



AGENDA

FOR THE REGULAR MEETING OF THE LOS ANGELES COUNTY HOUSING ADVISORY COMMITTEE WEDNESDAY, MARCH 20, 2024, 12:00 PM

Primary location:
LACDA Headquarters
700 West Main Street
Alhambra, California 91801

Alternate location (teleconference only):
West Hollywood Library
Study Room C
652 N San Vicente Blvd
West Hollywood, California 90069

To join via phone, dial **(747) 200-6781**, then enter **525 710 562#** when prompted.

[Click here to join the meeting](#)

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1. **Call to Order**

2. **Roll Call**

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



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



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

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

Regular Meeting of February 21, 2024

4. **Report of the Executive Director**

5. **Presentations**

Family Self-Sufficiency Graduate

Housing Success Story and Client Testimony

Housing Opportunity Through Modernization Act (HOTMA)

6. **Public Comments**

Regular Agenda

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

Recommend that the Board of Commissioners:

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

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

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

Authorize the Executive Director or his designee to execute all documents required to receive HUD-allocated CFP funds in the amount of approximately \$9,000,000.

Authorize the Executive Director or his designee to incorporate into the Annual Plan all public comments received and approved for inclusion by the Board; and authorize the Executive Director or his designee to submit the Annual Plan to HUD by April 17, 2024.

Full Annual Plan document available at: <https://www.lacda.org/section-8/shared-info/public-documents>

8. Commissioner Comments or Suggestions for Future Agenda Items

Access to the agenda and supporting documents are available on the LACDA website. Agendas in Braille are available upon request. American Sign Language (ASL) interpreters, or reasonable modifications to Housing Advisory Committee meeting policies and/or procedures, to assist members of the disabled community who would like to request a disability-related accommodation in addressing the Commission, are available if requested at least four business days prior to the meeting. Later requests will be accommodated to the extent possible. Please contact the Executive Office of the LACDA by phone at (626) 586-1855 from 8:00 a.m. to 6:00 p.m., Monday through Thursday, or by e-mail at nick.teske@lacda.org.

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

Wednesday, February 21, 2024

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

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

The meeting was called to order by Commissioner Brooks at 12:06 p.m.

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

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

On motion by Commissioner Knight, seconded by Commissioner Lock, the minutes of the Regular Meeting of January 24, 2024 were approved as presented.

Agenda Item No. 4 – Report of the Executive Director

Chief of Programs Tracie Mann welcomed attendees to the meeting. She reported that LACDA programs are still operating under the federal government’s third continuing resolution that Congress passed to continue funding the government as they work to pass the Fiscal Year 2024 budget. Leaders of the U.S. House of Representatives and Senate Transportation, Housing and Urban Development (THUD) Appropriations subcommittees announced on February 16, 2024, that they had reached a deal on final Federal Fiscal Year (FFY) 2024 funding levels for HUD’s vital housing and homelessness programs. The announcement came ahead of a two-week-long House recess. Senate members were set to return on February 26, and the House members on February 28. Members have only until March 1, 2024 – just three days after the House reconvenes – to finalize and enact four FFY 2024 appropriations bills, including the THUD bill. The remaining eight bills were due to expire on March 8, 2024.

While agreements over funding levels have been reached, the THUD bill text had yet to be released because disagreements over policies that should be included in the funding bill remain, as members of the House Freedom Caucus (HFC) continue pushing for conservative policy riders to be included. Funding for HUD's programs was set to expire on March 1, 2024, at which point Congress would need to pass a final bill, enact another continuing resolution, or face a partial government shutdown.

Tracie reported that the LACDA is on the tail-end of finalizing our annual budget, and budget uncertainties at the federal level make it difficult for us to plan appropriately. The best-case scenario is proposing a conservative budget and hoping for a robust federal budget. The worst-case scenario is that we continue with level funding based on FFY23, which may likely decrease services to our clients.

Tracie reported that on February 1, 2024, purge letters were sent to 74,000 registrants on the Section 8 and Public Housing waiting lists. Recipients had until March 1, 2024 to update their information and remain active on the waiting lists by accessing the waiting list portal, or those needing assistance could contact staff during regular business hours. The LACDA purges our waitlist periodically to remove individuals who are no longer interested, have moved out of jurisdiction, etc. This makes it more efficient to fill slots when we send out applications. As of February 24, 2024, a little over 11,000 responses had been received.

Tracie provided an update on past-due rents in Public Housing following the expiration of the eviction moratorium last year. We currently have over \$1.9 million in rent arrearages, with approximately \$1.4 million delinquent as of May 2023 and roughly \$200,000 in delinquency accumulated monthly. This is detrimental to operations because rent revenues are needed to address property deficiencies and have funding to make necessary repairs. Adding to the problem is lower funding from HUD for Public Housing Operating Funds, for which the proration decreased from 100% to 87%, creating a budget shortfall. The Housing Operations Division (HOD) team is gearing up to send courtesy notices to those residents with rent arrearages to meet with the property manager to bring rent payments current and possibly establish repayment agreements, if necessary. The next step will be to engage with our legal counsel and prepare for eviction actions.

