



Staff Reports

File #: 194-2021, **Version:** 1

To: Honorable Chair and Commissioners
From: Vincent Smith, Community Development Director
Prepared By: Lark Ferrell, Housing Manager

TITLE:
Housing Choice Voucher Program Administrative Plan

RECOMMENDED ACTION:

Adopt a resolution approving an amended Section 8 Housing Choice Voucher Program Administrative Plan.

DISCUSSION:

The Section 8 Housing Choice Voucher Program Administrative Plan (the “Administrative Plan”) is a policy document that is used to ensure that the Section 8 Housing Choice Voucher Program (the “Program”) is administered in compliance with Housing and Urban Development (HUD) regulations and local policy. Each chapter of the Administrative Plan deals with different aspects of program implementation. For the most part, federal regulations dictate the way the Program will be implemented. However, HUD requires that the Housing Authority (the “HACN”) establish local policies for the administration of the Program in accordance with HUD regulations.

The Administrative Plan is a necessary reference tool for the HACN staff to administer the Program accurately and to ensure that all applicants and participants are treated in a fair and equitable manner. Federal regulations for the Program are often extensive and complex. For that reason, it is important that the document is comprehensive, up to date, and meets all federal requirements. The current Administrative Plan was adopted in 2008 and has been amended multiple times since to meet new program regulations, to address changes in program operations, and to incorporate requirements of new grant applications.

HUD regulations require changes to the Administrative Plan be adopted by the Housing Authority Board after a 45-day public notice. However, the Coronavirus Aid, Relief and Economic Security (CARES) Act, which was adopted in response to the COVID-19 pandemic, provided HUD the authority to waive statutory and regulatory requirements for the Housing Choice Voucher Program. HUD previously waived the requirement that changes to the Administrative Plan be adopted by the governing board after a 45-day public notice and allowed the Housing Authority to implement the changes prior to approval by the HACN Board. Under HUD’s Public and Indian Housing (PIH) Notice 2021-14(HA), HUD extended the waiver. Therefore, the Housing Authority may continue to adopt revisions to its administrative plan without HACN Board approval until September 30, 2021 provided

the amendments are adopted by the HACN Board no later than December 31, 2021.

This item is to formally adopt amendments to the Administrative Plan made on March 31 and April 10, 2021. Specifically, since the last Administrative Plan update, staff amended the Administrative Plan to add the ability for the Housing Authority to conduct a limited opening of the Section 8 Housing Choice Voucher waiting list for referrals from the Napa Continuum of Care's (CoC's) Coordinated Entry System for Mainstream and Non-Elderly Disabled (NED) eligible households (both are special purpose voucher programs for persons under 62 years of age and disabled) if the waiting list has been fully exhausted of Mainstream and NED eligible households. The CoC's Coordinated Entry System is the system used to identify vulnerable homeless persons in the community in need of housing and other services. HUD regulations encourage housing authorities to work with CoC's to help provide permanent housing assistance to highly vulnerable persons who have, or are, experiencing, homelessness. The Administrative Plan was also amended to remove the COVID preference which had been in place for the past year. This preference proved to be difficult to administer due to the delays between the date an applicant applied for the waiting list and the date the applicant's name was pulled for a voucher. Additionally, the appendix to the Administrative Plan was updated to add an additional waiver which allows the Housing Authority to consider COVID-related impacts as "good cause" to extend the term of a Family Self Sufficiency Program participant's Contract of Participation.

FINANCIAL IMPACTS:

There is no financial impact related to this action.

CEQA:

The Community Development Director has determined that the Recommended Action described in this Agenda Report is not subject to CEQA, pursuant to CEQA Guidelines Section 15060(c).

DOCUMENTS ATTACHED:

ATCH 1 - Resolution

EX A - Administrative Plan

ATCH 2 - Administrative Plan Amendments

NOTIFICATION:

The amendments were posted on the City of Napa Housing Division's web page. Additionally, Abode Services and Napa County Division of Housing and Homeless Services were notified of the proposed amendments.