

**FCRHA POLICY STATEMENT ON MAINTAINING REASONABLE INCOME  
MIX WITHIN PUBLIC HOUSING PROGRAM DEVELOPMENTS  
(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.<sup>1</sup> Problem developments are dealt with by either 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 October 7, 2004, 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

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<sup>1</sup> 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 29 elderly and family developments in its public housing inventory. One development, the Audubon Apartments, has 46 efficiency and one-bedroom units almost exclusively dedicated to elderly families. 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, we have excluded from our 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 about \$18,948. In addition, there are 5 higher income developments where HCD needs to admit more lower income families and 9 lower income developments where HCD needs to admit more higher income families.

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

Average Incomes of All Families Occupying

<u>Two Bedroom Units or Larger as of October 7, 2004</u>	\$18,948
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15 Percent Above the Average Income of All Families	\$21,791
15 Percent Below the Average Income of All Families	\$16,106

Higher Income Developments (Need to Admit Lower Income Families)

1.	Heritage I	23,817
2.	Robinson Square	22,368
3.	Heritage Woods North	24,982
4.	Colchester	25,327
5.	Greenwood II	31,978

Lower Income Developments (Need to Admit Higher Income Families)

1.	Newington Station	15,957
2.	Villages of Falls Church	14,532
3.	Heritage Woods South	13,679
4.	Greenwood	15,144
5.	Briarcliff II	15,057
6.	West Ford I	15,579
7.	Belle View	13,748
8.	Kingsley Park	15,670
9.	Old Mill Gardens	15,989

**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 on a continuous twelve-month timetable 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 either 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 will be admissions taking place after October 1, 2000. This policy was revised for FY2006 plan date. HCD will review the properties on a yearly basis instead of every 6 months.

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

**Concentration of Poverty, Public Housing**

Development	Total Units	Average Household Income	Developments With Average Incomes Above 115 %	Developments With Average Incomes Below 115 %
			(Lower Income Families Needed)	(Higher Income Families Needed)
Family Properties				
Rosedale Manor	69	\$20,543	No	No
Newington Station	36	15,957	No	Yes
The Park	24	18,239	No	No
Shadowood	21	16,393	No	No
The Atrium	12	18,690	No	No
Villages of Falls Church	27	14,532	No	Yes
Heritage I	20	23,817	Yes	No
Robinson Square	50	22,368	Yes	No
Heritage Woods South	14	13,679	No	Yes
Sheffield Village	8	18,624	No	No
Greenwood	90	15,144	No	Yes
Briarcliff II	20	15,057	No	Yes
West Ford II	23	19,337	No	No
West Ford I	23	15,579	No	Yes
West Ford III	59	18,752	No	No
Barros Circle	42	17,637	No	No
Belle View	32	13,748	No	Yes
Kingsley Park	104	15,670	No	Yes
Heritage Woods North	12	24,982	Yes	No
Colchester	8	27,732	Yes	No
Springfield Green	5	19,363	No	No
Reston Town Center	30	18,169	No	No
Old Mill Gardens	52	15,989	No	Yes
Regan Oaks	51	20,905	No	No
Tavener Lane	12	17,126	No	No
Water's Edge	9	19,111	No	No
The Green	51	19,266	No	No
Greenwood II	4	31,978	Yes	No
Barkley	3	21,120	No	No

Average Family Incomes \$18,948

115 Percent Above the Average Income of All Families \$21,791  
115 Percent Below the Average Income of All Families \$16,106