



NOTICE OF A SPECIAL MEETING

April 10, 2024

6:00 PM

Post House, 40 Clinton Avenue

To: Rich Ostuw
John Coff
Lester McKoy
Divya Malhotra
Alexandro Morris

You are hereby notified of a Special Meeting of the Commissioners of the Housing Authority of the City of Stamford d/b/a Charter Oak Communities to be held Wednesday, April 10, 2023, at 6:00 p.m. via Zoom.

Agenda

1. Call to order
2. Agency Plan overview by Executive Director
3. Resolutions:
 - 24-10: Approve the 2024 Annual Agency Plan
 - 24-11: Approval of Capital 2024 Capital Fund Program
4. Executive Session
Legal Matters, Real Estate Items, Personnel Items.
5. Adjourn

HOUSING AUTHORITY OF THE CITY OF STAMFORD
D/B/A CHARTER OAK COMMUNITIES
22 Clinton Avenue
Stamford, CT 06901

Board Meeting Date: April 10, 2024

Resolution Number: 24-10

RESOLUTION

Subject: Approve the 2024 Annual Housing Agency Plan

Background: Housing Authorities are required to prepare an updated Agency Plan as required by Section 511 of the Quality Housing Work Responsibility Act of 1998 (QHWRA). As has been the practice since 1999, the HACS has prepared its annual submission. This is the third year of the current five-year cycle.

The Agency Plan process requires a Public Hearing at the end of a 45-day comment period. Between the initial Legal Notice and the scheduled date of the Public Hearing, which was April 10, 2024.

A Legal Notice was published announcing the ability for any member of the public to provide written comments to the HACS via email or by phone with a deadline of midnight April 10, 2024.

The Plan has been prepared by HACS Senior Staff and with the opportunity for residents to provide input through Resident Advisory Board (RAB) process.

Resolution: Be it resolved by the Commissioners of the Housing Authority of the City of Stamford d/b/a Charter Oak Communities that the 2024 Housing Agency Plan is hereby approved.

Natalie Coard
Executive Director

**HOUSING AUTHORITY OF THE CITY OF STAMFORD
D/B/A CHARTER OAK COMMUNITIES
22 Clinton Avenue
Stamford, Connecticut 06901**

Board Meeting Date: April 10, 2024

Resolution Number: 24-11

RESOLUTION

**Subject: Approval of the Capital Fund Program Annual Statement and Five-Year Plan
2024 Capital Fund Program CT26P007501-24 Capital Improvement Grant**

Background: The Housing Authority of the City of Stamford will execute the Amendments to the 2024 Capital Fund Program (CFP) annual submission. This amendment finalizes the 2024 CFP formula amount. The total grant amount for this year's Capital Improvement Grant is \$1,113,921.00 for Capital Repair Projects. The attached Annual Statement reflects the final CFP formula amount. Additionally, the 2024 Five Year Plan is included for approval.

Resolution: **Be it resolved, that the Board of Commissioners of the Housing Authority of the City of Stamford approve the Annual Statement and Five Year Plan for the FY 2025 Capital Fund Capital Improvement Grant in the amount of \$1,113,921. (See attached forms HUD-50075.1 & 50075.2)**

Peter Stothart
Staff Member Submitting Resolution

Memorandum to the COC Board of Commissioners on the FYE 2025 Agency Plan

With this year's Housing Agency Plan (Plan), Charter Oak Communities (COC) enters the first (1) year of its sixth (6) five-year cycle. COC is submitting as a Standard Performer. This is the FYE 2025 Agency Plan.

It would be customary for the average Public Housing Authority (PHA) to have engaged a re-baselining of their Plan as part of the start of a new five-year cycle, however as COC conducts an annual planning cycle both enterprise-wide and by program, the Goals & Objectives carried in the new Agency Plan are fresh and on topic. Most of the Goals & Objectives are "ongoing" activities with open time horizons.

