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Resolution to Amend the Administrative Plan Regarding Chapter 17 Project-Based Vouchers
The Ann Arbor Housing Commission's Housing Choice Voucher Administrative Plan details its policies and procedures for the management of its Housing Choice Voucher (HCV) Program. The AAHC periodically revises the Plan to reflect changes in HUD regulations and changes in AAHC policies.

Staff recommend adding language to the Administrative Plan Chapter 17 to ensure compliance with HUD PIH Notice 2017-21 Implementation Guidance: Housing Opportunity Through Modernization Act of 2016 (HOTMA) - Housing Choice Voucher (HCV) and Project-Based Voucher (PBV) Provisions . The AAHC issued a Request for Proposal for Project-Based Vouchers in February 2023. Staff reviewed all the HUD notices related to Project-Based Vouchers to ensure that the Administrative Plan was in compliance and found that a couple Administrative Plan sections needed updating.

Recommendation #1 related to tenant services. “If a PHA plans to exceed the cap on the number of units in a project that may have PBV attached for non-elderly families (i.e., the greater of 25 dwelling units or 25 percent of the dwelling units in any project), the Administrative Plan must describe the types of services offered to families for a project to qualify for the exception and to the extent to which such services will be provided.” The Administrative Plan currently allows this but it needs to also list the types of services that may be offered to qualify.

[Current PHA Policy](#)

17-II.F. CAP ON NUMBER OF PBV UNITS IN EACH PROJECT

Supportive Services

PHAs must include in the PHA administrative plan the type of services offered to families for a project to qualify for the exception and the extent to which such services will be provided. As of April 18, 2017, the project must make supportive services available to all families receiving PBV assistance in the project, but the

family does not actually have to accept and receive supportive services for the exception to apply to the unit, although the family must be eligible to receive the supportive services. It is not necessary that the services be provided at or by the project, but must be reasonably available to families receiving PBV assistance at the project and designed to help families in the project achieve self-sufficiency or live in the community as independently as possible. A PHA may not require participation in the supportive service as a condition of living in the excepted unit, although such services may be offered.

PHA Policy

The PHA will allow all excepted unit types.

Proposed PHA Policy

PHA Policy

The PHA will allow all excepted unit types. Supportive services can include but are not limited to:

- Family Self Sufficiency Program
- Payee Services
- Financial Literacy/Credit Counseling
- Employment/Job Skills
- Anger Management/Conflict Resolution
- Mental Health Support
- Medical Care
- Substance Abuse Recovery Support
- Domestic Violence
- Parenting and Child Welfare
- Education and Employment Support
- Coordination of Entitlements
- Money Management and Financial Literacy
- Assistance with Basic Needs
- Legal Services
- Child Care
- Transportation
- Security
- Household Maintenance and Activities of Daily Living
- Connections to Mainstream Services and Community Resources
- Tenancy Problems and Lease Violations
- Guest Monitoring and Support
- Eviction Prevention

Recommendation #2 related to the definition of a project. The current Administrative plan definition is slightly different than HUD's definition. PIH Notice 2017-21 states that: "The PBV statute defines project as a single building, multiple contiguous buildings, or multiple buildings on contiguous parcels of land. This definition was unchanged by HOTMA. PHAs have discretion to define a project within the parameters of the statutory definition. That is, a PHA may define a project as a single building, or as multiple contiguous buildings, or as multiple buildings on contiguous parcels of land."

Current PHA Policy

17-V.A. HOUSING ASSISTANCE PAYMENTS CONTRACT (HAP) OVERVIEW

PHA Policy

The definition of a project is a single building or multiple contiguous buildings or multiple buildings on a contiguous site or single-family scattered sites that are not contiguous.

Proposed PHA Policy

PHA Policy

The definition of a project is a single building or multiple contiguous buildings or multiple buildings on a contiguous site.

Recommendation #3 related to the definition of a suitable location to include areas that have a high-student population. One of HUD's definition of a suitable area is one with a poverty level of less than 20%, with some exceptions as described below. Ann Arbor, like other communities with a large population of students in higher education, appear to have high poverty census tracts that are not actually high-poverty. All of areas with high poverty census tracts in Ann Arbor are census tracts with high student populations, who self-report their income and are considered temporarily in poverty, and who live in high-cost housing.

Current PHA Policy

17-II.G. SITE SELECTION STANDARDS

Compliance with PBV Goals, Civil Rights Requirements, and HQS Site Standards
[24 CFR 983.57(b)]

PHA Policy

It is the PHA goal to select sites for PBV housing that provide for deconcentrating poverty and expanding housing and economic opportunities. In complying with this goal the PHA will limit approval of sites for PBV housing in census tracts that have poverty concentrations of 20 percent or less.

However, the PHA will grant exceptions to the 20 percent standard where the PHA determines that the PBV assistance will complement other local redevelopment activities designed to deconcentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations greater than 20 percent, such as sites in:

A census tract in which the proposed PBV development will be located in a HUD-designated Enterprise Zone, Economic Community, or Renewal Community;

A census tract where the concentration of assisted units will be or has decreased as a result of public housing demolition and HOPE VI redevelopment;

A census tract in which the proposed PBV development will be located is undergoing significant revitalization as a result of state, local, or federal dollars invested in the area;

A census tract where new market rate units are being developed where such market rate units will positively impact the poverty rate in the area;

A census tract where there has been an overall decline in the poverty rate within the past five years; or

A census tract where there are meaningful opportunities for educational and economic advancement.

A project that is providing permanent supportive housing which provides a wide spectrum of supportive services including at least 5 of the services listed above under supportive services.

Proposed PHA Policy

The addition of the following to the list:

The project is located in a census tract where more than 50% of residents are post-secondary students (college students).

Staff recommend that the AAHC Board approve the 3 recommendations above to ensure compliance with HUD regulations related to Project-Based Vouchers.

Prepared by: Jennifer Hall, Executive Director

Reviewed and Approved by: Jennifer Hall, Executive Director

WHEREAS, the Ann Arbor Housing Commission's Housing Choice Voucher Administrative Plan details its policies and procedures for the management of its Housing Choice Voucher (HCV) Program; and

WHEREAS, staff recommend adding language to the administrative plan to ensure compliance with HUD's Project-Based Voucher program rules related to defining tenant services for exception to the project cap, definition of a project and definition of a low-poverty census tract; and

RESOLVED, that the Board of the Ann Arbor Housing Commission approve the amended language related as described in the memorandum above, to the Administrative Plan to take effect as of February 22, 2023.