

Shenae Draughn President

### **AGENDA**

REGULAR MEETING OF THE BOARD OF COMMISSIONERS HOUSING AUTHORITY OF THE CITY OF NEW HAVEN 360 ORANGE STREET NEW HAVEN CT 06511 TUESDAY, NOVEMBER 18<sup>TH</sup> 2025 at 4:00 P.M.

Join the meeting now

Meeting ID: 285 052 228 048 Passcode: Rs6K53hD

- 1. Roll Call
- **2.** Approval of the Minutes From October 21st, 2025
- 3. Bills and Communications
- 4. Public Comments (3 Minutes per Individual /15 Minutes per Group)
- **5.** President's Report

## **ACTION ITEMS**

## **FINANCE COMMITTEE:**

**NONE** 

## **P&D COMMITTEE:**

- Resolution 11-82/25-R; Authorization Of The Submission Of A Rental Assistance Demonstration Application To The U.S. Department Of Housing And Urban Development For The Conversion Of The George Crawford Manor Public Housing Development
- 2. Resolution 11-83/25-R; Resolution Ratifying, Authorizing and, to the extent necessary, Reauthorizing A Predevelopment Loan in Support of the Union Square Redevelopment Project, Including a Non-Interest-Bearing Loan to The Glendower Group, Inc. in an Amount not to Exceed One Million Five Hundred Seventy-Eight Thousand Six Hundred Dollars (\$1,578,600)

## **SERVICES COMMITTEE:**

- 3. Resolution 11-84/25-R; Resolution Authorizing The Revision Of The ECC/HANH Admission And Continued Occupancy Plan (ACOP) 2025
- **4. Resolution 11-85/25-R**; Resolution Authorizing The Revision Of The ECC/HANH Housing Choice Voucher Administrative Plan (Admin Plan) 2025

- 5. Resolution 11-86/25-R; Resolution Authorizing A Memorandum Of Understanding Between Haven's Harvest And Housing Authority Of The City Of New Haven (D/B/A Elm City Communities) To Coordinate The Rescue And Redistribution Of Surplus Food During The Period Of November 24, 2025 To December 31, 2026
- **6. Resolution 11-87/25-R**; Resolution Authorizing Award Of A Contract To The Computer Company (TCC) For A Period Of 5 Years Beginning January1, 2026 And Ending December 3, 2030 In The Not To Exceed Amount Of \$3,205,776.00 To Provide Outsourced I.T. And Infrastructure Services
- 7. Resolution 11-88/25-R; Resolution Authorizing Change Order Number Four (4) To The Contract With Ed The Treeman, LLC., Increasing The Total Not To Exceed Contract Amount By \$55,000.0.0 Bringing The Total Not To Exceed Contract Amount From \$145,000.00 To \$200,000.00, For Arborist, Tree Removal And Weed Control Services

## **ADJOURNMENT**

## MINUTES REGULAR MEETING OF THE BOARD OF COMMISSIONERS HOUSING AUTHORITY OF THE CITY OF NEW HAVEN 360 ORANGE STREET NEW HAVEN CT 06511 TUESDAY, NOVEMBER 18<sup>TH</sup>, 2025 at 4:00 P.M.

Those present included:
William Kilpatrick, Chair
Elmer Rivera, Commissioner
Danya Keene, Commissioner
Kevin Alvarez, Commissioner
Rolan Young, McCarter & English LLP
Various staff and public attendees via RingCentral

The Regular Meeting of the Board of Commissioners of the Housing Authority of New Haven was called to order at 4:06 p.m.

At Roll Call, Shenae Draughn was present in person in the boardroom along with Chairman Kilpatrick, Commissioner Rivera and Commissioner Keene.

Approval of the Minutes from the October 21st, 2025, Meeting:

Motion to approve the minutes was moved by Commissioner Keene and seconded by Commissioner Alvarez.

Aged Accounts Payable Report totaling \$ 623,080.66 (listed on page 17), this excludes paid invoices on report). This list consists of invoices that have been received and entered in the system but may noThe total of both registers is \$ 7,188,533.81

Bank Book Check Register totaling \$ 6,565,453.15 (listed on page 24). This list consists of invoices that have been paid from Oct 1-Oct 31, 2025. New Reach, Inc.(\$ 46,033) 7 months of services for McQueeney; Columbus House, Inc (\$ 10K) for four months of tenant services; City of New Haven (\$ 89,937) for Youth@work, Youth & Rec, bulk trash, fuel, & LCI services; W.B. Mason Company Inc. (\$ 103,536.67) agency-wide office supplies & HCV Furniture; AVT Construction Inc (\$ 31,636) for RAD services multiple sites; The Computer Company Inc (\$ 196,108) for IT services; LaRosa Building Group LLC (\$ 1,835,950) for Glendower McConaughy 4% & 9%; Yale Termite & Pest Elimination Corp. (\$ 30,760) various sites pest control; Southern Ct Gas (\$ 26,226) for various sites gas services. United Illuminating (\$ 134,399) for various sites electrical; Regional Water Authority (\$64,151) For agency-wide services; Anthem Blue Cross/Blue Shield (\$ 511,345) for two months of Agency-wide Medical, Dental & Vision; B&H Foto Electronis Corp (\$ 54,744) for IT equipment.

The total of both registers is \$7,188,533.81

### **Public Comments:**

Anais Nunez

## October 21st, 2025 President Report Located Here:

• President's Report

## October 21st, 2025 Resolutions Located Here:

- 10-67 HAIG Comprehensive Commercial Property Insurance RESOLUTION
- 10-68 HOUSING AUTHORITY INSURANCE GROUP General Liability Public Officials Insurance RESOLJUTION.docx
- 10-69 NERO AIR CONDITIONING RESOLUTION.doc
- <u>10-70 HCV Payment Standard Board Resolution.docx</u>
- 10-71 HCV Utility Allowance schedule 2026 RESOLUTION (1).docx
- 10-72 LIPH Utility Allowance 2025- 2026 RESOLUTION.docx
- 10-73 MAC COMPUTER CONSULTING RESOLUTION.docx
- 10-74 Engie Energy RESOLUTION.docx
- 10-75 GENERAL COUNSEL LEGAL SERVICES RESOLUTION.docx
- 10-76 MATCH MOU RESOLUTION.docx
- 10-77 Youth Without Limits 25 RESOLUTION.docx
- 10-78 Bridges of Hope Space Utilization RESOLUTION.docx
- 10-79 Home Services More Change Order # 3 RESOLUTION.docx
- <u>10-80 HDSupplyResolution Change Order Number Two (2).doc</u>
- ..\10 Oct 2025\Service\Drafts\10-81 Home Depot Resolution Change Order Number Three.docx

## ADJOURNMENT: Motion to adjourn made by Rivera seconded by Keene at 5:36PM

## **ANNUAL MEETING MINUTES:**

The Regular Meeting of the Board of Commissioners of the Housing Authority of New Haven was called to order at 4:31 p.m.

### **ACTION ITEMS**

## **ANNUAL MEETING ELECTION:**

- 1. Open Annual Meeting
- 2. Nomination of Chair
- 3. Nomination of Vice Chair
- 4. Nomination of Assistant Treasurer
- 5. Nomination of Assistant Secretary

Adjournment: 4:35PM

<sup>\*</sup>Motion to keep the positions the same by Rivera seconded by Keene\*

## **ELM CITY COMMUNITIES**

# PRESIDENT'S REPORT







## FROM THE OFFICE OF OUR PRESIDENT

As we gather today, I want to take a moment to reflect on the resilience and commitment that define our work at Elm City Communities. In a time where the political landscape can often feel uncertain, I want to emphasize our unwavering dedication to serving our residents.

Our mission remains rooted in hope. We are not just building homes; we are fostering communities and creating spaces where families can thrive. Even as we navigate challenges brought on by shifting policies, we stand ready to adapt and respond to the needs of our residents.

I am truly grateful for our leadership team, whose collaborative spirit and innovative thinking continues. Our efforts in brainstorming ideas to address negative impacts to families are invaluable as we face these challenges together. We will carry this proactive framework forward, ensuring that our commitment to our residents remains steadfast, regardless of external pressures.

Let us continue to work together with determination and optimism, always keeping the well-being of our community at the forefront of our efforts. Thank you to our team and Commissioners for your dedication and for the important work we do together.

Our team continues to work toward our strategic pillars:

- House more families (more quickly) in the highest quality housing in communities of their choice
- Support residents' ability to live their best life and achieve goals that move them toward greater housing and life choices
- Cost effective and cost-efficient delivery of services in ways that maximize impact in our community (jobs, contracting, economic development) and
- Spark policy change that creates growth in housing market especially for families in need of affordable housing
- -Let's Make Excellence A Habit!

## **CONTRACT UPDATES**

• No cost time extension to Aramark Uniform & Concessions from March 6, 2025 to March 5, 2026.

## **OPERATIONS**

**RENT COLLECTION:** HANH's rent collection for the year to date ending the month of October 2025 has been postponed due to Yardi conversion. The agency goal is 95%.

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**OCCUPANCY**: HANH's current occupancy rate for the month for October 2025 is 94.17%. The agency goal is 96.00%. Attainment of this goal remains one of the primary objectives for the Operations Department

## YTD FINANCIALS

Finance would not have any updates for the month of October. September is a fiscal year-end.\*\*\*

## COMMUNITY ECONOMIC DEVELOPENT



#1 - Celebrating 2 CARES graduates.

#2 – CED Processed over 1400 rental rebates, with Families getting an average of \$400 in return.

#3 – Bringing Breast Cancer Awareness to the Community, Wilmot and Twin Brook residents enjoyed themselves while learning about the importance of making their annual wellness checkups. For those who had not scheduled one this year, CED helped them make an appointment or confirmed that they already had one coming up. Residents proudly wore pink, enjoyed pink-themed snacks, and helped decorate the bulletin board with pink ribbons. They also participated in another fun activity making bracelets, which everyone really enjoyed!

## **PAGE | 04**

## **ELM CITY COMMUNITIES**

## PLANNING & MODERNIZATION

## **HUD Housing Related Hazards**

ECC was awarded a \$3,999,993 Housing Related Hazards grant to address the following Hazards at Scattered Sites, Essex, Crawford Manor, Wolfe: Smoke and Carbon monoxide, Radon, Mold and Vermin (high-rise buildings). Smoke and carbon monoxide detector installation is complete. Current obligation of grant funds is 100% and expenditure of funds at 92%.

- House more families (more quickly) in the highest quality housing in communities of their choice
- Support residents' ability to live their best life and achieve goals that move them toward greater housing and life choices
- Cost effective and cost-efficient delivery of services in ways that maximize impact in our community (jobs, contracting, economic development) and
- Spark policy change that creates growth in housing market especially for families in need of affordable housing

## THE GLENDOWER GROUP

## The Glendower Group

- Westville Manor
- The Authority submitted a 9% LIHTC application in November 2016 to complete the offsite component on the Rockview Phase II site and was awarded. Contract closing for Rockview Phase 2 completed in 2021 and is fully occupied.
- The Authority issued an RFQ for a Master Planner for Westville Manor site and selected a team composed of Ken Boroson Architects and Torti Gallas Planners.
- The master Planning Team held a series of meetings and charrettes in September 2018 and will completed a final recommendation to stakeholders in January 2019.
- It was determined that a Planned Development District (PDD) was the best approach to the redevelopment of the site. A PDD application was submitted to the City of New Haven in January 2019 that will include the redevelopment of 109 units on site of which 80% will be RAD replacement units and 20% unrestricted. The Board of Alders approved the PDD in April 2019.
- The project is now being modeled to determine the best method to obtain project financing for the balance of the site.

### **RAD Portfolio Award**

- The Authority received a portfolio award, inclusive of 12 developments, with 11 being completed and detailed herein. The last remaining project is Valley Townhomes which has converted to permanent financing.
- Final construction completion other than minor site work and finishing items was completed in June 2024.
- Ribbon-cutting held on June 28, 2024.
- Conversion to permanent financing completed in Sept 2025.

## **McConaughy Terrace**

- For the purpose of Financing Glendower bifurcated the redevelopment into two phases 4% and 9% Low Income Housing Tax Credit applications.
- Glendower McConaughy Terrace 4%, LLC consists of 92 affordable units and Glendower McConaughy Terrace 9%, LLC consists of 104 affordable and 26 market rate units.
- Submitted a LIHTC Hybrid application to CHFA in 2021. Application awarded funding for both the 4% and 9% phases.
- Dual Closing completed on November 28, 2023 and construction completed for all units September 2025.
- Final electrical work now underway which will be completed no later than February 2026.

### **Scattered Sites**

- Scattered site is multifamily redevelopment which includes 88 units located in the Fair Haven Heights area. The project will be redeveloped using RAD vouchers and LIHTC 4% funding.
- Submitted a 9% LIHTC application on January 12, 2022. Project was not awarded.
- The project is now being modeled to determine the best method to obtain project financing. Likely that Essex Houses will be added to the original 88 and that a 4% LIHTC model will be used.

## **ELM CITY COMMUNITIES**

## THE GLENDOWER GROUP

## 34 Level Street/The Heights at Westrock

- Submitted a HUD Section 202 Supportive Housing for the Elderly application to HUD in January 2023 and was awarded the 202 grant and associated rental subsidy in October 2023.
- The development includes 50 supportive housing units.
- DECD Brownfields award of \$999,000 received assist in clean up and removal of former nursing home.
- HUD Firm Application approval executed in May 2025 and Closing anticipated to be in the 1st quarter of 2026.

## St Luke's Apartments, Whalley Ave.

- Partnering to take over a struggling pre-development project being managed by St. Lukes Development Corp.
- Submitted a CIF application on June 30, 2023 and awarded \$7MM in CIF funds that consists of \$6MM for new construction and \$1MM for the City of New Haven infrastructure.
- The development includes 49 housing units, including 44 RAD project-based voucher units using Rebuild Restore vouchers and 5 additional LIHTC/PBV affordable units.
- Closing anticipated for the 1st quarter of 2026.

## Newhallville Development, 201 Hazel Street

- Partnering to redevelop a currently vacant site at 210 Hazel Street with Newhallville Development Corp.
- The development includes up to 63 affordable units, 50 affordable and 13 market rate.
- A CIF application is planned to be submitted in the fall 2025 round.

## Union Square/Robert T. Wolfe & Former Church Street South

- The Authority submitted a Choice Neighborhood Planning Grant application in April 2023 to complete the redevelopment of Robert T. Wolfe site and was awarded. Notice of Award occurred on September 15, 2023.
- The Draft Transformation Plan was submitted in March 2025 and reviewed by HUD. The final Transformation plan was submitted to HUD in August 2025.
- A CNI Implementation Plan application will be submitted upon announcement of the next round from HUD.
- Glendower is in the process of procuring an architect for phases 1 & 2.

### **Eastview Terrace Conversion**

- The Project's 15-year initial Low-Income Tax Credit ("LIHTC") Compliance Period ("Compliance Period") ended in December 2023 and has purchased the property outright Investor buyout completed on September 4, 2024.
- Architect and Construction Manager in-place with an anticipated closing in 1st quarter of 2026.

## **Henry Street**

- The Authority purchased 3 properties at 133, 135 and 137 Henry Street
- The Glendower Group solicited for Architects and selected Russell & Dawson as Architect and is working on As-Built drawings
- 100% Construction documents are expected to be issued by September 2025.
- Construction to begin in 2025 with a 12- month construction period.
- Completed project will contain 7 units.

## HOUSING CHOICE VOUCHER

- As of October 30, 2025, the Housing Choice Voucher (HCV) Program maintained strong overall performance with a continued focus on utilization, accuracy, and efficiency across all core functions. The agency's MTW baseline remained at 4,481 vouchers, with 4,075 leased—reflecting 99% utilization. Within special programs, utilization remained steady with VASH at 55%, Church Street South (CSS) at 70%, RAD at 90%, and PBV at 77%. Efforts are ongoing to strengthen utilization within the VASH and PBV portfolios through targeted outreach and streamlined leasing processes.
- Recertification productivity remained steady with 1,049 recerts due and 185 completed in September, resulting in a 93% year-to-date submission rate, slightly below the 95% goal. Management continues to focus on improving timeliness as staff adapt to new workflows in Yardi and Bob.ai. Quality assurance outcomes remained strong—99 intake files were reviewed with no tenant payment or income calculation errors, demonstrating the team's commitment to compliance and accuracy.
- The Intake team processed 46 new admissions, issued 112 vouchers, and managed 22 moves during the month, reflecting consistent productivity across specialists. The HCV waitlist currently includes 18,019 applicants, with 70% of families earning below 50% of the area median income, reinforcing ECC's mission to serve New Haven's most economically vulnerable residents.
- Financially, the program maintained fiscal integrity with \$60.6 million in Housing Assistance Payments and Utility Allowance Payments disbursed in September across 65,431 total transactions. Additionally, 100% of property owners are enrolled in direct deposit, ensuring timely and efficient payments.
- HQS inspections performance stood at 46% completed year-to-date, below the 95% target. The department is addressing this through staff realignment and system enhancements to improve scheduling efficiency.
- Overall, the HCV Department continues to demonstrate operational stability, strong utilization, and consistent compliance performance while strategically focusing on improving inspection completion and recertification timeliness. With technology stabilization and continued staff engagement, the program remains on track to meet ECC's FY25 performance benchmarks.



### **MEMORANDUM**

TO: Board of Commissioners

DATE: November 18, 2025

FROM: Shenae Draughn, President

RE: AUTHORIZATION OF THE SUBMISSION OF A RENTAL ASSISTANCE DEMONSTRATION

APPLICATION TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT FOR THE CONVERSION OF THE GEORGE CRAWFORD MANOR PUBLIC HOUSING DEVELOPMENT

ACTION: Recommend that the Board of Commissioners adopt Resolution Number #11-

82/25-R

TIMING: Immediately

DISCUSSION: The purpose of this memorandum is to request Board authorization for the

Housing Authority of the City of New Haven d/b/a Elm City Communities ("ECC")

to submit a Rental Assistance Demonstration (RAD) application to the U.S.

Department of Housing and Urban Development (HUD) for the George Crawford Manor development. Adoption of this resolution will allow ECC to proceed with HUD's RAD conversion process and initiate steps toward securing long-term affordability, capital reinvestment, and historic preservation for the property.

George Crawford Manor is a mixed-population development located at 90 Park Street, New Haven, CT 06511, serving elderly and non-elderly disabled residents. The property is a historic building, listed as a significant example of modernist public housing architecture, and is subject to review by the Connecticut State Historic Preservation Office (SHPO) and the National Park Service (NPS).

The building is in need of modernization to address capital needs, improve accessibility, and enhance energy efficiency while maintaining its architectural integrity. Conversion under the RAD Program will enable ECC to replace obsolete public housing subsidies with long-term Section 8 Project-Based Voucher (PBV) assistance and leverage private and public financing for substantial rehabilitation consistent with historic preservation standards.

ECC conducted four Resident Information (RIN) Meetings in compliance with HUD RAD Notice H-2019-09 / PIH-2019-23 requirements:

 Monday, October 21, 2025 – 2:00 PM and 5:00 PM (Crawford Manor and Zoom)



 Wednesday, November 13, 2025 – 1:00 PM and 4:30 PM (Crawford Manor and Zoom)

Notices were hand-delivered to all resident households and posted in conspicuous locations throughout the building. Each notice included meeting times, Zoom access information, and a dedicated phone number for questions. Residents were briefed on the RAD conversion process, tenant protections, anticipated scope of work, and the right to return after rehabilitation. Feedback was incorporated into the final application. No residents will be permanently displaced as a result of the conversion.

FISCAL IMPACT: \$0

SOURCE OF FUNDS: None

STAFF: Jimmy Miller, Executive Vice President



## HOUSING AUTHORITY OF THE CITY OF NEW HAVEN (d/b/a Elm City Communities)

## **RESOLUTION #11-82/25-R**

## AUTHORIZATION OF THE SUBMISSION OF A RENTAL ASSISTANCE DEMONSTRATION APPLICATION TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT FOR THE CONVERSION OF THE GEORGE CRAWFORD MANOR PUBLIC HOUSING DEVELOPMENT

WHEREAS, the Rental Assistance Demonstration (RAD) is authorized by the Consolidated and Further Continuing Appropriations Act of 2012 as amended by Public L. No, 113.76, Public L. No, 113-235, Public L. No, 114-113, Public L. No, 115-31, Public L. No, 115-141, Public L. No, 117-103, Public L. No, 117-103, and Public L. No, 118-42; and

WHEREAS, George Crawford Manor is a mixed-population development located at 90 Park Street, New Haven, CT 06511, serving elderly and non-elderly disabled residents. The property is a historic building, listed as a significant example of modernist public housing architecture, and is subject to review by the Connecticut State Historic Preservation Office (SHPO) and the National Park Service (NPS); and

WHEREAS, the building is in need of modernization to address capital needs, improve accessibility, and enhance energy efficiency while maintaining its architectural integrity, and conversion under the RAD Program will enable ECC to replace obsolete public housing subsidies with long-term Section 8 Project-Based Voucher (PBV) assistance and leverage private and public financing for substantial rehabilitation consistent with historic preservation standards; and

WHEREAS, ECC conducted four Resident Information (RIN) Meetings in compliance with HUD RAD Notice H-2019-09 / PIH-2019-23 requirements on Monday, October 21, 2025 – 2:00 PM and 5:00 PM (Crawford Manor and Zoom) and on Wednesday, November 13, 2025 – 1:00 PM and 4:30 PM (Crawford Manor and Zoom); and

WHEREAS, notices were hand-delivered to all resident households and posted in conspicuous locations throughout the building. Each notice included meeting times, Zoom access information, and a dedicated phone number for questions, and Residents were briefed on the RAD conversion process, tenant protections, anticipated scope of work, and the right to return after rehabilitation. Feedback was incorporated into the final application; and

WHEREAS, no residents will be permanently displaced as a result of the conversion; and

WHEREAS, the Authority is desirous of applying to HUD for the RAD conversion of up to 109 units at the George Crawford Manor Development; and

WHEREAS, pursuant to the RAD application submission requirements, a Board Approval form prescribed in the application must be executed by the authorized representative certifying the following:

- 1. that I have the requisite authority to execute this application on behalf of the owner; and
- 2. that HUD can rely upon this certification in evaluating the Application; and



- 3. that I acknowledge that I have read and understand Notice H 2019-09 PIH 2019-23, REV-4 and subsequent Supplemental Notices (the "Notice"), which describes RAD, and agree to comply with all requirements of the Program or Notice; and
- 4. that all materials submitted in association with the application are accurate, complete, and not misleading; and
- 5. that the application meets all applicable eligibility requirements for the Program set forth in the Notice; and
- 6. that the owner approves the creation of a single-asset entity of the affected project if required by the lender to facilitate financing; and
- 7. that, if selected for award, the owner will comply with the fair housing and civil rights requirements at 24 CFR 5.105(a) (general requirements) and will affirmatively further fair housing; and
- 8. that there are no debarments, suspensions, or Limited Denials of Participation in Federal programs lodged against the applicant, PHA Executive Director, Board members, or affiliates; and
- 9. that this Board Approval Form has been approved by the Board of Commissioners on the date noted below; and
- 10. that, if selected for an award, the PHA will comply with all provisions of HUD's Commitment to Enter into a HAP (CHAP), which shall indicate the HUD-approved terms and conditions for conversion of assistance or will indicate to HUD within 15 days that it is refusing the terms of the CHAP and withdrawing from RAD participation.

