



10400 Detrick Avenue  
 Kensington, MD 20895-2484  
 (240) 627-9425



## **ADMINISTRATIVE AND REGULATORY COMMITTEE**

**June 25, 2024**  
**4:00 p.m.**

Livestream: <https://youtube.com/live/CfthpuhnhBs?feature=share>

**The public is invited to attend HOC's June 25, 2024 Administrative and Regulatory Committee meeting in-person. HOC's Board of Commissioners and staff will continue to participate through a hybrid model (a combination of in-person online participation).**

### **Approval of Minutes:**

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### **Action Items:**

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# Minutes

**HOUSING OPPORTUNITIES COMMISSION OF MONTGOMERY COUNTY**

10400 Detrick Avenue  
Kensington, Maryland 20895  
(240) 627-9425

**Administrative and Regulatory Committee Minutes**

May 20, 2024

For the official record of the Housing Opportunities Commission of Montgomery County, an open meeting of the Administrative and Regulatory Committee was conducted via a hybrid platform (a combination of in-person and online platform/teleconference) on Monday, May 20, 2024 with moderator functions occurring at 10400 Detrick Avenue, Kensington, Maryland beginning at 4:10 p.m. There was a livestream of the meeting held on YouTube, available for viewing [here](#). Those in attendance were:

**Present**

Frances Kelleher, Chair

**Attending Via Zoom**

Linda Croom, Commissioner

Pamela Byrd, Commissioner

**Also Attending**

Chelsea Andrews, President/Exe. Director Aisha Memon, General Counsel

Kayrine Brown Zachary Marks

Darcel Cox Elliot Rule

Ken Silverman

**Also Attending Via Zoom**

Lynn Hayes

**IT Support**

Irma Rodriguez

Richard Congo

Aries Cruz

David Brody

Genio Etienne

**Commission Support**

Morgan Tucker

Imani Benjamin-Johnson

Committee Chair Kelleher formally opened the Administrative and Regulatory Committee meeting at 4:10pm and began with the approval of the minutes.

**Approval of Minutes**

The minutes of the April 15, 2024 Administrative and Regulatory Committee meeting were approved as submitted with a motion from Commissioner Croom and seconded by Commissioner Byrd. Affirmative votes were cast by Commissioners Kelleher, Byrd and Croom.

**Discussion/Action Items**

**1. Waitlist Process Recommendation**

Committee Chair Kelleher introduced President Andrews to provide a brief overview of the presentation. President Andrews introduced Darcel Cox, Vice President, Compliance, who provided a detailed presentation. Ms. Cox shared updates with the committee and, with President Andrews, answered questions regarding waitlist data cleanup and whether the waitlist should remain open or closed during the data cleanup.

HOC staff recommended following guidance received from outside consultant, Du and Associates, to wait until Fall '24 to bring this item before the full Commission to determine any changes to HOC's waitlist management practices.

Committee Chair Kelleher adjourned the meeting at 5:10pm.

Respectfully submitted,

Chelsea Andrews,  
Secretary-Treasurer

/ibj

**MEMORANDUM**

**TO:** Housing Opportunities Commission of Montgomery County  
Administrative and Regulatory Committee

**VIA:** Chelsea J. Andrews, President

**FROM:** Staff: Darcel Cox, Vice President/Compliance  
Neron Adams-Escalera, Management and Compliance Analyst  
Elliot Rule, Management and Compliance Analyst

**RE:** Authorization to Submit HOC’s Fiscal Year 2024 Section Eight Management Assessment Program (“**SEMAP**”) Certification to HUD

**DATE:** June 25, 2024

**STATUS:** Consent \_\_\_\_ Deliberation  X  Status Report \_\_\_\_ Future Action \_\_\_\_

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**OVERALL GOAL & OBJECTIVE:**

To authorize the President of the Housing Opportunities Commission of Montgomery County (“**HOC**” or the “**Commission**”), or their designee, to submit HOC’s Fiscal Year (“**FY**”) 2024 Section Eight Management Assessment Program certification to the U.S. Department of Housing and Urban Development (“**HUD**”).

