



HOUSING AUTHORITY OF COVINGTON

better futures

The Housing Authority of Covington (KY002)

and

The City of Covington/
Housing Choice Voucher Program (KY133)

dba “Covington Consortium”

AGENCY PLAN FOR FY 2024
(JULY 1, 2024 – JUNE 30, 2025)

Steve Arlinghaus, Executive Director
2300 Madison Avenue, Covington, KY 41014
859.491.5311
859.292.3240 (fax)
800.545.1833, ext. 765 TTD/TTY
www.hacov.org





Date: Friday, February 16, 2024
To: Tenants, Applicants and Community Stakeholders
From: Housing Authority of Covington
RE: Public Notice – Agency Five Year and Annual Plans

Enclosed please find the Housing Authority of Covington’s proposed Annual and Five-Year Capital Fund Plans.

Proposed changes were presented on Friday, February 2, 2024 to the agency’s Resident Advisory Board, which includes Resident Council Officers from the communities of Latonia Terrace and Golden Tower. Notes from the meeting are contained herein.

Questions/comments, regarding the agency’s proposed changes to the Annual and Five-Year Plans, may be submitted, in writing, to the agency’s website at info@hacov.org by Tuesday, April 16, 2024. All questions/comments will be read aloud during the agency’s scheduled Public Hearing, Wednesday, April 17, 2024, 4:30 pm. Responses to all questions/comments will be posted in writing to the agency’s website within 5 working days.

A copy of the public notice, published in LINK nky Media, is attached.



BETTER FUTURES



Location

Kentucky

Notice Text

LEGAL NOTICE

The Covington Consortium, consisting of the Housing Authority of Covington (HAC), KY and the City of Covington Housing Choice Voucher Program, developed its Agency Plan in compliance with the Quality Housing and Work Responsibility Act of 1998.

Effective February 16, 2024, the Plan and pertaining documents will be made available for public review at: The Housing Authority of Covington Administration Building, 2300 Madison Avenue, Covington, 41014; The Housing Authority of Covington website, hacov.org; The agency's Property Management Offices at Latonia Terrace, 2940 Madison Ave, Covington, 41015 and Golden Tower, 50 E. 11th Street Covington, 41011; Covington City Hall, Housing Development Office, 20 West Pike Street, Covington, 41011; Public Library, 502 Scott Street, Covington, 41011; and Legal Aid of the Bluegrass/Covington, 104 East 7th Street, Covington, 41011. The Housing Authority's hours of operation are 8:00 a.m. - 4:30 p.m., Monday-Friday, excluding national, state, and local holidays.

The Housing Authority of Covington's Board of Commissioners' will convene a public hearing to discuss the Annual and Five-Year Plans and elicit comments from the public regarding proposed activities. The Hearing will begin at 4:30 p.m. on Wednesday, April 17, 2024, in the lower-level conference room at the Housing Authority of Covington Administration Building located at 2300 Madison Avenue, Covington, KY 41014. The public is invited to attend. The Administration Building is an accessible building. However, space is limited to the first 10 in-person attendees. As an alternative to in-person attendance, you may submit questions / comments in writing to info@hacov.org by Tuesday, April 16, 2024. All questions/comments submitted via the website will be read aloud during the Wednesday, April 17, 2024 Public Hearing. Responses to all comments/questions will be posted in writing to www.hacov.org within 5 working days.



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**HOUSING AUTHORITY OF COVINGTON &
CITY OF COVINGTON/HOUSING CHOICE VOUCHER PROGRAM
2024 CONSOLIDATED PLAN**

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5-Year PHA Plan (for All PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

OMB No. 2577-0226
Expires: 02/29/2016

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

A.	PHA Information.																										
A.1	<p>PHA Name: Housing Authority of Covington _____ PHA Code: KY002 _____</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/2024 PHA Plan Submission Type: <input checked="" type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>See A1 / 50075 -ST</p> <p>The Annual and 5Y Plans are available for review at the Central Office of the Consortium, each property management office, City Hall, Covington Public Library, Legal Aide of the Bluegrass/Covington, and the Housing Authority Web Site. A copy is also provided to each Resident Council.</p> <p><input checked="" type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <p>The Consortium currently administers 133 project-based units: Academy Flats (20), Eastside Revitalization 1 (18), Eastside Revitalization II (25), Eastside Revitalization III (25) and Lincoln Grant Scholar House (45). In the future, we may explore opportunities to increase this total, based on applicable funding and regulations.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>PHA1: Housing Authority of Covington</td> <td>KY-002</td> <td>Public Housing</td> <td>None</td> <td>490*</td> <td></td> </tr> <tr> <td>PHA2: City of Covington/HCV Department</td> <td>KY-133</td> <td>Housing Choice Voucher/Section 8</td> <td>None</td> <td></td> <td>1265</td> </tr> </tbody> </table> <p>*NOTE: TOTAL UNITS = 856; HOWEVER, 366 OF THESE UNITS ARE IN DISPOSITION STATUS</p>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:						PHA1: Housing Authority of Covington	KY-002	Public Housing	None	490*		PHA2: City of Covington/HCV Department	KY-133	Housing Choice Voucher/Section 8	None		1265
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B.	5-Year Plan. Required for <u>all</u> PHAs completing this form.
B.1	<p>Mission. State the PHA’s mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA’s jurisdiction for the next five years.</p> <p>PHA1 is committed to creating better neighborhoods by innovatively providing diverse housing opportunities for individuals and families in partnership with the greater community. These communities are focused on opportunities for our residents to flourish by achieving self-sufficiency.</p> <p>PHA2’s purpose is to assist eligible elderly, disabled and/or very – low-income households to obtain decent, safe and sanitary housing. In conjunction with PHA1, the City of Covington’s Economic Development and Neighborhood Services departments work to expand and revitalize Covington’s business and neighborhood opportunities.</p>
B.2	<p>Goals and Objectives. Identify the PHA’s quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years.</p> <p>PHA1 and PHA2 Strategic Goals 2024-2028:</p> <p>Goal One: Strengthen the housing portfolio by disposition of obsolete assets, modernization of high demand assets, and consolidation of the public housing and housing choice voucher programs.</p> <ul style="list-style-type: none"> • PHA1 and PHA2, which currently operate as separate PHA’s, are exploring the opportunity for consolidation. Both Boards of Commissioners approved consolidation in 12/2023. We have been working with the HUD Field Office staff for guidance on making a formal request to HUD for consolidation. <p>As this situation is unique -- a public housing PHA leading merger efforts with a HCV PHA - there are no models at this time to offer guidance. The goal with consolidation is to merge the two agencies for greater operating efficiencies, better customer service, improved financial sustainability, and increased opportunities to expand and maintain decent, safe, and affordable housing.</p> <p>PHA1 intends to draft a management agreement that will guide the day-to-day activities of a unified operation for PHA1 and PHA2, until such a time as the consolidation can be formally approved by HUD and interlocal agreements implemented with Kenton County local governments.</p> <ul style="list-style-type: none"> • PHA1 is contemplating the absorption of public housing units from certain scattered site properties into a new development. Building new public housing units while disposing of old, obsolete structures will be critical for long-term sustainability. Unfortunately, we are finding the quality of the renovations for acquired HOPE VI properties is sub-standard. Repositioning the portfolio in this way may be more cost effective long-term. It will also better position the agency to transition all public housing units to RAD in the future. <p>Goal Two: Expand affordable housing opportunities in the region. PHA1 will seek new partnerships that promote quality, affordable housing in the Northern Kentucky market. We will initiate market studies in 2025 to explore the feasibility of new housing opportunities. PHA1 may apply for a Choice Neighborhoods Planning Grant. PHA2 will strive to expand the number of landlords participating in the HCV program.</p> <p>Goal Three: Analyze PHA1 and PHA2 processes to maximize efficiency and effectiveness of operations. Work continues to fine-tune and enhance existing and new software programs. PHA1 implemented Skysite software in 2023 to archive all tenant leasing files. Most tenant files have been archived. New tenant information and existing tenant updates will be uploaded to Skysite. Such a tool will help PH1 save time and storage space. PHA2 will begin implementing online certifications and electronic communications which will increase efficiencies in all functional areas.</p> <p>Goal Four: Identify revenue and cost reduction strategies for improved fiscal performance. PHA1 is looking to automate many operations in 2024, such as invoice approval, vendor payments, on-line rent payments, on-line applications and re-certifications, and on-line work orders. PHA1 will improve tenant access to these functions through on-site kiosks and the Yardi/Rent Café module, while lowering administrative costs.</p> <p>Goal Five: Strive toward continuous improvement and achievement of high performer status in both PHAS and SEMAP annually. PHA1 senior staff participated in PHAS training in 2023. Succession and Staff Development Plans are in progress for senior staff. Many key positions will be retiring in the next 2-4 years.</p> <p>See HUD 50075-ST – Annual Plan, B.5 for more information.</p> <p>Note: The City of Covington identifies four priorities in alignment with PHA1/PHA2’s consolidated plan: 1) affordable housing, 2) public facilities/infrastructure improvements, 3) neighborhood and community services, and 4) business and economic development. Goals identified include, but are not limited to: expand homeownership opportunities, increase affordable homeownership units, increase affordable rental units, and improve existing owner occupied housing.</p>

