

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

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# **Biloxi Housing Authority**

## **PHA Plan**

**Annual Plan for Fiscal Year 2020**

NOTE: THIS PHA PLANS TEMPLATE (HUD 50075) IS TO BE COMPLETED IN ACCORDANCE WITH  
INSTRUCTIONS LOCATED IN APPLICABLE PIH NOTICES

**Streamlined Annual  
PHA Plan  
(HCV Only 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-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

**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 and 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><b>PHA Name:</b> The Housing Authority of the City of Biloxi <b>PHA Code:</b> MS005  <b>PHA Plan for Fiscal Year Beginning:</b> 01/2020  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  <b>Number of Housing Choice Vouchers (HCVs)</b> 1627  <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> 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 of 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 the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website.</p> <p style="text-align: center;"><b>Attachment "A"</b></p> <p><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a joint Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Participating PHAs</th> <th style="width: 10%;">PHA Code</th> <th style="width: 25%;">Program(s) in the Consortia</th> <th style="width: 25%;">Program(s) not in the Consortia</th> <th style="width: 15%;">No. of Units in Each Program</th> </tr> </thead> <tbody> <tr> <td>Lead HA:</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></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	Lead HA:																								
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<b>B.</b>	<b>Annual Plan.</b>				
<b>B.1</b>	<p><b>Revision of PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Informal Review and Hearing Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification.</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element(s):</p> <p>* <b>Financial Resources – Attachment “B”</b></p> <p>* <b>Operations and Management – Attachment “C”</b></p> <p>* <b>Informal Review and Hearing Procedures – Attachment “D”</b></p> <p>* <b>Self-Sufficiency Programs – Attachment “E”</b></p> <p>* <b>Significant Amendment/Modification – Attachment “F” Section 8 Administrative Plan (Effective July 10, 2019)</b></p>				
<b>B.2</b>	<p><b>New Activities</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Project Based Vouchers.</p> <p>(b) If this activity is planned for the current Fiscal Year, describe the activities. Provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.</p>				
<b>B.3</b>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N N/A</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>				
<b>B.4</b>	<p><b>Civil Rights Certification</b></p> <p><a href="#">Form HUD-50077</a>, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. <b>Attachment “G”</b></p>				
<b>B.5</b>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <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. <b>Attachment “H”</b></p>				
<b>B.6</b>	<p><b>Progress Report.</b></p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in its 5-Year PHA Plan. <b>Attachment “I”</b></p>				

<b>B.7</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></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>(a) 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 style="text-align: center;"><b>Attachment "J"</b></p>
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## Instructions for Preparation of Form HUD-50075-HCV Annual PHA Plan for HCV Only PHAs

**A. PHA Information.** All PHAs must complete this section. ([24 CFR §903.23\(4\)\(e\)](#))

**A.1** Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **Number of 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.

**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. ([24 CFR §903.11\(c\)\(3\)](#))

**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."

**Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income families who reside in the PHA's jurisdiction and other families who are on the Section 8 tenant-based waiting list. 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\(a\)\(1\)](#) and [24 CFR §903.7\(a\)\(2\)\(i\)](#)). 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\(a\)\(2\)\(ii\)](#))

**Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.** A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for HCV. ([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 HCV funding and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support 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 rental contributions of families receiving tenant-based assistance, discretionary minimum tenant rents, and payment standard policies. ([24 CFR §903.7\(d\)](#))

**Operation and Management.** A statement that includes a description of PHA management organization, and a listing of the programs administered by the PHA. ([24 CFR §903.7\(e\)\(3\)\(4\)](#)).

**Informal Review and Hearing Procedures.** A description of the informal hearing and review procedures that the PHA makes available to its applicants. ([24 CFR §903.7\(f\)](#))

**Homeownership Programs.** A statement describing any homeownership programs (including project number and unit count) administered by the agency under section 8y of the 1937 Act, or for which the PHA has applied or will apply for approval. ([24 CFR §903.7\(k\)](#))

**Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.** A description of any PHA programs relating to services and amenities coordinated, promoted, or provided by the PHA for assisted families, including those resulting from the PHA's partnership with other entities, for the enhancement of the economic and social self-sufficiency of assisted families, including programs provided or offered as a result of the PHA's partnerships with other entities, and activities under section 3 of the Housing and Community Development Act of 1968 and under requirements for the Family Self-Sufficiency Program and others. Include the program's size (including required and actual size of the FSS program) and means of allocating assistance to households. ([24 CFR §903.7\(l\)\(i\)](#)) Describe how the PHA will comply with the requirements of section 12(c) and (d) of the 1937 Act that relate to treatment of income changes resulting from welfare program requirements. ([24 CFR §903.7\(l\)\(iii\)](#)).

**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; or b) any change with regard to homeownership programs. See guidance on HUD’s website at: [Notice PIH 1999-51](#). ([24 CFR §903.7\(r\)\(2\)\(ii\)](#))

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

**B.2 New Activity.** If the PHA intends to undertake new activity using Housing Choice Vouchers (HCVs) for new Project-Based Vouchers (PBVs) in the current Fiscal Year, mark “yes” for this element, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake this activity, mark “no.” ([24 CFR §983.57\(b\)\(1\)](#) and Section 8(13)(C) of the United States Housing Act of 1937.

**Project-Based Vouchers (PBV).** Describe any plans to use HCVs for new project-based vouchers. If using PBVs, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.

**B.3 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 §903.11\(c\)\(3\)](#), [24 CFR §903.7\(p\)](#))

**B.4 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.5 Certification by State or Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, including the manner in which the applicable plan contents are consistent with the Consolidated Plans, must be submitted by the PHA as an electronic attachment to the PHA Plan. ([24 CFR §903.15](#))

**B.6 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 §903.11\(c\)\(3\)](#), [24 CFR §903.7\(r\)\(1\)](#))

**B.7 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](#))

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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 Annual PHA Plan. The Annual PHA Plan provides 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 for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 4.5 hour 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

## Attachment "A"

### A.1 PHA Information

The Housing Authority of the City of Biloxi proposed, and prior Five Year and Annual Plans are available for review at the following locations.

