

**DRAFT**

**Streamlined Annual PHA Plan**

**For Fiscal Year: 2008-2009**

**PHA Name: PASADENA COMMUNITY  
DEVELOPMENT  
COMMISSION (PCDC)**

**PHA Plans**  
**Streamlined Annual**  
**Version**

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

OMB No. 2577-0226  
(exp. 08/31/2009)

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This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937 that introduced 5-year and annual PHA Plans. The full PHA plan provides a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission and strategies for serving the needs of low-income and very low-income families. This form allows eligible PHAs to make a streamlined annual Plan submission to HUD consistent with HUD's efforts to provide regulatory relief for certain types of PHAs. Public reporting burden for this information collection is estimated to average 11.7 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. HUD may not collect this information and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

**Privacy Act Notice.** The United States Department of Housing and Urban Development, Federal Housing Administration, is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated there under at Title 12, Code of Federal Regulations. Information in PHA plans is publicly available.

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**Streamlined (High Performance)**  
**Annual PHA Plan for Fiscal Year: 2008-2009**

**PHA Name: PASADENA COMMUNITY  
DEVELOPMENT COMMISSION (PCDC)**

**NOTE: This PHA Plan template (HUD-50075-SA) is to be completed in accordance with instructions contained in previous Notices PIH 99-33 (HA), 99-51 (HA), 2000-22 (HA), 2000-36 (HA), 2000-43 (HA), 2001-4 (HA), 2001-26 (HA), 2003-7 (HA), and any related notices HUD may subsequently issue.**





## Streamlined Annual PHA Plan Agency Identification

**PHA Name: Pasadena Community Development Commission (PCDC)**  
**PHA Number: CA 079**

**PHA Fiscal Year Beginning: July 2008**

### PHA Programs Administered:

**Public Housing and Section 8**       **Section 8 Only**       **Public Housing Only**  
Number of public housing units:      Number of S8 units: **1315**      Number of public housing units:  
Number of S8 units:

### PHA Plan Contact Information:

Name: **Myrtle Dunson**      Phone: **(626) 744-8300**  
TDD: **711**      Email (if available): **mdunson@cityofpasadena.net**

### Public Access to Information

Information regarding any activities outlined in this plan can be obtained by contacting:  
(select all that apply)

PHA's main administrative office       PHA's development management offices

City of Pasadena  
Housing/Community Development  
Renaissance Plaza  
649 N. Fair Oaks Avenue, Suite 202  
Pasadena, California 91103

### Display Locations For PHA Plans and Supporting Documents

The PHA Plan revised policies or program changes (including attachments) are available for public review and inspection.       Yes       No.

If yes, select all that apply:

Main administrative office of the PHA  
 Public library All 9 Branches of the Pasadena Public Library

- Central Library - 285 East Walnut Street, (626) 744-4052
- Allendale - 1130 S. Marengo Ave., (626) 799-2519
- Hastings - 3325 Orange Grove Blvd., (626) 792-0945
- Hill Avenue - 55 S. Hill Ave., (626) 796-1276
- Lamanda Park - 140 S. Altadena Drive, (626) 793-5672
- La Pintoresca - 1355 N. Raymond Ave., (626) 797-1873
- Linda Vista - 1281 Bryant Street, (626) 793-1808
- San Rafael - 1240 Nithsdale Road, (626) 795-7974

- Santa Catalina – 999 E. Washington Blvd., (626) 794-1219

Other

Pasadena City Clerk's Office  
100 North Garfield Avenue  
Pasadena, CA 91101

Community Facilities:

- Jackie Robinson Center – 1020 North Fair Oaks, (626) 791-7983
- Villa-Park Neighborhood Center – 363 East Villa, (626) 744-6530
- Pasadena Senior Citizens Center – 85 East Holly, (626) 795-4331
- Victory Park Center – 2575 Paloma, (626) 798-0865
- El Centro de Accion Social, Inc.- 37 East Del Mar (626) 792-3148

PHA Plan Supporting Documents are available for inspection at: (select all that apply)

Main business office of the PHA



**Streamlined Annual PHA Plan**  
**Fiscal Year 2008-2009**  
[24 CFR Part 903.12(c)]

**Table of Contents**  
[24 CFR 903.7(r)]

Provide a table of contents for the Plan, including applicable additional requirements, and a list of supporting documents available for public inspection.

<b>A. PHA PLAN COMPONENTS</b>	<b>Page Number</b>
<input checked="" type="checkbox"/> 1. Section 8(y) Homeownership 903.7(k)(1)(i) Statement of Homeownership Programs	13
<input checked="" type="checkbox"/> 2. Project-Based Voucher Programs	16
<input checked="" type="checkbox"/> 3. Supporting Documents Available for Review	17

**ATTACHMENTS**

- A – Housing and Community Development Organizational Chart
- B – City of Pasadena, Single Audit (Year ended June 30, 2007)
- C – Resident Advisory Board
- D – Resident Advisory Board Comments
- E – Public Hearing Comments
- F – Public Notices
- G – Administrative Plan Amendments







**B. SEPARATE HARD COPY SUBMISSIONS TO LOCAL HUD FIELD OFFICE**

**Form HUD-50076, PHA Certifications of Compliance with the PHA Plans and Related Regulations: Board Resolution to Accompany the Streamlined Annual Plan** identifying policies or programs the PHA has revised since submission of its last Annual Plan, and including Civil Rights certifications and assurances the changed policies were presented to the Resident Advisory Board for review and comment, approved by the PHA governing board, and made available for review and inspection at the PHA's principal office;

For PHAs Applying for Formula Capital Fund Program (CFP) Grants:

**Form HUD-50070, Certification for a Drug-Free Workplace;**

**Form HUD-50071, Certification of Payments to Influence Federal Transactions;** and

**Form SF-LLL & SF-LLL a, Disclosure of Lobbying Activities.**



## **Streamlined PHA Plan PHA Certifications of Compliance**

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

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### **PHA Certifications of Compliance with the PHA Plans and Related Regulations: Board Resolution to Accompany the *Streamlined Annual PHA Plan***

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the streamlined Annual PHA Plan for PHA fiscal year beginning July 1, 2008, hereinafter referred to as the Streamlined Annual Plan, of which this document is a part and make the following certifications, agreements with, and assurances to the Department of Housing and Urban Development (HUD) in connection with the submission of the Streamlined Plan and implementation thereof:

1. The streamlined Annual Plan is consistent with the applicable comprehensive housing affordability strategy (or any streamlined Plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, and provided this Board or Boards an opportunity to review and comment on any program and policy changes since submission of the last Annual Plan.
3. The PHA made the proposed streamlined Annual Plan, including policy and program revisions since submission of the last Annual Plan, and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the streamlined Plan and invited public comment.
4. The PHA will carry out the streamlined Annual Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
6. For streamlined Annual Plans that include a policy or change in policy for site-based waiting lists:  
The PHA regularly submits required data to HUD's MTCS in an accurate, complete and timely manner (as specified in PIH Notice 99-2);
  - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing;
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(b)(2).
7. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
8. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
9. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968,

Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

10. The PHA has submitted with the streamlined Plan a certification with regard to a drug-free workplace required by 24 CFR Part 24, Subpart F.

11. The PHA has submitted with the streamlined Plan a certification with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

12. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

13. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105( a).

14. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.

15. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

16. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

17. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

18. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments.).

19. The PHA will undertake only activities and programs covered by the streamlined Annual Plan in a manner consistent with its streamlined Annual Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its streamlined Plan.

20. All certifications and attachments (if any) to the streamlined Plan have been and will continue to be available at all times and all locations that the PHA streamlined Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the streamlined Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its streamlined Annual Plan and will continue to be made available at least at the primary business office of the PHA.

21. The PHA certifies that the following policies, programs, and plan components have been revised since submission of its last Annual PHA Plan (check all policies, programs, and components that have been changed):

- 903.7a Housing Needs
- 903.7b Eligibility, Selection, and Admissions Policies
- 903.7c Financial Resources
- 903.7d Rent Determination Policies
- 903.7h Demolition and Disposition
- 903.7k Homeownership Programs
- 903.7r Additional Information
  - A. Progress in meeting 5-year mission and goals
  - B. Criteria for substantial deviation and significant amendments
  - C. Other information requested by HUD
    - 1. Resident Advisory Board consultation process
    - 2. Membership of Resident Advisory Board
    - 3. Resident membership on PHA governing board

22. The PHA provides assurance as part of this certification regarding its streamlined annual PHA Plan that:

- (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
- (ii) The changes were duly approved by the PHA board of directors (or similar governing body); and
- (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.

Pasadena Community Development Commission  
PHA Name

CA 079  
PHA Number

Streamlined Annual PHA Plan for Fiscal Year: 2008-2009

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I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.  
**Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official  BERNARD K. MELEKIAN	Title  CHIEF EXECUTIVE OFFICER
Signature  X	Date





**Certification of Payments  
to Influence Federal Transactions**

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

Applicant Name

PASADENA COMMUNITY DEVELOPMENT COMMISSION

Program/Activity Receiving Federal Grant Funding

SECTION 8 TENANT - BASED RENTAL ASSISTANCE PROGRAM

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties.  
(18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official  BERNARD K. MELEKIAN	Title  CHIEF EXECUTIVE OFFICER
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Signature	Date (mm/dd/yyyy)
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Previous edition is obsolete

Form HUD 50071 (3/98)  
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3



**DISCLOSURE OF LOBBYING ACTIVITIES**

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352  
 (See reverse for public burden disclosure.)

