



## **Executive Summary of the Agency Plan for Fiscal Years 2025-2030**

The Agency Plan identifies goals for the next five years, significant program policies, and financial resources for the Los Angeles County Development Authority's (LACDA) Public Housing and Housing Assistance Programs. Additionally, the Agency Plan updates information on housing needs, housing strategies, and other program and management data.

The Agency Plan includes the following attachments: Resident Advisory Board comments, the Admissions and Continued Occupancy Policy (ACOP) for the Public Housing Program, and the Section 8 Tenant-Based Program Administrative Plan.

### **Annual Plan Timeline**

- The LACDA must provide a draft Agency Plan for public review and comment for 45 days: December 30, 2024, through February 13, 2025.
- Public comments are taken, recorded, and considered in developing the Agency Plan.
- Housing Advisory Committee approval is on March 19, 2025.
- The Board of Commissioner public hearing and approval is on April 08, 2025.
- Annual Plan due to the Department of Housing and Urban Development (HUD) by April 17, 2025.
- HUD approval 75 days after submission.
- Agency Plan effective July 1, 2025.

The ACOP and Administrative Plan include language changes that are statutory, regulatory, and/or that clarify existing policy. Additionally, the LACDA is providing the last Annual update to the Agency Plan for Fiscal Year (FY) 2020-2024 and proposing the following major changes to the Public Housing and Housing Assistance Programs for FY 2025-2026.

---

### **LACDA Five (5)-Year Goals (FYs 2025-2030)**

#### **1. Improve the Availability and Quality of LACDA Housing**

Objectives:

- Explore ways to increase housing opportunities for target populations (i.e., chronically homeless, special needs families, transition-aged youth).
- Initiate the repositioning of the Public Housing portfolio utilizing Rental Assistance Demonstration (RAD) strategies to generate long-term viability and revenue to create a more stable and sustainable platform.
- Increase the number of Public Housing units with accessibility features to address increased demand.
- Explore ways to reduce the carbon footprint in Public Housing and keep energy costs low for Public Housing residents.
- Expand the supply and provide opportunities for assisted and affordable housing through the use of project-based vouchers and the acquisition of multi-family properties.

## **2. Promote Self-sufficiency and Provide Supportive Services**

Objectives:

- Maximize the number of participants in self-sufficiency programs to develop employment potential and boost quality of life.
- Develop partnerships with community-based organizations to develop innovative programming and strategies that provide families with opportunities to improve their quality of life through socioeconomic, educational, and health services.

## **3. Address Homelessness in Los Angeles County**

Objectives:

- Pioneer county-wide roadmaps that carve out pathways for implementing unconventional and unprecedented strategies to address homelessness.
- Coordinate with other county agencies and community-based organizations to prevent, connect, house, and stabilize unsheltered populations.

## **4. Identify and Utilize Technology to Enhance Operational Effectiveness and Efficiency in the Delivery of Housing Assistance Services**

Objectives:

- Provide access to online services through the Yardi's Rent Café portal.
- Enrich customer service experience through the annual Business Automation Plan and other assistive technological systems.
- Collaborate with Public Housing Agencies and county partners to implement innovative programmatic and technological practices.
- Explore methods to bridge the digital divide gap to promote and provide digital equity to assisted families.

---

## **Admissions and Continued Occupancy Policy (ACOP) and Administrative Plan Proposed Policies**

Below are the proposed joint major policy changes for the Public Housing and Section 8 tenant-based rental assistance programs, effective **July 1, 2025**.

### **1. Waiting List Purge**

Currently, the LACDA's policy allows the purging of the Public Housing and Housing Choice Voucher (HCV) waiting lists at least once a year by a mailing to all applicants to ensure that the waiting list is current and accurate.

Effective July 1, 2025, the LACDA will purge its waiting lists at least once every three (3) years by a mailing and email blast to all registrants to ensure that the waiting lists are current.

### **2. Waiting List Registration**

Currently, when a family registers for the LACDA waiting list, preliminary information is collected, including the family's address, social security number, date of birth, income, family composition, and disability status.

Effective July 1, 2025, the LACDA will expand the information collected during a family's registration process. Additionally, registrants can update any changes in their circumstances or information at any time by reporting in writing or updating their online portal account in the LACDA's HARP system.

During the registration process, whether through the application phone line or website, the LACDA will obtain the following information:

- Residential, mailing, and/or employment address (if applicable) of the head of household;
- Name, date of birth, and social security number of head of household, co-head/marital type partner, and each additional member;
- Household's gross annual income;
- Referral from an Agency;
- Disability status for each member;
- Veteran status;
- Homeless status;
  - Registrants experiencing homelessness within LACDA's jurisdiction will not require residency verification until they are selected from the waitlist. Once selected, verified homeless registrants living within the LACDA's jurisdiction will qualify for the local preference.
- VAWA status;
- Accessibility requirement, if any (need for an accessible unit with specific features);
- Date and time of registration and registration/confirmation number;
- Admission preference, if any;
- Race and ethnicity of the head of household;
- The specific Public Housing waitlist(s) selected;
- Email address and contact number;
- Registrants preferred designated contact method; and
- If applicable, a point of contact (i.e., emergency number, social services contact person, etc.).

