

Brazoria County Housing Authority (BCHA) 2025 Annual Plan Update and Summary of Administrative Plan Changes

The BCHA 2025 Annual Plan and Administrative Plan are posted for public comment through July 1, 2024. The full Plan document is available for review at this website: <https://www.brazoriacountytx.gov/departments/housing-and-urban-development/housing>

2025 Annual PHA Plan Summary

BCHA identified four goals in its 5-year Plan. Provided below is an update on each of those goals:

Goal 1: Increase housing choice for assisted housing.

Progress: BCHA has continued to reach out and recruit new landlords to promote greater housing choice. Eight (8) new property owners were added to the program during the last program year.

Goal 2: Evaluate Payment Standards.

Progress: Payment standards and utility allowances were reviewed and adjusted to make housing more affordable for the applicants on the program.

Goal 3: Maintain High Performance SEMAP Scores:

Progress: BCHA continued to manage and operate an effective and efficient housing program as demonstrated by maintaining a SEMAP High Performer rating with HUD.

Goal 4: Staff shall continue to receive formal training.

Progress: Staff have participated in several new and refresher training courses. New U.S. Department of Housing and Urban Development's (HUD) training included HOTMA and NSPIRE trainings. HOTMA is the Housing Opportunities Through Modernization Act, approved by Congress in 2016, and is now being implemented by HUD. HOTMA is making substantial changes to the Housing Choice Voucher program operations. NSPIRE is the National Standards for Physical Inspection of Real Estate. NSPIRE updates how housing inspections will evaluate housing conditions.

Additional Actions: BCHA continues to expand housing opportunities for persons who are homeless by collaborating with the local homeless coalition and by pursuing funding opportunities to expand housing resources locally.

**SEMAP- Section 8 Management Assessment Program*

AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH)

Fair Housing Goal: Address shortage of rental housing in general and affordable rental housing specifically.

Describe fair housing strategies and actions to achieve the goal:

BCHA will continue to recruit new landlords to participate in the Housing Choice Voucher program to expand the availability of affordable rental housing throughout Brazoria County. During the last fiscal year, eight (8) new landlords/owners listed properties with BCHA.

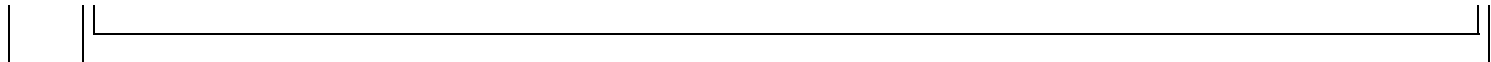
Fair Housing Goal: Address shortage of rental subsidies through Section 8 Housing Choice Vouchers by pursuing opportunities to add new vouchers and subsidies.

Describe fair housing strategies and actions to achieve the goal:

BCHA will continue to pursue opportunities to add vouchers and expand subsidies in our local program.

End of summary- 5/15/2024 (Draft PHA Annual Plan)