Approved by OMB  
 0348-0046

<b>1. Type of Federal Action:</b> <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	<b>2. Status of Federal Action:</b> <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	<b>3. Report Type:</b> <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change <b>For Material Change Only:</b> year _____ quarter _____ date of last report _____
<b>4. Name and Address of Reporting Entity:</b> <input type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known:  Congressional District, if known: 4c	<b>5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:</b>  Congressional District, if known:	
<b>6. Federal Department/Agency:</b>	<b>7. Federal Program Name/Description:</b>  CFDA Number, if applicable: _____	
<b>8. Federal Action Number, if known:</b>	<b>9. Award Amount, if known:</b> \$ _____	
<b>10. a. Name and Address of Lobbying Registrant</b> <i>(if individual, last name, first name, MI):</i>	<b>b. Individuals Performing Services</b> <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i>	
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature: _____ Print Name: <u>BERNARD K. MELEKIAN</u> Title: <u>CHIEF EXECUTIVE OFFICER</u> Telephone No.: <u>626-744-8300</u> Date: _____	
<b>Federal Use Only:</b>		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

## INSTRUCTIONS FOR COMPLETION OF SF-LLL, DISCLOSURE OF LOBBYING ACTIVITIES

This disclosure form shall be completed by the reporting entity, whether sub awardee or prime Federal recipient, at the initiation or receipt of a covered Federal action, or a material change to a previous filing, pursuant to title 31 U.S.C. section 1352. The filing of a form is required for each payment or agreement to make payment to any lobbying entity for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action. Complete all items that apply for both the initial filing and material change report. Refer to the implementing guidance published by the Office of Management and Budget for additional information.

1. Identify the type of covered Federal action for which lobbying activity is and/or has been secured to influence the outcome of a covered Federal action.

2. Identify the status of the covered Federal action.

3. Identify the appropriate classification of this report. If this is a follow up report caused by a material change to the information previously reported, enter the year and quarter in which the change occurred. Enter the date of the last previously submitted report by this reporting entity for this covered Federal action.

4.

Enter the full name, address, city, State and zip code of the reporting entity. Include Congressional District, if known. Check the appropriate classification of the reporting entity that designates if it is, or expects to be, a prime or sub award recipient. Identify the tier of the sub awardee, e.g., the first sub awardee of the prime is the 1st tier. Sub awards include but are not limited to subcontracts, sub grants and contract awards under grants.

5. If the organization filing the report in item 4 checks "Subawardee," then enter the full name, address, city, State and zip code of the prime Federal recipient. Include Congressional District, if known.

6. Enter the name of the Federal agency making the award or loan commitment. Include at least one organizational level below agency name, if known. For example, Department of Transportation, United States Coast Guard.

7. Enter the Federal program name or description for the covered Federal action (item 1). If known, enter the full Catalog of Federal Domestic Assistance (CFDA) number for grants, cooperative agreements, loans, and loan commitments.

8. Enter the most appropriate Federal identifying number available for the Federal action identified in item 1 (e.g., Request for Proposal (RFP) number; Invitation for Bid (IFB) number; grant announcement number; the contract, grant, or loan award number; the application/proposal control number assigned by the Federal agency). Include prefixes, e.g., "RFP-DE-90-001."

9. For a covered Federal action where there has been an award or loan commitment by the Federal agency, enter the Federal amount of the award/loan commitment for the prime entity identified in item 4 or 5.

10. (a) Enter the full name, address, city, State and zip code of the lobbying registrant under the Lobbying Disclosure Act of 1995 engaged by the reporting entity identified in item 4 to influence the covered Federal action.

(b) Enter the full names of the individual(s) performing services, and include full address if different from 10 (a). Enter Last Name, First Name, and Middle Initial (MI).

11. The certifying official shall sign and date the form, print his/her name, title, and telephone number.

According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB control number for this information collection is OMB No. 0348-0046. Public reporting burden for this collection of information is estimated to average 10 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0046), Washington, DC 20503.

# Certification for Drug-Free Workplace

U.S. Department of Housing  
and Urban Development

Applicant Name

Pasadena Community Development Commission

Program/Activity Receiving Federal Grant Funding

## Section 8 Tenant - Based Rental Assistance Program

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:

a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b. Establishing an on-going drug-free awareness program to inform employees ---

(1) The dangers of drug abuse in the workplace;

(2) The Applicant's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;

d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

2. **Sites for Work Performance.** The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)

Check here  if there are workplaces on file that are not identified on the attached sheets.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

**Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties.  
(18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Title

CHIEF EXECUTIVE OFFICER

Signature

Date

X





**1. Section 8 Tenant Based Assistance--Section 8(y) Homeownership Program**  
(if applicable) [24 CFR Part 903.12(c), 903.7(k)(1)(i)]

1.  Yes  No: Does the PHA plan to administer a Section 8 Homeownership program pursuant to Section 8(y) of the U.S.H.A. of 1937, as implemented by 24 CFR part 982? (If "No", skip to the next component; if "yes", complete each program description below (copy and complete questions for each program identified.)

2. Program Description:

a. Size of Program

- Yes  No: Will the PHA limit the number of families participating in the Section 8 homeownership option?

If the answer to the question above was yes, what is the maximum number of participants this fiscal year? 2

b. PHA-established eligibility criteria

- Yes  No: Will the PHA's program have eligibility criteria for participation in its Section 8 Homeownership Option program in addition to HUD criteria?  
If yes, list criteria:

**Eligibility Requirements** [24 CFR 982.625 and 24 CFR 982.627]. Applicant and participant families must meet all of the following requirements prior to commencement of homeownership assistance:

- a. Household contains at least one adult family member who has been fully employed for at least one (1) year.
- b. A graduate of, or currently enrolled in the Family Self-Sufficiency ("FSS") Program for a minimum of 12 months, and in compliance with the provisions of the FSS Program Contract Of Participation (form HUD-52650) entered into between PCDC and the FSS family.
- c. Successfully completion of the required Homeownership course work (this requirement may be waived at discretion of PCDC Housing and Community Development Division Administrator).
- d. Eligible for the Section 8 Housing Choice Voucher Program.
- e. First-time homebuyer status (a family that has not owned or had ownership interest in the past three years).



- f. Federal minimum income requirement: The family must have a gross annual income not less than the Federal minimum wage multiplied by 2,000 hours (currently \$10,300), based on the income of adult family members who will own the home. Unless the family is elderly or disabled, income from welfare assistance and SSI will not be counted towards this requirement.
  - g. Federal minimum employment requirement: At least one adult family member who will own the home must be currently employed full-time (defined as not less than an average of 30 hours per week) and must have been continuously employed for one year prior to homeownership assistance. A family member will be considered to have been continuously employed even if that family member has experienced a break in employment, provided that the break in employment: 1) did not exceed 30 calendar days; 2) did not occur within the six-month period immediately prior to the family's application to utilize the homeownership option; and 3) has been the only break in employment within the past 12 calendar months. This employment requirement does not apply to elderly or disabled families.
  - h. The family has had no family-caused violations of HUD's Housing Quality Standards within the last one (1) year.
  - i. The family is not within the initial 1-year period of a Housing Assistance Payments ("HAP") Contract.
  - j. The family does not owe money to PCDC.
  - k. The family has not committed any serious or repeated violations of a PCDC-assisted lease within the past three (3) years.
  - l. PCDC must approve a live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and usable by elderly persons and persons with disabilities.
  - m. PCDC may make homeownership available to all who qualify, or restrict homeownership to families or purposed defined by PCDC. PCDC may also limit the number of families assisted with homeownership.
- c. What actions will the PHA undertake to implement the program this year (list)?  
The actions would be:
- 1. Perform financial analysis to identify affordability gap for qualified Section 8 participants purchasing a home in Pasadena;
  - 2. Identify funding source(s) that would be available to subsidize the affordability gap;

3. Obtain approval of Pasadena Community Development Commission (PCDC) for program funding assistance ; and
4. Enter into a consultant services contract with local nonprofit Pasadena Neighborhood Housing Services, Inc. to coordinate activities of the various collaborative partner agencies that will be involved in this program (PCDC, Women at Work, Montebello Housing Development Corporation., PNHS, Fannie Mae, lenders, etc.).

3. Capacity of the PHA to Administer a Section 8 Homeownership Program:

The PHA has demonstrated its capacity to administer the program by (select all that apply):

- Establishing a minimum homeowner downpayment requirement of at least 3 percent of purchase price and requiring that at least 1 percent of the purchase price comes from the family's resources.
- Requiring that financing for purchase of a home under its Section 8 homeownership will be provided, insured or guaranteed by the state or Federal government; comply with secondary mortgage market underwriting requirements; or comply with generally accepted private sector underwriting standards.
- Partnering with a qualified agency or agencies to administer the program (list name(s) and years of experience below):
- Demonstrating that it has other relevant experience (list experience below):

The list would include:

- a. PCDC administers the Homeownership Opportunities Program ("HOP"), a program which provides 2<sup>nd</sup> trust deed loan assistance to qualified low and moderate income homebuyers.
- b. PCDC collaborates with other private and public agencies to provide homebuyer assistance and education (Pasadena Foothills Board of Realtors, Pasadena Neighborhood Housing Services, County of Los Angeles, California Cities Home Ownership Authority).
- c. PCDC and the City of Pasadena provide financial assistance and incentives to developers to build affordable home ownership units.





