

PHA Plans for the Secaucus Housing Authority Five-Year/Annual Plan for FYB 2025

Christopher Marra, Executive Director

FYB April 1, 2025

FINAL DRAFT



Presented by:

The **Nelrod** Company

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

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

A PHA Information.

A.1 PHA Name: Secaucus Housing Authority
PHA Code: NJ083
PHA Plan for Fiscal Year Beginning: (MM/YYYY): 04/2025
PHA Submission Type: 5-Year Plan Submission Revised 5-Year Plan Submission

Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

The following are the specific locations where the public may obtain copies of the 2025 5-Year PHA Plan:

- Administrative Office – 700 County Avenue, Secaucus, NJ 07094

PHA Consortia: (Check box if submitting a joint PHA Plan and complete table below)

Participating PHAs	PHA Code	Program(s) in the Consortia	Programs Not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead HA:					

B	Plan Elements. Required for <u>all</u> PHAs completing this form
B.1	<p>Mission. State the PHA’s mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA’s jurisdiction for the next five years.</p> <p>The PHA’s mission is the same as the Department of Housing & Urban Development: To ensure Americans have access to fair, affordable housing and opportunities to achieve self-sufficiency, thereby strengthening our communities and nation.</p>
B.2	<p>Goals and Objectives. Identify the PHA’s quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years.</p> <p>PHA GOAL #1: EXPAND THE SUPPLY OF ASSISTED HOUSING</p> <p>The PHA established the following objectives to strive in meeting goal #1:</p> <ul style="list-style-type: none"> ▪ <i>Apply for additional rental vouchers</i> ▪ <i>Leverage private or other public funds to create additional housing opportunities</i> <p>PHA GOAL #2: IMPROVE THE QUALITY OF ASSISTED HOUSING</p> <p>The PHA established the following objectives to strive in meeting goal #2:</p> <ul style="list-style-type: none"> ▪ <i>Increase customer satisfaction</i> ▪ <i>Concentrate on efforts to improve specific management functions (e.g., voucher unit inspections)</i> <p>PHA GOAL #3: INCREASE ASSISTED HOUSING CHOICES</p> <p>The PHA established the following objectives to strive in meeting goal #3</p> <ul style="list-style-type: none"> ▪ <i>Provide voucher mobility counseling</i> ▪ <i>Conduct outreach efforts to potential voucher landlords</i> <p>PHA GOAL #4: PROMOTE SELF-SUFFICIENCY AND ASSET DEVELOPMENT OF ASSISTED HOUSEHOLDS</p> <p>The PHA established the following objectives to strive in meeting goal #4</p> <ul style="list-style-type: none"> ▪ <i>Provide or attract supportive services to increase independence for the elderly or families with disabilities</i>

B.2	<p align="center">PHA GOAL #5: ENSURE EQUAL OPPORTUNITY AND AFFIRMATIVELY FURTHER FAIR HOUSING</p> <p>The PHA established the following objectives to strive in meeting goal #5</p> <ul style="list-style-type: none"> ▪ <i>Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability</i>
B.3	<p><u>Progress Statements.</u> Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.</p> <p><u>Goals/Objectives</u></p> <p>Provide or attract supportive services to increase independence for the elderly or families with disabilities in the Authority’s 275 PBV units.</p> <p><u>Progress Statement:</u> <i>The Authority continues to invite outside companies or organizations to hold seminars for residents that help them decide on health insurance selections, make them aware of home health aide services, and the local police departments hold one seminar each year on how to avoid telephone scams.</i></p> <p>Followed through to completion of all projects listed in our Physical Condition Assessment (PCA) completed prior to converting to RAD.</p> <p><u>Progress Statement:</u> <i>The Authority completed its final project in 2023-2024, when it Removed and Replaced the EIFS, windows, and AC sleeves at its 50-year-old property call The Elms, 777 Fifth Street. This 100-unit complex was originally slated to convert its electric heat to heat pumps. However, the project came in twice over budget. In 2022, the Authority wrote to HUD and received approval to change the project to the Removed and Replacement of EIFS, windows, and AC sleeves. The building which had many leaks is now more energy efficient and does not leak leaving residents with a better quality of life.</i></p> <p>Maximize the utilization of the available housing assistance funding to assist as many families as the Annual Renewal Funding with support.</p> <ul style="list-style-type: none"> ▪ Issue vouchers monthly until the maximum number of families that can be assisted is reached ▪ Utilize all means available to accurately verify family income to ensure households pay the appropriate share of the rent – including EIV’s new Income Validation Tool (IVT) ▪ Execute and collect on repayment agreements with families who fail to report income ▪ Review household composition and voucher size at the time of the annual recertification, and when participants request to move, to ensure that the household resides in an appropriately size unit, and that the rent for the unit under contract is reasonable ▪ Provide information to landlords about the benefits of the Housing Choice Voucher Program and encourage them to rent to more voucher holders

B.3	<p>Progress Statement: <i>During the past five years, the Authority reached it maximum potential with its HCV program. We consistently use either 100% or 99% of our 254 HCV each month. We have kept up with existing and reduced further Repayment agreements, due to better use of EIV and interviewing techniques. The Authority still needs to institute a more regularly scheduled landlord recruitment event/efforts.</i></p>
B.4	<p>Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA’s goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. <i>(See attachment nj083b01)</i></p>
<p>C. Other Document and/or Certification Requirements.</p>	
C.1	<p>Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.</p> <p>Substantial Deviation</p> <ul style="list-style-type: none"> ▪ <i>Any change to the Mission Statement</i> ▪ <i>50% deletion from or addition to the goals and objectives as a whole; and</i> ▪ <i>50% or more decrease in the quantifiable measurement of any individual goal or objective</i> <p>Significant Amendment/Modification</p> <ul style="list-style-type: none"> ▪ <i>Any increase or decrease over 50% in the funds projected in the Financial Resource Statement;</i> ▪ <i>Any change in policy or operation that is inconsistent with the applicable Consolidated Plan</i>
C.2	<p>Resident Advisory Board (RAB Comments).</p> <p>(a) Did the RAB(s) provide comments to the 5-Year PHA Plan? <i>(See attachment nj0083a01)</i></p> <p style="margin-left: 40px;"> Y N <input type="checkbox"/> <input checked="" type="checkbox"/> </p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. <i>N/A</i></p>
C.3	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>