<p>B.3</p>	<p>Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.</p> <p>See Annual Plan/B5 PHA1 and PHA2 Goals/Progress – Previous 5 Year Plan:</p> <p>Goal One: Strengthen the housing portfolio by disposition of obsolete assets and modernization of high demand assets. PHA1 is 95%+ through the relocation of City Height residents. Overall, former residents were very satisfied with the relocation support they received. We are on target for 100% vacancy in early 2024. We also completed the stack line replacement project at Golden Tower in 2023.</p> <p>Goal Two: Expand affordable housing opportunities in the region. PHA1 has initiated conversations with new partners to promote quality, affordable housing in Northern Kentucky. PHA2 continues to expand the number of landlords in the HCV program.</p> <p>Goal Three: Analyze PHA1 and PHA2 processes to maximize efficiency and effectiveness of operations. PHA1 implemented YARDI software in 2021, which is substantially complete but continues to be fine-tuned and improved with the help of 3rd party consultants. PHA2 likewise implemented new software (SACS) in 2021 which has resulted in improved operating efficiencies.</p> <p>Goal Four: Identify revenue and cost reduction strategies for improved fiscal performance. PHA1 is in the process of streamlining system operations, including invoice approval, vendor payments, on-line rent payments, on-line applications and re-certifications, and on-line work orders. These process improvements will ultimately save staff time and money. PHA1 also intends to improve applicant and tenant access to housing services via on-site kiosks and Yardi/Rent Café. Finally, PHA1 recently transitioned the majority of all tenant paper files to electronic files. Historic records have been archived through Skysite software and we will continue to use this tool to manage files moving forward. This will do away with our dependence on paper files and bulky file storage systems.</p> <p>Goal Five: Strive toward continuous improvement and achievement of high performer status in both PHAS and SEMAP annually. PHA1 achieved Standard Performer status in 2023. Work continues to increase PHA1’s PHAS scores. Nan McKay PHAS training was held in 3/2023 with PHA1 management staff. Strategies include staff training and process improvements. PHA1 is in the process of developing Succession and Staff Development Plans for senior staff in 2024. PHA2 achieved High Performer status in 2023.</p>
<p>B.4</p>	<p>Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA’s goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.</p> <p>PHA1 and PHA2 fully comply with the Violence Against Women Act (VAWA). It is our objective to work with others to prevent offenses covered by VAWA to the degree we are able.</p> <p>We work closely with local non-profits positioned to serve child or adult victims of domestic violence, dating violence, sexual assault, stalking, physical neglect and emotional abuse. These agencies include but are not limited to: Welcome House, Ion Center (formerly Women’s Crisis Center), Child Protective Services, and Adult Protective Services.</p> <p>PHA1 has a wait list preference for victims of domestic violence and a trespass list for abusers. PHA2 gives preference points to families in the Safe Havens program.</p> <p>We periodically partner with local non-profits to co-sponsor seminars/ webinars on issues surrounding domestic violence, abuse, and neglect.</p> <p>VAWA is discussed at new tenant orientations and covered again during re-certification.</p> <p>PHA1 issues tenants a Resource Directory that contains agency information for those who offer crisis and support services.</p> <p>VAWA is also covered in each PHA’s ACOP/Administrative Plan.</p>

B.5	<p>Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.</p> <p>Significant Amendments/Modifications are defined as discretionary changes in the plans or policies of the housing authority that fundamentally change the mission, goals, objectives, or plans of the agency and which require formal approval of the Board of Commissioners. Proposed demolition, disposition, homeownership, Capital Fund Financing, development, mixed finance proposals, changes to the rent or admission policies, organization of the waiting list, or the additions of non-emergency work items not included in the approved CFP annual or five-year plan are considered to be significant amendments to the CFP 5 Year Action Plan. Changes in plans that do not involve federal funds are excluded from the HUD planning process.</p> <p>See B1 / 50075-ST</p> <p>Significant Amendments / Modifications to 2024-2025 Annual Plan include changes with PHA1’s flat rent and tenant charge schedules, modification to the wait list process, required changes in HOTMA regulations, and updated occupancy criteria based on the HUD-approved officially elderly designation for the Golden Tower and Academy Flats senior communities.</p> <p>In addition, PHA1 and PHA2, which currently operate as separate PHA’s, are exploring the opportunity for consolidation. Both Boards of Commissioners approved consolidation in 12/2023. We have been working with the HUD Field Office staff for guidance on making a formal request to HUD for consolidation.</p> <p>As this situation is unique -- a public housing PHA leading merger efforts with a HCV PHA - there are no models at this time to offer guidance. The goal with consolidation is to merge the two agencies for greater operating efficiencies, better customer service, improved financial sustainability, and increased opportunities to expand and maintain decent, safe, and affordable housing.</p> <p>As clear direction on consolidation is not available as of this writing, we intend to draft a management agreement that will guide the day-to-day activities of a unified operation for PHA1 and PHA2, until such a time as the request for consolidation can be formally submitted to HUD for approval and interlocal agreements drafted and implemented with Kenton County local governments.</p>
B.6	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the 5-Year PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p>HAC staff met with the Resident Advisory Board, including members of the Resident Councils, on February 2, 2024, to review proposed changes to the lease, ACOP, maintenance charges, flat rents, and the Five-Year Capital Fund Project Plan. Notes were taken and are included with the HUD 50075-ST form.</p> <p>Due to inflationary pressures, the proposed increases in flat rents are 90% of the FMR.</p>
B.7	<p>Certification by State or Local Officials.</p> <p><u>Form HUD 50077-SI</u>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>

Instructions for Preparation of Form HUD-50075-5Y

5-Year PHA Plan for All PHAs

A. PHA Information [24 CFR §903.23\(4\)\(e\)](#)

A.1 Include the full PHA Name, PHA Code, PHA Fiscal Year Beginning (MM/YYYY), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table.

B. 5-Year Plan.

B.1 Mission. State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years. [\(24 CFR §903.6\(a\)\(1\)\)](#)

B.2 Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years. [\(24 CFR §903.6\(b\)\(1\)\)](#) For Qualified PHAs only, if at any time a PHA proposes to take units offline for modernization, then that action requires a significant amendment to the PHA's 5-Year Plan.

B.3 Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5- Year Plan. [\(24 CFR §903.6\(b\)\(2\)\)](#)

B.4 Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. [\(24 CFR §903.6\(a\)\(3\)\)](#)

B.5 Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

B.6 Resident Advisory Board (RAB) comments.

(a) Did the public or RAB provide comments?

(b) If yes, submit comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. [\(24 CFR §903.17\(a\), 24 CFR §903.19\)](#)

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year PHA Plan. The 5-Year PHA Plan provides the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average .76 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A.	PHA Information.																										
A.1	<p> PHA Name: <u>Housing Authority of Covington</u> PHA Code: <u>KY002</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2024</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>490*</u> Number of Housing Choice Vouchers (HCVs) <u>1265</u> Total Combined Units/Vouchers <u>1750</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> The Annual Plan is available for review at the Central Office of the Consortium, each property management office, City Hall, Covington Public Library, Legal Aide of the Bluegrass/Covington, and the Housing Authority Web Site. A copy is also provided to each Resident Council. </p> <p> <input checked="" type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) The Consortium currently administers 133 project-based units: Academy Flats (20), Eastside Revitalization I (18), Eastside Revitalization II (25), Eastside Revitalization III (25) and Lincoln Grant Scholar House (45). In the future, we may explore opportunities to increase this total, based on applicable funding and regulations. </p> <p> Analyses of local Housing Needs, based on Wait List statistics, is included in Exhibits 1 and 2 attached. </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>PHA 1: Housing Authority of Covington</td> <td>KY-002</td> <td>Public Housing</td> <td>None</td> <td>490*</td> <td></td> </tr> <tr> <td>PHA 2: City of Covington Housing Department</td> <td>KY-133</td> <td>Housing Choice Voucher/Section 8</td> <td>None</td> <td></td> <td>1265</td> </tr> <tr> <td colspan="6">*NOTE: TOTAL UNITS=856; 366 UNITS ARE IN DISPOSITION STATUS</td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	PHA 1: Housing Authority of Covington	KY-002	Public Housing	None	490*		PHA 2: City of Covington Housing Department	KY-133	Housing Choice Voucher/Section 8	None		1265	*NOTE: TOTAL UNITS=856; 366 UNITS ARE IN DISPOSITION STATUS					
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B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

- (a) Have the following PHA Plan elements been revised by the PHA?
- (b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs
- De-concentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources.

Statement of Housing Needs/Strategies:

Since HUD's approval to dispose of City Heights, effective 9/30/21, nearly all residents have been relocated. Only eight households remain occupied. We anticipate all residents may be relocated by April 2024. The property will then be sold, and the sales proceeds used to renovate/upgrade other properties and/or possibly acquire a parcel of land for future development.

In the meantime, the Maintenance Shop, located in City Heights, will be moving to 1650 Russell Street, Covington, KY 41011. This property was purchased in late 2023 in anticipation of the closure of City Heights. It is a centrally located commercial space that will be renovated for Maintenance and other staff. Two security cameras will be installed on the property.

As we look to the future, the loss of operating subsidy and capital funds from City Heights will bring greater financial pressure upon the agency. According to the Capital Fund Guidebook, PHA1 may expect DDTF Dem/Dispo Transitional Funding from Capital Funds for a period of 5 years from the date property deed transfer, then capital funds will cease. Operating funds, too, will decrease over a two-year period following the last tenant relocation. Significant cost cutting strategies, as well as creative solutions for increased tenant and grant revenue, will be necessary for long term sustainability.

Finally,

See HUD-50075-5Y.

Financial Resources: See Exhibit 3

- Rent Determination.
- Operation and Management.
- Grievance Procedures.
- Homeownership Program.

- Community Service and Self-Sufficiency Programs.
- Safety and Crime Prevention.

Operation and Management: Lease and ACOP changes have been made for improved fiscal and process efficiencies. These include, but are not limited to, the transition from multiple to one wait list for public housing. Updates have been included for the Over Income Policy following HOTMA requirements made effective 6/16/23. Other updated HOTMA requirements will be effective in 2024/2025, or upon official notice by HUD. (See Exhibits 4 and 5: Summaries of Lease and ACOP Changes)

Grievance Procedures: Options for in-person and teleconference meetings for Grievance Hearings have been added.