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**BACKGROUND:**

SEMAP is designed to measure whether the Section Eight tenant-based programs operate to help eligible families afford decent rental units at the correct subsidy cost. SEMAP also establishes an objective system for HUD to measure the Public Housing Authority’s (“**PHA**”) performance in key Section Eight program areas so as to enable program integrity and accountability.

HUD published a Final Rule in the Federal Register on June 20, 2000. This rule mandates that the PHA administering the Section Eight Tenant-Based Rental Assistance program must submit the HUD Form 52648, SEMAP Certification, to HUD annually. The certification, which measures the status of HOC’s administration of the Section Eight program for the prior fiscal year, is submitted to HUD annually within 60 days after the end of the given fiscal year. For HOC, this date is August 29, 2024. Once approved, the contents of the attached HUD Form 52648 and corresponding indicator scores are transmitted electronically using HUD’s Public and Indian Housing Certification (“**PIC**”) system.

This SEMAP certification includes HOC’s assessment of program administration in 14 areas. The HOC Compliance Division performs quality control reviews (“**QCs**”) for all areas.

The chart below identifies the individual indicator areas, the maximum points possible, the points HOC received for FY 2023, and what HOC will certify in its FY 2024 submission.

Indicator	Indicator Title	Maximum Possible Points	2023 Rating	2024 Certification
1	Wait List Selection	15	15	15
2	Reasonable Rent	20	15	15
3	Determination of Adjusted Income	20	20	15
4	Utility Allowance	5	5	5
5	HQS Quality Control	5	5	5
6	HQS Enforcement	10	0	0
7	Expanding Housing Opportunities	5	5	5
8	Payment Standards	5	5	5
9	Timely Annual Recertification	10	10	10
10	Correct Tenant Rent	5	5	5
11	Pre-Contract HQS Inspection	5	5	5
12	Annual HQS Inspection	10	10	10
13	Lease Up	20	20	20
14	Family Self-Sufficiency (FSS)	10	10	8
	Program Points	145	130	123
Bonus	Deconcentration Bonus	5	5	5
	Total Points	-	<b>135</b>	<b>128</b>
	Overall Percentage	-	<b>93%</b>	<b>88%</b>

There are three possible categories for the final SEMAP score and overall performance rating as described at 24 CFR 985.103. They are as follows:

1. **High Performer Rating:** PHAs with a SEMAP score of at least 90 percent are rated high performers. High performers may receive national recognition by HUD and may be given competitive advantage under HUD Notices of Fund Availability (“**NOFA**”).
2. **Standard Rating:** PHAs with a SEMAP score of 60-89 percent are rated standard.
3. **Troubled Rating:** PHAs with a SEMAP score of less than 60 percent are rated troubled.

HOC’s FY 2024 SEMAP Certification submission equals **128** points, or **88%** percent of the overall total program points. HOC’s program profile status is **Standard**. HOC’s score decreased by Seven (**7**) points from the FY 2023 submission.

### Discussion:

The indicators outlined below received partial or zero points:

#### Indicator Two: Reasonable Rent (15 out of 20 points)

- **Explanation:** Quality control reviews related to determination of reasonable rent for customers moving to new units and owners of current customers requesting annual rent

increases resulted in an 86% pass rate. However, the SEMAP standard for receiving full points is 98% or higher, or 80% to 97% for partial points.

- **Corrective Action:** The Housing Resources Division's ("HRD") management team along with the Compliance Team will continue to conduct quality control reviews for rent reasonableness. Thereafter, staff will meet quarterly to discuss systemic findings and schedule staff trainings in areas requiring improvement.