## **2. Use of the Project-Based Voucher Program**

### **Intent to Use Project-Based Assistance**

Yes  No: Does the PHA plan to “project-base” any tenant-based Section 8 vouchers in the coming year? If the answer is “no,” go to the next component. If yes, answer the following questions.

1.  Yes  No: Are there circumstances indicating that the project basing of the units, rather than tenant-basing of the same amount of assistance is an appropriate option? If yes, check which circumstances apply:

- low utilization rate for vouchers due to lack of suitable rental units
- access to neighborhoods outside of high poverty areas
- other (describe below):
  - safeguard possible displacement
  - safeguard rental increases

2. Indicate the number of units and general location of units (e.g. eligible census tracts or smaller areas within eligible census tracts):

As of January 16, 2003, PCDC was approved by HUD to project-base up to 206 tenant-based Section 8 Vouchers. Current locations participating:

- Woodbury Senior Apartments - 3 units
- Villa Los Robles - 2 units
- Centennial Place Apartments - 27 units
- 270 Parke Street - 3 units
- Orange Grove Gardens Apartments - 9 units





### **3. Supporting Documents Available for Review for Streamlined Annual PHA Plans**

PHAs are to indicate which documents are available for public review by placing a mark in the “Applicable & On Display” column in the appropriate rows. All listed documents must be on display if applicable to the program activities conducted by the PHA.

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Related Plan Component</b>
X	PHA Certifications of Compliance with the PHA Plans and Related Regulations and Board Resolution to Accompany the Standard Annual, Standard Five-Year, and Streamlined Five-Year/Annual Plans.	5 Year and Annual Plans
X	PHA Certifications of Compliance with the PHA Plans and Related Regulations and Board Resolution to Accompany the Streamlined Annual Plan.	Streamlined Annual Plans
X	Certification by State or Local Official of PHA Plan Consistency with Consolidated Plan.	5 Year and standard Annual Plans
X	Fair Housing Documentation Supporting Fair Housing Certifications: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions’ initiatives to affirmatively further fair housing that require the PHA’s involvement.	5 Year and Annual Plans
X	Section 8 rent determination (payment standard) policies (if included in plan, not necessary as a supporting document) and written analysis of Section 8 payment standard policies. <input checked="" type="checkbox"/> Check here if included in Section 8 Administrative Plan.	Annual Plan: Rent Determination
X	Results of latest Section 8 Management Assessment System (SEMAP).	Annual Plan: Management and Operations
X	Any policies governing any Section 8 special housing types <input checked="" type="checkbox"/> Check here if included in Section 8 Administrative Plan.	Annual Plan:
X	Section 8 informal review and hearing procedures. <input checked="" type="checkbox"/> Check here if included in Section 8 Administrative Plan.	Annual Plan: Grievance Procedures
X	Policies governing any Section 8 Homeownership program (Chapter 20 of the Section 8 Administrative Plan).	Annual Plan: Homeownership
X	FSS Action Plan(s) for Section 8 is included in Section 8 Administrative Plan.	Annual Plan
X	The results of the most recent fiscal year audit of the PHA conducted under the Single Audit Act as implemented by OMB Circular A-133, the results of that audit and the PHA’s response to any findings.	Annual Plan: Annual Audit
X	Resident Advisory Board Comments.	Annual Plan
X	Public Notices.	Annual Plan
X	Public Hearing Comments.	Annual Plan
X	Housing Authority Mutual Aid Network	Inter Agency Disaster Response
X	Violence Against Women and and Justice Department Act	Administrative Plan







## ATTACHMENTS

Attachment A – Housing and Community Development Organizational Chart

Attachment B – City of Pasadena, Single Audit (Year ended June 30, 2007)

Attachment C – Resident Advisory Board

Attachment D – Resident Advisory Board Comments

Attachment E – Public Hearing Comments

Attachment F – Public Notices

Attachment G – Administrative Plan Amendments



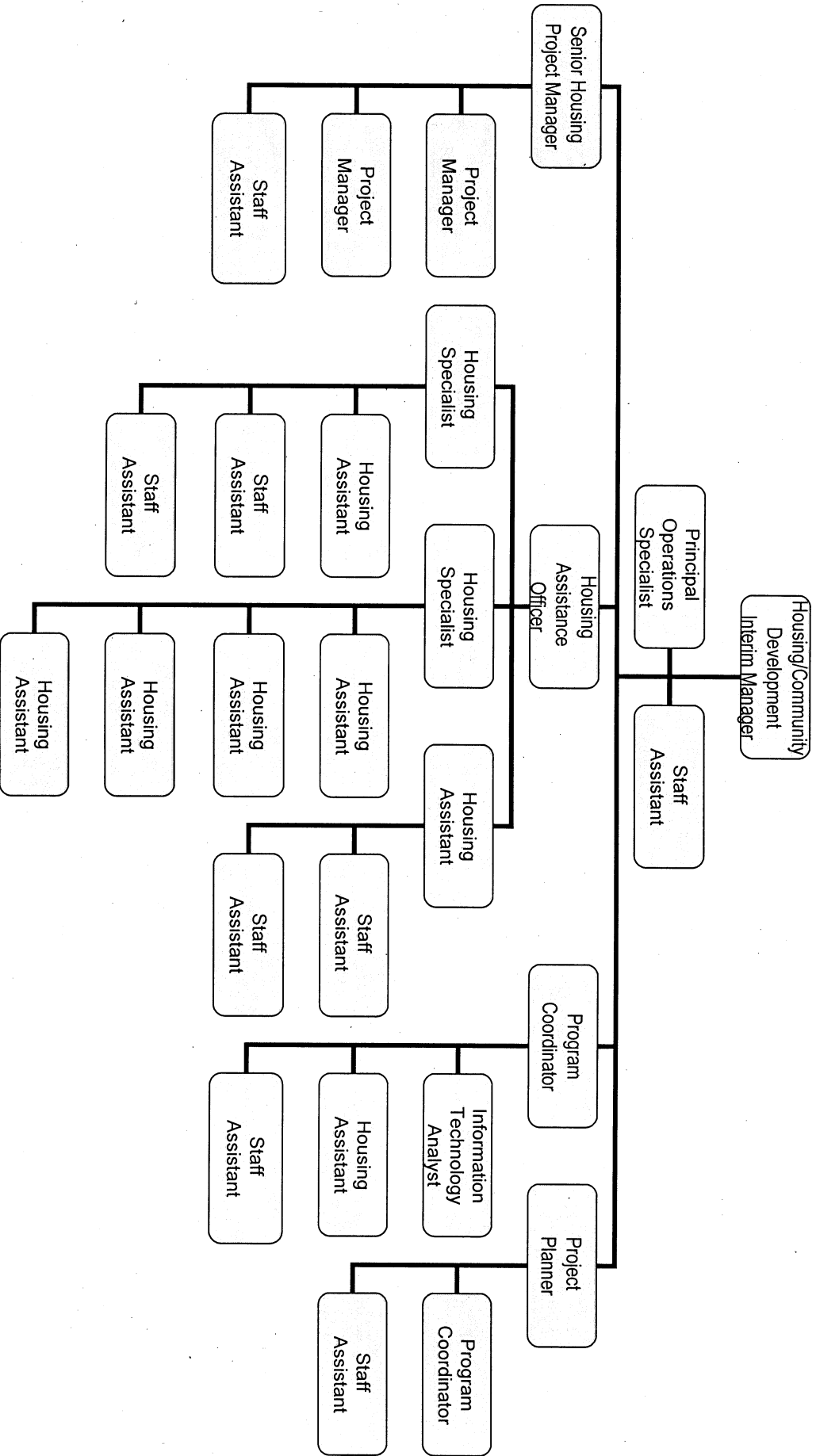


# ATTACHMENT "A"

## HOUSING AND COMMUNITY DEVELOPMENT ORGANIZATIONAL CHART



# OFFICE OF THE CITY MANAGER HOUSING AND COMMUNITY DEVELOPMENT









# ATTACHMENT "B"

CITY OF PASADENA

SINGLE AUDIT (YEAR ENDED JUNE 30, 2007)



CITY OF PASADENA  
Single Audit Report on Federal Awards  
Year ended June 30, 2007

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Honorable Mayor and City Council  
City of Pasadena, California

**REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING  
AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF  
FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH  
GOVERNMENT AUDITING STANDARDS**

We have audited the financial statements of the City of Pasadena, California (City) as of and for the year ended June 30, 2007, and have issued our report thereon dated November 26, 2007. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States.

Internal Control Over Financial Reporting

In planning and performing our audit, we considered the City of Pasadena's internal control over financial reporting (internal control) as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the City's internal control. Accordingly, we do not express an opinion on the effectiveness of the City's internal control.

A control deficiency exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect misstatements on a timely basis. A significant deficiency is a control deficiency, or combination of control deficiencies, that adversely affects the City's ability to initiate, authorize, record, process, or report financial data reliably in accordance with generally accepted accounting principles such that there is more than a remote likelihood that a misstatement of the City's financial statements that is more than inconsequential will not be prevented or detected by the City's internal control. Matters conforming to this definition are described in the accompanying schedule of findings and questioned costs as items 07-1, 07-2 and 07-3.

A material weakness is a significant deficiency, or combination of significant deficiencies, that results in more than a remote likelihood that a material misstatement of the financial statements will not be prevented or detected by the City's internal control.