Community Service and Self-Sufficiency Programs: At the request of both HUD and the City of Covington, KY002 was asked to assume the management of the HCV/FSS program, effective January 1/22/24. KY002 staff have worked closely with HUD Field Office staff and the City of Covington on a plan to assume all FSS grant responsibilities and provide seamless supports for program participants.

Safety and Crime Prevention: Plans are under way to upgrade and/or install new security camera and license plate reader equipment at Latonia Terrace, Golden Tower, and Academy Flats.

The Capital Fund budget includes physical needs assessments for the scattered site properties. A lead-based paint sampling project was completed in 2023. Few deficiencies were found, but work is in progress to remedy the deficiencies. Sampling will continue in 2024 and beyond at all family sites, with the exception of Latonia Terrace. Latonia Terrace will undergo significant renovations once the City Heights property is sold. This will allow the agency to abate potential areas for lead while units are under renovation.

- Pet Policy.
- Asset Management.
- Substantial Deviation.
- Significant Amendment/Modification

Significant Amendments/Modifications are defined as discretionary changes in the plans or policies of the housing authority that fundamentally change the mission, goals, objectives, or plans of the agency and which require formal approval of the Board of Commissioners. Proposed demolition, disposition, homeownership, Capital Fund Financing, development, mixed finance proposals, changes to the rent or admission policies, organization of the waiting list, or the additions of non-emergency work items not included in the approved CFP annual or five-year plan are considered to be significant amendments to the CFP 5 Year Action Plan. Changes in plans that do not involve federal funds are excluded from the HUD planning process.

Significant Amendments / Modifications to 2024-2025 Annual Plan include changes with PHA1's flat rent and tenant charge schedules, modification to the wait list process, required changes in HOTMA regulations, and updated occupancy criteria based on the HUD-approved officially elderly designation for the Golden Tower and Academy Flats senior communities.

In addition, PHA1 and PHA2, which currently operate as separate PHA's, are exploring the opportunity for consolidation. Both Boards of Commissioners approved consolidation in 12/2023. We have been working with the HUD Field Office staff for guidance on making a formal request to HUD for consolidation.

As this situation is unique -- a public housing PHA leading merger efforts with a HCV PHA - there are no models at this time to offer guidance. The goal with consolidation is to merge the two agencies for greater operating efficiencies, better customer service, improved financial sustainability, and increased opportunities to expand and maintain decent, safe, and **affordable** housing.

As clear direction on consolidation is not available as of this writing, we intend to draft a management agreement that will guide the day-to-day activities of a unified operation for PHA1 and PHA2, until such a time as the consolidation can be formally approved by HUD and interlocal agreements implemented with Kenton County local governments.

(c) The PHA must submit its De-concentration Policy for Field Office review.

After review, PHA1 is not subject to the de-concentration requirements according to 24 CFR 903.2.

New Activities.

B.2

- (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?
- (b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.

Y N

- Hope VI or Choice Neighborhoods. (CNI Planning Grant) **HAC may apply for a Choice Neighborhoods planning grant in 2025.**
- Mixed Finance Modernization or Development.
- Demolition and/or Disposition.

Disposition:

No new community disposition activities are planned for 2024. We are winding down the disposition of City Heights, formerly approved 9/30/21. As of this writing, City Heights is 2% occupied. We anticipate all units will be vacant by March/April 2024, at which time, the property will be put up for sale.

There is one other non-tenant property under consideration for possible disposition, though the feasibility of selling the property will need to be explored. 1016 Greenup Street, a non-tenant property, was formerly used for office space for resident support services. However, it has primarily stood vacant for much of the last 5+ years. The property was acquired for \$1.00 from the City of Covington in the 1990's. More research is required. In the meantime, the property is currently being rented by Neighborhood Investment Partners (NIP) that manages Emery Drive, Eastside Revitalization II and Eastside Revitalization III.

Y N

- Designated Housing for Elderly and/or Disabled Families.
- Conversion of Public Housing to Tenant-Based Assistance.
- Conversion of Public Housing to Project-Based Assistance under RAD.
- Occupancy by Over-Income Families
- Occupancy by Police Officers.
- Non-Smoking Policies. **(Implemented 7/2014)**

Designated Housing:

A designated housing plan was approved by HUD on 11/28/2023. The plan calls for designating Golden Tower and Academy Flats as "officially elderly." The designation will require applicants and residents for these communities to be 62 + years of age. However, those who are 50-61 years of age with a documented disability may also apply for residency, if not enough applicants 62+ years of age are eligible.

Other:

PHA1 is contemplating the absorption of public housing units from certain older scattered site properties/mixed finance developments into a new development. Building new public housing units while disposing of old, obsolete structures will be critical for long-term sustainability. Unfortunately, we are finding the quality of the renovations for acquired HOPE VI properties is sub-standard. Repositioning the portfolio in this way may be more cost-effective long-term. It will also better position the agency to transition all public housing units to RAD in the future.

- Project-Based Vouchers.
- Units with Approved Vacancies for Modernization.

Once City Heights is sold, the sales proceeds will largely be used to modernize Latonia Terrace. There may come a time when some of the units at Latonia Terrace need to be taken off-line for modernization. It is impossible to know if, when, or how many but we will be prepared to do so if necessary, pending HUD approval.

- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

Civil Rights Certification.

Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

B.4 Most Recent Fiscal Year Audit.

(a) Were there any findings in the most recent FY Audit?

- Y N
-

(b) If yes, please describe:
Have not received the 2023 audit.

B.5 Progress Report.

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.

Goal One: Strengthen the housing portfolio by disposition of obsolete assets and modernization of high demand assets	PHA1 is more than 95% through the relocation of City Heights residents. We are on target for 100% vacancy in early 2024. We completed the stack line replacement project at Golden Tower in 2023.
Goal Two: Expand affordable housing opportunities in the region	PHA1 seeks new partnerships that promote quality, affordable housing in the Northern Kentucky market. We will initiate market studies in 2025 to explore the feasibility of new housing opportunities. PHA1 may also explore the feasibility of a Choice Neighborhoods Planning Grant application. PHA2 will work to expand the number of landlords participating in the HCV program.
Goal Three: Analyze PH1 and PH2 processes to maximize efficiency and effectiveness of operations.	PHA1 implemented YARDI software in 2021, which is complete but continues to be fine-tuned and improved with the help of Yardi and 3 rd party consultants. We are also working to automate many system processes that will save time and money, including the Yardi Rent Café module. (See Goal 4 below.) PHA2 will begin implementing online certifications and electronic communications which will increase efficiencies in all functional areas.
Goal Four: Identify revenue and cost reduction strategies for improved fiscal performance.	PHA1 is in the process of streamlining system operations, including invoice approval, vendor payments, on-line rent payments, on-line applications and re-certifications, and on-line work orders. These system and process improvements will ultimately save staff time and money. We also intend to improve applicant and tenant access to housing services via on-site kiosks. Finally, PHA1 is transitioning to electronic filing for all tenant records. We have archived all historic records and will be utilizing a software tool called Skysite to manage future electronic files. This will do away with our reliance on tenant paper files and bulky file storage systems.
Goal Five: Strive toward continuous improvement and achievement of high performer status in both PHAS and SEMAP annually.	Work continues in order to achieve increases in PHA1's PHAS scores. PHA1 was designated a Standard Performer in 2023. Strategies include talent acquisition, staff training, and process improvements. PHA1 is developing Succession and Staff Development Plans for senior staff in 2024. PHA2 achieved High Performer status in 2023.

<p>B.6</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p>HAC staff met with the Resident Advisory Board, including members of the Resident Councils, on February 2, 2024, to review proposed changes to the lease, ACOP, maintenance charges, flat rents, and the Five-Year Capital Fund Project Plan. Notes were taken and are attached in Exhibit 6.</p> <p>Due to inflationary pressures, the proposed increases in flat rents are 90% of the FMR.</p>
<p>B.7</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>B.8</p>	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C. Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>	
<p>C.1</p>	<p>Capital Improvements.</p> <p>A summary of the 5YCF Plan for 2024-2028 was presented to the Resident Advisory Board on 2/2/24 and made available for public viewing 2/16/24-4/1/24. (See Exhibit 7)</p> <p>The 2023-2027 5Y CF Plan will be presented to the BOC for approval on 4/17/24, along with the Annual Plan, and submitted for Field Office Review in EPIC thereafter by the Procurement Officer/Capital Asset Manager.</p>

Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

A. PHA Information. All PHAs must complete this section.

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Inventory**, **Number of Public Housing Units and or Housing Choice Vouchers (HCVs)**, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. ([24 CFR §903.23\(4\)\(e\)](#))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. ([24 CFR §943.128\(a\)](#))

B. Annual Plan. All PHAs must complete this section.

B.1 Revision of PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.” (24 CFR §903.7)

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(1)) Provide a description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. (24 CFR §903.7(a)(2)(iii))

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b)) Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA’s procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)) A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

Operation and Management. A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))

Grievance Procedures. A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))

Homeownership Programs. A description of any Section 5h, Section 32, Section 8y, or HOPE VI public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

Community Service and Self Sufficiency Programs. Describe how the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. (24 CFR §903.7(l)) A description of: **1)** Any programs relating to services and amenities provided or offered to assisted families; and **2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS. (24 CFR §903.7(l))

Safety and Crime Prevention. Describe the PHA’s plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

Pet Policy. Describe the PHA’s policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

Asset Management. State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

Substantial Deviation. PHA must provide its criteria for determining a “substantial deviation” to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

Significant Amendment/Modification. PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual Plan. Should the PHA fail to define ‘significant amendment/modification’, HUD will consider the following to be ‘significant amendments or modifications’: a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan) or change in use of replacement reserve funds under the Capital Fund; or c) any change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD’s website at: [Notice PIH 1999-51](#). (24 CFR §903.7(r)(2)(iii))

If any boxes are marked “yes”, describe the revision(s) to those element(s) in the space provided.

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark “yes” for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark “no.”