The Compliance Division will continue to place an emphasis on conducting quality control reviews for actions related to rent reasonableness determination. These actions include initial rent reasonableness processing when customers first move into a unit, as well as annual rent increase requests submitted by current owners. Compliance will meet with HRD after all QC review periods to discuss any deficiencies discovered, and to provide training recommendations.

#### Indicator Three: Adjusted Income (15 out of 20 points)

- **Explanation:** The QC reviews for factors related to adjusted income resulted in an 83% pass rate. However, the SEMAP standard for receiving full points is 90%, and 80 to 89% for partial points. The QCs identified issues related to Assets, Income, and Deduction Verification and Calculation.
- **Corrective Action:** HOC will obtain additional training from an external consultant to provide training on the determination of adjusted income. The current requirements to calculate income will vastly change, once the Housing Opportunities Through Modernization Act ("HOTMA") regulations are enacted on January 1, 2025. The final rule streamlines the verification of income and assets, which may result in fewer errors. Moreover, HOTMA allows PHAs to use income determinations made under other federal benefits programs for annual reexaminations.

The Compliance Division will continue to place an emphasis on conducting quality control reviews for actions related to the determination of adjusted income, specifically, Initial Certification and Annual Reexamination files. Compliance will continue to meet with HRD after all QC review periods to discuss any deficiencies discovered, and to provide training recommendations.

#### Indicator Six: HQS Enforcement (Zero (0) out of 10 points)

- **Explanation:** The QC reviews for HQS Enforcement resulted in a 70% pass rate. However, a pass rate of 98% or higher is required to receive points for this indicator. QC reviews of HQS-related QCs revealed issues with units not being re-inspected within 30 days for non-emergency items. Additionally, QC reviews indicated issues with the processing of Abatements for Housing Assistance Payments after a second failed inspection.

- **Corrective Action:** HOC procured Gilson Housing Partners to conduct HQS inspections in October 2023. The transition from the former inspection company to the new company resulted in the inheritance of a copious backlog of inspections. Gilson Housing Partners inherited annual inspections, re-inspections, and missed inspections in the first month of employment, that was not anticipated. As a result, some of the re-inspections were not processed timely. Gilson hired additional inspectors to reduce the backlog and bring the accounts current. Monthly, the HOC Inspection Services Team generates a report of delinquent inspections to identify any unit that requires an immediate inspection. Additionally, the inspection Services Team meets with Gilson weekly to discuss and improve program operations.

The Compliance Division will continue to place an emphasis on conducting quality control reviews for actions related to HQS enforcement, specifically for failed inspections, re-inspections, and abatements. Compliance will meet with HRD after all QC review periods to discuss any deficiencies discovered, and to provide training recommendations.

Indicator Fourteen: Family Self Sufficiency (Eight (8) out of Ten points (10))

- **Explanation:** HOC's FSS score experienced a decrease in mandatory slot utilization from 81.4% to 74.6%. HOC currently has 441 mandatory slots under its FSS program. HOC's current rate of families with escrow balances remains high at 78%. The threshold for full points for this indicator is 80% of mandatory slots filled and 30% or more families with escrow balances.
- **Corrective Action:** FSS resident counselors will continue to solicit available participants directly and participate in the assorted customer briefings conducted on an ongoing basis. Each counselor will be responsible for marketing the program by phone, email, and in-person to at least 25 customers per month.

Additionally, FSS will deepen engagement with community partners by directly contacting HOC customers. Marketing materials for the program will be provided to property managers where customers live. Marketing materials will also be updated on community message boards, both electronic and physical. FSS staff intend to participate actively in community events where customers live.

HOC has been consistently rated as a High Performer under the SEMAP program and continues to work diligently to improve the accuracy of all HCV program activities. Specific attention is placed on quality control reviews for the items outlined above, specifically, inspection related items, adjusted income calculation and verification, and rent reasonableness activity.