- The Housing Authority of the City of Biloxi, Main Office  
330 Benachi Avenue, Biloxi, MS 39530
- Section 8 Assisted Housing/Intake Office  
154 Porter Avenue, Biloxi, MS 39530
- Oakwood Village  
330 Benachi Avenue, Biloxi, MS 39530
- Bayview Place  
449 Dr. Gilbert Mason Drive, Biloxi, MS 39530
- Cadet Point  
200 Maple Street, Biloxi, MS 39530
- Seashore Oaks  
1450- A Beach Blvd, Biloxi, MS 39530
- Suncoast Villa  
225 Elmira Drive, Biloxi, MS 39531
- McDonnell Avenue Apartments  
242 McDonnell Avenue, Biloxi, MS 39531
- Beauvoir Pass  
312 Agincourt Avenue, Biloxi, MS 39531
- Gulfshore Villas  
2301 Atkinson Road, Biloxi, MS 39531
- Covenant Square Apartments  
270 Covenant Square Drive, Biloxi, MS 39531
- Fernwood Place  
2775 Fernwood Road, Biloxi, MS 39531
- Biloxi Housing Authority Official Website  
[www.biloxihousing.org](http://www.biloxihousing.org)

**Attachment “B”**

**B. Annual Plan**

**B.1. Revision of PHA Plan Elements  
(b) Financial Resources**

**Housing Choice Voucher Program  
Statement of Financial Resources – Plan Year 2019**

**Sources:**

Annual Contribution for Housing Choice Voucher

1. Housing Assistance Payment Subsidy

Tenant Based Vouchers and Rental Assistance Demonstration Vouchers \$ 9,500,000

2. Administrative Fees \$ 980,000

3. Fraud Recovery Funds

a. Housing Payment Assistance \$ 12,000

b. Administrative Income \$ 12,000

**TOTAL Resources - \$ 10,504,000**

## Attachment “C”

### B. Annual Plan

#### B.1. Revision of PHA Plan Elements

##### (b) Operations and Management

The Housing Authority of the City of Biloxi converted its Public Housing Portfolio to the Rental Assistance Demonstration Program (RAD) under the Housing Choice Voucher Project Based Program in October of 2015. As a result of this conversion, these communities are no longer monitored under the Public Housing Assessment System (PHAS), as a result, the housing authority is no longer required to have an Admissions and Continued Occupancy Plan (ACOP). The housing portfolio is monitored under the Section Eight Management Assessment Program (SEMAP), utilizing the Biloxi Housing Authority Housing Choice Voucher (HCV) Section 8 Administrative Plan. The agency’s administrative plan did not address at the time of conversion to RAD/PBV, all programs administered by the housing authority under the Housing Choice Voucher Program. A new HCV Administrative Plan was drafted to include the Tenant Based Voucher (TBV) and RAD/PBV Project Based Voucher Programs, approved by the Biloxi Housing Authority Board of Commissioners on July 10, 2019.

The Housing Authority of the City of Biloxi administers affordable housing for resident of Biloxi, Mississippi through the RAD/PBV, Project Based Voucher (PBV), Tenant Based Voucher (TBV) and Veterans Affairs Supportive Housing (VASH) programs. In addition to these programs, the housing authority manages Low Income Housing Tax Credit (LIHTC) units, constructed under a HOPE VI Grant. The agency owns and manages five (5) designated sites for the Elderly and Near Elderly including an Assisted Living Facility and Adult Day Care Center managed by Pavilion Health Services. Two (2) sites, Seashore Oaks six-story (120 units) and Gulfshore Villas (100 units) are under the RAD/PBV program. The Seashore Oaks Assisted Living Facility (42 units) is a Project Based Voucher development. The senior community at Seashore Oaks has sixty-five (65) Market Rate units owned and managed by the agency. Through the HOPE VI Grant, Cadet Point was constructed and consists of 76 units designated as Elderly and are part of the agency’s LIHTC properties. The completion of Beauvoir Pass in 2014 added 75 Project Based Voucher units to the housing authority’s inventory.

The Housing Authority of the City of Biloxi moved its Housing Choice Voucher Program office to 154 Porter Avenue, Biloxi, MS 39530 in 2016 to better serve our clients with easier access for assisted housing program application processing. The current dwelling lease agreements are under review for properties owned and managed by the Housing Authority of the City of Biloxi. The Housing Management staff are engaged in the process with the goal being the creation of a more uniform and standard lease to be used for all properties and one that conforms to Mississippi State Law for property owners and managers. It’s anticipated that the new leases will be completed and effective before or by the end of fiscal year 2019.



## Attachment “D”

### B.1 Revision of PHA Plan Elements- Informal Review and Hearing Procedures

#### Chapter 13-Section 8 HCV Administrative Plan - Effective July 10, 2019

## CHAPTER 13 - Informal Reviews and Informal Hearings

BHA provides a copy of the Informal Review and Hearing procedures in the family briefing packet. When possible and allowed by regulation/law, BHA may conduct administrative reviews of informal hearing/review requests and provide alternate resolutions at its discretion before proceeding with the family’s request for a review or hearing.

### 13.1 Informal Review Policy

Links: [24 CFR 982.554](#);

An applicant may request an informal review of the BHA’s decision to deny the applicant’s participation in the Housing Choice Voucher Program. Reviews are provided for applicants who are denied assistance before the effective date of the HAP Contract. The exception is that when an applicant is denied assistance for citizen or eligible immigrant status, the applicant is entitled to an informal hearing.

An applicant may request an informal review if the applicant:

- Is denied listing on the waiting list or for a preference
- Is denied a voucher
- Is denied participation in the Program including portability

Informal reviews will not be granted to applicants who dispute:

- The unit size (number of bedrooms) stated on the voucher.
- A determination that a unit does not comply with Housing Quality Standards including space requirements.
- A determination that a proposed lease is unacceptable.
- A decision to not approve a request for an extension of the term of the voucher.
- General policy issues, class grievances, or discretionary administrative determinations.

When the BHA determines that an applicant is ineligible for the program BHA will notify the applicant of their ineligibility in writing. The notice will contain:

- Reason(s) the family is ineligible
- Procedure for requesting a review if the applicant does not agree with the decision
- Time limit for requesting a review: The applicant must submit the written request for an informal review within 10 calendar days of the date of the denial notice.
- If the request is not submitted timely, it will mean that the applicant waived his/her right to request an informal review.

Informal review requests must be made in writing within the 10 calendar days from the date of the BHA’s Denial. The informal review will be conducted by a person or panel including other than the one who

made the decision under review or a subordinate of this person. The applicant will be provided an opportunity to present written or oral objections to the decision of the BHA. The review decision will be based only on evidence presented at the review by both parties. Evidence presented after the review but prior to the final decision may be considered.

The person or panel conducting the informal review will make a decision on behalf of BHA . If the informal review decision overturns the denial, processing for admission will resume.

If the family fails to appear for their informal review, the denial of admission will stand and the family will be so notified.