On Friday, February 9, 2024, members of the HOD team met with Thomas Davis, Director of HUD's Office of Recapitalization, and representatives from our local HUD field office to discuss our plans and goals for the Rental Assistance Demonstration (RAD) program. RAD program was created to give public housing agencies a tool to preserve and improve properties and address the nationwide backlog of deferred maintenance. The total cost for our maintenance needs exceeds \$100 million due to an aging housing stock.

RAD allows public housing agencies to leverage public and private debt and equity to reinvest in the public housing stock. This is critical given the backlog of public housing capital needs - estimated at over \$35 billion. In RAD, units move to a Section 8 platform with a long-term contract that, by law, must be renewed in perpetuity. This ensures that the units remain permanently affordable to low-income households. Residents benefit

from a right of return, a prohibition against re-screening, and robust notification and relocation rights. Residents continue to pay 30% of their adjusted income towards the rent, maintain the same fundamental rights as they possess in the public housing program, and gain a new option to request tenant-based assistance if they wish to move from the property subsequently. RAD maintains the ongoing public stewardship of the converted property through clear rules requiring ongoing ownership or control by a public or non-profit entity. A timeline for this work is in process, and much back-end work is needed, including notifying the Board offices of our plan. The RAD conversion is being added to the Annual Plan.

Agenda Item No. 5 - Presentations

Ballot Measure Presentation – United Way of Greater Los Angeles

Agenda Item No. 6 – Public Comments

Patricia McAllister

Agenda Item No. 7 – Approve Significant Amendment to the Annual Plan (All Districts)

On motion by Commissioner Knight, seconded by Commissioner Lloyd, with Commissioner Myers abstaining, the following was approved:

Recommend that the Board of Commissioners:

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

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

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

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

Agenda Item No. 8 – Commissioner Comments or Suggestions for Future Agenda Items

The meeting was adjourned at 1:15 p.m.

Respectfully submitted,


A handwritten signature in blue ink, appearing to read "Emilio Salas". The signature is written in a cursive style with a horizontal line underneath it.

EMILIO SALAS
Executive Director
Secretary-Treasurer



March 20, 2024

TO: Housing Advisory Committee

FROM: Medina D. Johnson-Jennings, Director 
Housing Assistance Division

RE: **FSS PROGRAM UPDATE –FEBRUARY 2024**

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

ACTIVITIES

NUMBER CURRENTLY ENROLLED	333	As of March 1, 2024 , there were 296 Housing Choice Voucher (HCV) and 37 Public Housing (PH) FSS participants.
NEW ENROLLMENTS	4	(4) Housing Choice Voucher (HCV) and (0) for Public Housing (PH).
CONTRACTS EXPIRED	2	(2) FSS contracts expired for Housing Choice Voucher (HCV) and (0) for Public Housing (PH).
DIRECT ASSISTANCE REFERRALS	745 539 512 365 301 175 102 90 8 6 0 6	Job Referrals Work Source/Job Fairs Educational/Vocational/Job Training Financial Literacy Home Ownership Counseling Credit Repair Other/Utility/Legal Aid Covid-19/Childcare Services Computer Training Small Business Youth Services IDA Free Tax Prep Pop-up Sites
OUTREACH & COMMUNITY EVENT	2	Credit and Money Management Workshop, FSS Program Orientation,
GRADUATIONS	2	(1) Request for Graduation for Housing Choice Voucher (HCV) and (1) for Public Housing (PH).

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

Attachment



March 20, 2024

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

Dear Commissioners:

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

SUBJECT

This letter recommends approval of the Los Angeles County Development Authority's Annual Plan for Fiscal Year 2024-2025. The Annual Plan updates the LACDA's program goals, major policies, and financial resources. Submission of the Annual Plan is required by the U.S. Department of Housing and Urban Development for receipt of Capital Fund Program (CFP) funds, operating funds for the Public Housing Program, and administrative fees for the Housing Choice Voucher Program.

IT IS RECOMMENDED THAT THE COMMITTEE:

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



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3. Recommend that the Board of Commissioners adopt and instruct the Chair to sign the attached Resolution approving the Annual Plan for submission to HUD and authorize the Executive Director or his designee to take all actions required for the implementation of the Annual Plan.
4. Recommend that the Board of Commissioners authorize the Executive Director or his designee to execute all documents required to receive HUD-allocated CFP funds in the amount of approximately \$9,000,000.
5. Recommend that the Board of Commissioners authorize the Executive Director or his designee to incorporate into the Annual Plan all public comments received and approved for inclusion by the Board; and authorize the Executive Director or his designee to submit the Annual Plan to HUD by April 17, 2024.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

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

The Annual Plan identifies major program policies and financial resources and updates information on housing needs, waiting lists, housing strategies, program policy changes, and other program and management data. The Annual Plan must be updated each year and was last approved by the Board on April 6, 2023.