---

## **Admissions and Continued Occupancy Policy (ACOP) Proposed Policies**

Below are the proposed major policy changes for the Public Housing program.

### **1. Preference for Homeless Families**

Currently, the LACDA provides a countywide waiting list preference for homeless families. The preference is limited to 30% of the number of vacant general occupancy Public Housing units available on July 1 of each fiscal year. The family must consist of two (2) or more persons, with one (1) member being under the age of 18 or a single elderly and/or disabled person. Victims of domestic violence, dating violence, sexual assault, or stalking receive the same admissions preference as homeless families.

Effective July 1, 2025, the LACDA will provide an expanded waiting list homeless preference, limited to three (3) households per fiscal year, for each of the family housing developments at Carmelitos, Nueva Maravilla, and Harbor Hills.

To qualify for this preference, homeless families may be referred by a Joint Powers Authority (JPA), County agencies or Community Based Organizations (CBOs) with a

contract or Memorandum of Understanding (MOU) in place with the LACDA; or the family may self-certify homeless status. The LACDA will verify the family's self-certification in accordance with the Verification of Preference Status within this ACOP. The referring agency must provide a certification of the family's homeless status pursuant to Section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302).

The LACDA will evaluate the results of admitting limited number of homeless families to determine necessary program adjustments in support of the long-term success of homeless families and LACDA communities.

## 2. Site-Based Waiting Lists (SBWL)

Currently, there are 13 SBWLs, of which seven (7) are designated for elderly families. The elderly designated SBWL are,

Carmelitos Senior	Long Beach, CA
East County Senior	East Los Angeles, CA
Foothill Villa Senior	La Crescenta, CA
Marina Manor Senior	Marina Del Rey, CA
Orchard Arms Senior	Valencia, CA
South Bay Gardens Senior	South Los Angeles, CA
West Knoll/Palm Apartments	West Hollywood, CA

Effective July 1, 2025, the Palm Senior Apartments and West Knoll Senior Apartments will be separate SBWLs and will no longer be combined. In addition, Francisquito and Whittier Manor Senior Apartments will be separate SBWLs and will no longer be combined with East County Senior SBWL. This will increase the number of elderly designated SBWLs from seven (7) to ten (10), for a total of 16 Public Housing SBWLs (combined senior and family).

Carmelitos Senior	Long Beach, CA
East County Senior	East Los Angeles, CA
Foothill Villa Senior	La Crescenta, CA
Francisquito Villa	La Puente, CA
Marina Manor Senior	Marina Del Rey, CA
Orchard Arms Senior	Valencia, CA
Palm Senior	West Hollywood, CA
South Bay Gardens Senior	South Los Angeles, CA
West Knoll	West Hollywood, CA
Whittier Manor	Whittier, CA

## 3. Tenant Payment Agreements (TPA)

Currently, the LACDA usually asks that the household pay an initial lump sum (in an amount determined by the LACDA), with the remaining balance to be paid in equal payments over a period of time not to exceed 12 months for amounts under \$2,400 or 24 months for any amount in excess of \$2,400.

Effective July 1, 2025, the LACDA will not enter into a Settlement Agreement with the assisted family when the repayment balance debt exceeds \$2,400; however, LACDA may enter into a repayment agreement if the balance can be paid within 12 months for amounts under \$1,200 or within 24 months for any amounts in excess of \$1,200 but not to exceed \$2,400 of the contract execution date. The LACDA will pursue termination of housing

assistance and take legal proceedings for possession of the unit if the family does not meet the eligibility criteria for repayment plans or is in breach of the Agreement.

The LACDA reserves the right to waive the balance debt **limit** and to increase the repayment timeframe on a case-by-case basis, depending on the reason the household owes that debt. In such cases, the LACDA will document the reason for waiving the balance debt limit in the household's file.

#### **4. Community Service and Self-Sufficiency Requirement (CSSR): Tenant Reporting Timeframe**

Currently, when an exempt individual becomes nonexempt during the 12-month lease term, the family is responsible for reporting this change to the LACDA within five (5) business days.

Effective July 1, 2025, adult resident(s) must report within ten (10) calendar days changes in their circumstances that affect the CSSR non-exempt/exempt status (i.e., public assistance recipient, employment, student, disability status, etc.) during the 12-month lease term.

#### **5. CSSR: Staff Turnaround Timeframe**

Currently, within ten (10) calendar days of a family reporting such a change or the LACDA determining such a change is necessary, the LACDA will provide written notice of the effective date of the requirement and a documentation form on which the family member may record the activities performed and number of hours contributed.