WHEREAS, staff requests Board authorization for the Housing Authority of the City of New Haven d/b/a Elm City Communities ("ECC") to submit a Rental Assistance Demonstration (RAD) application to the U.S. Department of Housing and Urban Development (HUD) for the George Crawford Manor development. Adoption of this resolution will allow ECC to proceed with HUD's RAD conversion process and initiate steps toward securing long-term affordability, capital reinvestment, and historic preservation for the property.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF NEW HAVEN, THAT:

- 1. The submission of a RAD application to HUD for the conversion of up to 109 units at George Crawford Manor as set forth herein above is hereby authorized and directed, and the President is hereby authorized, empowered and directed to take such action and execute such documents as necessary to accomplish the foregoing purposes; and
- 2. The President be and hereby is authorized, empowered and directed to take any and all such action necessary and appropriate to fulfill the foregoing purposes, to execute and deliver such agreements, documents and instruments and to take any and all such action ancillary, related and or/necessary action to fulfill the foregoing purposes and the purposes of this Resolution; and
- 3. This Resolution shall take effect immediately.



## [CERTIFICATION FOLLOWS]



I hereby certify that the above resolution was adopted by a majority of the Commissioners present at a meeting duly called at which a quorum was present, on November 18, 2025.

	Shenae Draughn Secretary/President	
	Date	
REVIEWED: MCCARTER & ENGLISH, LLP GENERAL COUNSEL		
Ву:		
Rolan Joni Young, Esq. A Partner		

## **RESOLUTION NO.**

TO AUTHORIZE THE SUBMISSION OF A RENTAL ASSISTANCE DEMONSTRATION APPLICATION TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT FOR THE CONVERSION OF THE GEORGE CRAWFORD MANOR PUBLIC HOUSING DEVELOPMENT

WHEREAS, the Rental Assistance Demonstration (RAD) is authorized by the Consolidated and Further Continuing Appropriations Act of 2012 as amended by Public L. No, 113.76, Public L. No, 113-235, Public L. No, 114-113, Public L. No, 115-31, Public L. No, 115-141, Public L. No, 117-103, Public L. No, 117-103, and Public L. No, 118-42

WHEREAS, the Authority is desirous of applying to HUD for the conversion of up to 109 units at the George Crawford Manor Development;

WHEREAS, pursuant to the RAD application submission requirements, a Board Approval form prescribed in the application must be executed by the authorized representative certifying the following:

- (1) that I have the requisite authority to execute this application on behalf of the owner;
- (2) that HUD can rely upon this certification in evaluating the Application;
- (3) that I acknowledge that I have read and understand Notice H 2019-09 PIH 2019-23, REV-4 and subsequent Supplemental Notices (the "Notice"), which describes RAD, and agree to comply with all requirements of the Program or Notice;
- (4) that all materials submitted in association with the application are accurate, complete, and not misleading;
- (5) that the application meets all applicable eligibility requirements for the Program set forth in the Notice;
- (6) that the owner approves the creation of a single-asset entity of the affected project if required by the lender to facilitate financing;

- (7) that, if selected for award, the owner will comply with the fair housing and civil rights requirements at 24 CFR 5.105(a) (general requirements) and will affirmatively further fair housing;
- (8) that there are no debarments, suspensions, or Limited Denials of Participation in Federal programs lodged against the applicant, PHA Executive Director, Board members, or affiliates;
- (9) that this Board Approval Form has been approved by the Board of Commissioners on the date noted below; and
- (10) that, if selected for an award, the PHA will comply with all provisions of HUD's Commitment to Enter into a HAP (CHAP), which shall indicate the HUD-approved terms and conditions for conversion of assistance or will indicate to HUD within 15 days that it is refusing the terms of the CHAP and withdrawing from RAD participation.

NOW, THEREFORE, be it resolved by the Board of Commissioners of the Housing Authority of the City of New Hven that:

- 1. The submission of a RAD application to HUD for the conversion of up to 109 units at George Crawford Manor as outlined herein above is hereby authorized, and the President is hereby authorized, empowered and directed to take such action and execute such documents as necessary to accomplish the foregoing purposes; and
- 2. The President of the Housing Authority of the City of New Haven, be and hereby is authorized, empowered and directed to act on behalf of HANH to take all such actions as are necessary or appropriate to cause to be prepared, execute and finalize, upon such terms and conditions as the President deems necessary and appropriate and in the best interests of the Authority, submission of the RAD applications contemplated hereby, and to effectuate HUD approval of same and to make corrections, general refinements and HUD requests.
- 3. This resolution shall take effect immediately.

I hereby certify that the above resolution was adopted by a majority of the Commissioners present at a meeting duly called at which a quorum was present, on November 18, 2025.

Shenae Draughn	
President	

REVIEWED BY:
MCCARTER AND ENGLISH LLP
GENERAL COUNSEL

By: _		
	Rolan Young Esq.	
	A Partner	

### **MEMORANDUM**

TO: Board of Commissioners

DATE: November 18, 2025

FROM: Shenae Draughn, President

RE: Resolution Requesting Ratification of Predevelopment Financing in Support of the Union

Square Redevelopment Project, Including a Non-Interest-Bearing Loan from Elm City Communities to The Glendower Group, Inc. in an Amount not to Exceed One Million

Five Hundred Seventy-Eight Thousand Six Hundred Dollars (\$1,578,600).

ACTION: Recommend that the Board of Commissioners adopt Resolution Number

#11-83/25-R

TIMING: Immediately

DISCUSSION: The Union Square Transformation Plan envisions the redevelopment of the former

Church Street South site and surrounding area into a vibrant, mixed-income, mixed-use neighborhood. Over a multi-phase timeline, the plan will deliver up to 2,500 new residential units, supported by retail, commercial, and community space, as well as significant open space and streetscape improvements.

The current plan calls for six phases, though these may be divided into subphases or expanded into additional phases depending on the availability of financing,

market conditions, and marketability.

For implementation, Glendower has engaged Newman Architects, Fuss & O'Neill, Pullman & Comley, et al to carry out certain predevelopment activities and to ensure planning and design align with the broader master plan.

Predevelopment funding is needed to finance these activities. ECC has received

\$1,438,054 grant from DOH to cover approved predevelopment and

infrastructure expenses.

FISCAL IMPACT: \$ 1,578,600

SOURCE OF FUNDS: \$1,438.054 from DOH and \$140,546 from ECC to be repaid

STAFF: Jimmy Miller, Executive Vice President

## Housing Authority of New Haven

## RESOLUTION #11-83/25-R

Resolution Requesting Ratification of Predevelopment Financing in Support of the Union Square Redevelopment Project, Including a Non-Interest-Bearing Loan from Elm City Communities to The Glendower Group, Inc. in an Amount not to Exceed One Million Five Hundred Seventy-Eight Thousand Six Hundred Dollars (\$1,578,600)

WHEREAS, the Housing Authority of the City of New Haven dba Elm City Communities ("ECC" or the "Authority") is undertaking, through its affiliate The Glendower Group, Inc. ("Glendower"), the Union Square Redevelopment Project, a multi-phase mixed-use redevelopment encompassing approximately eight (8) acres of land within the Hill-to-Downtown corridor adjacent to Union Station, anticipated to include up to 2,500 residential units and approximately 50,000 square feet of retail and commercial space; and

WHEREAS, ECC and Glendower are engaged in extensive predevelopment activities required to advance the Project toward financing, environmental clearance, zoning and entitlement approvals, and financial closing for Phase 1, the first of several anticipated phases; and

WHEREAS, to fund such activities, ECC desires to make available a predevelopment loan to Glendower in a total amount not to exceed One Million Five Hundred Seventy-Eight Thousand Six Hundred Dollars (\$1,578,600); and

WHEREAS, the State of Connecticut Department of Housing ("DOH") has awarded One Million Four Hundred Thirty-Eight Thousand Fifty-Four Dollars (\$1,438,054) in predevelopment funding in support of the Union Square Redevelopment Project, which shall be included as part of the total predevelopment financing reflected in the attached Exhibit A – Predevelopment Budget; and

WHEREAS, the loan from ECC to Glendower shall be non-interest-bearing, and the amount dedicated solely to Phase 1 shall be repayable from the proceeds of the Phase 1 financial closing and the DOH financing, and in any event no later than December 31, 2028, whichever occurs first; and

WHEREAS, repayment may be made from development fee, deferred developer fee, or other permissible project proceeds, and the loan shall be evidenced by a promissory note and related loan agreement, subject to review by ECC legal counsel.

## NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF NEW HAVEN, THAT:

- 1. That the Board of Commissioners hereby authorizes ECC to make a predevelopment loan to The Glendower Group, Inc. in an amount not to exceed \$1,578,600, under the terms stated above and consistent with the attached Exhibit A Predevelopment Budget.
- 2. That the Glendower expects to pay up to \$1,438,054 from funds allocated for predevelopment expenses by the Connecticut Department of Housing.
- 3. The President of Elm City Communities, or their designee, is authorized to execute the predevelopment loan agreement, promissory note, and all related documents consistent with this Resolution and the approved predevelopment budget.

4.	The President is authorized to take a out the intent of this Resolution.	ny and all actions necessary or desirable to carr
5.	This Resolution shall take effect imm	nediately upon its adoption.
	by certify that the above resolution w	ION FOLLOWS]  vas adopted by a majority of the Commissioners a quorum was present, on November 18, 2025.
	Se	nenae Draughn ecretary/President ate
GENERAL CC  By:	oni Young, Esq.	

## Exhibit A – Predevelopment Budget (Summary)

## Task

Architectural	Newnam	\$1,320,000
Site Civil Eng.	Fuss & O'Neil	\$41,667
Survey	Fuss & O'Neil	\$4,667
Part 58	Enviormed	\$1,667
Zoning Attorney	Pullman & Comley	\$12,500
Legal	McCarter/R&C	\$56,250
Fee	Various	\$12,500
Marketing/Outreach	Various	\$12,500
Marketing/Outreach	Various	\$12,500
Cost Estimator	Various	\$10,000
Phase III	Fuss & O'Neil	\$19,167
Subtotal		\$1,503,417
Contingency		\$75,171
Total		\$1,578,588

State assistance \$1,438,054.00

Use Categories: site planning, environmental, legal, architectural, engineering, financial advisory, permitting, stakeholder engagement, and project management costs.



This memorandum supports the adoption of the accompanying Board Resolution authorizing Elm City Communities ("ECC") to extend a predevelopment loan in the amount of \$1,578,588 to its affiliate, The Glendower Group, Inc. ("Glendower"), to fund critical predevelopment activities associated with the Union Square Redevelopment Project. Of the total loan amount, \$1,438,054 will be provided through the State of Connecticut Department of Housing (DOH) predevelopment award, with the remaining balance funded by ECC.

The Union Square Redevelopment Project is a multi-phase, mixed-use development initiative encompassing approximately eight (8) acres in the Hill-to-Downtown corridor adjacent to Union Station. The project is envisioned to produce up to 2,500 residential units and 50,000 square feet of commercial and retail space, reconnecting the Hill neighborhood with downtown and catalyzing equitable, transit-oriented redevelopment. ECC and Glendower, in partnership with the City of New Haven and the State of Connecticut, are advancing this redevelopment as part of a comprehensive, multi-agency effort to transform the Union Station District into a vibrant, mixed-income community that integrates housing, transportation, and economic opportunity.

The requested predevelopment funds will support the following activities necessary to advance the Union Square project toward readiness for financing and implementation:

- Preparation of a HUD Choice Neighborhoods Implementation (CNI) Grant Application, including data collection, stakeholder coordination, and submission materials;
- 2. Development of conceptual designs for Phases 1 and 2, including preliminary architectural, engineering, and infrastructure layouts to support zoning and entitlement submissions;
- Preparation of drawings and documentation required for site plan approval by the City Plan Commission;
- Completion of environmental assessments to ensure compliance with HUD Part 58 (24 CFR Part 58 – Environmental Review Procedures for Entities Assuming HUD Responsibilities); and
- 5. Marketing and outreach activities, including hosting a Union Square Investor and Lender Forum to showcase the project and promote public-private investment opportunities.

Repayment shall occur on the earlier of (a) financial closing of Union Square Phase 1, or (b) December 31, 2028

- Security: Internal loan documentation (promissory note and loan agreement)
- Repayment Source: Developer fee or other available project proceeds



## Recommendation

Staff recommends that the Board of Commissioners approve this resolution authorizing a \$1,578,588 predevelopment loan to The Glendower Group, Inc. This funding will ensure continued progress toward project approvals, HUD compliance, and successful preparation for the CNI Implementation Grant and Phase 1 financial closing.

## FISCAL IMPACT:

Funding Source State of Connecticut Department of Housing (DOH)	Amount (\$) 1,438,054	Purpose Predevelopment grant funding
Elm City Communities (ECC)	140,534	Supplemental predevelopment contribution
Total Loan to Glendower	1,578,588	Predevelopment activities described above



## Shenae Draughn, President

### **MEMORANDUM**

TO: Board of Commissioners

DATE: November 18, 2025

FROM: Shenae Draughn, President

RE: Resolution Authorizing the revision of the ECC/HANH Admission and Continued

Occupancy Plan (ACOP) 2025

ACTION: Recommend that the Board of Commissioners adopt Resolution

Number #11-84/25-R

TIMING: Immediately

DISCUSSION: On June 19, 2018, the Board of Commissioners adopted resolution # 06-

<u>63/18-S</u>, authorizing the revision of the Admissions and Occupancy

Policy (ACOP).

On January 21, 2020, the Board of Commissioners adopted resolution # <u>01-02/20-S</u>, authorizing the revision of the Admissions and Occupancy

Policy (ACOP).

On June 16, 2020, the Board of Commissioners adopted resolution # **03- 22/20-S**, authorizing an additional revision of the Admissions and

Occupancy Policy (ACOP).

On July 21, 2020, the Board of Commissioners adopted resolution # <u>07-</u>

<u>61-20-R</u>, authorizing an additional revision of the Admissions and

Occupancy Policy (ACOP).

On October 20, 2020, the Board of Commissioners adopted resolution #

10-96/20-R, authorizing an additional revision of the Admissions and

Occupancy Policy (ACOP).

On February 16, 2021, the Board of Commissioners adopted resolution #

<u>02-07/21-R</u>, authorizing an additional revision of the Admissions and

Occupancy Policy (ACOP).

On December 21, 2021, the Board of Commissioners adopted resolution #

12-102/21-R, authorizing an additional revision of the Admissions and

Occupancy Policy (ACOP).



On June 21, 2022, the Board of Commissioners adopted resolution #<u>06-</u><u>24/22R</u>, authorizing an additional revision of the Admissions and Occupancy Policy (ACOP).

On September 19, 2023, the Board of Commissioners adopted resolution #09-77/23R, authorizing an additional revision of the Admissions and Occupancy Policy (ACOP).

The ACOP is required by HUD. The purpose of the ACOP is to establish policies for carrying out the Low-Income Public Housing (LIPH) program in a manner consistent with HUD requirements and local goals and objectives contained in ECC/HANH's MTW plan. The ACOP is a supporting document to the ECC/HANH MTW plan and is available for public review as required by CFR 24 Part 903.

The policies in this ACOP have been designed to ensure compliance with the consolidated ACC and all HUD-approved applications for Low Income Public Housing (LIPH) program funding.

ECC/HANH is responsible for complying with all changes in HUD regulations pertaining to the LIPH program. If such changes conflict with this plan, HUD regulations will have precedence.

HUD regulations contain a list of what must be included in the ACOP.

The proposed revisions are updates to the following chapters.

- Chapter 2 Fair Housing and Equal Opportunity
  - o Part I: Nondiscrimination
  - Part IV: The Violence Against Women Act (VAWA)
- Chapter 4 Applications, Waiting List and Tenant Selection
  - 4-I.B. Applying for Assistance
  - o Part II: Managing the Waiting List
  - o Part III: Tenant Selection
  - o VAWA Applicant Waitlist and Transfer Preference
  - Organization of ECC/HANH's Site Based Waiting Lists
- Chapter 6 Income and Rent Determinations
  - Flat Rents/Family Choice in Rent
- Chapter 6 Income and Rent Determinations
  - 16-II.B. Flat Rents [24 CFR 960.253(b) and Notice PIH 2015-13]

A 30-day comment period occurred from September 29, 2025, to Tuesday, October 28, 2025. A public hearing for comments was held on Monday, October 27, 2025. There was one (1) public comment.

FISCAL IMPACT: None

SOURCE OF FUNDS: N/A

STAFF: Evelise Ribeiro, Director of Compliance and MTW Initiatives



## HOUSING AUTHORITY OF THE CITY OF NEW HAVEN d/b/a Elm City Communities RESOLUTION #11-84/25-R

## RESOLUTION AUTHORIZING THE REVISION OF THE ADMISSION AND CONTINUED OCCUPANCY PLAN 2025

**WHEREAS**, on June 19, 2018, the Board of Commissioners adopted resolution # <u>06-63/18-S</u>, authorizing the revision of the Admissions and Occupancy Policy (ACOP); and

**WHEREAS**, on January 21, 2020, the Board of Commissioners adopted resolution # <u>01-02/20-S</u> authorizing the revision of the Admissions and Occupancy Policy (ACOP); and

**WHEREAS**, on June 16, 2020, the Board of Commissioners adopted resolution # <u>03-22/20-S</u>, authorizing an additional revision of the Admissions and Occupancy Policy (ACOP; and

**WHEREAS**, on July 21, 2020, the Board of Commissioners adopted resolution # <u>07-61-20-R</u> authorizing an additional revision of the Admissions and Occupancy Policy (ACOP); and

**WHEREAS**, on October 20, 2020, the Board of Commissioners adopted resolution # 10-96/20-R, authorizing an additional revision of the Admissions and Occupancy Policy (ACOP); and

**WHEREAS**, on February 16, 2021, the Board of Commissioners adopted resolution # <u>02-07/21-R</u>, authorizing an additional revision of the Admissions and Occupancy Policy (ACOP); and

**WHEREAS**, on December 21, 2021, the Board of Commissioners adopted resolution # <u>12-102/21-</u> **R**, authorizing an additional revision of the Admissions and Occupancy Policy (ACOP); and

**WHEREAS**, on June 21, 2022, the Board of Commissioners adopted resolution # <u>12-102/21-R</u>, authorizing an additional revision of the Admissions and Occupancy Policy (ACOP); and

**WHEREAS**, on September 19, 2023, the Board of Commissioners adopted resolution #**09-77/23R**, authorizing an additional revision of the Admissions and Occupancy Policy (ACOP).

**WHEREAS**, the ACOP is required by HUD and the purpose of the ACOP is to establish policies for carrying out the Low-Income Public Housing (LIPH) program in a manner consistent with HUD requirements and local goals and objectives contained in ECC/HANH's MTW plan; and

WHEREAS, the revisions are updates to the following chapters:

- Chapter 2 Fair Housing and Equal Opportunity
- Chapter 4 Applications, Waiting List and Tenant Selection
- Chapter 6-Income and Rent Determinations
- Chapter 16 Program Administration



NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF NEW HAVEN, THAT:

- 1. The revision of the ACOP as set forth in the Recitals hereinabove be and hereby is authorized and directed; and
- 2. The President be and hereby is authorized, empowered and directed to take any and all such action necessary and appropriate to fulfill the foregoing purposes, and to execute and deliver such documents and instruments as necessary to fulfill the foregoing purposes, and to take any and all such action ancillary, related and or/necessary action to fulfill the foregoing purposes and the purposes of this Resolution; and
- 3. This Resolution shall take effect immediately.

I hereby certify that the above resolution was adopted by a majority of the Commissioners present at a meeting duly called at which a quorum was present, on November 18, 2025.

	Shenae Draughn Secretary/President
	Date
REVIEWED: MCCARTER & ENGLISH, LLP GENERAL COUNSEL	
By: Rolan Joni Young, Esq. A Partner	

ADMIN				
PLAN				
	0114 DZED 114145	0.000.00	D. 0.5	00444545
CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT
	FAIR HOUSING AND EQUAL		<b>D</b> . <b>Q</b> Q	Housing Provisions of the Violence Against Women Act (VAWA)
2	OPPORTUNITY	PART I: NONDISCRIMINATION  2-II.E. Approval/Denial of a Requested	Page 2-2	Reauthorization Act of 2022
2	FAIR HOUSING AND EQUAL OPPORTUNITY	Accommodation	page 2-8	
	FAIR HOUSING AND EQUAL	PART IV: THE VIOLENCE AGAINST WOMEN	puge 2-0	Added the language: for the VAWA Act of 2013 and
2	OPPORTUNITY	ACT (VAWA)	page 2-14 to 2-17	reauthorization of 2022
_		, ,	page 2 11 to 2 17	
				Added language: An
				otherwise eligible youth who has attained at least 18 years of age
				and not more than 24 years of age and who has left foster care, or
				will leave foster care within 90 days, in accordance with a
				transition plan described in section 475(5)(H) of the Social
		PART I: DEFINITIONS OF FAMILY AND		Security Act (42 U.S.C. 675(5)(H)), and is homeless or is at risk of
3	ELIGIBILITY	HOUSEHOLD MEMBERS	page 3-2	becoming homeless at age 16 or older;
				Added Language: ECC/HANH
				Policy A remaining family
				member is a family member who remains in the assisted
				household when the Head of Household is no longer associated
				with the household. To be considered a remaining family member,
				the person must be approved by ECC/HANH Voucher Program to
				be a member of the household at least 60 days prior to the
				dissolution of the family, death of the Head of Household, or
				departure of the Head of Household. Household members such
				as live-in aides, foster children, and foster adults do not qualify as
				remaining members of a family. If dependents are the only
				"remaining members of a tenant family" and there is no family
				member able to assume the responsibilities of the head of
		PART I: DEFINITIONS OF FAMILY AND		household, see Chapter 6, Section 6-I.B, for the policy on
3	ELIGIBILITY	HOUSEHOLD MEMBERS	page 3-4	"Caretakers for a Child."

ADMIN				
PLAN CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT
3	ELIGIBILITY	PART I: DEFINITIONS OF FAMILY AND HOUSEHOLD MEMBERS	page 3-7	Added language: ECC/HANH Policy Foster adult is a member of the household who is 18 years of age or older and meets the definition of a foster adult under state law. In general, a foster adult is a person who is 18 years of age or older, is unable to live independently due to a debilitating physical or mental condition, and condition and is placed with the family by an authorized placement agency or by judgment, decree, or other order of any court of competent jurisdiction.
				Added language: A
				foster child or foster adult may be allowed to reside in the unit if their presence would not result in a violation of space standards as described in Section 8-I.F. of this policy. Children that are
3	ELIGIBILITY	PART I: DEFINITIONS OF FAMILY AND HOUSEHOLD MEMBERS	page 3-8	temporarily absent from the home as a result of placement in foster care are discussed in Section 3-I.L.
3	LEGIDIETT	TIOOSETIOED WILWIDERS	page 3-0	loster care are discussed in Section 5-1.E.
3	ELIGIBILITY	PART I: DEFINITIONS OF FAMILY AND HOUSEHOLD MEMBERS	page 3-10	Added language:  family's request for a live-in aide must be made either orally or in writing. ECC will verify the need for a live-in aide from a reliable, knowledgeable professional, such as a doctor, social worker, or case worker, unless the disability-related need is apparent or known to ECC/HANH. For continued approval, the family may be required to submit a new, written request-subject to ECC/HANH verification-at each biennial/triennial reexamination.
-			1.0	Added language: Using
		PART I: DEFINITIONS OF FAMILY AND		Income Limits for Eligibility A low- income family is eligible for assistance under VASH [FR Notice
3	ELIGIBILITY	HOUSEHOLD MEMBERS	page 3-12	8/13/24].