FISCAL IMPACT/FINANCING

There is no impact on the County general fund. Upon Board approval of the Annual Plan, the LACDA will receive about \$9,000,000 in CFP funds from HUD for management improvements, administrative costs, and housing rehabilitation for the Public Housing Program. Operating funds for the Public Housing Program and administrative fees for the HCV Program will be approved through the annual budget process.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

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

CAPITAL FUND ANNUAL STATEMENT

The Fiscal Year 2024-2025 Capital Fund Annual Statement summarizes the LACDA's plan to use modernization funds for management improvements, administrative costs and to rehabilitate 2,067 housing units at 18 Public Housing Program developments.

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

Admissions and Continued Occupancy Policy for the Public Housing Program

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

1. Interim Re-Examination Timeline

Currently, the Public Housing program requires residents to report changes to income within ten (10) calendar days of the occurrence. The family is responsible for providing supporting documents at the time of their notification. The LACDA provides residents three (3) days to submit additional requested documents when necessary.

Effective July 1, 2024, the LACDA is proposing to extend the timeframe from three (3) days to fifteen (15) days to allow the family ample time to provide the LACDA with the requested supporting documents. The LACDA may grant an extension for extenuating circumstances. However, if the family is non-responsive by the due date to a request for documentation, the family will be advised in writing that the LACDA will not process the rent decrease and must start the process again if they want to receive the decrease. Should the family start the process again, the LACDA will not retroactively apply the rent decrease adjustment.

Housing Choice Voucher (Section 8) Program Administrative Plan

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

1. Income Exclusions – Permissive Deductions

Under the broad definition of income, HUD permits public housing agencies (PHAs) the discretion to use certain funds received by the family, such as income from research studies, as permissive deductions based on their policies. Since research-study-type funds would not fall into any of HUD's income exclusions and would be considered income under its rules, the PHA must adopt the income type as an excludable income under discretionary policy. HUD requires that the funds

received by the family be included in the calculation of income and excluded when the family demonstrates that the funds will not be received in the coming year.

As a discretionary policy, and to align with current Public Housing policy, the LACDA is proposing for the Section 8 tenant-based programs to exclude income for research-related supplemental cash payments that are similar to Universal Basic Income (UBI), also known in California as the Guaranteed Income Pilot or Guaranteed Income Program, in such that a specific family is given a monthly income supplement to assist with quality-of-life research data. These payments would be excluded from income calculations but must be reported at the initial receipt and annually thereafter.

2. Family Obligations

Participating families of the Section 8 tenant-based programs have a list of obligations that outline the family's responsibilities and prohibited actions. When the family's unit has been approved by the LACDA and the Housing Assistance Payments (HAP) contract has been executed, the family is expected to meet the obligations in order to receive continued rental assistance. Included in the Family Obligations is the requirement that all participating families allow the LACDA to inspect the unit at reasonable times and after reasonable notice.

Effective July 1, 2024, the Section 8 tenant-based programs Family Obligations will now include the following requirement:

The family must allow the LACDA and/or owner to inspect the unit at reasonable times and after reasonable notice and allow the property owner/manager access to the unit to make repairs.

The inclusion of this rule is to clarify that the owner must be provided entry to the unit to ensure that Housing Quality Standards are addressed, and that the unit is safe and habitable for the family.

3. Stability Vouchers Program

The Consolidated Appropriations Act, 2021 (Public Law 116-260) (2021 Act), made available \$43,439,000 for new incremental voucher assistance under Section 8(o) of the United States Housing Act of 1937 for use by individuals and families experiencing or at-risk of homelessness, those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, and veterans and families that include a veteran family member that meets one of the criteria.

On August 16, 2022, HUD issued PIH Notice 2022-24, announcing approximately 4,000 new incremental vouchers nationwide for the new Stability Voucher (SV) program. On June 5, 2023, the LACDA received 288 SVs that will be paired with

Continuum of Care supportive services funded by HUD's Office of Community Planning and Development.

The LACDA is hereby proposing to amend its Administrative Plan to implement Chapter 21 Stability Vouchers Program. Chapter 21 maintains policies that deviate from the Section 8 program or are exclusively for the administration of the SV program. Among the Chapter sections is an Introduction to the SVs; SV Eligibility Requirements; Alternative Requirements, Waiting List Administration, Portability, and Definitions pertaining to eligibility.

4. Admissions

Language has been added to Chapter 4 of the Administrative Plan to allow more flexibility in the receipt and/or issuance of program applications via alternate mediums.

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

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

1. Net Asset Limitation for New Admissions that Exceed \$100,000

Currently, the LACDA does not have restrictions on net family asset limitations for new program admissions.

Upon further guidance and HUD implementation of the Housing Opportunity Through Modernization Act of 2016 (HOTMA), the LACDA will modify its policies to conform to the mandated restrictions based on net assets.