Effective July 1, 2025, the LACDA will give the family written notice within 30 calendar days of receiving the reported change.

#### **6. Resident Unit Transfer Request**

Currently, the beneficiary of a transfer must repay any debts owed to the LACDA related to the pre-transfer unit. To assure that a Resident who is the beneficiary of a transfer satisfies any debts owed to the LACDA related to their pre-transfer unit, the transferring resident shall enter into a repayment agreement that will be an Addendum to the Lease Agreement of the new residence.

Effective July 1, 2025, the LACDA will not approve or authorize a resident-initiated unit transfer when the family has an outstanding balance due to the LACDA.

Except for emergency or LACDA mandatory transfers, under these circumstances, the transferring resident shall enter into a repayment agreement that will be identified as "Repayment Agreement Addendum to the Los Angeles County Development Authority Public Housing Lease Agreement." The failure of the transferring Resident to pay the debts owed to the LACDA related to their pre-transfer unit shall be a material breach of the Lease Agreement for the new residence.

#### **7. Resident Request to Transfer Process**

Currently, resident-initiated transfers, whether to another unit or development, require submitting a Resident Request to Transfer Form (RRTF) to the site Management office. Within ten (10) calendar days, the Property Manager will review the request and determine

if the resident is in good standing with the LACDA, has met the 24-month residency requirement, and has not transferred within the last four (4) years.

Effective July 1, 2025, Public Housing resident(s) must submit a completed Resident Request to Transfer Form (RRTF) to their respective site Management Office. The LACDA will provide a written response within 30 calendar days from receipt of the RRTF. Except for emergency or LACDA mandatory transfers, the resident must be in good standing with the LACDA, have met the 24-month residency requirement, and have not transferred within the last four (4) years.

## **8. Criminal Background Check**

Currently, the LACDA conducts criminal background screening for applicants and new member add-ons during the suitability and eligibility process.

Effective July 1, 2025, the LACDA will complete a criminal background check and registered sex offender screening when member(s) declare that they have been cited, charged, arrested, and/or convicted for any drug-related, violent, sex-related, or other criminal activity between annual reexaminations. The LACDA will pursue the necessary action delineated in the current LACDA policies.

## **9. Preference for Tenant-Based and Project-Based Voucher (PBV) Families Displaced Due to Housing Quality Standards (HQS) Non-Compliance**

Currently, there is no preference in the Public Housing waitlist for LACDA HCV families displaced due to the termination of Housing Assistance Payment (HAP) Contracts between the LACDA and the owner. HAP Contract terminations result from HQS deficiencies noted on the unit and the owner fails to make the repairs within the period established by the LACDA in the notice of abatement.

Effective immediately, if a LACDA HCV family is unable to lease a new unit within the period provided by the LACDA, the LACDA will offer the family a place on the Public Housing waitlist(s) with a selection preference for the appropriate-size public housing unit. If the family accepts the offer, they will be granted the preference and must qualify based on the ACOP's suitability and eligibility criteria.

Below are the proposed policy changes for the Public Housing program based on the Voluntary Compliance Agreement (VCA).

## **10. LACDA Staff Trainings**

Currently, the ACOP does not explicitly state training criteria for staff.

Effective July 1, 2025, LACDA's respective staff shall complete an annual Fair Housing Training (e.g., HUD or other Vendor training). Newly hired staff who become involved in any stage of the application, screening, and leasing process must complete a mandatory Fair Housing Training within 30 days of their hire date.

The training shall include Staff's obligations under Title VI, the Violence Against Women Act, the Fair Housing Act, and other civil rights requirements.

LACDA shall provide HUD with a written certification stating the training date and the name and position of each employee who attended and completed it.

## **11. Waiting List Registration Guidance**

Currently, the LACDA provides guidance to registrants when requested, but it was not explicitly stated in the ACOP.

Effective July 1, 2025, The LACDA will provide registrants guidance on properly completing the initial registration, particularly for listing a residence, including a mailing address if the registrant is experiencing homelessness. The guidance shall also include information on how to update their residential/ mailing address, including family composition. The LACDA will also inform the registrant on what to expect in future correspondences with the LACDA and how the LACDA plans to send future communications and notices to the registrant/applicant. The ACOP will be revised accordingly.

## **12. Waiting List Information**

Currently, the waiting list contains preliminary information entered by registrants, including the family's address, social security number, date of birth, income, family composition, and disability status.

Effective July 1, 2025, the waiting list will now request from registrants and house the following information for each applicant listed:

- Residential, mailing, and/or employment address (if applicable) of the head of household;
- Name, date of birth, and social security number of head of household, co-head/marital type partner, and each additional member;
- Household's gross annual income;
- Referral from an Agency;
- Disability status for each member;
- Veteran status;
- Homeless status;
- VAWA status;
- Accessibility requirement, if any (need for an accessible unit with specific features);
- Date and time of registration and registration/confirmation number;
- Admission preference, if any;
- Race and ethnicity of the head of household;
- The specific Public Housing waitlist(s) selected;
- Email address and contact number;
- Preferred designated contact method; and
- If applicable, a point of contact (i.e., emergency number, social services contact person, etc.).

