskan Native						
% Native Hawaiian or Pacific Islander						
% Persons with Disabilities						
% Families with Children under the age of 18						
Other (specify)						



Worksheet 3: Proposed Marketing Activities –Community Contacts (See AFHMP, Block 4b)

For each targeted marketing population designated as least likely to apply in Block 3b, identify at least one community contact organization you will use to facilitate outreach to the particular population group. This could be a social service agency, religious body, advocacy group, community center, etc. State the names of contact persons, their addresses, their telephone numbers, their previous experience working with the target population, the approximate date contact was/will be initiated, and the specific role they will play in assisting with the affirmative fair housing marketing. Please attach additional pages if necessary.

Targeted Population(s)	Community Contact(s), including required information noted above.

Worksheet 4: Proposed Marketing Activities – Methods of Advertising (See AFHMP, Block 4c)

Complete the following table by identifying your targeted marketing population(s), as indicated in Block 3b, as well as the methods of advertising that will be used to market to that population. For each targeted population, state the means of advertising that you will use as applicable to that group and the reason for choosing this media. In each block, in addition to specifying the media that will be used (e.g., name of newspaper, television station, website, location of bulletin board, etc.) state any language(s) in which the material will be provided, identify any alternative format(s) to be used (e.g. Braille, large print, etc.), and specify the logo(s) (as well as size) that will appear on the various materials. Attach additional pages, if necessary, for further explanation. Please attach a copy of the advertising or marketing material.

<b>Targeted Population(s)→ Methods of Advertising ↓</b>	<b>Targeted Population: Asian</b>	<b>Targeted Population: Hispanic</b>	<b>Targeted Population: White</b>
<b>Newspaper(s)</b>			
<b>Radio Station(s)</b>			
<b>TV Station(s)</b>			
<b>Electronic Media</b>			
<b>Bulletin Boards</b>			
<b>Brochures, Notices, Flyers</b>			
<b>Other (specify)</b>			

## **ATTACHMENTS TO THE AFFIRMATIVE FAIR HOUSING MARKETING PLAN**

### **1. Housing Market Area Map (Travis County)**

AFHMP Block 3b. Targeted Marketing Activity

Worksheet 1 Determining Demographic Groups Least Likely To Apply

### **2. Expanded Housing Market Area Map (Austin – Round Rock MSA)**

AFHMP Block 3b. Targeted Marketing Activity

Worksheet 1 Determining Demographic Groups Least Likely To Apply

### **3. Least Likely To Apply Calculator**

AFHMP Block 3b. Targeted Marketing Activity

Worksheet 1 Determining Demographic Groups Least Likely To Apply

### **4. Property Sign with Equal Housing Logo**

AFHMP Block 5c. Project Site Sign

### **5. Housing Authority of the City of Austin HACA Personnel Policy**

AFHMP Block 7d. Staff Instruction / Training, 1

### **6. HACA ACOP and Tenant Selection Plan – Fair Housing**

AFHMP Block 7d. Staff Instruction / Training, 1

### **7. HACA SOP – Limited English Proficiency**

AFHMP Block 7d. Staff Instruction / Training, 2

### **8. HACA SOP - Reasonable Accommodations Procedures and Modifications**

AFHMP Block 7d. Staff Instruction / Training, 2

### **9. HACA SOP – VAWA**

AFHMP Block 7d. Staff Instruction / Training, 2

### **10. NAHRO Fair Housing Training Agenda**

AFHMP Block 7d. Staff Instruction / Training, 6

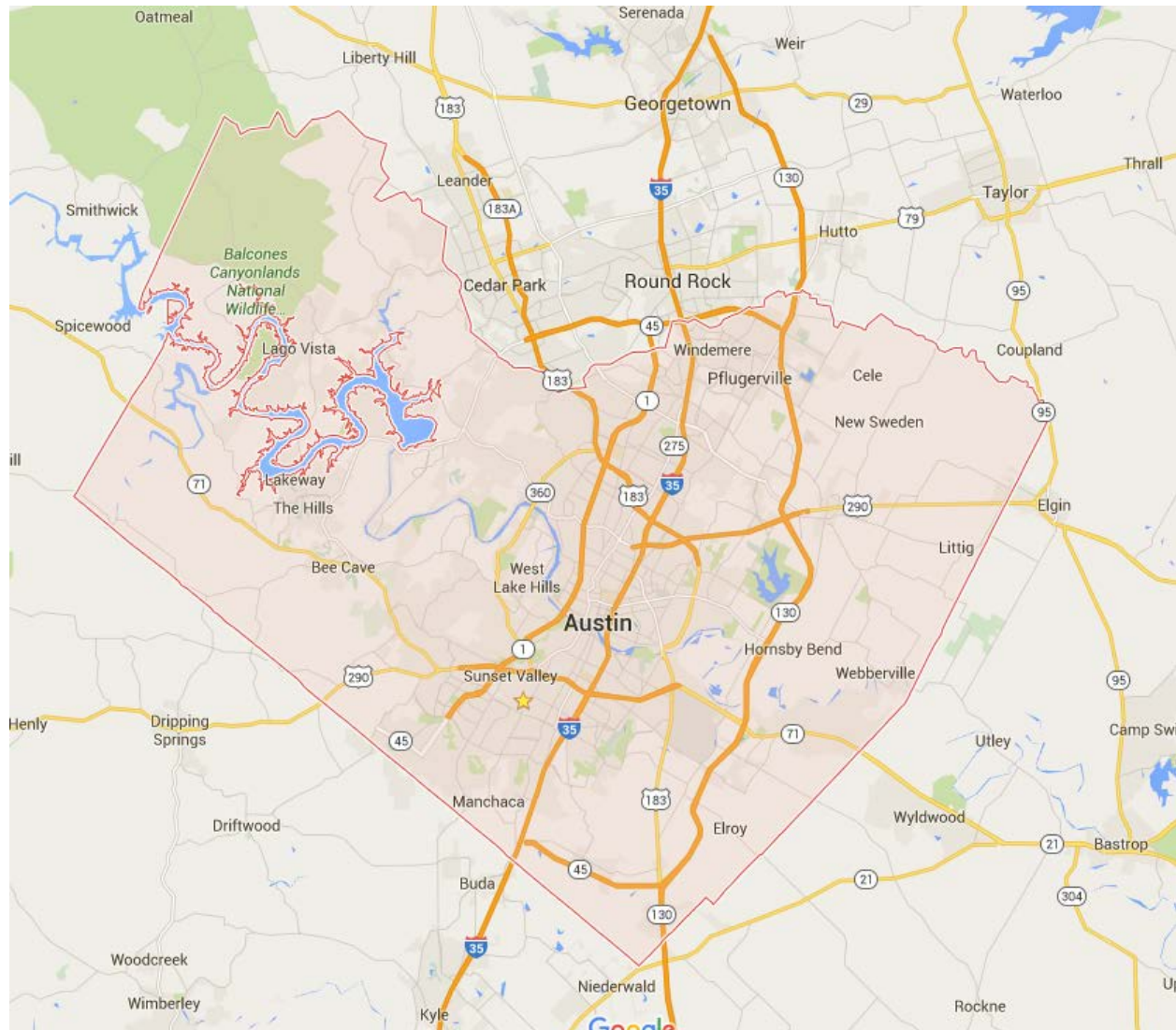
### **11. Additional Information on Community Contacts**

AFHMP Worksheet 3 Proposed Marketing Activities – Community Contacts

### **12. Brochures**

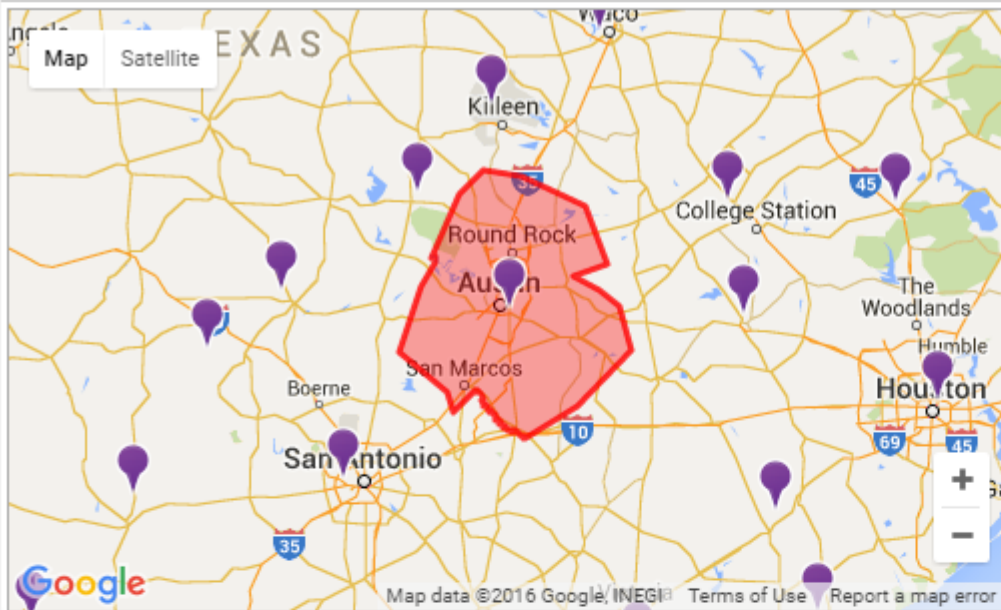
AFHMP Worksheet 4 Proposed Marketing Activities – Methods of Advertising

# Travis County Map



# Austin – Round Rock Metropolitan Statistical Area Map

Metro Areas Map View. Full data. Click icon to show name.



Show More Locations on the Map

[Census Blocks+\\*](#)  
[Census Block Groups+\\*](#)  
[Census Tracts+\\*](#)  
[Zip Codes](#)  
[School Districts](#)  
[Cities](#)  
[Counties](#)  
**Metro Areas**  
[States](#)

+ If the color of the links above is gray, please zoom in on the map to see the data.

\* Census Blocks, Census Block Groups, and Census Tracts are geo areas that are normally smaller than the size of a city. Census Blocks provide block and community level information. They are great for understanding areas within a city.

## Area Codes

## Counties

[Travis County, TX](#) 1,092,810  
[Bastrop County, TX](#) 75,708

[Williamson County, TX](#) 457,218  
[Caldwell County, TX](#) 38,870

[Hays County, TX](#) 170,410

## Cities / Towns

[Austin, TX](#) 864,218  
[Briarcliff, TX](#) 1,403  
[Cedar Creek, TX](#)  
[Creedmoor, TX](#) 187  
[Driftwood, TX](#) 84  
[Fentress, TX](#)  
[Georgetown, TX](#) 53,007  
[Hornsby Bend, TX](#) 7,355  
[Jarrell, TX](#) 899  
[Kyle, TX](#) 30,664  
[Leander, TX](#) 30,040  
[Luling, TX](#) 5,569  
[Martindale, TX](#) 1,575  
[Mc Neil, TX](#)  
[Mustang Ridge, TX](#) 1,052  
[Pflugerville, TX](#) 52,138  
[Red Rock, TX](#)  
[Round Rock, TX](#) 106,972  
[Sandoval, TX](#) 9  
[Spicewood, TX](#)  
[The Hills, TX](#) 2,533  
[Volente, TX](#) 716  
[Weir, TX](#) 610  
[Woodcreek, TX](#) 1,244

[Bastrop, TX](#) 7,469  
[Brushy Creek, TX](#) 22,537  
[Cedar Park, TX](#) 58,088  
[Dale, TX](#)  
[Dripping Springs, TX](#) 2,088  
[Florence, TX](#) 918  
[Granger, TX](#) 1,617  
[Hudson Bend, TX](#) 2,878  
[Jollyville, TX](#) 16,151  
[Lago Vista, TX](#) 6,349  
[Liberty Hill, TX](#) 1,416  
[Manchaca, TX](#) 1,448  
[Maxwell, TX](#)  
[Mcdade, TX](#) 874  
[Niederwald, TX](#) 637  
[Point Venture, TX](#) 791  
[Rollingwood, TX](#) 1,453  
[San Leanna, TX](#) 537  
[Schwertner, TX](#)  
[Sunset Valley, TX](#) 697  
[Thrall, TX](#) 677  
[Walburg, TX](#)  
[West Lake Hills, TX](#) 3,225

[Bee Cave, TX](#) 4,910  
[Buda, TX](#) 9,443  
[Coupland, TX](#) 186  
[Del Valle, TX](#)  
[Elgin, TX](#) 8,224  
[Garfield, TX](#) 1,576  
[Hays, TX](#) 335  
[Hutto, TX](#) 18,839  
[Jonestown, TX](#) 2,115  
[Lakeway, TX](#) 12,709  
[Lockhart, TX](#) 12,966  
[Manor, TX](#) 5,936  
[Mc Dade, TX](#)  
[Mountain City, TX](#) 663  
[Paige, TX](#)  
[Prairie Lea, TX](#)  
[Rosanky, TX](#)  
[San Marcos, TX](#) 51,289  
[Smithville, TX](#) 3,890  
[Taylor, TX](#) 16,001  
[Uhland, TX](#) 1,263  
[Webberville, TX](#) 480  
[Wimberley, TX](#) 2,600

## Affirmative Fair Housing Marketing Plan

Least Likely To Apply Calculator

**Property:**      **Gaston Place**

Based on TDHCA assessment that 20% less than the statistical average of the County or MSA requires an affirmative Marketing Plan.

Demographic Characteristic	Gaston Place	Census Tract	80% of Census Tract	County	80% of County	MSA	80% of MSA	Need to Market?
White	30.2%	40.7%	32.6%	50.5%	40.4%	54.7%	43.8%	Yes
Black or African American	49.1%	15.6%	12.5%	8.1%	6.5%	7.0%	5.6%	No
Hispanic or Latino	18.9%	40.7%	32.6%	33.5%	26.8%	31.4%	25.1%	Yes
Asian	0.9%	1.2%	1.0%	5.8%	4.6%	4.7%	3.8%	Yes
American Indian or Alaskan	0.0%	1.7%	1.4%	0.3%	0.2%	0.3%	0.2%	No
Native Hawaiian or Pacific	0.0%	0.0%	0.0%	0.1%	0.1%	0.1%	0.1%	No
Persons with Disabilities	88.9%	18.8%	15.0%	14.9%	11.9%	14.2%	11.4%	No
Families with Children Under 18	0.0%	27.7%	22.2%	28.9%	23.1%	31.8%	25.4%	No

**Least likely to Apply:**      **Asian**  
   **White**  
   **Hispanic**



# Gaston Place

1941 GASTON PLACE DRIVE

512-926-9575



EQUAL HOUSING  
OPPORTUNITY



# Gaston PLACE

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1941 GASTON  
PLACE DRIVE

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512-926-9575





# Introduction

Welcome to the Housing Authority for the City of Austin (HACA). You have joined a high-performing public housing authority consistently recognized for its outstanding performance by the U.S. Department of Housing and Urban Development, the public housing industry and by citizens and stakeholders in the Austin community.

HACA is a cutting-edge public housing authority continuously looking for innovative ways to serve its clients. We are dedicated to improving the lives of more than 19,000 of Austin's low-income citizens -- not only by providing affordable housing, but also through education, workforce development and other programs crucial to fostering self-sufficiency and financial independence.

I hope you see yourself building a career with us. I encourage you to take advantage of all of the benefits available to you as a HACA employee to help you grow and develop both professionally and personally. We look forward to having you on our team as we work to bring opportunity home.

Sincerely,

Michael G. Gerber  
President and CEO

## I. ORGANIZATIONAL PHILOSOPHY

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The Housing Authority of the City of Austin (HACA) is committed to both its customers and employees. This section presents the purpose of this manual, HACA's objectives; HACA's zero tolerance for inappropriate or hurtful behaviors in the workplace, and HACA's expectations for all employees to provide excellent and ethical customer service.

### A. PURPOSE

This Policy and Procedure Manual's (referred to as the Manual) purpose is to provide a set of policies, principles, and procedures for establishing and maintaining a harmonious and productive work environment. It also provides guidelines and expectations for effective employment relationships in the conduct of HACA's business.

This Manual contains general statements of HACA policy and does not include the details of each and every policy. Further, this Manual should not be interpreted as forming an express or implied contract or promise that the policies presented will be applied as written in all cases. While every attempt will be made to keep the Manual current, there may be times when a policy will change before the Manual can be updated. For the most current version of the Manual, employees can access an on-line version located on HACA's internet web page at the HR tab.

Employment with HACA is on an at-will basis. This means that either HACA or the employee may end the relationship at any time and without cause or prior notice. Nothing in this Manual changes the employment-at-will relationship or creates an express or implied contract or promise concerning HACA's policies or practices, including policies or practices it may implement in the future. Accordingly, HACA retains the right to establish, change, and abolish its policies, procedures, practices, rules, guidelines, and regulations at will and as it sees fit to serve the best interests of HACA and its employees.

The Human Resources Director is responsible for distributing the Manual to all employees. Employees are responsible for safeguarding their copy of the Manual and updating it with approved changes. All Manuals are HACA's property and must be returned to the Human Resources Department upon termination of employment.

### B. OBJECTIVES

HACA requires all employees to support the organization's best interest through the implementation of three broad objectives.

**Objective 1:** HACA is committed to a mutually rewarding relationship with its employees. Therefore HACA will:

- (a) Strive to provide equal employment opportunity and treatment regardless of race, creed, color, national origin, sex, age, religion, military status, physical or mental disability, sexual orientation, gender identification, or genetic information;
- (b) Strive to provide a working environment free of harassment and discrimination based on race, creed, color, national origin, sex, age, religion, military status, physical or mental disability, sexual orientation, gender identification, genetic information, the exercise of FMLA rights and any other classification protected by federal, state, or local law;
- (c) Provide compensation and benefits commensurate with the work performed;
- (d) Establish reasonable hours of work based on HACA's production and service needs;
- (e) Monitor and comply with applicable federal, state, and local laws and regulations concerning employee safety;
- (f) Provide training opportunities for employees whose positions warrant the training or to support HACA initiatives;
- (g) Enforce workplace policies in such a manner that it does not interfere with the terms and conditions of employment protected under Federal, State and Local Law;
- (h) Accept constructive suggestions about job duties, working conditions, or personnel policies; and
- (i) Establish appropriate means for employees to discuss matters of concern with their immediate supervisor or department head.

**Objective 2:** As part of its commitment to provide customers with excellent services and to create a productive work environment, HACA expects all employees to:

- (a) Deal with supervisors, coworkers, clients, residents, other customers, community stakeholders, vendors, suppliers, and others in a professional manner;
- (b) Work with residents and clients in a professional, courteous, constructive, friendly, and ethical manner;
- (c) Represent HACA in a positive and ethical manner;
- (d) Perform assigned tasks proficiently and in an efficient manner;
- (e) Abide by attendance policies and be punctual;
- (f) Demonstrate a considerate, friendly, and constructive attitude toward fellow employees; and
- (g) Follow the policies adopted by HACA.

**Objective 3:** As part of its commitment to responsible use of public resources, HACA retains the sole discretion to exercise all managerial functions, including the rights to:

- (a) Assign, supervise, discipline, and dismiss employees;

- (b) Determine and change work start and end times as well as shifts;
- (c) Transfer employees within departments or into other departments and other classifications;
- (d) Determine and change the size and qualifications of the workforce;
- (e) Determine and change the methods by which HACA operations are to be carried out;
- (f) Determine and change the nature, location, services rendered, quantity, and continued operation of the business; and
- (g) Assign duties to employees in accordance with HACA's needs and requirements, and to carry out all ordinary administrative and management functions.

## **C. APPLICABILITY**

These policies shall apply to all employees in the service of HACA and its subsidiaries, including HACA, Southwest Housing Compliance Corporation (SHCC), Blueprint Housing Solutions, Austin Affordable Housing Corporation (AAHC), and Austin Pathways. Failure to comply with these policies will be cause for appropriate disciplinary action up to and including termination.

## **D. EQUAL EMPLOYMENT OPPORTUNITY (EEO)**

HACA maintains zero tolerance for discrimination in the workplace. Essentially, this means that HACA will not discriminate against any employee or applicant on the basis of race, color, religion, sex, age, national origin, disability, veteran status, sexual orientation, gender identification, the exercise of FMLA rights or any other class protected by federal, state, or local legislation. Further HACA values a diverse workforce and actively promotes equal opportunity, diversity and inclusivity. HACA is committed to practicing non-discriminatory employment practices and taking affirmative steps to ensure equal opportunities in all aspects of human resources administration including recruitment, selection, placement, training, transfer, advancement, demotion, layoff, discipline, and termination. All such decisions will be based solely on merit, job-related qualifications, work experience and abilities of the candidates. In some cases, seniority may be considered in the selection process. In addition, all other personnel policies and practices of the organization, including compensation, benefits, safety and health programs, as well as social and recreational activities, will be administered and conducted without regard to any protected classes.

HACA will take all reasonable steps to ensure that each employee's work environment is free of unlawful discrimination or harassment based on any protected class.

All employees of HACA are prohibited from engaging in activities or practices of harassment or discrimination against any individual that may be based on any protected classes while on HACA premises or when acting as a representative of HACA. Employees who violate this policy may receive disciplinary action up to and including immediate termination of employment.

Employees who have equal employment related questions, problems, or complaints should first communicate their concerns to their immediate supervisor when appropriate. If inappropriate to communicate with the individual's supervisor, or if the employee's concerns have not been properly responded to, the employee may pursue their complaint with the Human Resource Department. The Human Resource Department will investigate all complaints related to equal employment. When appropriate, complaints of equal employment may be made to upper management, up to and including the CEO.

No employee will be subject to any form of retaliation or disciplinary action for pursuing a complaint of equal employment opportunity.

If you believe you have been subjected to any form of unlawful discrimination, provide a written complaint to your supervisor or the Human Resource Department. Your complaint should be specific and should include the names of individuals involved as well as the names of any witnesses. HACA will immediately undertake a prompt investigation

and attempt to resolve the situation. HACA will not retaliate against you for filing a complaint and will not knowingly permit retaliation by management, your co-workers or other employees.

If HACA determines that unlawful discrimination has occurred, remedial action will be taken, commensurate with the severity of the offense. Appropriate action will be taken to deter any future discrimination. Whatever action is taken will be made known to you, and HACA will take appropriate action to remedy any loss to you as a result of discrimination.

## **E. AFFIRMATIVE ACTION**

1. Specifically, HACA strives to hire and promote women and minorities in sufficient numbers to approximate their respective proportions in the Texas labor force and Standard Metropolitan Statistical Area (SMSA) for Austin.
2. HACA executive staff and administration are responsible to establish and implement Affirmative Action goals set forth below.
3. It is the responsibility of the Human Resources Department to:
  - a. Assure that each job posting is described in terms of job-related qualifications.
  - b. Expand recruitment efforts to colleges and universities with predominantly minority enrollment, including those designated as historically black colleges and universities as well as Hispanic serving colleges and universities.
  - c. Maintain contact with various civic and community groups that can facilitate female and minority applicants to HACA.
  - d. Review all employment selection devices (tests, interviews, etc.) to ensure they are non-discriminatory.
  - e. Provide Department Directors and Vice Presidents with EEO statistics for their division.
  - f. Provide EEO training to employees, supervisory personnel, Department Directors, and Vice Presidents.
4. It is the responsibility of Supervisors, Department Directors, Vice Presidents, and the President/CEO to:
  - a. Promote a climate that fosters and implements equal employment opportunity in all personnel matters (hiring, promotion, training, etc.);
  - b. Hire, promote, and conduct all aspects of departmental operations according to the Affirmative Action goals; and
  - c. Attempt to resolve EEO complaints informally through supervisory channels.

## **F. AMERICANS WITH DISABILITIES ACT**

HACA is committed to complying with the Americans with Disabilities Act of 1990, as amended. As such, it is the policy of the agency to administer all of its personnel policies, including employment, applications, job qualifications, job specifications, recruitment practices, job structuring, orientation, training, counseling, grievance procedures, evaluation, advancement, discipline and termination - so that there is no discrimination against qualified individuals with disabilities. It is the policy of the Agency to inform employees and job applicants about the right to reasonable accommodations and to provide any and all such reasonable accommodation in the most cost-effective manner unless such would impose an "undue hardship" for the Agency. This determination will be made on a case-by-case

basis, dependent upon the facts involved. No employee or applicant for employment will be denied employment because of the need for reasonable accommodation.

## **G. SEXUAL AND OTHER UNLAWFUL HARASSMENT**

HACA is committed to providing a productive work environment free of unlawful harassment. In order to do so, we must maintain an atmosphere of mutual respect.

To maintain a respectful environment, we must all be sensitive to the differences between welcome, positive personal interaction and unwelcome or uncomfortable interaction. We ask all employees to become familiar with this policy and actively strive to achieve the goal of a harassment-free workplace.

### **Unlawful Harassment in General**

HACA is committed to the maintenance of a working environment free from all forms of discrimination and unlawful harassment of any employee or applicant for employment. HACA is also committed to providing a work environment which is free from conduct that unreasonably interferes with an individual's work performance and/or creates an intimidating, hostile, or offensive working environment. Such conduct, when based on an individual's sex, race, ethnicity, age, religion, disability or any other legally protected characteristic will not be tolerated. All employees will be subject to appropriate disciplinary action, up to and including termination, for any unlawful harassment based on any protected class.

### **Sexual Harassment**

It is illegal and against HACA's policy for any employee, male or female, to sexually harass another employee of the opposite or the same sex. Sexual harassment is defined as "unwelcomed" sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when:

- (a) submission to such conduct is an explicit or implicit condition of employment;
- (b) submission to or rejection of such conduct is used as the basis for or as a factor in any employment decision affecting the individual; or
- (c) such conduct has the purpose or effect of (i) unreasonably interfering with an individual's work performance, or (ii) creating an intimidating, hostile, or offensive working environment.

The creation of an intimidating, hostile, or offensive working environment may include such actions as persistent comments on a worker's sexual preferences or the display of obscene or sexually oriented photographs, drawings or items. However, conduct or actions that arise out of a personal or social relationship and that are not intended to have a discriminatory effect may not be viewed as harassment. HACA will determine whether such conduct constitutes sexual harassment, based on a review of the facts and circumstances of each situation.

This policy prohibits harassment in any form, including verbal, physical or visual harassment. Examples of such harassment include, but are not limited to:

- Verbal conduct such as epithets, derogatory comments, slurs or unwanted sexual advances, invitations or comments.
- Visual conduct such as derogatory posters, photography, cartoons, drawings, items or gestures in the workplace.
- Physical conduct such as assault, unwanted touching, blocking normal movement or interfering with work, directed at an employee because of sex or race or any other protected basis.
- Threats or demands to submit to sexual requests in order to keep a job or avoid some other loss, and offers of job benefits in return for sexual favors.

- Verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe individual, suggestive or obscene invitations.
- Making or threatening reprisals after a negative response to sexual advances.
- Visual conduct such as leering or displaying sexually suggestive objects.
- Sexually degrading words to describe an individual.
- Suggestive notes, letters or invitations.
- Messages or information viewed, stored and/or transmitted by use of our electronic resources with content that may reasonably be considered offensive to any employee.
- Retaliation for having reported or threatened to report harassment.

HACA does not tolerate vulgar, abusive, humiliating or threatening language, practical jokes, or other inappropriate behavior in the work place. HACA will not condone any sexual harassment of its employees, vendors or customers by any means. This includes persistent unwanted advances on another individual while representing HACA. All workers, including supervisors and managers, will be subject to appropriate disciplinary action, up to and including termination, for any act of sexual harassment they commit.

### **Responsibility of Employees and Applicants**

If you witness harassment or believe that you have been harassed, you should advise the harasser, if practical in the circumstances, that such behavior is offensive and unwelcome and will be reported if continued. If you are uncomfortable confronting the harasser directly or if the harassment continues, the following steps should be followed in reporting a complaint of harassment.

#### **Notify the appropriate person**

If you believe you have been unlawfully harassed, provide a written and signed complaint as soon as possible to (i) your supervisor, (unless he or she is the harasser); or (ii) HACA's Human Resources Department. To the extent possible, all notifications will be kept confidential.

#### **Description of misconduct**

Your complaint should include the details of the incident(s), the names of the individuals involved and the names of any witnesses. If you believe you are being harassed, you are encouraged to keep a detailed, written record of the objectionable conduct. HACA will immediately undertake an effective, thorough and objective investigation of the harassment allegations.

#### **Investigation**

Once a complaint has been filed, we will investigate promptly. We will, to the extent practical, maintain the privacy and confidentiality of the party's interests, and we will request the same from all employees involved in the investigation. The investigation may include questioning all parties involved in the incident, as well as interviewing any employees who may have knowledge of the incident in question or other related incidents. Employees found to have engaged in harassment are subject to discipline, including warnings, suspensions, and immediate termination of employment. If our investigation is inconclusive, we will take such action as deemed necessary in the circumstances to remind appropriate personnel of our policy to avoid possible harassment in the future.

#### **Protection against retaliation**

An employee who in good faith raises a concern or makes a report will not be retaliated against in any way. Any report of retaliation by the one accused of harassment, or by employees or management will also be immediately,

effectively, and thoroughly investigated in accordance with HACA's investigation procedure outlined above. If a complaint of retaliation is substantiated, appropriate corrective action, up to and including discharge, will be taken.

We encourage all employees to immediately report any incidents of harassment forbidden by this policy, so that complaints can be quickly and fairly resolved. All Vice Presidents, Directors, Managers and supervisors are obligated to report all instances in which they have information that leads them to believe that any employee has been the target of harassment, whether or not they have received a formal complaint. Failure to do so may result in disciplinary action.

## **H. ANTI-BULLYING POLICY**

HACA maintains a zero tolerance for bullying in the workplace. HACA promotes a positive work environment for all employees. Bullying in the workplace is prohibited.

### **Definition:**

Workplace bullying is repeated, health-harming mistreatment of one or more persons (the targets) by one or more perpetrators. It is abusive conduct that is:

1. Threatening, humiliating, or intimidating, or
2. Work interference – sabotage – which prevents work from getting done, or
3. Verbal abuse.

### **How to report:**

Employees who perceive themselves as experiencing bullying should first ask the perpetrator(s) to stop bullying them. If the behavior continues, the employee should report the behavior to either their immediate supervisor (unless he or she is the bully) or to the Human Resources Department.

### **Consequences:**

An employee found to have bullied another employee will be subject to disciplinary action up to and including termination.

## **I. ETHICS**

### **1. FINANCIAL AND PERSONAL DEALINGS WITH CLIENTS**

a. Employees of HACA are not to have any financial dealings with clients, residents, contractors, or competitors during the period of time that the clients, contractors, or competitors are considered in active status (that is, applying for, negotiating or completing any business transaction[s] with HACA). This provision includes personal loans of money or property between HACA employees and employees of clients, contractors, competitors (individuals or agencies), residents, clients, or the acceptance of gifts by either party from the other of whatever value or nature.

b. All HACA personnel are to maintain professional and appropriate ethics in dealing with all persons and clients, residents, contractors, and competitors (individuals or as agencies). In addition, employees are to refrain from personal involvement of any kind that would in any way reflect negative or discredit HACA or the individual involved.

c. All HACA personnel will hold in strictest confidence and will not disclose, use, lecture upon, or publish any of HACA's proprietary information or confidential information that is provided to or made accessible to employees during their at-will employment, except as such disclosure, use, or publication

may be required in connection with an employee's job duties or unless HACA's President/CEO or his or her designee expressly authorizes such in writing, or if asked questions under oath in a court or administrative proceeding.

d. Violation of any of the above ethical guidelines may result in disciplinary action up to and including termination.

## **2. CONFLICT OF INTEREST**

HACA's standards of conduct govern HACA's officers, directors, supervisors, employees, or agents engaged in the award and administration of HACA contracts, including without limitations, HACA procurement contracts and HACA's subsidiaries' contracts, as follows:

a. A conflict of interest arises when a situation has the potential to undermine the impartiality of an employee because of the possibility of a clash between the employee's self-interest and professional interest or public trust. This includes inappropriate interaction with any of the following: an officer, employee, or other representative of HACA involved in making the award and/or administering the contract; any member of his or her immediate family; his or her partner; or an organization which employs or is about to employ any of the above.

b. No officer, director, supervisor, employee, or agent of HACA shall participate in the selection, award, or administration of a HACA contract if a conflict of interest, real, apparent, or implied, could be involved.

c. No officer, employee, or Board Commissioner of HACA, during his/her tenure or for one (1) year after their employment or service ends, shall have any interest, direct or indirect, in the selection, award, or administration of any HACA contract. Former employees may be engaged within one (1) year of employment with HACA at the discretion of the President/CEO.

d. All HACA officers, directors, supervisors, and employees shall sign an annual statement disclosing any potential conflict of interest in any HACA contract as defined by 2(a) above.

In certain positions, employees may come into contact with sensitive information used to compete for government or other contracts. In these circumstances, the employee may be required to sign a separate non-proprietary information agreement to ensure that the employee does not use any information gained at HACA to work with or assist a competitor.

## **J. PRINCIPLES OF PUBLIC SERVICE**

In addition to the ethics and standards of conduct, all HACA employees will abide by the following six (6) principles of public service.

**TRUSTWORTHINESS.** HACA employees perform their duties with honesty and integrity in conduct and communication. Employees conduct business with competence, fairness, impartiality, efficiency, and effectiveness to enhance the services provided by HACA and the public's trust.

**RESPONSIBILITY.** HACA employees take responsibility for actions, decisions, and statements that impact the Austin affordable housing community and the public. Employees effectively use public resources entrusted to HACA for the benefit of program participants, the city, and the public good.

**RESPECT.** HACA employees treat others with professionalism, consideration, and courtesy. Employees respect other's opinions and beliefs, value individual differences, and seek to reach new solutions based on consensus.

**CARING.** HACA employees build professional relationships with colleagues, peers, residents, program participants, community partners, business partners, and the public based on the highest standards of fairness and consideration. These standards are the foundation of a caring professional environment that supports mutual respect, collaboration toward common goals, and excellence in job performance.



**CITIZENSHIP.** HACA employees strive to be good stewards of the public's trust and public resources. They honor and abide by HACA policies and the laws of the City of Austin, the State of Texas, and the United States.

**FAIRNESS.** HACA employees conduct business with the public and co-workers in an equitable, impartial, and honest manner, without prejudice or favoritism. Decisions are based on objective and balanced judgment and are in accordance with HACA's mission, established policies, and procedures.

**[Back to Top](#)****Chapter 2****FAIR HOUSING AND EQUAL OPPORTUNITY****INTRODUCTION**

This chapter explains the laws and Department of Housing and Urban Development (HUD) regulations requiring Public Housing Authorities (PHAs) to affirmatively further civil rights and fair housing in all federally-assisted housing programs. The letter and spirit of these laws are implemented through consistent policy and processes. The responsibility to further nondiscrimination pertains to all areas of the PHA's public housing operations.

This chapter describes HUD regulations and PHA policies related to these topics in three parts:

Part I: Nondiscrimination. This part presents the body of laws and regulations governing the responsibilities of the PHA regarding nondiscrimination.

Part II: Policies Related to Persons with Disabilities. This part discusses the rules and policies of the public housing program related to reasonable accommodation for persons with disabilities. These rules and policies are based on the Fair Housing Act (42.U.S.C.) and Section 504 of the Rehabilitation Act of 1973, and incorporate guidance from the Joint Statement of The Department of Housing and Urban Development (HUD) and the Department of Justice (DOJ), issued May 17, 2004.

Part III: Prohibition of Discrimination Against Limited English Proficiency Persons. This part details the obligations of the PHA to ensure meaningful access to the public housing program and its activities by persons with limited English proficiency (LEP). This part incorporates the Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons published January 22, 2007, in the *Federal Register*.

**PART I: NONDISCRIMINATION****2-I.A. OVERVIEW**

Federal laws require PHAs to treat all applicants and tenant families equally, providing the same quality of service, regardless of family characteristics and background. Federal law prohibits discrimination in housing on the basis of race, color, religion, sex, national origin, age, familial status and disability. In addition, HUD regulations provide for additional protections regarding sexual orientation, gender identity, and marital status. The PHA will 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, including:

- Title VI of the Civil Rights Act of 1964
- Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988)

- Executive Order 11063
- Section 504 of the Rehabilitation Act of 1973
- The Age Discrimination Act of 1975
- Title II of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern)
- The Violence against Women Act of 2013 (VAWA)
- The Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule, published in the Federal Register February 3, 2012
- Any applicable state laws or local ordinances and any legislation protecting individual rights of tenants, applicants or staff that may subsequently be enacted

When more than one civil rights law applies to a situation, the laws will be read and applied together.

## **2-I.B. NONDISCRIMINATION**

Federal regulations prohibit discrimination against certain protected classes and other groups of people. State and local requirements, as well as PHA policies, can prohibit discrimination against additional classes of people.

Except as allowed by law, the PHA shall not discriminate because of race, color, sex, religion, familial status, age, disability or national origin (called “protected classes”).

Familial status includes one or more individuals under the age of 18 living with 1) a parent or another person having legal custody of such individual or individuals or 2) the designee of such parent or other person having such custody, with the written permission of such parent or other such person. The familial status protections shall also apply to any person who is pregnant or is in the process of securing legal custody of any individual who has not yet attained the age of 18 years.

The PHA will not discriminate on the basis of marital status, gender identity or sexual orientation [FR Notice 02/03/12].

### HACA Policy

HACA will not discriminate against other protected classes including: students or people with Acquired Immune Deficiency or HIV status (“AIDS/HIV” status).

HACA will not use any of these factors to:

- Deny to any family the opportunity to apply for housing, nor deny to any qualified applicant the opportunity to participate in the public housing program.
- Provide housing that is different from that provided to others.
- Subject anyone to segregation or disparate treatment.
- Restrict anyone's access to any benefit enjoyed by others in connection with the housing program.
- Treat a person differently in determining eligibility or other requirements for admission.

- Steer an applicant or tenant toward or away from a particular area based on any of these factors.
- Deny anyone access to the same level of services.
- Deny anyone the opportunity to participate in a planning or advisory group that is an integral part of the housing program.
- Discriminate in the provision of residential real estate transactions.
- Discriminate against someone because they are related to or associated with a member of a protected class.
- Publish or cause to be published an advertisement or notice indicating the availability of housing that prefers or excludes persons who are members of a protected class.

### **Providing Information to Families**

The PHA must take steps to ensure that families are fully aware of all applicable civil rights laws. As part of the public housing orientation process, the PHA will provide information to public housing applicant families about civil rights requirements.

### **Discrimination Complaints**

If an applicant or tenant family believes that the PHA has discriminated against any family member, the family should advise the PHA. HUD requires the PHA to make every reasonable attempt to determine whether the applicant's or tenant family's assertions have merit and take any warranted corrective action.

#### HACA Policy

HACA shall conspicuously post a Fair Housing and Equal Opportunity poster and the toll-free Discrimination Complaint hotline number at each public housing development's community bulletin board and at the HACA central administration office.

Applicants or tenant families who believe that they have been subject to unlawful discrimination may notify HACA either orally or in writing.

HACA will attempt to remedy discrimination complaints made against HACA.

Upon request, HACA will provide a copy of a discrimination complaint form to the complainant and provide them with information on how to complete and submit the form to HUD's Office of Fair Housing and Equal Opportunity (FHEO).

In addition to the policies outlined in the ACOP, HACA further complies with fair housing laws through the implementation of the Affirmatively Furthering Fair Housing Plan as adopted by the HACA Board of Commissioners.

## **PART II: POLICIES RELATED TO PERSONS WITH DISABILITIES**

### **2-II.A. OVERVIEW**

One type of disability discrimination prohibited by the Fair Housing Act is the refusal to make reasonable accommodation in rules, policies, practices or services when such accommodation may be necessary to afford a person with a disability the equal opportunity to use and enjoy a program or dwelling under the program.

The PHA must ensure that persons with disabilities have full access to the PHA's programs and services. This responsibility begins with the first inquiry of an interested family and continues through every programmatic area of the public housing program [24 CFR 8].

The PHA must provide a notice to each tenant that the tenant may, at any time during the tenancy, request reasonable accommodation of a handicap of a household member, including reasonable accommodation so that the tenant can meet lease requirements or other requirements of tenancy [24 CFR 966.7(b)].

#### HACA Policy

HACA will advise applicants and resident families in writing of their right to request accommodations, on the intake application, reexamination documents and notices of adverse action by HACA, by including the following language:

“The Housing Authority is committed to compliance with the Americans with Disabilities Act and the Fair Housing Act. If you or anyone in your family is a person with disabilities, and you require a specific accommodation in order to fully utilize our programs and services, please contact the Housing Authority by calling (512) 477-4488. Se habla español.”

The applicant or resident can request a reasonable accommodation from the Admissions Director or from their assigned Public Housing Manager. The Vice Presidents of Housing and Community Development will be the Reasonable Accommodation Coordinators for public housing.

### **2-II.B. DEFINITION OF REASONABLE ACCOMMODATION**

A “reasonable accommodation” is a change, exception or adjustment to a policy, practice or service that may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces. Since policies and services may have a different effect on persons with disabilities than on other persons, treating persons with disabilities exactly the same as others will sometimes deny them an equal opportunity to use and enjoy a dwelling [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].

Federal regulations stipulate that requests for accommodations will be considered reasonable if they do not create an “undue financial and administrative burden” for the PHA, or result in a “fundamental alteration” in the nature of the program or service offered. A fundamental alteration is a modification that alters the essential nature of a provider's operations.

#### **Types of Reasonable Accommodations**

When it is reasonable (see definition above and Section 2-II.E), the PHA shall accommodate the needs of a person with disabilities. Examples may include but are not limited to:

- Permitting applications and reexaminations to be completed by mail.
- Conducting home visits.
- Permitting a higher utility allowance for the unit if a person with disabilities requires the use of specialized equipment related to the disability.
- Modifying or altering a unit or physical system if such a modification or alteration is necessary to provide equal access to a person with a disability.

- Installing a ramp into a dwelling or building.
- Installing grab bars in a bathroom.
- Installing visual fire alarms for hearing impaired persons.
- Allowing a PHA-approved live-in aide to reside in the unit if that person is determined to be essential to the care of a person with disabilities, is not obligated for the support of the person with disabilities and would not be otherwise living in the unit.
- Providing a designated handicapped-accessible parking space.
- Allowing an assistance animal.
- Permitting an authorized designee or advocate to participate in the application or certification process and any other meetings with PHA staff.
- Displaying posters and other housing information in locations throughout the PHA's office in such a manner as to be easily readable from a wheelchair.

### **2-II.C. REQUEST FOR AN ACCOMMODATION**

If an applicant or participant indicates that an exception, change or adjustment to a rule, policy, practice or service is needed because of a disability, HUD requires that the PHA treat the information as a request for a reasonable accommodation, even if no formal request is made [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].

The family must explain what type of accommodation is needed to provide the person with the disability full access to the PHA's programs and services.

If the need for the accommodation is not readily apparent or known to the PHA, the family must explain the relationship between the requested accommodation and the disability. There must be an identifiable relationship, or nexus, between the requested accommodation and the individual's disability.

#### HACA Policy

HACA will encourage the family to make its request in writing using a reasonable accommodation request form that is available from the Public Housing Manager or the central administration office. However, HACA will consider the accommodation request any time the family indicates that an accommodation is needed whether or not a formal written request is submitted.

### **2-II.D. VERIFICATION OF DISABILITY**

The regulatory civil rights definition for persons with disabilities is provided in Exhibit 2-1 at the end of this chapter. The definition of a person with a disability for the purpose of obtaining a reasonable accommodation is much broader than the HUD definition of disability that is used for waiting list preferences and income allowances.

Before providing an accommodation, the PHA must determine that the person meets the definition of a person with a disability, and that the accommodation will enhance the family's access to the PHA's programs and services.

If a person's disability is obvious or otherwise known to the PHA, and if the need for the requested accommodation is also readily apparent or known, no further verification will be required [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].

If a family indicates that an accommodation is required for a disability that is not obvious or otherwise known to the PHA, the PHA must verify that the person meets the definition of a person with a disability, and that the limitations imposed by the disability require the requested accommodation.

When verifying a disability, the PHA will follow the verification policies provided in Chapter 7. All information related to a person's disability will be treated in accordance with the confidentiality policies provided in Chapter 16. In addition to the general requirements that govern all verification efforts, the following requirements apply when verifying a disability:

- Third-party verification must be obtained from an individual identified by the family who is competent to make the determination. A doctor or other medical professional, a non-medical service agency or a reliable third party who is in a position to know about the individual's disability may provide verification of a disability [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].
- The PHA must request only information that is necessary to evaluate the disability-related need for the accommodation. The PHA may not inquire about the nature or extent of any disability.
- Medical records will not be accepted or retained in the participant file.
- In the event that the PHA does receive confidential information about a person's specific diagnosis, treatment, or the nature or severity of the disability, the PHA will dispose of it. In place of the information, the PHA will note in the file that the disability and other requested information have been verified, the date the verification was received, and the name and address of the knowledgeable professional who sent the information [Notice PIH 2010-26].

## **2-II.E. APPROVAL/DENIAL OF A REQUESTED ACCOMMODATION**

[Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act, Notice PIH 2010-26]

The PHA must approve a request for an accommodation if all following four conditions are met.

- The request was made by or on behalf of a person with a disability.
- There is a disability-related need for the accommodation.
- The requested accommodation is indeed for the purpose of affording a person with a disability an equal opportunity to use and enjoy a program, service or dwelling under the program.
- The requested accommodation is reasonable, meaning it would not impose an undue financial and/or administrative burden on the PHA, or fundamentally alter the nature of the PHA's operations.

Requests for accommodations must be assessed on a case-by-case basis. The determination of undue financial and administrative burden must be made on a case-by-case basis involving



various factors, such as the overall size of the PHA's program with respect to the number of employees, type of facilities and size of budget, type of operation including composition and structure of workforce, the nature and cost of the requested accommodation, and the availability of alternative accommodations that would effectively meet the family's disability-related needs.

Before making a determination whether to approve the request, the PHA may enter into discussion and negotiation with the family, request more information from the family or may require the family to sign a consent form so that the PHA may verify the need for the requested accommodation.

#### HACA Policy

After a request for an accommodation is presented, HACA will respond, in writing, within 30 calendar days.

If HACA denies a request for an accommodation, the notice will inform the family of the right to appeal HACA's decision through an informal hearing (if applicable) or the grievance process (see Chapter 14).

If HACA denies a request for an accommodation because it is not reasonable (it would impose an undue financial and/or administrative burden or fundamentally alter the nature of HACA's operations), HACA will either list recommended alternatives or include a request to discuss with the family whether an alternative accommodation could effectively address the family's disability-related needs without a fundamental alteration to the public housing program and without imposing an undue financial and administrative burden. The family will be given 30 days from the date of the written notice to respond and discuss alternative accommodations with HACA.

If the family does not respond to HACA within 30 days of the notice, or if HACA believes that the family has failed to identify a reasonable alternative accommodation after interactive discussion and negotiation, HACA will notify the family, in writing, of its determination within 30 days from the date of the most recent discussion or communication with the family. The notice will inform the family of the right to appeal HACA's decision through an informal hearing (if applicable) or the grievance process (see Chapter 14).

## **2-II.F. PROGRAM ACCESSIBILITY FOR PERSONS WITH HEARING OR VISION IMPAIRMENTS**

HUD regulations require the PHA to take reasonable steps to ensure that persons with disabilities related to hearing and vision have reasonable access to the PHA's programs and services [24 CFR 8.6].

At the initial point of contact with each applicant, the PHA shall inform all applicants of alternative forms of communication that can be used other than plain language paperwork.

#### HACA Policy

To meet the needs of persons with hearing impairments, TTD/TTY (text telephone display /teletype) communication will be available. This service is available through Relay Texas. Relay Texas provides telephone-interpreting service between people who can hear ('voice' users) and those who are deaf, hard-of-hearing, deaf-blind or speech-disabled.



Additional accommodations include providing sign language interpreters, at HACA's expense, for scheduled appointments and meetings, upon advance request of the hearing impaired resident or applicant.

To meet the needs of persons with vision impairments, large-print and audio versions of key program documents will be made available upon request. When visual aids are used in public meetings or presentations, or in meetings with HACA staff, one-on-one assistance will be provided upon request.

Additional examples of alternative forms of communication include having material explained orally by staff, or having a third party representative (a friend, relative or advocate, named by the applicant/resident) to receive, interpret and explain housing materials and be present at all meetings.

## **2-II.G. PHYSICAL ACCESSIBILITY**

The PHA must comply with a variety of regulations pertaining to physical accessibility, including the following.

- Notice PIH 2010-26
- Section 504 of the Rehabilitation Act of 1973
- The Americans with Disabilities Act of 1990
- The Architectural Barriers Act of 1968
- The Fair Housing Act of 1988

The PHA's policies concerning physical accessibility must be readily available to applicants and resident families. They can be found in three key documents:

- This policy, the Admissions and Continued Occupancy Policy, describes the key policies that govern the PHA's responsibilities with regard to physical accessibility.
- Notice PIH 2010-26 summarizes information about pertinent laws and implementing regulations related to nondiscrimination and accessibility in federally-funded housing programs.
- The PHA Plan provides information about self-evaluation, needs assessment and transition plans.

The design, construction or alteration of PHA facilities must conform to the Uniform Federal Accessibility Standards (UFAS). Notice PIH 2010-26 contains specific information on calculating the percentages of units for meeting UFAS requirements.

Newly constructed facilities must be designed to be readily accessible to and usable by persons with disabilities. Alterations to existing facilities must be accessible to the maximum extent feasible, defined as not imposing an undue financial and administrative burden on the operations of the public housing program.

## **2-II.H. DENIAL OR TERMINATION OF ASSISTANCE**

A PHA's decision to deny or terminate the assistance of a family that includes a person with disabilities is subject to consideration of reasonable accommodation [24 CFR 966.7].

When applicants, including persons with disabilities, are denied assistance, the notice of denial must inform them of their right to request an informal hearing [24 CFR 960.208(a)].

HACA Policy:

The notice shall also stipulate their deadlines in which to request the informal hearing, or the denial shall remain final.

When a family's lease is terminated, the notice of termination must inform the family of their right to request a hearing in accordance with the PHA's grievance process [24 CFR 966.4(l)(3)(ii)].

HACA Policy:

The notice shall also stipulate their deadlines in which to request the grievance hearing, or the termination decision shall remain final.

When reviewing reasonable accommodation requests, the PHA must consider whether reasonable accommodation will allow the family to overcome the problem that led to the PHA's decision to deny or terminate assistance. If a reasonable accommodation will allow the family to meet the requirements, the PHA must make the accommodation [24 CFR 966.7].

In addition, the PHA must provide reasonable accommodation for persons with disabilities to participate in the hearing process [24 CFR 966.56(h)].

HACA Policy:

The accommodation must be requested with advance notice to allow HACA to make the necessary arrangements, for example, contacting a sign language interpreter agency to schedule an interpreter for a hearing.

### **PART III: IMPROVING ACCESS TO SERVICES FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)**

#### **2-III.A. OVERVIEW**

Language for Limited English Proficiency Persons (LEP) can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities or understanding other information provided by the public housing program. In certain circumstances, failure to ensure that LEP persons can effectively participate in or benefit from federally-assisted programs and activities may violate the prohibition under Title VI against discrimination on the basis of national origin. This part incorporates the Final Guidance to Federal Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons, published January 22, 2007, in the *Federal Register*.

The PHA will take affirmative steps to communicate with people who need services or information in a language other than English. These persons will be referred to as Persons with Limited English Proficiency (LEP).

Persons with LEP are defined as persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English. For the purposes of this ACOP, LEP persons are public housing applicants and resident families and parents and family members of applicants and resident families.

In order to determine the level of access needed by person with LEP, the PHA will balance the following four factors: (1) the number or proportion of persons with LEP eligible to be served or likely to be encountered by the public housing program; (2) the frequency with which persons with LEP come into contact with the program; (3) the nature and importance of the program, activity or service provided by the program to people's lives; and (4) the resources available to the PHA and costs. Balancing these four factors will ensure meaningful access by persons with LEP to critical services while not imposing undue burdens on the PHA.

### **2-III.B. ORAL INTERPRETATION**

HACA will offer competent interpretation services free of charge, upon request, to the LEP person.

#### HACA Policy

HACA will utilize a language line for telephone interpreter services.

Where LEP persons desire, they will be permitted to use, at their own expense, an interpreter of their own choosing, in place of or as a supplement to the free language services offered by HACA. The interpreter may be a family member or friend.

HACA will analyze the various kinds of contacts it has with the public, to assess language needs and decide what reasonable steps should be taken. "Reasonable steps" may not be reasonable where the costs imposed substantially exceed the benefits.

Where feasible and possible, according to its language assistance plan (LAP), HACA will train and hire bilingual staff to be available to act as interpreters and translators, will pool resources with other PHAs, and will standardize documents.

### **2-III.C. WRITTEN TRANSLATION**

Translation is the replacement of a written text from one language into an equivalent written text in another language.