Our consideration of internal control was for the limited purpose described in the first paragraph and would not necessarily identify all deficiencies in internal control that might be significant deficiencies or material weaknesses. We did not identify any deficiencies in internal control that we consider to be material weaknesses, as defined above.

Honorable Mayor and City Council  
City of Pasadena, California  
Page Two

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the City's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

The City of Pasadena's responses to the findings identified in our audit are described in the accompanying schedule of findings and questioned costs. We did not audit the City of Pasadena's responses and, accordingly, we express no opinion on them.

This report is intended solely for the information and use of City management, federal awarding agencies, and pass-through entities and is not intended to be and should not be used by anyone other than these specified parties.

*Mayor Hoffman McLaren P.C.*

Irvine, California  
November 26, 2007



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Honorable Mayor and City Council  
City of Pasadena, California

**REPORT ON COMPLIANCE WITH REQUIREMENTS APPLICABLE TO EACH  
MAJOR PROGRAM, INTERNAL CONTROL OVER COMPLIANCE AND ON  
THE SCHEDULE OF FEDERAL AWARDS IN ACCORDANCE WITH OMB  
CIRCULAR A-133**

Compliance

We have audited the compliance of City of Pasadena with the types of compliance requirements described in the *U.S. Office of Management and Budget (OMB) Circular A-133 Compliance Supplement* that are applicable to each of its major federal programs for the year ended June 30, 2007. The City of Pasadena's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs. Compliance with the requirements of laws, regulations, contracts and grants applicable to each of its major federal programs is the responsibility of the City of Pasadena's management. Our responsibility is to express an opinion on the City of Pasadena's compliance based on our audit.

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Those standards and OMB Circular A-133 require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the City of Pasadena's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances. We believe that our audit provides a reasonable basis for our opinion. Our audit does not provide a legal determination on the City of Pasadena's compliance with those requirements.

In our opinion, the City of Pasadena complied, in all material respects, with the requirements referred to above that are applicable to each of its major federal programs for the year ended June 30, 2007.

Internal Control Over Compliance

The management of the City of Pasadena is responsible for establishing and maintaining effective internal control over compliance with requirements of laws, regulations, contracts and grants applicable to federal programs. In planning and performing our audit, we considered the City of Pasadena's internal control over compliance with requirements that could have a direct and material effect on a major federal program in order to determine our auditing procedures for the purpose of expressing our opinion on compliance, but not for the purpose of expressing an opinion on the effectiveness of the City of Pasadena's internal control over compliance.



Honorable Mayor and City Council  
City of Pasadena, California  
Page Two

A control deficiency in an entity's internal control over compliance exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect noncompliance with a type of compliance requirement of a federal program on a timely basis. A significant deficiency is a control deficiency, or combination of control deficiencies, that adversely affects the entity's ability to administer a federal program such that there is more than a remote likelihood that noncompliance with a type of compliance requirement of a federal program that is more than inconsequential will not be prevented or detected by the entity's internal control.

A material weakness is a significant deficiency, or combination of significant deficiencies, that results in more than a remote likelihood that material noncompliance with a type of compliance requirement of a federal program will not be prevented or detected by the entity's internal control.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and would not necessarily identify all deficiencies in internal control that might be significant deficiencies or material weaknesses. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above.

#### Schedule of Expenditures and Federal Awards

We have audited the financial statements of the governmental activities, the business-type activities, the aggregate discretely presented component units, each major fund, and the aggregate remaining fund information of the City of Pasadena as of and for the year ended June 30, 2007, and have issued our report thereon dated November 26, 2007. Our audit was performed for the purpose of forming an opinion on the financial statements that collectively comprise the City of Pasadena's basic financial statements. The accompanying schedule of expenditures of federal awards and the supplementary information included in Schedule A-1 is presented for purposes of additional analysis as required by OMB Circular A-133 and is not a required part of the basic financial statements. Such information has been subjected to the auditing procedures applied in the audit of the financial statements and, in our opinion, is fairly stated, in all material respects, in relation to the basic financial statements taken as a whole.

This report is intended solely for the information and use of City management, federal awarding agencies, and pass-through entities and is not intended to be and should not be used by anyone other than these specific parties.

*Mayor Huffman Melara P.L.*

Irvine, California  
November 26, 2007

CITY OF PASADENA  
 Schedule of Expenditures of Federal Awards  
 Year ended June 30, 2007

	Federal Domestic Assistance Number	Program Identification Number	Program Expenditures	Amount Provided to Subrecipients
<u>Department of Housing and Urban Development</u>				
Direct Assistance:				
Community Development Block Grant Entitlement	14.218	n/a	\$ 2,377,382	1,003,414
Section 108 Loan - Fair Grove Shopping Center	14.248	n/a	<u>318,763</u>	-
Total CDBG Entitlement and Small Cities Grants			2,696,145	1,003,414
Section 8 Rental Voucher Program	14.871	CA079VO	10,895,333	-
Emergency Shelter Grant Program	14.231	n/a	92,046	92,046
Supportive Housing	14.235	n/a	1,011,636	1,011,636
Shelter Plus Care	14.238	n/a	92,494	-
Home-Investment in Affordable Housing	14.239	n/a	<u>1,028,215</u>	<u>795,616</u>
Total direct assistance			15,815,869	2,902,712
Passed through Pacific Clinics:				
Supportive Housing	14.235	10220000-305	43,326	-
Passed through the City of Los Angeles:				
Home Opportunities for Persons with AIDS	14.241	C98522	<u>32,984</u>	-
Total Department of Housing and Urban Development			<u>15,892,179</u>	<u>2,902,712</u>
<u>Department of Labor</u>				
Passed through the State of California:				
Workforce Investment Act - Adult	17.258	Various	548,656	70,680
Workforce Investment Act - Youth	17.259	Various	692,297	176,361
Workforce Investment Act - Dislocated Workers	17.260	Various	507,262	62,575
Workforce Investment Act - Rapid Response	17.260	Various	611,027	-
Workforce Investment Act - Foster Youth	17.267	Various	364,400	262,112
Workforce Investment Act - Incentive Grants	17.267	Various	200,537	-
Passed through the County of Los Angeles:				
Workforce Investment Act - Adult	17.258	Various	78,199	16,000
Workforce Investment Act - Youth	17.259	Various	69,414	25,126
Workforce Investment Act - Dislocated Workers	17.260	Various	<u>90,682</u>	<u>11,801</u>
Total Department of Labor			<u>3,162,474</u>	<u>624,655</u>

\* Major program  
 n/a = not available

(Continued)

See accompanying notes to the schedule of expenditures of federal awards.

CITY OF PASADENA  
 Schedule of Expenditures of Federal Awards  
 (Continued)

	Federal Domestic Assistance Number	Program Identification Number	Program Expenditures	Amount Provided to Subrecipients
<u>Department of Health and Human Services</u>				
Passed through the State of California				
Department of Health Services:				
Maternal and Child Health Services Block Grant	93.994	200661	267,863	-
Centers for Disease Control and Prevention - TB Control	93.283	TB CSGF 90-76	40,559	-
Child Health Development Program - Foster Care	93.658	n/a	47,224	-
Child Lead Poison Prevention	93.197	95-6000759	31,121	-
Early Periodic Screening Diagnosis and Treatment - Administrative	93.778	n/a	148,860	-
Medi-Cal Administrative Claiming	93.778	04-35118	484,229	-
Immunization Subvention Funds	93.268	98-15761,99-86354	57,697	-
Healthy Community Access Program - HCAP	93.252	G92CS06491A0	561,814	-
AIDS Drug Assistance Program - ADAP	93.917	n/a	8,110	-
Children's Outreach, Enrollment, Retention and Utilization	93.778	PH 000011	19,402	-
Passed through the County of Los Angeles:				
Alcohol and Drug Abuse/Mental Health Services Block Grant	93.992	Various	234,224	-
AIDS HIV Early Intervention	93.915	H209212	798,285	-
Total Department of Health and Human Services			<u>2,699,388</u>	<u>-</u>
<u>Department of Justice</u>				
Direct Assistance:				
Asset Forfeiture	16.000	CA 1953	52,879	-
Local Law Enforcement Block Grants Program	16.592	2006-DJ-BX-0215	44,877	-
Community Oriented Policing Services Grant	16.710	Various	283,288	-
Passed through the State of California Department of Criminal Justice and Planning:				
Elder Abuse and Advocacy and Outreach Program - VOCA Grant	16.575	EA 04077625	90,000	-
Total Department of Justice			<u>471,044</u>	<u>-</u>
<u>Department of Treasury</u>				
Direct Assistance:				
Asset Forfeiture	21.000	CA 1953	4,181	-
Total Department of Treasury			<u>4,181</u>	<u>-</u>

\* Major program  
 n/a = not available

(Continued)

See accompanying notes to the schedule of expenditures of federal awards.