Federal regulations require HUD to issue its final ratings to HOC within 120 days of HOC's Fiscal Year end. The notification letter from HUD will require HOC to respond within 45 days if there are any corrective actions for any SEMAP deficiencies. HOC staff will promptly address and correct any issues that HUD identifies.



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**ISSUES FOR CONSIDERATION:**

Does the Administrative and Regulatory Committee wish to join staff's recommendation to the Commission to authorize the President, or her designee, to submit the FY 2024 SEMAP Certification to HUD on or before August 29, 2024?

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**TIME FRAME:**

For discussion by the Administrative and Regulatory Committee at its meeting on June 25, 2024.  
For formal Commission action on July 10, 2024.

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**STAFF RECOMMENDATION & COMMISSION ACTION NEEDED:**

Staff recommends that the Administrative and Regulatory Committee join staff's recommendation to the Commission to authorize the President, or her designee, to submit the FY 2024 SEMAP Certification to HUD on or before August 29, 2024.

# Section 8 Management Assessment Program (SEMAP) Certification

U.S. Department of Housing  
and Urban Development  
Office of Public and Indian Housing

OMB Approval No. 2577-0215  
(exp. 12/31/2026)

Public reporting burden for this collection of information is estimated to average 12 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and you are not required to respond to, a collection of information unless it displays a currently valid OMB control number.

This collection of information is required by 24 CFR sec 985.101 which requires a Public Housing Agency (PHA) administering a Section 8 tenant-based assistance program to submit an annual SEMAP Certification within 60 days after the end of its fiscal year. The information from the PHA concerns the performance of the PHA and provides assurance that there is no evidence of seriously deficient performance. HUD uses the information and other data to assess PHA management capabilities and deficiencies, and to assign an overall performance rating to the PHA. Responses are mandatory and the information collected does not lend itself to confidentiality.

**Instructions** Respond to this certification form using the PHA's actual data for the fiscal year just ended.

PHA Name <b>Housing Opportunities Commission</b>	For PHA FY Ending (mm/dd/yyyy) <b>06/30/2024</b>	Submission Date (mm/dd/yyyy)
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**Check here if the PHA expends less than \$300,000 a year in Federal awards**

Indicators 1 - 7 will not be rated if the PHA expends less than \$300,000 a year in Federal awards and its Section 8 programs are not audited for compliance with regulations by an independent auditor. A PHA that expends less than \$300,000 in Federal awards in a year must still complete the certification for these indicators.

## Performance Indicators

1. Selection from the Waiting List. (24 CFR 982.54(d)(1) and 982.204(a))

(a) The PHA has written policies in its administrative plan for selecting applicants from the waiting list.

PHA Response Yes  No

(b) The PHA's quality control samples of applicants reaching the top of the waiting list and of admissions show that at least 98% of the families in the samples were selected from the waiting list for admission in accordance with the PHA's policies and met the selection criteria that determined their places on the waiting list and their order of selection.

PHA Response Yes  No

2. Reasonable Rent. (24 CFR 982.4, 982.54(d)(15), 982.158(f)(7) and 982.507)

(a) The PHA has and implements a reasonable written method to determine and document for each unit leased that the rent to owner is reasonable based on current rents for comparable unassisted units (i) at the time of initial leasing, (ii) before any increase in the rent to owner, and (iii) at the HAP contract anniversary if there is a 5 percent decrease in the published FMR in effect 60 days before the HAP contract anniversary. The PHA's method takes into consideration the location, size, type, quality, and age of the program unit and of similar unassisted units, and any amenities, housing services, maintenance or utilities provided by the owners.