## 13.2 Informal Hearing Policy

Link: [24 CFR 982.555](#)

Informal hearings may be requested for the following reasons:

- Determination of the amount of the total tenant payment or tenant rent
- Determination of hardship regarding minimum rent
- Decision to terminate assistance
- Decision to deny a family move
- Appropriate utility allowance used from schedule
- Family unit size under BHA subsidy standards
- Termination of a family's FSS Contract, withholding supportive services, or proposing forfeiture of the family's escrow account

BHA is not required to provide an informal hearing in the following cases:

- Discretionary administrative determinations by BHA, or to consider general policy issues or class grievances
- Determination that the unit does not comply with BHA's Housing Quality Standards including space requirements for family size, that the owner failed to maintain the unit in a decent, safe, and sanitary manner in accordance with the Housing Quality Standards (HQS), (including all services, maintenance, and utilities required under the lease).
- Decision to exercise any remedy against the owner under an outstanding contract, including the termination of Housing Assistance Payments to the owner
- Decision not to approve a family's request for an extension of the term of the Voucher issued to an assisted family which wants to move to another dwelling unit with continued participation
- Establishment of BHA schedule of utility allowances for families in the program
- Disapproval of unit or lease

When the BHA determines that a participant should be terminated from the program, BHA will notify the participant of their proposed termination in writing. The notice will contain:

- Reason(s) for and timing of termination,
- The date the proposed action will take place
- Procedure for requesting a hearing if the participant does not agree with the decision

Time limit for requesting a hearing: The participant must submit the written request for an informal hearing within 10 days of the date of the termination notice.

### 13.3 Conducting Informal Hearings

BHA hearings will be conducted by a single hearing officer or a panel. The BHA will appoint a person or panel who has/have been selected in the manner required under the hearing procedure.

Hearings may be attended by the following applicable persons:

- A BHA representative(s)
- Any witnesses for the BHA
- The participant
- Any witnesses for the participant
- The participant's counsel or other representative
- If the participant is bringing legal counsel to the informal hearing, the participant must notify BHA at least 24 hours in advance of the hearing.
- Any other person approved by the BHA will be as a reasonable accommodation for a person with a disability.

#### Hearing Decision

In rendering a decision, the hearing officer/panel will consider the following matters:

- BHA Notice to the Family
- BHA Evidence to Support the BHA Decision
- Participant Presented Evidence
- Validity of Grounds for Program Termination

#### Rights of the Applicant/Participant and BHA

The applicant/participant must appear in person at the review/hearing and may be represented by an attorney, or other representative, at his/her own expense. If the family is being represented by an attorney, the family must notify BHA of such 24 hours in advance of the review/hearing.

- The applicant/family and BHA have the right to present evidence, both oral and written.
- The applicant/family and BHA have the right to question any witnesses, and the right to state his/her case prior to the hearing officer's decision.
- The applicant/family has the right to arrange for an interpreter to attend the review/hearing, at his/her own expense.
- The applicant/family has the right to seek redress directly through judicial procedures of the court.
- BHA has the right to make final submissions.

The applicant/family and BHA have the right to review any documents directly relevant to the review/hearing. Review of documents will take place at the BHA office. Copying of any documents will be at the expense of the requesting party at .50 per copy. If the applicant/family or BHA does not make the document available for examination on the request of the other party, that document may not be relied on during the review/hearing.

## Review/Hearing Process

The review/hearing will follow the following guidelines:

- The review will be conducted by any person or persons designated by BHA, other than a person who made or approved the decision under review or a subordinate of this person.
  - All BHA Denial and Termination notices will advise the applicant/family of his/her right to a review/hearing and the process to request a review/hearing.
  - The applicant/family must request the informal review/hearing in writing within the required time frame (10 days after receipt of notice from the BHA).
  - BHA will schedule the hearing within a reasonable timeframe, preferably before the effective termination date. If the hearing cannot be scheduled before the effective termination date, the effective termination date may be extended, based solely on the reason for the delay and at the sole discretion of BHA.
  - The notification of hearing will contain:
    - Date and time of the hearing
    - Location where the hearing will be held
    - Family's right to bring evidence, witnesses, legal or other representation at the
    - Right to view any documents or evidence in the possession of BHA and upon which BHA based the proposed action and, at the family's expense, to obtain a copy (at \$.50 per copy) of such documents prior to the hearing. Requests for such documents or evidence must be received no later than five business days before the hearing date.
  - If a family does not appear at a scheduled review/hearing and has not rescheduled the hearing in advance, the hearing officer will assume the family is no longer interested in the program and will uphold the denial/termination.
  - The applicant/family will be given an opportunity to present written or oral objections to BHA's decision.
- BHA will notify the applicant/family of the BHA final decision after the informal review/hearing, including a brief statement of the reasons for the final decision. The notice will contain the following information:
- Applicant/family name
  - Applicant/family address
  - Date of notice
  - Date of review/hearing
  - Final decision
  - Brief statement of the reason(s) for the final decision
  - HUD regulation and/or BHA policy which is the basis for the denial/termination (if upholding the denial/termination)
  - Effective date of denial/termination (if applicable)
- A hearing decision letter will also be sent to the owner, stating whether the termination was upheld or overturned. The notice to the owner will contain the following information:
    - Family name
    - Unit address
    - Effective date of termination or

- Effective date of re-instatement
- All requests for review, supporting documentation, and a copy of the final decision will be filed in the family's file.

#### Decisions Not Binding to BHA

BHA is not bound by a review/hearing decision on the following matters:

- A matter for which BHA is not required to provide an opportunity for an informal review/hearing or otherwise in excess of the BHA of the person conducting the review/hearing.
- A decision given contrary to HUD regulations, requirements, or otherwise contrary to Federal, State or Local law.

In the event that a review/hearing decision is not binding to BHA, the Executive Director or his/her designee will send a notice to all parties attending the review/hearing that the decision is null and void. The notice will set a date and time for a new hearing.

#### Hearing Provisions for Restrictions on Assistance to Non-Citizens

Assistance to the family will not be delayed, denied or terminated on the basis of immigration status at any time prior to the receipt of the decision of the USCIS appeal.

Assistance to a family will not be terminated or denied while the BHA hearing is pending. Assistance to an applicant may be delayed pending the BHA hearing.

## Attachment "E"

### B. Annual Plan

#### B.1. Revision of PHA Plan Elements

##### (b) Family Self-Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements

#### Introduction

The Housing Authority of the City of Biloxi will continue to operate the Family Self - Sufficiency Program (FSS) for Housing Choice Voucher (HCV) residents including those in the RAD/Project Based Housing Programs as well. Our recently revised Action Plan reflects changes in policy to an already existing program. The agency will continue to administer the HCV FSS Program with 25 mandatory slots. An Amendment was granted on June 18, 2004 for the Housing Authority of the City of Biloxi to maintain a minimum size of 25 slots regardless of the number of participants completing their contract of participation and graduating from the FSS Program.

The Family Self Sufficiency Program's (FSS) objective is to enable participating families to achieve economic independence and self-sufficiency by combining both private and public resources to provide supportive services needed by the family. To bring participants into the economic mainstream through a comprehensive program, counseling, job training, education and job placement services. Another goal is to assist under-employed residents with obtaining better jobs and become free of housing subsidies through education in money management and home ownership.