CITY OF PASADENA  
 Schedule of Expenditures of Federal Awards  
 (Continued)

	Federal Domestic Assistance <u>Number</u>	Program Identification <u>Number</u>	Program <u>Expenditures</u>	Amount Provided to <u>Subrecipients</u>
<u>Department of Agriculture</u>				
Passed through the State of California Department of Health Services:				
Supplemental Food Program for Women, Infants and Children (WIC)	10.557	05-45781	698,419	-
Total Department of Agriculture			698,419	-
<u>Department of Transportation</u>				
Passed through the California Department of Transportation:				
Highway Planning and Construction	20.205	Various	9,278,110 *	-
Capital Assistance Program	20.513	SAG455127-10	32,701	-
State and Community Highway Safety	20.600	Various	330,244	-
Total Department of Transportation			9,641,055	-
<u>Department of Homeland Security</u>				
Passed through the County of Los Angeles:				
State Homeland Security Grant Program	97.005	Various	1,450,377 *	-
Urban Areas Security Initiative	97.008	Various	682,381	-
Pre-Disaster Mitigation Grant	97.017	2007-11,OES#037-56000	750,000	-
Public Assistance Grants	97.036	037-56000	114,571	-
Buffer Zone Protection Plan	97.078	2005-GR-T5-0068	45,000	-
Total Department of Homeland Security			3,042,329	-
Total Expenditures of Federal Awards			\$ 35,611,069	3,527,367

\* Major program  
 n/a = not available

See accompanying notes to the schedule of expenditures of federal awards.

CITY OF PASADENA

Notes to Schedule of Expenditures of Federal Awards

Year ended June 30, 2007

(1) Summary of Significant Accounting Policies Applicable to the Schedule of Expenditures of Federal Awards

(a) Scope of Presentation

The accompanying schedule presents only the expenditures incurred by the City of Pasadena that are reimbursable under the programs of federal agencies providing financial assistance. For the purposes of this schedule, financial assistance includes both federal financial assistance received directly from a federal agency, as well as federal funds received indirectly by the City from a non-federal agency or other organization. Only the portion of program expenditures reimbursable with such federal funds are reported in the accompanying schedule. Program expenditures in excess of the maximum federal reimbursement authorized or the portion of the program expenditures that were funded with state, local or other non-federal funds are excluded from the accompanying schedule.

(b) Basis of Accounting

The expenditures included in the accompanying schedule were reported on the modified accrual basis of accounting. Under the modified accrual basis of accounting, expenditures are incurred when the City becomes obligated for payment as a result of the receipt of the related goods and services. Expenditures reported included any property or equipment acquisitions incurred under the federal program.

(c) Subrecipients

During the fiscal year ended June 30, 2007, the City disbursed \$3,527,367 to subrecipients to be used for the federally allowable expenditures in accordance with the grant agreements.

(d) Loans Outstanding

Outstanding loans under the U.S. Department of Housing and Urban Development – Section 108 program were \$4,367,188 at June 30, 2007. Amounts expended from loan proceeds are reflected in the accompanying Schedule of Federal Awards. Outstanding loans under the U.S. Department of Housing and Urban Development – Community Development Block Grant program were \$272,844 at June 30, 2007. Amounts expended from loan proceeds are reflected in the accompanying Schedule of Federal Awards.

(e) Additional Disclosures for Elder Abuse and Advocacy and Outreach Program

Total grant expenditures for the Elder Abuse and Advocacy and Outreach Program of \$90,000 are comprised of \$7,897 for personnel services, \$82,103 for operating expenditures and \$0 for equipment. The match on the Victims of Crime Act (VOCA) grant was \$22,500 in operating expenditures.

Schedule A-1

CITY OF PASADENA  
 Financial Data Schedule  
 June 30, 2007

Line Item #	Account Description	Section 8 Rental Voucher Program
<u>Assets</u>		
Current assets:		
111	Cash - unrestricted	\$ 1,376,682
100	Total cash	<u>1,376,682</u>
128	Fraud recovery	<u>13,341</u>
120	Total receivables, net of allowances for doubtful accounts	<u>13,341</u>
131	Investments - unrestricted	<u>35,413</u>
150	Total current assets	<u>1,425,436</u>
190	Total assets	<u>\$ 1,425,436</u>
<u>Liabilities and Fund Balance</u>		
Current liabilities:		
312	Accounts payable, less than 90 days	\$ 13,413
321	Accrued wage/payroll tax payable	<u>42,384</u>
310	Total current liabilities	<u>55,797</u>
Non-current liabilities:		
353	Noncurrent liabilities - other	<u>55,624</u>
350	Total non-current liabilities	<u>55,624</u>
300	Total liabilities	<u>111,421</u>
Fund balance:		
512	Undesignated fund balance	<u>1,314,015</u>
513	Total fund balance	<u>1,314,015</u>
600	Total liabilities and fund balance	<u>\$ 1,425,436</u>

Schedule A-1 (Continued)

CITY OF PASADENA  
 Financial Data Schedule  
 Year ended June 30, 2007

Line Item #	Account Description	Section 8 Rental Voucher Program
	Revenues:	
706	HUD PHA grants	\$ 10,895,333
708	Other government grants	40,602
711	Investment income - unrestricted	72,055
714	Fraud recovery	36,362
715	Other revenue	<u>44,393</u>
700	Total revenues	<u>11,088,745</u>
	Operating Expenditures:	
912	Auditing fees	6,024
916	Other operating - administrative	<u>1,348,906</u>
969	Total operating expenditures	<u>1,354,930</u>
970	Excess operating revenues over operating expenditures	<u>9,733,815</u>
	Expenditures:	
973	Housing assistance payments	<u>9,657,363</u>
900	Total expenditures	<u>11,012,293</u>
1000	Excess (deficiency) of operating revenues over (under) expenditures	<u>\$ 76,452</u>
1103	Beginning equity	\$ 1,137,046
1104	Prior period adjustments, equity transfers and correction of errors	100,517
1120	Unit months available	15,393
1121	Number of unit months leased	15,393
1118	Housing assistance payments equity	\$ 1,314,015

CITY OF PASADENA  
Schedule of Findings and Questioned Costs  
Year ended June 30, 2007

(A) Summary of Auditors' Results

1. An unqualified report was issued by the auditors on the financial statements of the auditee.
2. There were no material weaknesses in internal control over financial reporting. There were three significant deficiencies in internal control over financial reporting that we described as items 07-1, 07-2 and 07-3.
3. The audit disclosed no noncompliance which is material to the financial statements of the auditee.
4. There were no material weaknesses in internal control over the major programs of the auditee.
5. An unqualified report was issued by the auditors on compliance for major programs.
6. The audit disclosed no audit findings required by the auditors to be reported under paragraph .510(a) of OMB Circular A-133.
7. The major programs of the auditee were as follows:
  - Department of Transportation – Highway Planning and Construction – CFDA #20.205
  - Department of Homeland Security – State Homeland Security Grant Program – CFDA #97.005
8. The dollar threshold used to distinguish Type A and Type B programs was \$1,068,332.
9. The auditee was considered a low risk auditee for the year ended June 30, 2007 for the purposes of determining major programs.

(B) Findings Related to the Financial Statements which are Required to be Reported in Accordance with GAGAS

(07-1) Internal Controls over Purchase Cards

We reviewed the City's corporate purchasing card activity for a thirty day period ending March 15, 2007. We obtained credit card statements and supporting documentation for the ten cards with the highest dollar value of transactions.



CITY OF PASADENA  
Schedule of Findings and Questioned Costs  
(Continued)

(B) Findings Related to the Financial Statements which are Required to be Reported in Accordance with GAGAS, (Continued)

(07-1) Internal Controls over Purchase Cards, (Continued)

During our review, we noted the following:

- a. Five cardholder statements had not been reviewed by an individual other than the cardholder.

Recommendation

We recommend that each cardholder statement be reviewed by another individual in that department who can verify whether the goods or services were actually received and whether those expenses related to the City department's business purpose.

Management's Comments Regarding Corrective Action Planned

The City's policy regarding use of Purchase Cards does not require separate review of cardholder statements. Rather monthly management reports on card usage have been available to all departments. In consultation with our outside auditors, the addition of a documented review of the management reports by a responsible and knowledgeable reviewer in each Department would address this item and item (07-1) c. Additionally, staff of the Purchasing Division performs random, periodic review of card usage.

- b. In our sample, one receipt was missing and a Purchasing Card Lost Receipt Form was not filled out by the cardholder until an inquiry was made. In addition, one cardholder statement had not been turned in to the Department of Finance.

Recommendation

The City's Purchasing Policy states that "statement reconciliation is mandatory...upon reconciliation, all statements must be received in the Department of Finance, Budget and Purchasing Division no later than the 1<sup>st</sup> working day of the month following the billing cycle." We recommend that management enforce adherence to the City's Purchasing Policy.

Management's Comments Regarding Corrective Action Planned

Compliance monitoring is ongoing. Cardholders who do not comply with the program requirements have their cards suspended and if necessary revoked. In order to better facilitate compliance with program requirements the Finance Department has begun the rollout of an upgraded purchasing card tracking

CITY OF PASADENA  
Schedule of Findings and Questioned Costs  
(Continued)

(B) Findings Related to the Financial Statements which are Required to be Reported in Accordance with GAGAS. (Continued)

(07-1) Internal Controls over Purchase Cards. (Continued)

system. This application allows cardholders to reconcile their monthly statements online, and allows for the suspension of cardholder purchasing privileges when statements have not been timely or properly reconciled.

- c. For four transactions, the relationship of the transaction to the business purpose of the department was not self-evident based upon the name of the vendor or the description on the receipt provided for that transaction.

Recommendation

The department's review of purchasing card transactions should include obtaining an understanding of the business purpose of transactions for which their relationship to department objectives is not clear. In some cases, this might involve contact by the departmental reviewer with the cardholder and documenting additional information for the transaction.