The LACDA will deny admission to an applicant family for the following reasons:

- Net family assets that exceed \$100,000. This amount is subject to HUD's annual inflationary adjustment in accordance with the Consumer Price Index (CPI); and/or
- The family has a present ownership interest in, a legal right to reside in, and the legal authority to sell the real property that is suitable for occupancy by the family as a residence.

The LACDA does not have the authority to establish discretionary policy under this rule.

2. Net Asset Limitation for Existing Families that Exceed \$100,000

Currently, the LACDA does not have restrictions on net family asset limitations for existing participating families.

As required by HUD, the LACDA will initiate eviction (Public Housing) or termination (Section 8) of a family's assistance no later than six months after the effective date of an annual or interim for the following reasons:

- Net family assets that exceed \$100,000. This amount is subject to HUD's annual inflationary adjustment in accordance with the CPI; and/or
- The family has a present ownership interest in, a legal right to reside in, and the legal authority to sell the real property that is suitable for occupancy by the family as a residence.

As required by HUD, the LACDA will provide the affected families the opportunity to cure the asset limitations from the effective date of the annual or interim re-examination through the end of their six (6) month end period.

LACDA is not adopting any discretionary policies pertaining to the asset limitation provisions.

3. Self-Certification of Real Property Ownership

Currently, the LACDA verifies ownership of real property at admissions and annual re-examination through generated third-party verification for purposes of imputing income from assets. Furthermore, the LACDA does not have any restrictions for ownership of real property for purposes of admission to the program.

As required by HUD, the LACDA will deny admission to the program when a family declares ownership of real property and the property is suitable for occupancy by the family in accordance with HUD's asset restrictions. However, HUD issued an exception to the restriction against real property for denials of admission when:

- The family does not have the legal right to reside in the property;
- The family does not have the legal authority to sell the property (i.e., due to litigation, fractional ownership, sale, or divorce);
- The property is not suitable for occupancy by the family as a residence (i.e., unsafe);
- The property is geographically located so that the distance or commuting time between the property and the family's place of work or a family member's educational institution would create a hardship for the family;
- Unit does not meet the disability-related needs of the family; or
- The property is not sufficient for the size of the household.

The LACDA will require third-party generated verification for the reasons noted above for purposes of determining program eligibility.

For victims of domestic violence, dating violence, sexual assault, stalking, as well as verbal, psychological, economic, or technological abuse that cannot provide the third-party generated verification, the LACDA must accept a self-certification from the family member who is the victim, and the restrictions on requesting documentation apply under § 5.2007.

4. Self-Certification of Net Family Assets Equal to or Less Than \$50,000

Currently, the LACDA accepts an existing family's self-certification where the family has net assets equal to or less than \$5,000, without taking additional steps to verify the accuracy of the declaration during a re-examination review.

As required by HUD, the LACDA will update the current policy to increase the net asset threshold from \$5,000 to \$50,000. The LACDA will accept the family's self-certification stating the amount of income the family expects to receive from such assets equal to or less than \$50,000, and the amount is included in their annual income. This amount is subject to HUD's annual inflationary adjustment in accordance with the CPI.

As a discretionary policy, the LACDA will accept the family's self-certification at admissions to the program without taking additional steps to verify the accuracy of the declaration when the family cannot provide third-party verification. The LACDA will require the family to provide third-party generated documents as required by HUD guidance.

5. Hardship Exemptions for Health/Medical Care Expenses & Reasonable Attendant Care & Auxiliary Apparatus Expenses – General Relief (Hardship)

Currently, the LACDA does not define financial "hardship" in relation to Health/Medical Care Expenses & Reasonable Attendant Care & Auxiliary Apparatus expenses. LACDA currently refers to the Internal Revenue Service (IRS) Publication 502 definition for medical, dental expenses, etc., as may be amended from time to time by the IRS.

In accordance with HUD, the LACDA is required to define financial hardship for purposes of granting a relief for a period of 90 calendar days when the families' health/medical and attendant/auxiliary expenses exceed the HUD-mandated thresholds as a result of the change in this regulation.

As a discretionary policy, the LACDA is hereby defining hardship as circumstances limited to the following:

- Circumstances where the family experiences a loss of income and is expected to continue for an undetermined period;
- Imputed welfare (excluding fraud); or
- Increase in utility rates (for Public Housing only)

An elderly or disabled family or a family that includes a person with disabilities may request a hardship exemption to the limitations above when the family experiences a financial hardship due to the change in this regulation. The LACDA reasonable accommodation processes will apply. On a case-by-case basis, the LACDA may grant an additional 90-day extension, not to exceed 180 days, while the family's hardship continues.

It should be noted that in all cases, the family's hardship relief ends when the circumstances that made the family eligible for the financial relief are no longer applicable or after 90 days, whichever comes earlier.

6. Hardship Exemptions for Health/Medical Care Expenses & Reasonable Attendant Care & Auxiliary Apparatus Expenses – Phased-In Relief

Currently, the LACDA does not have a phased-in relief policy for families with Health/Medical Care, Reasonable Attendant Care, and Auxiliary Apparatus out of pocket expenses that exceed the current three (3) percent threshold of the family's gross annual income to the new mandated ten (10) percent threshold.