#### HACA Policy

In order to comply with written-translation obligations, HACA has taken the following steps:

HACA has provided written translations of vital documents for the eligible LEP language group that constitutes 5 percent or 1,000 persons, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Such documents include but are not limited to: housing application, public housing lease, House Rules, annual lease renewal documents, lease termination notices and grievance hearing notices. Translation of other documents, if needed, can be provided, upon request.

If there are fewer than 50 persons in a different LEP language group, HACA may not translate vital written materials, but will, upon request of the LEP person, provide competent oral interpretation of those written materials, free of cost.

**2-III.D. IMPLEMENTATION PLAN**

After completing the four-factor analysis and deciding what language assistance services are appropriate, the PHA shall determine whether it is necessary to develop a written implementation plan to address the identified needs of the LEP populations it serves.

If the PHA determines that it is not necessary to develop a written implementation plan, the absence of a written plan does not obviate the underlying obligation to ensure meaningful access by persons with LEP to the PHA's public housing program and services.

HACA Policy

HACA has developed a written LEP plan/standard operating procedure. The following five steps were taken when developing the plan. HACA: (1) Identified persons with LEP who need language assistance; (2) identified language assistance measures; (3) trained staff; (4) provided notice to persons with LEP; and (5) is monitoring and updating the LEP plan as needed. The plan will be reviewed on an ongoing basis and will be updated as needed to address the needs of HACA's LEP population.

**EXHIBIT 2-1: DEFINITION OF A PERSON WITH A DISABILITY UNDER  
FEDERAL CIVIL RIGHTS LAWS [24 CFR Parts 8.3 and 100.201]**

A person with a disability, as defined under federal civil rights laws, is any person who:

- Has a physical or mental impairment that substantially limits one or more of the major life activities of an individual.
- Has a record of such impairment.
- Is regarded as having such impairment.

The phrase “physical or mental impairment” includes:

- Any physiological disorder or condition, cosmetic disfigurement or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; or
- Any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness and specific learning disabilities. The term “physical or mental impairment” includes, but is not limited to: such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, drug addiction and alcoholism.
- “Major life activities” includes, but is not limited to, caring for oneself, performing manual tasks, walking, seeing, hearing, breathing, speaking, learning and/or working.
- “Has a record of such impairment” means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major live activities.
- “Is regarded as having an impairment” is defined as having a physical or mental impairment that does not substantially limit one or more major life activities but is treated by a public entity (such as the PHA) as constituting such a limitation; has none of the impairments defined in this section but is treated by a public entity as having such an impairment; or has a physical or mental impairment that substantially limits one or more major life activities, only as a result of the attitudes of others toward that impairment.

The definition of a person with disabilities does not include:

- Current illegal drug users.
- People whose alcohol use interferes with the rights of others.
- Persons who objectively pose a direct threat or substantial risk of harm to others that cannot be controlled with a reasonable accommodation under the public housing program.

The above definition of disability determines whether an applicant or participant is entitled to any of the protections of federal disability civil rights laws. Thus, a person who does not meet this definition of disability is not entitled to a reasonable accommodation under federal civil rights and fair housing laws and regulations.

The HUD definition of a person with a disability is much narrower than the civil rights definition of disability. The HUD definition of a person with a disability is used for purposes of receiving the disabled family preference, the \$400 elderly/disabled household deduction, the allowance for medical expenses or the allowance for disability assistance expenses.

The definition of a person with a disability for purposes of granting a reasonable accommodation request is much broader than the HUD definition of disability. Many people will not qualify as a disabled person under the public housing program, yet an accommodation is needed to provide equal opportunity.

## **EXCERPT FROM TENANT SELECTION PLAN**

### **FAIR HOUSING POLICIES**

#### ***FAIR HOUSING***

The owner/agent will not discriminate in any of the following ways:

- Deny to any household the opportunity to apply for housing, nor deny to any eligible applicant the opportunity to lease housing suitable to its needs,
- Provide housing which is different than that provided others,
- Subject a person to segregation or disparate treatment,
- Restrict a person's access to any benefit enjoyed by others in connection with the housing program,
- Treat a person differently in determining eligibility or other requirements for admission,
- Deny a person access to the same level or services, or
- Deny a person the opportunity to participate in a planning or advisory group which is an integral part of the housing program.

The Fair Housing Act prohibits discrimination in housing and housing related transactions based on race, color, religion, sex, national origin, disability, and familial status. In addition, the city of Austin has added Fair Housing protections based on creed, student status, marital status, sexual orientation, gender identity and age.

#### ***TITLE VI OF THE CIVIL RIGHTS ACT OF 1964***

The owner/agent complies with Title VI of the Civil Rights Act of 1964 which prohibits discrimination based on race, color, or national origin in any program or activity receiving federal financial assistance from HUD.

#### ***SECTION 504 OF THE REHABILITATION ACT OF 1973***

The owner/agent complies with Section 504 of the Rehabilitation Act of 1973 which prohibits discrimination, based on the presence of a disability in all programs or activities operated by recipients of federal financial assistance.

Although Section 504 protections often overlap with the disability discrimination prohibitions included in the Fair Housing Act, Section 504 differs in that it imposes broader affirmative obligations to make their programs, as a whole, accessible to persons with disabilities.

- Coordinating Efforts to Comply with Section 504 Requirements  
The owner/agent has designated a person to address questions or requests regarding the specific needs of residents and applicants with disabilities. This person is referred to as the Section 504 Coordinator.

Name of Section 504 Coordinator:	Vice President of Housing and Community Development
Address:	1124 S IH 35, Austin, TX 78704
Phone Number:	(512) 477-4488
TDD/TTY Number:	1-800-735-2989 Or 711 Voice Relay

- Requests for Reasonable Accommodation or Modification

In accordance with the Fair Housing Act and Section 504 of the Rehabilitation Act, the owner/agent will make reasonable accommodations or modifications for individuals with disabilities (applicants or residents) unless these modifications would change the fundamental nature of the housing program or result in undue financial and administrative burden. Please see HACA's Reasonable Accommodation Policy for additional information.

#### ***PRIVACY POLICY***

It is the policy of the owner/agent to guard the privacy of individuals conferred by the Federal Privacy Act of 1974 and to ensure the protection of such individuals' records maintained by the owner/agent.

Neither the property owner/agent nor its agents shall disclose any personal information contained in its records to any person or agency, other than HUD, its Contract Administrators or other federal/state entity or investor auditing entities, unless the individual about whom information is requested gives written consent to such disclosure. Such consent may be provided in an equally effective manner, as a reasonable accommodation, when there is the presence of a disability.

This Privacy Policy in no way limits the owner/agent's ability to collect such information to determine eligibility, compute rent, or determine an applicant's suitability for tenancy.

#### ***COMPLIANCE WITH REQUIREMENTS OUTLINED IN THE VIOLENCE AGAINST WOMEN REAUTHORIZATION ACT OF 2013***

The owner/agent understands that, regardless of whether state or local laws protect victims of domestic violence, dating violence, sexual assault or stalking, people who have been victims of violence have certain protections provided through the Violence Against Women Reauthorization Act of 2013 (VAWA 2013).

If any applicant or resident wishes to exercise the protections provided in the VAWA 2013, he/she should contact the owner/agent immediately. The owner/agent will not assume that any act is a result of abuse covered under the VAWA 2013. In order to receive the protections outlined in the VAWA 2013, the applicant/applicant must specify that he/she wishes to exercise these protections. The owner/agent will provide an individual with a copy of the VAWA Policy upon request.

#### ***THE EQUAL ACCESS RULE***

The owner/agent ensures that HUD's core housing programs are open to all eligible persons regardless of sexual orientation, gender identity or marital status in accordance with *The Equal Access Rule*.





# HOUSING AUTHORITY OF THE CITY OF AUSTIN

*Bringing Opportunity Home*

## ***Limited English Proficiency Standard Operating Procedure***

Department: Housing and Community Development

Program: Project Based Rental Assistance (PBRA)

Division/Function: Property Management

SOP #: F-2 Implementation Date: \_\_\_\_\_

- A. PRINCIPLE:** The purpose of this SOP is to establish the procedures management staff will follow when working with persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English.
- B. SCOPE:** Includes guidance to ensure that individuals with limited English proficiency (LEP) may effectively participate in and have equal access to Multifamily Housing programs and to ensure compliance with Title VI regarding discrimination based on national origin.
- C. RESOURCES:** The resources needed for this process include:

<b>Forms:</b>	<ul style="list-style-type: none"><li>• <i>I Speak</i> cards</li></ul>
<b>Other Essential SOPs or documents:</b>	<ul style="list-style-type: none"><li>• N/A</li></ul>
<b>Other Resources:</b>	<ul style="list-style-type: none"><li>• 4350.3 REV 1, Change 4, Chapter 2</li><li>• January 22, 2007 Notice: Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons</li><li>• Executive Order 13166, titled "Improving Access to Services by Persons with Limited English Proficiency."</li><li>• <i>Masterword Language Line</i> (phone # to be added)</li></ul>

### **Overview:**



# HOUSING AUTHORITY OF THE CITY OF AUSTIN

## *Bringing Opportunity Home*

The Housing Authority of the City of Austin (O/A) has taken affirmative steps to communicate with people who need services or information in a language other than English. These persons will be referred to as persons with Limited English Proficiency (LEP).

Persons with LEP are defined as persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English. This policy is applicable to persons with LEP currently housed on O/A properties as well as applicants.

For persons with LEP, language may be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities or understanding other information provided by the O/A.

In certain circumstances, failure to ensure that persons with LEP can effectively participate in or benefit from federally assisted programs and activities may violate the prohibition under Title VI against discrimination based on national origin.

This SOP incorporates the Notice of Guidance to Federal Assistance Recipients Regarding Title VI Prohibition Affecting Limited English Proficient Persons, published December 19, 2003, in the Federal Register.

### **D. PROCEDURE:**

#### **Application**

1. Spanish has been determined to be the dominant language of the majority of persons with LEP served by the O/A.
2. In order to determine the level of access needed by a person with LEP, the O/A will balance the following four factors:
  - (1) The **number or proportion** of persons with LEP eligible to be served or likely to be encountered by management staff;
  - (2) The **frequency** with which persons with LEP come into contact with management staff;
  - (3) The **nature and importance** of the program, activity or service provided by the O/A to people's lives; and
  - (4) The **resources available** to the O/A and the costs.

Balancing these four factors will ensure meaningful access by persons with LEP to critical services while not imposing undue burdens on the O/A.

#### **Oral Interpretation**



# HOUSING AUTHORITY OF THE CITY OF AUSTIN

## *Bringing Opportunity Home*

1. At appointments, informational briefings, informal hearings or situations in which health, safety or access to important benefits and services are at stake, the O/A will generally offer, or ensure that the family is offered through other sources, competent interpretation services free of charge to the person with LEP.
2. Where feasible, the O/A trains and hires bilingual staff to be available to act as interpreters and translators. Where feasible and possible, the O/A will encourage the use of qualified community volunteers.
3. Where persons with LEP desire, they will be permitted to use, at their own expense, an interpreter of their own choosing, in place of or as a supplement to the free language services that may be offered by the O/A.
4. If a client speaks a language other than Spanish, or if the O/A does not have a staff member available that can interpret in the language of the client, staff may use the *Masterword Language Line* (phone # to be added).
  - a. When the call is placed, the caller will identify him or herself and will use the O/A name as the account number.
  - b. They will then request the language they need.
  - c. Management staff will get approval, via email, from the Community Director (CD) before using this service.
  - d. A log will be kept by management staff documenting the applicant's/resident's name, the language needed, the date of the call and approximate duration of the call.
  - e. A copy of the log will be provided to the purchasing department to back-up the invoice.
  - f. Management staff may also use *I Speak* cards to help identify the language needed.
5. For persons with hearing impairments, if applicant/resident requests interpreting services, management staff will contact CSD services at (512) 837-8030.

### **Written Translation**

1. Spanish has been determined to be the dominant language of the majority of persons with LEP served by the O/A.
2. In order to comply with written translation obligations, the O/A has completed extensive written translations of vital Multifamily housing program documents into Spanish for LEP purposes. Such documents include but are not limited to: the housing application, briefing packet, lease, house rules, O/A zero tolerance policy, mold addendum, minimum rent hardship exemption notice, annual recertification packet,



# HOUSING AUTHORITY OF THE CITY OF AUSTIN

## *Bringing Opportunity Home*

notice of rent change, termination notices, VAWA lease addendum and notice of grievance hearing. Translated documents are included in the Spanish translation folder for staff to access. Other documents, if needed, can be provided orally upon request. Most Multifamily HUD documents and forms are available in many languages at [www.hud.gov](http://www.hud.gov).

3. If there are fewer than 50 persons in a different LEP language group, O/A will, upon request of the LEP person, provide competent oral interpretation of those written materials, free of cost.

### **Staff Procedures**

1. Upon a client's request, management staff will provide the applicant/resident forms in the preferred language when available.
2. For processing purposes, management staff will have the applicant/resident sign all English language forms as well as non-English forms.
3. For any future correspondence after the preferred language is identified, staff will provide notifications in Spanish for clients who indicated they prefer notices in Spanish. For other languages, if the document translation is not available, staff will provide oral interpretation of documents if requested following the procedures described in step 3 under "Written Translations".

No additional procedures are required for units layered with LIHTCs.



# HOUSING AUTHORITY OF THE CITY OF AUSTIN

*Bringing Opportunity Home*

## ***Reasonable Accommodation Procedures***

### ***Standard Operating Procedure***

Department: Housing and Community Development

Program: Project Based Rental Assistance (PBRA)

Division/Function: Property Management

SOP #: F-1 Implementation Date: \_\_\_\_\_

- A. PRINCIPLE:** The purpose of this SOP is to relate to staff the proper procedures to follow when an applicant/resident requests a reasonable accommodation (RA).
- B. SCOPE:** Includes procedures for determining eligibility for an RA, verification of the disability-related need for the RA, response to a request, approval or denial and documentation requirements.
- C. RESOURCES:** The resources needed for this process include:

<b>Forms:</b>	<ul style="list-style-type: none"><li>• Reasonable Accommodation Request form</li><li>• Consent to release information for verification</li><li>• Verification Request form</li></ul>
<b>Other Essential SOPs or documents:</b>	<ul style="list-style-type: none"><li>• H-15 Reasonable Accommodation Modifications</li></ul>
<b>Other Resources:</b>	<ul style="list-style-type: none"><li>• Fair Housing Act (42 U.S.C.)</li><li>• Section 504 of the Rehabilitation Act of 1973</li><li>• Joint Statement of The Department of Housing and Urban Development and the Department of Justice (DOJ), issued May 17, 2004</li><li>• 24 CFR Part 8</li><li>• 24 CFR 100.204</li><li>• FHEO Notice 2013-01</li><li>• HUD "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons," 72 FR 2732 (January 22, 2007)</li></ul>



# HOUSING AUTHORITY OF THE CITY OF AUSTIN

*Bringing Opportunity Home*

- 10 TAC Chapter 1, Subchapter B
- 10 TAC §10.610 Written Policies and Procedures

## **OVERVIEW:**

### **DEFINITION OF A PERSON WITH A DISABILITY UNDER FEDERAL CIVIL RIGHTS LAWS (24 CFR PARTS 8.3 AND 100.201)**

A person with a disability is an individual with a physical or mental impairment that substantially limits one or more major life activities, such as seeing, hearing, walking, breathing, performing manual tasks, caring for oneself, learning and speaking. This list is not exhaustive; see the O/A form regarding Definition of a Person with a Disability under Federal Civil Rights Laws (24 CFR Parts 8.3 and 100.201).

### **WHEN THE HOUSING AUTHORITY OF THE CITY OF AUSTIN (O/A) WILL INFORM APPLICANTS AND RESIDENTS OF THE RIGHT TO REQUEST A REASONABLE ACCOMMODATION:**

- The O/A will inform applicants and residents of their right to request a reasonable accommodation at the time of application, at initial briefings and at annual re-examination.
- The O/A will also post notices in centralized areas on community and administration bulletin boards.

### **WHO MAY REQUEST A REASONABLE ACCOMMODATION:**

- Any family that includes a person with a disability assisted under the Multifamily Housing program may request a reasonable accommodation in rules, policies, practices or services when such accommodation may be necessary to afford a person with a disability the equal opportunity to use and enjoy a program or dwelling under the program.
- Federal regulations stipulate that requests for accommodations will be considered reasonable if they do not create an “undue financial or administrative burden” for the O/A, or result in a “fundamental alteration” in the nature of the program or service offered.

### **SUCH REQUEST FOR REASONABLE ACCOMMODATIONS MAY INCLUDE, BUT ARE NOT LIMITED TO THE FOLLOWING:**

- Permitting applications to be completed by mail.



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- Conducting home visits.
- Permitting a higher utility allowance for the unit if a person with disabilities requires the use of specialized equipment related to the disability.
- Modifying or altering a unit or physical system if such a modification or alteration is necessary to provide equal access to a person with a disability.
- Installing a ramp into a dwelling or building.
- Installing grab bars in a bathroom.
- Installing visual fire alarms for hearing impaired persons.
- Allowing a management-approved live-in aide to reside in the unit if that person is determined to be essential to the care of a person with disabilities, is not obligated for the support of the person with disabilities and would not be otherwise living in the unit.
- Providing a designated accessible parking space.
- Allowing an assistance animal.
- Permitting an authorized designee or advocate to participate in the application or certification process and any other meetings with management staff.
- A change in the way the O/A communicates or provides information.
- A change in the rules or policies to give you an equal opportunity to use the facilities or take part in the Public Housing program.
- For persons with vision impairments, large print or audio versions of key program documents.
- For public meetings or presentations, request for one-on-one assistance.
- Request for a sign language interpretation.
- Request for a transfer to a 504-accessible unit.

### **D. PROCEDURE:**

#### **PROCEDURE FOR REQUESTING A REASONABLE ACCOMMODATION**

- A request is made when a person with a disability, or someone on their behalf, requests a change, exception or adjustment to a rule, policy, practice or service because of their disability; the words "reasonable accommodation" are not required.
- Management staff should ask the applicant/resident to put the request in writing, if they can, but cannot require the applicant/resident to put the request in writing. Applicants and residents may use the *Request for Reasonable Accommodation form* (available in English and in Spanish) or may make an oral request.
- When a family makes an oral request, the staff member who receives the request should complete a memo to file documenting the request.



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- Management staff should never offer an accommodation until one has been specifically requested. Treating people differently because of a perceived disability is discrimination. Each case should be treated on its individual merits to avoid discrimination.

### **VERIFICATION REQUIRED**

- If an applicant/resident requests a reasonable accommodation due to a disability, management staff may request that the individual sign a consent to the release of information, for verification of disability and/or verification of the nexus between the disability and the need for the RA.
- Management staff may request verification from a third party when consent is given by the applicant/resident. Management staff will request only the specific information that is necessary to make a decision.
- Limiting verifications to only physicians is not allowed. Management staff may accept verifications from a qualified individual who is competent to render the opinion and knowledgeable about the person's situation.
- If a person's disability is obvious, or otherwise known to management staff, and if the need for the requested accommodation is also readily apparent or known, no further documentation will be required. However, a memo to file will be included documenting why no further documentation was required.

### **LIMITATIONS ON WHAT CAN BE REQUESTED OR REQUIRED:**

Unless it is relevant to whether the applicant or resident qualifies for the program or type of designated housing, or accommodation, management staff **will not**:

- ask if a person has a disability,
- ask for the nature or extent of the disability,
- ask any question that would require the disabled person to waive or disclose a medical condition or history, or
- ask if any other family member has a disability.

### **RESPONDING TO REQUEST FOR REASONABLE ACCOMMODATIONS:**

- All requests for reasonable accommodations should be forwarded to the Community Director, and if made in writing, should be date stamped by the manager to document when the request was received. If the request was made verbally, a brief memo to the Community Director outlining the applicant/resident's request is to be submitted. The Community Director will determine if the request should be forwarded to the Vice President of Housing and Community Development if necessary. A written response to the applicant/resident will be sent within 30 calendar days. Therefore, all reasonable





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accommodation requests should be forwarded to the Community Director within one business day after receipt for review and response. Ensure a copy of the request is also forwarded to the Compliance Coordinator.

- All denials must inform the applicant/resident of their right to appeal the decision. Denial letters will be drafted and sent by the Community Director or Vice President.
- Only the President/CEO, a Vice President or the Director of Planning and Development has the authority to alter policies and approve physical alterations to units or buildings. Therefore, all formal requests which would require altering policies, structures or practices must be forwarded by the Community Director to the department's Vice President and the Director of Planning and Development for review. This includes informal hearing decisions to grant reasonable accommodation.
- Once a physical alteration/modification is approved, the Community Director will delegate the work to appropriate staff. If a contractor is involved, the Inspections Coordinator is responsible for overseeing the project.

### **THINGS TO CONSIDER WHEN APPROVING OR DENYING A REASONABLE ACCOMMODATION REQUEST:**

The O/A will consider the specific request and the following:

- The cost of the requested accommodation;
- The O/A's financial resources;
- The benefits the accommodation will provide to the family; and
- The availability of alternatives.

### **VALID REASONS FOR DENIAL:**

- The request was not made by or on behalf of a person with a disability.
- There is no obvious or verifiable relationship (nexus) between the requested accommodation and the individual's disability.
- The request is not reasonable because it imposes an undue financial or administrative burden on the O/A.
- The request is not reasonable because it would fundamentally alter the nature of the O/A's operations.
- The request is not reasonable because the physical alteration would impair the unit's structural integrity.
- The ADA does not protect persons who are currently using illegally use controlled substances. (The Act does protect persons recovering from substance abuse.)



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- The ADA does not protect an individual with a disability whose tenancy would constitute a “direct threat” to the health or safety of others or result in substantial physical damage to the property of others unless the threat can be eliminated or significantly reduced by the reasonable accommodation.
- If denied, the O/A will consider the availability of alternative accommodations that would effectively meet the family’s disability-related needs. If such alternatives exist, and are reasonable, management staff will discuss and/or offer such alternatives to the family. The family is not required to accept an alternative offer.
- The O/A may not require persons with disabilities to pay extra fees or deposits as a condition of receiving a reasonable accommodation.

### **REQUIRED DOCUMENTATION AND TRACKING REASONABLE ACCOMMODATION**

#### **REQUESTS:**

- Management staff will keep written and digital proof that good-faith, individual consideration was given to the person requesting the accommodation. Therefore, management staff will document the request and the steps taken to address the request. Documentation will include, at minimum, the date and nature of request and final decision.
- A copy of the request for the reasonable accommodation and response will be kept in the applicant/resident file.
- Community Managers are to provide a copy of all documents and information related to reasonable accommodations to the Community Director and to the Compliance Coordinator. The Community Director will provide the Vice President a digital copy (via email) and a hard copy for approval.
- After the Vice President’s final decision, management staff will scan the complete RA packet into Yardi, including date of request, type of reasonable accommodation requested, date of decision and a brief summary of the decision and whether the request was approved or denied.
- **Confidentiality:** Management staff will keep disability verifications confidential. The O/A will only request/accept verifications that the resident meets the HUD Multifamily definition of disabled and/or the nexus between the disability and the need for the requested RA. Any additional medical information received will be destroyed.



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**Units layered with LIHTCs must comply with state and federal fair housing and antidiscrimination laws; including, but not limited to, consideration of reasonable accommodations requested to complete the application process. Owners of LIHTC developments must comply with Title 10, Chapter 1, Subchapter B. Owners must also maintain a written Reasonable Accommodation policy.**

Title 10, Chapter 1, Subchapter B provides guidance to owners of LIHTC developments regarding the requirements of §504 of the 1973 Rehabilitation Act and the Fair Housing Act including the requirements for reasonable accommodation. <http://tdhca.state.tx.us/pmcdocs/10TAC1-SubchapterB.pdf>

A written reasonable accommodation policy must be maintained at the development. Owners are responsible for ensuring that their employees and contracted third-party management companies are aware of and comply with the reasonable accommodation policy.

The policy must provide:

- Information on how an applicant or current resident with a disability may request a reasonable accommodation; and
- A timeframe in which the owner will respond to a request.

The policy must not:

- Require a household to make a reasonable accommodation request in writing;
- Require a household to provide specific medical or disability information other than the disability verification that may be requested to verify eligibility for reasonable accommodation or special needs set aside program;
- Exclude a household with person(s) with disabilities from admission to the development because an accessible unit is not currently available; or
- Require a household to rent a unit that has already been made accessible.



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## ***Reasonable Accommodation Modifications***

### ***Standard Operating Procedure***

Department: Housing and Community Development

Program: Project Based Rental Assistance (PBRA)

Division/Function: Property Management

SOP #: H-15 Implementation Date: \_\_\_\_\_

- A. PRINCIPLE:** To provide guidance to maintenance staff on procedures to modify and install equipment requested and approved as a reasonable accommodation (RA) or modification for residents, and to provide guidance for appropriate staff on inspecting and approving reasonable accommodation work completed by contractors.
- B. SCOPE:** Includes definition and examples of an reasonable accommodation and outlines UPCS requirements for physical modifications for some of the most commonly requested reasonable accommodations.
- C. RESOURCES:** The resources needed for this process include:

<b>Forms:</b>	<ul style="list-style-type: none"><li>• N/A</li></ul>
<b>Other Essential SOPs or documents:</b>	<ul style="list-style-type: none"><li>• F-1 Reasonable Accommodation Procedures</li></ul>
<b>Other Resources:</b>	<ul style="list-style-type: none"><li>• Fair Housing Act (42 U.S.C.)</li><li>• Section 504 of the Rehabilitation Act of 1973</li><li>• Joint Statement of The Department of Housing and Urban Development and the Department of Justice (DOJ): <i>Reasonable Modifications under the Fair Housing Act</i>, issued May 17, 2004</li><li>• 24 CFR Part 8</li><li>• 24 CFR 100.204</li><li>• FHEO Notice 2013-01</li><li>• 10 TAC Chapter 1, Subchapter B</li><li>• 10 TAC §10.610 Written Policies and Procedures</li></ul>



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### OVERVIEW

An applicant/resident requested change, exception, or adjustment to a rule, policy, practice, or physical change to the living space of the applicant/resident or common areas of the property, which allows a person with a disability to use and enjoy the dwelling and/or common areas or so that the program is readily accessible and usable by a person with disabilities.