Management's Comments Regarding Corrective Action Planned

Management concurs with this recommendation. The corrective action planned in response to item (07-01 a.) Internal Controls over Purchase Cards is expected to address this recommendation.

(07-2) Excess Collection Refunds

Excess collection refunds resulting from various types of overpayments are processed by Municipal Services. A report is created in excel by an individual in Municipal Services and is then sent via email to the Department of Information Technology (IT). IT formats the report and sends it to Accounts Payable for processing. We recommend the controls below to reduce the risk that IT might add an unauthorized refund to the report since the final amount disbursed is not compared to what was initially approved by Municipal Services.

Recommendation

We recommend that the report that is created, reviewed, and approved in Municipal Services be signed and forwarded to Accounts Payable. Accounts Payable should ensure that the final amount disbursed agrees to what was initially approved by Municipal Services.

CITY OF PASADENA  
Schedule of Findings and Questioned Costs

(Continued)

(B) Findings Related to the Financial Statements which are Required to be Reported in Accordance with GAGAS, (Continued)

(07-2) Excess Collection Refunds, (Continued)

Management's Comments Regarding Corrective Action Planned

Accounts Payable already uses this technique for other payment processes similar to this and will implement this recommendation for the Excess Collection Refunds.

(07-3) Changes to Vendor Information

The Accounts Payable Supervisor has system access rights to add vendors, make changes to vendor information, and process invoices for payment within Peoplesoft (the accounting software). This combination of computer system access rights theoretically could allow the Accounts Payable Supervisor to input a fictitious vendor, create an invoice, and process a disbursement without detection by management.

Recommendation

We recommend that the Accounts Payable Supervisor be denied computer access rights to add vendors and to make other changes to vendor master file information.

Management's Comments Regarding Corrective Action Planned

Management agrees with this recommendation and will restrict the system access rights accordingly.

(C) Findings and Questioned Costs for Federal Awards as Defined in Paragraph .510(a) of OMB Circular A-133

There were no auditors' findings required to be reported in accordance with paragraph .510(a) at OMB Circular A-133.

CITY OF PASADENA  
Summary Schedule of Prior Audit Findings  
Year ended June 30, 2007

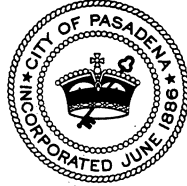
There were no prior year audit findings.



# ATTACHMENT "C"

## RESIDENT ADVISORY BOARD





PASADENA COMMUNITY DEVELOPMENT COMMISSION

January 14, 2008

Dear Program Participant:

The Pasadena Community Development Commission (PCDC) is in the process of preparing its Public Housing Authority (PHA) PHA Annual Plan for fiscal year 2008-2009, as required by the U.S. Department of Housing and Urban Development (HUD). PCDC is requesting your participation in this planning process through your comments and recommendations regarding the PHA Annual Plan.

The PHA Annual Plan describes PCDC's immediate operations, program participants, programs/services, and the strategy for handling operational concerns of the Rental Assistance Programs for the upcoming fiscal year.

The PHA Annual Plan will be reviewed and discussed at the Resident Advisory Board (RAB) meeting on Tuesday, February 19, 2008, from 11:00 a.m. to 12:00 p.m. Renaissance Plaza Community Room, 649 North Fair Oaks Ave, Suite 203. The PCDC extends an invitation to you to attend the RAB meeting. However, your participation is strictly voluntary and your rental assistance will not be affected if you choose not to attend this meeting.

If you have any questions or wish to obtain a copy of the PHA Annual Plan, please contact the PCDC, at (626) 744-8300.

Sincerely,

*Myrtle Dunson*

Myrtle Dunson  
Housing Assistance Officer  
Housing & Community Development







# ATTACHMENT "D"

## RESIDENT ADVISORY BOARD COMMENTS



# ATTACHMENT "E"

## PUBLIC HEARING COMMENTS



# ATTACHMENT "F"

## PUBLIC NOTICES





PUBLIC NOTICE OF THE AVAILABILITY FOR REVIEW OF THE PASADENA  
COMMUNITY DEVELOPMENT COMMISSION PUBLIC HOUSING  
AGENCY (PHA) ANNUAL PLAN FOR FISCAL YEAR 2008-2009.

The Pasadena Community Development Commission (PCDC) announces that in compliance with the Quality Housing and Work Responsibility Act of 1998 (QHWRA), U.S. Department of Housing and Urban Development (HUD) PHA Plan Final Rule (24 CFR Part 903), Public and Indian Housing (PIH) Notice 2000-43, the PCDC PHA Annual Plan (2008–2009), will be available January 28, 2008, for public view.

The Annual Plan (2008-2009) describes the PCDC's immediate operations, assesses housing assistance needs, housing stock conditions, and rental housing subsidy needs of lower income households for the upcoming fiscal year.

The City of Pasadena Community Development Commission is extremely interested in improving and increasing communication with Pasadena's citizens in the area of housing. Comments on the plan are requested and encouraged.

The PHA Annual Plan will be available for public review at the following locations:

**Housing and Community Development:**

Renaissance Plaza,  
649 North Fair Oaks Avenue, Suite 202,  
Pasadena, CA 91103  
Office hours are Monday – Thursday between 8:00 a.m. - 5:00 p.m.

**Community Facilities:**

Jackie Robinson Center – 1020 North Fair Oaks,	791-7983
Villa-Parke Neighborhood Center – 363 East Villa,	744-6530
Pasadena Senior Citizens Center – 85 East Holly,	795-4331
Victory Park Center – 2575 Paloma,	798-0865
El Centro de Accion Social, Inc.- 37 East Del Mar	792-3148

**All Branches of the Pasadena Public Library:**

Central Library - 285 East Walnut,	744-4052
Allendale – 1130 South Marengo,	799-2519
Hastings – 3325 East Orange Grove,	792-0945
Hill Avenue – 55 South Hill,	796-1276
Lamanda Park – 140 South Altadena Drive,	793-5672
La Pintesca – 1355 North Raymond,	797-1873
Linda Vista – 1281 Bryant,	793-1808
San Rafael – 1240 Nithsdale Road,	795-7974
Santa Catalina – 999 East Washington,	794-1219

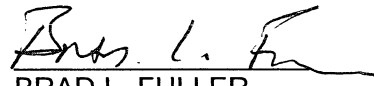
*\*Check these facilities for hours of availability*

The PHA Annual Plan will be considered by the Pasadena Community Development Commission on April 7, 2008, and if adopted by the Commission, will be submitted to the U.S. Department of Housing and Urban Development, shortly thereafter.

Comments in writing, from the public, on the PHA Annual Plan will be received by Housing and Community Development, located at Renaissance Plaza, 649 North Fair Oaks Avenue, Suite 202, Pasadena, CA from January 28 2008 to April 7, 2008. If you have any questions call Myrtle Dunson, City of Pasadena, Housing and Community Development, at (626) 744-8300.

Publish:  
Pasadena Star News  
Pasadena Journal

Approved as to Form:

  
BRAD L. FULLER  
Assistant City Attorney

Publish Once:  
Account Number: 8112 220 684210 50108

PHA: (626) 744-8300  
FAX: (626) 744-8340

NOTICE TO THE PUBLIC OF A PUBLIC HEARING BY THE PASADENA  
COMMUNITY DEVELOPMENT COMMISSION TO CONSIDER THE  
APPROVAL OF THE PUBLIC HOUSING AGENCY (PHA) ANNUAL PLAN  
(2008 - 2009).

In accordance with 24 Code of Federal Regulations, Part 903 et seq., as published by the U.S. Department of Housing and Urban Development (HUD) on December 22, 2000, in the Federal Register, Public and Indian Housing (PIH) Notice 2000-43, and the Quality Housing and Work Responsibility Act of 1998, the Pasadena Community Development Commission (Commission) hereby gives notice that the Public Housing Agency (PHA) Annual Plan (2008-2009), will be considered for approval at a public hearing by the Pasadena Community Development Commission on Monday, April 7, 2008 at 8:00 p.m., or as soon thereafter as the matter may be heard, Council Chambers, Room S249, 100 North Garfield Avenue, Pasadena, California. The purpose of the public hearing is to obtain the views of citizens, service providers, participants, and interested individuals regarding the development of the PHA Annual Plan (2008-2009).

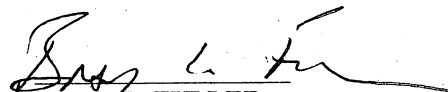
The Annual Plan (2008-2009) describes the Commission's immediate operations, assesses housing assistance needs, housing stock conditions, and rental housing subsidy needs of lower income households for the upcoming fiscal year.

Upon approval by the Commission, the Public Housing Agency (PHA) Annual Plan (2008-2009) will be submitted to HUD to ensure the City will continue to receive federal funds that benefit very low income individuals and households from the rental assistance programs. Rental Assistance Programs subsidies will be contingent upon the availability of funding to the City from HUD, as well as, the preparation and submittal to HUD of the PHA Annual Plans.

ALL INTERESTED AGENCIES, GROUPS, OR INDIVIDUALS who wish to be heard on this matter are invited to attend this public hearing and speak to the Commission at the time and place stated. The Commission will consider approval of the Public Housing Agency (PHA) Annual Plan (2008-2009) at the public hearing after receiving testimony, oral or written.