In accordance with HUD, the LACDA will increase the current 3 percent to 10 percent and will begin the 24-month phased-in relief for families currently receiving HUD's allowable health/medical deduction for unreimbursed out-of-pocket expenses based on the family's re-examination preceding January 1, 2024.

The phase-in relief will commence at the family's next annual or interim re-examination, whichever occurs first after January 1, 2024, as follows:

- 1st twelve months – expenses more than 5 percent of the family's annual gross income.
- 2nd twelve months – expenses more than 7.5 percent of the family's annual gross income.

At the conclusion of the 24-month phase-in, the 10 percent threshold will be applied, and the family will be eligible for this deduction if their expense exceeds the 10 percent threshold.

A family receiving phased-in relief in accordance with HUD's implementation may request in writing a hardship exemption. However, the family will be ineligible to resume the phase-in relief if the hardship exemption is granted.

New admissions and existing families previously not receiving the allowable deduction will automatically be applied the mandated 10 percent and will not be eligible for the phased-in relief.

The LACDA does not have authority to establish discretionary policy under this rule.

7. Hardship Exemption to Continue Childcare Expense Deduction

Currently, HUD's rules and the LACDA's policy allow for a deduction from the family's annual gross income for any reasonable childcare expenses necessary to enable a member of the family to be employed or to further his or her education.

In accordance with HUD, the LACDA must implement a policy that allows a family to request a hardship exemption for childcare expenses when the family is no longer eligible for the childcare deduction.

As a discretionary policy, the LACDA hereby defines financial hardship as any of the following circumstances for purposes of determining eligibility for a hardship exemption:

- Temporary loss of income for a period not to exceed 90 calendar days and childcare is still necessary;
- Increase in utility rates that exceed the HUD-established threshold for implementing the new rates and allowances;
- Adult family member(s) participating in higher education/vocational training and other adult members in the home are unable to care for the minor(s);
- Expense is necessary to continue the child's enrollment at the childcare facility or in accordance with their childcare contract; or
- Increase in childcare expense and the increase is in excess of 40 percent of the family's annual adjusted income.

The LACDA will require the family to request the financial hardship in writing within 10 calendar days from the loss of the childcare deduction resulting in financial hardship and inability to pay rent.

The LACDA will obtain third-party verification to determine the family's financial hardship resulting in their inability to pay rent. The exemption will be granted for a period of 90 calendar days. The family's hardship exemption ends when the circumstances that made the family eligible for the exemption are no longer applicable or after 90 days, whichever comes earlier.

8. De Minimis Errors in Income Determinations

In accordance with HUD, the LACDA must take corrective action to credit or repay a family if the family was overcharged tenant rent because of de minimis errors in calculating family income. However, the LACDA must not implement local policies to require a family to repay in instances resulting in a family being undercharged for rent when the LACDA miscalculated the family's income.

De minimis is defined as a PHA calculation error of \$30 or less of the family's monthly adjusted income (or \$360 in annual adjusted income). The provision enables the LACDA to make a de minimis error income determination on a family-by-family basis rather than having HUD conduct a full portfolio review if the LACDA exceeds the threshold.

As required by HUD, under corrective action, the LACDA will grant the family credit toward future rents when it is discovered that there is a rent overcharge due to an administrative error calculation. The family is issued a credit retroactively to the effective date of the action when the error was made, regardless of the dollar amount associated with the administrative error.

9. Interim Re-examinations - Decreases in Adjusted Annual Income

Currently, the LACDA processes interim re-examinations for families that experience a loss or decrease in their income and changes in family composition.

In accordance with HUD, the LACDA may decline to conduct an interim re-examination of family income if the LACDA estimates that the family's annual adjusted income will decrease by an amount that is less than ten (10) percent or such lower threshold.

As a discretionary policy, the LACDA will not establish a threshold of 10 percent or less. LACDA reaffirms it will continue to exercise its current interim re-examination policy for all **decreases** in the family's adjusted income or changes in family composition when a family reports the changes in writing.

10. Interim Re-examinations - Increases in Adjusted Annual Income

Currently, families are required to report all changes in earned and unearned income, assets, expenses, full-time student status, and family circumstances within 10 calendar days of the date the change takes effect. For Public Housing only, interims are processed only when there is an income increase in existing income of \$200 per month or more.

In accordance with HUD and as a discretionary policy, the LACDA will require the families to continue reporting for both Public Housing and Section 8. However, as

required by HUD, Public Housing will now eliminate the \$200 threshold. Public Housing and Section 8 will now conduct an interim re-examination when the family's annual adjusted income has changed by an amount that would result in an estimated increase of ten (10) percent or more in annual adjusted income or other amount established through HUD notice.