#### Family Demographics

The following demographics of the Housing Choice Voucher and Project Based Housing programs are provided to give an indication of the types of households that are expected to be candidates for the FSS program. These demographics are including ethnicity, racial, average annual income, families with disabilities and the family composition.

<b>HOUSING CHOICE VOUCHER/ PROJECT BASED HOUSING PROGRAMS</b>	
<b>ETHNICITY BREAKDOWN</b>	
HISPANIC OR LATINO	03%
NON- HISPANIC OR LATINO	97%
<b>RACIAL BREAKDOWN</b>	
WHITE	37%
BLACK/AFRICAN AMERICAN	55%
AMERICAN INDIAN/ ALASKA NATIVE	0%
ASIAN	06%
NATIVE HAWAIIN/ PACIFIC ISLANDER	0%
MULTI-RACIAL	02%

<b>AVERAGE ANNUAL INCOME</b>	
\$11,668.17	
<b>FAMILIES WITH DISABILITIES</b>	
FAMILIES WITH DISABILITIES	11%
FAMILIES WITHOUT DISABILITIES	89%
<b>FAMILY COMPOSTION BREAKDOWN (AGE)</b>	
0-5 YEARS OF AGE	16%
06-17 YEARS OF AGE	26%
18- 50 YEARS OF AGE	33%
51-61 YEARS OF AGE	11%
61-82 YEARS OF AGE	13%
83+ YEARS OF AGE	01%

It is expected the supportive services needs of participant families will include combinations of the following:

- Job training/career counseling
- Financial literacy and budget counseling
- Parenting education/support
- Goal setting skills
- Home buying education
- Basic adult education
- Childcare
- Family counseling
- Medical care information
- Conflict resolution skills
- Small business planning
- Credit rebuilding education/counseling
- Addiction counseling
- Legal Aide
- Mentoring

**Program Coordinating Committee**

Per federal regulations guiding the FSS program, a Program Coordinating Committee (PCC) must be created and maintained to assist in “securing commitments of public and private resources for the operation of the FSS program.” The PCC is also helpful in providing the FSS Program input and guidance with the development and implementation of the program. The PCC is required to have a current BHA Project Based Housing participant who simultaneously serves on another resident board, as well as a current BHA HCV participant. The PCC is also required to have members of the Biloxi Housing Authority staff. In addition, we

have a variety of community partners who choose to participate in the PCC. This helps the FSS team and its community partners to better coordinate our community resources with the hope of continuous improvement in the services provided to our shared client base and avoiding duplication of services and activities. The PCC meets quarterly and may conduct business on an as-needed basis via email, telephone conferences and in person. The Biloxi Housing Authority and Mississippi Regional Housing VIII will share a PCC committee.

### **Program Outreach**

Outreach efforts for the FSS program may include, but are not limited to: mass mailing of program information to all current BHA residents, informational flyer with application included in Annual Rexam Packets, program information available on the BHA website, door to door recruiting for Project Based Housing tenants and presentations at Project Based Housing tenant meetings. Outreach materials will be available in English and any other language as requested, assuming translating services for the language requested are available. Interpreters will be utilized as needed for all aspects of the FSS Program and clients may contact staff via fax, email, telephone or in-person. Efforts will be targeted equally to minority and non-minority families to ensure that non-English and limited English-speaking families receive information and could participate in the FSS program. Upon request, the BHA FSS program provides reasonable accommodations for people with disabilities.

### **Program Eligibility**

All households who hold a current voucher are eligible to apply for the Family Self Sufficiency Programs. Upon execution of a lease, applicant families become tenants or participants and are then eligible to participate in the Family Self Sufficiency program. Families who are currently on the HCV or PBV waiting lists are not eligible to apply until they become tenants or participants. The Biloxi Housing Authority will not deny any family the opportunity to apply for or to participate in FSS based on race, color, sex, religion, creed, national or ethnic origin, age, familial status, marital status, handicap or disability, sexual orientation. In addition, selection for participation in the program will not depend upon level of education, job history, job performance or credit history of the applicant.

### **Program Application**

Applications will be available upon request from the FSS Program Coordinator. For all applications, a HUD form 9886 will be used to release any information needed on any applicant. A standard application will be given for both HCV Tenant Based (TBV) and Project Based Voucher (PBV) applicants. The application will include name; address; contact phone numbers; program of participation (HCV or PBV); and dated signature of head of household. The Biloxi Housing Authority has incorporated a supportive service needs survey and checklist into the application process. This checklist will be used to identify needed services. Once needed services are identified by the applicant, the FSS Coordinator will contact the representatives of the available service providers and setup any needed coordination between the participant and the service provider's representative. After consulting with the family and determination that supportive services are unavailable, the PHA will skip that family and offer the FSS slot to the next family for which supportive services are available. If the BHA finds this to be a consistent problem, it will locate other resources to deliver any missing services. If the services are not determined by the FSS Program Coordinator to be key to the family's needs, the PHA will not address that need. A letter will be mailed to program participants to notify them when they have been accepted into the program.



## **Waiting List**

Applicants will be placed on a waiting list by date and time of receipt of application, and available slots will be filled from the top of the waiting list. The waiting list will be maintained by the FSS Program Coordinator and will be kept both electronically and in a paper file.

## **FSS Family Selection Procedure**

The FSS Program will only select participants who are the Head of Household holding leases for the Biloxi Housing Authority PBV & HCV Programs. When there is an available slot in the FSS program, it will be offered to the family at the top of the FSS waiting list for that program. Contact will be made with the applicant family both by phone and by mail to offer the FSS slot to the family. If the applicant family does not respond within 10 days, a second and final attempt will be made by phone and mail to contact the family. If applicant family fails to respond, the family's application will be withdrawn, and a withdrawal letter will be sent to the family alerting them that their name has been withdrawn and they may re-apply at a later date. The FSS Program staff have the primary responsibility to ensure that participants are not discriminated against in the selection process. It is the policy of the Biloxi Housing Authority to comply with all Federal, state, and local nondiscrimination laws, the Americans with Disabilities Act and the U.S. Department of Housing and Urban Development regulations governing Fair Housing and Equal Opportunity. No person shall be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under the FSS program on the ground of race, color, sex, religion, national or ethnic origin, familial status, source of income, or disability. In addition, BHA's FSS staff will, upon request, provide reasonable accommodation to persons with disabilities to ensure they can take advantage of the services provided by the FSS program.

## **Incentives to Encourage Participation**

As part of the FSS program, BHA offers incentives to encourage participation and enhance the participant's ability to achieve self-sufficiency. Some of these incentives are described below.