A request for reasonable accommodations may include, but is not limited to, the following:

- Permitting applications to be completed by mail.
- Conducting home visits.
- Permitting a higher utility allowance for the unit if a person with disabilities requires the use of specialized equipment related to the disability.
- Modifying or altering a unit or physical system if such a modification or alteration is necessary to provide equal access to a person with a disability.
- Installing a ramp into a dwelling or building.
- Installing grab bars in a bathroom.
- Installing visual fire alarms for hearing impaired persons.
- Allowing a management-approved live-in aide to reside in the unit if that person is determined to be essential to the care of a person with disabilities, is not obligated for the support of the person with disabilities and would not be otherwise living in the unit.
- Providing a designated handicapped-accessible parking space.
- Allowing an assistance animal.
- Permitting an authorized designee or advocate to participate in the application or certification process and any other meetings with management staff.
- Changing the way the O/A communicates or provides information.
- Changing the rules or policies to give you an equal opportunity to use the facilities or take part in the PBRA program.
- Providing large print or audio versions of key program documents for persons with vision impairments,.
- Granting requests for one-on-one assistance for public meetings or presentations. .
- Providing sign language interpretation.
- Allowing a transfer to a 504-accessible unit.



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### **D. PROCEDURE:**

#### **A. INSTALLATION OF GRAB BARS**

Standards for installing grab bars are governed by the Uniform Federal Accessibility Standards (UFAS) as follows:

##### **Back Wall of Toilet**

- a. Length of grab bars must be a minimum of 36 inches. If the minimum required length cannot be installed due to space limitation, install a grab bar that is as close to the minimum required length as possible.
- b. Height of grab bars must be between 33 and 36 inches.
- c. Diameter of grab bars shall be between 1¼ to 1½ inches.

##### **Side Wall of Toilet**

- a. Length of grab bars must be a minimum of 42 inches. If the minimum required length cannot be installed due to space limitation, install a grab bar that is as close to the minimum required length as possible.
- b. Height of grab bars must be between 33 and 36 inches.
- c. Diameter of grab bars shall be between 1¼ to 1½ inches.

##### **Foot of Shower Tub**

- a. Length of grab bars must be a minimum of 24 inches measure from the outer edge of the tub.
- b. Height of grab bars must be between 33 and 36 inches.
- c. Diameter of grab bars shall be between 1¼ to 1½ inches.

##### **Back Wall of Shower Tub**

- a. Two grab bars are required. The grab bar mounted on the back wall shall have a minimum length of 24 inches and shall be located 12 inches maximum from the foot of the tub and 24 inches from the head of the tub. One grab bar shall be located 9 inches above the rim of the tub. The other shall be 33-36 inches above the bathroom floor.
- b. Diameter of grab bars shall be between 1¼ to 1½ inches.



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### **Head of Shower Tub**

- a. At the head of the shower tub grab bars shall have a minimum of 12 inches in length measured from the outer edge of the tub.
- b. Diameter of grab bars shall be between 1 ¼ to 1 ½ inches.

### **B. ENTRANCE RAMPS**

#### **Slope and Rise**

- a. The least possible slope shall be used for any ramp.
- b. The maximum slope of a ramp shall be 1:12 ratio. In another words, for every one inch of rise, a length of twelve inches (one foot) shall be supplemented. For example, a rise of 6 inches will require a ramp to be at least 6 feet of length to satisfy the 1:12 rise over run ratio.

#### **Clear Width**

The minimum clear width of a ramp shall be 36 inches.

#### **Landings**

- a. Ramps shall have level landings at the bottom and top of each run.
- b. The landing shall be as wide as the ramp run leading to it.
- c. If ramps change direction at landings, the minimum landing size shall be 60 inches by 60 inches.

#### **Ramp Hand Rails**

- a. If a ramp run has a rise greater than 6 inches or a horizontal projection greater than 72 inches, then it shall have handrails on both sides.
- b. Handrails shall be provided along both sides of ramp segments. The inside handrails on switchback or dogleg ramps shall always be continuous.
- c. If handrails are not continuous, they shall extend at least 12 inches beyond the top and bottom of the ramp segment and shall be parallel with the floor or ground surface.
- d. Top of handrail gripping surfaces shall be mounted between 30 and 34 inches above ramp surfaces.
- e. Handrails shall not rotate within their fittings.



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### C. Hearing Impaired Smoke Detectors

Smoke alarms with sensory stimulation devices other than standard audible devices should be installed in units that are occupied by the deaf or hearing impaired.

**Units layered with LIHTCs must comply with state and federal fair housing and antidiscrimination laws; including, but not limited to, consideration of reasonable accommodations requested to complete the application process. Owners of LIHTC developments must comply with Title 10, Chapter 1, Subchapter B. Owners must also maintain a written Reasonable Accommodation policy.**

Title 10, Chapter 1, Subchapter B provides guidance to owners of LIHTC developments regarding the requirements of §504 of the 1973 Rehabilitation Act and the Fair Housing Act including the requirements for reasonable accommodation.

<http://tdhca.state.tx.us/pmcdocs/10TAC1-SubchapterB.pdf>

A written reasonable accommodation policy must be maintained at the development. Owners are responsible for ensuring that their employees and contracted third-party management companies are aware of and comply with the reasonable accommodation policy.

The policy must provide:

Information on how an applicant or current resident with a disability may request a reasonable accommodation; and

A timeframe in which the owner will respond to a request.

The policy must not:

Require a household to make a reasonable accommodation request in writing;

Require a household to provide specific medical or disability information other than the disability verification that may be requested to verify eligibility for reasonable accommodation or special needs set aside program;

Exclude a household with person(s) with disabilities from admission to the development because an accessible unit is not currently available; or

Require a household to rent a unit that has already been made accessible.





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## ***Violence Against Women Act (VAWA)***

### ***Standard Operating Procedure***

Department: Housing and Community Development

Program: Project Based Rental Assistance (PBRA)

Division/Function: Property Management

SOP #: F-3 Implementation Date: \_\_\_\_\_

- A. PRINCIPLE:** The purpose of this SOP is to provide guidance to staff for issues related to the Violence Against Women Reauthorization Act of 2013 (VAWA).
- B. SCOPE:** Includes requirements for VAWA notice procedures for staff, residents and applicants claiming protection under VAWA for incidents related to domestic violence, dating violence, sexual assault or stalking.
- C. RESOURCES:** The resources needed for this process include:

<b>Forms:</b>	<ul style="list-style-type: none"><li>• HUD 91067 Lease Addendum</li><li>• HUD 91066 (09/2008) Certification</li></ul>
<b>Other Essential SOPs or documents:</b>	<ul style="list-style-type: none"><li>• D-1 Eviction</li><li>• Tenant Selection Plan</li><li>• House Rules</li></ul>
<b>Other Resources:</b>	<ul style="list-style-type: none"><li>• Violence Against Women Reauthorization Act of 2013 (VAWA 2013)</li><li>• 24 CFR Parts 5, 92, 200, et al.</li><li>• Federal Register Notice 8/6/13</li><li>• Notice H 09-15 (VAWA)</li><li>• 10.TAC §610 Written Policies and Procedures</li><li>• 10 TAC §613 Lease Requirements</li></ul>

**D. PROCEDURE:**

**Notice Requirements:**

Form HUD-91066 and the VAWA Lease Addendum (form HUD-91067) are found in Yardi.



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Form **HUD-91066** is given to:

- Applicants at the time they are given notice of rejection
- Residents at the time of move-in
  - In the move-in packet
- Residents for unit transfers
  - With the Request for Transfer letter
- Residents at annual recertification
  - With the required AR packet (Fact Sheets, etc.)
- In the event of a termination or start of an eviction for cause
  - With termination or eviction notice

All household members 18 years of age and older must sign the VAWA Lease Addendum (form **HUD-91067**) at move-in or, upon notification, within 7 days of their 18th birthday. The form is to be retained in the file according to pink sheet.

VAWA information must be displayed on each site's bulletin board, including how to contact the office to claim protection under the Act. Sites must also display information on how to obtain a copy of the Tenant Selection Plan (TSP) and House Rules, which also contain information on VAWA.

### **Certification:**

If an applicant or resident requests VAWA information, management staff should review VAWA Notice H 09-15 with them in a private setting.

If an applicant or resident requests VAWA protection, management staff should notify their Community Director by email the same business day and submit all documentation immediately after receipt of all required verification(s).

Residents wishing to claim VAWA protection should clearly state what action they are requesting (i.e.: exception to screening criteria for applicant to be admitted, protection from eviction, bifurcation of lease, etc.) and provide verification supporting their claim in the form of at least one of the following:

1. A completed, signed form HUD-91066, providing victim's name, name of abuser/perpetrator if known by the victim and safe to provide, abuser's relationship to victim, date/time/location of incident of violence, and a description of the violence.



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2. A federal, state, tribal, territorial or local police or court or administrative record documenting the domestic violence, dating violence, sexual assault or stalking.
3. Documentation signed by a person who has assisted the victim in addressing domestic violence, dating violence, sexual assault, or stalking, or the effects of such abuse. This person may be an employee, agent, or volunteer of a victim service provider; an attorney; a mental health professional; or a medical professional. The person signing the documentation must attest under penalty of perjury to the person's belief that the incidents in question are bona fide incidents of abuse. The victim must also sign the documentation.

At management's discretion, protection may be provided based solely on an individual's statement or other corroborating evidence without requiring formal documentation of abuse. Acceptance of the statement or evidence will be documented in the applicant/resident file.

The owner/agent (O/A) will not require third-party verification (2 and 3 above) in addition to certification (1 above) with one exception. In the case where the O/A receives conflicting certification documents from two or more family members (i.e. two members of the household submit a form HUD-91066 claiming to be the victim and naming one or more other petitioning household members as the perpetrator), the applicants/tenants are required to submit verification from a third-party source (2 and 3 above).

Additional documentation is required if the perpetrator of domestic violence is currently a member of the household, and the victim is requesting their removal from the lease (lease bifurcation). The individual seeking protection under VAWA must sign a statement (1) requesting that the perpetrator be removed from the application or lease and (2) certifying that the perpetrator will not be permitted to visit or stay as a guest in the unit.

Whether or not the perpetrator is the head of household, all remaining family members will be moved to a new unit with a new lease, while the perpetrator remains in the original unit on the original lease for purposes of eviction.

Verification(s) must be submitted within 14 business of the VAWA claim, unless an extension is given by management. If the individual fails to provide documentation within this time frame, the O/A will deny the request for protection under VAWA.

### **Confidentiality:**



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All information provided to the O/A regarding domestic violence, dating violence, sexual assault or stalking, including the fact that an individual is a victim of such violence or stalking (actual or perceived) must be maintained in confidence, in a file separate from the resident file and in a separate filing cabinet, and may not be entered into any shared database. O/A employees or others will not access the information unless they are explicitly authorized to do so and have a need to know the information for purpose of their work. Documentation will not be provided to any related entity or individual, except to the extent that the disclosure (a) is requested or consented to by the individual in writing, (b) is required for use in an eviction proceeding, or (c) is otherwise required by applicable law.

**No additional procedures are required for units layered with LIHTCs. Applicant screening criteria must be described in a written Tenant Selection Criteria as described in 10 TAC §10.610 and Lease Requirements in 10 TAC §10.613.**

10 TAC §10.610 requires:

- That notice be provided to applicants and current residents about VAWA 2013 protections.
- Written Tenant Selection Criteria be developed and followed. The criteria must not in accordance with VAWA, deny admission on the basis that the applicant has been a victim of domestic violence, dating violence, sexual assault, or stalking.

10 TAC §10.613 requires:

- That all owners comply with the lease requirements found in Section 601 of VAWA 2013.

# **NAHRO**

## **Fair Housing Training**

### **Introduction**

The National Association of Housing and Redevelopment Officials (NAHRO) is pleased to work with individual agencies to bring training and technical assistance to them locally. Housing authorities and community leaders alike recognize the many changes and challenges they face within the affordable housing industry as they strive to achieve the common goal of sustainable, viable communities.

### **Scope of Service**

NAHRO will conduct a one-day Fair Housing Act: Disability Nondiscrimination, New Construction Requirements, and Reasonable Accommodations and Reasonable Modifications on-site training for your organization.

The seminar will describe provisions impacting housing programs of Federal financial assistance and those applying to housing generally and it will provide information to assist participants in understanding the interplay between these laws.

Certificates of Completion will be awarded to participants who complete the course requirements.

### **Seminar Format**

The seminar format is lecture and group Q&A. A slide PowerPoint presentation accompanies the program.

### **Materials**

Each participant will receive:

- NAHRO Fair Housing Resource Materials
- Certificate of Completion (upon course completion)

### **Summary of On-site Seminar Responsibilities**

NAHRO

- NAHRO Faculty fee and expenses
  - Manuals and materials used for instruction
  - Certificates of Completion for each participant who successfully fulfills the course requirements
  - Shipping costs of materials to the seminar site and return shipping at seminar
- Conclusion

Organization

- Marketing the seminar and registering the participants, then forwarding registrations to NAHRO
- Reservation and payment of the meeting room facility
- Reservation and payment for audio/visual equipment required for the seminar
- Food and/or beverages served at the seminar (optional)

### **Audio/Visual Equipment & Room Set-Up Requirements**

NAHRO Faculty would prefer that the room be set up in the following manner:

- Table and chair for the instructor
- Participants seating - round tables, six to eight chairs per table
- Flip charts – 1 flip chart and marker for each table
- Projection screen
- Microphone for the instructor, if requested

In the event that round tables cannot be used, then long tables (classroom style) would be acceptable. Since a test will be given, it is important that the participants have sufficient space at the tables. If the room is set up classroom style, then flip charts at the participants' tables may not be necessary.

### **Topics**

- Federal Financial Assistance—Defined
- Additional Fair Housing Laws
- LGBT Protection
- Summary of the Fair Housing Act
- Definitions of Certain Classes
  - Familial Status
  - Disability
- NOT Covered by the Fair Housing Act
- What Does Discrimination Really Mean
- Prohibited Activities under the Fair Housing Act
- Design and Construction Requirements
- The Investigatory Process
- Alternatives to the Investigatory Process
- Special Topics
  - Advertising
  - Occupancy Standards
- Reasonable Accommodation/Reasonable Modification
- Case Studies

## **NAHRO Faculty**

**Dennis Morgan** is a Senior Associate at D L Morgan & Associates. He provides technical assistance and training on SEMAP, Housing Quality Standards (HQS), Public Housing Assessment System (PHAS), Uniform Physical Condition Standards (UPCS), Public Housing and Housing Choice Voucher Eligibility, Income and Rent, Public Housing and Housing Choice Voucher Occupancy, Fair Housing, Admission and Occupancy, Section 8 Administration, Public Housing Administration, Public Housing and Housing Choice Voucher Homeownership, Family Self-Sufficiency, Asset Management, Managing Maintenance, Property Management Essentials,

Moving to Work, Consortia, Relocation, and the PHA Plan. Mr. Morgan also teamed with other senior members to co-author the Public Housing Admission and Occupancy Guidebook, Housing Choice Voucher Homeownership Guidebook, Conversion from Public Housing to the Voucher Guidebook, Consortia articles and many NAHRO, LISC, and NeighborWorks America publications. Mr. Morgan has more than 39 years experience in the public housing industry, including six years as Executive Director of Lucas Metropolitan Housing Authority in Toledo, Ohio, and serving in executive positions in two Florida PHAs for 23 years - including 16 years at the Orlando Housing Authority and seven years as Executive Director of the Deland Housing Authority. He conducts PH and HCV Eligibility, Income and Rent Calculation, PH and HCV Occupancy, HQS, UPCS, Property Management Essentials, Managing Maintenance, FSS, and HCV Program Management Seminars for NAHRO. He authored numerous publications for NAHRO and other national organizations. Additionally, Mr. Morgan works with NAHRO, HUD, and local PHAs in providing technical assistance to individual agencies across the country.

**Richard Wankel** has been employed in the affordable housing industry since 1993. Currently Richard is the Executive Director of the Town of Islip Housing Authority in Long Island, N.Y., serving more than 1,350 families in the public housing and section 8 programs. Richard has also served as Executive Director for the Town of Huntington Housing Authority, after having been hired to lead that agency from troubled status, which was accomplished in four years earning a HUD award for the effort. Richard has served as a management consultant and as Special Counsel to the Board of Commissioners of another agency. He has served as a five time past President of the Assoc. of L.I. Housing Agencies, a Section 8 group, Board member for NYSAHRO and recently founded the Long Island Association of Housing and Renewal Officials Inc., LIAHRO, serving as it's inaugural President, the group seeks to combine all types of affordable housing initiatives into a single minded effort.

Richard's experiences combine all facets of public housing, section 8, affordable housing creation and oversight, new development, mixed use finance housing (2004 NAHRO Award of Merit), organizational structuring, administrative efficiency, policy development, etc. Richard serves on the Board of two not for profit's involved in the affordable housing industry. He is also a member of the NYS, Suffolk County and Washington D.C. bar associations. Richard has served on the NAHRO Professional Development Committee since 2011.

**Eugene Rudder** has worked in the public and affordable housing industry for more than 25 years. Spending five years as Director of Community Building for the Columbia Heights

Development Corporation in Washington, DC Mr. Rudder not only organized community residents regarding such issues as housing, public healthcare, education and workforce development, but played a key role in training community residents in the art of community development and leadership so that they might lead themselves.

While working with the Nelrod Company, Eugene Rudder managed the Washington, DC office with the primary responsibility of securing and managing HUD contracts for the company. Under his leadership, Eugene brought two major contracts to Nelrod including the task of managing HUD's Public and Indian Housing Resource Center and a program to assist housing authorities around the country establish their own local homeownership initiatives.

As a project manager for the EXCEED Corporation, Mr. Rudder led the firm's efforts to assist HUD in the Rental Housing Integrity Improvement Project (RHIIP), working closely with both HUD Headquarters in Washington, DC and housing authorities all over the United States.

As Special Assistant to the Executive Director for the Wilmington Housing Authority, Eugene worked wherever there was a need and in response to the Executive Director's direction, managed the agency's Finance Department for just under one year, managed two HOPE VI applications, worked on various capital projects including Lincoln Towers, a seniors-only mid-rise with a state-of-the-art City fire station occupying the ground floor.



## Asian American Resource Center

**Contact:** Taja Beekley (Facility Manager)

**Address:** 8401 Cameron Rd  
Austin, TX 78754

**Phone #:** (512) 974-1700

**Contact Date:** HACA has already made contact with the Asian American Resource Center (AARC). The initiation of the marketing through the Resource Center will begin 60 days before the estimated date of closing / conversion to PBRA.

**Experience:** The mission of the AARC is to provide cultural spaces, resources, services and educational programs through an Asian American perspective. As such, they understand the Asian community in Austin and already function in the role of communicator of resources.

**Marketing Role:** HACA will provide brochures and flyers to the Asian American Resource Center office. These flyers will be available in English, Spanish, Chinese, Korean and Vietnamese. HACA will also communicate any changes in the application or eligibility process to ensure that they remain aware and can accurately provide instruction to potential applicants.

## Asian Family Support Services of Austin

**Contact:** Amelia Hetherington

**Address:** PO Box 16254  
Austin, TX 78761  
(As a provider of support services for families of domestic violence, AFSSA does not advertise their physical address.)

**Phone #:** (512) 949-5941

**Contact Date:** HACA has already made contact with the Asian Family Support Services of Austin. The initiation of the marketing through AFSSA will begin 60 days before the estimated date of closing / conversion to PBRA.

**Experience:** AFSSA works with Asian families throughout the Austin area. Their mission is to promote abuse free Asian communities through advocacy, support, awareness and access to social services. They are very connected to Asian families in our community who have the greatest need for assistance with housing.

**Marketing Role:** HACA will provide brochures and flyers to the AFSSA office. These flyers will be available in English, Spanish, Chinese, Korean and Vietnamese. HACA will also communicate any changes in the application or eligibility process to ensure that they remain aware and can accurately provide instruction to potential applicants.

## St. Johns Community Center

**Contact:** Mona Allen

**Address:** 7500 Blessing Ave  
Austin, TX 78752

**Phone #:** (512) 972-5139

**Contact Date:** HACA has already made contact with the St. Johns Community Center regarding this marketing. The initiation of the marketing through St. Johns Community Center will begin 60 days before the estimated date of closing / conversion to PBRA.

**Experience:** The mission of the community center is to provide a variety of social services to low and moderate income families in the community. As such, St. Johns serves a wide range of families including the Asian and Hispanic communities. They offer information and referrals to community resources and case management.

**Marketing Role:** HACA will provide brochures and flyers to the St. John's Community Center office. These flyers will be available in English and Spanish. HACA will also communicate any changes in the application or eligibility process to ensure that they remain aware and can accurately provide instruction to potential applicants.

## Travis County Health & Human Services

**Contact:** Kirsten Siegfried (Division of Family Support Services)

**Address:** 100 N IH 35 Suite 2000  
Austin, TX 78701

**Phone #:** (512) 854-4467

**Contact Date:** HACA has already made contact with Travis County Health and Human Services. The initiation of the marketing through the Travis County offices will begin 60 days before the estimated date of closing / conversion to PBRA.

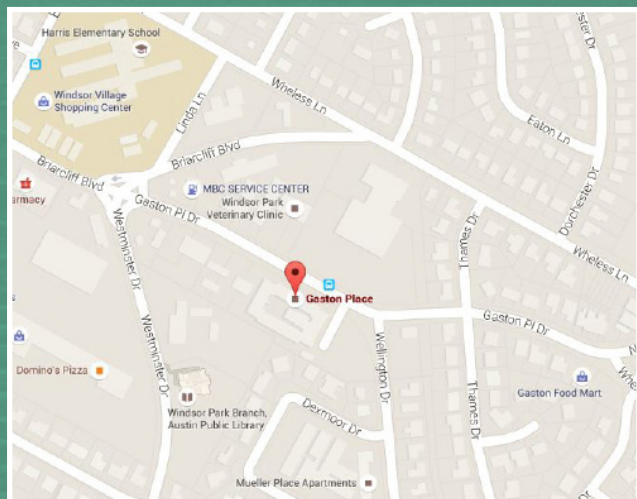
**Experience:** As a county-wide social service agency with 7 different locations, Travis County Health and Human Services has extensive experience working with Hispanic, African-American, Caucasian and Asian populations. They are knowledgeable of the housing programs offered through HACA, including the application and eligibility process.

**Marketing Role:** HACA will provide brochures and flyers to the Travis County Health and Human Services offices that are nearest each property. These flyers will be available in English, Spanish, Chinese, Korean and Vietnamese. HACA will also communicate any changes in the application or eligibility process to ensure that they remain aware and can accurately provide instruction to potential applicants.





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# GASTON PLACE APARTMENTS

1941 Gaston Place Dr., Austin, Texas 78723





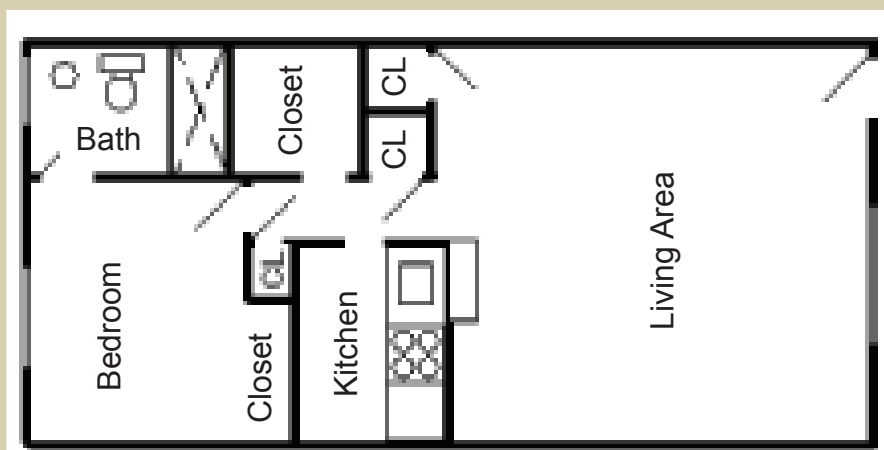
## Gaston Place

Built in 1978, Gaston is a senior/disabled site with 100 one-story units. Located in northeast Austin, the property is near Capital Metro Route 37, and adjacent to Bartholomew Park. All units include central air, Time Warner Cable, and a Google Fiber connection. Residents also have access to a garden, a community room equipped with computers, and an on-site library. Other amenities include off-street parking, a laundry room, and a full-time wellness specialist.

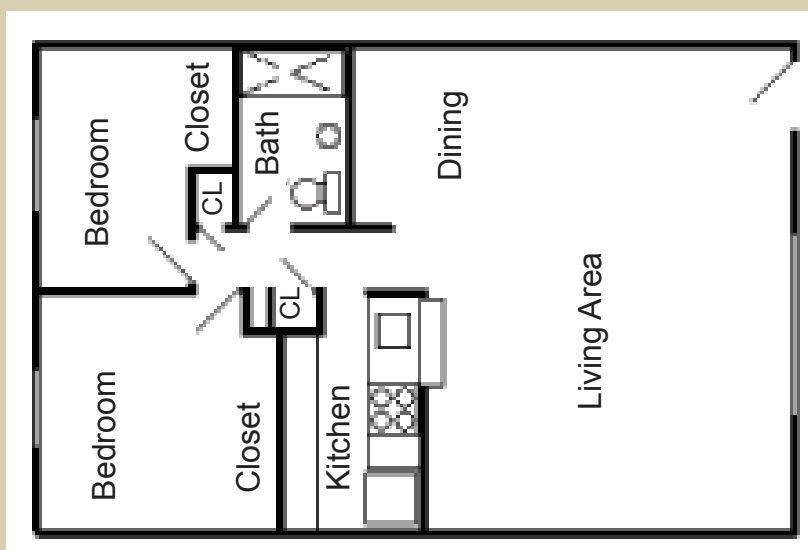


# FLOOR PLANS

## 1 BEDROOM



## 2 BEDROOM



Please note there is a waiting list for this property with special preferences. For more information about how to apply for housing, visit [www.austin.apply4housing.com](http://www.austin.apply4housing.com) or call (844) 467-8513.



# THE HOUSING AUTHORITY OF THE CITY OF AUSTIN

1125 S. IH-35 • (512) 477-4488

[www.hacanet.org](http://www.hacanet.org)

Find us on these  
social media sites:



The Housing Authority of the City of Austin does not discriminate on the basis of disability status in the admission or access to, or treatment or employment in, its federally assisted programs and activities.

The position named below has been designated to coordinate compliance with the nondiscrimination requirements contained in the Department of Housing and Urban Development's implementing Section 504.