C.4	<p>Required Submission of HUD FO Review</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, include Challenged Elements. <i>N/A</i></p>
D.	<p>Affirmatively Furthering Fair Housing (AFFH).</p>
D.1	<p>Affirmatively Furthering Fair Housing (AFFH). (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)</p> <p>Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <p><i>1. Combat Housing Discrimination and Promote Equity</i></p> <ul style="list-style-type: none"> • <i>Goal: Ensure equal treatment in housing opportunities, preventing discrimination in the renting, buying, and lending processes.</i> • <i>Strategy:</i> <ul style="list-style-type: none"> ○ <i>Educate residents, landlords, and housing providers about their rights and responsibilities under the Fair Housing Act.</i> ○ <i>Increase outreach and education on fair housing laws, including protection against discrimination based on race, color, religion, national origin, familial status, sex, and disability.</i> ○ <i>Implement and enforce a local anti-discrimination policy for all housing programs within your authority.</i> ○ <i>Collaborate with legal aid organizations and advocacy groups to assist individuals who believe they are victims of discrimination.</i> <p><i>2. Support Housing for Vulnerable Populations</i></p> <ul style="list-style-type: none"> • <i>Goal: Provide safe and stable housing for vulnerable groups, such as people with disabilities, seniors, and those experiencing homelessness.</i> • <i>Strategy:</i> <ul style="list-style-type: none"> ○ <i>Create and support accessible housing options for individuals with disabilities, ensuring that new developments comply with accessibility requirements under the Americans with Disabilities Act (ADA) and the Fair Housing Act.</i> ○ <i>Collaborate with local service providers to offer supportive housing for homeless individuals and families, including those transitioning from temporary shelters to permanent housing.</i>

D.1

- *Implement special programs that provide housing options for seniors, such as accessible units and support services tailored to their needs.*

3. Strengthen Community Engagement and Involvement

- **Goal:** *Ensure that diverse community stakeholders have a voice in fair housing planning and decision-making processes.*
- **Strategy:**
 - *Organize public meetings and focus groups to engage Secaucus residents, especially those from underrepresented communities, to gather input on housing needs and fair housing goals.*
 - *Partner with local advocacy groups, housing organizations, and community leaders to raise awareness of fair housing issues and gather feedback on current policies and programs.*
 - *Utilize surveys and data collection to better understand housing barriers, such as discrimination or lack of housing options, and incorporate community input into your local fair housing plans.*

4. Leverage HUD Funding and Resources

- **Goal:** *Maximize the use of available HUD funding and resources to support fair housing efforts in Secaucus.*
- **Strategy:**
 - *Apply for HUD grants and funding opportunities (e.g., Community Development Block Grants (CDBG), HOME Investment Partnerships Program, Housing Choice Voucher Program) to support fair housing initiatives and affordable housing projects.*
 - *Leverage federal, state, and local funds to support programs such as housing vouchers, homeownership assistance, and housing counseling services*

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 03/31/2024
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, including changes to these policies, 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 higher performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management 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 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 the 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** – A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** – A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent
- (6) **Qualified PHA** – A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A	PHA Information.																																
A.1	<p>PHA Name: <u>Secaucus Housing Authority</u> PHA Code: <u>NJ083</u> PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>04/2025</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning above) Number of Housing Choice Voucher (HCVs): <u>275</u> PHA Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information 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>The following are the specific locations where the public may obtain copies of the 2025 Annual PHA Plan:</p> <ul style="list-style-type: none"> ▪ Administrative Office – 700 County Avenue, Secaucus, NJ 07094 <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 20%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 20%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Programs Not in the Consortia</th> <th colspan="2" style="width: 30%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 15%;">PH</th> <th style="width: 15%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead HA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Programs Not in the Consortia	No. of Units in Each Program		PH	HCV	Lead HA:																							
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B	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</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 checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input 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 checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Informal Review and Hearing Procedures.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.</p> <p><input checked="" type="checkbox"/> <input 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>Housing Needs and Strategy for Addressing Housing Needs</p> <p><u>Statement of Housing Needs:</u></p> <p><u>Waiting List for Section 8</u></p> <p><i>Total: 259</i> <i>Elderly Families: 218-84%</i> <i>White: 90-35%</i> <i>Black/African American: 105-41%</i> <i>Asian: 27-10%</i> <i>Other 190-37-14%</i></p> <p><i>The waiting list has been closed for 36 months. The PHA does expect to reopen the waiting list in the PHA plan year.</i></p> <p><u>Waiting List for Project-Based Voucher</u></p> <p><i>Total: 405</i> <i>Elderly Families: 344-85%</i> <i>Families with Disabilities: 61-15%</i></p>

B.1

White: 228-56%
Black/African American: 30-7%
American Indian/Alaska Native: 1-0.25%
Asian: 112-28%
Native Hawaiian/Other Pacific Islander: 1-0.25%
Hispanic: 140-35%

The waiting list is not closed.