BHA will establish an FSS Escrow Account for each eligible participating family in accordance with HUD guidelines as a financial incentive for program participation. Please see the Escrow Account section for more detailed information on this program incentive. Participation in the BHA FSS Program will count as a Supportive Service Program required for RAD Section 8 Project Based Housing participants. Additional incentives include, but are not limited to: access to a variety of referrals for education, job training and employment support, access to free financial management classes and comprehensive credit counseling, access to free credit reports and scores from the Experian Credit Bureau throughout enrollment in the program, and access to free GED preparation services through community partners. If participants are interested in pursuing Homeownership, FSS clients have a wide network of services available that assist with everything from homebuyer education to down payment assistance programs. FSS participants also have a number of personal incentives for involvement including structured goal planning, greater opportunity to increase their standard of living, an enhanced support system, etc. Please note that many of these incentives are contingent on available funding to various service providers and are therefore subject to change.

## **Escrow Account/Interim Disbursements (Withdrawals)**

An FSS Escrow deposit is calculated based on an increase in earned income from the beginning of the clients FSS Contract of Participation; HUD form 52650 (FSS COP). The household's "family rent" is calculated in the COP. In general, an increase in the family's earned income after enrolling in the FSS program that leads to an increase in the household's "family rent" (as compared to the original figure in the COP) generates the beginning of escrow earnings. Escrow credit calculations are made when the BHA conducts an interim or

annual re-examination during the Contract of Participation. The FSS Program Coordinator will notify a participant if she/he begins to earn escrow in the program. BHA will credit escrow accounts monthly; these credits will be effective on the first day of the month during which they are credited. BHA will calculate and credit interest annually. Annually, BHA will provide all current FSS participants with an escrow statement reflecting the current balance, deposits, withdrawals, and interest accrued in the participant's escrow account.

### **Interim Disbursements of the escrow account:**

The Biloxi Housing Authority Family Self Sufficiency Program allows clients to receive interim disbursements two times for the duration of program, interim withdrawal from escrow may not exceed 50% of participant's current escrow balance and must be in accordance with the following guidelines:

Participants in the FSS program with a positive escrow balance will be allowed to request money from their escrow accounts prior to the completion of their Contract of Participation. Requests for interim disbursements must be related to one or more goals articulated in the participant's Individual Training Service Plan (ITSP) The participant must demonstrate they have made progress toward that goal before being approved for an interim disbursement. Acceptable progress towards the goal(s) will be determined by the FSS Program Coordinator while reviewing the participant's request for Interim Disbursement. The decision to release escrow will be made by consensus of the FSS Coordinator, BHA Executive Director and BHA Accounting Staff. The FSS Coordinator reserves the right to request documentation prior to deciding on the participant's interim disbursement request. Interim disbursement checks are cut directly to the Company/ Organization; it is each participant's responsibility to submit documentation (i.e. receipts) to their FSS Coordinator to verify the funds were spent as intended in the request for Interim Disbursement. An FSS Program participant will not be eligible to receive future interim disbursements from their escrow account if proper documentation is not received.

### **Forfeiting of the Escrow Account:**

If the FSS Contract of Participation is terminated, the balance of the participant's FSS escrow account will be forfeited in accordance with HUD guidelines. In the case of forfeiture of escrow, clients will not be responsible for "paying back" any interim disbursements of their escrow account they received while enrolled in the Biloxi Housing Authority FSS Program.

### **FSS Activities and Supportive Services**

FSS program participants have access to an extensive network of activities and supportive services to assist them in becoming more self-sufficient. Some of the activities and services are done directly by the FSS Coordinator, some through program partners, and others through referrals to community agencies. The following list of activities, services, and service providers reflect the current situation, but are subject to change as the FSS program and other agencies adapt to changing situations and funding:

- **Case Management, Advocacy, and Referrals:** A family participating in the FSS program will be in regular contact with the FSS Program Coordinator to develop and carry out the Individual Training and Services Plan. The FSS Program Coordinator will provide ongoing supervision of the participant's progress and act as an advocate to empower families toward self-sufficiency. In addition, he/she will facilitate and monitor other agency involvement and track participant progress on a regular basis.

- WIN Job Center: Provides computers, phone, fax and coping services for job search activities. They also provide resume preparation, career planning and assessment to residents, as well as access to training information and a resource center.
- Hope Credit Union: Provides financial counseling for participant to educate them on better money management techniques. They provide banking programs that will help with credit repair and credit building by educating the participant on how to improve credit their score and how to qualify for a loan.
- Bethel Free Health Clinic: Provides a Central location for participants to receive medical services. They provide quality health care services, at no charge, to participants without access to basic health care.
- Southern Mississippi Planning and Development District: Provides intensive case management services to link participants to supportive services. They provide information assistance and referral services, as well as insurance counseling and assistance to eligible participant. They also provide eligible participants with career development and training services under workforce development programs as well as providing youth with work experience, mentorship, tutoring, and certification opportunities.
- Mississippi Gulf Coast Community College Jefferson Davis Campus: Promotes adult literacy and continuing educational opportunities. Offers pre- and post – GED testing for participants who meet enrollment qualifications as well as GED preparatory training for all participant that meet qualifications.
- Mercy Housing and Human Development, Inc.: Provides Budget/Financial Counseling to determine current financial situational needs, client credit rating and financial planning. They assist Participants who may be Mortgage ready or near Mortgage ready by referring them to Homebuyer Education. They provide individual counseling as related to the purchase of a home, debt reduction, credit counseling and any other financial counseling needs as it relates to the family.
- Moore Community House: Provides early childhood and comprehensive health and family support services to low income families, as well as support for teen parents. They provide educational programs for career development by training low income women for careers the construction trades through the Women in Construction Program, as well as leadership and comprehensive family counseling assessments. They also provide referral services for all participants.
- Coastal Family Health Center: Provides comprehensive and evidenced based care beyond medicine to include social services and translators to facilitate clients care. Types of services offered are Adult Internal Medicine, Family Practice, OB/GYN, Dentistry, Optometry, Mental Health, Behavioral Health and Substance Abuse Counseling, HIV Care & Rapid Testing, Social Services and Medication Assistance, Spanish and Vietnamese Translators, Radiology & Mammography, Ultrasound, Health Care for the Homeless, Community Health Workers, and Outreach & Enrollment, as well as assistance with the Affordable Care Act.

## **Methods of Identification of Family Support Needs**

The FSS Program Coordinator will meet with each family to assess their personal barriers to self-sufficiency. This assessment will include a structured interview which addresses issues such as childcare, transportation, job history, educational background, social network system, medical issues, family issues, and housing situations. Upon identification of the family's needs, goals will be established including long term; interim; and short-term goals. A plan with specific timelines and responsibilities will be established including all of the HUD required long term goals as well as the individual family goals.