PHA Response Yes  No

(b) The PHA's quality control sample of tenant files for which a determination of reasonable rent was required shows that the PHA followed its written method to determine reasonable rent and documented its determination that the rent to owner is reasonable as required for (check one):

PHA Response  At least 98% of units sampled  80 to 97% of units sampled  Less than 80% of units sampled

3. Determination of Adjusted Income. (24 CFR part 5, subpart F and 24 CFR 982.516)

The PHA's quality control sample of tenant files shows that at the time of admission and reexamination, the PHA properly obtained third party verification of adjusted income or documented why third party verification was not available; used the verified information in determining adjusted income; properly attributed allowances for expenses; and, where the family is responsible for utilities under the lease, the PHA used the appropriate utility allowances for the unit leased in determining the gross rent for (check one):

PHA Response  At least 90% of files sampled  80 to 89% of files sampled  Less than 80% of files sampled

4. Utility Allowance Schedule. (24 CFR 982.517)

The PHA maintains an up-to-date utility allowance schedule. The PHA reviewed utility rate data that it obtained within the last 12 months, and adjusted its utility allowance schedule if there has been a change of 10% or more in a utility rate since the last time the utility allowance schedule was revised.

PHA Response Yes  No

5. HQS Quality Control Inspections. (24 CFR 982.405(b))

A PHA supervisor (or other qualified person) reinspected a sample of units during the PHA fiscal year, which met the minimum sample size required by HUD (see 24 CFR 985.2), for quality control of HQS inspections. The PHA supervisor's reinspected sample was drawn from recently completed HQS inspections and represents a cross section of neighborhoods and the work of a cross section of inspectors.

PHA Response Yes  No

6. HQS Enforcement. (24 CFR 982.404)

The PHA's quality control sample of case files with failed HQS inspections shows that, for all cases sampled, any cited life-threatening HQS deficiencies were corrected within 24 hours from the inspection and, all other cited HQS deficiencies were corrected within no more than 30 calendar days from the inspection or any PHA-approved extension, or, if HQS deficiencies were not corrected within the required time frame, the PHA stopped housing assistance payments beginning no later than the first of the month following the correction period, or took prompt and vigorous action to enforce the family obligations for (check one):

PHA Response  At least 98% of cases sampled  Less than 98% of cases sampled

7. Expanding Housing Opportunities. (24 CFR 982.54(d)(5), 982.153(b)(3) and (b)(4), 982.301(a) and 983.301(b)(4) and (b)(12)).

**Applies only to PHAs with jurisdiction in metropolitan FMR areas.**

**Check here if not applicable**

(a) The PHA has a written policy to encourage participation by owners of units outside areas of poverty or minority concentration which clearly delineates areas in its jurisdiction that the PHA considers areas of poverty or minority concentration, and which includes actions the PHA will take to encourage owner participation.

**PHA Response** Yes  No

(b) The PHA has documentation that shows that it took actions indicated in its written policy to encourage participation by owners outside areas of poverty and minority concentration.

**PHA Response** Yes  No

(c) The PHA has prepared maps that show various areas, both within and neighboring its jurisdiction, with housing opportunities outside areas of poverty and minority concentration; the PHA has assembled information about job opportunities, schools and services in these areas; and the PHA uses the maps and related information when briefing voucher holders.

**PHA Response** Yes  No

(d) The PHA's information packet for voucher holders contains either a list of owners who are willing to lease, or properties available for lease, under the voucher program, or a list of other organizations that will help families find units and the list includes properties or organizations that operate outside areas of poverty or minority concentration.

**PHA Response** Yes  No

(e) The PHA's information packet includes an explanation of how portability works and includes a list of neighboring PHAs with the name, address and telephone number of a portability contact person at each.

**PHA Response** Yes  No

(f) The PHA has analyzed whether voucher holders have experienced difficulties in finding housing outside areas of poverty or minority concentration and, where such difficulties were found, the PHA has considered whether it is appropriate to seek approval of exception payment standard amounts in any part of its jurisdiction and has sought HUD approval when necessary.