Vice President of Housing & Community Development  
1124 S. IH-35 Austin, Texas, 78704  
(512) 477-4488





Note to all applicants/respondents: This form was developed with Nuance, the official HUD software for the creation of HUD forms. HUD has made available instructions for downloading a free installation of a Nuance reader that allows the user to fill-in and save this form in Nuance. Please see <http://portal.hud.gov/hudportal/documents/huddoc?id=nuancereaderinstall.pdf> for the instructions. Using Nuance software is the only means of completing this form.

## Affirmative Fair Housing Marketing Plan (AFHMP) - Multifamily Housing

U.S. Department of Housing  
and Urban Development  
Office of Fair Housing and Equal Opportunity

OMB Approval No. 2529-0013  
(exp.12/31/2016)

### 1a. Project Name & Address (including City, County, State & Zip Code)

Booker T Washington Terraces  
905 Bedford Ave  
Austin, Travis County, TX 78702

### 1b. Project Contract Number

TX 001

### 1c. No. of Units

216

### 1d. Census Tract

8.02

### 1e. Housing/Expanded Housing Market Area

Housing Market Area: Travis County  
Expanded Housing Market Area: Round Rock,  
Austin, San Marcos MSA

### 1f. Managing Agent Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address

### 1g. Application/Owner/Developer Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address

Housing Authority of the City of Austin, 1124 S IH 35, Austin, Travis County, TX 78704  
(512) 477-4488 michaelr@hacanet.org

### 1h. Entity Responsible for Marketing (check all that apply)

☒ Owner ☐ Agent ☐ Other (specify) \_\_\_\_\_

Position, Name (if known), Address (including City, County, State & Zip Code), Telephone Number & Email Address

President / CEO, Michael Gerber 1124 S IH 35, Austin, Travis County, TX 78704  
(512) 477-4488 michaelgerber@hacanet.org

### 1i. To whom should approval and other correspondence concerning this AFHMP be sent? Indicate Name, Address (including City, State & Zip Code), Telephone Number & E-Mail Address.

Director of Housing Operations and Policy, Michael Roth, 1124 S IH 35, Austin, Travis County, TX 78704  
(512) 477-4488 michaelr@hacanet.org

### 2a. Affirmative Fair Housing Marketing Plan

Plan Type  Date of the First Approved AFHMP:

Reason(s) for current update:

### 2b. HUD-Approved Occupancy of the Project (check all that apply)

☐ Elderly ☒ Family ☐ Mixed (Elderly/Disabled) ☐ Disabled

### 2c. Date of Initial Occupancy

Property already occupied as part of the Public Housing program. Conversion through RAD to the Project Based Rental Assistance program anticipated to close in September 2017.

### 2d. Advertising Start Date

Advertising must begin *at least* 90 days prior to initial or renewed occupancy for new construction and substantial rehabilitation projects.

Date advertising began or will begin

For existing projects, select below the reason advertising will be used:

To fill existing unit vacancies ☒  
To place applicants on a waiting list ☒ (which currently has  individuals)  
To reopen a closed waiting list ☐ (which currently has  individuals)

---

**3a. Demographics of Project and Housing Market Area**

Complete and submit Worksheet 1.

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**3b. Targeted Marketing Activity**

Based on your completed Worksheet 1, indicate which demographic group(s) in the housing market area is/are *least* likely to apply for the housing without special outreach efforts. (check all that apply)

- ☒ White      ☐ American Indian or Alaska Native      ☐ Asian      ☐ Black or African American  
☐ Native Hawaiian or Other Pacific Islander      ☐ Hispanic or Latino      ☐ Persons with Disabilities  
☐ Families with Children      ☐ Other ethnic group, religion, etc. (specify)
- 

**4a. Residency Preference**

Is the owner requesting a residency preference? If yes, complete questions 1 through 5.

If no, proceed to Block 4b.

(1) Type

(2) Is the residency preference area:

The same as the AFHMP housing/expanded housing market area as identified in Block 1e?

The same as the residency preference area of the local PHA in whose jurisdiction the project is located?

(3) What is the geographic area for the residency preference?

(4) What is the reason for having a residency preference?

(5) How do you plan to periodically evaluate your residency preference to ensure that it is in accordance with the non-discrimination and equal opportunity requirements in 24 CFR 5.105(a)?

Complete and submit Worksheet 2 when requesting a residency preference (see also 24 CFR 5.655(c)(1)) for residency preference requirements. The requirements in 24 CFR 5.655(c)(1) will be used by HUD as guidelines for evaluating residency preferences consistent with the applicable HUD program requirements. See also HUD Occupancy Handbook (4350.3) Chapter 4, Section 4.6 for additional guidance on preferences.

---

**4b. Proposed Marketing Activities: Community Contacts**

Complete and submit Worksheet 3 to describe your use of community contacts to market the project to those least likely to apply.

**4c. Proposed Marketing Activities: Methods of Advertising**

Complete and submit Worksheet 4 to describe your proposed methods of advertising that will be used to market to those least likely to apply. Attach copies of advertisements, radio and television scripts, Internet advertisements, websites, and brochures, etc.

---



### 5a. Fair Housing Poster

The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place (24 CFR 200.620(e)). Check below all locations where the Poster will be displayed.

☒ Rental Office ☐ Real Estate Office ☐ Model Unit ☒ Other (specify) HACA Administration Building

### 5b. Affirmative Fair Housing Marketing Plan

The AFHMP must be available for public inspection at the sales or rental office (24 CFR 200.625). Check below all locations where the AFHMP will be made available.

☒ Rental Office ☐ Real Estate Office ☐ Model Unit ☒ Other (specify) HACA Administration Building

### 5c. Project Site Sign

Project Site Signs, if any, must display in a conspicuous position the HUD approved Equal Housing Opportunity logo, slogan, or statement (24 CFR 200.620(f)). Check below all locations where the Project Site Sign will be displayed. Please submit photos of Project signs.

☐ Rental Office ☐ Real Estate Office ☐ Model Unit ☒ Entrance to Project ☐ Other (specify)

The size of the Project Site Sign will be 92 Inches x 48 Inches

The Equal Housing Opportunity logo or slogan or statement will be 7 Inches x 6 Inches

### 6. Evaluation of Marketing Activities

Explain the evaluation process you will use to determine whether your marketing activities have been successful in attracting individuals least likely to apply, how often you will make this determination, and how you will make decisions about future marketing based on the evaluation process.

At least every 2 years and in conjunction with updates to the local jurisdiction's Consolidation Plan, HACA's Director of Housing Operations and Policy will do the following:

- 1) Review the demographic makeup of the waiting list and the property.
- 2) Compare this with the demographic makeup of the census tract, county and metropolitan statistical area (MSA).
- 3) This review will be compared to the previous review to determine if improvements were made in attracting the least likely to apply.

The marketing plan will be considered successful if there has been an increase in applications received from individuals considered to be the least likely to apply. If there has been an increase, HACA will continue its marketing plan.

If there has not been an increase, HACA will determine what changes can be made to the marketing plan to better reach those least likely to apply.

If there has been a statistically significant change in the community demographics that indicate a different group is the least likely to apply than was previously determined, HACA will modify its marketing plan to incorporate outreach to that community.

**7a. Marketing Staff**

What staff positions are/will be responsible for affirmative marketing?

Director of Housing Operations and Policy  
Director of Admissions  
Communications Manager

**7b. Staff Training and Assessment: AFHMP**

- (1) Has staff been trained on the AFHMP?
- (2) Has staff been instructed in writing and orally on non-discrimination and fair housing policies as required by 24 CFR 200.620(c)?
- (3) If yes, who provides instruction on the AFHMP and Fair Housing Act, and how frequently?

Director of Housing Operations and Policy together with the Compliance Manager / Trainer.  
Instruction is offered on a quarterly basis as part of staff meetings. In addition, staff receive fair housing training as part of their PHM / COS training, attend the City of Austin Fair Housing Conference every April and other occasional trainings.

- (4) Do you periodically assess staff skills on the use of the AFHMP and the application of the Fair Housing Act?
- (5) If yes, how and how often?

Assessment of staff knowledge and skills is done at the staff meetings by means of quizzes, situational role plays, etc. In addition, we provide focused follow up after any fair housing complaint (substantiated or not).

**7c. Tenant Selection Training/Staff**

- (1) Has staff been trained on tenant selection in accordance with the project's occupancy policy, including any residency preferences?
- (2) What staff positions are/will be responsible for tenant selection?

Admissions Director and Admissions Manager

**7d. Staff Instruction/Training:**

Describe AFHM/Fair Housing Act staff training, already provided or to be provided, to whom it was/will be provided, content of training, and the dates of past and anticipated training. Please include copies of any AFHM/Fair Housing staff training materials.

1. At new hire, staff receives an introduction to Non-Discrimination and Fair Housing. Staff reviews the non-discrimination policies in our personnel handbook, the Fair Housing policies in our Admissions and Continued Occupancy Policy and the Fair Housing Policies in our Tenant Selection Plan. (See Attached)
2. All staff is trained on Reasonable Accommodations, VAWA and Limited English Proficiency SOPs (See Attached SOPs).
3. Annually (in November) all staff receive Ethics training from our legal counsel. Fair housing and non-discrimination are covered in this training. Recent Ethics Training also focused on the new proposed rule for Quid Pro Quo and Harassment.
4. All property managers are required to complete their PHM or COS certification. As part of both training programs, there is a Fair Housing component.
5. Annually (in April) the City of Austin puts on a Fair Housing Seminar which is attended by property management staff.
6. In 2016, all property management staff completed the certification for Fair Housing and Reasonable Accommodations offered by NAHRO. (See attached curriculum)
7. On a quarterly basis as part of managers' meetings, we have a Fair Housing Training / Review component designed to test our staff's knowledge and to provide additional training / review.



**8. Additional Considerations** Is there anything else you would like to tell us about your AFHMP to help ensure that your program is marketed to those least likely to apply for housing in your project? Please attach additional sheets, as needed.

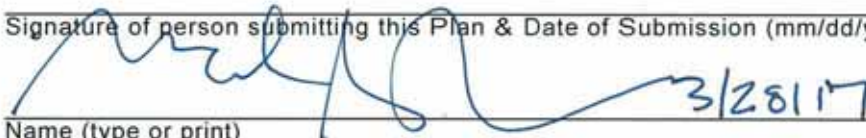
The Housing Authority of the City of Austin (HACA) has a preference for families with a disabled head of household, spouse or co-head. During the 2015 calendar year, 68% of the names drawn off the waiting list were disabled families. During the same calendar year, 21% of the new applications received were from disabled families. The end result is that you will see a low number of disabled families on our waiting list (4.7%), however we do not feel this group is in the "least likely to apply" category.

HACA is committed to fulfill both the letter and the intent of the Fair Housing Act. HACA understands and embraces its responsibility to affirmatively further fair housing. HACA commits to exceed the requirements of this marketing plan in order to serve populations in Austin and Central Texas who are diverse, of low income and of the highest needs. A commitment to compliance and enforcement of the basic requirements are also extended to employment within HACA and are incorporated into all aspects of our training programs.

**9. Review and Update**

By signing this form, the applicant/respondent agrees to implement its AFHMP, and to review and update its AFHMP in accordance with the instructions to item 9 of this form in order to ensure continued compliance with HUD's Affirmative Fair Housing Marketing Regulations (see 24 CFR Part 200, Subpart M). 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. (See 18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Signature of person submitting this Plan & Date of Submission (mm/dd/yyyy)

 3/28/17

Name (type or print)

Michael Gerber

Title & Name of Company

President & CEO, Housing Authority of the City of Austin

**For HUD-Office of Housing Use Only**

Reviewing Official:

**For HUD-Office of Fair Housing and Equal Opportunity Use Only**

☐ Approval

☐ Disapproval

Signature & Date (mm/dd/yyyy)

Signature & Date (mm/dd/yyyy)

Name  
(type  
or  
print)

Title

Name  
(type  
or  
print)

Title

Public reporting burden for this collection of information is estimated to average six (6) hours per initial response, and four (4) hours for updated plans, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget (OMB) control number.

**Purpose of Form:** All applicants for participation in FHA subsidized and unsubsidized multifamily housing programs with five or more units (see 24 CFR 200.615) must complete this Affirmative Fair Housing Marketing Plan (AFHMP) form as specified in 24 CFR 200.625, and in accordance with the requirements in 24 CFR 200.620. The purpose of this AFHMP is to help applicants offer equal housing opportunities regardless of race, color, national origin, religion, sex, familial status, or disability. The AFHMP helps owners/agents (respondents) effectively market the availability of housing opportunities to individuals of both minority and non-minority groups that are least likely to apply for occupancy. Affirmative fair housing marketing and planning should be part of all new construction, substantial rehabilitation, and existing project marketing and advertising activities.

An AFHM program, as specified in this Plan, shall be in effect for each multifamily project throughout the life of the mortgage (24 CFR 200.620(a)). The AFHMP, once approved by HUD, must be made available for public inspection at the sales or rental offices of the respondent (24 CFR 200.625) and may not be revised without HUD approval. This form contains no questions of a confidential nature.

**Applicability:** The form and worksheets must be completed and submitted by all FHA subsidized and unsubsidized multifamily housing program applicants.

#### INSTRUCTIONS:

Send completed form and worksheets to your local HUD Office, Attention: Director, Office of Housing

#### Part 1: Applicant/Respondent and Project

**Identification.** Blocks 1a, 1b, 1c, 1g, 1h, and 1i are self-explanatory.

Block 1d- Respondents may obtain the Census tract number from the U.S. Census Bureau (<http://factfinder2.census.gov/main.html>) when completing Worksheet One.

Block 1e- Respondents should identify both the housing market area and the expanded housing market area for their multifamily housing projects. Use abbreviations if necessary. A **housing market area** is the area from which a multifamily housing project owner/agent may reasonably expect to draw a substantial number of its tenants. This could be a county or Metropolitan Division. The U.S. Census Bureau provides a range of levels to draw from.

An **expanded housing market area** is a larger geographic area, such as a Metropolitan Division or a Metropolitan Statistical Area, which may provide additional demographic diversity in terms of race, color, national origin, religion, sex, familial status, or disability.

Block 1f- The applicant should complete this block only if a Managing Agent (the agent cannot be the applicant) is implementing the AFHMP.

#### Part 2: Type of AFHMP

Block 2a- Respondents should indicate the status of the AFHMP, i.e., initial or updated, as well as the date of the first approved AFHMP. Respondents should also provide the reason (s) for the current update, whether the update is based on the five-year review or due to significant changes in project or local demographics (See instructions for Part 9).

Block 2b- Respondents should identify all groups HUD has approved for occupancy in the subject project, in accordance with the contract, grant, etc.

Block 2c- Respondents should specify the date the project was/will be first occupied.

Block 2d- For new construction and substantial rehabilitation projects, advertising must begin at least 90 days prior to initial occupancy. In the case of existing projects, respondents should indicate whether the advertising will be used to fill existing vacancies, to place individuals on the project's waiting list, or to re-open a closed waiting list. Please indicate how many people are on the waiting list when advertising begins.



### **Part 3 Demographics and Marketing Area.**

"Least likely to apply" means that there is an identifiable presence of a specific demographic group in the housing market area, but members of that group are not likely to apply for the housing without targeted outreach, including marketing materials in other languages for limited English proficient individuals, and alternative formats for persons with disabilities. Reasons for not applying may include, but are not limited to, insufficient information about housing opportunities, language barriers, or transportation impediments.

Block 3a - Using Worksheet 1, the respondent should indicate the demographic composition of the project's residents, current project applicant data, census tract, housing market area, and expanded housing market area. The applicable housing market area and expanded housing market area should be indicated in Block 1e. Compare groups within rows/across columns on Worksheet 1 to identify any under-represented group(s) relative to the surrounding housing market area and expanded housing market area, i.e., those group(s) "least likely to apply" for the housing without targeted outreach and marketing. If there is a particular group or subgroup with members of a protected class that has an identifiable presence in the housing market area, but is not included in Worksheet 1, please specify under "Other."

Respondents should use the most current demographic data from the U.S. Census or another official source such as a local government planning office. Please indicate the source of your data in Part 8 of this form.

Block 3b - Using the information from the completed Worksheet 1, respondents should identify the demographic group(s) least likely to apply for the housing without special outreach efforts by checking all that apply.

### **Part 4 - Marketing Program and Residency Preference (if any).**

Block 4a - A residency preference is a preference for admission of persons who reside or work in a specified geographic area (see 24 CFR 5.655(c)(1)(ii)). Respondents should indicate whether a residency preference is being utilized, and if so, respondents should specify if it is new, revised, or continuing. If a respondent wishes to utilize a residency preference, it must state the preference area (and provide a map delineating the precise area) and state the reason for having such a preference. The respondent must ensure that the preference is in accordance with the non-discrimination and equal opportunity requirements in 24 CFR 5.105(a) (see 24 CFR 5.655(c)(1)).

Respondents should use Worksheet 2 to show how the percentage of the eligible population living or working in the residency preference area compares to that of residents of the project, project applicant data, census tract, housing market area, and expanded housing market area. The percentages would be the same as shown on completed Worksheet 1.

Block 4b - Using Worksheet 3, respondents should describe their use of community contacts to help market the project to those least likely to apply. This table should include the name of a contact person, his/her address, telephone number, previous experience working with the target population(s), the approximate date contact was/will be initiated, and the specific role the community contact will play in assisting with affirmative fair housing marketing or outreach.

Block 4c - Using Worksheet 4, respondents should describe their proposed method(s) of advertising to market to those least likely to apply. This table should identify each media option, the reason for choosing this media, and the language of the advertisement. Alternative format(s) that will be used to reach persons with disabilities, and logo(s) that will appear on the various materials (as well as their size) should be described.

**Please attach a copy of the advertising or marketing material.**

### **Part 5 - Availability of the Fair Housing Poster, AFHMP, and Project Site Sign.**

Block 5a - The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place (24 CFR 200.620(e)). Respondents should indicate all locations where the Fair Housing Poster will be displayed.

Block 5b - The AFHMP must be available for public inspection at the sales or rental office (24 CFR 200.625). Check all of the locations where the AFHMP will be available.

Block 5c - The Project Site Sign must display in a conspicuous position the HUD-approved Equal Housing Opportunity logo, slogan, or statement (24 CFR 200.620(f)). Respondents should indicate where the Project Site Sign will be displayed, as well as the size of the Sign and the size of the logo, slogan, or statement. **Please submit photographs of project site signs.**



## **Part 6 - Evaluation of Marketing Activities.**

Respondents should explain the evaluation process to be used to determine if they have been successful in attracting those individuals identified as least likely to apply. Respondents should also explain how they will make decisions about future marketing activities based on the evaluations.

## **Part 7 - Marketing Staff and Training.**

Block 7a - Respondents should identify staff positions that are/will be responsible for affirmative marketing.

Block 7b - Respondents should indicate whether staff has been trained on the AFHMP and Fair Housing Act.

Please indicate who provides the training and how frequently.

In addition, respondents should specify whether they periodically assess staff members' skills in using the AFHMP and in applying the Fair Housing Act. They should state how often they assess employee skills and how they conduct the assessment.

Block 7c - Respondents should indicate whether staff has been trained on tenant selection in accordance with the project's occupancy policy, including residency preferences (if any). Respondents should also identify those staff positions that are/will be responsible for tenant selection.

Block 7d - Respondents should include copies of any written materials related to staff training, and identify the dates of past and anticipated training.

## **Part 8 - Additional Considerations.**

Respondents should describe their efforts not previously mentioned that were/are planned to attract those individuals least likely to apply for the subject housing.

## **Part 9 - Review and Update.**

By signing the respondent assumes responsibility for implementing the AFHMP. Respondents must review their AFHMP every five years or when the local Community Development jurisdiction's Consolidated Plan is updated, or when there are significant changes in the demographics of the project or the local housing market area. When reviewing the plan, the respondent should consider the current demographics of the housing market area to determine if there have been demographic changes in the population in terms of race, color, national origin, religion, sex, familial status, or disability. The respondent will then determine if the population least likely to apply for the housing is still the population identified in the AFHMP, whether the advertising and publicity cited in the current AFHMP are still appropriate, or whether advertising sources should be modified or expanded. Even if the demographics of the housing market area have not changed, the respondent should determine if the outreach currently being performed is reaching those it is intended to reach as measured by project occupancy and applicant data. If not, the AFHMP should be updated. The revised AFHMP must be submitted to HUD for approval. HUD may review whether the affirmative marketing is actually being performed in accordance with the AFHMP. If based on their review, respondents determine the AFHMP does not need to be revised, they should maintain a file documenting what was reviewed, what was found as a result of the review, and why no changes were required. HUD may review this documentation.

## **Notification of Intent to Begin Marketing.**

No later than 90 days prior to the initiation of rental marketing activities, the respondent must submit notification of intent to begin marketing. The notification is required by the AFHMP Compliance Regulations (24 CFR 108.15). The Notification is submitted to the Office of Housing in the HUD Office servicing the locality in which the proposed housing will be located. Upon receipt of the Notification of Intent to Begin Marketing from the applicant, the monitoring office will review any previously approved plan and may schedule a pre-occupancy conference. Such conference will be held prior to initiation of sales/rental marketing activities. At this conference, the previously approved AFHMP will be reviewed with the applicant to determine if the plan, and/or its proposed implementation, requires modification prior to initiation of marketing in order to achieve the objectives of the AFHM regulation and the plan.

OMB approval of the AFHMP includes approval of this notification procedure as part of the AFHMP. The burden hours for such notification are included in the total designated for this AFHMP form.



**Worksheet 1: Determining Demographic Groups Least Likely to Apply for Housing Opportunities**  
**(See AFHMP, Block 3b)**

In the respective columns below, indicate the percentage of demographic groups among the project's residents, current project applicant data, census tract, housing market area, and expanded housing market area (See instructions to Block 1e). If you are a new construction or substantial rehabilitation project and do not have residents or project applicant data, only report information for census tract, housing market area, and expanded market area. The purpose of this information is to identify any under-representation of certain demographic groups in terms of race, color, national origin, religion, sex, familial status, or disability. If there is significant under-representation of any demographic group among project residents or current applicants in relation to the housing/expanded housing market area, then targeted outreach and marketing should be directed towards these individuals least likely to apply. Please indicate under-represented groups in Block 3b of the AFHMP. **Please attach maps showing both the housing market area and the expanded housing market area.**

Demographic Characteristics	Project's Residents	Project's Applicant Data	Census Tract	Housing Market Area	Expanded Housing Market Area
% White	4.1%	14.2%	17.4%	50.5%	54.7%
% Black or African American	28.9%	50.1%	37.8%	8.1%	7.0%
% Hispanic or Latino	61.2%	31.0%	41.8%	33.5%	31.4%
% Asian	5.5%	2.3%	0.7%	5.7%	4.7%
% American Indian or Alaskan Native	0.1%	1.7%	0.8%	0.8%	0.8%
% Native Hawaiian or Pacific Islander	0.0%	0.4%	0.0%	0.1%	0.1%
%Persons with Disabilities	17.1%	29.1%	30.3%	14.9%	14.3%
% Families with Children under the age of 18	78.4%	58.4%	38.4%	28.9%	34.7%
Other (specify)					
	NA	NA	NA	NA	NA

Worksheet 2: Establishing a Residency Preference Area (See AFHMP, Block 4a)

Complete this Worksheet if you wish to continue, revise, or add a residency preference, which is a preference for admission of persons who reside or work in a specified geographic area (see 24 CFR 5.655(c)(1)(ii)). If a residency preference is utilized, the preference must be in accordance with the non-discrimination and equal opportunity requirements contained in 24 CFR 5.105(a). This Worksheet will help show how the percentage of the population in the residency preference area compares to the demographics of the project's residents, applicant data, census tract, housing market area, and expanded housing market area. **Please attach a map clearly delineating the residency preference geographical area.**

Demographic Characteristics	Project's Residents (as determined in Worksheet 1)	Project's Applicant Data (as determined in Worksheet 1)	Census Tract (as determined in Worksheet 1)	Housing Market Area (as determined in Worksheet 1)	Expanded Housing Market Area (as determined in Worksheet 1)	Residency Preference Area (if applicable)
% White	NA	NA	NA	NA	NA	NA
% Black or African American	NA	NA	NA	NA	NA	NA
% Hispanic or Latino	NA	NA	NA	NA	NA	NA
% Asian	NA	NA	NA	NA	NA	NA
% American Indian or Alaskan Native	NA	NA	NA	NA	NA	NA
% Native Hawaiian or Pacific Islander	NA	NA	NA	NA	NA	NA
% Persons with Disabilities	NA	NA	NA	NA	NA	NA
% Families with Children under the age of 18	NA	NA	NA	NA	NA	NA
Other (specify)	NA	NA	NA	NA	NA	NA

**Worksheet 3: Proposed Marketing Activities –Community Contacts (See AFHMP, Block 4b)**

For each targeted marketing population designated as least likely to apply in Block 3b, identify at least one community contact organization you will use to facilitate outreach to the particular population group. This could be a social service agency, religious body, advocacy group, community center, etc. State the names of contact persons, their addresses, their telephone numbers, their previous experience working with the target population, the approximate date contact was/will be initiated, and the specific role they will play in assisting with the affirmative fair housing marketing. Please attach additional pages if necessary.

Targeted Population(s)	Community Contact(s), including required information noted above.
White	Travis County Health and Human Services - Palm Square 100 N IH 35 Suite 2000, Austin, TX 78704 (512) 854-4467 Kirsten Siegfried (Division of Family Support Services)

Worksheet 4: Proposed Marketing Activities – Methods of Advertising (See AFHMP, Block 4c)

Complete the following table by identifying your targeted marketing population(s), as indicated in Block 3b, as well as the methods of advertising that will be used to market to that population. For each targeted population, state the means of advertising that you will use as applicable to that group and the reason for choosing this media. In each block, in addition to specifying the media that will be used (e.g., name of newspaper, television station, website, location of bulletin board, etc.) state any language(s) in which the material will be provided, identify any alternative format(s) to be used (e.g. Braille, large print, etc.), and specify the logo(s) (as well as size) that will appear on the various materials. Attach additional pages, if necessary, for further explanation. Please attach a copy of the advertising or marketing material.