## **13. Updating the Waiting List**

Currently, to update the waiting list, the LACDA will send an update request via first-class mail to each family on the waiting list to determine whether the family continues to be interested in and qualifies for the program.

Effective July 1, 2025, the LACDA shall utilize a variety of contact methods when attempting to communicate with an applicant who indicates in any initial registration

material(s) that they are experiencing homelessness within the LACDA's jurisdiction, including, but not limited to mail notification, email, phone calls, and contact with a designated point of contact, such as a family member or a social service agency. The LACDA shall keep a record of attempts to contact an applicant.

#### **14. Removal from the Waiting List**

Currently, should an applicant fail to respond within the established due date, they will be removed from all selected waiting lists. If a letter is returned by the U.S. Postal Office with a forwarding address, it will be considered as 'returned undeliverable,' and the applicant will be subject to removal from all selected waiting lists.

Effective July 1, 2025, applicants who fail to respond by the established due date will be removed from all selected waiting lists. If a letter is returned by the U.S. Postal Office and no contact has been established via mail notification, email, phone calls, or contact with a designated point of contact, the applicant will be subject to removal from all selected waiting lists.

#### **15. Registrants Indicating Homelessness**

Currently, all registrants must submit verification(s) to support their preference(s).

Effective July 1, 2025, registrants experiencing homelessness within the LACDA's jurisdiction will not require residency verification until selected from the waitlist.

Whenever a registrant has indicated homelessness and has not been referred to the LACDA by a Community-Based Organization (CBO), the LACDA will assign the registrant the Homeless Preference and verify the homeless status during the selection process.

#### **16. Verification of Preference Status**

Currently, the LACDA has expanded the acceptable verifications for families claiming homelessness as well as residency.

Effective July 1, 2025:

1. Homeless families: May qualify for this preference via a referral by a Joint Powers Authority (JPA), County agencies, or CBOs with a contract or Memorandum of Understanding (MOU) in place with the LACDA. Additionally, the LACDA will require partner agencies to use a Coordinated Entry System for homeless referrals. The referring agency must provide a certification of the family's homeless status.

Homeless families may qualify for this preference whenever a registrant has indicated in the initial registration materials living in homelessness and has not been referred to the LACDA by a JPA, County agency, or CBO; the LACDA agrees to assign this applicant the Homeless Families Preference. These applicants will go through a flexible system of allowable methods for verifying eligibility for this preference during the selection/application stage. The flexible verification methods include:

- a. Third-Party Verification ("TPV") from JPA, County agency, or CBOs with which the LACDA has an established contract or an executed Memorandum of Understanding; and/or,
- b. TPV from landlord/lessee, utility company, employer, school, DMV, State of California (voter registration, state-issued identification), credit reporting agency, financial institution, U.S. Postal Service, medical institution/provider,



faith-based organization, social service organization, housing/transitional shelter, IRS, or California Franchise Tax Board.

2. Residency preference: Include families that live, work, or have been hired to work in the LACDA's jurisdiction.

The range of documentation and information considered in verifying all applicants' eligibility for the Residency Preference at the selection stage has been updated to increase opportunity and flexibility. Acceptable third-party documentation is deemed current if they are dated within 120 days and includes the following:

- a. Current rent receipts, leases, utility bills, employer or agency records, school records, driver's licenses, voter registration records, credit reports, and statements from a household where the family resides. At the LACDA's discretion, verification of residency may also include other documents, certifications, or declarations as needed to verify that a family lives or works in the jurisdiction;
- b. Utility bill includes cellular phones or internet or any utility service contract, statement, or payment receipts; financial statements, including credit card bills or bank statements;
- c. Mail received at residency address (must be verified with U.S. Postal Service certification);
- d. Employer records, including documentation such as paystubs or communications;
- e. Documentation or a written statement from a faith-based organization;
- f. Documentation or a written statement from a social service organization;
- g. Documentation or a written statement from a housing/transitional shelter or any housing assistance servicing agency;
- h. Internal Revenue Service (IRS) or California Franchise Board (FTB) return;
- i. Any document issued by an entity, office, or authority governing over a country, state, county, city, municipality, district, agency, department, or any other political subdivision of a country or state that is typed and contains the agency name, department name, state seal, or is on official letterhead;
- j. DMV vehicle registration; and/or,
- k. Valid State-issued identification.

For purposes of this section, a credit report or a statement from a financial institution, such as a bank, cannot be used by themselves to demonstrate or deny eligibility for the Residency Preference. A credit report and/or statement from a financial institution may be used with other items on this list to verify residency.