## **Contract Completion**

In order to complete the FSS Contract of Participation HUD form 52650 and receive the balance of the FSS Escrow Account, the FSS Family must meet one of the following sets of criteria:

- (1) The head of household must seek and maintain suitable employment and must verify that no one in their household has received welfare for the previous 12 months. In addition, the head of household, and any additional adult family members who created an Individual Training Service Plan (ITSP), must complete all goals listed on the ITSP within the designated timeframes. Lastly, the participant must request and be approved for their final disbursement, must verify full time employment and provide any documentation required to verify completion of goals.
- (2) The family's income is effectively at or above 30% of the fair market rent (FMR) for their qualifying unit size. The participant must apply and be approved for their Final Disbursement from their escrow account, which will be reviewed and approved by FSS Coordinator and the BHA Finance Department.

Please note that it is possible to complete the contract of participation and not be eligible for a final escrow disbursement. If a participant is above 30% FMR and a member of the household is still receiving welfare, the participant will complete their contract of participation when the income changes goes into effect, but will not be eligible to receive their final escrow because they are still receiving welfare assistance,

## **Contract Extensions**

The initial term of the Contract of Participation HUD form 52650 is five (5) years, but in rare circumstances the contract may be extended for up to two (2) additional years. Requests for an extension of the contract will be evaluated on a case by case basis to see if "good cause" exists for granting an extension. In general, "good cause" means a circumstance beyond the family's control and that directly prevents the participant from meeting the obligations of the contract. Such causes may include:

- Serious illness or injury in the immediate family.
- Involuntary loss of employment.

An extension may also be granted to allow the family to meet the interim goal of remaining off welfare (as defined above) for the final 12 months of the Contract. Extensions will not be granted for loss of employment due to the lack of performance on the part of the FSS participant.

All requests for extension must be submitted prior to expiration of the Contract of Participation by written request. Participants will be notified in writing within ten (10) business days of the BHA FSS Coordinator's decision and may request an informal hearing in writing within 10 days if they disagree with the decision.

### **Program Termination and Available Grievance Procedures:**

A participant's Contract of Participation with the BHA FSS Program may be terminated under the following circumstances:

- If the family voluntarily withdraws from the FSS Program.
- Mutual consent of both parties (BHA FSS program & the Head of Household on the Contract).
- The failure of the FSS family to meet its obligations under the Contract of Participation without good cause. In general, this will be determined on a case by case basis by the FSS Program Coordinator to determine if there is "good cause" for not meeting the contract obligations. In general, "good cause" means a circumstance beyond the family's control that directly prevents the participant from meeting the obligations of the contract.
- If the participant's housing assistance is terminated.
- If an HCV FSS participant ports their voucher to another jurisdiction and enters into an FSS Contract in their new jurisdiction.
- If the participant ports out before the 12-month residency requirement is fulfilled

The Biloxi Housing Authority FSS Program will make efforts to resolve all grievances of FSS participants in accordance with the policies outlined in the Action Plan, current HUD regulations for the Section 8 Housing Choice Voucher Tenant Based and Project Based programs and the BHA Administrative Plan.

### **Program Re- Entry**

A family who has previously terminated their FSS Contract of Participation will be eligible to reapply for program participation after one year has passed since the date of contract termination. A family who has been terminated from the program for non-participation can request approval to reapply one year after the termination of their contract. Requests to reapply must be in writing. The written request shall be submitted to the FSS Program Coordinator. Once the request is received and approved by the FSS Program Coordinator, the family shall be allowed to reapply. A family who has graduated and received their escrow balance will not be eligible to enroll in the program again. Exceptions will be made for families who have had significant changes in household members due to death of spouse or divorce. These exceptions will be considered on a case by case basis. A minor child of a graduate family, who has reached majority and established their own household is eligible to enter the program.

### **Non-Interference with Rights of Non-Participating Families:**

If a family elects to not participate in the FSS program, the family's admission into the Housing Choice Voucher Tenant Based Voucher or Project Based Voucher programs will not be affected.

## **Attachment “F”**

### **B. Annual Plan**

#### **B.1. Revision of PHA Plan Elements**

##### **(b) Significant Amendment/Modification**

The Housing Authority of the City of Biloxi converted its Public Housing units to the Rental Assistance Demonstration (RAD) program in October of 2015. The agency found it necessary to change its Housing Choice Voucher Programs Administrative Plan to include not only the Tenant Based Voucher Program but the new RAD/PBV Program regarding the agency’s policies pertaining to program administration. The new Administrative Plan was reviewed and approved by the housing authority’s Board of Commissioners on July 10, 2019 and made effective the same date to exact policies used to implement the Housing Choice Voucher Programs administered by the agency. The Housing Authority considers the new Administrative Plan a Significant Modification to its Five Year and Annual Plan because it covers admission, waiting list management and other Housing Choice Voucher Program policies used to manage our assisted housing programs. A copy of the Administrative Plan is included in Attachment “F” as a Significant Amendment to all previous agency plans submitted prior to July 10, 2019, the effective date of the plan.

**Attachment “G”**

**B. Annual Plan**

**B.4. Civil Rights Certification**

**Certifications of Compliance with  
PHA Plans 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 02/29/2016**

**PHA Certifications of Compliance with the PHA Plan and Related Regulations including  
Required Civil Rights Certifications**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ( X- 5-Year) and/or X Annual PHA Plan for the PHA fiscal year beginning 01/2020 hereinafter referred to as " the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) 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.
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 to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
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 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.
5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes 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 2010-25);
  - 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;
  - 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 part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.



9. 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.
10. 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.
11. 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.
12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. 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.
14. 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.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. 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.
17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. 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.
19. 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).

The Housing Authority of the City of Biloxi  
PHA Name


MS005  
PHA Number/HA Code

- X Annual PHA Plan for Fiscal Year 2020
- X Five Year Plan 2020-2024

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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. 372)

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Name of Authorized Official <b>Laura Johnson</b>	Title <b>Chairman of the Board of Commissioners</b>
Signature 	Date <b>10/14/2019</b>

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**Attachment “H”**

**B. Annual Plan**

**B.5. Certification by State and Local Officials**

**Certification by State or Local  
 Official of PHA Plans Consistency  
 with the Consolidated Plan or  
 State Consolidated Plan  
 (All PHAs)**

U. S Department of Housing and Urban Development

Office of Public and Indian Housing

OMB No. 2577-0226

Expires 2/29/2016

**Certification by State or Local Official of PHA Plans  
 Consistency with the Consolidated Plan or State Consolidated Plan**

I, **Andrew M. Gilich, Jr., the Mayor, City of Biloxi, MS** certify that the 5-Year PHA Plan  
*Official's Name Official's Title*

and/or Annual PHA Plan of the **Housing Authority of the City of Biloxi**  
*PHA Name*

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of


Impediments (AI) to Fair Housing Choice of the **City of Biloxi, Mississippi**  
*Local Jurisdiction Name*

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State Consolidated Plan and the AI.