Targeted Population(s)→ Methods of Advertising ↓	Targeted Population:	Targeted Population:	Targeted Population:
	White		
Newspaper(s)	Austin American Statesman		
Radio Station(s)			
TV Station(s)			
Electronic Media	HACA Website www.hacanet.org Notices in English		
Bulletin Boards			
Brochures, Notices, Flyers	Property Brochures and Flyers in English		
Other (specify)			



## **ATTACHMENTS TO THE AFFIRMATIVE FAIR HOUSING MARKETING PLAN**

**1. Housing Market Area Map (Travis County)**

AFHMP Block 3b. Targeted Marketing Activity

Worksheet 1 Determining Demographic Groups Least Likely To Apply

**2. Expanded Housing Market Area Map (Austin – Round Rock MSA)**

AFHMP Block 3b. Targeted Marketing Activity

Worksheet 1 Determining Demographic Groups Least Likely To Apply

**3. Least Likely To Apply Calculator**

AFHMP Block 3b. Targeted Marketing Activity

Worksheet 1 Determining Demographic Groups Least Likely To Apply

**4. Property Sign with Equal Housing Logo**

AFHMP Block 5c. Project Site Sign

**5. Housing Authority of the City of Austin HACA Personnel Policy**

AFHMP Block 7d. Staff Instruction / Training, 1

**6. HACA ACOP and Tenant Selection Plan – Fair Housing**

AFHMP Block 7d. Staff Instruction / Training, 1

**7. HACA SOP – Limited English Proficiency**

AFHMP Block 7d. Staff Instruction / Training, 2

**8. HACA SOP - Reasonable Accommodations Procedures and Modifications**

AFHMP Block 7d. Staff Instruction / Training, 2

**9. HACA SOP – VAWA**

AFHMP Block 7d. Staff Instruction / Training, 2

**10. NAHRO Fair Housing Training Agenda**

AFHMP Block 7d. Staff Instruction / Training, 6

**11. Additional Information on Community Contacts**

AFHMP Worksheet 3 Proposed Marketing Activities – Community Contacts

**12. Brochures**

AFHMP Worksheet 4 Proposed Marketing Activities – Methods of Advertising

Note to all applicants/respondents: This form was developed with Nuance, the official HUD software for the creation of HUD forms. HUD has made available instructions for downloading a free installation of a Nuance reader that allows the user to fill-in and save this form in Nuance. Please see <http://portal.hud.gov/hudportal/documents/huddoc?id=nuancereaderinstall.pdf> for the instructions. Using Nuance software is the only means of completing this form.

## Affirmative Fair Housing Marketing Plan (AFHMP) - Multifamily Housing

U.S. Department of Housing  
and Urban Development  
Office of Fair Housing and Equal Opportunity

OMB Approval No. 2529-0013  
(exp.12/31/2016)

### 1a. Project Name & Address (including City, County, State & Zip Code)

Meadowbrook Apartments  
1201 W Live Oak St  
Austin, Travis County, TX 78704

### 1b. Project Contract Number

TX 001

### 1c. No. of Units

160

### 1d. Census Tract

13.05

### 1e. Housing/Expanded Housing Market Area

Housing Market Area: Travis County  
Expanded Housing Market Area: Round Rock,  
Austin, San Marcos MSA

### 1f. Managing Agent Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address

### 1g. Application/Owner/Developer Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address

Housing Authority of the City of Austin, 1124 S IH 35, Austin, Travis County, TX 78704  
(512) 477-4488 michaelr@hacanet.org

### 1h. Entity Responsible for Marketing (check all that apply)

☒ Owner ☐ Agent ☐ Other (specify) \_\_\_\_\_

Position, Name (if known), Address (including City, County, State & Zip Code), Telephone Number & Email Address

President / CEO, Michael Gerber 1124 S IH 35, Austin, Travis County, TX 78704  
(512) 477-4488 michaelgerber@hacanet.org

### 1i. To whom should approval and other correspondence concerning this AFHMP be sent? Indicate Name, Address (including City, State & Zip Code), Telephone Number & E-Mail Address.

Director of Housing Operations and Policy, Michael Roth, 1124 S IH 35, Austin, Travis County, TX 78704  
(512) 477-4488 michaelr@hacanet.org

### 2a. Affirmative Fair Housing Marketing Plan

Plan Type  Date of the First Approved AFHMP:

Reason(s) for current update:

### 2b. HUD-Approved Occupancy of the Project (check all that apply)

☐ Elderly ☒ Family ☐ Mixed (Elderly/Disabled) ☐ Disabled

### 2c. Date of Initial Occupancy

Property already occupied as part of the Public Housing program. Conversion through RAD to the Project Based Rental Assistance program anticipated to close in September 2017.

### 2d. Advertising Start Date

Advertising must begin at least 90 days prior to initial or renewed occupancy for new construction and substantial rehabilitation projects.

Date advertising began or will begin

For existing projects, select below the reason advertising will be used:

To fill existing unit vacancies ☒  
To place applicants on a waiting list ☒ (which currently has  individuals)  
To reopen a closed waiting list ☐ (which currently has  individuals)



**3a. Demographics of Project and Housing Market Area**  
Complete and submit Worksheet 1.

**3b. Targeted Marketing Activity**

Based on your completed Worksheet 1, indicate which demographic group(s) in the housing market area is/are *least* likely to apply for the housing without special outreach efforts. (check all that apply)

- ☒ White ☐ American Indian or Alaska Native ☒ Asian ☐ Black or African American  
☐ Native Hawaiian or Other Pacific Islander ☐ Hispanic or Latino ☐ Persons with Disabilities  
☐ Families with Children ☐ Other ethnic group, religion, etc. (specify)

**4a. Residency Preference**

Is the owner requesting a residency preference? If yes, complete questions 1 through 5.   
If no, proceed to Block 4b.

(1) Type

(2) Is the residency preference area:

The same as the AFHMP housing/expanded housing market area as identified in Block 1e?

The same as the residency preference area of the local PHA in whose jurisdiction the project is located?

(3) What is the geographic area for the residency preference?

(4) What is the reason for having a residency preference?

(5) How do you plan to periodically evaluate your residency preference to ensure that it is in accordance with the non-discrimination and equal opportunity requirements in 24 CFR 5.105(a)?

Complete and submit Worksheet 2 when requesting a residency preference (see also 24 CFR 5.655(c)(1)) for residency preference requirements. The requirements in 24 CFR 5.655(c)(1) will be used by HUD as guidelines for evaluating residency preferences consistent with the applicable HUD program requirements. See also HUD Occupancy Handbook (4350.3) Chapter 4, Section 4.6 for additional guidance on preferences.

**4b. Proposed Marketing Activities: Community Contacts**

Complete and submit Worksheet 3 to describe your use of community contacts to market the project to those least likely to apply.

**4c. Proposed Marketing Activities: Methods of Advertising**

Complete and submit Worksheet 4 to describe your proposed methods of advertising that will be used to market to those least likely to apply. Attach copies of advertisements, radio and television scripts, Internet advertisements, websites, and brochures, etc.

### 5a. Fair Housing Poster

The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place (24 CFR 200.620(e)). Check below all locations where the Poster will be displayed.

☒ Rental Office ☐ Real Estate Office ☐ Model Unit ☒ Other (specify) HACA Administration Building

### 5b. Affirmative Fair Housing Marketing Plan

The AFHMP must be available for public inspection at the sales or rental office (24 CFR 200.625). Check below all locations where the AFHMP will be made available.

☒ Rental Office ☐ Real Estate Office ☐ Model Unit ☒ Other (specify) HACA Administration Building

### 5c. Project Site Sign

Project Site Signs, if any, must display in a conspicuous position the HUD approved Equal Housing Opportunity logo, slogan, or statement (24 CFR 200.620(f)). Check below all locations where the Project Site Sign will be displayed. Please submit photos of Project signs.

☐ Rental Office ☐ Real Estate Office ☐ Model Unit ☒ Entrance to Project ☐ Other (specify)

The size of the Project Site Sign will be 94 Inches x 63.5 Inches

The Equal Housing Opportunity logo or slogan or statement will be 6 Inches x 6 Inches

## 6. Evaluation of Marketing Activities

Explain the evaluation process you will use to determine whether your marketing activities have been successful in attracting individuals least likely to apply, how often you will make this determination, and how you will make decisions about future marketing based on the evaluation process.

At least every 2 years and in conjunction with updates to the local jurisdiction's Consolidation Plan, HACA's Director of Housing Operations and Policy will do the following:

- 1) Review the demographic makeup of the waiting list and the property.
- 2) Compare this with the demographic makeup of the census tract, county and metropolitan statistical area (MSA).
- 3) This review will be compared to the previous review to determine if improvements were made in attracting the least likely to apply.

The marketing plan will be considered successful if there has been an increase in applications received from individuals considered to be the least likely to apply. If there has been an increase, HACA will continue its marketing plan.

If there has not been an increase, HACA will determine what changes can be made to the marketing plan to better reach those least likely to apply.

If there has been a statistically significant change in the community demographics that indicate a different group is the least likely to apply than was previously determined, HACA will modify its marketing plan to incorporate outreach to that community.



**7a. Marketing Staff**

What staff positions are/will be responsible for affirmative marketing?

Director of Housing Operations and Policy  
Director of Admissions  
Communications Manager

**7b. Staff Training and Assessment: AFHMP**

- (1) Has staff been trained on the AFHMP?
- (2) Has staff been instructed in writing and orally on non-discrimination and fair housing policies as required by 24 CFR 200.620(c)?

- (3) If yes, who provides instruction on the AFHMP and Fair Housing Act, and how frequently?

Director of Housing Operations and Policy together with the Compliance Manager / Trainer.  
Instruction is offered on a quarterly basis as part of staff meetings. In addition, staff receive fair housing training as part of their PHM / COS training, attend the City of Austin Fair Housing Conference every April and other occasional trainings.

- (4) Do you periodically assess staff skills on the use of the AFHMP and the application of the Fair Housing Act?

- (5) If yes, how and how often?

Assessment of staff knowledge and skills is done at the staff meetings by means of quizzes, situational role plays, etc. In addition, we provide focused follow up after any fair housing complaint (substantiated or not).

**7c. Tenant Selection Training/Staff**

- (1) Has staff been trained on tenant selection in accordance with the project's occupancy policy, including any residency preferences?

- (2) What staff positions are/will be responsible for tenant selection?

Admissions Director and Admissions Manager

**7d. Staff Instruction/Training:**

Describe AFHM/Fair Housing Act staff training, already provided or to be provided, to whom it was/will be provided, content of training, and the dates of past and anticipated training. Please include copies of any AFHM/Fair Housing staff training materials.

1. At new hire, staff receives an introduction to Non-Discrimination and Fair Housing. Staff reviews the non-discrimination policies in our personnel handbook, the Fair Housing policies in our Admissions and Continued Occupancy Policy and the Fair Housing Policies in our Tenant Selection Plan. (See Attached)
2. All staff is trained on Reasonable Accommodations, VAWA and Limited English Proficiency SOPs (See Attached SOPs).
3. Annually (in November) all staff receive Ethics training from our legal counsel. Fair housing and non-discrimination are covered in this training. Recent Ethics Training also focused on the new proposed rule for Quid Pro Quo and Harassment.
4. All property managers are required to complete their PHM or COS certification. As part of both training programs, there is a Fair Housing component.
5. Annually (in April) the City of Austin puts on a Fair Housing Seminar which is attended by property management staff.
6. In 2016, all property management staff completed the certification for Fair Housing and Reasonable Accommodations offered by NAHRO. (See attached curriculum)
7. On a quarterly basis as part of managers' meetings, we have a Fair Housing Training / Review component designed to test our staff's knowledge and to provide additional training / review.

**8. Additional Considerations** Is there anything else you would like to tell us about your AFHMP to help ensure that your program is marketed to those least likely to apply for housing in your project? Please attach additional sheets, as needed.

The Housing Authority of the City of Austin (HACA) has a preference for families with a disabled head of household, spouse or co-head. During the 2015 calendar year, 68% of the names drawn off the waiting list were disabled families. During the same calendar year, 21% of the new applications received were from disabled families. The end result is that you will see a low number of disabled families on our waiting list (4.7%), however we do not feel this group is in the "least likely to apply" category.

HACA is committed to fulfill both the letter and the intent of the Fair Housing Act. HACA understands and embraces its responsibility to affirmatively further fair housing. HACA commits to exceed the requirements of this marketing plan in order to serve populations in Austin and Central Texas who are diverse, of low income and of the highest needs. A commitment to compliance and enforcement of the basic requirements are also extended to employment within HACA and are incorporated into all aspects of our training programs.

**9. Review and Update**

By signing this form, the applicant/respondent agrees to implement its AFHMP, and to review and update its AFHMP in accordance with the instructions to item 9 of this form in order to ensure continued compliance with HUD's Affirmative Fair Housing Marketing Regulations (see 24 CFR Part 200, Subpart M). 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. (See 18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Signature of person submitting this Plan & Date of Submission (mm/dd/yyyy)

Name (type or print)

Michael Gerber

Title & Name of Company

President & CEO, Housing Authority of the City of Austin

**For HUD-Office of Housing Use Only**

Reviewing Official:

**For HUD-Office of Fair Housing and Equal Opportunity Use Only**

☐ Approval

☐ Disapproval

Signature & Date (mm/dd/yyyy)

Signature & Date (mm/dd/yyyy)

Name  
(type  
or  
print)

Title

Name  
(type  
or  
print)

Title



Public reporting burden for this collection of information is estimated to average six (6) hours per initial response, and four (4) hours for updated plans, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget (OMB) control number.

**Purpose of Form:** All applicants for participation in FHA subsidized and unsubsidized multifamily housing programs with five or more units (see 24 CFR 200.615) must complete this Affirmative Fair Housing Marketing Plan (AFHMP) form as specified in 24 CFR 200.625, and in accordance with the requirements in 24 CFR 200.620. The purpose of this AFHMP is to help applicants offer equal housing opportunities regardless of race, color, national origin, religion, sex, familial status, or disability. The AFHMP helps owners/agents (respondents) effectively market the availability of housing opportunities to individuals of both minority and non-minority groups that are least likely to apply for occupancy. Affirmative fair housing marketing and planning should be part of all new construction, substantial rehabilitation, and existing project marketing and advertising activities.

An AFHM program, as specified in this Plan, shall be in effect for each multifamily project throughout the life of the mortgage (24 CFR 200.620(a)). The AFHMP, once approved by HUD, must be made available for public inspection at the sales or rental offices of the respondent (24 CFR 200.625) and may not be revised without HUD approval. This form contains no questions of a confidential nature.

**Applicability:** The form and worksheets must be completed and submitted by all FHA subsidized and unsubsidized multifamily housing program applicants.

#### INSTRUCTIONS:

Send completed form and worksheets to your local HUD Office, Attention: Director, Office of Housing

#### Part 1: Applicant/Respondent and Project

**Identification.** Blocks 1a, 1b, 1c, 1g, 1h, and 1i are self-explanatory.

Block 1d- Respondents may obtain the Census tract number from the U.S. Census Bureau (<http://factfinder2.census.gov/main.html>) when completing Worksheet One.

Block 1e- Respondents should identify both the housing market area and the expanded housing market area for their multifamily housing projects. Use abbreviations if necessary. A **housing market area** is the area from which a multifamily housing project owner/agent may reasonably expect to draw a substantial number of its tenants. This could be a county or Metropolitan Division. The U.S. Census Bureau provides a range of levels to draw from.

An **expanded housing market area** is a larger geographic area, such as a Metropolitan Division or a Metropolitan Statistical Area, which may provide additional demographic diversity in terms of race, color, national origin, religion, sex, familial status, or disability.

Block 1f- The applicant should complete this block only if a Managing Agent (the agent cannot be the applicant) is implementing the AFHMP.

#### Part 2: Type of AFHMP

Block 2a- Respondents should indicate the status of the AFHMP, i.e., initial or updated, as well as the date of the first approved AFHMP. Respondents should also provide the reason (s) for the current update, whether the update is based on the five-year review or due to significant changes in project or local demographics (See instructions for Part 9).

Block 2b- Respondents should identify all groups HUD has approved for occupancy in the subject project, in accordance with the contract, grant, etc.

Block 2c- Respondents should specify the date the project was/will be first occupied.

Block 2d- For new construction and substantial rehabilitation projects, advertising must begin at least 90 days prior to initial occupancy. In the case of existing projects, respondents should indicate whether the advertising will be used to fill existing vacancies, to place individuals on the project's waiting list, or to re-open a closed waiting list. Please indicate how many people are on the waiting list when advertising begins.



### **Part 3 Demographics and Marketing Area.**

"Least likely to apply" means that there is an identifiable presence of a specific demographic group in the housing market area, but members of that group are not likely to apply for the housing without targeted outreach, including marketing materials in other languages for limited English proficient individuals, and alternative formats for persons with disabilities. Reasons for not applying may include, but are not limited to, insufficient information about housing opportunities, language barriers, or transportation impediments.

Block 3a - Using Worksheet 1, the respondent should indicate the demographic composition of the project's residents, current project applicant data, census tract, housing market area, and expanded housing market area. The applicable housing market area and expanded housing market area should be indicated in Block 1e. Compare groups within rows/across columns on Worksheet 1 to identify any under-represented group(s) relative to the surrounding housing market area and expanded housing market area, i.e., those group(s) "least likely to apply" for the housing without targeted outreach and marketing. If there is a particular group or subgroup with members of a protected class that has an identifiable presence in the housing market area, but is not included in Worksheet 1, please specify under "Other."

Respondents should use the most current demographic data from the U.S. Census or another official source such as a local government planning office. Please indicate the source of your data in Part 8 of this form.

Block 3b - Using the information from the completed Worksheet 1, respondents should identify the demographic group(s) least likely to apply for the housing without special outreach efforts by checking all that apply.

### **Part 4 - Marketing Program and Residency Preference (if any).**

Block 4a - A residency preference is a preference for admission of persons who reside or work in a specified geographic area (see 24 CFR 5.655(c)(1)(ii)). Respondents should indicate whether a residency preference is being utilized, and if so, respondents should specify if it is new, revised, or continuing. If a respondent wishes to utilize a residency preference, it must state the preference area (and provide a map delineating the precise area) and state the reason for having such a preference. The respondent must ensure that the preference is in accordance with the non-discrimination and equal opportunity requirements in 24 CFR 5.105(a) (see 24 CFR 5.655(c)(1)).

Respondents should use Worksheet 2 to show how the percentage of the eligible population living or working in the residency preference area compares to that of residents of the project, project applicant data, census tract, housing market area, and expanded housing market area. The percentages would be the same as shown on completed Worksheet 1.

Block 4b - Using Worksheet 3, respondents should describe their use of community contacts to help market the project to those least likely to apply. This table should include the name of a contact person, his/her address, telephone number, previous experience working with the target population(s), the approximate date contact was/will be initiated, and the specific role the community contact will play in assisting with affirmative fair housing marketing or outreach.

Block 4c - Using Worksheet 4, respondents should describe their proposed method(s) of advertising to market to those least likely to apply. This table should identify each media option, the reason for choosing this media, and the language of the advertisement. Alternative format(s) that will be used to reach persons with disabilities, and logo(s) that will appear on the various materials (as well as their size) should be described.

**Please attach a copy of the advertising or marketing material.**

### **Part 5 - Availability of the Fair Housing Poster, AFHMP, and Project Site Sign.**

Block 5a - The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place (24 CFR 200.620(e)). Respondents should indicate all locations where the Fair Housing Poster will be displayed.

Block 5b - The AFHMP must be available for public inspection at the sales or rental office (24 CFR 200.625). Check all of the locations where the AFHMP will be available.

Block 5c - The Project Site Sign must display in a conspicuous position the HUD-approved Equal Housing Opportunity logo, slogan, or statement (24 CFR 200.620(f)). Respondents should indicate where the Project Site Sign will be displayed, as well as the size of the Sign and the size of the logo, slogan, or statement. **Please submit photographs of project site signs.**



## **Part 6 - Evaluation of Marketing Activities.**

Respondents should explain the evaluation process to be used to determine if they have been successful in attracting those individuals identified as least likely to apply. Respondents should also explain how they will make decisions about future marketing activities based on the evaluations.

## **Part 7 - Marketing Staff and Training.**

Block 7a - Respondents should identify staff positions that are/will be responsible for affirmative marketing.

Block 7b - Respondents should indicate whether staff has been trained on the AFHMP and Fair Housing Act.

Please indicate who provides the training and how frequently.

In addition, respondents should specify whether they periodically assess staff members' skills in using the AFHMP and in applying the Fair Housing Act. They should state how often they assess employee skills and how they conduct the assessment.

Block 7c - Respondents should indicate whether staff has been trained on tenant selection in accordance with the project's occupancy policy, including residency preferences (if any). Respondents should also identify those staff positions that are/will be responsible for tenant selection.

Block 7d - Respondents should include copies of any written materials related to staff training, and identify the dates of past and anticipated training.

## **Part 8 - Additional Considerations.**

Respondents should describe their efforts not previously mentioned that were/are planned to attract those individuals least likely to apply for the subject housing.

## **Part 9 - Review and Update.**

By signing the respondent assumes responsibility for implementing the AFHMP. Respondents must review their AFHMP every five years or when the local Community Development jurisdiction's Consolidated Plan is updated, or when there are significant changes in the demographics of the project or the local housing market area. When reviewing the plan, the respondent should consider the current demographics of the housing market area to determine if there have been demographic changes in the population in terms of race, color, national origin, religion, sex, familial status, or disability. The respondent will then determine if the population least likely to apply for the housing is still the population identified in the AFHMP, whether the advertising and publicity cited in the current AFHMP are still appropriate, or whether advertising sources should be modified or expanded. Even if the demographics of the housing market area have not changed, the respondent should determine if the outreach currently being performed is reaching those it is intended to reach as measured by project occupancy and applicant data. If not, the AFHMP should be updated. The revised AFHMP must be submitted to HUD for approval. HUD may review whether the affirmative marketing is actually being performed in accordance with the AFHMP. If based on their review, respondents determine the AFHMP does not need to be revised, they should maintain a file documenting what was reviewed, what was found as a result of the review, and why no changes were required. HUD may review this documentation.

## **Notification of Intent to Begin Marketing.**

No later than 90 days prior to the initiation of rental marketing activities, the respondent must submit notification of intent to begin marketing. The notification is required by the AFHMP Compliance Regulations (24 CFR 108.15). The Notification is submitted to the Office of Housing in the HUD Office servicing the locality in which the proposed housing will be located. Upon receipt of the Notification of Intent to Begin Marketing from the applicant, the monitoring office will review any previously approved plan and may schedule a pre-occupancy conference. Such conference will be held prior to initiation of sales/rental marketing activities. At this conference, the previously approved AFHMP will be reviewed with the applicant to determine if the plan, and/or its proposed implementation, requires modification prior to initiation of marketing in order to achieve the objectives of the AFHM regulation and the plan.

OMB approval of the AFHMP includes approval of this notification procedure as part of the AFHMP. The burden hours for such notification are included in the total designated for this AFHMP form.

**Worksheet 1: Determining Demographic Groups Least Likely to Apply for Housing Opportunities**  
(See AFHMP, Block 3b)

In the respective columns below, indicate the percentage of demographic groups among the project's residents, current project applicant data, census tract, housing market area, and expanded housing market area (See instructions to Block 1e). If you are a new construction or substantial rehabilitation project and do not have residents or project applicant data, only report information for census tract, housing market area, and expanded market area. The purpose of this information is to identify any under-representation of certain demographic groups in terms of race, color, national origin, religion, sex, familial status, or disability. If there is significant under-representation of any demographic group among project residents or current applicants in relation to the housing/expanded housing market area, then targeted outreach and marketing should be directed towards these individuals least likely to apply. Please indicate under-represented groups in Block 3b of the AFHMP. **Please attach maps showing both the housing market area and the expanded housing market area.**

Demographic Characteristics	Project's Residents	Project's Applicant Data	Census Tract	Housing Market Area	Expanded Housing Market Area
% White	4.1%	12.3%	58.3%	50.5%	54.7%
% Black or African American	28.6%	38.7%	5.3%	8.1%	7.0%
% Hispanic or Latino	63.5%	42.3%	32.9%	33.5%	31.4%
% Asian	2.2%	3.3%	1.4%	5.7%	4.7%
% American Indian or Alaskan Native	1.4%	2.1%	0.3%	0.8%	0.8%
% Native Hawaiian or Pacific Islander	0.1%	0.6%	0.0%	0.1%	0.1%
%Persons with Disabilities	16.0%	16.1%	13.1%	14.9%	14.3%
% Families with Children under the age of 18	83.8%	82.0%	20.1%	28.9%	34.7%
Other (specify)					
	NA	NA	NA	NA	NA



**Worksheet 2: Establishing a Residency Preference Area (See AFHMP, Block 4a)**

Complete this Worksheet if you wish to continue, revise, or add a residency preference, which is a preference for admission of persons who reside or work in a specified geographic area (see 24 CFR 5.655(c)(1)(iii)). If a residency preference is utilized, the preference must be in accordance with the non-discrimination and equal opportunity requirements contained in 24 CFR 5.105(a). This Worksheet will help show how the percentage of the population in the residency preference area compares to the demographics of the project's residents, applicant data, census tract, housing market area, and expanded housing market area. **Please attach a map clearly delineating the residency preference geographical area.**

<b>Demographic Characteristics</b>	<b>Project's Residents (as determined in Worksheet 1)</b>	<b>Project's Applicant Data (as determined in Worksheet 1)</b>	<b>Census Tract (as determined in Worksheet 1)</b>	<b>Housing Market Area (as determined in Worksheet 1)</b>	<b>Expanded Housing Market Area (as determined in Worksheet 1)</b>	<b>Residency Preference Area (if applicable)</b>
% White	NA	NA	NA	NA	NA	NA
% Black or African American	NA	NA	NA	NA	NA	NA
% Hispanic or Latino	NA	NA	NA	NA	NA	NA
% Asian	NA	NA	NA	NA	NA	NA
% American Indian or Alaskan Native	NA	NA	NA	NA	NA	NA
% Native Hawaiian or Pacific Islander	NA	NA	NA	NA	NA	NA
% Persons with Disabilities	NA	NA	NA	NA	NA	NA
% Families with Children under the age of 18	NA	NA	NA	NA	NA	NA
Other (specify)	NA	NA	NA	NA	NA	NA

Worksheet 3: Proposed Marketing Activities –Community Contacts (See AFHMP, Block 4b)

For each targeted marketing population designated as least likely to apply in Block 3b, identify at least one community contact organization you will use to facilitate outreach to the particular population group. This could be a social service agency, religious body, advocacy group, community center, etc. State the names of contact persons, their addresses, their telephone numbers, their previous experience working with the target population, the approximate date contact was/will be initiated, and the specific role they will play in assisting with the affirmative fair housing marketing. Please attach additional pages if necessary.