Hope VI or Choice Neighborhoods. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

Mixed Finance Modernization or Development. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

Demolition and/or Disposition. Describe any public housing projects owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA’s last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD’s website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

Designated Housing for Elderly and Disabled Families. Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, and; 5) the number of units affected. **Note:** The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

Conversion of Public Housing. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

Conversion of Public Housing. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to project-based assistance under RAD. See additional guidance on HUD’s website at: [Notice PIH 2012-32](#)

Occupancy by Over-Income Families. A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA’s cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD’s website at: [Notice PIH 2011-7](#). (24 CFR 960.503) (24 CFR 903.7(b))

Occupancy by Police Officers. The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A “police officer” means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD’s website at: [Notice PIH 2011-7](#). (24 CFR 960.505) (24 CFR 903.7(b))

Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD’s website at: [Notice PIH 2009-21](#). (24 CFR §903.7(e))

Project-Based Vouchers. Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan. (24 CFR §903.7(b))

Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

B.3 Civil Rights Certification. Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered

in compliance with the AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o))

- B.4 Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark “yes” and describe those findings in the space provided. (24 CFR §903.7(p))
- B.5 Progress Report.** For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA’s progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))
- B.6 Resident Advisory Board (RAB) comments.** If the RAB provided comments to the annual plan, mark “yes,” submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA’s decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)
- B.7 Certification by State of Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.
- B.8 Troubled PHA.** If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark “yes,” and describe that plan. If the PHA is troubled, but does not have any of these items, mark “no.” If the PHA is not troubled, mark “N/A.” (24 CFR §903.9)
- C. Statement of Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR 903.7 (g))
- C.1 Capital Improvements.** In order to comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan. PHAs can reference the form by including the following language in Section C. 8.0 of the PHA Plan Template: “See HUD Form- 50075.2 approved by HUD on XX/XX/XXXX.”

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 9.2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

B. Housing Needs of Families on the Public Housing Waiting Lists

State the housing needs of the families on the PHA's waiting list/s. Complete one table for each type of PHA-wide waiting list administered by the PHA. PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

Housing Needs of Families on the Waiting List

Waiting List Type: (select one)

- Section 8 tenant-based assistance
- Public Housing**
- Combined Section 8 and Public Housing
- Public Housing Site-Based or sub-jurisdictional waiting list (optional)Housing
If used, identify which development/sub-jurisdiction:

	# of families	% of total families	Annual Turnover
Waiting list total	61		NA
Extremely low income <=30% AMI	52	85.20%	
Very low income (>30% but <=50% AMI)	0	0.0%	
Low income (>50% but <80% AMI)	0	0.0%	
Families with children	15	24.60%	
Elderly families	14	22.90%	
Families with Disabilities	25	40.98%	
Race/ethnicity (White)	31	50.81%	
Race/ethnicity (Black)	26	42.62%	
Race/ethnicity (Asian/Other)	0	0.0%	
Race/ethnicity (Hispanic)	0	0.0%	
Characteristics by Bedroom Size (PH Only)			
1 BR	34	55.73%	
2 BR	7	11.47%	
3 BR	10	16.39%	
4 BR	0	0.0%	
5 BR	0	0.0%	
5+ BR	0	0.0%	

Is the waiting list closed (select one)? No Yes

If yes: Formerly closed for 33 months due to approved disposition of City Heights

How long been closed (# of months)?

Does the PHA expect to reopen the list in the PHA Plan year? No Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? No Yes

NOTE: Data does not add to 100% due to Waiting List Conversion.

Housing Needs of Families on Waiting List

EXHIBIT 2

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) <input checked="" type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/sub-jurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	1,937		22%
Extremely low income <=30% AMI	1,682	87	
Very low income (>30% but <=50% AMI)	222	11	
Low income (>50% but <80% AMI)	30	2	
Families with children	702	36	
Elderly families	128	>1	
Families with Disabilities	145	>1	
White	1,125	58	
Black	769	40	
Native American / Alaska Native	30	>1	
Asian	6	>1	
Native Hawaiian / Pacific Islander	7	>1	
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: How long has it been closed (# of months)? Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

2024 PHA Annual Plan Attachment B.1 Financial Resources

Exhibit 3

Housing Authority #	Housing Authority Name	Fiscal Year Begin Date
KY002	Housing Authority of Covington (HAC)	July 1, 2023

[24 CFR Part 903.7] This statement must address the financial resources that are available to the PHA for the support of Federal public housing and Section 8 tenant-based assistance programs administered by the PHA during the plan year.

The statement must include a listing, by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned uses for the resources.

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FFY 2024 grants)		
a) Public Housing Operating Fund	\$3,275,774	
b) Public Housing Capital Fund	\$0	
c) HHERF	\$0	
d) HOPE VI Demolition	\$0	
e) Annual Contributions for Section 8 Tenant- Based Assistance	\$6,915,895	
f) Public Housing Drug Elimination Program (including any	\$0	
g) Resident Opportunity and Self-Sufficiency Grants FSS-S8	\$38,375	
g) Resident Opportunity and Self-Sufficiency Grants - FSS	\$21,233	
i) Community Development Block Grant	\$0	
j) HOME	\$0	
2. Other Federal Grants		
2024 Capital Fund (Estimate)	\$2,500,000	LIPH Capital Improvement
3. Prior Year Federal Grants (unobligated funds only) (list below)		
2023 Capital Fund Program	\$2,385,374	LIPH Capital Improvement
2022 Capital Fund Program	\$1,067,626	LIPH Capital Improvement
2021 Capital Fund Program	\$0	LIPH Capital Improvement
2020 Capital Fund Program	\$245,161	LIPH Capital Improvement
2019 Capital Fund Program	\$47,871	LIPH Capital Improvement
4. Public Housing Dwelling Rental Income		
	\$1,560,000	
5. Non-federal sources (list below)		
Interest Income	\$16,399	
6. Non-federal sources (list below)		
Rooftop Rental	\$52,800	
Total resources	\$18,126,508	

LEASE CHANGES FOR 2024/2025

Section 1 – Last paragraph – Additions and / or removals from the household shall be reported to the Housing Specialist within seven (7) calendar days.

Section 5 – Occupancy: Clarified item H. The resident shall not allow any person(s) other than those listed on the lease to use their address. Use of address will be considered verification of unauthorized occupancy and may be subject to lease termination.

Section 8 – Rent Recertification: Mandatory Earned Income Disallowance: HUD no longer offers the Earned Income Disallowance, after 1/1/2024. For those still on the EID allowance, the program will discontinue on 12/31/2025. The rent will be based on 30% of the household's annual adjusted income.

Section 9 – Interim Adjustments – Reporting timeframe –Residents must report changes in income, assets and/or household composition within 7 calendar days, not 15 calendar days.

The lease will read: The resident must report and provide supporting documentation of any change in income, asset, and /or household composition to the Housing Specialist, within seven (7) calendar days, whenever they occur, between Annual Rent Recertifications.

Section 11 – Resident Obligation to Repay – C: In the event a resident has been charged retro rent, in the amount of \$2500 or greater, this will be considered Fraud, and the Housing Authority will move to evict based on Criminal Fraud. The Housing Authority reserves the right to prosecute for failure to report timely or provide verification of income.

Section 12: Maintenance: A: The resident agrees to keep the dwelling unit and any other areas assigned for the Resident's exclusive use (i.e., exterior steps, porches, and yards) in a clean and safe condition according to PHA Housekeeping policy.

Section 16: Lease Termination by Landlord

M: Any activity by a household member, guest, or any other person on the premises under the Resident's control that threatens the health, safety, or right to peaceful enjoyment of the premises by other Residents or employees of the Landlord. This includes bullying. This includes but is not limited to harassment, bullying, and physical threats. There is zero tolerance for adults and youth bullying on PHA premises.

X: Failure to promptly notify the Landlord of any pest infestations noted in or around their dwelling unit.

Y: Poor housekeeping that contributes to pest infestation as well as the failure to comply with pest control treatment preparations as directed by the contractor and/or PHA staff. Failure to pay for pest control charges as a result of a tenant's refusal to cooperate will be considered a lease violation.

Section KK: In the event a resident has been charged retro rent, in the amount of \$2,500 or greater, this will be considered Criminal Fraud, and the PHA will move to evict based on Criminal Fraud. The PHA reserves the right to prosecute for failure to report timely or provide verification of income, assets and/or family composition.

Section 18: Lease Termination by the Resident - Clarified resident's financial responsibility in last sentence. The resident is responsible for rent until the possession of the unit (keys) have been turned in and in addition to the requirements listed by the notice period.

Section 20: Delivery of Notices - Removed Emery Drive from the list of development offices.

ACOP Changes 2024-2025

1. ACOP 7.0 Taking Applications

A telecommunications service for the deaf (TDD) is available for any applicant, resident, community member or agency to conduct business with HAC. This accommodation is a Fair Housing Communication requirement. The TDD service telephone #, through the state of Kentucky, is 800.648.6056.

2. ACOP 9.0 Managing the Waiting List

HAC is no longer using site-based waiting lists. All applicants will apply to one of two wait lists, based on their need for either family or senior housing. For family housing, applicants will be placed on a wait list by bedroom size, on a first come-first served basis. For senior housing, applicants must be 62+ years of age or at least ages 50-61 with a documented disability. Applicants will be given 2 unit offers. If both offers are refused, the applicant will be withdrawn from the waiting list and required to wait one year before re-applying.

3. ACOP 9.4 Purging the Waiting List

HAC will update its waiting lists at least every 6 months.

4. ACOP 9.5 Removal from the Waiting List

Change Leasing Specialist to Housing Specialist.

5. ACOP 9.6 Missed Appointments

Change Leasing Specialist to Housing Specialist.

6. ACOP 10.1 Preferences

HAC's waitlist preference criteria have been updated. Please see the attached.

7. ACOP 10.6 Offer of a Unit

HAC will contact the family by telephone or ~~in person~~ postal mail to make the unit offer.