ADMIN				
PLAN CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT
3	ELIGIBILITY	PART II: BASIC ELIGIBILITY CRITERIA	page 3-16	Removed language: In addition, each participant who has not previously disclosed an SSN, has previously disclosed an SSN that HUD or the SSA determined was invalid, or has been issued a new SSN must submit their complete and accurate SSN and the documentation required to verify the SSN at the time of the next interim or annual reexamination or recertification. Participants age 62 or older as of January 31, 2010, whose determination of eligibility was begun before January 31, 2010, are exempt from this requirement and remain exempt even if they move to a new assisted unit.
3	ELIGIBILITY	PART II: BASIC ELIGIBILITY CRITERIA	page 3-22	Added language: EIV Income Reports For each new admission, ECC/HANH is required to review income information in EIV to confirm and validate family reported income within 120 days after the admission information is transmitted to HUD. ECC/HANH must print and maintain copies of the reports in the tenant file and resolve any discrepancies with the family
				Added language: First, assistance may not be provided to any family if the family's net assets exceed the HUD published asset limitation amount (adjusted annually by HUD). •  This amount is listed in HUD's current year Inflation-Adjusted Values tables. ECC/HANH does not have the discretion not to enforce or provide limited enforcement of the asset limitation at
3	ELIGIBILITY	PART II: BASIC ELIGIBILITY CRITERIA	page 3-24, 3-25	admission.

ADMIN				
PLAN CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT
				331.112.111
				Added language: ECC/HANH Policy In general,
				Policy In general, ECC/HANH defines a geographic hardship to include, when a
				family members' work, school, health care provider, or other
				necessary service is located an unreasonable distance from the
				real property or there is a lack of adequate transportation options
				for the family to access work, school, health care, or other necessary services. ECC/HANH will consider circumstantial
				details a family faces when determining whether a geographic
3	ELIGIBILITY	PART II: BASIC ELIGIBILITY CRITERIA	page 3-26	hardship is present.
				Added language: A one-
				step process will be used when it is expected that a family will be
				selected from the waiting list within 60 days of the date of application. At application, the family must provide all information
				necessary to establish family eligibility and level of assistance. A
				two-step process will be used when it is expected that a family
				will not be selected from the waiting list for at least 60 days from
				the date of application. Under the two-step application process, ECC/HANH initially will require families to provide only the
				information needed to make an initial assessment of the family's
				eligibility, and to determine the family's placement on the waiting
				list. The family will be required to provide all information
	APPLICATIONS, WAITING LIST			necessary to establish family eligibility and level of assistance
4	AND TENANT SELECTION	PART I: THE APPLICATION PROCESS	page 4-3	needed when the family is selected from the waiting list.
				Added language: The
	APPLICATIONS, WAITING LIST			applicant may request pick up an application form at the agency
4	AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	page 4-3	offices or to have the application mailed to them

ADMIN PLAN				
CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	page 4-6	Added language:  ECC/HANH will maintain a single waiting list for the standard HCV program. ECC may maintain separate site-based waitlists for each Rental Assistance Demonstration (RAD) project.
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	page 4-7	Add language: ECC may maintain a separate site-based waitlist for each RAD project.
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	pages 4-8	Add language: Reopening the Waiting ECC/HANH will announce the reopening of the waiting list at least 10 business days prior to the date applications will first be accepted. If the list is only being reopened for certain categories of families, this information will be contained in the notice. The notice will specify where, when, and how applications are to be received.
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	page 4-9	Add language: Preference hierarchy Displaced by Gov't Action; Displacement as the result of ECC/HANH planned development/demolition/disposition activity, including from ECC/HANH buildings condemned for health and safety reasons, which would require the family to relocate for more than 3-6 months. This also includes relocation from ECC/HANH public housing units undergoing demolition/disposition, if such action is under a Uniform Relocation Act (URA).
				Add language: Preference hierarchy ECC - Reasonable Accommodation The reasonable accommodation has been approved via the ECC/HANH Reasonable process. This
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	page 4-9	includes ECC/HANH LIHTC, PBV and RAD/PBV units managed by 3rd party entities

ADMIN PLAN CHAPTER	CHAPTER NAME	SECTION	PAGE	COMN	1ENT	
OHAI IER	OHAI TERRITATIE	OESTION	I AGE	OOFIFICINI		
	APPLICATIONS, WAITING LIST			Add language: hierarchy An individual or family currently residithat are in circumstances that presente health or safety, and where Housing Coprimary mechanism for remedying the households in other housing emergent limited number of admissions each your preference category, based on vouch circumstance cases require submission applicant or advocate along with documents.	t an imminent risk to their life, choice Voucher assistance is the emergency situation and/or cy circumstances. Only a very ear will be made under this er availability. Special on of a written petition by the umentation of the special	
4	AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	page 4-10	circumstance and must have the written approval of the President.		
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	page 4-10	Add language: hierarchy Health and Safety Dwelling Currently residing in an ECC/HANH properties of the extent that contain hazardous to life, health, or safety of the another public housing unit is not avail cannot be made within a reasonable the needs of the family. At the President's	ditions are created which are he occupants and the transfer to ilable, where necessary repairs ime, or a unit does not meet the	
	APPLICATIONS, WAITING LIST			Add language: hierarchy For individuals and families who meet and are direct referrals from the Coor RAD/PBV or project-based (PBV) deverequirements. This preference may a	dinated Access Network (CAN) for clopments with homeless	
4	AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	page 4-10	vouchers TBVs, per the MOU with the		

ADMIN PLAN CHAPTER	CHAPTER NAME	SECTION	PAGE	COI	MMENT
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	page 4-10	Add language: hierarchy Supportive Housing and Homeless as separate waiting lists in the ECC	Preference Homeless s are preferences but are established C/HANH Wait List systems.
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	page 4-12	Add language: hierarchy Supportive Housing and Homeless as separate waiting lists in the ECC	Preference Homeless s are preferences but are established C/HANH Wait List systems.

ADMIN PLAN	CHARTER NAME	CECTION	DAGE	COMMENT
CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT
4	APPLICATIONS, WAITING LIST	PART II: MANAGING THE WAITING LIST	page 4-17	Add language:  family is on the waiting list, the family must inform ECC/HANH of changes in family size or composition, preference status, or contact information, including current residence, mailing address, email address and phone number.  The changes must be submitted in writing via the ECC/HANH applicant portal or via in person, by mail or by electronic methods such as email. Changes in an applicant's circumstances while on the waiting list may affect the family's qualification for a particular bedroom size or entitlement to a preference. When an applicant reports a change that affects their placement on the waiting list, the waiting list will be updated accordingly.  This may occur when applicants on the waiting list, who did not qualify for any preference when they initially applied, experience a change in circumstances that later qualifies them for a preference. The reverse may also occur. If preference status changes, applicants retain their original date and time of application or application number. If ECC/HANH determines that the applicant does now qualify for a preference, they will be moved up the waiting list in accordance with their preference(s) and their date and time of application/application number and will be informed in writing of how the change in status has affected their position on the waiting list.
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	page 4-13	Add language Purging the Waiting List The primary goal in purging a waiting list is to obtain current information on interested applicants and to remove applicants who are no longer interested in participating in the HCV program.

ADMIN					
PLAN					
CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT	
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	page 4-19	Add language Waiting List purging a waiting list is to obtain current infor applicants and to remove applicants who are in participating in the HCV program.	
4	APPLICATIONS, WAITING LIST	PART II: MANAGING THE WAITING LIST	page 4-22	Add language Rental Assistance Program Direct Rental Assistance (DRA) program wou to participating HCV families, rather than to la would then use the funds to pay their full rent model, being explored by the U.S. Departmer Urban Development (HUD), aims to streamlir families more autonomy, and potentially redu burdens and market pressures that deter lan participating in the traditional HCV program	andlords. The family t to the landlord. This nt of Housing and ne the program, give uce administrative
	APPLICATIONS, WAITING LIST		P050 : 22	Add language	condemned for ire the family to includes relocation toing
4	AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	page 4-20	Relocation Act (URA).	

ADMIN PLAN				
CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT
				Add language ECC – Crime and Safety For individuals or families currently residing in an ECC/HANH public housing unit, who are in a situation involving crime and safety
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	page 4-21	where ECC/HANH is unable to accommodate the need through the transfer to another ECC/HANH public housing or RAD/PBV or PBV unit.
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	page 4-22	Add language Special Circumstance Vouchers Households are in circumstances that present an imminent risk to their life, health or safety, and where Housing Choice Voucher assistance is the primary mechanism for remedying the emergency situation and/or households in other housing emergency circumstances. Approved by the President.
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	page 4-22	
5	BRIEFINGS AND VOUCHER ISSUANCE	PART I: BRIEFINGS AND FAMILY OBLIGATIONS	page 5-1	Add language ECC/HANH must take reasonable steps to ensure meaningful access by persons with Limited English proficiency
5	BRIEFINGS AND VOUCHER ISSUANCE	PART I: BRIEFINGS AND FAMILY OBLIGATIONS	page 5-3 to 5-4	Add language Where the family can lease a unit, including renting a unit inside or outside ECC/HANH's jurisdiction; and any information on selecting a unit that HUD provides.

ADMIN PLAN CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT
5	BRIEFINGS AND VOUCHER ISSUANCE	PART I: BRIEFINGS AND FAMILY OBLIGATIONS	page 5-4 to 5-5	Add language ECC/HANH may not discourage the family from choosing to live anywhere in the ECC/HANH's jurisdiction or outside the ECC/HANH's jurisdiction under portability, unless otherwise expressly authorized by statute, regulation, PIH Notice, or court order. ECC/HANH must take appropriate steps to ensure effective communication in accordance with 24 CFR 8.6 and 28 CFR part 35, subpart E, and must provide information on the reasonable accommodation process.
5	BRIEFINGS AND VOUCHER ISSUANCE	PART I: BRIEFINGS AND FAMILY OBLIGATIONS	page 5-5	Add language The ECC/HANH subsidy standards and when ECC/HANH will consider granting exceptions as allowed by 24 CFR 982.404(b)(8), and when exceptions are required as a reasonable accommodation for persons with disabilities under Section 504, the Fair Housing Act, or the Americans with Disabilities Act (ADA).
5	BRIEFINGS AND VOUCHER	PART I: BRIEFINGS AND FAMILY OBLIGATIONS	page 5-5	Add language Information on federal, state and local equal opportunity laws the contact information for the Section 504 coordinator and a copy of the housing discrimination complaint form and information on how to request a reasonable accommodation or modification (including information on requesting exception payment standards as a reasonable accommodation) under Section 504, the Fair Housing Act, or the Americans with Disabilities Act (ADA).

ADMIN PLAN CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT
5	BRIEFINGS AND VOUCHER	PART I: BRIEFINGS AND FAMILY OBLIGATIONS	page 5-5	Add language  An explanation of the advantages of moving to an area that does not have a high concentration of low-income families. which may include access to accessible and high quality housing, transit, employment opportunities, educational opportunities, recreational facilities, public safety stations, retail services, and health services
5	BRIEFINGS AND VOUCHER ISSUANCE	PART I: BRIEFINGS AND FAMILY OBLIGATIONS	page 5-6	Add language The grounds on which the PHA may terminate assistance for a participant family because of family action or failure to act.  Requirements for notifying the PHA of any changes in income or family composition
5	BRIEFINGS AND VOUCHER ISSUANCE	PART I: BRIEFINGS AND FAMILY OBLIGATIONS	page 5-7	Add language The family may be held responsible for a breach of housing quality standards caused by the family's failure to pay tenant-provided utilities or appliances, or damages to the dwelling unit or premises beyond ordinary wear and tear caused by any member of the household or guest.
5	BRIEFINGS AND VOUCHER ISSUANCE	PART II: SUBSIDY STANDARDS AND VOUCHER ISSUANCE	page 5-13	Add language  ECC/HANH must issue the family a voucher within 60 days of determining the family eligible [24 CFR 982.201(e)]. The income documentation must be dated within 120 days of when it was received by ECC/HANH. However, for fixed-income sources, including Social Security benefits, the documentation must be dated within the appropriate benefit year.
6	INCOME AND SUBSIDY DETERMINATIONS	PART I: ANNUAL INCOME	page 6-29	Add language: Summary of Income Included and Excluded by Person

ADMIN PLAN CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT	
	INCOME AND SUBSIDY DETERMINATIONS	PART I: ANNUAL INCOME	page 6-29	Add language: specifically excluded by the regulations, the members approved to live in the unit will be of	counted, even if the
	VERIFICATION	Part II: VERIFYING FAMILY INFORMATION	7.404.7.04		splaced by ECC- Reasonable al Circumstances

ADMIN				
PLAN	CHAPTER NAME	CECTION	DACE	COMMENT
CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT
	HOUSING QUALITY STANDARDS AND RENT			Add language Certification Process The following section outlines the self-certification process for inspections when a unit has failed non-life safety HQS violations only. In these instances, it is the responsibility of the Landlord and the Tenant(s) to provide the ECC/HANH and/or it's designee with the required self-certification documentation within the repair period confirming that the non-life safety repairs have been completed. Landlords /Tenants have 30 days from date of letter to correct deficiencies send submit self-certification to LCI. If LCI does not receive the self-certification within 30 days, the inspection will be considered to have failed a second time and will go into abatement, the 1st day of the following month (Self Certification – 2nd Fail Abatement). LCI shall send out Failure to Receive Certification Notice (Final Fail Notice) no more than 15 days after original Non-Life Safety Fail Notice sent to Owner/Tenant if not received. If LCI does not receive the self- certification within 30 days from the date of the original HQS Failed Inspection Letter, LCI will process Non-Life-Safety Self Certification Final Fail Termination in Elite. The HAP contract will be terminated and the Tenant will need to move or can remain in
	REASONABLENESS			the unit if the Landlord/Tenant agree to a new Lease and HAP
8	DETERMINATIONS	PART II: THE INSPECTION PROCESS	page 8-13	contract and Initial inspection.
		PART I: BI/TRIENNIAL REEXAMINATIONS		Add language If the family moves to a new unit, ECC/HANH will perform a new annual reexamination. ECC/HANH also may schedule an annual reexamination for completion prior to the anniversary date for
11	REEXAMINATIONS	[24 CFR 982.516]	Page 11-2	administrative purposes

PLAN CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT
				Add language Biennial
				Reexaminations Families
				undergoing a biennial reexamination will be required to
				participate in a face-to-face reexamination interview, or by <b>online</b>
				portal which must be attended by all adult household members. If
				the head of household, spouse, or cohead are unable to attend,
		PART I: BI/TRIENNIAL REEXAMINATIONS		the appointment will be rescheduled. If participation in an in-
11	REEXAMINATIONS	[24 CFR 982.516]	Page 11-2	person interview poses a
				Add language For
				families undergoing a triennial reexamination, the reexaminations
				will be conducted in person, online portal or by mail. Notification
				of the reexamination will be sent by first-class mail and will inform
		PART I: BI/TRIENNIAL REEXAMINATIONS		the family of the information and documentation that must be
11	REEXAMINATIONS	[24 CFR 982.516]	Page 11-3	provided to ECC/HANH, and the
			. 460 22 0	provided to 2007. Illustration
				Add language ECC/HANH
				may use 3rd party technology platforms, such as Bob A.I., to
				gather information for the processing of new admission, annual or
	PROGRAM ADMINISTRATION			interim recertifications. ECC/HANH will comply with all data
				sharing practices, security protocols and consent and data usage.
				ECC/HANH will also comply with HUD, and federal privacy
				regulations. ECC/HANH will maintain Memorandum of
				Understandings (MOU) with any and all 3rd party technology
				platforms certifying compliance with PIH Notice 2015-06, which
				outlines the requirements for protecting Personally Identifiable
16		PART VI: RECORD KEEPING	Page 16-35	Information (PII) and Sensitive Personally Identifiable Information.

ADMIN PLAN CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT
	MIXED FINANCE DEVELOPMENTS INCLUDING RENTAL ASSISTANCE DEMONSTRATION/PROJECT- BASED VOUCHER (RAD/PBV)			
		INTRODUCTION		Add language  units assisted under the Housing Choice Voucher (HCV) or Project-Based Voucher (PBV) program that are located in a property also financed with Low-Income Housing Tax Credits (LIHTC),  ECC/HANH will ensure that income eligibility is determined in accordance with HUD regulations at 24 CFR \$5.609 (Annual Income). To promote consistency and minimize administrative burden, ECC will accept the owner's income calculation for the LIHTC program only if the owner uses the same definition of annual income as HUD's Part 5, including all required inclusions and exclusions as outlined in HUD Handbook 4350.3 REV-1, Chapter 5. The owner must provide complete and current supporting documentation to the PHA for review and verification. ECC will verify all information in accordance with HUD's verification hierarchy, including mandatory use of the Enterprise Income Verification (EIV) system, and will make a final income
19	SECTION III - ELIGIBILITY		Page 19-17	eligibility determination.

ADMIN PLAN CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT
OHAI ILI	OHAI TERRIAME	JEOHON	I AOL	OOMINER
		INTRODUCTION		Add language  initial eligibility, gross annual income will be compared to the applicable HCV income limits in effect at the time of admission. ECC will not use adjusted income for determining income eligibility. Once eligibility is determined, ECC will calculate the family's adjusted income per 24 CFR \$5.611 to determine the family's share of rent and the housing assistance payment. This policy ensures compliance with both IRS Section 42(g) income requirements and HUD's Part 5 definition for HCV/PBV
19	SECTION III - ELIGIBILITY		Page 19-17	assistance.
19	SECTION IV - APPLICATIONS, WAITING LIST, TENANT SELECTION AND TRANSFER POLICY	INTRODUCTION	Page 19-26	Add language ECC/HANH  Policy ECC has chosen to maintain a separate site-based waiting list for each RAD project.
19	SECTION IV - APPLICATIONS, WAITING LIST, TENANT SELECTION AND TRANSFER POLICY	PART I: THE APPLICATION PROCESS	Page 19-26	Add language The site-based waiting list for each PBV RAD development shall be established in accordance with the tenant selection program for that project.
19	SECTION IV - APPLICATIONS, WAITING LIST, TENANT SELECTION AND TRANSFER POLICY	PART II: MANAGING THE WAITING LIST	Page 19-28	Add language ECC-HANH currently has one TBV wait list for use by the standard PBV and a separate waitlist for each PBV RAD developments. Once the TBV list is exhausted each development will maintain a site-based waiting list. Applications for assistance will be processed by the Management Agent responsible for each development.
19	SECTION IV - APPLICATIONS, WAITING LIST, TENANT SELECTION AND TRANSFER POLICY	PART II: MANAGING THE WAITING LIST	Page 19-28	Add language At the time of the approval of the RAD Conversion Commitment (RCC) the waitlist for each site based RAD development shall be established per the tenant selection plan for that project.

ADMIN PLAN CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT
19	SECTION IV - APPLICATIONS, WAITING LIST, TENANT SELECTION AND TRANSFER POLICY	PART II: MANAGING THE WAITING LIST	Page 19-28, 19-29	Add language the Waiting List been closed, it cannot be reopened until ECC/HANH publishes a notice in local newspapers of general circulation, minority media, and other suitable media outlets. The notice must comply with HUD fair housing requirements and must specify who may apply, and where and when applications will be received.
19	SECTION IV - APPLICATIONS, WAITING LIST, TENANT SELECTION AND TRANSFER POLICY	PART II: MANAGING THE WAITING LIST	Page 19-28, 19-29	Add language: Preference hierarchy Displaced by Gov't Action; Displacement as the result of ECC/HANH planned development/demolition/disposition activity, including from ECC/HANH buildings condemned for health and safety reasons, which would require the family to relocate for more than 3-6 months. This also includes relocation from ECC/HANH public housing units undergoing demolition/disposition, if such action is under a Uniform Relocation Act (URA).
19	SECTION IV - APPLICATIONS, WAITING LIST, TENANT SELECTION AND TRANSFER POLICY	PART II: MANAGING THE WAITING LIST	Page 19-32, 19-33	Add language Purging the Waiting List The primary goal in purging a waiting list is to obtain current information on interested applicants and to remove applicants who are no longer interested in participating in the HCV program.

ADMIN PLAN CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT
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	SECTION IV - APPLICATIONS, WAITING LIST, TENANT SELECTION AND TRANSFER POLICY	PART III: SELECTION FOR HCV ASSISTANCE	page 19-34	Add language:  who will occupy units with standard PBV must be selected according to the corresponding Admission and Continued Occupancy Plan (ACOP) and/or Housing Choice Voucher Administrative Plan (Admin Plan) for each development.  Applicants for PBV/RAD assistance with be selected in accordance with the Admin Plan and the Tenant Selection Plan for each RAD PBV development.
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	SECTION IV - APPLICATIONS, WAITING LIST, TENANT SELECTION AND TRANSFER POLICY	PART III: SELECTION FOR HCV ASSISTANCE	page 19-34	Add language Local Preferences [24 CFR 982.207; HCV p. 4-16] ECC/HANH is permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits ECC/HANH to establish other local preferences, at its discretion. Any local preferences established must be consistent with the ECC/HANH Moving to Work Annual Plan and the City of New Haven's Consolidated Plan and must be based on local housing needs and priorities that can be documented by generally accepted data sources.
	SECTION IV - APPLICATIONS, WAITING LIST, TENANT SELECTION AND TRANSFER POLICY	PART III: SELECTION FOR HCV ASSISTANCE	page 19-34	Add language Each RAD/ PBV OR pbv site shall maintain a site-based waiting list. Returning residents and applicants will be selection from the waitlist per the Tenant Selection Plan for each RAD/PBV or PBV development.
19	SECTION VI - INCOME AND SUBSIDY DETERMINATIONS	PART III: CALCULATING FAMILY SHARE AND ECC/HANH SUBSIDY	page 19-73	Add language ECC will use TAC credit calculation to determine income at new admission to the program

ADMIN PLAN CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT
	SECTION XI - REEXAMINATIONS	PART I: BI/TRIENNIAL REXAMINATION [24 CFR 982.526]	page 19-101	Add language: For LIHTC families that also have subsidies. They will recertify on an Annual/Biennial schedule in alignment with the HCV program.