Targeted Population(s)	Community Contact(s), including required information noted above.
White	Travis County Health and Human Services - Palm Square 100 N IH 35 Suite 2000, Austin, TX 78704 (512) 854-4467 Kirsten Siegfried (Division of Family Support Services)
Asian	Asian American Resource Center 8401 Cameron Rd, Austin, TX 78754 (512) 974-1700 Taja Beekley (Facility Manager)
Asian	Asian Family Support Services of Austin PO Box 16254 Austin, TX 78761 (512) 949-5941 Amelia Hetherington



Worksheet 4: Proposed Marketing Activities – Methods of Advertising (See AFHMP, Block 4c)

Complete the following table by identifying your targeted marketing population(s), as indicated in Block 3b, as well as the methods of advertising that will be used to market to that population. For each targeted population, state the means of advertising that you will use as applicable to that group and the reason for choosing this media. In each block, in addition to specifying the media that will be used (e.g., name of newspaper, television station, website, location of bulletin board, etc.) state any language(s) in which the material will be provided, identify any alternative format(s) to be used (e.g. Braille, large print, etc.), and specify the logo(s) (as well as size) that will appear on the various materials. Attach additional pages, if necessary, for further explanation. Please attach a copy of the advertising or marketing material.

Targeted Population(s)→ Methods of Advertising ↓	Targeted Population: White	Targeted Population: Asian	Targeted Population:
Newspaper(s)	Austin American Statesman	Austin South Asian	
Radio Station(s)			
TV Station(s)			
Electronic Media	HACA Website www.hacanet.org Notices in English	HACA Website www.hacanet.org Notices in English	
Bulletin Boards		Asian American Resource Center - Notices in Chinese, Korean, Vietnamese	
Brochures, Notices, Flyers	Property Brochures and Flyers in English	Property Brochures and Flyers in English, Chinese, Korean & Vietnamese	
Other (specify)			

## **ATTACHMENTS TO THE AFFIRMATIVE FAIR HOUSING MARKETING PLAN**

- 1. Housing Market Area Map (Travis County)**  
AFHMP Block 3b. Targeted Marketing Activity  
Worksheet 1 Determining Demographic Groups Least Likely To Apply
- 2. Expanded Housing Market Area Map (Austin – Round Rock MSA)**  
AFHMP Block 3b. Targeted Marketing Activity  
Worksheet 1 Determining Demographic Groups Least Likely To Apply
- 3. Least Likely To Apply Calculator**  
AFHMP Block 3b. Targeted Marketing Activity  
Worksheet 1 Determining Demographic Groups Least Likely To Apply
- 4. Property Sign with Equal Housing Logo**  
AFHMP Block 5c. Project Site Sign
- 5. Housing Authority of the City of Austin HACA Personnel Policy**  
AFHMP Block 7d. Staff Instruction / Training, 1
- 6. HACA ACOP and Tenant Selection Plan – Fair Housing**  
AFHMP Block 7d. Staff Instruction / Training, 1
- 7. HACA SOP – Limited English Proficiency**  
AFHMP Block 7d. Staff Instruction / Training, 2
- 8. HACA SOP - Reasonable Accommodations Procedures and Modifications**  
AFHMP Block 7d. Staff Instruction / Training, 2
- 9. HACA SOP – VAWA**  
AFHMP Block 7d. Staff Instruction / Training, 2
- 10. NAHRO Fair Housing Training Agenda**  
AFHMP Block 7d. Staff Instruction / Training, 6
- 11. Additional Information on Community Contacts**  
AFHMP Worksheet 3 Proposed Marketing Activities – Community Contacts
- 12. Brochures**  
AFHMP Worksheet 4 Proposed Marketing Activities – Methods of Advertising

Note to all applicants/respondents: This form was developed with Nuance, the official HUD software for the creation of HUD forms. HUD has made available instructions for downloading a free installation of a Nuance reader that allows the user to fill-in and save this form in Nuance. Please see <http://portal.hud.gov/hudportal/documents/huddoc?id=nuancereaderinstall.pdf> for the instructions. Using Nuance software is the only means of completing this form.

## Affirmative Fair Housing Marketing Plan (AFHMP) - Multifamily Housing

U.S. Department of Housing  
and Urban Development  
Office of Fair Housing and Equal Opportunity

OMB Approval No. 2529-0013  
(exp.12/31/2016)

### 1a. Project Name & Address (including City, County, State & Zip Code)

Thurmond Heights  
8426 Goldfinch Court  
Austin, Travis County, TX 78758

### 1b. Project Contract Number

TX 001

### 1c. No. of Units

144

### 1d. Census Tract

18.05

### 1e. Housing/Expanded Housing Market Area

Housing Market Area: Travis County  
Expanded Housing Market Area: Round Rock,  
Austin, San Marcos MSA

### 1f. Managing Agent Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address

### 1g. Application/Owner/Developer Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address

Housing Authority of the City of Austin, 1124 S IH 35, Austin, Travis County, TX 78704  
(512) 477-4488 michaelr@hacanet.org

### 1h. Entity Responsible for Marketing (check all that apply)

☒ Owner ☐ Agent ☐ Other (specify) \_\_\_\_\_

Position, Name (if known), Address (including City, County, State & Zip Code), Telephone Number & Email Address

President / CEO, Michael Gerber 1124 S IH 35, Austin, Travis County, TX 78704  
(512) 477-4488 michaelgerber@hacanet.org

### 1i. To whom should approval and other correspondence concerning this AFHMP be sent? Indicate Name, Address (including City, State & Zip Code), Telephone Number & E-Mail Address.

Director of Housing Operations and Policy, Michael Roth, 1124 S IH 35, Austin, Travis County, TX 78704  
(512) 477-4488 michaelr@hacanet.org

### 2a. Affirmative Fair Housing Marketing Plan

Plan Type  Date of the First Approved AFHMP:

Reason(s) for current update:

### 2b. HUD-Approved Occupancy of the Project (check all that apply)

☐ Elderly ☒ Family ☐ Mixed (Elderly/Disabled) ☐ Disabled

### 2c. Date of Initial Occupancy

Property already occupied as part of the Public Housing program. Conversion through RAD to the Project Based Rental Assistance program anticipated to close in September 2017.

### 2d. Advertising Start Date

Advertising must begin *at least* 90 days prior to initial or renewed occupancy for new construction and substantial rehabilitation projects.

Date advertising began or will begin

For existing projects, select below the reason advertising will be used:

To fill existing unit vacancies ☒  
To place applicants on a waiting list ☒ (which currently has  individuals)  
To reopen a closed waiting list ☐ (which currently has  individuals)



**3a. Demographics of Project and Housing Market Area**  
Complete and submit Worksheet 1.

**3b. Targeted Marketing Activity**

Based on your completed Worksheet 1, indicate which demographic group(s) in the housing market area is/are *least* likely to apply for the housing without special outreach efforts. (check all that apply)

- ☒ White ☐ American Indian or Alaska Native ☐ Asian ☐ Black or African American  
☐ Native Hawaiian or Other Pacific Islander ☒ Hispanic or Latino ☐ Persons with Disabilities  
☐ Families with Children ☐ Other ethnic group, religion, etc. (specify)

**4a. Residency Preference**

Is the owner requesting a residency preference? If yes, complete questions 1 through 5.   
If no, proceed to Block 4b.

(1) Type

(2) Is the residency preference area:

The same as the AFHMP housing/expanded housing market area as identified in Block 1e?

The same as the residency preference area of the local PHA in whose jurisdiction the project is located?

(3) What is the geographic area for the residency preference?

(4) What is the reason for having a residency preference?

(5) How do you plan to periodically evaluate your residency preference to ensure that it is in accordance with the non-discrimination and equal opportunity requirements in 24 CFR 5.105(a)?

Complete and submit Worksheet 2 when requesting a residency preference (see also 24 CFR 5.655(c)(1)) for residency preference requirements. The requirements in 24 CFR 5.655(c)(1) will be used by HUD as guidelines for evaluating residency preferences consistent with the applicable HUD program requirements. See also HUD Occupancy Handbook (4350.3) Chapter 4, Section 4.6 for additional guidance on preferences.

**4b. Proposed Marketing Activities: Community Contacts**

Complete and submit Worksheet 3 to describe your use of community contacts to market the project to those least likely to apply.

**4c. Proposed Marketing Activities: Methods of Advertising**

Complete and submit Worksheet 4 to describe your proposed methods of advertising that will be used to market to those least likely to apply. Attach copies of advertisements, radio and television scripts, Internet advertisements, websites, and brochures, etc.

### 5a. Fair Housing Poster

The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place (24 CFR 200.620(e)). Check below all locations where the Poster will be displayed.

☒ Rental Office ☐ Real Estate Office ☐ Model Unit ☒ Other (specify) HACA Administration Building

### 5b. Affirmative Fair Housing Marketing Plan

The AFHMP must be available for public inspection at the sales or rental office (24 CFR 200.625). Check below all locations where the AFHMP will be made available.

☒ Rental Office ☐ Real Estate Office ☐ Model Unit ☒ Other (specify) HACA Administration Building

### 5c. Project Site Sign

Project Site Signs, if any, must display in a conspicuous position the HUD approved Equal Housing Opportunity logo, slogan, or statement (24 CFR 200.620(f)). Check below all locations where the Project Site Sign will be displayed. Please submit photos of Project signs.

☐ Rental Office ☐ Real Estate Office ☐ Model Unit ☒ Entrance to Project ☐ Other (specify)

The size of the Project Site Sign will be 94 Inches x 46 Inches

The Equal Housing Opportunity logo or slogan or statement will be 8.5 Inches x 8 Inches

## 6. Evaluation of Marketing Activities

Explain the evaluation process you will use to determine whether your marketing activities have been successful in attracting individuals least likely to apply, how often you will make this determination, and how you will make decisions about future marketing based on the evaluation process.

At least every 2 years and in conjunction with updates to the local jurisdiction's Consolidation Plan, HACA's Director of Housing Operations and Policy will do the following:

- 1) Review the demographic makeup of the waiting list and the property.
- 2) Compare this with the demographic makeup of the census tract, county and metropolitan statistical area (MSA).
- 3) This review will be compared to the previous review to determine if improvements were made in attracting the least likely to apply.

The marketing plan will be considered successful if there has been an increase in applications received from individuals considered to be the least likely to apply. If there has been an increase, HACA will continue its marketing plan.

If there has not been an increase, HACA will determine what changes can be made to the marketing plan to better reach those least likely to apply.

If there has been a statistically significant change in the community demographics that indicate a different group is the least likely to apply than was previously determined, HACA will modify its marketing plan to incorporate outreach to that community.



**7a. Marketing Staff**

What staff positions are/will be responsible for affirmative marketing?

Director of Housing Operations and Policy  
Director of Admissions  
Communications Manager

**7b. Staff Training and Assessment: AFHMP**

- (1) Has staff been trained on the AFHMP?
- (2) Has staff been instructed in writing and orally on non-discrimination and fair housing policies as required by 24 CFR 200.620(c)?
- (3) If yes, who provides instruction on the AFHMP and Fair Housing Act, and how frequently?

Director of Housing Operations and Policy together with the Compliance Manager / Trainer.  
Instruction is offered on a quarterly basis as part of staff meetings. In addition, staff receive fair housing training as part of their PHM / COS training, attend the City of Austin Fair Housing Conference every April and other occasional trainings.

- (4) Do you periodically assess staff skills on the use of the AFHMP and the application of the Fair Housing Act?
- (5) If yes, how and how often?

Assessment of staff knowledge and skills is done at the staff meetings by means of quizzes, situational role plays, etc. In addition, we provide focused follow up after any fair housing complaint (substantiated or not).

**7c. Tenant Selection Training/Staff**

- (1) Has staff been trained on tenant selection in accordance with the project's occupancy policy, including any residency preferences?
- (2) What staff positions are/will be responsible for tenant selection?

Admissions Director and Admissions Manager

**7d. Staff Instruction/Training:**

Describe AFHM/Fair Housing Act staff training, already provided or to be provided, to whom it was/will be provided, content of training, and the dates of past and anticipated training. Please include copies of any AFHM/Fair Housing staff training materials.

1. At new hire, staff receives an introduction to Non-Discrimination and Fair Housing. Staff reviews the non-discrimination policies in our personnel handbook, the Fair Housing policies in our Admissions and Continued Occupancy Policy and the Fair Housing Policies in our Tenant Selection Plan. (See Attached)
2. All staff is trained on Reasonable Accommodations, VAWA and Limited English Proficiency SOPs (See Attached SOPs).
3. Annually (in November) all staff receive Ethics training from our legal counsel. Fair housing and non-discrimination are covered in this training. Recent Ethics Training also focused on the new proposed rule for Quid Pro Quo and Harassment.
4. All property managers are required to complete their PHM or COS certification. As part of both training programs, there is a Fair Housing component.
5. Annually (in April) the City of Austin puts on a Fair Housing Seminar which is attended by property management staff.
6. In 2016, all property management staff completed the certification for Fair Housing and Reasonable Accommodations offered by NAHRO. (See attached curriculum)
7. On a quarterly basis as part of managers' meetings, we have a Fair Housing Training / Review component designed to test our staff's knowledge and to provide additional training / review.

**8. Additional Considerations** Is there anything else you would like to tell us about your AFHMP to help ensure that your program is marketed to those least likely to apply for housing in your project? Please attach additional sheets, as needed.

The Housing Authority of the City of Austin (HACA) has a preference for families with a disabled head of household, spouse or co-head. During the 2015 calendar year, 68% of the names drawn off the waiting list were disabled families. During the same calendar year, 21% of the new applications received were from disabled families. The end result is that you will see a low number of disabled families on our waiting list (4.7%), however we do not feel this group is in the "least likely to apply" category.

HACA is committed to fulfill both the letter and the intent of the Fair Housing Act. HACA understands and embraces its responsibility to affirmatively further fair housing. HACA commits to exceed the requirements of this marketing plan in order to serve populations in Austin and Central Texas who are diverse, of low income and of the highest needs. A commitment to compliance and enforcement of the basic requirements are also extended to employment within HACA and are incorporated into all aspects of our training programs.

**9. Review and Update**

By signing this form, the applicant/respondent agrees to implement its AFHMP, and to review and update its AFHMP in accordance with the instructions to item 9 of this form in order to ensure continued compliance with HUD's Affirmative Fair Housing Marketing Regulations (see 24 CFR Part 200, Subpart M). 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. (See 18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Signature of person submitting this Plan & Date of Submission (mm/dd/yyyy)

Name (type or print)

Michael Gerber

Title & Name of Company

President & CEO, Housing Authority of the City of Austin

**For HUD-Office of Housing Use Only**

Reviewing Official:

**For HUD-Office of Fair Housing and Equal Opportunity Use Only**

☐ Approval

☐ Disapproval

Signature & Date (mm/dd/yyyy)

Name  
(type  
or  
print)

Title

Signature & Date (mm/dd/yyyy)

Name  
(type  
or  
print)

Title



Public reporting burden for this collection of information is estimated to average six (6) hours per initial response, and four (4) hours for updated plans, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget (OMB) control number.

**Purpose of Form:** All applicants for participation in FHA subsidized and unsubsidized multifamily housing programs with five or more units (see 24 CFR 200.615) must complete this Affirmative Fair Housing Marketing Plan (AFHMP) form as specified in 24 CFR 200.625, and in accordance with the requirements in 24 CFR 200.620. The purpose of this AFHMP is to help applicants offer equal housing opportunities regardless of race, color, national origin, religion, sex, familial status, or disability. The AFHMP helps owners/agents (respondents) effectively market the availability of housing opportunities to individuals of both minority and non-minority groups that are least likely to apply for occupancy. Affirmative fair housing marketing and planning should be part of all new construction, substantial rehabilitation, and existing project marketing and advertising activities.

An AFHM program, as specified in this Plan, shall be in effect for each multifamily project throughout the life of the mortgage (24 CFR 200.620(a)). The AFHMP, once approved by HUD, must be made available for public inspection at the sales or rental offices of the respondent (24 CFR 200.625) and may not be revised without HUD approval. This form contains no questions of a confidential nature.

**Applicability:** The form and worksheets must be completed and submitted by all FHA subsidized and unsubsidized multifamily housing program applicants.

#### INSTRUCTIONS:

Send completed form and worksheets to your local HUD Office, Attention: Director, Office of Housing

#### Part 1: Applicant/Respondent and Project

**Identification.** Blocks 1a, 1b, 1c, 1g, 1h, and 1i are self-explanatory.

Block 1d- Respondents may obtain the Census tract number from the U.S. Census Bureau (<http://factfinder2.census.gov/main.html>) when completing Worksheet One.

Block 1e- Respondents should identify both the housing market area and the expanded housing market area for their multifamily housing projects. Use abbreviations if necessary. A **housing market area** is the area from which a multifamily housing project owner/agent may reasonably expect to draw a substantial number of its tenants. This could be a county or Metropolitan Division. The U.S. Census Bureau provides a range of levels to draw from.

An **expanded housing market area** is a larger geographic area, such as a Metropolitan Division or a Metropolitan Statistical Area, which may provide additional demographic diversity in terms of race, color, national origin, religion, sex, familial status, or disability.

Block 1f- The applicant should complete this block only if a Managing Agent (the agent cannot be the applicant) is implementing the AFHMP.

#### Part 2: Type of AFHMP

Block 2a- Respondents should indicate the status of the AFHMP, i.e., initial or updated, as well as the date of the first approved AFHMP. Respondents should also provide the reason (s) for the current update, whether the update is based on the five-year review or due to significant changes in project or local demographics (See instructions for Part 9).

Block 2b- Respondents should identify all groups HUD has approved for occupancy in the subject project, in accordance with the contract, grant, etc.

Block 2c- Respondents should specify the date the project was/will be first occupied.

Block 2d- For new construction and substantial rehabilitation projects, advertising must begin at least 90 days prior to initial occupancy. In the case of existing projects, respondents should indicate whether the advertising will be used to fill existing vacancies, to place individuals on the project's waiting list, or to re-open a closed waiting list. Please indicate how many people are on the waiting list when advertising begins.



### **Part 3 Demographics and Marketing Area.**

"Least likely to apply" means that there is an identifiable presence of a specific demographic group in the housing market area, but members of that group are not likely to apply for the housing without targeted outreach, including marketing materials in other languages for limited English proficient individuals, and alternative formats for persons with disabilities. Reasons for not applying may include, but are not limited to, insufficient information about housing opportunities, language barriers, or transportation impediments.

Block 3a - Using Worksheet 1, the respondent should indicate the demographic composition of the project's residents, current project applicant data, census tract, housing market area, and expanded housing market area. The applicable housing market area and expanded housing market area should be indicated in Block 1e. Compare groups within rows/across columns on Worksheet 1 to identify any under-represented group(s) relative to the surrounding housing market area and expanded housing market area, i.e., those group(s) "least likely to apply" for the housing without targeted outreach and marketing. If there is a particular group or subgroup with members of a protected class that has an identifiable presence in the housing market area, but is not included in Worksheet 1, please specify under "Other."

Respondents should use the most current demographic data from the U.S. Census or another official source such as a local government planning office. Please indicate the source of your data in Part 8 of this form.

Block 3b - Using the information from the completed Worksheet 1, respondents should identify the demographic group(s) least likely to apply for the housing without special outreach efforts by checking all that apply.

### **Part 4 - Marketing Program and Residency Preference (if any).**

Block 4a - A residency preference is a preference for admission of persons who reside or work in a specified geographic area (see 24 CFR 5.655(c)(1)(ii)). Respondents should indicate whether a residency preference is being utilized, and if so, respondents should specify if it is new, revised, or continuing. If a respondent wishes to utilize a residency preference, it must state the preference area (and provide a map delineating the precise area) and state the reason for having such a preference. The respondent must ensure that the preference is in accordance with the non-discrimination and equal opportunity requirements in 24 CFR 5.105(a) (see 24 CFR 5.655(c)(1)).

Respondents should use Worksheet 2 to show how the percentage of the eligible population living or working in the residency preference area compares to that of residents of the project, project applicant data, census tract, housing market area, and expanded housing market area. The percentages would be the same as shown on completed Worksheet 1.

Block 4b - Using Worksheet 3, respondents should describe their use of community contacts to help market the project to those least likely to apply. This table should include the name of a contact person, his/her address, telephone number, previous experience working with the target population(s), the approximate date contact was/will be initiated, and the specific role the community contact will play in assisting with affirmative fair housing marketing or outreach.

Block 4c - Using Worksheet 4, respondents should describe their proposed method(s) of advertising to market to those least likely to apply. This table should identify each media option, the reason for choosing this media, and the language of the advertisement. Alternative format(s) that will be used to reach persons with disabilities, and logo(s) that will appear on the various materials (as well as their size) should be described.

**Please attach a copy of the advertising or marketing material.**

### **Part 5 – Availability of the Fair Housing Poster, AFHMP, and Project Site Sign.**

Block 5a - The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place (24 CFR 200.620(e)). Respondents should indicate all locations where the Fair Housing Poster will be displayed.

Block 5b -The AFHMP must be available for public inspection at the sales or rental office (24 CFR 200.625). Check all of the locations where the AFHMP will be available.

Block 5c -The Project Site Sign must display in a conspicuous position the HUD-approved Equal Housing Opportunity logo, slogan, or statement (24 CFR 200.620(f)). Respondents should indicate where the Project Site Sign will be displayed, as well as the size of the Sign and the size of the logo, slogan, or statement. **Please submit photographs of project site signs.**



## **Part 6 - Evaluation of Marketing Activities.**

Respondents should explain the evaluation process to be used to determine if they have been successful in attracting those individuals identified as least likely to apply. Respondents should also explain how they will make decisions about future marketing activities based on the evaluations.

## **Part 7 - Marketing Staff and Training.**

Block 7a - Respondents should identify staff positions that are/will be responsible for affirmative marketing.

Block 7b - Respondents should indicate whether staff has been trained on the AFHMP and Fair Housing Act.

Please indicate who provides the training and how frequently. In addition, respondents should specify whether they periodically assess staff members' skills in using the AFHMP and in applying the Fair Housing Act. They should state how often they assess employee skills and how they conduct the assessment.

Block 7c - Respondents should indicate whether staff has been trained on tenant selection in accordance with the project's occupancy policy, including residency preferences (if any). Respondents should also identify those staff positions that are/will be responsible for tenant selection.

Block 7d - Respondents should include copies of any written materials related to staff training, and identify the dates of past and anticipated training.

## **Part 8 - Additional Considerations.**

Respondents should describe their efforts not previously mentioned that were/are planned to attract those individuals least likely to apply for the subject housing.

## **Part 9 - Review and Update.**

By signing the respondent assumes responsibility for implementing the AFHMP. Respondents must review their AFHMP every five years or when the local Community Development jurisdiction's Consolidated Plan is updated, or when there are significant changes in the demographics of the project or the local housing market area. When reviewing the plan, the respondent should consider the current demographics of the housing market area to determine if there have been demographic changes in the population in terms of race, color, national origin, religion, sex, familial status, or disability. The respondent will then determine if the population least likely to apply for the housing is still the population identified in the AFHMP, whether the advertising and publicity cited in the current AFHMP are still appropriate, or whether advertising sources should be modified or expanded. Even if the demographics of the housing market area have not changed, the respondent should determine if the outreach currently being performed is reaching those it is intended to reach as measured by project occupancy and applicant data. If not, the AFHMP should be updated. The revised AFHMP must be submitted to HUD for approval. HUD may review whether the affirmative marketing is actually being performed in accordance with the AFHMP. If based on their review, respondents determine the AFHMP does not need to be revised, they should maintain a file documenting what was reviewed, what was found as a result of the review, and why no changes were required. HUD may review this documentation.

## **Notification of Intent to Begin Marketing.**

No later than 90 days prior to the initiation of rental marketing activities, the respondent must submit notification of intent to begin marketing. The notification is required by the AFHMP Compliance Regulations (24 CFR 108.15). The Notification is submitted to the Office of Housing in the HUD Office servicing the locality in which the proposed housing will be located. Upon receipt of the Notification of Intent to Begin Marketing from the applicant, the monitoring office will review any previously approved plan and may schedule a pre-occupancy conference. Such conference will be held prior to initiation of sales/rental marketing activities. At this conference, the previously approved AFHMP will be reviewed with the applicant to determine if the plan, and/or its proposed implementation, requires modification prior to initiation of marketing in order to achieve the objectives of the AFHM regulation and the plan.

OMB approval of the AFHMP includes approval of this notification procedure as part of the AFHMP. The burden hours for such notification are included in the total designated for this AFHMP form.



**Worksheet 1: Determining Demographic Groups Least Likely to Apply for Housing Opportunities**  
**(See AFHMP, Block 3b)**

In the respective columns below, indicate the percentage of demographic groups among the project's residents, current project applicant data, census tract, housing market area, and expanded housing market area (See instructions to Block 1e). If you are a new construction or substantial rehabilitation project and do not have residents or project applicant data, only report information for census tract, housing market area, and expanded market area. The purpose of this information is to identify any under-representation of certain demographic groups in terms of race, color, national origin, religion, sex, familial status, or disability. If there is significant under-representation of any demographic group among project residents or current applicants in relation to the housing/expanded housing market area, then targeted outreach and marketing should be directed towards these individuals least likely to apply. Please indicate under-represented groups in Block 3b of the AFHMP. **Please attach maps showing both the housing market area and the expanded housing market area.**

Demographic Characteristics	Project's Residents	Project's Applicant Data	Census Tract	Housing Market Area	Expanded Housing Market Area
% White	12.1%	15.3%	19.1%	50.5%	54.7%
% Black or African American	35.8%	47.2%	6.1%	8.1%	7.0%
% Hispanic or Latino	46.7%	31.7%	71.4%	33.5%	31.4%
% Asian	5.4%	3.4%	2.1%	5.7%	4.7%
% American Indian or Alaskan Native	0.0%	1.3%	0.1%	0.8%	0.8%
% Native Hawaiian or Pacific Islander	0.0%	0.3%	0.0%	0.1%	0.1%
% Persons with Disabilities	37.1%	26.9%	17.5%	14.9%	14.3%
% Families with Children under the age of 18	42.3%	53.4%	38.2%	28.9%	34.7%
Other (specify)					
	NA	NA	NA	NA	NA

**Worksheet 2: Establishing a Residency Preference Area (See AFHMP, Block 4a)**

Complete this Worksheet if you wish to continue, revise, or add a residency preference, which is a preference for admission of persons who reside or work in a specified geographic area (see 24 CFR 5.655(c)(1)(ii)). If a residency preference is utilized, the preference must be in accordance with the non-discrimination and equal opportunity requirements contained in 24 CFR 5.105(a). This Worksheet will help show how the percentage of the population in the residency preference area compares to the demographics of the project's residents, applicant data, census tract, housing market area, and expanded housing market area. **Please attach a map clearly delineating the residency preference geographical area.**

<b>Demographic Characteristics</b>	<b>Project's Residents (as determined in Worksheet 1)</b>	<b>Project's Applicant Data (as determined in Worksheet 1)</b>	<b>Census Tract (as determined in Worksheet 1)</b>	<b>Housing Market Area (as determined in Worksheet 1)</b>	<b>Expanded Housing Market Area (as determined in Worksheet 1)</b>	<b>Residency Preference Area (if applicable)</b>
% White	NA	NA	NA	NA	NA	NA
% Black or African American	NA	NA	NA	NA	NA	NA
% Hispanic or Latino	NA	NA	NA	NA	NA	NA
% Asian	NA	NA	NA	NA	NA	NA
% American Indian or Alaskan Native	NA	NA	NA	NA	NA	NA
% Native Hawaiian or Pacific Islander	NA	NA	NA	NA	NA	NA
% Persons with Disabilities	NA	NA	NA	NA	NA	NA
% Families with Children under the age of 18	NA	NA	NA	NA	NA	NA
Other (specify)	NA	NA	NA	NA	NA	NA

**Worksheet 3: Proposed Marketing Activities –Community Contacts (See AFHMP, Block 4b)**

For each targeted marketing population designated as least likely to apply in Block 3b, identify at least one community contact organization you will use to facilitate outreach to the particular population group. This could be a social service agency, religious body, advocacy group, community center, etc. State the names of contact persons, their addresses, their telephone numbers, their previous experience working with the target population, the approximate date contact was/will be initiated, and the specific role they will play in assisting with the affirmative fair housing marketing. Please attach additional pages if necessary.