**PHA Response** Yes  No

8. Payment Standards. The PHA has adopted payment standards schedule(s) in accordance with § 982.503.

**PHA Response** Yes  No

Enter FMRs and payment standards (PS)

**See attached Small Area Payment Standards.**

0-BR FMR \_\_\_\_\_ 1-BR FMR \_\_\_\_\_ 2-BR FMR \_\_\_\_\_ 3-BR FMR \_\_\_\_\_ 4-BR FMR \_\_\_\_\_  
PS \_\_\_\_\_ PS \_\_\_\_\_ PS \_\_\_\_\_ PS \_\_\_\_\_ PS \_\_\_\_\_

**If the PHA has jurisdiction in more than one FMR area, and/or if the PHA has established separate payment standards for a PHA-designated part of an FMR area, attach similar FMR and payment standard comparisons for each FMR area and designated area.**

9. Annual Reexaminations. The PHA completes a reexamination for each participating family at least every 12 months. (24 CFR 982.516)

**PHA Response** Yes  No

10. Correct Tenant Rent Calculations. The PHA correctly calculates tenant rent in the rental certificate program and the family rent to owner in the rental voucher program. (24 CFR 982, Subpart K)

**PHA Response** Yes  No

11. Initial HQS Inspections. Newly leased units pass HQS inspection within the time period required. This includes both initial and turnover inspections for the PBV program. (24 CFR 982.305; 983.103(b)-(d)).

**PHA Response** Yes  No

12. Periodic HQS Inspections. The PHA has met its periodic inspection requirement for its units under contract (982.405 and 983.103(e)).

**PHA Response** Yes  No

13. Lease-Up. The PHA executes housing assistance contracts for the PHA's number of baseline voucher units, or expends its annual allocated budget authority.

**PHA Response** Yes  No

14a. Family Self-Sufficiency Enrollment. The PHA has enrolled families in FSS as required. (24 CFR 984.105)

**Applies only to PHAs required to administer an FSS program .**

**Check here if not applicable**

**PHA Response**

a. Number of mandatory FSS slots (Count units funded under the FY 1992 FSS incentive awards and in FY 1993 and later through 10/20/1998. Exclude units funded in connection with Section 8 and Section 23 project-based contract terminations; public housing demolition, disposition and replacement; HUD multifamily property sales; prepaid or terminated mortgages under section 236 or section 221(d)(3); and Section 8 renewal funding. Subtract the number of families that successfully completed their contracts on or after 10/21/1998.)

441

or, Number of mandatory FSS slots under HUD-approved exception

75%

b. Number of FSS families currently enrolled

329

c. Portability: If you are the **initial** PHA, enter the number of families currently enrolled in your FSS program, but who have moved under portability and whose Section 8 assistance is administered by another PHA

0

Percent of FSS slots filled (b + c divided by a)

N/A

14b. Percent of FSS Participants with Escrow Account Balances. The PHA has made progress in supporting family self-sufficiency as measured by the percent of currently enrolled FSS families with escrow account balances. (24 CFR 984.305)

**Applies only to PHAs required to administer an FSS program .**

**Check here if not applicable**

**PHA Response**      **Yes**       **No**

0

Portability: If you are the **initial** PHA, enter the number of families with FSS escrow accounts currently enrolled in your FSS program, but who have moved under portability and whose Section 8 assistance is administered by another PHA

**Deconcentration Bonus Indicator** (Optional and only for PHAs with jurisdiction in metropolitan FMR areas).

The PHA is submitting with this certification data which show that:

- (1) Half or more of all Section 8 families with children assisted by the PHA in its principal operating area resided in low poverty census tracts at the end of the last PHA FY;
  - (2) The percent of Section 8 mover families with children who moved to low poverty census tracts in the PHA's principal operating area during the last PHA FY is at least two percentage points higher than the percent of all Section 8 families with children who resided in low poverty census tracts at the end of the last PHA FY;
- or**
- (3) The percent of Section 8 mover families with children who moved to low poverty census tracts in the PHA's principal operating area over the last two PHA FYs is at least two percentage points higher than the percent of all Section 8 families with children who resided in low poverty census tracts at the end of the second to last PHA FY.