## **17. Record Keeping**

Currently, the LACDA maintains a written record of every termination and/or eviction in accordance with its record retention policy.

Effective July 1, 2025, the LACDA shall retain files of all applicants denied the Homeless Families Preference or the Residency Preference. These files must include the applicant's initial registration, final application, results of any informal hearings, and all documentation submitted to the LACDA. This documentation should also detail the reason for denial and include any materials used in this determination.

The LACDA shall submit these files to the HUD annually upon request. Within 30 days of receipt of these files, HUD will inform the LACDA of any dispute with the determination, along with an explanation of the dispute. If HUD makes a final determination that an applicant was wrongfully denied, the LACDA agrees to reinstate the applicant to "Active"

on the waiting list with the original application date and time and preferences claimed, and/or offer the applicant housing. If the LACDA does not agree with HUD's determination, the LACDA agrees to provide HUD an explanation for their reasoning in writing within 30 days.

At HUD's discretion, HUD may request a meeting with the LACDA to discuss the disagreement for a final resolution.

---

### **Administrative Plan Proposed Policies**

Below are the major policy changes for programs under the Housing Assistance Division. This upcoming year, the LACDA will present changes with two effective dates: 1) Changes that are mandated to be in the Administrative Plan no later than June 6, 2025, by the additional streamlining Housing Opportunity Through Modernization Act of 2016 (HOTMA) changes released via a federal register on May 7, 2024; and 2) the LACDA's adopted policies for FY 2025-2026 effective July 1, 2025.

Effective **June 1, 2025**, the following changes will be incorporated into the LACDA's Administrative Plan to comply with HOTMA's mandated implementation date:

#### **Housing Choice Voucher (HCV) Program**

##### **1. Information When a Family is Selected – Voucher Issuance**

Currently, language access flyers are specific to tenant annual recertification packets.

Effective June 1, 2025, to meet HUD's requirements and address recommendations from community organizations, the LACDA will provide a Babel notice to families when they receive a voucher, request a reasonable accommodation, or during the application and recertification processes. This notice will inform families about available language access resources. Furthermore, information about language access will be accessible on the LACDA's website.

##### **2. Manufactured Home Space Rentals – HAP Calculation**

Currently, the LACDA does not specify how HAP is calculated for families who own a manufactured home and lease the space in its Administrative Plan.

Effective June 1, 2025, in accordance with HUD guidelines, the LACDA will revise its Administrative Plan to include language addressing the following:

1. **Housing Assistance Payment:** The HAP for a manufactured home space under the HCV Program will be the lower of the payment standard minus the Total Tenant Payment (TTP) *or* the family's eligible housing expenses minus the TTP.
2. **Eligible Housing Expenses:** A family's eligible housing expense will be the total of:
  - a. The rent charged by the owner for the manufactured home space.
  - b. Charges for maintenance and management of the space.
  - c. The monthly payments made by the family to amortize the cost of purchasing the manufactured home established at the time of application to a lender for financing the purchase of the manufactured home if monthly payments are still

being made, including any required insurance and property taxes included in the loan payment to the lender.

The amortization cost does not include increases in debt service or changes to the loan term due to refinancing after a home purchase. Debt service from installation charges may be included in monthly payments. If payments are ongoing, installation charges incurred before a family receives assistance can also be part of the amortization cost.

- 3. Distribution of HAP:** If the LACDA's HAP exceeds the portion of the monthly rent due to the owner, the LACDA will pay the balance of the HAP to the family.

### **3. Definition of Inspection Types – Extraordinary Circumstances**

Currently, the LACDA does not have language in the Administrative Plan relating to inspections during extraordinary circumstances.

Effective June 1, 2025, in accordance with HUD, the LACDA will revise its current policy to state that in extraordinary circumstances, such as when a unit is located in a presidentially declared disaster area, HUD may grant an exception to the 24-hour inspection requirement for life-threatening deficiencies and the 15-day inspection requirement for non-life-threatening deficiencies until an inspection can be conducted.

### **4. Tenant Relocation due to HQS Abatement**

Currently, when a family receives a voucher due to an owner's failure to correct HQS deficiencies, they are given a 60-day voucher term and an automatic 60-day extension. The LACDA does not offer the family a selection preference for Public Housing if the family is unable to locate a unit within the voucher term.

Effective June 1, 2025, to comply with HUD requirements, the LACDA will modify its Administrative Plan to state that if a family's HAP contract is terminated due to the owner's failure to address HQS deficiencies, resulting in a unit abatement, the family will receive a 90-day voucher term with an automatic 90-day extension. The LACDA will continue its regular extension policy beyond the initial 180 days granted to the family, except that any extension granted will be for a minimum of 90 days. If the family is unable to lease a new unit within this time, the LACDA will offer the family a preference for an appropriate Public Housing unit that first becomes available after the voucher period expires.

### **5. HAP Contract Execution – Extenuating Circumstances**

Currently, the LACDA may not execute a HAP contract more than 60 calendar days after the commencement of the lease term, and no payments will be made until the contract is executed.