Strategies for Addressing Housing Needs

Need: Shortage of affordable housing for all eligible populations

PHA shall increase the number of affordable units available to the PHA within its current resources by:

- *Apply for additional Section 8 units should they become available*
- *Pursue housing resources other than public housing or Section 8 tenant-based assistance*

Need: Specific Family Types: Families at or below 30% of median

PHA shall target available assistance to families at or below 30% of AMI by:

- *Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance*

Need: Specific Family Types: Families at or below 50% of median N/A

Need: Specific Family Types: The Elderly

PHA shall target available assistance to the elderly by:

- *Apply for special-purpose vouchers targeted to the elderly, should they become available*

Need: Specific Family Types: Families with Disabilities

PHA shall target available assistance to Families with Disabilities by:

- *Apply for special-purpose vouchers targeted to families with disabilities, should they become available*

B.1 Need: Specific Family Types: Races or ethnicities with disproportionate housing Needs

PHA will increase awareness of PHA resources among families of races and ethnicities with disproportionate needs by:

- *Affirmatively market to races/ethnicities shown to have disproportionate housing needs*
- *Update analysis of impediments to determine need of families with disabilities and identify what interferes with their needs*

Reason for Selecting Strategies:

- *Funding constraints*
- *Staffing constraints*
- *Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA*
- *Community priorities regarding housing assistance*

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions

Eligibility

Equal Access

The term “family” includes, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

- (1) *A single person, who may be an elderly person, displaced person, disabled person, near-elderly person or any other single person; or*
- (2) *A group of persons residing together and such group includes, but is not limited to:*
 - (i) *A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);*
 - (ii) *An elderly family;*
 - (iii) *A near-elderly family;*
 - (iv) *A disabled family;*
 - (v) *A displaced family; and*
 - (vi) *The remaining member of a tenant family.*

Disabled family means a family whose head (including co-head), spouse or sole member is a person with a disability.

Elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 62 years of age.

B.1

Near elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62.

Sexual orientation means homosexuality, heterosexuality or bisexuality.

Gender identity means actual or perceived gender-related characteristics.

Waiting List Organization

The Secaucus Housing Authority's waiting list for the Section 8 tenant-based assistance is not merged with any other program waiting list.

Interested persons may apply for admission to Section 8 tenant-based assistance at:

- PHA Main Administrative Office
- *Online at website*

Search Time:

The PHA does give an additional 60-day extension on a standard 60-day period to search for a unit for a total of 120-days.

B.1

Financial Resources

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2025 grants)		
a) Public Housing Operating Fund		
b) Public Housing Capital Fund		
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	5,000,538.00	
f) Resident Opportunity and Self- Sufficiency Grants		
g) Community Development Block Grant		
h) HOME		
Other Federal Grants (list below)		
2. Prior Year Federal Grants (unobligated funds only) (list below)		
3. Public Housing Dwelling Rental Income		
4. Other income (list below)		
Rent	1,479,958.00	
5. Non-federal sources (list below)	1,148,812.00	
Total resources	\$7,629,308.00	

Rent Determination

Payment Standards:

The PHA's payment standard is:

- 100% of FMR/SAFMR

The PHA reevaluates the payment standards for adequacy annually and considers the following factors in its assessment of the adequacy:

- Success rates of assisted families
- Rent burdens of assisted families
- Funding availability

B.1**Minimum Rent:**

The PHA's minimum rent is \$50.00.

The PHA has adopted the following discretionary minimum rent hardship exemption policies.

1. Financial hardship includes the following:

- a. The family has lost eligibility or is awaiting an eligibility determination to receive federal, state, or local assistance, including a family having a non-citizen household member lawfully admitted for permanent residence and who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996;*
- b. The family income has decreased due to changed circumstances such as separation, divorce, and/or abandonment;*
- c. One or more family members have lost employment;*
- d. The family would be evicted as a result of imposing the minimum rent requirement;*
- e. There has been a death in the family; or*
- f. There are other hardship situations determined by the PHA on a case-by-case basis, i.e., alimony, child support, etc.*

2. The PHA may request documentation of the hardship and will promptly, within three (3) business days, determine if the hardship is temporary or long term.

3. The PHA will suspend the minimum rent requirement and adjust the HAP accordingly beginning the month following the family's written request for a hardship exemption until the PHA determines whether there is a qualifying financial hardship, and whether the hardship is temporary or long term.

- a. The financial hardship exemption only applies to payment of minimum rent for determining the TTP.*
- b. The TTP is still calculated excluding the minimum rent.*
- c. The family will pay the higher of 30% of the monthly adjusted income, 10% of the monthly income, or the welfare rent, as applicable, during the term of the suspended minimum rent.*

4. Temporary Hardship Exemption

The PHA has defined a temporary hardship as a hardship to last less than 90 days.

- a. If the hardship is determined to be temporary, the PHA will not impose the minimum rent during the 90-day period beginning the month following the date the family's request for a hardship exemption.*
- b. At the end of the 90-day suspension period, the minimum rent is reinstated retroactively to the date of suspension.*

B.1

c. The family must execute a Repayment Agreement for the back rent owed by the family.

5. Long Term Hardship Exemption

The PHA has defined long term hardship as a hardship that lasts more than 90 days.

a. If the hardship is determined to be long term, the PHA will exempt the family from the minimum rent requirements for as long as such hardship continues.

b. The PHA shall apply this exemption from the beginning of the month following the family's request for a hardship exemption until the end of the qualifying financial hardship.

c. The family is not required to repay the difference between the TTP and the minimum rent to the PHA once the hardship is over.

6. If the PHA is unable to determine if the hardship exemption will be temporary or long term, the PHA may approve a temporary hardship exemption and redetermine the family's status at the end of the temporary hardship exemption term.