8. ACOP 10.8 Acceptance of Unit

Prior to signing the lease, all families (head of household and other adult family members) will be required to attend an in-person orientation. An in-person appointment will be set up once the family has viewed and accepted the unit. This will occur within 3 days of accepting the unit and may be done on the same day if the Housing Manager is available.

9. ACOP 15.0 Annual and Interim Recertifications

The number of days to report a change in income, assets and/or household composition has been changed from 15 days to 7 days.

10. ACOP 15.7 Special Reexaminations

Adding language for Joint Custody and Approval of Caretaker

15.7A Joint Custody: Dependents subject to a joint custody arrangement will be considered a member of the family if they live with the applicant or participant family 50%+ of the time. When more than one applicant or assisted family (regardless of the program) are claiming the same dependent as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents. If there is a dispute about which family should claim them, the PHA will make the determination based on available documents such as court orders and IRS income tax returns as to which family has claimed the child for income tax purposes, school records, or other credible documentation.

15.7B Approval of Caretaker: The approval of a caretaker, for a child under the age 18, is at the PHA's discretion and subject to screening criteria. If neither a parent nor designated guardian remains in a household receiving subsidy, HAC will take the following actions:

If a responsible agency has determined that another adult is to be brought into the assisted unit to care for a child for an indefinite period, the designated caretaker will not be considered a family member until a determination of custody or legal guardianship is made.

If a caretaker has assumed responsibility for a child without the involvement of a responsible agency or formal assignment of custody or legal guardianship, the caretaker will be treated as a visitor for 90 days. After 90 days has elapsed, the caretaker will be considered a family member unless information is provided that would confirm that the caretaker's role is temporary, in such cases the PHA will extend the caretaker's status as an eligible visitor.

The eligible visitor will be responsible for all rent due for the unit.

At any time that custody or guardianship legally has been awarded to the caretaker, the PHA will make the caretaker the head of the household, if eligible, to be housed after the completion of screening.

During any period that a caretaker is considered a visitor, the income of the caretaker is not counted as annual income toward the calculation of rent and the caretaker does not qualify the family for any deductions from income.

11. ACOP 16.0 Unit Transfers

Clarified language: For residents transferring to other PHA properties, security deposits will be refunded as appropriate. Any rent or other charges owed will be subtracted from the deposit and a check issued to the resident for the remaining amount. A new security deposit will be charged at the new property.

Prorated rent will be charged to the exiting and accepting properties appropriately. The resident will be informed prior to the move of what the prorations will be for each property.

Additionally, if the security deposit for the new unit is greater than the security deposit for the original unit, the difference will be collected from the family. Conversely, if the security deposit is less, the difference will be refunded to the family.

12. ACOP 17.2 Annual Inspections

The Housing Inspector or Property Manager will inspect each public housing unit at least twice a year, to ensure that each unit meets PHA housing standards. Workorders will be submitted and completed to correct any deficiencies.

13. ACOP 20.2 – Termination by the Housing Authority

m. any activity by a household member, guest, or any other person on the premises under the Resident's control that threatens the health, safety, or right to peaceful enjoyment of the premises by other Residents or employees of the Landlord. This includes but is not limited to harassment, bullying, and physical threats. There is zero tolerance for adult and youth bullying on PHA premises.

x. Failure to promptly notify the landlord of any pest infestations noted in or around their dwelling unit.

y. Failure to comply with pest control treatment preparation instructions, included but not limited to: failure to pay for pest control costs due to refusals, poor housekeeping or failure to prepare.

kk. Added: In the event a resident is charged retro rent in the amount of \$2,500 or greater, this will be considered Criminal Fraud, and the Housing Authority will move to evict based on Criminal Fraud. The Housing Authority reserves the right to prosecute for failure to report timely or provide verification of income, assets, or household composition.

14. ACOP 22.0 - Anti – Fraud Policy

See policy statement attached.

15. **GENERAL NOTICE - HOTMA** – HUD notified all PHA’s on 2/14/23 that three sections of the Housing Opportunity Through Modernization Act (HOTMA) 2016 that affects the calculation of rent, would need to change. Section 103 below became effective 6/16/23 for public housing tenants only. Sections 102 and 104 below were to take effect 1/1/24. However, implementation is being delayed due to both HUD and PHA software system issues. Until such a time as HUD and HAC are ready to implement the changes required, HAC will continue to conduct annual and interim reexaminations using current (pre-HOTMA) housing policies (Admissions and Continued Occupancy Plan (ACOP)). Anticipate future changes include the below:

Section 102: Income Reviews – HOTMA creates a +/- 10% adjusted income threshold before an interim reexam is necessary. In some cases, increases in earned income will not be processed until the next Annual Reexamination, allowing families to keep more of their earnings before receiving a rent increase. Other changes in the re-exam process that will impact the calculation of tenant rent include streamlined verifications, an increased standard deduction for elderly/disabled households, income exclusions, higher thresholds for medical/disability expenses for elderly / disabled families, a higher threshold for imputing asset income (\$5,000 to \$50,000), hardship relief for unanticipated medical and disability expenses, and ineligibility for the childcare expense deduction. Deductions are to be adjusted for inflation annually.

Section 103: Over Income – Section 103 was implemented 6/16/23 for public housing tenants. When a family’s income exceeds 120% AMI for 2 consecutive years, the PHA must terminate the family’s tenancy within 6 months of the 2nd income determination. If at any point during this two-year period a family experiences a decrease in income, they may request an interim redetermination of rent. The family will be notified by mail if they are no longer considered “over-income” and are eligible for a new two-year grace period.

Section 104: Asset Limits – HOTMA imposes a \$100,000 asset limit for housing eligibility and continued assistance. Families are ineligible for assistance if they own real property suitable for occupancy. Retirement and /or Educational Savings accounts are not considered a net family asset. PHAs will not have to include these accounts when calculating a family’s income and rent. HOTMA allows for self-certification of net assets <\$50,000 once every 3 years. However, new assets must be verified in Year 3. Asset limits are to be adjusted for inflation annually.

Addendum to ACOP: Grievance Procedure**1.0 PROCEDURES PRIOR TO A HEARING**

Any grievance shall be promptly and personally presented, in writing, to the Housing Authority of Covington office or to the office of the development in which the resident resides, so that the grievance may be discussed informally and settled. A summary of such discussion shall be prepared within fourteen (14) calendar days, with one copy given to the resident and one copy retained for PHA records. The summary shall specify names of those involved, dates, reason for the grievance, and the discussion outcome. The resident will also be given a copy of the process to request a hearing if the resident is not satisfied.

2.0 PROCEDURES TO OBTAIN A HEARING

When submitting a request for a hearing, the resident should include their name, current phone number, current address, and an email address.

In-Person Hearing- Once a request for an in-person hearing has been submitted, the resident will receive a letter in the mail with the date, time, and location of the hearing. It is up to the resident to notify the Housing Authority if the specified date and time do not work. The resident is required to attend the hearing at the specified date and time. Failure to attend without just cause will result in the Hearing Officer's automatic ruling for the Housing Authority of Covington.

Teleconference Calls- The Housing Authority offers the option to conduct Hearings via telephone conference calls. If the resident requests a telephone conference call, a form with instructions will be sent to the resident with the hearing appointment.

The resident is responsible to ensure HAC has a good working phone # on file.

MEETING NOTES

HOUSING AUTHORITY OF COVINGTON

**HAC STAFF AND RESIDENT COUNCIL ANNUAL/ 5 YEAR CAPITAL FUND PLANNING MEETING
Friday, February 2, 2024 1:30PM - 3:00PM**

A meeting of the Latonia Terrace Resident Council and Golden Tower Resident Council regarding the Housing Authority of Covington's Annual Plan and 5 Year Capital Fund projects, was held on **Friday, February 2, 2024 from 1:30pm-3:00pm** at the agency's main office, 2300 Madison Ave., Covington, KY 41071. A total of 10 staff members and residents were present at the meeting.

Housing Authority of Covington staff consisted of: Chris Bradburn, Deputy Director; Jon Adkins, Director of Resident Services; Shannon Wilson, Senior Housing Manager; Linda DiGirolamo, Procurement Officer/Capital Asset Manager; Gabrielle Pereda, Manager/Leasing & Recertification; Sharon Brown, Housing Manager/Latonia Terrace; and Kelly Connett, Executive Assistant to the Executive Director.

Three Resident Council officers were in attendance: Lestell Turney, President/Latonia Terrace; Veverly Gibson, President/Golden Tower; and Velma Golsby, Vice-President/Golden Tower.

AGENDA:

- Welcome
- Introductions
- Opening Remarks
- Housing Program
 - Lease
 - Admissions and Continued Occupancy Policy (ACOP)
 - Anti-Fraud Policy
 - Flat Rents
 - Maintenance Charges
 - Pest Control Management
 - Facility Use and Rental Charge Policies
- Capital Fund Projects-Priorities and Budget
- 45 Day Comment Period begins 2/16/2024 and goes to 4/1/2024
- Public Hearing 4/17/2024
- Comments/Questions/Concerns
- Adjournment

Chris Bradburn opened the meeting and outlined the following topics:

- Every year the Housing Authority of Covington reviews the lease, tenant policies, and capital project priorities with the goal of improving efficiencies and the affordable housing portfolio.
- Over the past 10-12 weeks, staff have held focus groups, reviewed physical needs assessment reports, tenant policies, rent and maintenance charges, and the capital fund budget.
- Today staff from various departments will present to you the proposed Annual Plan for 2024-2025 and seek input and suggestions from the Resident Councils on how to improve the communities.
- 45 Day Comment Period
- Public Hearing 4/17/24

Shannon Wilson and Gabrielle Pereda presented the updates on the Lease, Admissions and Continued Occupancy Plan (ACOP), Anit-Fraud Policy, Flat Rents, Maintenance Charges, Pest control Management, and Facility Use and Rental Charge Policies.