HUD has provided clarification regarding the execution of the HAP contract. Effective June 1, 2025, the LACDA will update its Administrative Plan to indicate that in extenuating circumstances that prevent or prevented the LACDA from meeting the 60-day HAP contract execution deadline, the LACDA may submit a request for an extension to the HUD field office. The request must be submitted no later than two weeks after the 60-day deadline and include an explanation of the extenuating circumstances and any supporting documentation. HUD will determine if the extension request is approved at its sole discretion.

## **6. “Household” Members**

Currently, the LACDA’s Administrative Plan states the requirements for including a foster child, foster adult, or live-in aide are authorized as part of the family’s household composition. However, it does not indicate the rules for continued occupancy for foster children and foster adult(s) who exit the foster care system.

Effective June 1, 2025, the LACDA will update its Administrative Plan to comply with HUD’s mandate. This update will establish a process for following up with families that have a foster household member who has turned age 18 and continues to live in the home. In these situations, the LACDA will contact the family to determine whether the foster member is still under legal guardianship or custody of the state or county. If the member remains under such guardianship or custody and provides proper verification, they will continue to be classified as a foster household member within the LACDA’s system. However, if it is determined that the member is no longer under legal guardianship or custody, the family will have the option to reclassify the member from a foster household member to a family member. Should the family choose to make this change, all program rules and regulations will apply to the entire family.

## **7. HAP Termination Due to Insufficient Funding**

Currently, the LACDA will consider program funding insufficient if it is determined that the projected year-end subsidy falls short of the authorized budget amount. In these circumstances, proper documentation must be completed before making the decision to terminate HAP contracts due to insufficient funding. If necessary, the LACDA will determine how many families need contract termination and present a plan of action to the Board of Commissioners. After notifying the Board and HUD, the LACDA will terminate contracts, except those related to elderly and disabled families. Terminated families will be placed on the waiting list with a preference for future assistance.

Effective June 1, 2025, to align with the HUD mandate, the LACDA will update its Administrative Plan to enhance the factors considered when terminating HAP contracts due to insufficient funding. In addition to exempting elderly and disabled families, the LACDA will evaluate the administrative costs associated with housing a family, the length of a family’s program participation, and a family’s overall good standing within the program.

## **Project-Based Voucher (PBV) Program**

### **1. Definitions**

Currently, the PBV chapter of the Administrative Plan does not contain definitions specific to PBV.

Effective June 1, 2025, to comply with HUD’s requirement, the LACDA will include a definition of "Project" in its Administrative Plan. A "Project" is defined as a single building, multiple contiguous buildings, or multiple buildings on contiguous parcels of land. “Contiguous” in this definition includes “adjacent to,” as well as touching along a boundary or a point. “Building” is defined as a structure with a roof and walls that contains one or more dwelling units.

### **2. Eligible Housing for PBV Assistance**

Currently, a single-family building is not identified as being eligible for PBV assistance.

Effective June 1, 2025, to be consistent with HUD's expanded list of eligible projects, the Administrative Plan will be revised to indicate that PBV assistance may be a multifamily building or single-family building, provided that all projects are of the same housing type (existing, rehabilitated, or newly constructed).

### **3. Impact Analysis**

Currently, an impact analysis is not required.

Effective June 1, 2025, to comply with HUD's requirement, the Administrative Plan will be updated to state that if units under the cap plus units exempt from the cap exceed 50% of the total baseline, an analysis must be completed before selecting a project for PBV assistance. The analysis should consider the ability of the LACDA to meet the needs of the community across its tenant-based and project-based voucher portfolio, including the impact on, among others, families on the waiting list and eligible PBV families that wish to move after their 1 year of PBV tenancy.

The analysis performed by the PHA must be available as part of the public record.

Additionally, the requirement of notifying the HUD field office before a Request for Proposal (RFP) was issued or a selection was made without issuing an RFP, has been removed. However, HUD must be notified when a HAP contract is executed, amended, or extended.

### **4. Units Subject to the Percentage Limitation**

All PBV units which the LACDA has selected (from the time of the proposal or project selection date) or which are under an Agreement or HAP contract for PBV assistance count toward the 20 percent maximum or increased cap, as applicable, except units that are excluded from the program or project cap.

### **5. Increase Program Cap**

Currently, the program cap is up to 20 percent of the amount of budget authority allocated to the LACDA by HUD in the voucher program. An additional 10 percent, (as adjusted for units excluded from the program cap) of the LACDA's vouchers may be project-based if the units are specifically made to house individuals or families that meet the definition of homeless, units are specially made available to families that include a veteran, units that provide supportive housing to persons with disabilities or to elderly persons, and/or units located in a census tract with a poverty rate of 20 percent or more.

These units must have been part of a HAP contract executed on or after April 18, 2017, or added on or after that date to any current HAP contract, including a contract entered prior to April 18, 2017.