HUD allows other discretion relevant to interim re-examinations. As a discretionary policy, the LACDA will not conduct interim re-examinations if a family reports an increase in income within three (3) months of their next annual re-examination effective date. Instead, the reported change will be processed with the annual re-examination.

11. Interim Re-examinations - Reporting Changes & Effective Date

Currently, the LACDA requires that families report any changes in family income and composition in writing within ten (10) calendar days of when the change occurs. Any additional information, necessary documents, or signature needed from the family to verify the change must be provided within 15 calendar days from the date of request.

HUD requires the LACDA to develop policies stating when and under what conditions families must report changes in family composition and adjusted income.

As a discretionary policy, the LACDA requires families to report their changes in writing within 10 calendar days from when the changes occur.

As required by HUD, the LACDA currently has the following discretionary policies in place that align with the mandated HOTMA changes.

- If the family delays or fails to report changes in family circumstances that result in a decrease in tenant rent, it will be considered untimely reporting. The change will be effective on the first of the month following completion of processing by the LACDA and not retroactively.
- If the family fails to report the changes in family circumstances and the change results in a rent increase, the family will be issued a 30-day rent increase notice and the LACDA will initiate a retroactive tenant payment agreement to the first of the month following the date of change.

As a discretionary change, Public Housing is proposing to change its policy to increase the time to provide additional information from 3 calendar days to 15 calendar days.

12. Revocation of Consent Form (Form HUD-9886A Authorization for the Release of Information/Privacy Act Notice)

Currently, the LACDA must deny or terminate assistance for failure to sign and submit HUD-mandated consent and release forms deemed necessary to allow the LACDA to obtain financial verification to determine the family's initial or continued eligibility.

As required by HUD, the LACDA will add language to its existing policies to align with HUD and HOTMA provisions regarding the revocation of consent forms.

Upon approval from the Office of Management Budget (OMB) of the revised Form HUD-9886A, the LACDA will deny admissions or terminate assistance due to the revocation of consent. The LACDA will afford the Head of Household (HOH) the opportunity to remove the family member who revokes the consent. If the family member revoking the consent is the HOH, the entire family will be denied admission or terminated.

13. Determination of Income Using Other Means-Tested Public Assistance (i.e., "Safe Harbor") 24 CFR §§ 5.609(c)(3)

In accordance with HOTMA, the LACDA may determine a family's annual income, including income from assets, prior to the application of any deductions based on income determinations made within the previous 12-month period, using income determinations from the following types of means-tested federal public assistance programs:

- The Temporary Assistance for Needy Families block grant (42 U.S.C. 601, et seq.).
- Medicaid (42 U.S.C. 1396 et seq.).
- The Supplemental Nutrition Assistance Program (42 U.S.C. 2011 et seq.).
- The Earned Income Tax Credit (26 U.S.C. 32).
- The Low-Income Housing Tax Credit (26 U.S.C. 42).
- The Special Supplemental Nutrition Program for Women, Infants, and Children (42 U.S.C. 1786).
- Supplemental Security Income (42 U.S.C. 1381 et seq.).
- Other programs administered by the Secretary.
- Other means-tested forms of federal public assistance for which HUD has established a memorandum of understanding.
- Other federal benefit determinations made by other means-tested federal programs that the Secretary determines to have comparable reliability and announces through a Federal Register notice.

As a discretionary policy, the LACDA will accept and use determinations of income from the federal means-tested forms of assistance listed above when all

documentation requirements below are satisfied. The LACDA will accept and use determinations of income from the federal means-tested forms of assistance listed above during new admission/move-ins, interim re-examination, and annual re-examinations. In situations where the family presents multiple verifications from the same or different acceptable Safe Harbor programs, the LACDA will accept the most recent, detailed, and comprehensive income determination provided.

Third-Party Verification – Required Information

When the LACDA elects to use the annual income determination from one of the above-listed forms of means-tested federal public assistance, the LACDA must obtain the income information by means of a third-party verification. The third-party verification must state the following:

1. **The family size.** The verification must be for the entire family, i.e., the family members listed in the documentation must match the family's composition in the assisted unit, except for household members), and
2. **The amount of the family's annual income.** The annual income need not be broken down by family member or income type. Annual income includes income earned from assets, therefore when using Safe Harbor to verify a family's income, the LACDA will neither further inquire about a family's net family assets, nor about the income earned from those assets, except with respect to whether or not the family owns assets that exceed the asset limitation in 24 CFR § 5.618.

Third-Party Verification – Verification Format

The Safe Harbor verification may be in the form of an award letter from the relevant federal program and must show that the family's income determination was made in the previous 12 months. Verification will be considered acceptable if the documentation meets the criteria that the income determination was made within the 12 months prior to the receipt of the verification by the LACDA. This satisfies all verification date requirements for Safe Harbor income determinations.

The Safe Harbor documentation will be considered acceptable if any of the following dates fall into the 12-month period prior to the receipt of the documentation by the LACDA:

- Income determination effective date;
- Program administrator's signature date;
- Family's signature date;
- Report effective date; or
- Other report-specific dates that verify the income determination date.