The Housing Authority of the City of Biloxi works in coordination with the City of Biloxi to ensure consistency between the two entities and their work. The Housing Authority of the City of Biloxi is always invited to comment on the consolidated plan, and the two organizations coordinate with the preparation of the Analysis of Impediments (AI).

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 Authorized Official	Title
Andrew M. Gilich, Jr.	Mayor, City of Biloxi, MS
Signature	Date
	8-2-19

## Attachment “I”

### B. Annual Plan

#### B.6. Progress Report

##### A. Increase the availability of affordable housing

The Housing Authority of the City of Biloxi had a Section 8 Housing Choice Voucher Program consisting of 444 Tenant Based Vouchers. The agency applied for and received 148 VASH Vouchers in 2015, increasing the number of participants and expanding the Section 8 Housing Choice Voucher (HCV) Program. In 2017, the agency applied for 10 additional VASH Vouchers which were received, expanding the VASH Program to 158 vouchers and the HCV Program within the agency’s jurisdiction to 602 participants.

In order to improve the quality of assisted housing, The Housing Authority of the City of Biloxi has procured contractors to perform repairs and renovations to properties owned and managed by the agency. The Bayview Place units were scheduled for repairs and renovations in two phases, with the first phase contracted in 2018 and completed in July of 2019. The second phase was contracted in July of 2019 with work in progress through December 31, 2019, the target date for completion. There are additional housing units that were contracted in July of 2019 for Exterior Repairs and Painting at Oakwood Village, Covenant Square and Suncoast Villa, owned and managed by our agency.

##### B. Promote self-sufficiency and asset development of families and individuals

The Family Self-Sufficiency Program is a HUD program that encourages communities to develop local strategies to help assisted families obtain employment that will lead to economic and self-sufficiency. The FSS Program offered by our agency has been instrumental in empowering residents to become more independent through counseling in areas of education and employment. Through our partners in the community, residents may attend job fairs and other events that promote and assist them in obtaining gainful employment. The agency is partners with local businesses, schools and welfare agencies. Participating families can complete a comprehensive program that develops life-skills and provides better opportunities for higher paying jobs and employment. Some of our partners that provide these services are; Bethel Free Clinic; Coastal Family Health Center; Gulf Coast Community Action Agency; CFHC Mobile Medical Clinic; The Claudia Jones Computer and Learning Center; Mississippi Gulf Coast Community College-Jeff Davis Campus; St. Paul United Methodist Church; The Salvation Army; The American Red Cross; South Mississippi Planning and Development District; and The United Way of South Mississippi to name a few.

##### C. Ensure equal opportunity in housing for all Americans

The Housing Authority of the City of Biloxi implemented an online process for housing applications by procuring Happy Software that integrates with HAB Software, the agency’s line of business software for housing programs. The program is easily accessed on the agency webpage at [www.biloxihousing.org](http://www.biloxihousing.org) and is available in 128 languages, making it possible for anyone to apply. The agency maintains waiting lists for different programs including designated Elderly and Near Elderly site- based lists. The Section 8 Administrative Plan addresses the process of applying for assisted housing and includes selection from the lists based on Local Preferences and Date/Time of application. The housing management staff received certifications on September 18, 2018 for completing the HUD training program for Fair Housing and Equal Opportunity to ensure equal treatment of all clients without discrimination as defined in the Fair Housing Act.

#### **D. Increase customer satisfaction**

On October 1, 2016, the agency procured the services of HCI, Human Capital Initiatives, a Human Resources firm that has played an active part in the education of all housing authority staff in areas of customer service and human resource practices. In addition to training received in the area, the agency has implemented a communication system using the Call Max Program which allows us to send messages containing notices to our residents that provide vital information for them individually, by housing development or in mass using text, email and voice messaging. The housing authority webpage and multi-media Facebook page is used to communicate with our customers as well, providing them with up to date information related to programs and community events.

#### **E. Increase assisted housing choices**

The agency maximizes the number of affordable housing units available by employing effective maintenance and management policies to minimize the number of units off-line. Every effort is made to reduce the turnover time of vacant units by outsourcing vacant unit maintenance when needed through an existing contract for these services. The agency undertakes measures to ensure access to affordable housing regardless of the unit size required. The Housing Authority of the City of Biloxi participates in the Consolidated Plan development process to ensure coordination with broader community strategies. The agency will apply for additional housing choice vouchers should they become available to increase the program size therefore expanding housing opportunities to more families in its area of jurisdiction. The housing authority will continue to partner with the Veterans Administration assisting veterans on the Section 8 VASH program. The completion of Beauvoir Pass, a project-based voucher development added 75 units to the housing authority portfolio. With this additional housing added to the agency's inventory, we currently have 1140 units on our RAD/PBV and PBV programs. The housing authority will continue to seek other development opportunities to further increase the number of assisted housing units available to the residents of Biloxi, MS.

#### **F. Improve community quality of life and economic viability**

Our housing management staff will market the Section 8 Housing Choice Voucher Program to owners outside of areas of poverty and minority concentrations. Through our self-sufficiency program and partners in the community, we will continue to counsel residents in areas of education and employment to assist in reducing the poverty level within our area of jurisdiction. The agency currently has five developments designated for Elderly and Near Elderly families. One site offers Assisted Living services exclusively (Seashore Oaks) and others provide supportive services to the residents (Gulfshore Villas- Adult Day Care Center). The specific developments for the Elderly and Near Elderly have site-based waiting list, reducing the application processing time for assisted housing.

**Attachment “J”**

**B. Annual Plan**

**B.7. Resident Advisory Board (RAB) Comments**

**Biloxi Housing Authority**  
**City Wide Resident Council Meeting**  
**Wednesday, September 11, 2019**

Meeting was called to order at 2:03 pm, those in attendance are recorded as follows:

Biloxi Housing Staff Present:

Tom Noland, Administrative Services Manager  
Melinie Kilgore, Property Specialist

Biloxi Residents Present:

Gulfshore Villas: Linda Babineaux, President  
Lucinda Tynes, Secretary/Treasurer

Fernwood Place: Akeisha Thomas, President  
Sanjuana Pettaway, Vice President

Covenant Square: Bernetha Millsap, President

Type of Meeting: City Wide Resident Council Review and Comments concerning the Biloxi Housing Authority Five Year and Annual Plan for Fiscal Year 2020

Meeting Facilitator: Linda Babineaux, President

The meeting was called to order after introductions of officers and staff at 2:03 pm by Linda Babineaux, President of Gulfshore Villas, acting as facilitator for the meeting. Ms. Babineaux opened the meeting to discuss old business.