Targeted Population(s)	Community Contact(s), including required information noted above.
White	Travis County Health and Human Services - Palm Square 100 N IH 35 Suite 2000, Austin, TX 78704 (512) 854-4467 Kirsten Siegfried (Division of Family Support Services)
Hispanic	Casa Marianella 821 Gunter St, Austin, TX 78702 (512) 385-5571 Erin Edmondson
Hispanic	St. Johns Community Center 7500 Blessing Ave, Austin, TX 78752 (512) 972-5139 Mona Allen (Manager)

Worksheet 4: Proposed Marketing Activities – Methods of Advertising (See AFHMP, Block 4c)

Complete the following table by identifying your targeted marketing population(s), as indicated in Block 3b, as well as the methods of advertising that will be used to market to that population. For each targeted population, state the means of advertising that you will use as applicable to that group and the reason for choosing this media. In each block, in addition to specifying the media that will be used (e.g., name of newspaper, television station, website, location of bulletin board, etc.) state any language(s) in which the material will be provided, identify any alternative format(s) to be used (e.g. Braille, large print, etc.), and specify the logo(s) (as well as size) that will appear on the various materials. Attach additional pages, if necessary, for further explanation. Please attach a copy of the advertising or marketing material.

Targeted Population(s)→ Methods of Advertising ↓	Targeted Population: White	Targeted Population: Hispanic	Targeted Population:
<b>Newspaper(s)</b>	Austin American Statesman	Ahora Si El Mundo	
<b>Radio Station(s)</b>			
<b>TV Station(s)</b>			
<b>Electronic Media</b>	HACA Website www.hacanet.org Notices in English	HACA Website www.hacanet.org Notices in English & Spanish	
<b>Bulletin Boards</b>			
<b>Brochures, Notices, Flyers</b>	Property Brochures and Flyers in English	Property Brochures and Flyers in English & Spanish	
<b>Other (specify)</b>			



## **ATTACHMENTS TO THE AFFIRMATIVE FAIR HOUSING MARKETING PLAN**

**1. Housing Market Area Map (Travis County)**

AFHMP Block 3b. Targeted Marketing Activity

Worksheet 1 Determining Demographic Groups Least Likely To Apply

**2. Expanded Housing Market Area Map (Austin – Round Rock MSA)**

AFHMP Block 3b. Targeted Marketing Activity

Worksheet 1 Determining Demographic Groups Least Likely To Apply

**3. Least Likely To Apply Calculator**

AFHMP Block 3b. Targeted Marketing Activity

Worksheet 1 Determining Demographic Groups Least Likely To Apply

**4. Property Sign with Equal Housing Logo**

AFHMP Block 5c. Project Site Sign

**5. Housing Authority of the City of Austin HACA Personnel Policy**

AFHMP Block 7d. Staff Instruction / Training, 1

**6. HACA ACOP and Tenant Selection Plan – Fair Housing**

AFHMP Block 7d. Staff Instruction / Training, 1

**7. HACA SOP – Limited English Proficiency**

AFHMP Block 7d. Staff Instruction / Training, 2

**8. HACA SOP - Reasonable Accommodations Procedures and Modifications**

AFHMP Block 7d. Staff Instruction / Training, 2

**9. HACA SOP – VAWA**

AFHMP Block 7d. Staff Instruction / Training, 2

**10. NAHRO Fair Housing Training Agenda**

AFHMP Block 7d. Staff Instruction / Training, 6

**11. Additional Information on Community Contacts**

AFHMP Worksheet 3 Proposed Marketing Activities – Community Contacts

**12. Brochures**

AFHMP Worksheet 4 Proposed Marketing Activities – Methods of Advertising



**HOUSING AUTHORITY OF THE CITY OF AUSTIN  
BOARD OF COMMISSIONERS  
REGULAR BOARD MEETING**

**AGENDA ITEM NO. 1E**

**Presentation, Discussion and Possible Action of Resolution  
No. 2495: Approval of a Contract for Thurmond Heights  
Site Lighting Renovations**

**HOUSING AUTHORITY OF THE CITY OF AUSTIN**  
**BOARD ACTION REQUEST**  
**RESOLUTION NO. 2495**  
**PLANNING AND DEVELOPMENT DEPARTMENT**

**MEETING DATE:** April 20, 2017

**STAFF CONTACT:** James Teasdale, Planning and Development Director

**ITEM TITLE:** Discussion and Adoption of Resolution No. 2495: Approving the Award of Contract for Site Lighting Renovation at AMP 11/TX1-11 Thurmond Heights Apartments

**BUDGETED ITEM:** Yes

**TOTAL COST:** \$163,770.00

**ACTION**

Motion to Approve Resolution No. 2495: Authorizing the Housing Authority of the City of Austin Award of a Contract to Merrigan Electric, LLC

**SUMMARY**

*General Information:* This award is to approve a contract for work that will remove seven (7) existing non-working light poles, approximately 8' tall, installed at each parking area entry, and replace them with new photocell -activated LED light fixtures on new poles. Each of these locations must be wired back to a nearby Unit building by trenching, and have a new COA/Austin Energy power panel and meter, where none had been previously. Additionally, along the western property line and creek area, six (6) more of the same new light poles will be installed, where none were before, also with new wiring, trenched back to nearby unit buildings where new power panels and meters will be installed in order to energize the new fixtures. Creekside pole light locations will receive a new 10' lamp pole, with a new LED fixture mounted on top. Light poles will receive shoebox fixtures, reflecting a more commercial style of modern property lighting. Lights will be oriented to spread light out to the grounds and not to the sky. Existing Wall-Pack fixtures, mounted on the Community/Management building, will be upgraded to LED, providing approximately twice the light as current fixtures. Two additional Wall-Pack lights will be provided on this building, where little to no lighting currently exists. The existing single light pole at the end of the private drive, Meadowlark St., will be fitted with new LED fixtures, as well. The new LED light fixtures will provide approximately 3 times the lighting lumens of other lighting types, last longer than typical bulbs/fixtures, and be more efficient to operate.

**EXHIBITS**

Exhibit 1: Bid Process

Exhibit 2: Reference Verification

**BID PROCESS:** The Invitation for Bid was advertised in *The Austin American Statesman* on Sunday, February 5, 2017, and again on Sunday, February 12, 2017, and faxed Friday, February 3, 2017 to the minority/small business organizations designated in the HACA Procurement Policy. The Invitation for Bid/Rebid was advertised in *The Austin American Statesman* on Sunday, March 19, 2017, and again on Sunday, March 26, 2017, and faxed Monday, March 20, 2017 to the minority/small business organizations designated in the HACA Procurement Policy.

Eleven (11) Project Manuals were distributed and Two (2) Bid Proposals were submitted. Sealed bids were received, opened and read aloud on April 7, 2017 at 2:00 p.m., local time.

Plan Holder	Bid Amount	MBE/WBE
Virtual Builders Exchange 4047 Naco-Perrin Suite 100 San Antonio, TX 78217 210-564-6900; Contact: Heather Hope	<u>NO BID RECEIVED</u>	NO
McGraw Hill Construction Dodge Reports 4300 Beltway Place Suite 180 Arlington, TX 76018 817-375-2955; Contact: Plan Center/Kirstin Klutch	<u>NO BID RECEIVED</u>	NO
Reed Construction Data 30 Technology Parkway South Suite 500 Norcross, GA 30092-2912 800-876-4045; Contact: Document Processing Center	<u>NO BID RECEIVED</u>	NO
Associated General Contractors of America San Antonio Chapter 10806 Gulfdale San Antonio, TX 78216 210-349-4921; Contact: Mary Lugo/Dana Marsh	<u>NO BID RECEIVED</u>	NO
Construction Data-CDC-News 4201 West Parmer Lane Bldg. # Suite 200 Austin, TX 78727 800-872-7878; Contact: Plan Room Center/Toni Lawson	<u>NO BID RECEIVED</u>	NO
AGC Austin 609 South Lamar Austin, TX 78704 512-804-2796; Contact: Toni Osberry	<u>NO BID RECEIVED</u>	NO
CMD 333 E. Butterfield Road, Suite 600 Lombard, IL 60148 630-258-7983; Contact: Sherwin De Peralta/Fonda Rosenfeldt	<u>NO BID RECEIVED</u>	NO

iSqFt Plan Room 4500 Lake Forest Drive, Suite 502 Cincinnati, OH 45242 1-800-364-2059, ext 702; Contact: Kyle Bellomy	<u><b>NO BID RECEIVED</b></u>	NO
Merrigan Electric, LLC 706 Riva Ridge Drive Leander, TX 78641 512-944-3217; Contact: Christine or Chad Merrigan	<u><b>\$163,770.00</b></u>  Completion Time: 83 Calendar Days	WBE
Unity Contractor Services, Inc. 6448 East Highway 290, Suite 113 Austin, TX 78723 512-926-8065; Contact: Samantha House/Patrick Carter	<u><b>\$204,000.00</b></u>  Completion Time: 90 Calendar Days	MBE
HD Supply 3100 Cumberland Blvd SE Atlanta, GA 30339 540-718-8839; Contact: Jim Weaver	<u><b>NO BID RECEIVED</b></u>	NO

- **AWARD OF CONTRACT:** Bids were opened and read aloud by James Teasdale, Planning & Development Director, recorded by Christina Huerta, Modernization Specialist and witnessed by Vince Shaw, Architect, Place Designers, Inc.
- Bidder, was determined to be responsive – Bid Proposal, Non-Collusive Affidavit, Representations, Certifications, and Other Statements of Bidders, Certification of Bidder Regarding Equal Employment Opportunity, and Contractor's Qualification Statement, Section 3 Certification were complete & executed, as required.
- Reference verifications were performed, with all positive results. Prior performance for HACA was satisfactory.

**REFERENCE VERIFICATION:**

COMPANY: Merrigan Electric, LLC

PROJECT: **#2017-01- Thurmond Heights Site Lighting Renovation**

**Source:**

1. Lakeway Municipal Utility District Program - Phone: 512-658-7157  
Contact: Mr. John Hastings in the amount of approximately \$70K+.

**Comments:**

Merrigan has performed several projects and jobs for us from replacing large wire, 200 HP motors to emergency lighting and new conduit systems and obstruction lighting. We have been working with Merrigan about 2/3 years. Handled administrative duties with no problems. No problems with change orders, work performance or quality of work. Very pleased with Merrigan on every level. Would absolutely work with contractor again.

2. Manville Water Supply - Phone: 979-775-0200  
Contact: Mr. Ed Wilkerson (General Contractor) - in the amount of approximately \$84K+.

**Comments:**

Merrigan was a subcontractor for our company Water Treatment Construction Company on a project consisting of electrical & controls installation on a booster pump control panel that was built and installed. We have worked with Merrigan on only this one project. Administrative duties were handled well. They were professional. No significant change order request. Performance and quality of work was good. Crew worked well with all involved. No problems. Timely start and completion of work. No safety issues on project/jobsite. Would work with Merrigan again.

3. Brushy Creek Regional Utility Authority – Phone: 210-340-9998  
Contact: Mr. Sam Montoya (General Contractor) - in the amount of approximately \$118K+

**Comments:**

Merrigan was a subcontractor for our company S.J. Louis on a project consisting of electrical modifications and installation of electrical instrumentation for a new water distribution center and SCADA system. Worked with Merrigan on only this project thus far which ended summer 2012. Administrative duties were great consisting of submittals, manuals etc. They were professional. No significant change order requests. All requests were per owner. Performance and quality of work was great. Crew worked well with all involved. No problems. Great communication between both contractors despite the difficulty of the owner. Timely start and completion of work. No safety issues on project/jobsite. Merrigan was above standard all aspects of the project and very reliable Would absolutely work with Merrigan again.

4. Housing Authority of the City of Austin - Phone 512-477-4488 Extension 1124  
Contact: Mr. James Teasdale in the amount of approximately \$242K+.

**Comments:**

Past performance with housing authority very satisfactory. Projects completed for the authority includes, but not limited to:

Electrical Upgrades-Lakeside

LED Security Lighting Upgrades-Lakeside

GFCI Upgrades-Northloop



**RESOLUTION NO. 2495**  
**Approving the Award of Contract for Site Lighting Renovation  
at AMP 11/TX1-11 Thurmond Heights Apartments**

**WHEREAS,** ...April 7, 2017, the Housing Authority opened and publicly read bids for Site Lighting Renovation at AMP 11/TX1-11 Thurmond Heights Apartments;

**WHEREAS,** ... it is the recommendation of the President & CEO that the bid submitted by Merrigan Electric, LLC in the amount of \$163,770.00 be accepted as the most responsible and responsive bid;

**Now, therefore, it is hereby**

**RESOLVED,** ... Housing Authority of the City of Austin Board of Commissioners authorizes the President & CEO to accept the bid as submitted by Merrigan Electric, LLC and award such contract this 20<sup>th</sup> day of April 2017.

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**Michael G. Gerber, Secretary**

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**Carl S. Richie, Jr., Chairperson**

**HOUSING AUTHORITY OF THE CITY OF AUSTIN  
BOARD OF COMMISSIONERS  
REGULAR BOARD MEETING**

**ACTION ITEMS**

**AGENDA ITEM NO. 2**

**Presentation, Discussion and Possible Action regarding Resolution No 2492: Authorizing HACA to Project-base up to 25 Veterans Affairs Supportive Housing (VASH) Vouchers to Elysium Grand and Wheles Manor Apartment DeLoach Property Interest in response to a Request for Proposal issued on February 13, 2017**

**HOUSING AUTHORITY OF THE CITY OF AUSTIN**

**BOARD ACTION REQUEST**

**RESOLUTION NO. 2492**

**ASSISTED HOUSING**

**MEETING DATE:** April 20, 2017

**STAFF CONTACT:** Lisa Garcia, Vice President of Assisted Housing

**ITEM TITLE:** Presentation, Discussion and Possible Action regarding Resolution No 2492: Authorizing HACA to Project-base up to 25 Veterans Affairs Supportive Housing (VASH) Vouchers to Elysium Grand and Wheless Manor Apartment DeLoach Property Interest in response to a Request for Proposal issued on February 13, 2017

**BUDGETED ITEM:** N/A

**TOTAL COST:** N/A

**ACTION**

Motion to Approve Resolution No. 2492 authorizing HACA to enter into an agreement to enter into a Housing Assistance Payments (HAP) Contract to project-base up to 25 Veterans Affairs Supportive Housing (VASH) vouchers with Elysium Grand and Wheless Manor Apartment DeLoach Property Interest in response to a Request for Proposals issued on February 13, 2017

**SUMMARY**

On November 14, 2016, the Housing Authority of the City of Austin (HACA) was awarded 75 Project-based HUD Veteran Affairs Supportive Housing (VASH) Vouchers which combines rental assistance from HUD with case management and clinical services provided by the Veterans Affairs (VA). The Housing Authority issued a Request for Proposals on November 20, 2016 soliciting proposals from developers/owners to provide rental units under the Project-based VASH program. HACA received one proposal from Austin Travis County Integral Care and awarded 25 project-based VASH vouchers to ATCIC.

On February 13, 2017, HACA issued a Request for Proposals seeking additional submissions to utilize the remaining 50 Project-based VASH Vouchers. Three proposals were received from Elysium Grand, Wheless Manor Apartment DeLoach Property Interests, and Heroes Lodge. The Department of Veterans Affairs provided letters of support for all three projects. The proposals were reviewed by Sylvia, Blanco, Lisa Garcia, Ron Kowal, Dylan Shubitz and Elvira Lathrop. Elysium Grand and Wheless Manor Apartment DeLoach Property Interests received the highest scores. The evaluation criteria was based on a described supportive services plan; financial feasibility; previous development and property management experience; project design; commitment to serve homeless and chronic homeless veterans; if property is located in a high opportunity area; and the projects readiness. The evaluation committee recommended awarding VASH project-based vouchers to Elysium Grand and Wheless Manor. Elysium Grand is an 80 unit affordable housing development located at 3300 Oak Creek Drive in northwest Austin. Wheless Manor is an existing 32 unit property located at 1512 Wheless Lane, Austin, TX.

**RESOLUTION NO. 2492**

**Authorizing HACA to Project-base up to 25 Veterans Affairs Supportive Housing (VASH) Vouchers to Elysium Grand and Wheles Manor Apartment DeLoach Property Interest in response to a Request for Proposal issued on February 13, 2017**

**WHEREAS**, on November 14, 2016, the Housing Authority of the City of Austin (HACA) was awarded 75 Project-based HUD Veteran Affairs Supportive Housing (VASH) Vouchers which combines rental assistance from HUD with case management and clinical services provided by Veterans Affairs (VA);

**WHEREAS**, the Housing Authority issued a Request for Proposal on February 13, 2017 soliciting proposals from developers/owners to provide rental units under the Project-based Veterans Affairs Supportive Housing (VASH) program; and

**WHEREAS**, Elysium Grand, Wheles Manor Apartment DeLoach Property Interests and Heroes Lodge submitted proposals requesting Project-based VASH vouchers for their affordable housing projects.

**WHEREAS**, it is the recommendation of the President & CEO for the Housing Authority of the City of Austin to enter into an agreement to enter into a Housing Assistance Payments (HAP) Contract with Elysium Grand to project-base up to 25 Veterans Affairs Supportive Housing (VASH) vouchers and to enter into an agreement to enter into a Housing Assistance Payments (HAP) Contract with Wheles Manor Apartment DeLoach Property Interests to project-base up to 25 Veterans Affairs Supportive Housing (VASH) vouchers .

**Now, therefore, it is hereby**

**RESOLVED**, that the Housing Authority of the City of Austin's Board of Commissioners authorizes HACA to enter into an agreement to enter into a Housing Assistance Payments (HAP) Contract with Elysium Grand to project-base up to 25 Veterans Affairs Supportive Housing (VASH) vouchers and to enter into an agreement to enter into a Housing Assistance Payments (HAP) Contract with Wheles Manor Apartment DeLoach Property Interest to project-base up to 25 Veterans Affairs Supportive Housing (VASH) vouchers.

Passed this 20<sup>th</sup> day of April, 2017.

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**Michael G. Gerber, Secretary**

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**Carl S. Richie, Jr., Chairperson**

**HOUSING AUTHORITY OF THE CITY OF AUSTIN  
BOARD OF COMMISSIONERS  
REGULAR BOARD MEETING**

**AGENDA ITEM NO. 3**

**Presentation, Discussion and Possible Action of Resolution  
No. 2496: Authorizing the Housing Authority of the City of  
Austin to take the following actions with regard to the  
Sterling Springs Apartments in Austin, Texas**



**HOUSING AUTHORITY OF THE CITY OF AUSTIN  
BOARD OF COMMISSIONERS**

**BOARD ACTION REQUEST**

**Resolution No. 2496**

**MEETING DATE:** April 20th, 2017

**STAFF CONTACT:** Ron Kowal, Vice President of Housing Development/Asset Management

**ITEM TITLE:** Discussion, Consideration and Possible Action of Resolution No.2496: Resolution authorizing the Housing Authority of the City of Austin to take the following actions with regard to the Sterling Springs Apartments in Austin, Texas: (A) Acquire the site of the development;(B) Lease the development site to the owner of the development; and (C) such other actions necessary or convenient to carry out this resolution.

**BUDGETED ITEM:** N/A

**TOTAL COST:** Not to exceed \$3,000,000 from AAHC reserves

**ACTION:**

Motion to Approve Resolution No. 2496: Approval of resolution authorizing the Housing Authority of the City of Austin to take the following actions with regard to the Sterling Springs Apartments in Austin, Texas: (A) Acquire the site ;(B) Lease the developments site to the owner of the development; and(C) such other actions necessary or convenient to carry out this resolution.

**SUMMARY:**

The Austin Affordable Housing Corporation (AAHC), a nonprofit subsidiary of the Housing Authority of the City of Austin (HACA), was created to own, engage in or assist in the development or operation of affordable housing, including but not limited to income producing projects whose proceeds are used to further HACA's mission of moving its residents and clients from poverty to self-sufficiency. AAHC, as one of its goals, has committed through acquisition and/or construction to the development of a portfolio of 4040 units by the year 2020.

Another goal of AAHC is to expand affordable housing and provide HACA residents a choice to live in high opportunity areas where housing choice vouchers currently are not accepted and to give low and moderate families housing in areas of better performing schools and services in locations outside the City of Austin's crescent of poverty.

An opportunity was presented to AAHC to purchase the Sterling Springs Apartment complex totaling 172 units at 2809 W. William Cannon Drive located in Southwest Austin. This property is in a high growth area providing residents with access to a large base of employers in the Austin area and exceptional schools that are located in the Austin Independent School District. The property benefits from a neighborhood location with excellent access to MoPac Expressway via William Cannon Drive. Originally built as condominiums in 1984, currently all 172 units serve residents who are at 80% or below median family income.

HACA plans to partner with Enterprise Community Investment, a 501(c)(3) Corporation, whose mission is similar to AAHC of furthering the availability of affordable housing in high opportunity areas with low poverty rates. HACA and Enterprise will be partners with an investment not to exceed \$3,000,000 per partner. The purchase price is \$17,751,000 and will be financed in an amount not to exceed \$13,225,000 by Bellwether Enterprise with an interest rate at approximately 4.22%. The property, once purchased shall be managed by Austin Management Professionals (AMP), which has managed AAHC's non-tax credit property portfolio since 2005.

By approving Resolution 2496 the Board of the Housing Authority of the City of Austin would allow AAHC to acquire the site, lease the development to the owner of the development, authorize HACA to utilize up to \$3,000,000 in available funds for this acquisition and any such actions necessary or convenient to carry out this resolution.

### **EXHIBITS**

## RESOLUTION NO. 2496

**RESOLUTION AUTHORIZING THE HOUSING AUTHORITY OF THE CITY OF AUSTIN TO TAKE THE FOLLOWING ACTIONS WITH REGARD TO THE STERLING SPRINGS APARTMENTS (THE “DEVELOPMENT”) IN AUSTIN, TEXAS: (A) ACQUIRE THE SITE OF THE DEVELOPMENT; (B) LEASE THE DEVELOPMENT SITE TO THE OWNER OF THE DEVELOPMENT; AND (C) SUCH OTHER ACTIONS NECESSARY OR CONVENIENT TO CARRY OUT THIS RESOLUTION.**

Whereas, Austin Affordable Housing Corporation (“**AAHC**”) has entered into a certain purchase contract for the acquisition of the Development;

Whereas, in connection therewith, the Housing Authority of the City of Austin (“**HACA**”) has agreed to acquire certain real property in Austin, Texas (the “**Land**”), which constitutes the site for the Development, and to simultaneously lease the Land to an affiliate of AAHC (the “**Owner**”) under a long term ground lease (the “**Ground Lease**”);

Now, therefore, the Board of Commissioners of HACA hereby approves and adopts the following resolutions, and hereby authorizes its Chief Executive Officer (or the Chief Executive Officer’s designee) to do the following:

1. Acquire the Land and enter into the Ground Lease with the Owner.
2. Review, execute and approve of the Ground Lease and all such other documents necessary to effectuate the acquisition of the Land, execution of the Ground Lease and AAHC’s acquisition of the Development, including but not limited to such security instruments and estoppel certificates as any lender involved with the Development may require, all on such terms and containing such provisions as the Chief Executive Officer (or his designee) shall deem appropriate, and the approval of the terms of each such instrument shall be conclusively evidenced by his execution and delivery thereof.

This resolution shall be in full force and effect from and upon its adoption.

PASSED this \_\_\_\_ day of April, 2017.

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CHAIR

ATTEST:

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Secretary

**HOUSING AUTHORITY OF THE CITY OF AUSTIN  
BOARD OF COMMISSIONERS  
REGULAR BOARD MEETING**

**The Board will hold a Work Session to discuss HUD's Rental Assistance Demonstration (RAD) and the use of the program to improve HACA properties.**



**HOUSING AUTHORITY OF THE CITY OF AUSTIN  
BOARD OF COMMISSIONERS  
REGULAR BOARD MEETING**

**EXECUTIVE SESSION**

**The Board may go into Executive Session (close its meeting to the public)  
Pursuant to:**

- a. § 551.071, Texas Gov't Code, consultations with Attorney regarding legal advice, pending or contemplated litigation; or a settlement offer;**
- b. §551.072, Texas Gov't Code, discussion about the purchase, exchange, lease or value of real property;**
- c. §551.074, Texas Gov't Code, discuss the appointment, employment, evaluation, reassignment, duties, discipline, or dismissal of a public officer or employee; or to hear a complaint or charge against an officer or employee; including but not limited to the evaluation of the President/CEO**
- d. §551.087, Texas Gov't Code, discuss certain economic development negotiations.**

**Return to Open Session for discussion, consideration and possible action of matters discussed in Executive Session**

**HOUSING AUTHORITY OF THE CITY OF AUSTIN  
BOARD OF COMMISSIONERS  
REGULAR BOARD MEETING**

**REPORTS**

**April 20, 2017  
Regular Meeting**

**HOUSING AUTHORITY OF THE CITY OF AUSTIN  
BOARD OF COMMISSIONERS  
REGULAR BOARD MEETING**

**ADJOURNMENT**

**April 20, 2017  
Regular Meeting**