The only information that the LACDA is permitted to use to determine income under this Safe Harbor is the total income determination made by the federal means-test program administrator. Other federal programs may provide additional

information about income inclusions and exclusions in their award letters; however, these determinations and any other information **must not** be considered by the LACDA for purposes of the HOTMA Safe Harbor provision. The LACDA is not permitted to mix and match Safe Harbor income determinations and other income verifications.

The amounts of unreimbursed reasonable attendant care expenses and childcare expenses deducted from a family's annual income, except for when a family is approved for a childcare expense hardship exemption, must still be capped by the amount earned by any family member who is enabled to work as a result of the expense. The LACDA will therefore be required to obtain third-party verification of the applicable employment income and cap the respective expense deductions accordingly.

It is anticipated that in many cases families will provide the LACDA with the Safe Harbor third-party verification for the purpose of re-examination, rather than the LACDA mailing a verification form to the third party to complete.

When the LACDA does not accept Safe Harbor documentation, is unable to obtain Safe Harbor documentation, or if the family disputes the other program's income determination, the LACDA must calculate the family's annual income using the methods established in § 5.609(c)(1) and (2).

If the LACDA uses a Safe Harbor determination to determine the family's income for an income examination (New Admission/Move Ins, Interim Re-examination, or Annual Re-examination), then the family is obligated to report changes in income that meet the reporting requirement and occur after the effective date of the LACDA's transaction. This might mean that a certain source of income was not considered in the family's income, because the other program does not consider the source to be income.

For example, if the family begins receiving a new source of income on 2/1/2024 and the LACDA completed an annual re-examination effective 3/1/2024 using a Safe Harbor income determination, then the family does not need to report that change in income. If the family has a change in adjusted income in accordance with HUD's rules that occurs after 3/1/2024, when the annual re-examination was effective, then the family must report the change to the LACDA.

14. Enterprise Income Verification (EIV) Usage

In accordance with HUD, the LACDA uses HUD's EIV system in its entirety, in accordance with 24 CFR § 5.233 to reduce the administrative and subsidy payment errors in accordance with HUD guidance.

As a discretionary policy, the LACDA will continue to use the EIV system in its entirety during interim re-examinations.

15. Earned Income Disregard (EID)

Currently, EID is applicable to an eligible adult family member, 18 years of age or older, who either begins earning income or experiences an increase in earned income. The earned income disregard allows the LACDA to exclude the increased (or new) earned income, resulting in an income exclusion, and not counted towards the tenant's rent portion for a period of no more than 24 months.

Effective January 1, 2024, the LACDA will no longer provide the benefit of the EID disallowance. Existing participating families receiving the EID disallowance will continue uninterrupted through the EID benefit of the initial or remaining 24-month period of the exclusion.

Families eligible to receive the Jobs Plus Earned Income Disregard (JPEID) may continue to receive JPEID benefits and will not be impacted by the HOTMA final rule, until HUD states otherwise.

16. Mandatory Deductions

As required by HUD, the LACDA will comply with the mandatory changes in the allowable deduction amounts. For example:

- Elderly/disabled allowance will be updated from \$400 to \$525.
- Allowance of \$480 per dependent will be updated in accordance with HUD's public notice.

These amounts are subject to an annual inflationary adjustment in accordance with the CPI and will be published yearly by HUD. The annual inflationary adjustment will be rounded by HUD to the next lowest multiple of \$25.

17. Income Exclusions

Currently, HUD provides PHAs with a list of mandatory income inclusions and exclusions which are outlined in both program's plans.

In accordance with HUD, the definition of annual income has been modified to require that PHAs include all sources of a family's income unless specifically excluded. As such, HUD has provided a list of income exclusions that is now included in both program's plans.

18. National Standards for the Physical Inspection of Real Estate

HUD's new housing inspection approach, under development, prioritizes health, safety, and functional deficiencies over those about appearance. The National Standards for the Physical Inspection of Real Estate (NSPIRE) is a single inspection standard for all units under the Public Housing, HCV, Multifamily, and Community Planning and Development (CPD) programs.

In accordance with HUD, the LACDA's Public Housing program is required to comply with the mandatory NSPIRE. This new standard replaces the Real Estate Assessment Center's (REAC's) mandated inspections. It should be noted that the LACDA voluntarily participated in HUD's NSPIRE demonstration for all Public Housing developments.

In accordance with HUD, the LACDA's Section 8 tenant-based program is required to comply and replace its Housing Quality Standards (HQS) with the NSPIRE inspection model. As such, the LACDA's Section 8 tenant-based program will be working towards transitioning to HUD's new NSPIRE inspection standards by no later than October 1, 2024.

The LACDA does not have authority to establish discretionary policy or modify HUD's NSPIRE inspection standards.