7. No Qualifying Hardship

a. If the PHA determines there is no qualifying financial hardship, the PHA must reinstate the minimum rent, including back rent owed from the beginning of the suspension.

b. The family must execute a Repayment Agreement for the back rent owed by the family.

8. Denial of a minimum rent hardship exemption is subject to the PHA's informal hearing process.

Operation and Management

HUD Programs Under PHA Management:

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	N/A	N/A
Section 8 Vouchers	529	24-27
Section 8 Certificates	N/A	N/A
Section 8 Mod Rehab	N/A	N/A
Special Purpose Section 8 Certificates/Vouchers (list individually)	N/A	N/A
Other Federal Programs (list individually)	N/A	N/A

Homeownership

The PHA does administer a homeownership program for Section 8.

<p>B.1</p>	<p><i>The PHA will not limit the number of families participating in the HCV homeownership option.</i></p> <p><i>The PHA has established eligibility criteria for participation in its Section 8 Homeownership Option program in addition to HUD criteria.</i></p> <p><u>Significant Amendment or Modification</u></p> <p><u>Substantial Deviation</u></p> <ul style="list-style-type: none"> ▪ <i>Any change to the Mission Statement</i> ▪ <i>50% deletion from or addition to the goals and objectives as a whole; and</i> ▪ <i>50% or more decrease in the quantifiable measurement of any individual goal or objective</i> <p><u>Significant Amendment/Modification</u></p> <ul style="list-style-type: none"> ▪ <i>Any increase or decrease over 50% in the funds projected in the Financial Resource Statement;</i> ▪ <i>Any change in policy or operation that is inconsistent with the applicable Consolidated Plan</i>
<p>B.2</p>	<p>New Activities.</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>Project-Based Vouchers.</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></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. <i>N/A</i></p>
<p>B.3</p>	<p>Progress Report.</p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in its 5-Year PHA Plan.</p> <p><u>Mission</u></p> <p>The PHA’s mission is the same as the Department of Housing & Urban Development: To ensure Americans have access to fair, affordable housing and opportunities to achieve self-sufficiency, thereby strengthening our communities and nation.</p>

B.3

Goals/Objectives

Provide or attract supportive services to increase independence for the elderly or families with disabilities in the Authority’s 275 PBV units.

Progress Statement: *The Authority continues to invite outside companies or organizations to hold seminars for residents that help them decide on health insurance selections, make them aware of home health aide services, and the local police departments hold one seminar each year on how to avoid telephone scams.*

Followed through to completion of all projects listed in our Physical Condition Assessment (PCA) completed prior to converting to RAD.

Progress Statement: *The Authority completed its final project in 2023-2024, when it Removed and Replaced the EIFS, windows, and AC sleeves at its 50-year-old property call The Elms, 777 Fifth Street. This 100-unit complex was originally slated to convert its electric heat to heat pumps. However, the project came in twice over budget. In 2022, the Authority wrote to HUD and received approval to change the project to the Removed and Replacement of EIFS, windows, and AC sleeves. The building which had many leaks is now more energy efficient and does not leak leaving residents with a better quality of life.*

Maximize the utilization of the available housing assistance funding to assist as many families as the Annual Renewal Funding with support.

- Issue vouchers monthly until the maximum number of families that can be assisted is reached
- Utilize all means available to accurately verify family income to ensure households pay the appropriate share of the rent – including EIV’s new Income Validation Tool (IVT)
- Execute and collect on repayment agreements with families who fail to report income
- Review household composition and voucher size at the time of the annual recertification, and when participants request to move, to ensure that the household resides in an appropriately size unit, and that the rent for the unit under contract is reasonable
- Provide information to landlords about the benefits of the Housing Choice Voucher Program and encourage them to rent to more voucher holders

Progress Statement: *During the past five years, the Authority reached it maximum potential with its HCV program. We consistently use either 100% or 99% of our 254 HCV each month. We have kept up with existing and reduced further Repayment agreements, due to better use of EIV and interviewing techniques. The Authority still needs to institute a more regularly scheduled landlord recruitment event/efforts.*

B.4

Capital Improvements. *Not Applicable*

<p>B.5</p>	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe: <i>N/A</i></p>
<p>C.</p>	<p>Other Document and/or Certification Requirements.</p>
<p>C.1</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan? <i>(See attachment nj083a01)</i></p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. <i>N/A</i></p>
<p>C.2</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>C.3</p>	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations - Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>

C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements. <i>N/A</i></p>
D.	<p>Affirmatively Furthering Fair Housing (AFFH).</p>
D.1	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <p>1. Combat Housing Discrimination and Promote Equity</p> <ul style="list-style-type: none"> • Goal: Ensure equal treatment in housing opportunities, preventing discrimination in the renting, buying, and lending processes. • Strategy: <ul style="list-style-type: none"> ○ <i>Educate residents, landlords, and housing providers about their rights and responsibilities under the Fair Housing Act.</i> ○ <i>Increase outreach and education on fair housing laws, including protection against discrimination based on race, color, religion, national origin, familial status, sex, and disability.</i> ○ <i>Implement and enforce a local anti-discrimination policy for all housing programs within your authority.</i> ○ <i>Collaborate with legal aid organizations and advocacy groups to assist individuals who believe they are victims of discrimination.</i> <p>2. Support Housing for Vulnerable Populations</p> <ul style="list-style-type: none"> • Goal: Provide safe and stable housing for vulnerable groups, such as people with disabilities, seniors, and those experiencing homelessness. • Strategy: <ul style="list-style-type: none"> ○ <i>Create and support accessible housing options for individuals with disabilities, ensuring that new developments comply with accessibility requirements under the Americans with Disabilities Act (ADA) and the Fair Housing Act.</i>