ACOP	ACOP					
CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT		
2	FAIR HOUSING AND EQUAL OPPORTUNITY	PART I: NONDISCRIMINATION	page 2-2	Added Language: Housing Provisions of the Violence Against Women Act (VAWA) Reauthorization Act of 2022		
	FAIR HOUSING AND EQUAL	PART IV: THE VIOLENCE AGAINST	pu <sub>6</sub> c 2 2	Added language: for the		
2	OPPORTUNITY	WOMEN ACT (VAWA)	page 2-18 to 2-21	VAWA Act of 2013 and reauthorization of 2022		
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	4-I.B. APPLYING FOR ASSISTANCE	page 4-2	Added language ECC/HANH will maintain four (4) community waiting lists for the LIPH program.  •Family •Elderly/Disabled  •Scattered Site (External Applicants) •Accessible (UFAS/ADA compliant)) This list includes access to all Accessible (ADA compliant) units in ECC/HANH's portfolio, including LIHTC and 3rd party sites		
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	4-I.B. APPLYING FOR ASSISTANCE	page 4-2	Added language  apply for the wait list through the ECC/HANH Applicant portal at https://ecc.myhousing.com. If the The applicant may request pick up an application form at the agency offices or to have the application mailed to them, needs a reasonable accommodation to complete the pre-application, the applicant may contact the Reasonable Accommodation Manager. Application forms can also be obtained at the ECC/HANH website at www.elmcitycommunities.org or United Way's 211 Info line at http://www.cthcvp.org.		
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	pages 4-5	Added language  adopt one community-wide waiting list or site-based waiting lists, as long as the list(s) is consistent with all applicable civil rights and fair housing laws and regulations and public housing program requirements. [24 CFR 903.7(b)(2)ECC/HANH may also merge its LIPH waiting list with its waiting list(s) for admission to another assisted housing program, including a federal or local program. For example, ECC/HANH can merge its HCV waiting list with its project-based voucher program, moderate rehabilitation program and/or public housing waiting list. When admitting an applicant family, admission for each federal program is subject to the federal regulations for that program. (HUD Public Housing Occupancy Guidebook)]		

ACOP					
CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT	
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	pages 4-5 - 4-6	Added language  Policy  ECC/HANH will maintain the following community-wide waiting lists for its developments:  Family  Elderly/Disabled  Scattered Site (External Applicants)  (UFAS/ADA compliant)) This list includes access to all Accessible (ADA compliant) units in ECC/HANH's portfolio, including LIHTC and 3rd party sites ECC/HANH will also maintain waiting lists for any special programs. Within the list, ECC/HANH will designate subparts to easily identify who should be offered the next available unit (i.e., mixed populations, general occupancy, unit size, and accessible units). ECC/HANH may also merge the public housing waiting list with the waiting list for another program that ECC/HANH operates.  ECC/HANH will assign families on the waiting list according to the bedroom size for which a family qualifies as established in its occupancy standards. Families may request to be placed on the waiting list for a unit size smaller than designated by the occupancy guidelines (as long as the unit is not overcrowded according to ECC/HANH standards and local codes). However, in these cases, the family must agree not to request a transfer for two years after admission, unless they have a change in family size or composition. Placement on the waiting list does not indicate that the family is, in fact, eligible for admission. When the family is selected from the waiting list, ECC/HANH will verify any preference(s) claimed and determine eligibility and suitability for admission to the program.	
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	page 4-9	Add language: Preference hierarchy Displaced by Gov't Action; Displacement as the result of ECC/HANH planned development/demolition/disposition activity, including from ECC/HANH buildings condemned for health and safety reasons, which would require the family to relocate for more than 3-6 months. This also includes relocation from ECC/HANH public housing units undergoing demolition/disposition, if such action is under a Uniform Relocation Act (URA).	

ACOP				
CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART II: MANAGING THE WAITING LIST	page 4-11	Add language Purging the  Waiting List The primary goal in purging a  waiting list is to obtain current information on interested applicants and to remove applicants who are no longer interested in participating in the LIPH program.
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART III: TENANT SELECTION	pages <b>4-1</b> 5	Add language: hierarchy Displaced by Gov't Action; Displacement as the result of ECC/HANH planned development/demolition/disposition activity, including from ECC/HANH buildings condemned for health and safety reasons, which would require the family to relocate for more than 3-6 months. This also includes relocation from ECC/HANH public housing units undergoing demolition/disposition, if such action is under a Uniform Relocation Act (URA).
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART III: TENANT SELECTION	pages 4-15	Added language: Family Developments – Developments designated for work able families (non- elderly/disabled).
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	PART III: TENANT SELECTION	pages 4-17	Added language:  Under the Community Reentry program, ECC/HANH partners with the City of New Haven to house individuals/families who have reentered society after completing a prison sentence. These individual/families receive services with the City Department and ECC/HANH provides the housing. ECC/HANH will allow individuals looking to be added to a current ECC/HANH household under the Family Reunification program. Certain criteria of the criminal background check may be waived with the exception of the mandatory HUD denials.
4	APPLICATIONS, WAITING LIST AND TENANT SELECTION	VAWA APPLICANT WAITLIST AND TRANSFER WAITLIST PREFERENCE	page 4-28	Added language: VAWA APPLICANT WAITLIST AND TRANSFER WAITLIST PREFERENCE The VAWA Final Rule states that PHAs may establish a preference for victims of dating violence, sexual assault, and stalking, in addition to domestic violence. 24 CFR 960.206(b)(4)
16	PROGRAM Administration	16-II.B. FLAT RENTS [24 CFR 960.253(b) and Notice PIH 2015-13]	page 16-6	Added language: Flat Rents will be effective on January 1 of each year.

ACOP				
CHAPTER	CHAPTER NAME	SECTION	PAGE	COMMENT
	HUD also gives PHAs discretion to			
	maintain			
	a single merged waiting list for all			
	their			
	programs, including Public Housing,			
	HCV, and			
	other subsidized housing programs			
	(24 CFR §			
	982.205(a)(1)).			

# NOTICE OF PUBLIC HEARING FOR THE ELM CITYCOMMUNITIES, HOUSING AUTHORITY OF NEWHAVEN (ECC/HANH) PROPOSED AMENDMENT TO THE LIPH ADMISSION AND COMTINUED OCCUPANCY PLAN (ACOP) AND HCV ADMINISTRATIVE PLAN (ADMIN PLAN)

Elm City Communities, the Housing Authority of the City of New Haven (ECC/HANH) is proposing to amend sections of its Low-Income Public Housing Admissions and Continued Occupancy Policy (ACOP) and the Housing Choice Voucher (HCV) Administrative Plan (Admin Plan).

The thirty (30) days comment period begins on **Monday, September 29, 2025, and ends on Tuesday, October 28, 2025.** Copies of the amendment to the ACOP and the Administrative Plan will be available on the agency website <a href="www.elmcitycommunities.org">www.elmcitycommunities.org</a> or via Facebook, <a href="www.elmcitycommunities">www.elmcitycommunities</a> or via Facebook, <a href="www.elmcitycommunities">www.elmcitycommunities</a> hanh.

You are invited to provide written comments addressed to:

ECC/HANH, ACOP & Admin Plan Revisions;

Attn: Evelise Ribeiro, 360 Orange Street, New Haven, CT 06511 or via email to:

eribeiro@elmcitycommunities.org.

A public hearing where public comments will be accepted and recorded is scheduled **for Monday, October 27, 2025**,3:00pm, via TEAMS.

ID: 298 581 151 620 1 Passcode: WP7wr6tg Dial in by phone

+1 872-240-4494,747680648# United States, Chicago

Find a local number

Phone conference ID: 747 680 648#

Any individual requiring a Reasonable Accommodation to participate in the hearing may call the Reasonable Accommodation Manager (203) 498-8800, ext. 1507 or at the TDD Number (203) 497-8434.

# AVISO DE AUDIENCIA PÚBLICA PARA ELM CITYCOMMUNITIES, AUTORIDAD DE VIVIENDA DE NEWHAVEN (ECC / HANH) PROPUESTA DE ENMIENDA AL PLAN DE ADMISIÓN Y OCUPACIÓN COMTINUADA (ACOP) DE LA LIPH Y AL PLAN ADMINISTRATIVO DE AVC (PLAN ADMIN)

Elm City Communities, la Autoridad de Vivienda de la Ciudad de New Haven (ECC / HANH) está proponiendo revisar secciones de su Política de Admisiones de Vivienda Pública de Bajos Ingresos y Ocupación Continuada (ACOP) y el Plan Administrativo de Vales de Elección de Vivienda (HCV) (Admin. Plan).

El período de treinta (30) días para presentar comentarios comienza el lunes 29 de septiembre de 2025 y finaliza el martes 28 de octubre de 2025. Copias de la enmienda al ACOP y al Plan Administrativo estarán disponibles en el sitio web de la agencia, www.elmcitycommunities.org, o a través de Facebook, www.facebook.com/ElmCityCommunities e Instagram, elmcitycommunities\_hanh.

Le invitamos a enviar sus comentarios por escrito a: ECC/HANH, ACOP y Revisiones del Plan Administrativo; Atención: Evelise Ribeiro, 360 Orange Street, New Haven, CT 06511, o por correo electrónico a: eribeiro@elmcitycommunities.org.

Se ha programado una audiencia pública para el lunes 27 de octubre de 2025 a las 15:00 h, a través de TEAMS, donde se aceptarán y grabarán los comentarios del público.

ID: 298 581 151 620 1

Contraseña: WP7wr6tg Llamar por teléfono

+1 872-240-4494,747680648# Estados Unidos, Chicago

Buscar un número local

ID de conferencia telefónica: 747 680 648#

Cualquier persona que requiera una adaptación razonable para participar en la audiencia puede llamar al Gerente de Adaptaciones Razonables al (203) 498-8800, ext. 1507 o al número TDD (203) 497-8434. Cualquier persona que requiera una adaptación razonable para participar en la audiencia puede llamar al Gerente de Adaptaciones Razonables al (203) 498-8800, ext. 1507 o al número TDD (203) 497-8434.

### Chapter 2

# FAIR HOUSING AND EQUAL OPPORTUNITY

#### INTRODUCTION

This chapter explains the laws and HUD regulations requiring ECC/HANH to affirmatively further civil rights and fair housing in all federally-assisted housing programs. The letter and spirit of these laws are implemented through consistent policy and procedures. The responsibility to further nondiscrimination pertains to all areas of ECC/HANH's public housing operations.

This chapter describes HUD regulations and ECC/HANH policies related to these topics in three parts:

<u>Part I: Nondiscrimination</u>. This part presents the body of laws and regulations governing the responsibilities of ECC/HANH regarding nondiscrimination.

Part II: Policies Related to Persons with Disabilities. This part discusses the rules and policies of the public housing program related to reasonable accommodation for persons with disabilities. These rules and policies are based on the Fair Housing Act (42.U.S.C.) and Section 504 of the Rehabilitation Act of 1973, and incorporate guidance from the Joint Statement of The Department of Housing and Urban Development and the Department of Justice (DOJ), issued May 17, 2004.

Part III: Prohibition of Discrimination Against Limited English Proficiency Persons. This part details the obligations of ECC/HANH to ensure meaningful access to the Public Housing program and its activities by persons with limited English proficiency (LEP). This part incorporates the Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons published January 22, 2007, in the *Federal Register*.

#### PART I: NONDISCRIMINATION

#### 2-I.A. OVERVIEW

Federal laws require ECC/HANH to treat all applicants and tenant families equally, providing the same quality of service, regardless of family characteristics and background. Federal law prohibits discrimination in housing on the basis of race, color, religion, sex, national origin, age, familial status, and disability. In addition, HUD regulations provide for additional protections regarding sexual orientation, gender identity, and marital status. ECC/HANH will comply fully with all federal, state, and local nondiscrimination laws, and with rules and regulations governing fair housing and equal opportunity in housing and employment, including:

- Title VI of the Civil Rights Act of 1964
- Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988)
- Executive Order 11063
- Section 504 of the Rehabilitation Act of 1973
- The Age Discrimination Act of 1975
- Title II of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern)
- The Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule, published in the *Federal Register* February 3, 2012 and further clarified in Notice PIH 2014-20
- The Violence against Women Act of 2013 (VAWA)
- Housing Provisions of the Violence Against Women Act (VAWA) Reauthorization Act of 2022
- Any applicable state laws or local ordinances and any legislation protecting individual rights of tenants, applicants, or staff that may subsequently be enacted

When more than one civil rights law applies to a situation, the laws will be read and applied together.

#### ECC/HANH Policy

The State of Connecticut has established creed, ancestry and marital status as protected classes, in addition to the Federal and HUD protections. The state of Connecticut also prohibits discrimination based on income source.

#### 2-I.B. NONDISCRIMINATION

Federal regulations prohibit discrimination against certain protected classes and other groups of people. State and local requirements, as well as ECC/HANH policy, can prohibit discrimination against additional classes of people.

ECC/HANH shall not discriminate because of race, color, sex, religion, familial status, marital status, gender identity, sexual orientation, age, disability, income source, or national origin as established by federal and state laws (called protected classes).

Familial status includes children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18.

ECC/HANH will not discriminate on the basis of marital status, gender identity, or sexual orientation [FR Notice 02/03/12].

ECC/HANH will not use any of these factors to:

- Deny to any family the opportunity to apply for housing, nor deny to any qualified applicant the opportunity to participate in the public housing program
- Provide housing that is different from that provided to others
- Subject anyone to segregation or disparate treatment
- Restrict anyone's access to any benefit enjoyed by others in connection with the housing program
- Treat a person differently in determining eligibility or other requirements for admission
- Steer an applicant or tenant toward or away from a particular area based on any of these factors
- Deny anyone access to the same level of services
- Deny anyone the opportunity to participate in a planning or advisory group that is an integral part of the housing program
- Discriminate in the provision of residential real estate transactions
- Discriminate against someone because they are related to or associated with a member of a protected class
- Publish or cause to be published an advertisement or notice indicating the availability of housing that prefers or excludes persons who are members of a protected class

# **Providing Information to Families**

ECC/HANH must take steps to ensure that families are fully aware of all applicable civil rights laws. As part of the public housing orientation process, ECC/HANH will provide information to public housing applicant families about civil rights requirements.

### **Discrimination Complaints**

If an applicant or tenant family believes that any family member has been discriminated against by ECC/HANH, the family should advise ECC/HANH. HUD ECC/HANH to make every reasonable attempt to determine whether the applicant or tenant family's assertions have merit and take any warranted corrective action.

In all cases, ECC/HANH may advise the family to file a fair housing complaint if the family feels they have been discriminated against under the Fair Housing Act.

Upon receipt of a housing discrimination complaint, ECC/HANH is required to:

- Provide written notice of the complaint to those alleged and inform the complainant that such notice was made
- Investigate the allegations and provide the complainant and those alleged with findings and either a proposed corrective action or an explanation of why corrective action is not warranted
- Keep records of all complaints, investigations, notices, and corrective actions [Notice PIH 2014-20]

# **ECC/HANH Policy**

Applicants or tenant families who believe that they have been subject to unlawful discrimination may notify ECC/HANH either orally or in writing.

Within 10 business days of receiving the complaint, ECC/HANH will provide a written notice to those alleged to have violated the rule. ECC/HANH will also send a written notice to the complainant informing them that notice was sent to those alleged to have violated the rule, as well as information on how to complete and submit a housing discrimination complaint form to HUD's Office of Fair Housing and Equal Opportunity (FHEO).

ECC/HANH will attempt to remedy discrimination complaints made against ECC/HANH and will conduct an investigation into all allegations of discrimination.

Within 10 business days following the conclusion of ECC/HANH's investigation, ECC/HANH will provide the complainant and those alleged to have violated the rule with findings and either a proposed corrective action plan or an explanation of why corrective action is not warranted.

ECC/HANH will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)

#### PART II: POLICIES RELATED TO PERSONS WITH DISABILITIES

#### 2-II.A. OVERVIEW

One type of disability discrimination prohibited by the Fair Housing Act is the refusal to make reasonable accommodation in rules, policies, practices, or services when such accommodation may be necessary to afford a person with a disability the equal opportunity to use and enjoy the program or dwelling under the program.

ECC/HANH must ensure that persons with disabilities have full access to ECC/HANH's programs and services. This responsibility begins with the first inquiry of an interested family and continues through every programmatic area of the public housing program [24 CFR 8].

ECC/HANH must provide a notice to each tenant that the tenant may, at any time during the tenancy, request a reasonable accommodation <u>for</u> a disability of a household member, including reasonable accommodation so that the tenant can meet lease requirements or other requirements of tenancy [24 CFR 966.7(b)].

# ECC/HANH Policy

ECC/HANH will ask all applicants and resident families if they require any type of accommodation, in writing, on the intake application, reexamination documents, and notices of adverse action by ECC/HANH, by including the following language:

"If you or anyone in your family is a person with disabilities, and you require a specific reasonable accommodation in order to fully utilize our programs and services, please contact ECC/HANH staff or the Reasonable Accommodation Manager."

The family may complete and submit the Reasonable Accommodation request form, or may request a reasonable accommodation orally, and the request will be passed on to the designated staff person, the Reasonable Accommodation Manager.

ECC/HANH will display posters and other housing information and signage in locations throughout ECC/HANH offices in such a manner as to be easily readable from a wheelchair.

#### 2-II.B. DEFINITION OF REASONABLE ACCOMMODATION

A "reasonable accommodation" is a change, exception, or adjustment to a policy, practice or service that may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces. Since policies and services may have a different effect on persons with disabilities than on other persons, treating persons with disabilities the same as others will sometimes deny them an equal opportunity to use and enjoy a dwelling. [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act]

Federal regulations stipulate that requests for accommodations will be considered reasonable if they do not create an "undue financial and administrative burden" for the PHA or result in a "fundamental alteration" in the nature of the program or service offered. A fundamental alteration is a modification that alters the essential nature of a provider's operations.

# **Types of Reasonable Accommodations**

When it is reasonable (see definition above and Section 2-II.E), ECC/HANH shall accommodate the needs of a person with disabilities. Examples include but are not limited to:

- Permitting applications and reexaminations to be completed by mail
- Providing "large-print" forms
- Conducting home visits
- Permitting a higher utility allowance for the unit if a person with disabilities requires the use of specialized equipment related to the disability
- Modifying or altering a unit or physical system if such a modification or alteration is necessary to provide equal access to a person with a disability
- Installing a ramp into a dwelling or building
- Installing grab bars in a bathroom
- Installing visual fire alarms for hearing impaired persons
- Allowing an ECC/HANH-approved live-in aide to reside in the unit if that person is determined to be essential to the care of a person with disabilities, is not obligated for the support of the person with disabilities and would not be otherwise living in the unit.
- Providing a designated handicapped-accessible parking space
- Allowing a service or assistance animal
- Permitting an authorized designee or advocate to participate in the application or certification process and any other meetings with ECC/HANH staff
- Displaying posters and other housing information in locations throughout the ECC/HANH office in such a manner as to be easily readable from a wheelchair

### 2-II.C. REQUEST FOR AN ACCOMMODATION

If an applicant or participant indicates that an exception, change, or adjustment to a rule, policy, practice, or service is needed because of a disability, HUD requires that ECC/HANH treat the information as a request for a reasonable accommodation, even if no formal request is made [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].

The family must explain what type of accommodation is needed to provide the person with the

disability full access to ECC/HANH's programs and services.

If the need for the accommodation is not readily apparent or known to ECC/HANH, the family must explain the relationship between the requested accommodation and the disability.

# **ECC/HANH Policy**

ECC/HANH will encourage the family to make its request in writing using a reasonable accommodation request form. However, ECC/HANH will consider the accommodation any time the family indicates that an accommodation is needed whether or not a formal written request is submitted.

#### 2-II.D. VERIFICATION OF DISABILITY

The regulatory civil rights definition for persons with disabilities is provided in Exhibit 2-1 at the end of this chapter. The definition of a person with a disability for the purpose of obtaining a reasonable accommodation is much broader than the HUD definition of disability which is used for waiting list preferences and income allowances.

Before providing an accommodation, ECC/HANH must determine that the person meets the definition of a person with a disability, and that the accommodation is necessary for a family to have access to ECC/HANH's programs and services.

If a person's disability is obvious or otherwise known to ECC/HANH, and if the need for the requested accommodation is also readily apparent or known, no further verification will be required [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].

If a family indicates that an accommodation is required for a disability that is not obvious or otherwise known to ECC/HANH, ECC/HANH must verify that the person meets the definition of a person with a disability, and that the limitations imposed by the disability require the requested accommodation.

When verifying a disability, ECC/HANH will follow the verification policies provided in Chapter 7. All information related to a person's disability will be treated in accordance with the confidentiality policies provided in Chapter 16 (Program Administration). In addition to the general requirements that govern all verification efforts, the following requirements apply when verifying a disability:

- Third-party verification must be obtained from an individual identified by the family who is competent to make the determination. A doctor or other medical professional, a peer support group, a non-medical service agency, or a reliable third party who is in a position to know about the individual's disability may provide verification of a disability [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].
- ECC/HANH must request only information that is necessary to evaluate the disability-related need for the accommodation. ECC/HANH may not inquire about the nature or extent of any disability.

- Medical records will not be accepted or retained in the tenant file.
- In the event that ECC/HANH does receive confidential information about a person's specific diagnosis, treatment, or the nature or severity of the disability, ECC/HANH will dispose of it. In place of the information, ECC/HANH will note in the file that the disability and other requested information have been verified, the date the verification was received, and the name and address of the knowledgeable professional who sent the information [Notice PIH 2010-26].

**2-II.E. APPROVAL/DENIAL OF A REQUESTED ACCOMMODATION** [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act, Notice PIH 2010-26]

ECC/HANH must approve a request for an accommodation if the following three conditions are met.

- The request was made by or on behalf of a person with a disability.
- There is a disability-related need for the accommodation.
- The requested accommodation is reasonable, meaning it would not impose an undue financial and administrative burden on ECC/HANH, or fundamentally alter the nature of ECC/HANH's operations.

Requests for accommodations must be assessed on a case-by-case basis. The determination of undue financial and administrative burden must be made on a case-by-case basis involving various factors, such as the overall size of ECC/HANH's program with respect to the number of employees, type of facilities and size of budget, type of operation including composition and structure of workforce, the nature and cost of the requested accommodation, and the availability of alternative accommodations that would effectively meet the family's disability-related needs.

Before making a determination whether to approve the request, ECC/HANH may enter into discussion and negotiation with the family, request more information from the family, or may require the family to sign a consent form so that ECC/HANH may verify the need for the requested accommodation.

# **ECC/HANH Policy**

Requests will be acted on promptly; a person can generally expect a response within 30 days of submission of the reasonable accommodation request. Circumstances that may cause a delay in processing include but are not limited to: delay in obtaining verification of the need for the reasonable accommodation, or failure of the family to clearly specify the requested accommodation or to provide the name and address of their designated verification source.

An approved reasonable accommodation will not be re-verified by ECC unless the Family demonstrates that the accommodation is no longer required for a disability. In such cases, ECC will enter into communications with the Family about the continued need for the accommodation.

If the family fails to specify the requested accommodation, provide the name and address of their verifications source, or provide requested verification to ECC/HANH, ECC/HANH will notify the family and inform the family that ECC/HANH is unable to make a determination.

If ECC/HANH denies a request for an accommodation because it is not reasonable (it would impose an undue financial and administrative burden or fundamentally alter the nature of ECC/HANH's operations), ECC/HANH will discuss with the family whether an alternative accommodation could effectively address the family's disability-related needs

without a fundamental alteration to the public housing program and without imposing an undue financial and administrative burden.

If ECC/HANH believes that the family has failed to identify a reasonable alternative accommodation after interactive discussion and negotiation, HANH will notify the family, in writing, of its determination within 10 business days from the date of ECC/HANH's determination of denial. The notice will inform the family of the right to appeal ECC/HANH's decision through an informal hearing (if applicable) or the grievance process (Chapter 14) and will also notify the family that they may appeal to HUD and provide information on how to do so.

If ECC/HANH believes that the family has failed to identify a reasonable alternative accommodation after interactive discussion and negotiation, ECC/HANH will notify the family, in writing, of its determination within 10 business days from the date of ECC/HANH's determination of denial. The notice will inform the family of the right to appeal ECC/HANH's decision through an informal hearing (if applicable) or the grievance process (see Chapter 14).

# 2-II.F. PROGRAM ACCESSIBILITY FOR PERSONS WITH HEARING OR VISION IMPAIRMENTS

HUD regulations require ECC/HANH to take reasonable steps to ensure that persons with disabilities related to hearing and vision have reasonable access to ECC/HANH's programs and services [24 CFR 8.6].

At the initial point of contact with each applicant, ECC/HANH shall inform all applicants of alternative forms of communication that can be used other than plain language paperwork.