If you have any questions or require information regarding the Public Housing Agency (PHA) Annual Plan (2008-2009), and/or the process, contact Myrtle Dunson, Housing Assistance Officer, at (626) 744-8300, or provide written comments to: Office of the City Manager Housing and Community Development, 649 N. Fair Oaks Ave., Suite 202, Pasadena, California 91103.

Approved as to Form:

  
**BRAD L. FULLER**  
Assistant City Attorney

Publish:  
Pasadena Journal  
Pasadena Star News

**AVISO AL PÚBLICO QUE EL PLAN ANUAL POR EL AÑO FISCAL 2008-2009 DE LA COMISION DE DESARROLLO COMUNITARIO DE PASADENA, ESTA A DISPOSICION PARA EXAMINAR.**

La Comision de Desarrollo Comunitario de Pasadena (PCDC) anuncia que el Plan Anual (2008-2009) de la Comision de Desarrollo Comunitario como requiere el Acto de Calidad de Vivienda y Responsabilidad de Trabajo de 1998 (QHWRA, siglas en ingles), el Plan de Regla Final (24 CFR Part 903) del Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos (HUD, siglas en ingles) y la Noticia 2000-43 de la Vivienda Publica India (PIH, siglas en ingles) que el Plan Anual (2008-2009) estara disponible al publico para examinar el 28 de enero del 2008.

El Plan Anual (2008-2009) identifica las operaciones inmediatas de la PCDC, evalúa las necesidades de vivienda, condiciones de abastecimiento de vivienda, y las necesidades de subsidio de vivienda para familias de bajos ingresos para en año fiscal venidero.

La Comisión de Desarrollo Comunitario de la Ciudad de Pasadena esta extremadamente interesada en mejorar y aumentar la comunicación con los ciudadanos de Pasadena en el área de vivienda. Se les pide e invita a hacer comentarios en relación a este plan.

El Plan Anual de la PHA estará a disposición del público para examinar en las siguientes localidades:

**1. DIVISION DE VIVIENDA Y DESARROLLO COMUNITARIO:**

División de Vivienda  
Renaissance Plaza,  
649 N. Fair Oaks Ave., Suite 202,  
Pasadena, CA 91103  
Horas hábiles: de lunes a jueves entre las 8:00 a.m. a 5:00 p.m.

**2. CENTROS COMUNITARIOS:**

Jackie Robinson Center – 1020 North Fair Oaks	791-7983
Villa-Parke Neighborhood Center – 363 East Villa	744-6530
Pasadena Senior Citizens Center - 85 East Holly	795-4331
Victory Park Center – 2575 Paloma -	798-0865
El Centro de Acción Social, Inc. – 37 East Del Mar	792-3148

**3. TODAS LAS SUCURSALES DE BIBLIOTECA PÚBLICA:**

Central Library – 285 East Walnut	744-4052
Allendale – 1130 South Marengo	799-2519
Hastings – 3325 East Orange Grove Blvd.	792-0945
Hill Avenue – 55 South Hill	796-1276
Lamanda Park – 140 South Altadena Drive	793-5672
La Pintoresca – 1355 North Raymond	797-1873
Linda Vista – 1281 Bryant	793-1808
San Rafael – 1240 Nithsdale Road	795-7974
Santa Catalina – 999 East Washington	794-1219

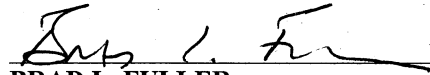
**\*Favor de verificar las horas de eficacia directamente con estos lugares.**

El Plan Anual de la PHA será considerado por la Comisión de Desarrollo Comunitario de Pasadena el 7 de abril del 2008, de ser aprobado por la Comisión, será sometido al Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos, inmediatamente después.

Comentarios por escrito, del publico, acerca del Plan Anual de la PHA serán recibidos por la División de Vivienda y Desarrollo Comunitario de la Ciudad, localizado en la Renaissance Plaza, 649 N. Fair Oaks Ave., Suite 202, Pasadena, CA del 28 de enero del 2008 al 7 de abril del 2008. Si tiene alguna pregunta, llame a Myrtle Dunson, Divison de Vivienda y Desarrollo Comunitario de la Ciudad de Pasadena al (626) 744-8300.

Publish:  
La Opinion

Aprobado tal como esta:



**BRAD L. FULLER**  
Asistente Abogado de la Ciudad

Publicar una sola vez:  
Número de Cuenta: 8112 220 684210 50108

PHA: (626) 744-8300  
FAX: (626) 744-8340

**AVISO AL PÚBLICO DE UNA AUDIENCIA PÚBLICA DE LA COMISIÓN DE DESARROLLO COMUNITARIO DE PASADENA PARA CONSIDERAR LA APROBACIÓN DEL PLAN ANUAL (2008-2009) DE LA AGENCIA DE LA VIVIENDA PÚBLICA (PHA)**

De acuerdo con el código 24 de las regulaciones Federales, parte 903 et. Seq., tal como lo público el Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos (HUD), por sus siglas en inglés, el 22 de diciembre del 2000, en el Registro Federal, el aviso 2000-43 Vivienda Pública para la Comunidad Indígena (PIH), por sus siglas en inglés, y la ley de Responsabilidad Laboral y Calidad de la Vivienda de 1998, La Comisión de Desarrollo Comunitario de Pasadena (Comisión) da por este medio el aviso que el Plan Anual de la Agencia de la Vivienda Pública (PHA) (2008-2009), será considerado para su aprobación en una audiencia pública por la Comisión de Desarrollo Comunitario el lunes 7 de abril del 2008, a las 8:00 p.m., o en cuanto el asunto pueda escucharse en las Camaras del Consejo, sala S249, en el 100 Norte Garfield Avenue, Pasadena, California. El propósito de la audiencia pública es para obtener la opinión de los ciudadanos, proveedores de servicios, participantes y personas interesadas en el desarrollo del Plan Anual del PHA (2008-2009).

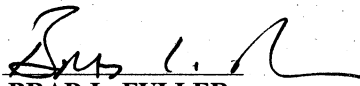
El Plan Anual (2008-2009) describe las operaciones inmediatas de la Comisión, evalúa las necesidades de ayuda para la vivienda, la condición de viviendas disponibles, y las necesidades de ayuda financiera para pagar la renta de personas de bajos ingresos para el próximo año fiscal.

Una vez que la Comisión apruebe, el Plan Anual de la Agencia de la Vivienda Pública (PHA) (2008-2009) será presentado a la HUD para asegurarse que la Ciudad continúe recibiendo fondos federales que benefician a personas de bajos ingresos económicos del programa de asistencia para la renta. El financiamiento del programa de ayuda económica para pagar la renta estará sujeto a la disponibilidad de fondos que le de a la Ciudad HUD, así como también de la preparación y la entrega al HUD de los Planes Anuales de PHA.

TODAS LAS AGENCIAS, GRUPOS, O PERSONAS INTERESADAS que deseen ser escuchadas sobre éste asunto se les invita a asistir a ésta audiencia pública y hablar ante la Comisión en el lugar y hora estipulada. La Comisión considerará la aprobación del Plan Anual (2008-2009) de la Agencia de la Vivienda Pública en la audiencia pública después de haber recibidos los testimonios, orales y escritos.

Si usted tiene alguna pregunta o necesita información en relación al Plan Anual (2008-2009) de la Agencia de la Vivienda Pública, y/o del proceso, comuníquese con Myrtle Dunson, Oficial Asistente de la Vivienda al (626) 744-8300, o puede ofrecer comentarios por escrito a: Oficina Administrador Ciudad, Vivienda y Desarrollo Comunitario, 649 N. Fair Oaks Ave., Suite 202, Pasadena, California 91103.

Aprobado tal como está



**BRAD L. FULLER**

Asistente Abogado de la Ciudad

Publicar:



# ATTACHMENT "G"

## ADMINISTRATIVE PLAN AMENDMENTS



## **Chapter 24**

### **Enterprise Income Verification (EIV)**

#### **Security Policy and Procedures**

#### ***The Enterprise Income Verification System (EIV)***

The EIV system is intended to provide a single source of income-related data to PHAs for use in verifying the income reported by participants in the various assisted housing programs. The Office of Public and Indian Housing (PIH) is responsible for administering and maintaining the EIV system.

#### ***Types of Upfront Verification of Income Provided by EIV***

The EIV system compares the participant income data obtained from various sources including:

- Participant-supplied income data captured on Form HUD-50058 and maintained in the PIC databases;
- U.S. Department of Health and Human Services, National Directory of New Hires (NDNH) data. NDNH becomes the single source for wage, unemployment insurance benefit information, and the new hire (employment) information;
- Social Security and Supplemental Security Income from the Social Security Administration (information formerly accessed through TASS); and
- User profile information from the PIC database.

#### ***What EIV Participant Data Is Used For***

EIV data is the first level in the hierarchy of income verification. The EIV data may be used in the following way:

- To verify a participant's eligibility for participation in a HUD rental assistance program and to determine the level of assistance the participant is entitled to receive; and
- No adverse action can be taken against a participant until the PHA has independently verified the EIV and the participant has been granted an opportunity to contest any adverse findings through the established grievance hearing, or other legal procedures (Chapter 7 Verification Procedures).

#### ***Applicability***

The procedures in this document apply to all PCDC staff that access EIV data.

### ***Purpose***

The purpose of this document is to establish the PCDC's policies and procedures to assure that the practices, controls and safeguards used by Public Housing are in compliance with the Federal laws regarding the protection of this information.