D.1

- *Collaborate with local service providers to offer supportive housing for homeless individuals and families, including those transitioning from temporary shelters to permanent housing.*
- *Implement special programs that provide housing options for seniors, such as accessible units and support services tailored to their needs.*

3. Strengthen Community Engagement and Involvement

- **Goal:** *Ensure that diverse community stakeholders have a voice in fair housing planning and decision-making processes.*
- **Strategy:**
 - *Organize public meetings and focus groups to engage Secaucus residents, especially those from underrepresented communities, to gather input on housing needs and fair housing goals.*
 - *Partner with local advocacy groups, housing organizations, and community leaders to raise awareness of fair housing issues and gather feedback on current policies and programs.*
 - *Utilize surveys and data collection to better understand housing barriers, such as discrimination or lack of housing options, and incorporate community input into your local fair housing plans.*

4. Leverage HUD Funding and Resources

- **Goal:** *Maximize the use of available HUD funding and resources to support fair housing efforts in Secaucus.*
- **Strategy:**
 - *Apply for HUD grants and funding opportunities (e.g., Community Development Block Grants (CDBG), HOME Investment Partnerships Program, Housing Choice Voucher Program) to support fair housing initiatives and affordable housing projects.*
 - *Leverage federal, state, and local funds to support programs such as housing vouchers, homeownership assistance, and housing counseling services*

Attachment: nj083a01
Secaucus Housing Authority
Resident Advisory Board Consultation Process and Comments – FYB 2025

1. Resident notification of appointment to the Advisory Board

At beginning of PHA Plan process, sent out letter to all residents/participants of opportunity to serve on Resident Advisory Board

Please provide date

2. Resident Advisory Board Selection

Selection made from resident/participant response **Please provide date**

3. Meeting Organization

Schedule date to meet with Resident Advisory Board for input to PHA Plan

Please provide date

Notify Resident Advisory Board of scheduled meeting **Please provide date**

Hold Resident Advisory Board meeting **Please provide date**

4. Notification of Public Hearing

Schedule date for Public Hearing and place ad **March 24, 2025**

Notify Resident Advisory Board **Please provide date**

Hold Public Hearing meeting **May 8, 2025**

5. Documentation of resident recommendations and PHA's response to recommendations

Please provide the residents' recommendations/comments and the PHA response to each comment after each RAB meeting.

Attachment: nj083b01
Secaucus Housing Authority
VAWA Policy
(Taken from ACOP Policy)

Violence Against Women Reauthorization Act (VAWA)

Protects tenants and applicants, and affiliated individuals who are survivors of domestic violence, dating violence, sexual assault, and/or stalking (collectively VAWA violence/abuse) from being denied, evicted, or terminated from housing assistance based on acts of such violence against them. While VAWA, HUD's regulations, HUD forms, and other HUD guidance generally use the term "victim," this policy will use the VAWA 2022 preferred term "survivor," which will have the same meaning as "victim."

A. Who is Eligible for VAWA Protections

For the purposes of VAWA, the term "tenant" shall refer to the assisted family and members of the household on the lease.

1. Only tenants who are assisted by the PHA can invoke VAWA protections that apply solely to tenants.
2. Nondiscrimination and Equal Opportunity Requirements:
 - a. VAWA protections are not limited to women.
 - b. Survivors of VAWA violence/abuse are eligible for protections without regard to sex, gender identity, or sexual orientation.
 - c. Survivors cannot be discriminated against based on any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age.
 - d. As per the HUD's Equal Access Rule, the VAWA protections also cover eligible individuals and families regardless of actual or perceived sexual orientation, gender identity, or marital status.
 - e. Youth under the age of 18 years old living in an assisted household may invoke VAWA protections if the youth is a survivor of VAWA violence/abuse.
3. Citizenship and Immigration Status
 - a. VAWA protections are provided to tenants regardless of citizenship or eligible immigration status.
 - b. Self-Petitioners

Section 214 of the Housing and Community Development Act of 1980 states that HUD may not allow financial assistance to ineligible non-citizens, but assistance must not be denied while verifying immigration status.

- 1) VAWA also provides protections for "self-petitioners" who are noncitizens and claim to be victims of "battery or extreme cruelty" by their spouse or parent who is a U.S. citizen or lawful permanent resident (LPR).
- 2) VAWA covers the following types of battery or extreme cruelty: domestic violence, dating violence, sexual assault, and stalking.

- 3) Self-petitioners can indicate that they are in “satisfactory immigration status” when applying for assistance or continued assistance from a Section 214 covered housing provider.
 - a) Satisfactory immigration status means an immigration status which does not make the individual ineligible for financial assistance.
 - b) After the PHA verifies the immigration status in the Department of Homeland Security (DHS) Systematic Alien Verification for Entitlements (SAVE) System, the PHA will make a final determination as to the self-petitioner’s eligibility.
 - 4) Housing assistance and all other VAWA protections will be granted to the self-petitioner throughout the verification process until a final determination of the LPR status is made.
 - 5) If the final determination is to deny the VAWA self-petitioner or the LPR petition, the PHA will alert the petitioner and take actions to terminate the voucher assistance in accordance with existing PHA public housing requirements.
4. Affiliated Individual (replaced family member)
 - a. A spouse, parent, brother, sister, a child of that person, or a person to whom that individual stands in the place of a parent or guardian (for example, the affiliated individual is a person in the care, custody, or control of that individual; or
 - b. Any individual, tenant, or lawful occupant living in the household of that individual.
 5. Live-In Aides
 - a. Live-in aides are entitled to VAWA protections if the live-in aid is an applicant for PHA housing assistance.
 - b. Live-in aides could be an affiliated individual of a tenant and if the live-in aid as an affiliated individual is a victim of domestic violence, dating violence, sexual assault, or stalking.
 - c. The tenant with whom the affiliated individual is associated cannot be evicted or have assistance terminated on the basis that the affiliated individual was a victim of VAWA violence/abuse.
 6. Applicants

VAWA protections also cover applicants when they are applying for admission to the HCV program.