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

Section 24 of the Code of Federal Regulations, Part §903.17, requires a public hearing to approve the Annual Plan. Copies of the Annual Plan were made available for review and comment during a public review and comment period from December 22, 2023 to February 5, 2024, at twelve housing developments, LACDA administrative offices, and the LACDA website. Notices of the availability of the documents and the Board meeting date were also published in newspapers of general circulation during the public comment period. On March 20, 2024, the Housing Advisory Committee recommended approval of the Annual Plan.

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

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

ENVIRONMENTAL DOCUMENTATION

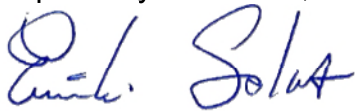
Approval of the Annual Plan is exempt from the provisions of the National Environmental Policy Act (NEPA) pursuant to 24 Code of Federal Regulations, Part 58, Section 58.34 (a)(1), because it involves planning activities that will not have a physical impact on or result in any physical changes to the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

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

IMPACT ON CURRENT PROGRAMS

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

Respectfully submitted,

A handwritten signature in blue ink that reads "Emilio Salas". The signature is written in a cursive style with a large initial "E" and "S".

EMILIO SALAS
Executive Director

Enclosures

Attachment A

Summary of Public Outreach

Section 511 of the QHWRA instructs every Public Housing Annual to convene one or more Resident Advisory Boards (RABs) to assist and make recommendations on the development of the Annual Plan, as well as on any significant amendments or modifications. Public Housing Program residents and Section 8 HCV Program participants were invited to participate in the RAB to learn about programs included in the Annual Plan and to provide input.

Summary of RAB Activities

Public Housing Program

The LACDA's regular annual RAB meetings were held virtually and in community rooms at our properties. This new format is to accommodate residents who do not have a means of transportation. This also assisted in providing peace of mind for residents due to the ongoing health concerns surrounding various diseases.

In addition to limited in-person meetings, individual telephone calls and an email blast with details and instructions were made to inform RAB members of the RAB meeting.

Section 8 Program

To accommodate the LACDA's RAB members, the LACDA held two RAB meetings via a ZOOM conference call. An email with details and instructions was sent out to RAB members and calls were made in advance to ensure RAB members would be able to attend the RAB meeting remotely.

Other Outreach Activities

- Overall, the RAB was content with the Annual Plan's progress of meeting the agency's five-year goals. Given the uncertainty of the mandated HUD policy changes to the programs, there were no comments from the RAB. This has been noted under Section C.1 of the Annual Plan (Form HUD-50075-HP).
- As needed, translators are made available during the Public Housing and Section 8 RAB meetings.
- In December 2023, a public notice was posted to all Public Housing residents notifying them of the Public Review and Comment Period.
- In December 2023, an email to stakeholders and participating cities was sent announcing the commencement of the Public Review period and inviting them to comment.
- In December 2023, a public notice announcing the Public Review and Comment Period was published in the Los Angeles Times, La Opinion, the Daily News, Los Angeles Sentinel, the Daily Breeze, and the Long Beach Press Telegram.

- During the Public Review and Comment Period, the Annual Plan was made available at 11 housing developments, the LACDA Administrative Office in Alhambra, the Section 8 Palmdale office, and the LACDA website.
- Summaries of the Annual Plan were available during the Public Review and Comment Period in Russian and Spanish at the above locations and on the LACDA's website.

Attachment B

<u>Housing Development</u>	<u>Address</u>	<u>District</u>
1. Nueva Maravilla	4919 E. Cesar Chavez Los Angeles, CA 90022	1
2. Francisquito Villa	14622 Francisquito Ave La Puente, CA 91746	1
3. South Scattered Sites Management office	12721 Central Avenue Los Angeles, CA 90059	2
4. South Bay Gardens	230 E 130 th St Los Angeles, CA 90061	2
5. Century & Wilton	10025 Wilton Pl Los Angeles, CA 90047	2
6. Marina Manor	3405 Via Dolce Marina Del Rey, CA 90292	2
7. Kings Road Apartments	800 N Kings Road West Hollywood, CA 90069	3
8. Ocean Park	175 Ocean Park Blvd Santa Monica, CA 90405	3
9. Carmelitos Family	700 Via Wanda Long Beach, CA 90805	4
10. Harbor Hills	26607 S. Western Avenue Lomita, CA 90717	4
11. Orchard Arms	23520 Wiley Canyon Rd Valencia, CA 91355	5
12. Foothill Villa	2423 Foothill Blvd La Crescenta, CA 91214	5

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

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

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the __ 5-Year and/or X Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 2024-2025, in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
 11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
 12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
 13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
 16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Los Angeles County Development Authority

CA002

PHA Name
Code

PHA Number/HA

X Annual PHA Plan for Fiscal Year 2024-2025

5-Year PHA Plan for Fiscal Years

<p>Approved As To Form Dawyn R. Harrison County Counsel</p> <p><i>DP</i> by Senior Deputy County Counsel</p>
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I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Executive Director

Name Board Chairman

EMILIO SALAS

LINDSEY HORVATH

Signature



02/28/2024
Date

Signature

Date

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

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