(Only Sections with Questions/Comments & Answers are mentioned)

The following Questions/Comments and Answers Resulted:

Proposed Lease Changes for 2024 Sections 1 - 20

Section 5: Occupancy: Clarified item H. The resident shall not allow any person(s) other than those listed on the ease to use their address. Use of address will be considered verification of unauthorized occupancy and may be subject to lease termination.

Comments:

Velma Golsby: My brother does not live there but has his mail delivered to my address. Is this a violation?

Shannon Wilson: Yes, as stated in item H. In this type of situation, he should have it delivered "In care of Velma Golsby" which does not denote him as a resident.

Section 8: Rent Certification: Mandatory Earned Income Disallowance: HUD no longer offers the Earned Income Disallowance, effective 1/1/2024. For those still on the EID allowance, the program will discontinue on 12/31/2025. The rent will be based on 30% of the household's annual adjusted income.

Comments:

Veverly Gibson: Why is this happening?

Gabrielle Pereda: Because HUD is ending the EID program.

Veverly Gibson: Does that mean my rent will be higher?

Gabrielle Pereda: If you are on the program, then yes, it will increase on 12/31/25.

Section 16: Lease Termination by Landlord: Clarified item KK. In the event a resident has been charged retro rent in the amount of \$2,500 or greater, due to failure to report increased income, this will be considered Criminal Fraud, and the PHA will move to evict based on Criminal Fraud. The PHA reserves the right to prosecute for failure to report timely or provide verification of income, asset and/or family composition.

Comments:

Veverly Gibson: What do you mean "Fraud"?

Gabrielle Pereda: If you are not being honest about your income this is "Fraud". Also, having unauthorized people living in your unit is considered "Fraud".

Veverly Gibson: OK, that makes sense.

Veverly Gibson: Wait, will working for CAC (senior employment program) be held against me?

Gabrielle Pereda: No, CAC is excluded but you still need to report it.

Section 18: Least Termination by the Resident: Clarified resident's financial responsibility in last sentence. The resident is responsible for rent until the possession of the unit (keys) have been turned in and in addition to the requirements listed by the notice period.

Comments:

Veverly Gibson: Will you just take that out of the deposit?

Chris Bradburn: What residents don't realize is that when a key is not turned in, we legally cannot take possession of the unit. So it's not just the cost of the key, it's the rent that HAC is losing by not being able to turn the unit and rent out in a timely manner.

Shannon Wilson: This could also mean that we may have to take the resident to court to recover the unit.

ACOP Changes 2024-2025

Section 10: Clarified item 15.7B Approval of Caregiver: The approval of a caregiver is at the PHA's discretion and subject to screening criteria. If neither a parent nor designated guardian remains in the household receiving subsidy, HAC will take (stated) actions.

Comments:

Veverly Gibson: What if I am sick and my son takes care of me. Does he need to be on the lease?

Shannon Wilson: No, that is considered a live-in aid, not a caregiver. Caregiver, in this sense, is someone who cares for a child with serious illness or disability. Live-in Aids are for adults.

HOTMA - Section 103: Over Income: Section 103 was implemented 6/16/23 for public housing tenants. When a family's income exceeds 120% AMI for 2 consecutive years, the PHA must terminate the family's tenancy within 6 months of the 2nd income determination. If at any point during this two-year period a family experiences a decrease in income, they may request an interim redetermination of rent. The family will be notified by mail if they are no longer considered "over-income" and are eligible for a new two-year grace period.

Comments:

Veverly Gibson: Does this mean Social Security Retirement too?

Gabrielle Pereda: No, but if you have an IRA, for example, that may make someone "over income."

22.0 Anti-Fraud Policy and Program Violations:

IMPLEMENTATION Policy (B): Applicant and resident program violations and fraud take many forms including, but not limited to, under reported and unreported income and assets, false identities, and unauthorized boarders and lodgers. Applicant and resident program violations and fraud are discovered primarily through HUD's Enterprise Income Verification (EIV) system, other data matching reporting, the personal observations of HAC staff, reports received from residents and others, and through the annual and interim recertification process. HAC staff shall remain constantly aware of the possibility of program violations and fraud and shall be vigilant in observing circumstances that may indicate potential

program violations and fraud. This includes, but is not limited to, residents and applicants with possessions or a lifestyle that cannot be supported on their reported income; residents who say they are unemployed who have departure and arrival patterns consistent with employment; and the arrival and departure patterns of guests.

Comments:

Veverly Gibson: So, does that mean that you can watch us come and go all the time?

Gabrielle Pereda: We have cameras on the properties for security purposes; but if we see a resident leaving and arriving home in a Burger King uniform, and they report that they do not have a job, we will assume they do, inquire about it, and adjust their information accordingly.

Chris Bradburn: Also, for example, if we notice a resident driving around in a new car, but they have no increase in income, that would be suspicious.

Shannon Wilson: If a tenant says that their boyfriend bought them the car and it is in the tenant's name, that is considered an asset.

Sharon Brown: If the boyfriend bought the car for the tenant and left it in his name, and the car is on the property constantly, then we assume that the boyfriend is an unauthorized occupant in the unit.

Veverly Gibson: What if my grandson who stays with me gets a summer job, does that count as income?

Gabrielle Pereda: Yes, if he is on the lease and is over 18 years of age.

Flat Rents (Effective 1/1/2024)

Comments:

Veverly Gibson: What does subsidized rent mean?

Gabrielle Pereda: It means that the Government is paying part of your rent.

MAINTENANCE CHARGES

Comments:

Veverly Gibson: If my lights are out, will I get charged for maintenance to fix it?

Shannon Wilson: You are responsible for the light bulbs. If the fixture is not working due to no fault of the household, then maintenance will repair at no cost.

Pest Control Management

Comments:

Veverly Gibson: What if I can't get rid of bugs because the apartment next to me has them?

Shannon Wilson: Between the Exterminators and the results of management/maintenance inspections, we can determine if the problem is coming from another unit, and you won't be charged if that is the case.

Facility Use and Rental Charge Policies

The tenant cost to rent a community room will increase to a \$100 deposit and \$75 rental fee.

Veverly Gibson: That is a big increase in price!

Chris Bradburn: The \$100 deposit will be refunded if the hall is cleaned and in good order.

I also want to mention that our rental fees have not increased in years. In addition, the lift chair at the Latonia Terrace Rec Hall has been damaged 3 times following tenant use since we installed it, which is a major repair expense to the agency.

Jon Adkins: I want to also mention that we recently rented a hall for an agency meeting that cost \$400, so, this is still a great deal.

Lestell Turney: You should also put in the rental agreement that the bathrooms should be in working order after they are rented and remind them about the no smoking rule.

Chris Bradburn: That is a great idea.

Chris Bradburn asked if there were any further questions or comments:

There were no further questions or comments.

Jon Adkins asked the Resident Councils to take the information presented to the next Resident Council meeting and discuss it with the attendees.

Chris Bradburn reminded the Resident Council members that there will be a 45-day comment period beginning 2/16/2024 through 4/1/2024 if they wish to submit questions or comments.

The Resident Council members were thanked for their participation and the meeting adjourned at 3:00pm.

COMMUNITY (AMP)	PROJECT	BUDGET CF24	BUDGET CF25	BUDGET CF26	BUDGET CF27	BUDGET CF28
	Operations- CH, LT, GT, ESR I, AF & NSP	506,350	576,573	581,757	587,565	590,996
	Operations- Emery	4,780	4,971	5,170	5,377	5,915
	Operations- ESR II	2,783	2,895	3,010	3,131	3,444
	Operations - ESR III	2,640	2,746	2,856	2,970	3,267
	Operations- River's Edge at Eastside Pointe	15,447	16,065	16,707	16,707	18,378
	Operations- Work truck, Pickup truck, Gater, etc.	80,000	26,000	26,000	26,000	26,000
	Operations- Trees	2,000	1,700	1,700	1,700	1,700
	Operations- 2300- Furniture, microwave, refrigerator, etc.	500	100	100	100	100
	Operations- 2300 HVAC	500	100	100	100	100
	Operations- 2300- Carpet upgrade and paint	10,000	100	100	100	100
	SUBTOTAL OPERATIONS	625,000	631,250	637,500	643,750	650,000
PHA Wide						
	Furniture & Blinds	1,000	1,000	1,000	1,000	1,000
	Ranges & Refrigerators	30,000	35,000	40,000	40,000	40,000
	Management Improvements- Staff & Education/Training / Correct Deficiencies	66,250	65,000	63,750	67,750	73,750
	* Training of HAC staff in operations, maintenance, accounting & financial procedures					
	* Training residents for agency or community employment. Teen Summer Work Program					
	* Correct management deficiencies. Improvements to management, financial & accounting control procedures. * Technical assistance to Resident Council					
	* Development and improvement of applicant screening procedures					
	Management Improvement- Security (signage, cameras, key machines, locks, etc.)	102,500	112,500	112,500	108,500	102,500
	Management Improvement- Systems (software, computers, copiers, telecom, etc.)	53,991	54,229	53,750	53,750	53,750
	Administration (Salaries/Benefits- CF related)	131,900	131,900	127,916	127,916	127,916
	Consultant Fees	47,500	40,000	40,000	40,000	40,000
	Consultant fees- Choice Neighborhood and/or Housing Development	10,000	10,000	10,000	10,000	10,000
	Architecture and Engineering Fees	130,000	111,867	100,000	100,000	100,000
	Development/Renovation of Purchasing Department/ Site work/ Relocation	95,937	260,430	269,690	276,674	285,424
	Development/ Renovation of Maintenance Shop / Offices / Site work/ Relocation	50,000	30,000	40,000	50,000	60,000
	Housing Development- Planning, Design, Finance, Demo, Abatement, Acquisition, Construction, Relocation, etc.	10,000	10,000	10,000	10,000	10,000
	Land Development	10,000	10,000	10,000	10,000	10,000
	Audit Costs for Capital Fund program	3,000	3,000	3,000	3,000	3,000
	Kiosk- 1650 Russell or other appropriate location	40,000	40,000	40,000	40,000	40,000
	SUBTOTAL PHA WIDE EXCLUDING OPERATIONS	\$782,078	\$914,926	\$921,606	\$938,590	\$957,340