B.	Plan Elements.						
B.1	<p>Revision of Existing PHA Plan Elements. a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission? Y <input type="checkbox"/> N <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs. <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. <input checked="" type="checkbox"/> Financial Resources. <input checked="" type="checkbox"/> Rent Determination. <input checked="" type="checkbox"/> Operation and Management. <input checked="" type="checkbox"/> Informal Review and Hearing Procedures. <input checked="" type="checkbox"/> Homeownership Programs. <input checked="" type="checkbox"/> Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements. <input checked="" type="checkbox"/> Substantial Deviation. <input checked="" type="checkbox"/> Significant Amendment/Modification.</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>Operation and Management. Changes have been made to the BCHA Administrative Plan to add updates related to HOTMA and NSPIRE. See attachment for summary of Administrative Plan changes.</p>						
B.2	<p>New Activities. (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y <input type="checkbox"/> N <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Project-Based Vouchers</p> <p>(b) If Project-Based Voucher (PBV) activities are planned for the current Fiscal Year, 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.3	<p>Progress Report. Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. BCHA identified four goals in its 5 year Plan. Provided below is an update on each of those goals: Goal 1: Increase housing choice for assisted housing. Progress: BCHA has continued to reach out and recruit new landlords to promote greater housing choice. Eight new landlords were added to the program during the last fiscal year. Goal 2: Evaluate Payment Standards. Progress: Payment standards and utility allowances were reviewed and adjusted to make housing more affordable for the applicants on the program. Goal 3: Maintain High Performance SEMAP Scores: Progress: BCHA continued to manage and operate an effective and efficient housing program as demonstrated by maintaining a SEMAP High Performer rating with HUD. Goal 4: Staff shall continue to receive formal training. Progress: Staff have participated in several new and refresher training courses. New training included HOTMA and NSPIRE trainings. Additional Actions: BCHA continues to expand housing opportunities for persons who are homeless by collaborating with the local homeless coalition and by pursuing funding opportunities to expand housing resources locally</p>						
B.4	<p>Capital Improvements. - Not Applicable</p>						
B.5	<p>Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A <input type="checkbox"/> (b) If yes, please describe:</p>						
C.	Other Document and/or Certification Requirements.						
C.1	<p>Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) have comments to the PHA Plan? Y <input type="checkbox"/> N <input checked="" type="checkbox"/> (b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>						
C.2	<p>Certification by State or Local Officials. 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.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. 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. (a) Did the public challenge any elements of the Plan? Y <input type="checkbox"/> N <input checked="" type="checkbox"/> If yes, include Challenged Elements.</p>						
D.	Affirmatively Furthering Fair Housing (AFFH).						
D.1	<p>Affirmatively Furthering Fair Housing (AFFH). 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> <table border="1" data-bbox="159 1696 1539 2011"> <tr> <td data-bbox="159 1696 1539 1745">Fair Housing Goal: Address shortage of rental housing in general and affordable rental housing specifically.</td> </tr> <tr> <td data-bbox="159 1745 1539 1793"><u>Describe fair housing strategies and actions to achieve the goal</u></td> </tr> <tr> <td data-bbox="159 1793 1539 1871">BCHA will continue to recruit new landlords to participate in the Housing Choice Voucher program to expand the availability of affordable rental housing throughout Brazoria County.</td> </tr> <tr> <td data-bbox="159 1871 1539 1919">Fair Housing Goal: Address shortage of rental subsidies through Section 8 Housing Choice Vouchers by pursuing opportunities to add new vouchers and subsidies.</td> </tr> <tr> <td data-bbox="159 1919 1539 1967"><u>Describe fair housing strategies and actions to achieve the goal</u></td> </tr> <tr> <td data-bbox="159 1967 1539 2011">BCHA will continue to pursue opportunities to add vouchers and expand subsidies in our local program.</td> </tr> </table>	Fair Housing Goal: Address shortage of rental housing in general and affordable rental housing specifically.	<u>Describe fair housing strategies and actions to achieve the goal</u>	BCHA will continue to recruit new landlords to participate in the Housing Choice Voucher program to expand the availability of affordable rental housing throughout Brazoria County.	Fair Housing Goal: Address shortage of rental subsidies through Section 8 Housing Choice Vouchers by pursuing opportunities to add new vouchers and subsidies.	<u>Describe fair housing strategies and actions to achieve the goal</u>	BCHA will continue to pursue opportunities to add vouchers and expand subsidies in our local program.
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Form identification: TX484-Brazoria County Housing Authority, TX Form HUD-50075-HCV (Form ID - 319) printed by Daphne Lemelle in HUD Secure Systems/Public Housing Portal at 05/10/2024 12:21PM EST

Administrative Plan Summary of Changes (2024-2025)

Description: Several changes are proposed to the BCHA Administrative Plan. These plan updates are based on HUD rule changes, current operations, and BCHA staff and leadership recommendations. All changes are highlighted in the updated 2024-2025 Administrative Plan that is available for public review along with the 2025 PHA Annual Plan.

Provided below is a summary of the changes. Please note that this summary does not include every minor change made to the Admin Plan but is a summary of the substantial changes that are reflective of the rule changes made through the Housing Opportunities Through Modernization Act (HOTMA) that are effective today, updates to the housing inspection section to reflect HUD's National Standards for Physical Inspection of Real Estate (NSPIRE), and other updates necessary to reflect actual policies implemented by BCHA.

