

Attachment A

FCRHA POLICY STATEMENT ON MAINTAINING REASONABLE INCOME MIX WITHIN PUBLIC HOUSING PROGRAM DEVELOPMENTS (POLICY FOR DECONCENTRATION OF POVERTY)

Purpose

Section 16 (a) of the United States Housing Act, as amended by Section 513 of the Quality Housing and Work Responsibility Act of 1998, prohibits a Public Housing Authority (PHA) from concentrating very low-income families, or other families with relatively low-incomes, in certain public housing projects, or certain buildings within projects. The Act also provides that 40 percent of all new admissions in public housing shall be families whose income at the time of their admission does not exceed 30 percent of the median income for the area. The PHA's admission policy may establish and utilize income-mix criteria designed to avoid concentration of very low income families in certain public housing developments and to ensure income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects.

Under HUD's final rule dated October 21, 1999, on preparing the 5-Year and Annual Plans, PHAs are considered to be in compliance with the Act's income mixing requirements (avoiding the concentration of poverty) if they determine the average incomes of families in their developments, defining high income developments as those with family incomes over 115 percent of the average and low income developments as those with family incomes under 85 percent of the average.¹ Problem developments are dealt with by admitting higher income tenants where the development has lower income levels and lower income tenants where the development has higher income levels.

In reviewing the FCRHA's existing admission policy for public housing, the Department of Housing and Community Development (HCD) analyzed the profiles of all public housing families being served as of August 2007, to determine how tenant income levels compare at each of FCRHA's project developments. Table 1 on page 4 presents the results of this analysis.

Current Policy Statement and Results of Analysis

The current policy statement of the FCRHA Public Housing Admissions and Occupancy Policy is that HCD must avoid concentrations of the most economically and socially deprived families in any one or all of the FCRHA's public housing projects. The policy does not provide for incentives to bring higher income tenants into lower income project areas and lower income tenants into higher income project areas. HCD found that the income levels for families in FCRHA public housing developments generally show adequate income mixing in conformance with FCRHA's Admissions and Occupancy policy. FCRHA's standards for tenant selection for public housing developments states that the

¹ On January 19, 2001, HUD provided further guidance to PHAs on deconcentration of poverty and income mixing. The FCRHA policy statement was not affected by this new guidance.

Authority follows nondiscriminatory policies in the assignment of applicants to dwelling units.

The FCRHA has 27 elderly and family developments in its public housing inventory. One development, the Audubon Apartments, is a 46 unit property with 32 efficiencies and 14 one-bedroom units. The efficiency units at the Audubon development may be leased to single, non-disabled, non-elderly persons who are public housing income eligible but would not otherwise be served by other FCRHA programs. This will provide housing opportunities for single working people and for homeless persons who would be in this category (non-elderly, non-disabled). Other developments such as the Belle View Apartments have one bedroom units for which priority is given to elderly and other families whose incomes are for the most part fixed and in the very low income category. For this reason, the FCRHA has excluded from its income mix analysis the Audubon units as well as all one-bedroom units in the public housing inventory.

The results of our analysis, which is presented in the following chart, showed that the average public housing household income of all families occupying two-bedroom units and larger is \$24,000. In addition, there are 8 higher income developments where HCD needs to admit more lower-income families and 7 lower income developments where HCD needs to admit more higher-income families.

**FCRHA PUBLIC HOUSING DEVELOPMENTS AFFECTED
BY HUD'S NEW INCOME MIXING GUIDANCE**

<u>Average Incomes of All Families Occupying</u>	
<u>Two Bedroom Units or Larger as of August, 2007</u>	\$24,000
15 Percent Above the Average Income of All Families	\$27,600
15 Percent Below the Average Income of All Families	\$20,400

Higher Income Developments (Need to Admit Lower Income Families)

1.	Robinson Square	\$29,517
2.	West Ford II	\$29,151
3.	Heritage Woods North, Colchester Town, Springfield Green	\$32,742
4.	Reston Town Center	\$30,822
5.	Ragan Oaks	\$29,370
6.	Water's Edge	\$31,391
7.	West Glade, Copper Mill, Monroe Chase, Virginia Station, Townes at Walney Oaks, Townes at Woodland Glen	\$29,203
8.	Greenwood II, Barkley Square	\$37,519

Lower Income Developments (Need to Admit Higher Income Families)

1.	The Atrium	\$18,870*
2.	Villages at Falls Church	\$17,375*
3.	Heritage Woods South	\$15,066
4.	Greenwood	\$20,076*
5.	Barros Circle	\$20,374
6.	Belle View	\$17,915*
7.	Old Mill Gardens	\$16,918

* Serves high number of persons with disabilities.

Policy Statement

Based on HUD's October 21, 1999, income mixing guidance, the FCRHA income mixing policy statement was modified to include the following additional measures to the existing standards for tenant selection.

1. In order to ensure relative parity among its housing developments, HCD will analyze the income levels of public housing tenants annually to determine the average incomes of families in their developments, defining high income developments as those with family incomes over 115 percent of the average and low income developments as those with family incomes under 85 percent of the average. Problem developments are dealt with by admitting higher income tenants where the development has lower income levels and lower income tenants where the development has higher income levels.
2. HCD will then identify those developments that are more than 15 percent above and below the average income of all families in our developments.
3. When a development is identified as having tenant income at 15 percent above or below the average income of all families in our developments as noted in step 2, HCD will implement a tenant selection procedure at the development that will give preference to either placing higher income tenants where the development has lower income tenants and lower income tenants where the development has higher income tenants.
4. The effective date for this policy was admissions taking place after October 1, 2000. This policy was revised for FY 2006 plan date. HCD will review the properties annually instead of every 6 months.

**Table I
Concentration of Poverty, Public
Housing**

Development	Total Units/Leases*	Average Household Income	Developments	Developments
			With Average Incomes Above 115 %	With Average Incomes Below 115 %
			(Lower Income Families Needed)	(Higher Income Families Needed)
Family Properties				
Rosedale Manor	69	\$22,710	No	No
Newington Station	36	\$25,745	No	No
The Park	24	\$27,018	No	No
Shadowood	17	\$22,209	No	No
The Atrium	14	\$18,870	No	Yes
Villages at Falls Church	30	\$17,375	No	Yes
Heritage Woods I	19	\$23,261	No	No
Robinson Square	46	\$29,517	Yes	No
Heritage Woods South	15	\$15,066	No	Yes
Sheffield Village	8	\$24,583	No	No
Greenwood	91	\$20,076	No	Yes
Briarcliff II	20	\$20,460	No	No
West Ford II	22	\$29,151	Yes	No
West Ford I	24	\$26,014	No	No
West Ford III	56	\$21,113	No	No
Barros Circle	42	\$20,374	No	Yes
Belle View	31	\$17,915	No	Yes
Kingsley Park	106	\$25,797	No	No
Heritage Woods North, Colchester, Springfield Green	25	\$32,742	Yes	No
Reston Town Center	30	\$30,822	Yes	No
Old Mill Gardens	52	\$16,918	No	Yes
Ragan Oaks	50	\$29,370	Yes	No
Tavener Lane	12	\$22,131	No	No
Water's Edge	9	\$31,391	Yes	No
The Green/West Glade	50	\$29,203	Yes	No
Greenwood II & Barkley	7	\$37,519	Yes	No
Average Family Incomes		<u>\$24,000</u>		
115 Percent Above the Average Income of All Families				\$27,600
115 Percent Below the Average Income of All Families				\$20,400

* Excludes one bedroom units. Data as of August 28, 2007; is the higher of units leased or the number of leases. Number of leases may be higher than the total units available because of the supportive shared housing program.