B. Who is Ineligible for VAWA Protections

Guests, unassisted members, and live-in aides of the family are ineligible for VAWA protections that are available only to tenants.

1. As a reasonable accommodation, a tenant can request VAWA protections based on the grounds that the live-in aid is a survivor of VAWA violence/abuse. In addition, other reasonable accommodations may be needed on a case-by-case basis.

2. Where a guest or unassisted member is a survivor of VAWA violence/abuse, a tenant cannot be evicted or have assistance terminated on the basis of the VAWA violence/abuse of the guest or unassisted member.
3. Unassisted members who are also on the lease may qualify by way of the lease for VAWA protections.

C. VAWA Notice of Occupancy Rights and Certification Form

1. The PHA will provide the Notice of Occupancy Rights, form HUD-5380, and the Certification Form, form HUD-5382, to each adult applicant and to each adult participant no later than at each of the following times:
 - a. At the time the applicant is denied assistance or admission;
 - b. At the time the individual is provided assistance or admission;
 - c. With any notification of eviction or notification of termination of assistance; and
 - d. During the 12-month period following December 16, 2016, either during the annual reexamination or if there will be no reexamination for the participant during the first year after the rule takes effect, through other means.
2. In accordance with Executive Order 13166 (Improving Access to Services for Persons with Limited English Proficiency), the PHA shall make available The Notice of Occupancy Rights and the Certification Form in multiple languages.

D. VAWA Notice of Occupancy Rights, HUD-5380

The VAWA Notice of Occupancy Rights explains the VAWA protections for applicants and for participants, including the rights to confidentiality and any VAWA protection limitations.

1. The PHA will provide the VAWA Notice of Occupancy Rights without changes to the core VAWA protections and confidentiality rights.
2. VAWA Protections for Applicants

If the applicant otherwise qualifies for HCV assistance the applicant cannot be denied admission or denied assistance because the applicant is or has been a survivor of VAWA violence/abuse.
3. Protections for Tenants
 - a. If a tenant is receiving HCV assistance, the tenant may not be terminated from participation or be evicted from the assisted unit because the tenant is or has been a survivor of VAWA violence/abuse.
 - b. If a tenant or an affiliated individual of the tenant is or has been the survivor of VAWA violence/abuse by a member of the tenant's household or any guest, the tenant may not be denied rental assistance or occupancy rights under HCV program assistance solely on the basis of criminal activity directly relating to that incident of VAWA violence/abuse.

E. VAWA Certification Form, HUD-5382

The Certification of Domestic Violence, Dating Violence, Sexual Assault, Dating Violence, or Stalking, and Alternative Documentation form is an optional way for survivors to comply with a written request for documentation about an incident or incidents of VAWA violence/abuse.

1. VAWA Certification Form
 - a. Provides that the survivor or someone on the survivor's behalf may complete the form.
 - b. Provides a list of alternative third-party documentation to satisfy a request by a PHA.
 - c. Explains the time period for responding to a written request for documentation.
 - d. Describes the confidentiality protections under VAWA.
 - e. Requires that the survivor or someone filling out the form on the survivor's behalf must answer 10 numbered questions and provide a brief description of the incident(s).
 - f. Clarifies that the name of the accused perpetrator does not have to be provided if it is unknown to the survivor or it cannot be provided safely.
 - g. Clarifies that the date and time of incident should be completed only if known by the survivor.
 - h. Requires the survivor or someone filling out the form on the survivor's behalf to certify the truth and accuracy of the information being provided and explains that false information could be the basis for denial of admission or termination of assistance.
2. The PHA will advise tenants and applicants that when the HUD-5382 is submitted on the survivor's behalf, the submission will take the place of the tenants or applicants submitting their own statement.

F. Certification or Documentation

1. Acceptance of a Verbal Statement
 - a. The PHA is not required to ask for documentation when an individual presents a claim for VAWA protections.
 - b. The PHA may choose to provide benefits to an individual based solely on the individual's verbal statement or other corroborating evidence.
 - c. The PHA will accept a verbal statement of an incident or incidents of VAWA violence/abuse if the PHA was aware of the abuse and encouraged the survivor to request VAWA protections.

2. Requesting Documentation

The PHA may choose to request an individual to document their claim of VAWA violence/abuse.

- a. The PHA must request the documentation in writing.

- b. Providing the survivor, form HUD-5382 does not constitute a written request for the documentation, unless the form HUD-5382 is accompanied by the written notice requesting the documentation.
 - c. The survivor may satisfy the PHA's written request for documentation by providing any one of the following:
 - 1) Form HUD-5382; or
 - 2) A document:
 - a) Signed by an employee, agent, or volunteer of a survivor service provider, an attorney, or medical professional or a mental health professional (collectively, "professional") from whom the survivor has sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse:
 - b) Signed by the applicant or tenant; and
 - c) That specifies, under penalty of perjury, that the professional believes in the occurrence of the incident of VAWA violence/abuse that is the ground for protection and remedies under the VAWA Final Rule, and that the incident meets the applicable definition of domestic violence, dating violence, sexual assault, or stalking.
 - 3) A record of a federal, state, tribal, territorial, or local law enforcement agency (may include a policy report), court, or administrative agency; or
 - 4) At the discretion of the PHA, a statement or other evidence provided by the tenant or applicant.
3. Time to Submit VAWA Documentation
- a. The PHA will require submission of documentation within 14 business days after the date that the individual received the written request for documentation.
 - b. The PHA may extend this time period at its discretion.
 - c. During the 14-business day period and any granted extensions of that time, no adverse actions, such as eviction or termination, can be taken against the individual requesting VAWA protection.
4. Third-Party Verification
- The PHA shall not require the survivor to provide third-party documentation of survivor status, unless:
- a. More than one tenant or applicant provides documentation to show they are survivors of VAWA violence/abuse and the information in one person's documentation conflicts with the information in another person's documentation; or
 - b. Submitted documentation contains information that conflicts with existing information already available to the PHA.