Old Business:

The meeting was opened to discuss old business and officers from all sites participated. Bernetha Millsap, President of Covenant Square took the floor to discuss the after-school snack program that had been discontinued. She stated that the kids have no place to go or anything to do when they get home from school each day. She wanted to know the reason why the program was discontinued. Tom Noland, Administrative Services Manager for the Biloxi Housing Authority (BHA), explained that due to the rules outlined for the after-school snacks program, BHA was unable to comply with the requirements they have established for participation. The rules required a certain liability and guarantees that BHA could not provide, therefore it was not possible for the agency to allow the program to be conducted at the housing sites owned and managed by BHA. Ms. Millsap asked if they could distribute snacks on their own after school if they were donated. Tom Noland stated that as long as the snacks didn't consist of any prepared food items and were items that were packaged and ready to serve by the manufacturer, there shouldn't be a problem with them holding the event at their site as a Resident Council function. The snacks would consist of crackers, chips, soft drinks and other pre-packaged items. He said he would ask the Executive Director for approval.

Mr. Noland mentioned that there were activities available for all residents at the Computer Lab located at Suncoast Villa and that it has reopened after the flood damage was fixed. Bernetha Millsap followed up with a

request for computers at her site and other sites to be made available for residents that can't afford to take their children to the Suncoast Villa Library and Computer Center that is available for all residents of properties owned and managed by BHA. Mr. Noland stated that he would present the request to the Executive Director for discussion and would follow-up with all Resident Council Presidents when he had the answer if this would be possible or not.

Sanjuana Pettaway, Vice President of Fernwood Place Resident Council stated that she has created a newsletter for residents to inform them of events and meeting schedules to encourage an increase in attendance of their meetings. The representatives from all sites attending the meeting agreed that it was a great idea and expressed an interest in starting their own newsletters for their residents.

Akeisha Thomas, President of Fernwood Place re-visited the question that was asked last year pertaining to the Resident Council functions and events. She stated that she would like to conduct after-school reading programs for the children at her site and asked if she was to hold an event, is it allowed for her to be the scheduled speaker. Tom Noland responded that it was allowed for her to hold an event and serve as speaker as long as the event didn't involve any political or religious content. Additionally, he stated that the event should contain educational or informational content that would enhance the quality of the resident's lives and promote self-sufficiency. Ms. Thomas was concerned about the kids not having enough activities to keep them out of trouble and wanted to have events for the kids. She recommended a Safety in Your Neighborhood class for them to teach them what to watch for and what to do when safety issues are recognized. Mr. Noland stated he would like to see a class held on how to keep the sites clean from trash and debris. Ms. Thomas agreed stating that was one of her pet peeves and that it was badly needed. She said that parents send their children to the dumpsters and they can't reach the top to place it in the container. She said that's why it's all over the grounds and around the dumpsters instead on inside them. Mr. Noland informed the attendees that BHA has requested the Waste Management Company to swap out the dumpsters for side loading units and remove the top loading ones. The change was confirmed and the company responsible for the dumpsters will begin swapping them out in the next few weeks. He stated that should help the situation concerning the trash and debris at the sites.

Linda Babineaux, President of Gulfshore Villas Resident Council asked about the status of her request at the last meeting to have picnic tables setup in a common area at her site. Tom Noland responded that he would check on the status and let her know if they will be approved. Linda Babineaux asked about the lighting at Gulfshores stating that the lighting was poor in some areas and needed to be corrected. Tom Noland informed her that BHA was looking at the lighting situation and considering changing the lighting to LED bulbs. He said he would bring this comment to the attention of the Maintenance Director, John Faulk and would let her know what decision had been made regarding the lighting.

New Business:

Discussion of the BHA Five-Year and Annual Plan for 2020

Tom Noland, Administrative Services Manager for the Biloxi Housing Authority stated that copies of the agency's Five-Year Plan for 2020-2024 and Annual Plan for 2020 were distributed to the attendees several weeks prior to the meeting for their review. The goals BHA has established were reviewed in detail. He stated that the submission of the plans was a requirement of the Department of Housing and Urban Development (HUD) and that BHA must include any questions, answers or comments from the City-Wide Resident Council members. He asked the attendees for their comments concerning both plans.



Akeisha Thomas, President of Fernwood Place asked for clarification of the RAD/PBV and TBV programs and how the process of receiving an HCV voucher worked. Tom Noland explained the difference between the two programs with the RAD/PBV voucher being attached to the unit and the TBV voucher allowing participants to search for housing in the private sector and that it was portable, allowing them to move to other areas than BHA's jurisdiction. Ms. Thomas complained that she had received a Choice Mobility Voucher and tried to find a suitable unit but could not. She stated her voucher expired before she could find one. She also stated that it was difficult to find a unit because the rents were too high or there was a shortage of units in our area and she did not want to move from the Biloxi area. Ms. Thomas asked if the plans or the BHA Section 8 Administrative Plan could be changed to limit the number of vouchers the housing authority issued because part of the problem of finding a unit was due to the large number of voucher holders on the street looking for units at the same time. Tom Noland explained the process to everyone on when and how voucher distribution takes place. He stated that BHA would issue enough vouchers required to meet the programs utilization requirements and the number that needs to be distributed is based on the number available as allocated to the agency. It was noted that the number of vouchers issued had to be sufficient to fill the open slots when families leave the program or when they are terminated. He pointed out that BHA shares the jurisdiction of Biloxi with another housing agency and they have voucher participants searching in our area. The other agency also has more vouchers allocated to them and our market is saturated with both agency participants searching for housing at the same time, making it more difficult to find housing. He stated that BHA was implementing marketing strategies geared towards landlords in the Biloxi area, to promote and expand housing opportunities for our residents. Mr. Noland stated that BHA was emphasizing Customer Services and that the agency has implemented a public notification program called Call Max to send out notices to BHA residents when needed. He stated each resident would have the option to opt in or out from the service when they receive an initial message from the system. He stated that the Biloxi Housing Authority webpage was available for residents and the community at large for access to information pertaining to housing and other activities of the agency. Mr. Noland stated that the most significant change to the agency plans this year was the inclusion of the new Section 8 Administrative Plan which covered all Housing Choice Voucher Programs, The RAD Project Based and Tenant Based Programs. He said because it is part of both plans, it was included in the Five-Year Plan for 2020-2024 and the Annual Plan for 2020 as a significant amendment.

Tom Noland asked for any additional comments from the attendees. There were no other comments made. Linda Babineaux stated that Mr. Noland had explained the plan very thoroughly and that she had a better understanding of the entire process.

Adjournment:

Linda Babineaux requested a motion to adjourn the meeting. Bernetha Millsap made a motion to adjourn. Akeisha Thomas seconded the motion and Linda Babineaux stated the meeting was adjourned.