COMMUNITY (AMP)	PROJECT	BUDGET CF24	BUDGET CF25	BUDGET CF26	BUDGET CF27	BUDGET CF28
GOLDEN TOWER	Replace acoustical ceiling	4,900	4,900	4,900	4,900	4,900
	Electrical/LED lighting (Units and Non Dwelling)	8,000	15,000	15,000	15,000	15,000
	Replace sanitary sewer lines and stacks (Units, Non Dwelling & Site)	15,000	10,000	10,000	10,000	10,000
	Replace waterlines, valves, backflow preventer, water heaters and pumps (Unit, Non dwelling and Site)					
	Storm line upgrades	8,000	15,000	15,000	15,000	15,000
	Replace toilets- energy efficient (Units and Non Dwelling)	5,000	5,000	5,000	5,000	5,000
	Replace all bath fixtures (toilets, showers, controls, cabinets, sinks and faucets)	5,000	5,000	5,000	5,000	5,000
	Replace roof system and flashing	8,000	20,000	20,000	20,000	20,000
	Replace roof system and flashing	5,000	5,000	5,000	5,000	5,000
	Paint corridors and stairwells / Replace common area flooring	8,000	15,000	15,000	15,000	15,000
	Upgrade apartment and common area flooring	8,000	20,000	20,000	20,000	20,000
	Replace windows, screens, and caulk	10,000	40,000	40,000	40,000	40,000
	Replace kitchen cabinets, countertops, sinks, faucets and range hoods	25,000	25,000	25,000	25,000	25,000
	Replace door handles from knobs to lever arm in stairwells	7,200	7,500	100	100	100
	Elevator upgrades (cab upgrades, braille buttons, hoist and governor replacement, door operator, protection system, etc.)					
	Concrete / Asphalt and stripping	5,000	10,000	10,000	10,000	10,000
	HVAC & Dampers- common area and PTAC units	10,000	20,000	20,000	20,000	20,000
	HVAC & Dampers- common area and PTAC units	17,800	14,700	14,900	14,900	14,900
	Mailboxes, package lockers, etc.	100	100	100	100	100
	Smoke detectors / Carbon monoxide detectors (NSPIRE protocol)	100	100	100	100	100
	Tuck-pointing / Caulking / Exterior painting/Window cleaning	100	100	100	100	100
	Unit & Building Renovation/Modernization/Relocation	50,000	13,000	12,700	12,700	12,700
	Lead Based paint assessment/Abatement & Relocation of Residents	100	100	100	100	100
	Accessibility and sensory assessment & correction if needed	100	100	100	100	100
	PNA Assessment	100	100	100	100	100
	Security Cameras	100	100	100	100	100
	SUBTOTAL GOLDEN TOWER	\$200,600	\$245,800	\$238,300	\$238,300	\$238,300

COMMUNITY (AMP)	PROJECT	BUDGET CF24	BUDGET CF25	BUDGET CF26	BUDGET CF27	BUDGET CF28
LATONIA TERRACE	Storm doors and hardware			5,000	5,000	5,000
	Electrical/LED lighting (Units, Non dwelling and Site)	10,000	15,000	15,000	15,000	15,000
	Water lines, valves, pumps and water heaters (Units, Non Dwelling and Site)	15,000	15,000	15,000	15,000	15,000
	Replace sewer lines (Units, Non Dwelling, and Site)	5,000	5,000	5,000	5,000	5,000
	Replace storm lines, catch basins, conductor lines, gutters/downspout, retention basin, drain tile, and erosion control	15,000	20,000	20,000	20,000	20,000
	Replace cabinets, sinks, tub, surround, controls and toilets at bathrooms	21,000	20,000	20,000	20,000	20,000
	Gas lines, valves and cathodic protection (Units and Site)	5,000	5,000	5,000	5,000	5,000
	Replace HVAC (Boilers, radiators, heat lines, valves or upgrade to split or chiller systems)	50,000	60,000	55,000	55,000	55,000
	Replace windows and screens	50,000	50,000	50,000	50,000	50,000
	Repair brick and mortar and seal concrete block	5,000	5,000	5,000	5,000	5,000
	Replace cabinets, countertops, sinks, faucets at kitchens	26,000	30,000	30,000	30,000	30,000
	Install exhaust fan and lights	14,000	14,000	14,000	14,000	14,000
	Upgrade apartment and common area flooring	5,000	5,000	5,000	5,000	5,000
	Upgrade accessible concrete ramps and railings	100	100	100	100	100
	Stabilize and/or construct retaining walls. Fencing at top of wall.	8,000	8,000	20,000	20,000	20,000
	Install bathroom medicine cabinets with lights	100	100	100	100	100
	Concrete / Asphalt and stripping	6,000	14,000	14,000	14,000	14,000
	Replace or repair playground equipment and ground cover	15,000	15,000	15,000	15,000	15,000
	Smoke detectors / Carbon monoxide detectors (NSPIRE protocol)	100	100	100	100	100
	Upgrade administration restroom at 2940 Madison	100	100	100	100	100
	Replace crawl space vents to prevent pest infiltration/ Seal penetrations in buildings to prevent pest infiltration	100	100	100	100	100
	Replace A/C units in community room	100	100	100	100	100
	Install measures or structure to prevent flooding of administration basement at 2940 Madison	10,000	10,000	100	100	100
	Regulators and Sensors/ Main water line relocation & pit	5,000	5,000	5,000	5,000	5,000
	Auto read electric meters	4,500	5,000	5,000	5,000	5,000
	Unit & Building Renovation/Modernization/Relocation/New Construction	137,840	11,800	54,500	54,500	54,500
	Lead Based paint assessment/Abatement & Relocation of Residents	100	100	100	100	100
	Accessibility and sensory assessment & correction if needed	100	100	100	100	100
	PNA Assessment	100	100	100	100	100
	Security Cameras	100	100	100	100	100
	SUBTOTAL Latonia Terrace	\$408,340	\$313,800	\$358,600	\$358,600	\$358,600

COMMUNITY (AMP)	PROJECT	BUDGET CF24	BUDGET CF25	BUDGET CF26	BUDGET CF27	BUDGET CF28
CITY HEIGHTS	City Heights Consultants for Disposition	5,000	5,000	100	100	100
	Relocation due to Disposition (DOT schedule and moving expenses, relocation consultant, resident utility debts, etc.)	50,000	250	100	100	100
	Clean out and secure vacant units due to Relocation due to Disposition	75,000	250	100	100	100
	Electrical, Load centers, disconnects, conduit and wiring	12,500	10,000	100	100	100
	Utility poles and components	12,076	10,000	100	100	100
	Storm and sanitary systems (Units, Non Dwelling and Site)	10,000	14,000	100	100	100
	Water lines, valves and water heaters (Units, Non dwelling and Site)	22,000	14,300	100	100	100
	Gas lines, valves and cathodic protection (Units and Site)	10,407	14,000	100	100	100
	Concrete / Asphalt and stripping	22,077	14,500	100	100	100
	Smoke detectors / Carbon monoxide detectors (NSPIRE protocol)	100	100	100	100	100
	Asbestos/ Lead Based paint assessment/Abatement & Relocation of Residents	100	100	100	100	100
	Accessibility and sensory assessment & correction if needed	100	100			
	PNA Assessment	100				
	HVAC systems	100	100	100	100	100
	Security cameras (Installation and removal)	100	100	100	100	100
	SUBTOTAL CITY HEIGHTS	\$219,660	\$82,800	\$1,300	\$1,300	\$1,300
EMERY DRIVE	Replace kitchen/ bath cabinetry, sinks, faucets, countertops.	1,000	1,000	500	500	500
	LED lighting, emergency exit lighting and electrical (Site, Units and Non Dwelling)	500	500	500	500	500
	Water lines, valves, apartment shutoff valves, water heaters, etc. (Units, Non Dwelling and Site)	1,000	1,600	1,600	1,600	1,600
	Replace bathtubs, surrounds, and controls	1,200	2,000	3,000	3,000	3,000
	Upgrade apartment and common area flooring	3,667	3,282	3,577	4,404	4,404
	Upgrade Boiler and HVAC (Units and Non Dwelling)	1,250	1,200	1,200	1,200	1,200
	Upgrade windows, paint and caulking	2,000	2,000	2,000	2,000	2,000
	Upgrade patio doors, decks and railings	2,200	2,000	3,000	2,000	2,000
	Building Envelope- roof, gutters, downspouts, siding, soffits, trim, tuckpointing, exterior painting, caulking, wall & attic insulation, etc.	1,000	1,000	1,000	1,000	1,000
	Replace metal stair at 1016 / Replace fire escapes at 1020 and 1030	1,300	1,300	1,800	1,800	1,800
	Stabilize erosion and hillside slippage	2,000	2,000	1,000	2,000	2,000
	Upgrade laundry facilities (6 washers and 8 dryers)					
	Water infiltration system	1,000	1,000	500	500	500
	Smoke detectors / carbon monoxide detectors (NSPIRE protocol)	1,000	1,000	1,000	1,000	1,000
	Lead Based paint assessment/Abatement & Relocation of Residents	100	100	100	100	100
	Accessibility and sensory assessment & correction if needed	100	100	100	100	100
	PNA Assessment	100	100	100	100	100
	SUBTOTAL EMERY DRIVE	\$19,417	\$20,182	\$20,977	\$21,804	\$21,804