Effective June 1, 2025, to be consistent with HUD's updated regulation, the Administrative Plan will be updated to indicate that units that are exclusively made available to eligible youth also qualify for the higher program cap. Units that are exclusively made to serve eligible youth must be part of a HAP contract executed on or after December 27, 2020, or the units must have been added on or after that date to an existing HAP Contract, including a contract entered into prior to December 27, 2020.

Additionally, the Administrative Plan will be updated to replace the statement that if a project is located *in a census tract with a poverty rate of 20 percent or more* with a project that is located in an *area where vouchers are difficult to use*, count towards the additional 10 percent program cap. An *area where vouchers are difficult* is defined as:

1. A census tract with a poverty rate of 20 percent or less, as determined by HUD;
2. A ZIP code area where the rental vacancy rate is less than 4 percent, as determined by HUD or
3. A ZIP code area where 90 percent of the Small Area FMR is more than 110 percent of the metropolitan area or county FMR

The provisions that units made specifically to house individuals or families that meet the definition of homeless, units that are specially made available to families that include a veteran, and/or units that provide supportive housing to persons with disabilities or elderly persons remain unchanged.

## **6. Higher Project Cap**

Currently, the project cap is 25 percent of the total number of dwelling units (assisted or unassisted) in the project. Assistance may be provided to the greater of 25 units or 40 percent of the number of dwelling units (assisted or unassisted, as adjusted by exceptions to the project cap) if the project is located in a census tract with a poverty rate of 20 percent or more.

Effective June 1, 2025, to be consistent with HUD's updated regulation, the Administrative Plan will be updated to replace the statement that if a project is located *in a census tract with a poverty rate of 20 percent or more* with a project that is located in an *area where vouchers are difficult to use*. An *area where vouchers are difficult* is defined as:

1. A census tract with a poverty rate of 20 percent or less, as determined by HUD;
2. A ZIP code area where the rental vacancy rate is less than 4 percent, as determined by HUD or
3. A ZIP code area where 90 percent of the Small Area FMR is more than 110 percent of the metropolitan area or county FMR

## **7. Exceptions to the Project Cap**

Currently, units exclusively made available for elderly families or units for households eligible for supportive services do not count towards the project cap.

Effective June 1, 2025, to be consistent with HUD's updated regulation, the Administrative Plan will be updated to state that units exclusively made available to eligible youth will also not count towards the project cap.

HAP contracts in effect prior to December 27, 2020, when the exception of units made available to eligible youth came into effect, are governed by those HAP contracts' terms concerning the number and type of excepted units in a project. The owner must continue to designate the same number of contract units and assist the same number and type of excepted units as provided under the HAP contract during the remaining term of the HAP contract and any extension.

The owner and the LACDA may mutually agree to change the requirements for excepted units under the HAP contract to comply with the new and revised excepted unit requirements, however, any change to the HAP contract may only be made if the change does not jeopardize an assisted family's eligibility for continued assistance at the project.

The provisions that units that are exclusively available for elderly families or units for households eligible for supportive services continue to be excluded from the project cap.

Units excluded from program cap are also excluded from the project cap.

## **8. Units Excluded from the Program Cap**

Currently, PBV units under the RAD program, HUD-VASH PBV set-aside vouchers, and units subject to certain federal rent restrictions or were receiving another type of long-term housing subsidy provided by HUD do not count towards the program cap.

Effective June 1, 2025, to be consistent with HUD's updated regulation, the Administrative Plan will be updated to expand that units that are being rehabilitated or built to replace existing units already excluded from the program or project cap will continue to be excluded.

Additionally, units that previously qualified for the Low-Income Housing Tax Credit program are now considered as units that have had federally required rent restrictions and, therefore, also excluded from the program cap.

The new exclusion may only be made available to HAP contracts entered into on or after April 18, 2017.

## **9. Project Record Retention**

Currently, HUD does not have a project record retention policy.

Effective June 1, 2025, to be consistent with HUD's updated regulation, the Administrative Plan will be updated to specify the LACDA must maintain the following records throughout the HAP contract term and for three years thereafter:

1. Records to document the basis for PHA selection of the proposal, if the selection is competitive, or project, if the selection is noncompetitive, including records of the PHA's site selection determination and records to document the completion of the review of the selection process in the case of PHA-owned units and copies of the written notice of proposal selection and the response of the appropriate party;
2. The analysis of impact, if applicable;
3. The subsidy layering determination, if applicable;
4. The environmental review record, if applicable;
5. The Agreement to enter into a HAP contract, if applicable;
6. Evidence of completion, if applicable;
7. The HAP contract and any rider and/or amendments, including amendments to extend the term of the contract;
8. Records to document the basis for PHA determination and redetermination of rent to owner;
9. Records to document HUD approval of the independent entity or entities, in the case of PHA-owned units;
10. Records of the accessibility features of the project and each contract unit; and
11. Other records as HUD may require.