# **ECC/HANH Policy**

To meet the needs of persons with hearing impairments, TTD/TTY (text telephone display / teletype) communication will be available.

To meet the needs of persons with vision impairments, large-print and audio versions of key program documents will be made available upon request. When visual aids are used in public meetings or presentations, or in meetings with ECC/HANH staff, one-on-one assistance will be provided upon request.

Additional examples of alternative forms of communication are sign language interpretation; having material explained orally by staff; or having a third-party representative (a friend, relative or advocate, named by the applicant or tenant) to receive, interpret and explain housing materials and be present at all meetings.

Large print notices will be posted in central and local offices informing families of the availability of such accommodations, and staff will explain the availability of these accommodations during face-to-face meetings.

#### 2-II.G. PHYSICAL ACCESSIBILITY

ECC/HANH must comply with a variety of regulations pertaining to physical accessibility, including

- Notice PIH 2010-26
- Section 504 of the Rehabilitation Act of 1973
- The Americans with Disabilities Act of 1990
- The Architectural Barriers Act of 1968
- The Fair Housing Act of 1988

ECC/HANH's policies concerning physical accessibility must be readily available to applicants and resident families. They can be found in three key documents.

- This Admissions and Continued Occupancy Policy, which describes the key policies that govern the ECC/HANH's responsibilities with regard to physical accessibility.
- Notice PIH 2010-26 summarizes information about pertinent laws and implementing regulations related to nondiscrimination and accessibility in federally-funded housing programs.
- The ECC/HANH Plan provides information about self-evaluation, needs assessment, and transition plans.

The design, construction, or alteration of ECC/HANH facilities must conform to the Uniform Federal Accessibility Standards (UFAS). Notice PIH 2010-26 contains specific information on calculating the percentages of units for meeting UFAS requirements.

Newly-constructed facilities must be designed to be readily accessible to and usable by persons with disabilities. Alterations to existing facilities must be accessible to the maximum extent feasible, defined as not imposing an undue financial and administrative burden on the operations of the public housing program.

# 2-II.H. DENIAL OR TERMINATION OF ASSISTANCE

ECC/HANH's decision to deny or terminate the assistance of a family that includes a person with disabilities is subject to consideration of reasonable accommodation [24 CFR 966.7].

When applicants with disabilities are denied assistance, the notice of denial must inform them of their right to request an informal hearing [24 CFR 960.208(a)].

When a family's lease is terminated, the notice of termination must inform the family of their right to request a hearing in accordance with ECC/HANH's grievance process [24 CFR 966.4(1)(3)(ii)].

When reviewing reasonable accommodation requests, ECC/HANH must consider whether reasonable accommodation will allow the family to overcome the problem that led to the ECC/HANH's decision to deny or terminate assistance. If a reasonable accommodation will

allow the family to meet the requirements, ECC/HANH must make the accommodation [24 CFR 966.7].

In addition, ECC/HANH must provide reasonable accommodation for persons with disabilities to participate in the hearing process [24 CFR 966.56(h)].

# **EXHIBIT 6-1: ANNUAL INCOME INCLUSIONS**

#### 24 CFR 5.609

- (a) Annual income means all amounts, monetary or not, which:
- (1) Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or
- (2) Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
- (3) Which are not specifically excluded in paragraph (c) of this section.
- (4) Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.
- **(b)** Annual income includes, but is not limited to:
- (1) The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services;
- (2) The net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family;

- (3) Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation is permitted only as authorized in paragraph (b)(2) of this section. Any withdrawal of cash or assets from an investment will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested by the family. Where the family has net family assets in excess of \$5,000, annual income shall include the greater of the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate, as determined by HUD;
- (4) The full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts, including a lumpsum amount or prospective monthly amounts for the delayed start of a periodic amount (except as provided in paragraph (c)(14) of this section);
- (5) Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation and severance pay (except as provided in paragraph (c)(3) of this section);
- (6) Welfare assistance payments.
- (i) Welfare assistance payments made under the Temporary Assistance for Needy Families (TANF) program are included in annual income only to the extent such payments:

- (A) Qualify as assistance under the TANF program definition at 45 CFR 260.31<sup>1</sup>; and
- (B) Are not otherwise excluded under paragraph (c) of this section.
- (ii) If the welfare assistance payment includes an amount specifically designated for shelter and utilities that is subject to adjustment by the welfare assistance agency in accordance with the actual cost of shelter and utilities, the amount of welfare assistance income to be included as income shall consist of:
- (A) The amount of the allowance or grant exclusive of the amount specifically designated for shelter or utilities; plus
- (B) The maximum amount that the welfare assistance agency could in fact allow the family for shelter and utilities. If the family's welfare assistance is ratably reduced from the standard of need by applying a percentage, the amount calculated under this paragraph shall be the amount resulting from one application of the percentage.
- (7) Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from organizations or from persons not residing in the dwelling;
- (8) All regular pay, special pay and allowances of a member of the Armed Forces (except as provided in paragraph (c)(7) of this section)
- (9) For section 8 programs only and as provided in 24 CFR 5.612, any financial assistance, in excess of amounts received for tuition, that an individual receives under the Higher Education Act of 1965 (20 U.S.C. 1001 *et seq.*), from private sources, or from an institution of higher education (as defined under the Higher Education Act of 1965 (20 U.S.C. 1002)), shall be considered income to that individual, except that financial

assistance described in this paragraph is not considered annual income for persons over the age of 23 with dependent children. For purposes of this paragraph, "financial assistance" does not include loan proceeds for the purpose of determining income.

# HHS DEFINITION OF "ASSISTANCE"

# 45 CFR: GENERAL TEMPORARY ASSISTANCE FOR NEEDY FAMILIES

# 260.31 What does the term "assistance" mean?

- (a)(1) The term "assistance" includes cash, payments, vouchers, and other forms of benefits designed to meet a family's ongoing basic needs (i.e., for food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses).
- (2) It includes such benefits even when they are:
- (i) Provided in the form of payments by a TANF agency, or other agency on its behalf, to individual recipients; and
- (ii) Conditioned on participation in work experience or community service (or any other work activity under 261.30 of this chapter).
- (3) Except where excluded under paragraph
- (b) of this section, it also includes supportive services such as transportation and child care provided to families who are not employed.
- (b) [The definition of "assistance"] excludes:
- (1) Nonrecurrent, short-term benefits that:
- (i) Are designed to deal with a specific crisis situation or episode of need;
- (ii) Are not intended to meet recurrent or ongoing needs; and
- (iii) Will not extend beyond four months.
- (2) Work subsidies (i.e., payments to employers or third parties to help cover the

<sup>&</sup>lt;sup>1</sup> Text of 45 CFR 260.31 follows (next page).

- costs of employee wages, benefits, supervision, and training);
- (3) Supportive services such as child care and transportation provided to families who are employed;
- (4) Refundable earned income tax credits;
- (5) Contributions to, and distributions from, Individual Development Accounts;
- (6) Services such as counseling, case management, peer support, child care

- information and referral, transitional services, job retention, job advancement, and other employment-related services that do not provide basic income support; and
- (7) Transportation benefits provided under a Job Access or Reverse Commute project, pursuant to section 404(k) of [the Social Security] Act, to an individual who is not otherwise receiving assistance

#### **EXHIBIT 6-2: ANNUAL INCOME EXCLUSIONS**

#### 24 CFR 5.609

- **(c)** Annual income does not include the following:
- (1) Income from employment of children (including foster children) under the age of 18 years;
- (2) Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the tenant family, who are unable to live alone);
- (3) Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in paragraph (b)(5) of this section);
- (4) Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member;
- (5) Income of a live-in aide, as defined in Sec. 5.403;
- (6) Subject to paragraph (b)(9) of this section, the full amount of student financial assistance paid directly to the student or to the educational institution;
- (7) The special pay to a family member serving in the Armed Forces who is exposed to hostile fire;
- (8) (i) Amounts received under training programs funded by HUD;
- (ii) Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS);

- (iii) Amounts received by a participant in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, child care, etc.) and which are made solely to allow participation in a specific program;
- (iv) Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time;
- (v) Incremental earnings and benefits resulting to any family member from participation in qualifying State or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for the period during which the family member participates in the employment training program;
- (9) Temporary, nonrecurring or sporadic income (including gifts);
- (10) Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;

- (11) Earnings in excess of \$480 for each fulltime student 18 years old or older (excluding the head of household and spouse);
- (12) Adoption assistance payments in excess of \$480 per adopted child;
- (13) [Reserved]
- (14) Deferred periodic amounts from supplemental security income and social security benefits that are received in a lump sum amount or in prospective monthly amounts.
- (15) Amounts received by the family in the form of refunds or rebates under State or local law for property taxes paid on the dwelling unit;

- (16) Amounts paid by a State agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home; or
- (17) Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions set forth in 24 CFR 5.609(c) apply. A notice will be published in the Federal Register and distributed to PHAs and housing owners identifying the benefits that qualify for this exclusion. Updates will be published and distributed when necessary. [See the following chart for a list of benefits that qualify for this exclusion.]

#### **EXHIBIT 6-3: TREATMENT OF FAMILY ASSETS**

## 24 CFR 5.603(b) Net Family Assets

- (1) Net cash value after deducting reasonable costs that would be incurred in disposing of real property, savings, stocks, bonds, and other forms of capital investment, excluding interests in Indian trust land and excluding equity accounts in HUD homeownership programs. The value of necessary items of personal property such as furniture and automobiles shall be excluded.
- (2) In cases where a trust fund has been established and the trust is not revocable by, or under the control of, any member of the family or household, the value of the trust fund will not be considered an asset so long as the fund continues to be held in trust. Any income distributed from the trust fund shall be counted when determining annual income under Sec. 5.609.
- (3) In determining net family assets, PHAs or owners, as applicable, shall include the value of any business or family assets disposed of by an applicant or tenant for less than fair market value (including a disposition in trust, but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application for the program or reexamination, as applicable, in excess of the consideration received therefor. In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be for less than fair market value if the applicant or tenant receives important consideration not measurable in dollar terms.
- (4) For purposes of determining annual income under Sec. 5.609, the term "net family assets" does not include the value of a home currently being purchased with assistance under part 982, subpart M of this title. This exclusion is limited to the first 10 years after the purchase date of the home.



## Shenae Draughn, President

#### **MEMORANDUM**

TO: Board of Commissioners

DATE: November 18, 2025

FROM: Shenae Draughn, President

RE: Resolution Authorizing the Revision of the ECC/HANH Housing Choice Voucher

Administrative Plan (Admin Plan) 2025

ACTION: Recommend that the Board of Commissioners adopt Resolution Number

#11-85/25-R

TIMING: Immediately

DISCUSSION: On June 19, 2018, the Board of Commissioners adopted resolution #06-

63/18-S, authorizing the revision of the Housing Choice Voucher

Administrative Plan (Admin Plan).

On June 16, 2020, the Board of Commissioners adopted resolution **#03- 23/20-S**, authorizing an additional revision of the Housing Choice Voucher

Administrative Plan (Admin Plan).

On July 21, 2020, the Board of Commissioners adopted resolution # <u>07-62/20</u>, authorizing an additional revision of the Housing Choice Voucher

Administrative Plan (Admin Plan).

On October 20, 2020, the Board of Commissioners adopted resolution # 10-97/20-R, authorizing an additional revision of the Housing Choice

Voucher Administrative Plan (Admin Plan).

On February 16, 2021, the Board of Commissioners adopted resolution # **02-08/21-R**, authorizing an additional revision of the Housing Choice

Voucher Administrative Plan (Admin Plan).

On December 21, 2021, the Board of Commissioners adopted resolution #12-103/21-R, authorizing an additional revision of the Housing Choice

Voucher Administrative Plan (Admin Plan).

On June 21, 2022, the Board of Commissioners adopted resolution #06-25/22-R, authorizing an additional revision of the Housing Choice Voucher

Administrative Plan (Admin Plan).



On September 20, 2022, the Board of Commissioners adopted resolution #09-49/22-R, authorizing an additional revision of the Housing Choice Voucher Administrative Plan (Admin Plan).

On November 15, 2022, the Board of Commissioners adopted resolution #11-71/22, authorizing an additional revision of the Housing Choice Voucher Administrative Plan (Admin Plan).

On September 19, 2023, the Board of Commissioners adopted resolution #09-78/23, authorizing an additional revision of the Housing Choice Voucher Administrative Plan (Admin Plan).

On September 17, 2024, the Board of Commissioners adopted resolution #09-58/24-R, authorizing an additional revision of the Housing Choice Voucher Administrative Plan (Admin Plan).

The Administrative Plan is required by HUD. The purpose of the Administrative Plan is to establish policies for carrying out the Housing Choice Voucher program in a manner consistent with HUD requirements and local goals and objectives contained in ECC/HANH's MTW plan. The Administrative Plan is a supporting document to the ECC/HANH MTW plan and is available for public review as required by CFR 24 Part 903.

The policies in this Administrative Plan have been designed to ensure compliance with the consolidated ACC and all HUD-approved applications for Housing Choice Voucher (HCV) program funding.

ECC/HANH is responsible for complying with all changes in HUD regulations pertaining to the HCV program. If such changes conflict with this plan, HUD regulations will have precedence.

HUD regulations contain a list of what must be included in the Administrative Plan.

The revisions are updates to the following chapters.

- Chapter 2 Fair Housing and Equal Opportunity
  - o Part I: Nondiscrimination
  - o 2-II.E.: Approval/Denial of a Requested Accommodation
  - o Part IV: Violence Against Women Act (VAWA)
- Chapter 3 Eligibility
  - o Part I: Definitions of Family and Household Members
  - o Part II: Basic Eligibility Criteria
- Chapter 4 Applications. Waiting List and Tenant Selection
  - Part II: Managing the Waiting List
- Chapter 5 Briefings and Voucher Issuance
  - Part I: Briefings and Family Obligations
- Chapter 6: Income and Subsidy Determinations
  - o Part I: Annual Income



- Chapter 7 Verification
  - o Part II: Verifying Family Information
- Chapter 8 Housing Quality Standards and Rent Reasonableness Determinations
  - o Part II: The Inspection Process
- Chapter 11 Reexaminations
  - o Part I: Bi/Triennial Reexaminations [24 CFR 982.516]
- Chapter 16 Program Administration
  - o Part VI: Record Keeping
- Chapter 19 Mixed Finance Developments Including Rental Assistance Demonstration/Project Based Voucher (RAD/PBV)
  - Section IV Applications, Waiting List, Tenant Selection and Transfer Policy
    - Introduction
    - Part I: The Application Process
    - Part III: Selection for HCV Assistance
  - Section VI Income and Subsidy Determinations
    - Part II: Monthly Income Tiered Rent and Total Tenant Payment
  - Section XI– Reexaminations
    - Part I: Bi/Triennial Reexamination [24 CFR 982.526]

A 30-day comment period occurred from September 29, 2025, to Tuesday, October 28, 2025. A public hearing for comments was held on Monday, October 27, 2025. There was one (1) public comment.

FISCAL IMPACT: None

SOURCE OF FUNDS: N/A

STAFF: Evelise Ribeiro, Director of Compliance and MTW Initiatives



# HOUSING AUTHORITY OF THE CITY OF NEW HAVEN d/b/a Elm City Communities

#### **RESOLUTION #11-85/25-R**

# RESOLUTION AUTHORIZING THE REVISION OF THE ECC/HANH HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN (ADMIN PLAN) 2025

**WHEREAS**, on June 19, 2018, the Board of Commissioners adopted resolution # <u>06-63/18-S</u>, authorizing the revision of the Housing Choice Voucher Administrative Plan (Admin Plan); and

**WHEREAS**, on June 16, 2020, the Board of Commissioners adopted resolution # <u>03-23/20-S</u>, authorizing an additional revision of the Housing Choice Voucher Administrative Plan (Admin Plan); and

**WHEREAS**, on July 21, 2020, the Board of Commissioners adopted resolution # <u>07-62/20-R</u>, authorizing an additional revision of the Housing Choice Voucher Administrative Plan (Admin Plan); and

**WHEREAS**, on October 20, 2020, the Board of Commissioners adopted resolution # <u>10-97/20-R</u>, authorizing an additional revision of the Housing Choice Voucher Administrative Plan (Admin Plan); and

**WHEREAS**, on February 16, 2021, the Board of Commissioners adopted resolution # <u>02-08/21-R</u>, authorizing an additional revision of the Housing Choice Voucher Administrative Plan (Admin Plan); and

**WHEREAS**, on December 21, 2021, the Board of Commissioners adopted resolution # authorizing an additional revision of the Housing Choice Voucher Administrative Plan (Admin Plan); and

**WHEREAS**, on June 21, 2022, the Board of Commissioners adopted resolution #06-25/22-R, authorizing an additional revision of the Housing Choice Voucher Administrative Plan (Admin Plan); and

**WHEREAS**, on September 20, 2022, the Board of Commissioners adopted resolution #09-49/22-**R**, authorizing an additional revision of the Housing Choice Voucher Administrative Plan (Admin Plan).

**WHEREAS**, on November 15, 2022, the Board of Commissioners adopted resolution #11-71/22- $\mathbb{R}$ , authorizing an additional revision of the Housing Choice Voucher Administrative Plan (Admin Plan).

**WHEREAS**, on September 19, 2023, the Board of Commissioners adopted resolution #**09-78/23**-**R**, authorizing an additional revision of the Housing Choice Voucher Administrative Plan (Admin Plan).



**WHEREAS**, on September 17, 2024, the Board of Commissioners adopted resolution #**09-58/24-R**, authorizing an additional revision of the Housing Choice Voucher Administrative Plan (Admin Plan).

**WHEREAS**, the Administrative Plan is required by HUD. The purpose of the Administrative Plan is to establish policies for carrying out the Housing Choice Voucher program in a manner consistent with HUD requirements and local goals and objectives contained in ECC/HANH's MTW plan; and

**WHEREAS**, the revisions are updates to the following chapters:

- Chapter 2 Fair Housing and Equal Opportunity
- Chapter 3 Eligibility
- Chapter 4 Applications, Waiting List and Tenant Selection
- Chapter 5 Briefings and Voucher Issuance
- Chapter 6 Income and Subsidy Determinations
- Chapter 7 Verifications
- Chapter 8 Housing Quality Standards and Rent Reasonableness Determinations
- Chapter 16 Program Administration
- Chapter 19 Mixed Finance Developments Including Rental Assistance Demonstration / Project-Based Voucher (RAD/PBV).

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF NEW HAVEN, THAT:

- The revisions to the Administrative Plan for the Housing Choice Voucher Plan as set forth in the recitals hereinabove be and hereby are authorized and directed; and
- 2. The President be and hereby is adopted, empowered and directed to take any and all such action necessary and appropriate to fulfill the foregoing purposes, to execute and deliver such documents and instruments, and to take any and all such action ancillary, related and or/necessary action to fulfill the foregoing purposes and the purposes of this Resolution; and
- 3. This Resolution shall take effect immediately.

[CERTIFICATION FOLLOWS]



I hereby certify that the above resolution was adopted by a majority of the Commissioners present at a meeting duly called at which a quorum was present, on November 18, 2025.

	Shenae Draughn Secretary/President
	Date
REVIEWED: MCCARTER & ENGLISH, LLP GENERAL COUNSEL	
By: Rolan Joni Young, Esq. A Partner	_

### Chapter 2

# FAIR HOUSING AND EQUAL OPPORTUNITY

#### INTRODUCTION

This chapter explains the laws and HUD regulations requiring ECC/HANH to affirmatively further civil rights and fair housing in all federally-assisted housing programs. The letter and spirit of these laws are implemented through consistent policy and processes. The responsibility to further nondiscrimination pertains to all areas of the ECC/HANH's housing choice voucher (HCV) operations.

This chapter describes HUD regulations and ECC/HANH policies related to these topics in three parts:

<u>Part I: Nondiscrimination</u>. This part presents the body of laws and regulations governing the responsibilities of ECC/HANH regarding nondiscrimination.

<u>Part II: Policies Related to Persons with Disabilities</u>. This part discusses the rules and policies of the housing choice voucher program related to reasonable accommodation for persons with disabilities. These rules and policies are based on the Fair Housing Act (42.U.S.C.) and Section 504 of the Rehabilitation Act of 1973, and incorporate guidance from the Joint Statement of The Department of Housing and Urban Development and the Department of Justice (DOJ), issued May 17, 2004.

Part III: Prohibition of Discrimination Against Limited English Proficiency Persons. This part details the obligations of ECC/HANH to ensure meaningful access to the HCV program and its activities by persons with limited English proficiency (LEP). This part incorporates the Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons published January 22, 2007, in the *Federal Register*.

#### PART I: NONDISCRIMINATION

#### 2-I.A. OVERVIEW

Federal laws require ECC/HANH to treat all applicants and participants equally, providing the same opportunity to access services, regardless of family characteristics and background. Federal law prohibits discrimination in housing on the basis of race, color, religion, sex, national origin, age, familial status, and disability. In addition, HUD regulations provide for additional protections regarding sexual orientation, gender identity, and marital status. ECC/HANH will comply fully with all federal, state, and local nondiscrimination laws, and with rules and regulations governing fair housing and equal opportunity in housing and employment, including:

- Title VI of the Civil Rights Act of 1964
- Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988)
- Executive Order 11063
- Section 504 of the Rehabilitation Act of 1973
- The Age Discrimination Act of 1975
- Title II of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern)
- The Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule, published in the *Federal Register* February 3, 2012 and further clarified in Notice PIH 2014-20
- Violence Against Women Reauthorization Act of 2013 (VAWA)
- Housing Provisions of the Violence Against Women Act (VAWA) Reauthorization Act of 2022

When more than one civil rights law applies to a situation, the laws will be read and applied together.

Any applicable state laws or local ordinances and any legislation protecting individual rights of tenants, applicants, or staff that may subsequently be enacted will also apply.

### **ECC/HANH Policy**

The state of Connecticut has established creed, ancestry and marital status as protected classes. In addition to the Federal and HUD protections. The state of Connecticut also prohibits discrimination based on income source.

#### 2-I.B. NONDISCRIMINATION

Federal regulations prohibit discrimination against certain protected classes and other groups of people. State and local requirements, as well as ECC/HANH policies, can prohibit discrimination based on other factors.

ECC/HANH shall not discriminate because of race, color, sex, religion, familial status, marital status, gender identity, sexual orientation, age, disability, income source, or national origin as established by federal and state laws (called protected classes).

Familial status includes children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18.

ECC/HANH will not discriminate on the basis of marital status, gender identity, or sexual orientation [FR Notice 02/03/12].

ECC/HANH will not use any of these factors to:

- Deny to any family the opportunity to apply for housing, nor deny to any qualified applicant the opportunity to participate in the housing choice voucher program
- Provide housing that is different from that provided to others
- Subject anyone to segregation or disparate treatment
- Restrict anyone's access to any benefit enjoyed by others in connection with the housing program
- Treat a person differently in determining eligibility or other requirements for admission
- Steer an applicant or participant toward or away from a particular area based any of these factors
- Deny anyone access to the same level of services
- Deny anyone the opportunity to participate in a planning or advisory group that is an integral part of the housing program
- Discriminate in the provision of residential real estate transactions
- Discriminate against someone because they are related to or associated with a member of a protected class
- Publish or cause to be published an advertisement or notice indicating the availability of housing that prefers or excludes persons who are members of a protected class

## **Providing Information to Families and Owners**

ECC/HANH must take steps to ensure that families and owners are fully aware of all applicable civil rights laws. As part of the briefing process, ECC/HANH must provide information to HCV applicant families about civil rights requirements and the opportunity to rent in a broad range of neighborhoods [24 CFR 982.301].