**PHA Response**      **Yes**       **No**       **If yes, attach completed deconcentration bonus indicator addendum.**

I hereby certify under penalty of perjury that, to the best of my knowledge, the above responses are true and correct for the PHA fiscal year indicated above. I also certify that, to my present knowledge, there is not evidence to indicate seriously deficient performance that casts doubt on the PHA's capacity to administer Section 8 rental assistance in accordance with Federal law and regulations.

**Warning:** Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802).

Executive Director, signature

Chairperson, Board of Commissioners, signature

**Chelsea J. Andrews**

**Roy O. Priest**

Date (mm/dd/yyyy) \_\_\_\_\_

Date (mm/dd/yyyy) \_\_\_\_\_

The PHA may include with its SEMAP certification any information bearing on the accuracy or completeness of the information used by the PHA in providing its certification.

# SEMAP Certification - Addendum for Reporting Data for Deconcentration Bonus Indicator

Date (mm/dd/yyyy) \_\_\_\_\_

PHA Name Housing Opportunities Commission

Principal Operating Area of PHA Montgomery County, MD  
(The geographic entity for which the Census tabulates data)

**Special Instructions for State or regional PHAs** Complete a copy of this addendum for each metropolitan area or portion of a metropolitan area (i.e., principal operating areas) where the PHA has assisted 20 or more Section 8 families with children in the last completed PHA FY. HUD will rate the areas separately and the separate ratings will then be weighted by the number of assisted families with children in each area and averaged to determine bonus points.

2020 Census Poverty Rate of Principal Operating Area 7.9%

## Criteria to Obtain Deconcentration Indicator Bonus Points

To qualify for bonus points, a PHA must complete the requested information and answer yes for only one of the 3 criteria below. However, State and regional PHAs must always complete line 1) b for each metropolitan principal operating area.

- 1) 2,185 a. Number of Section 8 families with children assisted by the PHA in its principal operating area at the end of the last PHA FY who live in low poverty census tracts. A low poverty census tract is a tract with a poverty rate at or below the overall poverty rate for the principal operating area of the PHA, or at or below 10% whichever is greater.
- 3,337 b. Total Section 8 families with children assisted by the PHA in its principal operating area at the end of the last PHA FY.
- 65% c. Percent of all Section 8 families with children residing in low poverty census tracts in the PHA's principal operating area at the end of the last PHA FY (line a divided by line b).
- Is line c 50% or more? Yes  No
- 2) \_\_\_\_\_ a. Percent of all Section 8 families with children residing in low poverty census tracts in the PHA's principal operating area at the end of the last completed PHA FY.
- \_\_\_\_\_ b. Number of Section 8 families with children who moved to low poverty census tracts during the last completed PHA FY.
- \_\_\_\_\_ c. Number of Section 8 families with children who moved during the last completed PHA FY.
- \_\_\_\_\_ d. Percent of all Section 8 mover families with children who moved to low poverty census tracts during the last PHA fiscal year (line b divided by line c).
- Is line d at least two percentage points higher than line a? Yes  No
- 3) \_\_\_\_\_ a. Percent of all Section 8 families with children residing in low poverty census tracts in the PHA's principal operating area at the end of the second to last completed PHA FY.
- \_\_\_\_\_ b. Number of Section 8 families with children who moved to low poverty census tracts during the last two completed PHA FYs.
- \_\_\_\_\_ c. Number of Section 8 families with children who moved during the last two completed PHA FYs.
- \_\_\_\_\_ d. Percent of all Section 8 mover families with children who moved to low poverty census tracts over the last two completed PHA FYs (line b divided by line c).
- Is line d at least two percentage points higher than line a? Yes  No

**If one of the 3 criteria above is met, the PHA may be eligible for 5 bonus points.**

**See instructions above concerning bonus points for State and regional PHAs.**