- c. The PHA shall give the tenant or applicant 30 calendar days from the date of the written request to provide such documentation.

G. Limitations of VAWA Protections

The tenant may invoke VAWA protections on more than one occasion and the PHA will not subject additional conditions that would adversely affect the tenant's tenancy because they have invoked VAWA protections. There are no limitations on the number of occasions a survivor can invoke VAWA protections.

1. Nothing in this Chapter limits the authority of the PHA, when notified of a court order, to comply with a court order with respect to:
 - a. The rights of access or control of property, including civil protection orders issued to protect a survivor of VAWA violence/abuse; or
 - b. The distribution or possession of property among members of a household.
2. The PHA may evict or terminate assistance to a tenant for any violation not premised on an act of VAWA violence/abuse that is in question against the tenant or an affiliated individual of the tenant.

The PHA will not subject the tenant who is or has been a survivor of VAWA violence/abuse or is affiliated with an individual who is or has been VAWA violence/abuse, to a more demanding standard than other tenants when determining whether to evict or terminate assistance.

3. The PHA may terminate assistance or evict a tenant if the PHA can demonstrate an actual and imminent threat to other tenants, PHA employees, or those employed at or providing services to the PHA would be present if that tenant or lawful occupant is not terminated from assistance or evicted.
 - a. An actual and imminent threat refers to a physical danger that is real, would occur within an immediate time frame and could result in death or serious bodily harm.
 - b. Words, gestures, actions, or other indicators can be considered an actual and imminent threat.
 - c. In determining whether an individual would pose an actual and imminent threat, the PHA will consider the following factors:
 - 1) The duration of the risk,
 - 2) The nature and severity of the potential harm,
 - 3) The likelihood that the potential harm will occur, and
 - 4) The length of time before potential harm will occur.

4. The PHA will utilize termination of assistance or eviction only when there are no other actions the PHA can employ to reduce or eliminate the threat, including but not limited to transferring the survivor to a different unit, barring the perpetrator from the property, and contacting law enforcement in order to keep the property safe to prevent the perpetrator from acting on a threat.
5. The PHA will terminate tenancy or assistance to any household member who is the perpetrator of VAWA violence/abuse or who engages in criminal acts of physical violence against family members or others.

H. VAWA Confidentiality

Given the significant safety issues faced by survivors of VAWA violence/abuse, it is critical that the PHA establish or update existing policies to maintain the confidentiality and privacy of survivors who seek protections under VAWA.

1. The PHA shall retain in strictest confidence all information pursuant to VAWA including the fact that an individual is a survivor of VAWA violence/abuse.
2. The PHA shall not allow any individual administering assistance on behalf of the PHA, in the employ of the PHA, or any persons within the PHA's employ (e.g., contractors) to have access to VAWA confidential information unless explicitly authorized by the PHA that specifically call for these individuals to have access to the information under applicable federal, state, or local law.
3. The PHA shall not enter the VAWA confidential information into any shared database or disclose the information to any other entity or individual, except to the extent that the disclosure is:
 - a. Requested or consented to in writing by the individual in a time-limited release;
 - b. Required for use in an eviction proceeding or hearing regarding termination of assistance; or
 - c. Otherwise required by applicable law.
4. Communicating with the Survivor

When communicating with an applicant, participant, or tenant who has requested VAWA protections, the PHA will take precautions to avoid inadvertent disclosure of confidential information to another individual or entity.

- a. The PHA will not leave messages that contain confidential information or refer to VAWA, the VAWA protections, or VAWA violence/abuse on the survivor's voicemail or with other individuals, including members of the survivor's household.
- b. The PHA will not send mail regarding VAWA violence/abuse (e.g., a written request to complete form HUD-5282, or written extension of the 14-business day timeframe to respond to the PHA's request for documentation) to the survivor's address as the perpetrator may have access to the survivor's mail.

5. The PHA may employ the following to address the challenges of collecting information from and communicating with survivors of VAWA violence/abuse to avoid unintentional disclosure:
 - a. Conduct the intake session in a private room, where the individual and staff person can talk without the risk of other staff or clients overhearing.
 - b. Explain the PHA's information sharing policies.
 - c. Clarify information sharing policies with referring/referral agencies and other service and business partners.
 - d. Communicate to the individual who in the PHA is responsible for handling questions or complaints about confidentiality.
 - e. Work with the tenants to make delivery arrangements of VAWA documents that do not place the survivor at risk.
 - f. Serve individuals off-site as needed or when appropriate.
 - g. Provide adequate time for the individual to review and sign forms.
 - h. Provide reasonable accommodations to permit individuals to follow or access any rules, policies, practices, or services, such as modifying a policy requiring that the survivor come into the office to pick up VAWA documents to instead deliver the form to the survivor.
 - i. ensuring effective communication with persons with disabilities, e.g., providing sign language interpreters for persons who are deaf, accessible documents and assistance filling out forms for persons with visual impairments or have low vision.
 - j. Provide interpretation and/or documents translated into the appropriate language when necessary for person with limited English proficiency.
 - k. Provide accessible documents or assistance filling out forms for individuals with disabilities Post confidentiality notices in the intake room and around other areas of the PHA.
 - l. Ensure relevant staff understand confidentiality policies and procedures through regular staff training.
 - m. Post notices about the importance of maintaining confidentiality throughout the office.
 - n. Direct staff to respond to third-party inquiries only after verifying that written client consent has been obtained.
 - o. Maintain distinct phone lines for certain purposes.
 - p. Use a PHA post office box to receive written correspondence.
 - q. Avoid using language referencing domestic violence or sexual assault in PHA names, program names, organization names, and staff titles.