COMMUNITY (AMP)	PROJECT	BUDGET CF24	BUDGET CF25	BUDGET CF26	BUDGET CF27	BUDGET CF28
ESR I	Concrete / Asphalt/ Stripping					
	MEP- HVAC / Electrical (includes Lighting)/ Plumbing (waterlines, valves, water heaters, etc.)	6,000	12,000	12,000	12,000	12,000
	Replace kitchen/ bath cabinetry, countertops, sinks and faucets.	12,000	18,000	18,000	18,000	18,000
	Building Envelope- windows, roofs, gutters, downspouts, siding, soffits, trim, tuck-pointing, exterior painting, caulking, seal penetrations from pest and provide on way egress, etc.	1,000	1,000	1,000	1,000	1,000
	Upgrade apartment and common area flooring	1,000	1,000	1,000	1,000	1,000
	Smoke detectors / Carbon monoxide detectors (NSPIRE protocol)	1,000	1,000	1,000	1,000	1,000
	Waterproof basement walls / Cap basement dirt floors with concrete	1,000	1,000	1,000	1,000	1,000
	Fencing	900	900	900	900	900
	Lead Based paint assessment/Abatement & Relocation of Residents	100	100	100	100	100
	Accessibility and sensory assessment & correction if needed	100	100	100	100	100
	Replace Beam and Floor Joists	100	100	100	100	100
PNA Assessment	100	100	100	100	100	
SUBTOTAL ESR I		\$23,300	\$35,300	\$35,300	\$35,300	\$35,300
ESR II	Building Envelope- windows, roofs, gutters, downspouts, siding, soffits, trim, tuck-pointing, wall & attic insulation, exterior painting and caulking	6,654	3,599	4,564	5,046	5,046
	Smoke detectors / Carbon monoxide detectors (NSPIRE Protocol)	500				
	MEP- HVAC / Electrical (includes Lighting)/ Plumbing (waterlines, valves, water heaters, etc.)	1,500	1,500	1,500	1,500	1,500
	Replace kitchen/ bath cabinetry, countertops, sinks & faucets.	500	5,000	4,000	4,000	4,000
	Concrete / Asphalt/ Stripping	1,000	1,000	1,000	1,000	1,000
	Fencing	1,000	1,000	1,000	1,000	1,000
	Lead Based paint assessment/abatement & Relocation of Residents	100	100	100	100	100
	Accessibility and sensory assessment & correction if needed	100	100	100	100	100
	PNA Assessment	100	100	100	100	100
	SUBTOTAL ESR II	\$11,454	\$12,399	\$12,364	\$12,846	\$12,846
	ESR III	Building Envelope- windows, roofs, gutters, downspouts, siding, soffits, trim, tuck-pointing, wall & attic insulation, exterior painting and caulking	2,000	4,984	5,423	5,280
Smoke detectors / Carbon monoxide detectors (NSPIRE Protocol)						
MEP- HVAC / Electrical (includes Lighting)/ Plumbing (waterlines, valves, water heaters, etc.)		1,000	1,000	1,500	1,500	1,500
Replace kitchen/ bath cabinetry, countertops, sinks & faucets.		5,562	3,000	3,000	3,100	3,100
Concrete / Asphalt/ Stripping		1,000	1,000	500	1,000	1,000
Fencing		1,000	1,000	1,000	1,000	1,000
Lead Based paint assessment/abatement & Relocation of Residents		100	100	100	100	100
Accessibility and sensory assessment & correction if needed		100	100	100	100	100
PNA Assessment		100	100	100	100	100
SUBTOTAL ESR III		\$10,862	\$11,284	\$11,723	\$12,180	\$12,180

COMMUNITY (AMP)	PROJECT	BUDGET CF24	BUDGET CF25	BUDGET CF26	BUDGET CF27	BUDGET CF28
ACADEMY FLATS	HVAC (Units and Non Dwelling)	15,000	55,100	65,000	65,000	65,000
	Exterior painting and caulking	5,000	5,000	5,000	5,000	5,000
	Concrete/ Asphalt and stripping	8,000	8,000	8,000	8,000	8,000
	Flooring, painting, electrical (lighting) at common areas	8,000	10,000	10,000	10,000	10,000
	Plumbing (waterlines, valves, water heaters, pumps, shower stalls, dishwashers, etc.)	1,000	1,000	1,000	1,000	1,000
	Upgrade elevator and components	1,000	1,000	1,000	1,000	1,000
	Waterproof foundation wall	10,501	1,000	1,000	1,000	1,000
	Shelter/Gazebo	20,000	1,000	1,000	1,000	1,000
	Smoke detectors / Carbon monoxide detectors (NSPIRE Protocol)	100				
	Replace Windows	2,800	12,700	54,800	54,800	54,800
	Sewers, Storm, catch basins, conductor lines, erosion, etc.	10,000	1,000	1,000	1,000	1,000
	Upgrade apartment and common area flooring	1,000	1,000	1,500	1,500	1,500
	Lead Based paint assessment/Abatement & Relocation of Residents	100	100	100	100	100
	Accessibility and sensory assessment & correction if needed	100	100	100	100	100
	Replace exterior or interior doors	9,900	5,000	5,000	5,000	5,000
Seal attic penetrations	100	100	100	100	100	
Electrical including lighting and emergency lights	100	100	100	100	100	
Security Cameras	100	100	100	100	100	
PNA Assessment	100	100	100	100	100	
SUBTOTAL ACADEMY FLATS		\$92,901	\$102,400	\$154,900	\$154,900	\$154,900
NSP	Concrete / Asphalt/ Stripping	1,000	1,000	1,000	1,000	1,000
	Plumbing (waterlines, valves, water heaters, etc.)	4,000	7,000	8,000	8,000	8,000
	HVAC/ Electrical (includes Lighting)	23,000	60,000	60,000	60,000	60,000
	Building Envelope- windows, roofs, gutters, downspouts, siding, soffits, trim, tuck-pointing, exterior painting, caulking, fencing, seal penetrations from pest and provide on way egress, etc.	10,000	13,000	12,000	12,000	12,000
	Smoke detectors/ carbon monoxide detectors (NSPIRE protocol)	100				
	Upgrade apartment and common area flooring	5,900	9,000	9,000	9,000	9,000
	Lead Based paint assessment/Abatement & Relocation of Residents	100	100	100	100	100
	Accessibility and sensory assessment & correction if needed	100	100	100	100	100
	PNA Assessment	100	100	100	100	100
	SUBTOTAL New Site Properties	\$44,300	\$90,300	\$90,300	\$90,300	\$90,300

COMMUNITY (AMP)	PROJECT	BUDGET CF24	BUDGET CF25	BUDGET CF26	BUDGET CF27	BUDGET CF28
RIVER'S EDGE	Building Envelope- Windows, roofs, gutters, downspouts, siding, soffits, trim, tuck-pointing, exterior painting and caulking	15,000	20,000	25,000	25,000	25,000
	Smoke detectors / Carbon monoxide detectors (NSPIRE protocol)					
	Concrete / Asphalt and stripping	11,788	12,000	12,000	12,000	12,000
	HVAC/ Electrical (includes lighting and emergency lights	9,000	10,000	8,000	8,000	8,000
	Plumbing (waterlines, valves, pumps, water heaters, etc.)	7,000	7,000	6,000	6,000	6,000
	Fencing	1,000	2,000	2,000	2,000	2,000
	Upgrade apartment and common area flooring	10,000	5,259	5,830	5,830	5,830
	Security cameras, security lights, access controls, signage	5,000	5,000	5,000	5,000	5,000
	Ranges & refrigerators (Units)	3,000	3,000	3,000	3,000	3,000
	Lead Based paint assessment/Abatement & Relocation of Residents	100	100	100	100	100
	Accessibility and sensory assessment & correction if needed	100	100	100	100	100
	PNA Assessment	100	100	100	100	100
	SUBTOTAL RIVER'S EDGE at EASTSIDE POINTE	\$62,088	\$64,559	\$67,130	\$67,130	\$67,130
	GRAND TOTAL AGENCY WIDE	\$2,500,000	\$2,525,000	\$2,550,000	\$2,575,000	\$2,600,000

2024 PHA Annual Plan Attachment B.1 Financial Resources

Housing Authority #	Housing Authority Name	Fiscal Year Begin Date
KY002	Housing Authority of Covington (HAC)	July 1, 2023

[24 CFR Part 903.7] This statement must address the financial resources that are available to the PHA for the support of Federal public housing and Section 8 tenant-based assistance programs administered by the PHA during the plan year.

The statement must include a listing, by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned uses for the resources.

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FFY 2024 grants)		
a) Public Housing Operating Fund	\$3,275,774	
b) Public Housing Capital Fund	\$0	
c) HHERF	\$0	
d) HOPE VI Demolition	\$0	
e) Annual Contributions for Section 8 Tenant- Based Assistance	\$6,915,895	
f) Public Housing Drug Elimination Program (including any	\$0	
g) Resident Opportunity and Self-Sufficiency Grants FSS-S8	\$38,375	
g) Resident Opportunity and Self-Sufficiency Grants - FSS	\$21,233	
i) Community Development Block Grant	\$0	
j) HOME	\$0	
2. Other Federal Grants		
2024 Capital Fund (Estimate)	\$2,500,000	LIPH Capital Improvement
3. Prior Year Federal Grants (unobligated funds only) (list below)		
2023 Capital Fund Program	\$2,385,374	LIPH Capital Improvement
2022 Capital Fund Program	\$1,067,626	LIPH Capital Improvement
2021 Capital Fund Program	\$0	LIPH Capital Improvement
2020 Capital Fund Program	\$245,161	LIPH Capital Improvement
2019 Capital Fund Program	\$47,871	LIPH Capital Improvement
4. Public Housing Dwelling Rental Income	\$1,560,000	
5. Non-federal sources (list below)		
Interest Income	\$16,399	
6. Non-federal sources (list below)		
Rooftop Rental	\$52,800	
Total resources	\$18,126,508	