The COC should have completed the conversion under its Rental Assistance Demonstration (RAD) Program participation by end of June 2024 resulting in a Low-Income Public Housing (LIPH) Program consisting primarily of Stamford Manor and with a combined LIPH unit count of less than 250, an essential target for "next steps".

The next major step for the LIPH Program is the conversion of Stamford Manor using a portfolio repositioning tool that becomes available once the LIPH unit count is below 250 units. It is called Streamlined Voluntary Conversion (SVC). HUD requires that any PHA that wants to use SVC commit to the full termination of the LIPH Annual Contribution Contract (ACC) at the front-end of the SVC administrative approval process.

While that COC will have an overall unit count equal to (or perhaps greater) than its LIPH unit count when the LIPH Program is terminated, it will no longer be eligible for LIPH funds and any LIPH resources such as Faircloth Amendment rental subsidies that have not been otherwise brought online. ACC termination will not occur before the completion of any SVC projects AND the submission of the last Single Audit that includes the LIPH Program but without any LIPH units remaining.

The timeframe for the SVC of the remaining LIPH Units is fully within the control of the COC and the commitment to terminate the ACC only becomes necessary upon initiation of the SVC HUD approval process. Therefore, the exact schedule remains an open set of choices. Work will be required to fully prepare for the LIPH Program termination as the COC will no longer receive Capital Fund Program (CFP) modernization grants or be eligible for LIPH grants and funding.

Although the Capital Fund Program (CFP) has administratively been separated from the Agency Plan submission, the two remain "joined at the hip". A copy of the draft CFP Annual Statement and Five-Year Plan was available as part of the consultation and public comment

process. These program documents were available for review by the public and program participants.

One major consequence of the completion of the RAD conversions is that the CFP Grant amount will drop by as much as an estimated 1/3. Given the current roughly \$1.1m this will drop the formula amount to an estimated \$650k. Upon termination of the LIPH Program Annual Contributions Contract (ACC), all resources available through appropriations under Section 9 of the 1937 Housing Act will end, be recaptured, or be donated to an entity acceptable to HUD pursuant to the requirements for closeout of federal grant programs found at 2 CFR 200.

This year's submission **no longer includes** as an Attachment a statement and policy excerpt on HUD's **deconcentration requirements** for the LIPH Program.

Other Plan components with which you are most familiar include **Attachment A**, the Goal & Objectives; and **Attachment C**, Accomplishments for the fiscal year ending 6/30/25.

Attachment B, which is a Summary Table for the COC's Project-based Voucher (PBV) Program. The PBV Program has grown in size and complexity and the summary information merits its own attachment.

Attachment D is the Five Year and the Annual Statement for the Capital Fund Program. **Attachment E** is the required Violence Against Women Act (VAWA) Policy Statement, which is not included in your review copy as it is identical to last year's attachment.

Attachment F, which is also not included in your packet, will be the transmittal letter and required certifications. Attachment F will also include copies of the Legal Notice.

You may notice in the body of the Plan, one pages 4-5, a request by HUD for information on the COC's actions to comply with existing and pending requirements for Affirmatively Furthering Fair Housing (AFFH). HUD issued a revised template two years ago that includes the questions on pages 4-5 and since that time, HUD has issued the AFFH Proposed Rule.

It is likely that the Final Rule will be issued by the end of this calendar year initiating a roughly 24-month cycle for all PHAs, City and State governments that receive HUD funding to take steps to comply. HUD funding recipients will need to develop an "Equity Plan" with substantial community input and in HUD's own words, "ambitious" goals. HUD will be posting submitted plans on its own website and taking direct public comments. AFFH is a requirement taken directly from Title VI of the 1968 Civil Rights Act and lack of proper compliance in reaching an approvable Equity Plan has major repercussions to any entity that administers HUD Programs. It's a matter for which the BOC should be aware given its high profile among advocates and program beneficiaries,