## **10. Environmental Review**

Currently, all selected projects require an environmental review.

Effective June 1, 2025, to be consistent with HUD's updated regulation, the Administrative Plan will be updated to specify that for existing housing, proposals selected in accordance with the site selection standards in effect on or after June 6, 2024, no environmental review is required before entering into a HAP contract, except to the extent a Federal environmental review is required by law or regulation relating to funding other than PBV housing assistance payments.

## **11. Term of the HAP Contract**

Currently, the HAP contract may only be extended within 24 months of its expiration date.

Effective June 1, 2025, to be consistent with HUD's updated regulation, the Administrative Plan will be updated to specify the PBV HAP contract may be extended at any time during its life. However, the maximum term of the contract may not be more than 40 years.

## **12. PBV HAP Contract Termination or Expiration**

Currently, the LACDA is not required to specify in the Administrative Plan that a tenant-based voucher had to be issued to families residing in a project where the owner terminated the HAP contract or declined to renew the HAP contract.

Effective June 1, 2025, to be consistent with HUD's updated regulation, the Administrative Plan will be updated to specify that unless a termination or expiration without extension occurs due to insufficient funding or other extraordinary circumstances determined by HUD, the LACDA shall issue a tenant-based voucher to each family occupying a contract unit.

## **13. Family Rejection of the Unit or Owner Rejection of the Family**

Currently, the Administrative Plan allows for removing the family from the site-based waiting list if the family rejects the unit or the owner denies the family.

Effective June 1, 2025, to be consistent with HUD's updated regulation, the Administrative Plan will be updated to specify this requirement is now a must unless the family has good cause.

Good cause is defined as:

1. The family determines the unit is not accessible to a household member with a disability or otherwise does not meet the member's disability-related needs.
2. The unit has HQS deficiencies.
3. The family is unable to accept the offer due to circumstances beyond its control (e.g., hospitalization, temporary economic hardship, or natural disaster).
4. The family determines whether the unit presents a health or safety risk to a household member who is or has been a victim of domestic violence, dating violence, sexual assault, or stalking.



Effective **July 1, 2025**, the following changes are incorporated into the LACDA's Administrative Plan:

### **1. Homeless Preference**

Currently, the LACDA, under its homeless preference, commits 100% of expected annual voucher attrition to assist Los Angeles County-based homeless persons and families.

To qualify for the program, homeless individuals and families must be referred through the Continuum of Care (CoC), Coordinated Entry System (CES), or partner agencies contracted with the LACDA. These partner agencies must participate in homeless initiatives and may include those providing transitional or permanent supportive housing. The referring agency must verify the homeless status of those referred. Families already on the waiting list who claim homelessness but lack a referral must obtain certification from a CoC CES or a partner agency. The number of families eligible for this preference will be determined annually by the LACDA. Admission is on a first-come, first-served basis and subject to funding availability.

Moving forward, the LACDA will commit 50% of the expected annual voucher attrition to assist Los Angeles County-based homeless persons and families. The qualification criteria under the LACDA's homeless preference remain unchanged. The change in voucher attrition commitment to homeless persons and families will allow the LACDA to assist other vulnerable populations needing housing through its waiting list.

### **2. Violence Against Women Act (VAWA)**

Currently, the LACDA's Administrative Plan states that form HUD-5380, titled "Notice of Occupancy Rights Under VAWA," and form HUD-5380, titled "Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation," must be provided when a family is denied housing assistance and admission, specifically when applicants are briefed for a voucher.

Moving forward, the LACDA will add clarifying language in its Administrative Plan stating that families will receive HUD-required VAWA forms when they are denied admission and when they are admitted to the program, specifically when a family is leased up, and the HAP contract has been established with the owner, as well as when adult members are added to the program after the family has been admitted.

### **3. Letter of Authorization for HAP Contract Execution**

Currently, the LACDA's Administrative Plan states that once the agency has received the appropriate authorization to enter a HAP contract with an owner, this letter of authorization will remain in effect until it is replaced by another authorization or until the HAP contract is terminated.

Moving forward, the LACDA will update the language in its Administrative Plan to clarify that once proper authorization has been obtained to enter a HAP contract with an owner, the letter of authorization will remain valid for the specified unit or building as detailed in the letter. This authorization will continue until it is terminated by the owner or replaced by a different authorization.

#### **4. Voucher Issuance**

Currently, the LACDA's Administrative Plan allows families to request a waiver to rent a unit with fewer bedrooms than their voucher size, provided that the unit does not exceed the maximum occupancy requirements.

Moving forward, the LACDA will update its Administrative Plan to clarify that families are not required to request a waiver to lease an otherwise acceptable unit that complies with the maximum occupancy requirements.

The Administrative Plan and ACOP include additional language changes that are statutory, regulatory, and/or clarify existing policy.