The Housing Assistance Payments (HAP) contract informs owners of the requirement not to discriminate against any person because of race, color, religion, sex, national origin, age, familial status, or disability in connection with the contract.

## **Discrimination Complaints**

If an applicant or participant believes that any family member has been discriminated against by ECC/HANH or an owner, the family should advise ECC/HANH. HUD requires ECC/HANH to

#### PART VI: RECORD KEEPING

#### 16-VI.A. OVERVIEW

ECC/HANH must maintain complete and accurate accounts and other records for the program in accordance with HUD requirements, in a manner that permits a speedy and effective audit. All such records must be made available to HUD or the Comptroller General of the United States upon request.

In addition, ECC/HANH must ensure that all applicant and participant files are maintained in a way that protects an individual's privacy rights.

# 16-VI.B. RECORD RETENTION [24 CFR 982.158]

During the term of each assisted lease, and for at least three years thereafter, ECC/HANH must keep:

- A copy of the executed lease;
- The HAP contract; and
- The application from the family.

In addition, ECC/HANH must keep the following records for at least three years:

- Records that provide income, racial, ethnic, gender, and disability status data on program applicants and participants;
- An application from each ineligible family and notice that the applicant is not eligible;
- HUD-required reports;
- Unit inspection reports;
- Lead-based paint records as required by 24 CFR 35, Subpart B.
- Accounts and other records supporting ECC/HANH budget and financial statements for the program;
- Records to document the basis for ECC/HANH determination that rent to owner is a reasonable rent (initially and during the term of a HAP contract); and
- Other records specified by HUD.

ECC/HANH must keep the last three years of the Form HUD-50058 and supporting documentation during the term of each assisted lease, and for a period of at least three years from the end of participation (EOP) date [24 CFR 908.101].

ECC/HANH must maintain Enterprise Income Verification (EIV) system Income Reports in the tenant file for the duration of the tenancy but for a period not to exceed three years from the EOP date [Notice PIH 2018-18].

Notice PIH 2014-20 requires ECC/HANH to keep records of all complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule.

## Chapter 19

## **SECTION V**

#### **BRIEFINGS AND VOUCHER ISSUANCE**

#### INTRODUCTION

For the standard and RAD PBV programs:

Like in the HCV program, families who are to receive assistance in a PBV unit must be briefed by ECC/HANH; however, the required briefing topics and materials differ for PBV assistance.

Regulations pertaining to voucher issuance do not apply to the PBV program since families are not issued vouchers for project-based assistance.

This chapter does not apply to the LIHTC program.

#### PART I: BRIEFINGS AND FAMILY OBLIGATIONS

## 5-I.A. OVERVIEW

For the standard and RAD PBV programs, this section is amended to read:

HUD regulations require ECC/HANH to conduct mandatory briefings for applicant families who qualify for assistance in a PBV unit. The briefing provides a broad description of owner and family responsibilities and ECC/HANH's procedures. This part describes how oral briefings will be conducted, specifies what written information will be provided to families, and lists the family's obligations under the program.

### 5-I.B. BRIEFING [24 CFR 982.301] [24 CFR 983.252]

No changes to this section, with the exception that ECC/HANH includes staff for the particular PBV/RAD development.

**Notification and Attendance** 

No changes to this section, with the following exception:

"If the applicant family wishes to add or remove a member(s) at the time of the initial briefing, the family will be referred Development staff".

**Oral Briefing (24 CFR 983.252(a))** 

For standard and RAD PBV units only the first two bullets apply:

- A description of how the program works; and
- Family and owner responsibilities

# **Briefing Packet [24 CFR 983.252(b)]**

For standard and RAD PBV units, the regulations only require that the following items must be included in the briefing packet:

- How the ECC/HANH determines the total tenant payment for a family;
- Family obligations under the program; and
- Applicable fair housing information

#### 5-I.C. FAMILY OBLIGATIONS

### **Time Frames for Reporting Changes Required By Family Obligations**

No changes to this section.

## Family Obligations [24 CFR 982.551]

For the standard and RAD PBV programs, this section is amended to read:

Obligations of the family are described in the housing choice voucher (HCV) regulations and on the PBV Statement of Family Responsibility. These obligations include responsibilities the family is required to fulfill, as well as prohibited actions. ECC/HANH must inform families of these obligations during the oral briefing, and the same information must be included in the briefing packet. When an offer of PBV assistance is made, the family must meet those obligations in order to participate in the program. Violation of any family obligation may result in termination of assistance, as described in Chapter 12.

#### PART II: SUBSIDY STANDARDS AND VOUCHER ISSUANCE

#### 5-II.A. OVERVIEW

For the standard and RAD PBV programs, this section is amended to read:

While ECC/HANH must establish subsidy standards that determine the number of bedrooms needed for families of different sizes and compositions for the regular HCV program, subsidy standards are not used to determine maximum subsidy in PBV units. Rather, subsidy standards in the PBV program are only used to determine the appropriate unit size for the family. This part presents the policies that will be used to determine the family unit size, and the policies that govern making exceptions to those standards.

# **5-II.B. DETERMINING FAMILY UNIT (VOUCHER) SIZE [24 CFR 982.402]** [24 CFR 983.253(b)]

For the standard and RAD PBV programs, this section is amended to read:

This section applies except that family size is not entered on the family's voucher since there is no voucher in PBV. Provisions relating to maximum subsidy based on family size and family's ability to lease a larger or smaller unit than their voucher size do not

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apply. The contract unit leased to the family must be appropriate for the size of the family based on ECC/HANH's subsidy standards.

# 5-II.C. EXCEPTIONS TO SUBSIDY STANDARDS

No changes to this section.

# 5-II.D. VOUCHER ISSUANCE [24 CFR 982.302]

This section does not apply to the standard or RAD PBV programs.

# 5-II.E. VOUCHER TERM, EXTENSIONS, AND SUSPENSIONS

This section does not apply to the standard or RAD PBV programs.

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# Chapter 19

#### **SECTION VI**

#### INCOME AND SUBSIDY DETERMINATIONS

[24 CFR Part 5, Subparts E and F; 24 CFR 982]

#### INTRODUCTION

A family's income determines eligibility for assistance and is also used to calculate the family's payment and ECC/HANH'S subsidy. ECC/HANH will use the policies and methods described in this chapter to ensure that only eligible families receive assistance and that no family pays more or less than its obligation under the regulations.

### **Addition:**

For LIHTC/PBV and RAD/PBV, rent redetermination will be completed annually in compliance with LIHTC guidelines.

#### **PART I: ANNUAL INCOME**

## 6-I.A. OVERVIEW

No changes to this section:

#### 6-I.B. HOUSEHOLD COMPOSITION AND INCOME

No changes to this section, with the following exception:

Full-time students 18 years of age or older (not head, spouse, or co-head) All employment income is excluded, except \$480 [24 CFR 5.609(c)(11)].

### **Temporarily Absent Family Members**

No changes to this section

Absent Students

No changes to this section

Absences Due to Placement in Foster Care

No changes to this section

Absent Head, Spouse, or Co-head

No changes to this section

# Family Members Permanently Confined for Medical Reasons

No changes to this section

## **Joint Custody of Dependents**

No changes to this section

#### Caretakers for a Child

No changes to this section

#### 6-I.C. ANTICIPATING ANNUAL INCOME

No changes to this section for the standard or RAD PBV programs.

For the LIHTC program:

The LIHTC file should instead follow the HUD Handbook 4350.3, REV-1, Chapter 5 as the reference guide to be used for identifying income to be included or excluded when determining annual household income. Additionally, guidance in the Tax Credit Compliance Manual for the state of Connecticut must be considered.

## **Basis of Annual Income Projection**

No changes to this section for the standard or RAD PBV programs.

For the LIHTC program:

For LIHTC files, the policies in this section of the administrative plan do not apply. The LIHTC program follows HUD Handbook 4350.3 REV-1 as the reference guide to be used for identifying income to be included or excluded when determining annual household income. Additionally, guidance in the Tax Credit Compliance Manual for the state of Connecticut must be considered. Generally, the most conservative calculation of anticipated household income should be made to ensure that there is no doubt that a family is income eligible. If a lesser number is warranted, a detailed explanation written in the LIHTC file is encouraged.

For example: A written third-party employment verification that states an individual works between 15 and 25 hours per week. In the LIHTC program, 25 hours would generally be used to annualize income, which would be the most conservative approach. Further, interim recertifications for changes in household income may not be conducted in the LIHTC program. All income for the entire year must be accounted for at the time of the initial certification or annual recertification.

HUD's Enterprise Income Verification (EIV) system and all associated reports may never be present in the LIHTC file. EIV Income Reports may never be used to verify income in the LIHTC program.

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#### 6-I.D. EARNED INCOME

## Types of Earned Income Included in Annual Income

## Wages, including military pay and Related Compensation

No changes to this section for the standard or RAD PBV programs.

For the LIHTC program:

The LIHTC file should follow HUD Handbook 4350.3 REV-1 as the reference guide to be used for identifying income to be included or excluded when determining annual household income. Additionally, guidance in the Tax Credit Compliance Manual for the state of Connecticut must be considered. Generally, the most conservative calculation of anticipated household income should be made to ensure that there is no doubt that a family is income eligible. If a lesser number is warranted, a detailed explanation written in the LIHTC file is encouraged.

All regular pay, special pay and allowances of a member of the Armed Forces, with the exception of hostile fire pay, are included in income. Military basic housing allowances are generally included as income, however, there is an exception if the building is located in any county, or adjacent county, in which a qualified military installation is located. Qualified bases are listed in IRS Notice 2008-79.

# Temporary, Nonrecurring, or Sporadic Income [24 CFR 5.609(c)(9)]

No changes to this section for the standard or RAD PBV programs.

For the LIHTC program:

**Temporary Income**: Temporary income is generally considered excluded income.

**Sporadic or Zero Income**: The IRS states that "the best way to determine whether a prospective tenant is income-qualified is to conduct a detailed interview with the tenant. An interview can be used to follow up on information disclosed on the application, surface information that would not otherwise be known, and help the property manager make an informed decision." A tenant does not need to have income every month, but each month should be accounted for with either an anticipated amount of income, or an explanation of why no income is anticipated and how that month's expenses will be covered. A prior year's tax return and/or paycheck stubs should be used to provide support for the anticipated income amount. Households with zero income must complete the Unemployed or Zero Income Statement (TC-100F) found in the state of Connecticut's LIHTC compliance manual for the LIHTC file.

Children's Earnings

No changes to this section.

Income of a Live-in Aide

No changes to this section.

Income Earned under Certain Federal Programs

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## 6-I.G. ASSETS [24 CFR 5.609(b)(3) and 24 CFR 5.603(b)]

#### Overview

No changes to this section.

#### **General Policies**

No changes to this section for the standard or RAD PBV programs.

For the LIHTC program:

The owner/agent must verify all known income and assets that affect eligibility. However, if the total assets for a household are \$5,000 or less, the applicants may satisfy the asset requirement by signing a statement attesting to such fact.

## Income from Assets

No changes to this section.

# Valuing Assets

No changes to this section.

### Lump-Sum Receipts

No changes to this section.

# Imputing Income from Assets [24 CFR 5.609(b)(3), Notice PIH 2012-29]

No changes to this section for the standard or RAD PBV programs.

For the LIHTC program:

Follow the HUD Handbook 4350.3 REV-1, Chapter 5 for Calculating Income from Assets for the LIHTC program. The owner/agent will not include income from assets unless the total market value of all assets for the family equals **\$5,000 or more.** The owner/agent will then include in annual income the greater of (1) the actual income derived from the assets or (2) the imputed income.

The passbook rate is .06% for the LIHTC program.

# Determining Actual Anticipated Income from Assets

No changes to this section.

## Withdrawal of Cash or Liquidation of Investments

No changes to this section.

#### Jointly Owned Assets

No changes to this section for the standard or RAD PBV programs.

For the LIHTC program:

#### PART II. HAP CONTRACTS

#### 13-II.A. OVERVIEW

This section does not apply to the standard or RAD PBV programs.

Please see Chapter 17 of HANH's Administrative Plan at **PART V HOUSING ASSISTANCE PAYMENTS CONTRACT (HAP)** for the HAP contract used in the standard and RAD PBV programs.

#### 13-ILB. HAP CONTRACT CONTENTS

This section does not apply to the standard or RAD PBV programs.

Please see Chapter 17 of HANH's Administrative Plan at PART V HOUSING ASSISTANCE PAYMENTS CONTRACT (HAP) for the HAP contract used in the standard and RAD PBV programs.

#### 13-II.C. HAP CONTRACT PAYMENTS

#### General

This section does not apply to the standard or RAD PBV programs.

Please see Chapter 17 of HANH's Administrative Plan at **PART IX PAYMENTS TO OWNER** for the how housing assistance payments are calculated to the owner in the standard and RAD PBV programs.

# **Owner Certification of Compliance**

This section does not apply to the standard or RAD PBV programs.

Please see Chapter 17 of HANH's Administrative Plan at **PART IX PAYMENTS TO OWNER** for the how housing assistance payments are calculated to the owner in the standard and RAD PBV programs.

## Late HAP Payments [24 CFR 982.451(a) (5)]

No changes to this section.

## **Termination of HAP Payments [24 CFR 982.311(b)]**

No changes to this section.

# 13-II.D. BREACH OF HAP CONTRACT [24 CFR 982.453]

No changes to this section.

Please see Chapter 17 of HANH's Administrative Plan at **PART V HOUSING ASSISTANCE PAYMENTS CONTRACT (HAP)** for HAP contract terms and ECC/HANH and owner termination of the HAP contract in the standard and RAD PBV programs.

## 13-II.E. HAP CONTRACT TERM AND TERMINATIONS

This section does not apply to the standard or RAD PBV programs.

Please see Chapter 17 of HANH's Administrative Plan at **PART V HOUSING ASSISTANCE PAYMENTS CONTRACT (HAP)** for HAP contract terms and ECC/HANH and owner termination of the HAP contract in the standard and RAD PBV programs.

# 13-II.F. CHANGE IN OWNERSHIP / ASSIGNMENT OF THE HAP CONTRACT [HUD-52641]

This section does not apply to the standard or RAD PBV programs.

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## Chapter 19

#### **SECTION XIV**

#### **PROGRAM INTEGRITY**

#### INTRODUCTION

No changes to this section for the standard or RAD PBV programs.

While neither the IRS Code nor the state of Connecticut's LIHTC compliance manual discuss program integrity, the owner may follow policies in the admin plan for program integrity for the LIHTC file, provided they do not violate any LIHTC requirements.

For the LIHTC program, add:

Neither IRS Code nor the state of Connecticut's LIHTC compliance manual discuss program integrity. The Guide for Completing Form 8823 states that LIHTC owners should demonstrate due diligence to prevent tenant fraud. If misrepresentation is suspected, additional steps should be taken to verify the accuracy of information provided by the tenant. The IRS does not consider reportable noncompliance to have occurred if tenant fraud is discovered and addressed by the owner prior to a state agency review or an IRS audit, and the owner satisfies the state agency that:

- The tenant provided false information;
- The owner did everything a prudent person would do to avoid fraudulent tenants (due diligence) and has implemented any needed changes to avoid future problems;
- The tenant has vacated the unit (if possible); and
- There is no pattern of accepting fraudulent tenants

An owner's opportunity to identify and self-correct misrepresentations or fraud by a tenant terminates upon notification of a state agency's intended review/inspection of the LIHTC project. Any noncompliance arising from such a misrepresentation or fraud discovered during a state agency's review/inspection should be reported to the IRS on Form 8823 under the appropriate category of noncompliance, regardless of the cause.

# PART I: PREVENTING, DETECTING, AND INVESTIGATING ERRORS AND PROGRAM ABUSE

#### 14-I.A. PREVENTING ERRORS AND PROGRAM ABUSE

No changes to this section.

#### 14-I.B. DETECTING ERRORS AND PROGRAM ABUSE

No changes to this section.

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## **Independent Audits and HUD Monitoring**

No changes to this section.

# **Individual Reporting of Possible Errors and Program Abuse**

No changes to this section.

#### 14-I.C. INVESTIGATING ERRORS AND PROGRAM ABUSE

## When ECC/HANH Will Investigate

No changes to this section.

# Consent to Release of Information [24 CFR 982.516]

No changes to this section.

# **Analysis and Findings**

No changes to this section.

#### **Consideration of Remedies**

No changes to this section.

# **Notice and Appeals**

No changes to this section.

#### PART II: CORRECTIVE MEASURES AND PENALTIES

### 14-II.A. SUBSIDY UNDER- OR OVERPAYMENTS

#### **Corrections**

No changes to this section.

### Reimbursement

No changes to this section.

## 14-II.B. FAMILY-CAUSED ERRORS AND PROGRAM ABUSE

No changes to this section.

# Family Reimbursement to ECC/HANH [HCV GB pp. 22-12 to 22-13]

No changes to this section.

# ECC/HANH Reimbursement to Family [HCV GB p. 22-12]

No changes to this section.

#### **Prohibited Actions**

No changes to this section.

## **Penalties for Program Abuse**

No changes to this section.

#### 14-II.C. OWNER-CAUSED ERROR OR PROGRAM ABUSE

No changes to this section.

#### **Owner Reimbursement to ECC/HANH**

No changes to this section.

#### **Prohibited Owner Actions**

No changes to this section.

#### **Remedies and Penalties**

No changes to this section.

#### 14-II.D. ECC/HANH-CAUSED ERRORS OR PROGRAM ABUSE

For the standard and RAD PBV programs, the paragraph is amended to read:

The responsibilities and expectations of ECC/HANH staff with respect to normal program administration are discussed throughout this plan. This section specifically addresses actions of an ECC/HANH staff member that are considered errors or program abuse related to the HCV program. Additional standards of conduct may be provided in the ECC/HANH personnel policy.

ECC/HANH-caused incorrect subsidy determinations include (1) failing to correctly apply HCV rules regarding family composition, income, assets, and expenses, (2) assigning the incorrect voucher size to a family, (3) errors in calculation.

#### Repayment to the ECC/HANH

#### **ECC/HANH Reimbursement to Family or Owner**

No changes to this section.

#### **Prohibited Activities**

No changes to this section.

# 14-II.E. CRIMINAL PROSECUTION

No changes to this section.

# 14-II.F. FRAUD AND PROGRAM ABUSE RECOVERIES

No changes to this section.

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# ECC/HANH Policy

## Option 1

#### Three-Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion 33% of difference between most recently paid TTP or flat rent and the standard TTP.
- Year 2: Annual recertification and any interim recertification prior to Year 3 annual recertification 66% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 annual recertification and all subsequent recertifications Full standard TTP.

## Option 2

#### Five-Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion 20% of difference between most recently paid TTP or flat rent and the standard TTP.
- Year 2: Annual recertification and any interim recertification prior to Year 3 annual recertification 40% of difference between most recently paid TTP and the standard TTP.
- Year 3: Annual recertification and any interim recertification prior to Year 4 AR 60% of difference between most recently paid TTP and the standard TTP.
- Year 4: Annual recertification and any interim recertification prior to Year 5 annual recertification 80% of difference between most recently paid TTP and the standard TTP.
- Year 5 annual recertification- Full standard TTP

## **Tenant and ECC/HANH Responsibilities**

No changes to this section.

#### **Utility Reimbursements**

No changes to this section.

## 17-X.D. OTHER FEES AND CHARGES [24 CFR 983.354]

No changes to this section.

## Other Charges by Owner

No changes to this section.



#### MEMORANDUM

TO: Board of Commissioners

DATE: November 18, 2025

FROM: Shenae Draughn, President

RE: Resolution Authorizing a Memorandum of Understanding between Haven's Harvest and

Housing Authority of the City of New Haven (d/b/a Elm City Communities) to coordinate the rescue and redistribution of surplus food during the period of November 24, 2025 to

**December 31, 2026** 

ACTION: Recommend that the Board of Commissioners adopt Resolution

Number #11-86/25-R

TIMING: Immediately

DISCUSSION: Haven's Harvest is a nonprofit organization committed to reducing food waste

and addressing food insecurity throughout New Haven and surrounding

communities. Since its founding in 2015, the organization has recovered surplus food from local farms, grocery stores, and food service providers, and redirecting it to community-based organizations that serve individuals and families in need.

Through these relationships, Haven's Harvest not only provides consistent access to nutritious food but also fosters collaboration and education around sustainability and resource efficiency. Each year, the organization delivers thousands of pounds of surplus prepared foods and fresh produce to designated

sites, strengthening local food systems and advancing equitable access to healthy meals for all residents.

Haven's Harvest and HANH will work together to provide and distribute the

surplus of food to residents of the Housing Authority.

HANH seeks authorization of a Memorandum of Understanding between Haven's

Harvest and Housing Authority of the City of New Haven (d/b/a Elm City

Communities) to coordinate the rescue and redistribution of surplus food during

the period of November 24, 2025 to December 31, 2026.

FISCAL IMPACT: \$0

SOURCE OF FUNDS: N/A

STAFF: LaToya Mills, Director of CED



# HOUSING AUTHORITY OF THE CITY OF NEW HAVEN (d/b/a Elm City Communities) RESOLUTION #11-86/25-R

Resolution Authorizing a Memorandum of Understanding between Haven's Harvest and Housing Authority of the City of New Haven (d/b/a Elm City Communities) to coordinate the rescue and redistribution of surplus food during the period of November 24, 2025 to December 31, 2026

**WHEREAS**, Haven's Harvest is a nonprofit organization committed to reducing food waste and addressing food insecurity throughout New Haven and surrounding communities, and since its founding in 2015, it has recovered surplus food from local farms, grocery stores, and food service providers, and redirecting it to community-based organizations that serve individuals and families in need; and

**WHEREAS**, through these relationships, Haven's Harvest not only provides consistent access to nutritious food but also fosters collaboration and education around sustainability and resource efficiency. Each year, the organization delivers thousands of pounds of surplus prepared foods and fresh produce to designated sites, strengthening local food systems and advancing equitable access to healthy meals for all residents; and

**WHEREAS**, the Housing Authority is committed to working with Haven's Harvest to redistribute the surplus of food; and

**WHEREAS**, the Housing Authority seeks to strengthen community collaborations that bridge the gap to food for individuals and families; and

**WHEREAS**, Haven's Harvest and the Housing Authority share a common goal of reducing food waste and addressing food insecurities of HANH residents and around the city; and

WHEREAS, Haven's Harvest will focus on the coordination and logistics of food delivery; and

**WHEREAS**, the Housing Authority will coordinate the distribution to HANH residents and HANH sites; and

**WHEREAS**, Haven's Harvest will provide, transport and distribute food in compliance with safety standards; and

WHEREAS, Haven's Harvest will supply volunteers and logistical resources; and

WHEREAS, Haven's Harvest will maintain accurate records of deliveries and participants; and

**WHEREAS**, in accordance with resolution 10-129/18-R for the Revised Procurement Policy adopted by the Board of Commissioners on October 16, 2018, all contracts greater than \$150,000.00 inclusive of all optional years and all Change Orders and amendments in excess of 10% or \$50,000 (whichever is higher) and which results in a total contract greater than \$150,000 must be authorized by the Board of Commissioners.



# NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF NEW HAVEN, THAT:

- A Memorandum of Understanding between Haven's Harvest and Housing Authority of the City of New Haven (d/b/a Elm City Communities) to coordinate the rescue and redistribution of surplus food consistent with the recitals set forth hereinabove, be and hereby is authorized and directed; and
- 2. The President be and hereby is authorized, empowered and directed to take any and all such action necessary and appropriate to fulfill the foregoing purposes, to execute and deliver such agreements, documents and instruments as necessary to fulfill the foregoing purposes, and to take any and all such action ancillary, related and or/necessary action to fulfill the foregoing purposes and the purposes of this Resolution; and
- 3. This Resolution shall take effect immediately.