### ***Privacy Act***

The data provided via the EIV system will be protected to ensure that it is only used for official purposes and not disclosed in any way that would violate the privacy of the individuals represented in the system data. Privacy of data and data security for computer systems are covered by a variety of Federal laws and regulations. The Privacy Act of 1974 as amended, 5 U.S.C. 552 (a) is one such regulation. The full text of the Privacy Act can be accessed at <http://www.usdoj.gov/fois/privstat.htm>.

### ***Examples of Privacy Act Violations***

Public Housing will not rely entirely upon staff to read and understand the Privacy Act. To ensure that staff has a complete understanding of the Privacy Act and how seemingly harmless actions may be violations, examples of a Privacy Act violations will be provided during security awareness training. The following example of a security violation was explained during the HUD Satellite Broadcast introducing the EIV system:

EIV data can only be viewed by authorized PHA staff and the individual adult who the information pertains to. This means that EIV data for an adult household member in a participant family cannot be shared with another adult household member of the participant family (even the head of household) unless that family member is present or signs a waiver authorizing the other family member to view their EIV information. The Privacy Act protects the privacy of each adult family member from any unauthorized person viewing their EIV data, even another family member. However, EIV data for minor children may be viewed by the Head of Household.

### ***Public Housing Security Officer(s)***

A Public Housing EIV Security Officer(s), is responsible for ensuring that proper technical, physical, and administrative safeguards are in place and enforced. The duties of the security officer are as follows:

- Conducts quarterly reviews of all User IDs issued to determine if the users still have a valid need to access the EIV data and modifies or revokes access rights as appropriate;
- At the request of the Director, updates the EIV Security Policy and Procedures;
- Maintains a key control log or audits the key control log to ensure that one is properly maintained (PCDC locking file cabinets);
- Maintains a list of users who can access the restricted areas;
- Assures that a copy of Form HUD-9886 has been signed by each member of the household age 18 years or older and is in the household file;
- Ensures compliance with the PHA security policies and procedures outlined in this document;

- Communicates security information and requirements to appropriate personnel, including coordinating and conducting security awareness training sessions;
- Ensures that any infractions of security procedures are promptly reported to Department Director for investigation and enforcement; and
- Ensures that all EIV records and forms (i.e. signed user agreements) are kept and updated as needed.

### ***Security Awareness Training***

Security awareness training is a crucial aspect of ensuring the security of the EIV system and data. Users and potential users will be made aware of the importance of respecting the privacy of data, following established procedures to maintain privacy and security, and notifying management in the event of a security or privacy violation.

In addition to security awareness training, the Security Officer(s) will communicate security information and requirements to appropriate personnel. Security Awareness training will be provided to each employee upon granting access to the EIV system. Thereafter, annual security awareness refresher training will be provided to each employee with EIV access.

The PH EIV Officer(s) will conduct security awareness training in the following manner:

- The trainer and the employee will both sign a certification that EIV security training has been provided. The training certification and a record of the training material provided at the awareness training will be kept in the PH EIV Security binder.
- At the end of the training, each employee will also sign the EIV Rules of Behavior and User Agreement form. One copy will be given to the employee to be placed in their desk manual and one copy will be retained in the PH EIV Security binder. The forms will be updated once a year at the refresher training.
- The PH Security Officer(s) will limit the security awareness training to security awareness and compliance issues only. Instructing staff on how to navigate in the EIV modules and how to run reports or to interpret data is the responsibility of the Supervisor or designated trainer.
- Examples of potential Privacy Act and security violations will be provided during the training.

### ***Technical Safeguards***

The purpose of these technical safeguards is as follows:

- To reduce the risk of a security violation related to the EIV system's software, network, or applications;
- To identify and authenticate all users seeking access to the EIV system;
- To deter and detect attempts to access the system without authorization;
- To monitor the user activity of the EIV system;
- Each user is required to have their own User ID and Password;
- The User ID identifies the PHA's and tenant information that the user is authorized to access;

- Passwords are encrypted and the password file is protected from unauthorized access;
- The system forces all user to change their password every 21 days and limit the reuse of previous passwords;
- After three unsuccessful attempts to log in, the User ID is locked and the user must contact the HUD System Administrator to have the password reset; and
- Online warning messages that inform the user of the civil and criminal penalties associated with unauthorized use of the EIV system will be displayed.

In addition, PCDC will follow the following technical security requirement:

- Public Housing will not save EIV data to a computer hard drive or any other automated information system (i.e. network drive, disk or CD);
- Public Housing staff will not leave their computer unattended with EIV data displayed on the screen; and
- Public Housing staff will not log in on another user's ID.

### ***Administrative Safeguards***

The Security Officer(s) will maintain security-related records and monitor programmatic security issues. The Security Officer(s) will adhere to the following administrative safeguards:

- Ensure that all users who have access to EIV data have an Access Authorization form signed by the Director of Housing on file;
- Ensure that all users who access the EIV system have a current signed Rules of Behavior and User Agreement on file;
- Conduct quarterly reviews of all User IDs to determine if the user still has a valid need to access the EIV data; and
- Ensure the access rights are modified or revoked as appropriate.

The Public Housing Security Officer(s) will maintain the following EIV security records and forms:

- EIV Rules of Behavior and User Agreement Forms;
- EIV Access Authorization Forms;
- EIV Disposal Records List;
- EIV Security violation information;
- Key Control Logs for secure areas or filing cabinets;
- EIV Security Awareness Training Records;
- Records of internal audits to ensure that the Form HUD-9886 has been signed by each adult member of the household and is kept in the Confidential Resident File; and
- A record of all users who have approved access to EIV data including the date the access was granted and the date access was terminated.

### ***Physical Safeguards***

The purpose of physical safeguards is to provide barriers between unauthorized persons and documents containing private data.

### ***Confidential Participant Files***

All EIV data will be printed and saved in the "Confidential" participant file. Each participant file will be clearly labeled on the front cover as "Confidential". This alerts staff that this file contains EIV data that must be protected at all times when not in use.

### ***Locking File Cabinets for Confidential Files***

Even though the PCDC has a monitored office building, persons unauthorized to view EIV data, such as maintenance staff, janitorial staff, or temporary staff, have access to the office spaces. In office settings where any staff other than the staff responsible for the participant file or their supervisor has access to the office, all Confidential Participant Files will be kept in locking file cabinets. The cabinets will be locked whenever the responsible staff leaves the workspace.

### ***Hard Copy Security Violations***

PCDC will handle EIV data in such a manner that it does not become misplaced or available to unauthorized personnel. Any marked confidential participant file will contain EIV data. Therefore the file cannot be viewed by **any personnel** that are not expressly authorized (i.e. staff in charge of that file, the supervisor of the staff in charge of the file, the security officer, or the Public Housing Internal Auditor) and who do not have both an Access Authorization Form and a Rules of Behavior and User Agreement on file with the EIV Security Officer.

Viewing the EIV information of a participant outside of a staff's caseload assignment is considered a security violation for both the staff unlawfully viewing the EIV information and for the staff that left the information unattended. Unless a supervisor has specifically authorized staff to view another staff's EIV data, this is expressly prohibited.

### ***Disposal of EIV Information***

EIV data should be destroyed as soon as it has served its purpose or as prescribed by the program administrators's policy and procedures. All EIV originals and any documents created in association with their use should be shredded to prevent the reconstruction of the contents. Large amounts of shredded paper should not be allowed to accumulate in the bin. It is important that a log or register be maintained of all documents shredded or destroyed.

### ***Reporting Improper Disclosures***

Recognition, reporting and disciplinary action in response to security violations are crucial to successfully maintaining the security and privacy of the EIV system.

Security Violations may include the following:

- Disclosure of private data;
- Attempts to access unauthorized data; and
- Sharing of User IDs and passwords.

Upon discovery of a possible improper disclosure of EIV information or another security violation by a Public Housing Employee or any other person, the individual making the observation or receiving the information should contact the Security Officer(s). The PHA Security Officer(s) will document all improper disclosures in writing on a security disclosure form providing details including who was involved, what was disclosed, how the disclosure occurred, and where it occurred.

The following contacts will be made:

- The Security Officer(s) will contact and provide the Director of Public Housing the written documentation of the security violation;
- The Administrator or his designee will provide the HUD Field Office Public Housing Director with the written documentation; and
- The HUD Field Office Public Housing Director upon receipt of the documentation will make a determination regarding the referral and provision of the written documentation to the Headquarters EIV Coordinator and / or EIV Security Officer(s) for further review and follow-up action.

***Safeguards Provided by the Privacy Act***

The Privacy Act provides safeguards for individuals against invasion of privacy by requiring Federal agencies, except as otherwise provided by law or regulation to:

1. Permit individuals to know what records pertaining to them are collected, maintained, used or disseminated;
2. Allow individuals to prevent records pertaining to them, obtained for a particular purpose from being used or made available for another purpose without their consent;
3. Permit individuals to gain access to information pertaining to them, obtain a copy of all or any portions thereof, and correct or amend such records;
4. Collect, maintain, use or disseminate personally identifiable information in a manner that ensures the information is current and accurate, and that adequate safeguards are provided to prevent misuses of such information;
5. Permit exemption from the requirements of the Act only where an important public policy need exists as determined by specific statutory authority; and
6. Be subject to a civil suit for any damages that occur as a result of action that violates any individual's rights under this Act.