I. VAWA Prohibition on Retaliation

Provides protections against retaliation for survivors and other persons who oppose acts made unlawful by VAWA, who seek to enforce VAWA's protections, or who participate in enforcement proceedings.

1. It is illegal for the PHA to discriminate against any person because that person has opposed any act or practice made unlawful by VAWA's housing provisions, or because that person testified, assisted, or participated in any related matter.
2. It is illegal for a PHA to coerce, intimidate, threaten, interfere with, or retaliate against any person who exercises or assists or encourages a person to exercise any rights or protections under VAWA's housing provisions.

J. Right to Report Crimes and Emergencies

Provides protections against actual or threatened penalties for persons requesting law enforcement or emergency assistance.

1. Landlords, homeowners, tenants, residents, occupants, and guests of, and applicants for, housing shall have the right to seek law enforcement or emergency assistance on their own behalf or on behalf of another person in need of assistance.
2. It is prohibited to penalize or threaten to penalize persons because they request assistance or report criminal activity of which they are a survivors or otherwise not at fault under the laws or policies adopted or enforced by "covered governmental entities," which is any municipal, county, or state government that receives funding under Section 106 of the Housing and community Development Act of 1974.

K. Compliance Process Review

The PHA is required to establish a VAWA compliance review process.

1. The PHA will:
 - a. Incorporate the VAWA compliance review process into its existing compliance review processes where possible,
 - b. Perform the VAWA compliance review on a regular basis,
 - c. Publicly disclose the VAWA compliance review assessment of the information collected;
2. Six Items for Compliance Review
 - a. Compliance with requirements prohibiting the denial of assistance, tenancy, or occupancy rights on the basis of domestic violence, dating violence, sexual assault, or stalking;
 - b. Compliance with VAWA confidentiality provisions
 - c. Compliance with the notification requirements
 - d. Compliance with the provisions for accepting documentation

- e. Compliance with emergency transfer requirements; and
 - f. Compliance with the prohibition on retaliation
3. The PHA will develop regulations to implement the VAWA compliance review in consultation with the appropriate stakeholders, which includes the following, but not limited to:
- a. Individuals and organizations with expertise in the housing needs and experiences of survivors of VAWA violence/abuse; and
 - b. Individuals and organizations with expertise in the administration or management of HUD programs subject to VAWA statutory requirements and protections.

L. VAWA FHEO Enforcement Authority

HUD and the U.S. Department of Justice shall implement and enforce VAWA consistent with, and in a manner that provides, the same rights and remedies as those provided for the Fair Housing Act.

Effective October 1, 2022, individuals who believe their VAWA rights have been violated may file complaints with HUD's Offices of Fair Housing and Equal Opportunity (FHEO) and General Counsel (OGC). The FHEO and OGC will begin investigating such complaints using HUD's existing Fair Housing Act complaint process.

VAWA Emergency Transfer Plan

The PHA shall adopt a VAWA Emergency Transfer Plan based on the HUD's model VAWA Emergency Transfer Plan which will allow tenants receiving HCV assistance and who are survivors of domestic violence, dating violence, sexual assault or stalking to request an emergency transfer if:

1. The tenant expressly requests the transfer; and
2. The tenant reasonably believes there is a threat of imminent harm from further violence if the tenant remains within the same dwelling unit that the tenant is currently occupying; or
3. In the case of a tenant who is a survivor of sexual assault, either the tenant reasonably believes there is a threat of imminent harm from further violence if the tenant remains within the same dwelling unit that the tenant is currently occupying, or the sexual assault occurred on the premises during the 90-calendar-day period preceding the date of the request for transfer.
4. The tenant who is a survivor of sexual assault may make an imminent harm request regardless of when or where the sexual assault occurred and the PHA may permit more than 90-calendar days from the date of the sexual assault.

5. The tenant may qualify for either an internal emergency transfer or external transfer.
 - a. An internal emergency transfer is the relocation of a tenant to another unit where the tenant would not be categorized as a new applicant; that is, the tenant may reside in the new unit without having to undergo an application process.
 - b. An external emergency transfer is the relocation of a tenant to another unit where the tenant would be categorized as a new applicant; that is the tenant must undergo an application process in order to reside in the new unit.
6. The tenant may seek an internal emergency transfer and an external emergency transfer concurrently if a safe unit is not immediately available.
7. The PHA shall maintain the existing VAWA strict confidentiality measure in its Emergency Transfer Plan as to not disclose the location of the new unit to the abuser.
8. The PHA will make the Emergency Transfer Plan available upon request and when feasible, make the plan publicly available.
9. The PHA will keep a record of all emergency transfers requested under its Emergency Transfer Plan and the outcome of the requests.
 - a. The PHA shall retain these records for a period of three (3) years or for a period of time as specified by program regulations.
 - b. The PHA must report the requests and outcomes to HUD annually.
10. An emergency transfer request must not be construed to supersede any PHA eligibility or other occupancy requirements.