I hereby certify that the above resolution was adopted by a majority of the Commissioners present at a meeting duly called at which a quorum was present, on November 18, 2025.

		Shenae Draughn Secretary/President
		Date
MC	VIEWED: CCARTER & ENGLISH, LLP :NERAL COUNSEL	
Ву:		
,	Rolan Joni Young, Esq. A Partner	



# HOUSING AUTHORITY OF THE CITY OF NEW HAVEN (d/b/a Elm City Communities) RESOLUTION #11-86/25-R

Resolution Authorizing a Memorandum of Understanding between Haven's Harvest and Housing Authority of the City Of New Haven (d/b/a Elm City Communities) to coordinate the rescue and redistribution of surplus food during the period of November 24, 2025 to December 31, 2026

**WHEREAS**, Haven's Harvest is a nonprofit organization committed to reducing food waste and addressing food insecurity throughout New Haven and surrounding communities, and since its founding in 2015, the has recovered surplus food from local farms, grocery stores, and food service providers, and redirecting it to community-based organizations that serve individuals and families in need; and

**WHEREAS**, through these relationships, Haven's Harvest not only provides consistent access to nutritious food but also fosters collaboration and education around sustainability and resource efficiency. Each year, the organization delivers thousands of pounds of surplus prepared foods and fresh produce to designated sites, strengthening local food systems and advancing equitable access to healthy meals for all residents; and

**WHEREAS**, the Housing Authority is committed to working with Haven's Harvest to redistribute the surplus of food; and

**WHEREAS**, the Housing Authority seeks to strengthen community collaborations that bridge the gap to food for individuals and families; and

**WHEREAS**, Haven's Harvest and the Housing Authority share a common goal of reducing food waste and addressing food insecurities of HANH residents and around the city; and

WHEREAS, Haven's Harvest will focus on the coordination and logistics of food delivery; and

**WHEREAS**, the Housing Authority will coordinate the distribution to HANH residents and HANH sites; and

**WHEREAS**, Haven's Harvest will provide, transport and distribute food in compliance with safety standards; and

WHEREAS, Haven's Harvest will supply volunteers and logistical resources; and

WHEREAS, Haven's Harvest will maintain accurate records of deliveries and participants; and

**WHEREAS**, in accordance with resolution 10-129/18-R for the Revised Procurement Policy adopted by the Board of Commissioners on October 16, 2018, all contracts greater than \$150,000.00 inclusive of all optional years and all Change Orders and amendments in excess of 10% or \$50,000 (whichever is higher) and which results in a total contract greater than \$150,000 must be authorized by the Board of Commissioners.

### MEMORANDUM OF UNDERSTANDING (MOU)

Between
The Housing Authority of New Haven (HANH)
and
Haven's Harvest

Effective Date: November 24, 2025 Duration: Until December 31, 2026

#### I. History of Haven's Harvest

Haven's Harvest is a nonprofit organization dedicated to rescuing surplus food and distributing it to those in need throughout New Haven and surrounding communities. Since its founding in 2015, Haven's Harvest has focused on reducing food waste while addressing food insecurity by partnering with local farms, grocery stores, and community organizations. The organization has grown to serve thousands of residents annually, recovering and delivering surplus prepared food, produce, and other items to community-based organizations serving residents, while fostering community learning about food waste reduction and sustainability.

### II. Purpose

To formalize collaboration between HANH and Haven's Harvest to promote wellness, strengthen community partnerships, and improve resident food access, as Haven's Harvest is an environmental nonprofit that coordinates the rescue and redistribution of surplus food.

#### III. Scope

Haven's Harvest focuses on the coordination and logistics of food delivery, while HANH will coordinate distribution to HANH residents and HANH sites.

#### IV. Roles and Responsibilities

HANH:

- 1. Provide distribution locations and outreach support.
- 2. Coordinate logistics and safety compliance.
- 3. Assist in reporting and communication.

#### Haven's Harvest:

1. Provide, transport, and distribute food in compliance with safety standards.

- 2. Supply volunteers and logistical resources.
- 3. Maintain accurate records of deliveries and participants.

# V. Mutual Agreements

Both parties commit to open communication, data collection, and continuous improvement through periodic reviews.

### VI. Liability and Indemnification

Each organization remains responsible for its own acts, employees, and volunteers. Both will maintain insurance and comply with applicable health and safety laws.

## VII. Confidentiality and Data Sharing

Information shared will be used solely for program coordination and evaluation. Personally identifiable data will remain confidential per federal, state, and local privacy laws.

# VIII. Reporting and Evaluation

Parties will jointly track attendance, frequency, and outcomes to measure impact and guide program improvements.

#### IX. Non-Discrimination

Both organizations agree to operate programs and provide services without discrimination based on race, color, religion, sex, gender identity, sexual orientation, national origin, disability, age, or any other protected status under applicable law. All participants will be treated with dignity and respect.

#### X. Publicity and Branding

Both parties agree to recognize each other appropriately in public communications and outreach related to this partnership. Use of logos or branding materials requires prior written consent. All publicity will accurately reflect the collaborative nature of the partnership.

#### XI. Term and Termination

Date: \_\_\_\_\_

XII Signatures

Effective on the above date and valid for the stated duration unless modified or terminated with 30 days' written notice. Amendments require mutual written consent.

For the Housing Authority of New Haven (HANH)
Name:
Title:
Signature:

For Haven's Harvest:	
Name:	_
Title:	
Signature:	_
Date:	



## **MEMORANDUM**

TO: Board of Commissioners

DATE: November 18, 2025

FROM: Shenae Draughn, President

RE: Resolution Authorizing A Contract Award To The Computer Company (TCC)

For A Period Of Five (5) Years Beginning January 1, 2026 And Ending

December 3, 2030 For a Not To Exceed Amount Of \$3,205,776.00 To Provide

**Outsourced IT And Infrastructure Services** 

ACTION: Recommend that the Board of Commissioners adopt Resolution

Number # 11-87/25-R

TIMING: Immediately

DISCUSSION: On July 2, 2025 ECC/HANH issued Solicitation Number AD-25-RFP-2027

for IT Outsourced Infrastructure. The services included in the solicitation were, security, reliability, cybersecurity, data center/cloud services, remote office support, business continuity and various additional IT services standard with infrastructure management, and includes providing cybersecurity training, technical support, web hosting, and a range of additional services tailored to ECC's needs. Bids were due on

August 22, 2025.

The solicitation resulted in two responses, one from ConsultAdd, Inc. and one from The Computer Company, LLC. Based on the scope of work, The Computer Company LLC provided the most responsive and responsible bid.

This resolution is seeking authorization of a contract award to The Computer Company for a period of five (5) years beginning January 1, 2026 and ending December 31,2030 for a not to exceed amount of \$3,205,776.00.

In accordance with resolution 10-129/18-R for the Revised Procurement Policy, adopted by the Board of Commissioners on October 16, 2018, all Contracts greater than \$150,000.00 inclusive of all optional years and all Change Orders and amendments in excess of 10% or \$50,000.00 (whichever is higher) and which results in a total contract greater than \$150,000.00 must be authorized by the Board of Commissioners prior to execution.



FISCAL IMPACT: \$3,205,776.00 Operating Funds available

STAFF: Donna Piccirilli, VP Information Technology/CIO



# ELM CITY COMMUNITIES Housing Authority of the City of New Haven

## **RESOLUTION #11-87/25-R**

Resolution Authorizing A Contract Award To The Computer Company (TCC) For A Period Of Five (5) Years Beginning January 1, 2026 And Ending December 3, 2030 For a Not To Exceed Amount Of \$3,205,776.00 To Provide Outsourced IT And Infrastructure Services

WHEREAS, on July 2, 2025, ECC/HANH issued an RFP for Outsourced IT and Infrastructure, and received two responses, one from ConsultAdd, Inc. and one from The Computer Company, LLC.; and

WHEREAS, the Computer Company provided the most responsive and responsible proposal to the RFP; and

WHEREAS, this resolution is seeking authorization of a contract award to The Computer Company for Outsourced IT and Infrastructure Services for a period of five (5) years beginning January 1,2026 and ending December 31, 2030 for a not to exceed amount of \$3,205,776.00; and

WHEREAS, in accordance with resolution 10-129/18-R for the Revised Procurement Policy, adopted by the Board of Commissioners on October 16, 2018, all Contracts greater than \$150,000.00 inclusive of all optional years and all Change Orders and amendments in excess of 10% or \$50,000.00 (whichever is higher) and which results in a total contract greater than \$150,000.00 must be authorized by the Board of Commissioners prior to execution.

# NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF NEW HAVEN THAT:

- The award of a contract to The Computer Company for a period of five (5) years beginning January 1, 2026 and ending December 31, 2030 in a not to exceed amount of \$3,205,776.00 for Outsourced IT and Infrastructure Services, be and hereby is authorized and directed, including the expenditure of the aforesaid amount; and
- 2. The Executive Director be and hereby is authorized, empowered, and directed to execute and deliver such documents, agreements and instruments, and to take any and all such action ancillary, related and or/necessary action to fulfill the foregoing purposes and the purposes of this Resolution; and
- 3. This Resolution shall take effect immediately.



I hereby certify that the above resolution was adopted by a majority of the Commissioners present at a meeting duly called at which a quorum was present, on November 18, 2025.

	Shenae Draughn, President
	Date
REVIEWED: McCarter & English, LLP General Counsel	
By Rolan Joni Young, Esq, Esq A Partner	



#### **MEMORANDUM**

TO: Board of Commissioners

DATE: November 18, 2025

FROM: Shenae Draughn, President

RE: Resolution Authorizing Award Of A Contract To The Computer Company (TCC)

For A Period Of 5 Years Beginning January 1,2026 And Ending December 3, 2030 In The Not To Exceed Amount Of \$3,205,776.00 To Provide Outsourced It

**And Infrastructure Services** 

ACTION: Recommend that the Board of Commissioners adopt Resolution

Number # 11-87/25-R

TIMING: Immediately

DISCUSSION: On July 2, 2025 ECC/HANH issued Solicitation Number AD-25-RFP-2027

for IT Outsourced Infrastructure. The services included in the

solicitation were, security, reliability, cybersecurity, data center/cloud

services, remote office support, business continuity and various additional IT services standard with infrastructure management, and includes providing cybersecurity training, technical support, web hosting, and a range of additional services tailored to ECC's needs.

Bids were due on August 22, 2025.

The solicitation resulted in two responses, one from ConsultAdd, Inc. and one from The Computer Company, LLC. Based on the scope of work, The Computer Company LLC provided the most responsive and responsible bid.

This resolution is seeking authorization of the award of the contract to The Computer Company for a period of 5 years beginning January 1,2026 and ending December 31,2030 in the not to exceed amount of \$3,205,776.00.

In accordance with resolution 10-129/18-R for the Revised Procurement Policy, adopted by the Board of Commissioners on October 16, 2018, all Contracts greater than \$150,000.00 inclusive of all optional years and all Change Orders and amendments in excess of 10% or \$50,000.00 (whichever is higher) and which results in a total contract greater than \$150,000.00 must be authorized by the Board of Commissioners prior to execution.



ECC/ HANH staff is recommending that the Board of Commissioners authorize a contract with The Computer Company for a period of 5 years beginning January 1,2026 and ending December 31,2030 in the not to exceed amount of \$3,205,776.00.

FISCAL IMPACT: \$3,205,776.00 Operating Funds available

STAFF: Donna Piccirilli, VP Information Technology/CIO



## ELM CITY COMMUNITIES Housing Authority of the City of New Haven

#### **RESOLUTION #11-87/25-R**

# RESOLUTION AUTHORIZING AWARD OF A CONTRACT TO THE COMPUTER COMPANY (TCC) FOR A PERIOD OF 5 YEARS BEGINNING JANUARY 1, 2026 AND ENDING DECEMBER 3,2030 IN THE NOT TO EXCEED AMOUNT OF \$3,205,776.00 TO PROVIDE OUTSOURCED IT AND INFRASTRUCTURE SERVICES

WHEREAS, on July 2, 2025 ECC/HANH issued an RFP for IT Outsourced Infrastructure, and received two responses, one from ConsultAdd, Inc. and one from The Computer Company, LLC.; and

WHEREAS, the Computer Company provided the most responsive and responsible proposal to the RFP; and

WHEREAS, this resolution is seeking authorization of the award of a contract to The Computer Company for IT Infrastructure Services for a period of 5 years beginning January 1,2026 and ending December 31,2030 in the not to exceed \$3,205,776.00; and

WHEREAS, in accordance with resolution 10-129/18-R for the Revised Procurement Policy, adopted by the Board of Commissioners on October 16, 2018, all Contracts greater than \$150,000.00 inclusive of all optional years and all Change Orders and amendments in excess of 10% or \$50,000.00 (whichever is higher) and which results in a total contract greater than \$150,000.00 must be authorized by the Board of Commissioners prior to execution.

### NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF NEW HAVEN THAT:

- 1. The award of a contract to The Computer Company for a period of 5 years beginning January 1,2026 and ending December 31,2030 in the not to exceed amount of \$3,205,776.00 for IT Infrastructure Services, be and hereby is authorized and directed, including the expenditure of the aforesaid amount; and
- 2. The Executive Director be and hereby is authorized, empowered, and directed to execute and deliver such documents, agreements and instruments, and to take any and all such action ancillary, related and or/necessary action to fulfill the foregoing purposes and the purposes of this Resolution; and
- 3. This Resolution shall take effect immediately.



## AD-25-RFP-2027 Request for Proposals

IT Outsourced Help Desk and Infrastructure

Issue Date: July 2, 2025

Shenae Draughn President



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#### Part I. Solicitation Information

#### A. Description of Services

The Housing Authority of the City of New Haven d/b/a Elm City Communities (ECC) is seeking proposals for Managed Technology Services. The scope of these services will include Infrastructure and Help Desk.

While this RFP is meant to promote competitive pricing, ECC prefers to have a single source for all services specified within this document but recognizes the complexity and variety may require multiple service providers to complete the entire scope of the RFP. When subcontracting, ECC expects to have a single point of contact regardless of the number of collaborative partners, full disclosure is required related to all subcontractors. Service providers must quote all components.

All ECC data is highly sensitive and must be kept secure and strictly confidential. The selected contractor will be subject to a Confidentiality Agreement.

#### B. Important Due Dates/Locations/Time

Schedule		
Event	Date	
RFP Issued	July 2, 2025 at 3:00PM	
Pre-Proposal Conference	July 30, 2025 at 11:00AM	
Questions Due	August 1, 2025 at 12:00PM	
Proposals Submittal Deadline	August 22, 2025 at 3:00PM	

A Pre-Proposal Conference is scheduled for July 30, 2025, at 11:00 A.M. ONLY via conference call. Conference call link is attached as a separate document. Attendance is not mandatory but is recommended.

All questions concerning this RFP must be submitted in writing no later than August 1, 2025, 12:00 p.m. EST using the Elm City Communities Collaboration Portal website: <a href="https://newhavenhousing.cobblestonesystems.com/gateway">https://newhavenhousing.cobblestonesystems.com/gateway</a>. In order to submit questions, you must register as an Interested Respondent.

Once the question period has ended, all responses to questions will be posted as an addendum and posted on Elm City Communities Collaboration Portal website:

<a href="https://newhavenhousing.cobblestonesystems.com/gateway">https://newhavenhousing.cobblestonesystems.com/gateway</a>. All Addenda's must be acknowledged with a signature and timely submitted as part of this solicitation. Bids will be rejected if the addendum is not timely submitted as stated.



#### C. Preparation of Submission:

Respondent must submit ONE complete file and must be uploaded via the Elm City Communities Collaboration Portal website <a href="https://newhavenhousing.cobblestonesystems.com/gateway">https://newhavenhousing.cobblestonesystems.com/gateway</a>.

- 1. One file that contains your proposal in response to the RFP.
- One file that contains your Cost Estimate on the form included in the RFP requirements.

Directions for uploading are included in this solicitation as a separate download document.

Caution: Late Proposal submission will be handled in accordance with the provisions contained in HUD Form HUD 5369-B Titled "LATE SUBMISSIONS, MODIFICATIONS, AND WITHDRAWALS OF OFFERS".

Persons wishing to receive copies via overnight delivery are responsible for making all arrangements and paying related costs. All cost related to the preparation of this RFP and any related activities are the responsibility of the Offeror. ECC/HANH does not assume any liability for any cost incurred by the Offeror throughout the entire selection process.

All proposals submitted must conform to the requirements specified in the Instructions to Offerors, General Contract Conditions, and any/all other requirements contained herein, all of which form a part of the Request for Proposals by reference.

ECC/HANH reserves the right to postpone or cancel this RFP, to reject, in whole or in part, any and all proposals, to re-advertise for new proposals, and/or to not award any agreement pursuant to the RFP requirements if ECC/HANH deems it's in their best interest to do so. ECC/HANH further reserves the right to waive any minor informality, or the failure of any bidder to comply there with, if it is in the public interest to do so.

ECC/HANH will reject the proposal of any bidder who is suspended and/or debarred by HUD from providing services to public housing authorities and reserves the right to reject the proposal of any who has previously failed to perform any contract properly for ECC/HANH, or any instrumentality thereof.

ECC reserves the right to select more than one respondent, to select respondents for specific task/items, or to defer selection to a later date.

ECC reserves the right to reject any respondents received solely on the basis of past poor performance as reported by the references or otherwise known to ECC.

#### Release of Information

No information related to this RFP will be released prior to contract award.

ECC RESERVES THE RIGHT TO

- 1. Request additional information as part of the selection process
- 2. Request an interview as part of the selection process
- 3. Negotiate fee and or pricing schedule



#### Part II. Bid Protest

Disagreements over the award of a HANH contract, referred to as protests, may occasionally arise between the PHA and an offeror. Usually, the protestor asserts that he/she should have received the contract award and alleges that HANH did not conduct the competition appropriately. (Note: While protests are commonly referred to as bid protests, any type of contract award, including small purchase, competitive proposal, or sealed bid, may be protested by an unsuccessful offeror.) HANH, in accordance with sound business judgment, is responsible for the settlement of protests arising from the procurement process.

1. **Designation of Protest Officials**. The Contracting Officer shall be responsible for the receipt of any form bid protest in writing and with conducting the initial bid protest hearing. Bid protest must be submitted within ten (10) days of the award of contract by the Authority.

The Contracting Officer shall render an impartial decision regarding any bid protest.

- 2. Appeal of Initial Bid Protest Decision. If the Contracting Officer denies the bid offeror's bid protest, the protestor must request an appeal of said finding in writing no later than ten (10) days of the date of receipt of the decision of the Contracting Officer. The appeal hearing will be conducted by no less than two (2) members of the Board of Commissioners (i.e., the Service Committee or the Planning and Development Committee.) The request for an appeal hearing shall be directed to the Contracting Officer.
- 3. Requirements for Written Protests. Protestors shall submit a bid protest in writing to the Contracting Officer within ten (10) days of the award of the subject contract by the Authority to the following address. Protest against terms of the solicitation must be made prior to the due date of solicitation.

Contracting Officer 360 Orange Street 3rd Floor New Haven, CT 06511

The bid protest must clearly state the basis for the protest. Protests should include, at a minimum, the following information:

- a. Name, address, and phone number(s) of the protestor;
- b. Solicitation number and project title;
- c. A detailed statement of the basis for the protest;
- d. Supporting evidence or documents to substantiate any arguments; and
- e. The form of relief requested (e.g., reconsideration of their offer).



- 4. **Submission Time Period**. Generally, the offerer shall submit bid protest no later than ten (10) days of date the award of subject contract is made by the Board of Commissioners. **Protests against the terms of a solicitation should be considered late if submitted after the due date for offers.**
- 5. Time Period for Formal Protest Hearing. The Contracting Officer, or his/her designee, shall conduct a protest hearing, if the written request warrants within ten (10) calendar days of receipt of the writing request by the protestor. The Contracting Officer may deem, based upon the evidence presented by the protestor, that a hearing is not warranted and that an unbiased and impartial initial decision can be rendered without the need of a face to face hearing.
- 6. **Remedial Action.** If a protest is decided in favor of the protestor, HANH may consider, inter alia, the following remedies:

If the contract has not been awarded, the HANH may cancel or revise the solicitation or proposed contract award, or

If the contract has been awarded, the contract may be terminated for convenience and awarded to the protestor, or the procurement may be canceled and offers re-solicited.

- 7. Emergencies or Unusual and Compelling Circumstances. HANH may allow a contract to remain in place despite a successful protest in cases of emergency or unusual or compelling need for the supplies or services. However, if the HANH determines, based on compelling circumstances such as an emergency or serious disruption of its operations, that termination or re-solicitation would not be in the best interest of HANH, then HANH may allow the award to stand and pay the successful protestor costs associated with preparing the bid along with the cost of filing and pursuing the protest and other damages determined.
- 8. **Denials.** HANH shall notify the protestor in writing of its decision and state the basis for the denial. The notification shall apprise the protestor of any appeal rights in accordance with our protest procedures.
- 9. Appeal Procedures. As stated above, appeal of the Contracting Officer's initial decision shall be heard by no fewer than two members of the Board of Commissioners (i.e., the Service Committee or the Planning and Development Committee). The request for an appeal must be made in writing as stated above and must include, but not be limited to:
  - 1. A statement of the factual and legal grounds on which reversal or modification of the decision is deemed warranted, specifying any errors of law made or information not previously considered.
- 10. **Documentation.** The Contracting Officer shall fully document the protest decision in writing in the contract file. Documentation shall include but not be limited to:
  - 1. A copy of the subject solicitation and supporting documentation, including the copy of the advertisement of the bid.
  - 2. A copy of the protestor's written protest.
  - 3. A copy of the written finding of the Contracting Officer and that of any appeal officer(s).



- 4. Copy of documentation used by HANH to make its decisions that was protested by the protestor.
- 11. Informal Resolution Processes. Protestor may request an informal review of their protest either in writing or by phone.

#### **EQUAL EMPLOYMENT OPPORTUNITIES REQUIREMENTS**

All Equal Employment Opportunities including Section 3 (EEO) forms are provided in this package. The contractor/vendor must review all EEO forms, complete and submit the required EEO forms at the time of submission of bid or proposal. Bids/Contracts at all dollar values are subject to Section 3/MBE/WBE requirements.

After a Contract has been awarded, the contractor must attend a mandatory meeting with HANH's Director of Procurement. If there are any questions regarding the completion of the EEO forms please contact the Director of Procurement, at 203-498-8800 ext 1200.

Staff is available at 360 Orange Street, 3rd floor, to assist persons with disabilities. The TTY/TDD number is (203) 497-8434. HANH is an equal opportunity housing agency. HOUSING AUTHORITY OF THE CITY OF NEW HAVEN

Date:

6/30/2025 1:59:16 PM

Shenae Draughn

Shenae Draughn President



#### Part III. Index of Submittal Documents

The INDEX OF SUBMITTAL DOCUMENTS shown below is provided to assist all Offerors in correctly preparing and submitting a responsive RFP HANH in accordance with the requirements of the above RFP. The Index contains a listing of all required submittal items.

Please review this index and submit all documents that are checked "REQUIRED SUBMITTAL" with your proposal. Documents that are checked "SIGNATURE REQUIRED" must be properly executed. Documents that are checked "NOTARY/CORPORATE SEAL REQUIRED" must be notarized and/or have the Bidder's corporate seal affixed.