Summary of Changes—

- **Section I. E.—Privacy Rights and Consent Form (HUD Form 9886)**— updated section to be consistent with HOTMA rule that requires consent only once at admission to program for new admissions, and at recertification at current participants. Rule was effective January 1, 2024.
- **Section I. G. Program Administered by BCHA**—updated section to add new programs administered by BCHA. Programs include the Emergency Housing Voucher program and the Stability Voucher program.
- **Section III. J. Definition of Family Designation and Household. M) Joint Custody of Child/Children.** —updated this section to clarify that exceptions may be made to allow family to be included on the voucher if court ordered custody requires the child be included in the household.
- **Section III. M. Housing Authority's Options Regarding Denial/Termination of Assistance for Drugs, Alcohol Abuse and Criminal Activity. 10. Component of Screening Process**— This section updated to reflect current procedure and process used to obtain a criminal history report for an applicant. BCHA no longer requests reports from law enforcement agencies directly but completes the screening process using a Computerized Criminal History (CCH) database, as well as a search of the Brazoria County Criminal Record database.
- **Section IV. E. Occupancy Standards and Voucher Issuance.** – This section is updated to clarify that occupancy standard determines voucher size. Also removed paragraph reflective of an older policy changes in 2013.

- **Section V. E. Earned Income Disallowance** – This section updated to comply with HOTMA. The Earned Income Disallowance (EID) is discontinued effective January 1, 2024, by law.
- **Section V. I. Prorated Assistance for “Mixed” Families 3. Voucher Size-** Added section to clarify how voucher size is calculated for pro-rated assistance based on number of eligible family members in the household.
- **Section V. K. Zero Income or Very Low Income** – Updated section to add procedure that allows contributors to the family to submit written statements with valid identification regarding amounts provided to participants households to BCHA by electronic mail.
- **Section V. M. Total Tenant Payment Exceeds Gross Rent/Zero HAP Assistance**—Updated this section to comply with standard 60 day notice period prior to move.
- **Section VI. B. Verification Tiers Required by HUD and Required File Documents**—Updated this section to comply with new HOTMA guidance regarding Level 4 Written Third-Party Verification. Also update procedure to include verification documents may be provided by applicant or participant through hand delivery, mail, fax or electronic mail.
- **Section VI. D. Release of Information-** Updated this section to be consistent with HOTMA implementation and regarding the submission of the HUD 9886 form only once and not annually.
- **Section VI. E. Authority to Obtain Criminal History Records-** Updated this section to clarify the use of a Criminal Conviction Database to obtain criminal record history, and that such histories will be obtained at annual certification, when adding a household member over the age of 18, or when a family moves.
- **Section VI. G. Receipt of Information from Law Enforcement Agency or Computerized Criminal History (CCH) Databases-** Updated this section to reflect use of computerized criminal history databases.
- **Section VII. National Standards for the Physical Inspection of Real Estate (NSPIRE) – formerly Housing Quality Standards (HQS)-** This section renamed from HQS to NSPIRE the newly issued standards to be effective October 1, 2024. Throughout the document HQS has been replaced with NSPIRE.
- **Section VIII. B. Eligible Unit Types.** Removed Congregate Housing and Single Room Occupancy as eligible unit types from this section to be consistent with Section I. M. Eligible Housing Types Not Administered by Brazoria County.
- **Section VIII. H. Execution of HAP Contract. 3.** Added statement that Director may approved lease dates other than the first of the month.

- **Section VIII. J. Manufactured Homeowners Leasing Space**—Added statement that BCHA has established utility allowances for manufactured home space rental.
- **Section XI. Payments to Owners/Landlords C. Change of Ownership/Payee-** Updated this section to reflect current process for change of ownership and paperwork required.
- **Section XII. Annual and Interim Re-Certification.** Added process for annualizing income for shorter periods of time when it is not feasible to calculate a level of anticipated income over 12-month period, for example when income is seasonal or cyclic.
- **Section XIII. Termination of Assistance, B. Housing Authority Termination of Assistance-** This section reorganized to clarify rules regarding when BCHA may terminate assistance.
- **Section XVI. Portability- A. Outgoing Housing Choice Vouchers (Initial PHA) (Port Out).** – Revised paragraph 8 to be consistent with PIH Notice 2016-09 to add required policies in how families will be informed if portability is denied due to insufficient funding, how long the family’s request will remain open for consideration, and how families will be notified of when funds become available to port out.

Glossary:

Added:

- **HOTMA-** Housing Opportunities Through Modernization Act
- **NSPIRE-** National Standards for the Physical Inspection of Real Estate