#### Please view/ download the below listed documents from:

https://newhavenhousing.cobblestonesystems.com/gateway/DocumentLibrary.aspx

INDEX (	OF SUBMITTAL D	OCUMENTS		
DOCUMENT	REQUIRED SUBMITTAL	SIGNATURE REQUIRED	NOTARY/ CORPORATE SEAL REQUIRED	FOR YOUR REVIEW
ALL PROJECTS				
Letter of Interest	Χ	Χ		
Executive Summary	Χ			
Team Experience and Qualifications	Χ			
Offeror's Approach	Χ			
Project Schedule / Availability	Х			
Staffing & Qualifications	Χ			
Sample of Relevant Material	Χ			
Required Acknowledgements and Certifications as listed below:				
Cover Sheet (Attached)	Χ			
Bid Sheet (Attached)	Χ	Χ		
HUD 5369 – Instructions to Offerors				Χ
HUD-5369-C Certifications and Representation of Offerors	X	X		
Reference and Past Performance Form	X			
Acknowledgement of Addenda Form	Х	Х		
ECC Section 3 Clause				Χ
Section 3 Application	X			
General Conditions for Non- Construction- HUD 5370				Х
HUD Form 50071- Certification of Payments to Influence Federal Transactions	X	X		
Non-Collusive Affidavit	Χ	Χ	Х	



#### Part IV. Scope of Service

Scope of Work for Outsourced Infrastructure Management with Cybersecurity, Data Center Services, and Additional IT Support Services

#### 1. Project Overview

This Scope of Work (SOW) outlines the responsibilities and deliverables for outsourced infrastructure management services to be provided for Elm City Communities (ECC). The goal of this engagement is to ensure ECC's IT infrastructure is secure, reliable, and efficiently managed, with a focus on key areas such as cybersecurity, data center/cloud services, remote office support, and various IT services. This includes providing cybersecurity training, technical support, web hosting, and a range of additional services tailored to ECC's needs.

#### 2. Goals and Objectives

- Ensure the stable and optimized performance of IT infrastructure (network, servers, storage, etc.). Support requirements are 24 x 7.
- Provide cybersecurity protection and training for employees to mitigate risks.
- Manage and support data center or cloud-based services.
- Offer flexible support options, including remote office support and onsite technical assistance (in excess of 150 employees).
- Improve operational efficiency through the support of managed services such as print management, UCaaS, and web hosting.
- Deliver responsive support for remote offices (22+ locations) and provide training and proactive maintenance.

#### 3. Services and Deliverables

#### 3.1 Cybersecurity Management & Training

#### Cybersecurity Management:

- Implement and monitor firewalls, antivirus, encryption, and intrusion detection/prevention systems.
- Regular patch management and updates to maintain security across all systems and applications.
- Conduct vulnerability assessments, penetration testing, and recommend security improvements.
- Maintain incident response protocols and provide immediate support in the event of a security breach.



#### Cybersecurity Training:

- Deliver regular, role-based training sessions for employees to raise awareness of phishing, malware, and other security threats.
- Provide specialized training for IT staff on advanced cybersecurity practices and tools.
- Develop ongoing security awareness campaigns and materials for employees.

#### 3.2 Data Center or Cloud Service Management

#### • Data Center Management:

- Manage client-owned data centers or partner with a third-party provider for hosting and maintenance services.
- Oversee hardware provisioning, including servers, storage, and networking equipment.
- Ensure physical and environmental security in the data center, including disaster recovery plans, backup solutions, and business continuity strategies.

#### Cloud Service Management:

- Manage and optimize cloud resources (laaS, PaaS, SaaS) for both public and private cloud environments.
- Optimize resource allocation, ensure cost management, and implement strategies for cloud scaling and elasticity.
- Provide ongoing cloud-based disaster recovery planning and ensure security measures are in place.

#### • Optional Data Center Hosting:

- Offer optional hosting services in client-owned or third-party data centers.
- Support the design, setup, and ongoing management of server infrastructure within the data center.
- Manage and monitor the availability, capacity, and performance of hosted systems.

#### 3.3 Onsite Technical Support

- Provide on-demand technical support to client's on-site teams to address issues such as hardware failures, software installation, troubleshooting, network issues, and other IT-related concerns.
- Support can be delivered on a scheduled or emergency basis, depending on the client's needs.



#### 3.4 Web Development & Hosting

#### Web Development:

- Design, develop, and deploy custom websites, web applications, and content management systems (CMS).
- o Integrate e-commerce solutions, user authentication, and data analytics features as required.
- Provide ongoing website updates, optimizations, and user experience enhancements.

#### • Web Hosting:

- Manage the hosting of client websites, ensuring maximum uptime, security, and speed.
- Regular backups, scalability solutions, and optimization for fast load times and high performance.
- SSL certificate management and domain management.

#### 3.5 UCaaS Management & Support (Including Call Center)

#### • UCaa\$ Management:

- Provide management and support for unified communications systems, including VoIP phone services, instant messaging, video conferencing, and team collaboration tools.
- Monitor and optimize system performance and reliability.
- o Provide end-user support and training on the UCaaS platform.

#### Call Center Support:

- Implement and manage call center technology, including software, hardware, and agents.
- o Monitor and manage call volume, routing, and performance metrics.
- Provide technical support for call center agents and ensure optimal system uptime and functionality.



#### 3.6 Managed Print Services

#### • Print Management:

- Provide centralized print management solutions that reduce costs and improve printer usage efficiency.
- Maintain, monitor, and optimize all printer devices within the organization, ensuring they are operational and cost-effective.
- Handle printer maintenance, including supply management, repairs, and troubleshooting.

#### • Print Optimization:

- o Implement print tracking software to monitor usage and identify opportunities to reduce waste and inefficiencies.
- o Provide regular reports on print costs and usage trends.

#### 3.7 Application Support

- Provide support for lightweight applications (such as office productivity tools, small business software, and custom applications) used by the client's teams.
- Ensure that the applications are running smoothly and help resolve any technical issues that arise.
- Offer software updates, troubleshooting, and user support for application issues.
- Provide support for online document management system (DocuWare).

#### 3.8 Remote Office Support (22+ Locations)

#### • Support for Remote Locations:

- o Provide support for 22+ remote office locations, ensuring each location has reliable access to IT services, systems, and tools.
- Offer remote desktop support, troubleshooting, and maintenance for hardware and software issues in remote offices.
- Manage and secure remote connections, including VPN, remote desktop, and cloud-based tools, ensuring secure and seamless access to the corporate network.

#### Hardware & Software Provisioning:

- o Provision and manage hardware (computers, printers, mobile devices) for remote employees and office locations.
- Ensure software licensing and access to required enterprise applications for remote workers.



#### 3.9 Proactive Reporting and Documentation

#### • Regular Reports:

- Provide regular service reports, including system performance, incident reports, and network security assessments.
- o Include specific metrics on cybersecurity, cloud services, remote office support, and any managed services provided.

#### Documentation:

- Maintain up-to-date documentation for all infrastructure, including system configurations, network topologies, and operational procedures.
- Maintain a disaster recovery and business continuity plan, ensuring it is reviewed and updated regularly.

#### 4. Service Level Agreements (SLAs)

The following SLAs will be adhered to:

- Response Time: Initial response to support requests and incidents within 1 hour.
- Resolution Time: Resolution of critical issues within 4 hours or resolution plan within 4 hours.
- System Uptime: Maintain 99.9% uptime for hosted systems, servers, and services.
- Backup Recovery Time: Ensure data recovery within 24 hours of a failure or outage.

#### 5. Roles and Responsibilities

#### 5.1 Client Responsibilities

- Provide necessary access to systems, servers, and applications for service delivery.
- Share requirements and expectations for the services outlined in this SOW.
- Ensure that end-users comply with cybersecurity policies and training.
- Cooperate with the outsourcing provider on project timelines and milestones.

#### **5.2 Outsourced Provider Responsibilities**

- Provide the necessary infrastructure management, cybersecurity protection, and support services as detailed in the SOW.
- Ensure that service levels and response times are met consistently.
- Deliver ongoing training and support, as well as recommendations for infrastructure optimization and security improvement.



#### 6. Service Fees and Payment Terms

- The pricing for the services will be based on monthly fees. Any additional fees for optional services (e.g., data center hosting, onsite support) will be itemized separately.
- Payments will be made according to the agreed-upon payment schedule outlined in the contract.

#### 7. Duration of Engagement

• This agreement will be effective for 1 year, with an option to renew or extend up to 5 years based on mutual agreement.

#### 8. Confidentiality and Data Protection

 The service provider will comply with data protection regulations (e.g., GDPR, CCPA) and maintain the confidentiality of all client data.

#### 9. Requirements

- Detailed breakdown of costs per service (all 3 categories)
- Monthly and annual pricing options
- Vendor must have SOC2 Type II certification
- Organization must meet NIST 800-171 compliance
- Annual third-party vulnerability scanning must be included (Hosting)
- Setup and onboarding fees from current service provider (if applicable) utilizing onsite tech support
- Transition and onboarding costs and timeline utilizing onsite tech support and network engineering

**10. Conclusion** This SOW sets out the services to be provided for outsourced infrastructure management, cybersecurity, and related IT services. Both parties agree to meet the outlined objectives and deliverables in a collaborative and professional manner.

Please refer to exhibit 1 for current environment.



#### Part V. Submission Requirements

#### a. Proposal Preparation and Submission

Offerors' proposals must be prepared and submitted in such a manner that they address, at a minimum, the requirements of Sections B through L below in appropriate detail. Other preparation and submission requirements may be required by documents contained within Part IV (Scope of Services). It is the Offeror's responsibility to ensure that their proposal submittals properly address all requirements requested by the RFP.

#### b. Letter of Interest

At the beginning of each proposal, the Offeror must provide a letter of interest listing the Offeror's members and identifying the primary contact person. The letter must be signed by an authorized principal of the Offeror's firm and include a statement that the proposal will remain valid for not less than one hundred twenty (120) days from the due date

#### c. Executive Summary

Provide a brief description of no more than two (2) type-written double-spaced pages demonstrating your organization's understanding of the services required by this RFP and how your organization's technical expertise, experience; Public Housing and/or affordable housing, financial resources, proven past performance, and proven managerial processes are consistent with and capable of supporting the specified requirements contained herein.

#### d. Team Experience and Qualifications

- a. Name of Offeror and proposed role.
- b. Main address, telephone/fax numbers and email address of Offeror's place of employment.
- c. Address and telephone number of the office from which services will be provided to the Agency (if different from above).
- d. Contact person, title, telephone/fax numbers and email address.
- e. Description of the size, number of employees and the current workload of the Offeror.
- f. Identify the individual who will serve as Project Manager for the Offeror and who will direct and coordinate the effort to completion.

#### e. Offeror's Approach to Providing Required Services – Work Process

#### Work Process - Please describe:

- a. Process and timing for managing routine support issues
- b. Describe the process and tools used to provide remote support for routine requests.



c. Describe your ability to respond, under urgent or emergency conditions, with limited prior notice.

#### f. Services Plan

The respondent shall describe the manner in which the respondent shall develop, implement, and provide each of the services required in the Scope of Services, Part IV. To be eligible for contract award, the respondent's service plan(s) shall include, at a minimum, the following information:

#### **IT Support Services**

- a. An explanation and description of how the respondent will provide the services required in Part IV.
- b. Approach to consultants and providing/receiving feedback to/from client
- c. A thorough description of items, information, reports, or the like (if any) that the respondent will require from ECC in order to complete the services.
- d. A thorough description of items, information, reports, etc. that the respondent shall provide to ECC in order to keep ECC informed of respondents' performance regarding the services.

#### g. Staffing and Qualifications/ List of Key Personnel

Provide a listing of all key personnel that will be responsible for demonstrating their relevant experience necessary to perform the required services contained herein along with copies of current resumes applicable to each. The Contractor must provide HANH with the qualification of prospective site staff and have at a minimum, five years training and consulting experience. Proof of the firm's Connecticut Professional Registration and Licenses.

#### h. Sample of Relevant Material

Submit samples of any/all charts, documents, forms, etc. that your organization will utilize to perform the required services contained herein.

#### i. Relevant and Past Experience

Offeror(s) must complete ECC's Reference and Past Performance Form

#### j. Required Certifications

All certifications and other required documents shown on the "Index of Submittal Documents Required for RFPs" must be prepared and submitted with Offeror's proposal for the proposal to be considered responsive to the HANH Request for Proposals (RFP)/Solicitation requirements. <u>The minimum amount of time that Offeror's proposal must remain valid is ONE HUNDRED AND TWENTY</u> (120) calendar days from the proposal submittal date.



#### I. Mandatory Clauses

HUD FORM HUD-5370-C (General Conditions for Non-Construction Contracts) and HANH's Supplemental Conditions to HUD Form HUD-5370-C include all clauses mandated by 24 CFR 85.36.



#### Part VI. Evaluation Criteria and Selection Procedures

#### 1. Proposal Evaluation/Contract Award

Evaluation of the responses to this RFP <u>may</u> be evaluated using a two-step process. Step 1 may be used to determine which Offerors' proposals are acceptable or potentially within the acceptable range. During Step 1, a committee will be appointed to evaluate technical proposals in accordance with the evaluation criteria stated in the RFP. The technical evaluation panel or committee performs the review of all technical proposals using the RFP's evaluation criteria.

For the purpose of conducting negotiations, proposals will be initially classified as acceptable, potentially acceptable, or unacceptable. The competitive range decision will consider the evaluation of both technical and cost/price proposals. Proposals determined by the Contracting Officer to be acceptable or potentially acceptable and that have a reasonable chance of award shall be included in the competitive range.

As part of the evaluation process, proposals classified as acceptable and potentially acceptable will be requested to present its proposal and demonstrate the system before the evaluation committee. Any information gained during the presentation(s) may be used in the evaluation of the proposal. Failure to honor this request will be grounds for rejection of the respondent's proposal with no further consideration given.

#### 2. Evaluation Criteria

The evaluation criteria to which each Offeror's submitted proposal will be reviewed, ranked, and scored is as follows. Each proposal has a maximum total possible score of 100 points.

- 1. Evidence of the firm's knowledge and experience (including specific qualifications of personnel assigned to this project). (Max of 30 points)
- 2. Reference of accomplishments demonstrated on similar projects- Excluding ECC including the Housing Authority City of New Haven and any affiliates. (Max of 25 points)
- 3. Quality of proposal to include preliminary concept for process design, facilitation & implementation strategies, and ability to perform according to time frames and deliverables. (Max of 25 points)
- 4. Section 3, MBE and WBE: Responsiveness of the Affirmative Action Plan and Section 3 Plan to HANH's goals and demonstrated evidence of the firm's prior effectiveness in promoting Affirmative Action and Section 3 goals. (Max of 10 points)



5. Compensation structure preference given to the most cost-efficient proposal. (Max of 10 Points)

Proposals will be reviewed by an Evaluation Committee and in accordance with ECC/HANH's Procurement Procedures.

For the purpose of conducting negotiations, proposals will be initially classed as:

- Acceptable (within range of 70-100 points),
- Potentially acceptable (within range of 60-69 points) or
- Unacceptable (within range of 0-59 points).

Proposals determined by ECC/HANH's Contracting Officer to be either acceptable or potentially acceptable and that have a reasonable chance of resulting in a contract award considering their technical evaluation results and their proposed costs will be included in the competitive range. Proposals deemed acceptable or potentially acceptable will be invited for an interview.

Once ECC/HANH has completed the review process, ECC/HANH will enter negotiations with the highest ranked firm selected by the evaluation criteria, with the intention of reaching a best and final offer on a fair and reasonable rate schedule for professional services. If an agreement cannot be reached, ECC/HANH will terminate negotiations with that firm and will proceed to the next-highest ranked firm until rates determined to be fair and reasonable to both parties are obtained. Please note that if negotiations are terminated with a firm, ECC/HANH may not go back to that firm for any additional negotiations – even if the next lower ranked respondent is higher in price.

ECC/HANH will award a contract resulting from this solicitation to the responsible offeror whose offer conforming to the solicitation will be most advantageous to ECC/HANH, cost or price and other factors, specified elsewhere in this solicitation, considered.

#### ECC/HANH may

- 1. Reject any or all offers if such actions are in ECC/HANH's interest,
- 2. Accept other than the lowest offer,
- 3. Waive informalities and minor irregularities in offers received, and
- 4. Award more than one contract for all or part of the requirements stated.

If this solicitation is a request for proposals (RFP), ECC/HANH may award a contract based on initial offers received, without discussion. There, each initial offer should contain the offerors best terms from a cost or price and technical standpoint.

All Offeror(s) must disclose any conflicts of interest, e.g., family member on HANH staff or a resident of public housing or Section 8 (Housing Choice Voucher) in the City of New Haven.

#### Exhibit 1

#### **Managed IT Services**

- 1. Spam Filtering and Email Encryption 250 users
- 2. (300 tickets per month)
- 3. Remote Monitoring and Management (RMM) 250 computers/servers
- 4. Antivirus with EDR 250 devices
- 5. User Training (Microsoft Office 365, Windows, and CoPilot Training)
- 6. Help Desk Ticketing System
- 7. DUO Mobile MFA 250 users
- 8. Cybersecurity Training 250users
- 9. Backups & Offsite Storage 5TB storage for on-premises servers (at datacenter) (Must be AES-256 Bit Encryption)
- 10. Currently Two Full-Time Onsite Helpdesk Technicians, may increase to 2-1/2 and finally 3 (35 hrs/week each technician)
- 11. 24/7 Emergency Support Included
- 12. Network, System/Server, VMware, and Cybersecurity Support Included

#### Infrastructure & Network Support

- 1. Support & Management of Office 365 GCC
- 2. Support & Management of UCaaS
- 3. Development and Support for WordPress Website
- 4. Support for HPe 3PAR Array
- 5. Support for VMware vSphere Environment
- 6. Support for Workstations (Imaging, patching, software deployment)
- 7. Support for Servers (Patching, software deployment, upgrades)
- 8. Support for RDS Gateway and Farm
- 9. Support for Active Directory, DNS, DHCP
- 10. Support for Networking Equipment (VLANs, Firewalls, WAN Providers)
- 11. 22 Sites (22 Firewalls, 29 Switches, 30 Access Points)

#### **Hosting Services**

- 1. WordPress Website Hosting
- 2. Hosting for corporate WordPress website with security and backup solutions.

#### Server Hosting and Backup Solutions

Hosting of the following servers, including:

- 1. Nightly backups (60 days retention)
- 2. Offsite backups (7 days retention)
- 3. West Coast Replication for all VMs in an off-state
- 4. Annual third-party vulnerability scanning

```
| Server | vCPU | RAM | Storage | OS |
|-----|----|----|
| Server 1 | 2 | 8GB | 80GB SSD | Windows 11 |
| Server 2 | 8 | 32GB | 3.6TB SSD | Windows 2019 |
| Server 3 | 4 | 12GB | 8.1TB SSD | Windows 2022 |
| Server 4 | 4 | 12GB | 8.1TB SSD | Windows 2022 |
| Server 5 | 2 | 8GB | 50GB SSD | Windows 2022 |
| Server 6 | 2 | 8GB | 80GB SSD | Windows 2019 |
| Server 7 | 4 | 28GB | 360GB SSD | Windows 2019 |
| Server 8 | 4 | 28GB | 400GB SSD | Windows 2019 |
| Server 9 | 4 | 16GB | 110GB SSD | Windows 2022 |
| Server 10 | 2 | 8GB | 380GB SSD | Windows 2008 |
| Server 11 | 2 | 8GB | 160GB SSD | Windows 2008 |
| Server 12 | 3 | 8GB | 80GB SSD | Windows 2019 |
| Server 13 | 4 | 16GB | 1.6TB SSD | Windows 2019 |
| Server 14 | 4 | 26GB | 128GB SSD | Windows 2022 |
| Server 15 | 4 | 26GB | 256GB SSD | Windows 2022 |
| Server 16 | 4 | 26GB | 128GB SSD | Windows 2022 |
| Server 17 | 4 | 26GB | 128GB SSD | Windows 2022 |
| Server 18 | 4 | 26GB | 128GB SSD | Windows 2022 |
| Server 19 | 4 | 32GB | 9.2TB SSD | Windows 2019 |
| Server 20 | 2 | 6GB | 40GB SSD | Windows 2019 |
| Server 21 | 2 | 8GB | 100GB SSD | Windows 2019 |
| Server 22 | 4 | 16GB | 170GB SSD | Windows 2019 |
| Server 23 | 2 | 8GB | 170GB SSD | Windows 2019 |
| Server 24 | 8 | 32GB | 1.75TB SSD | Windows 2022 |
```

```
| Server 25 | 2 | 8GB | 170GB SSD | Windows 2019 |
| Server 26 | 2 | 16GB | 170GB SSD | Windows 2019 |
| Server 27 | 2 | 4GB | 60GB SSD | Windows 2022 |
| Server 28 | 1 | 4GB | 32GB SSD | Linux |
| Server 29 | 4 | 16GB | 60GB SSD | Windows 10 |
```

#### **Current License Counts**

Product ID ^	Description	Quantity
MS - 365 Power BI Premium	Microsoft Power BI Premium Subscription -Adjust Power BI Premi	20.00
MS - 365 Power BI Pro GCC	Microsoft Power BI Pro GCC Subscription -Share rich data visualiz	75.00
MS - Microsoft 365 G3 GCC	Microsoft 365 G3 GCC Subscription - Productivity Suite -Includes	315.00
MS - Microsoft Teams Room Pro	Microsoft Teams Room Pro -Seamlessly shift to hybrid with Al-po	1.00
MS - Project Plan 3 GCC	Microsoft 365 Project Plan 3 GCC Subscription -Includes Desktop	27.00
MS - Visio Plan 2 GCC	Microsoft 365 Visio Plan 2 GCC Subscription -Includes Desktop V	15.00
Skykick Backup	Skykick Backup for MS365 -Up to Unlimited Retention (Client can	382.00
Software	Stacked Clustered Chart License	20.00



## AD-25-RFP-2027 IT Outsourced Help Desk and Infrastructure

Company Name:
Address:
City, State & Zip Code:
Telephone:
Fax Number:
Contact Person Name:
Email Address:
Date Submitted:

Shenae Draughn President

SPECIFICATIONS	Estimated Yearly Hours	Cost/Hour	Cost Yr 1	Cost Yr 2	Cost Yr 3	Cost Yr 4	Cost Yr 5
IT Outsourced Infrastructure							
**On-Site Technical Support- Estimated 3 fulltime @35 Hours per week	5460	\$					
**Network Engineering Programming	200	\$					
Hosting Services (Data Center & Cloud)	Flat Rate Per Month	\$					
Total			\$	\$	\$	10	
Total 5 Year Contract	\$						

Name of Company
Name and Title of Authorized Signer
Authorized Signer

#### Shenae Draughn, President

#### **MEMORANDUM**

TO: Board of Commissioners

DATE: November 18, 2025

FROM: Shenae Draughn, President

RE: Resolution Authorizing Change Order Number Four (4) to the Contract with Ed the

Treeman, LLC Increasing the Total Not to Exceed Contract Amount by \$55,000.00 Bringing the Total Not to Exceed Contract Amount from \$145,000.00 to

\$200,000.00, for Arborist, Tree Removal and Weed Control Services.

ACTION: Recommend that the Board of Commissioners adopt Resolution Number

#11-88/25-R

TIMING: Immediately

DISCUSSION: HANH has determined a need for arborist, tree removal & weed control

services agency wide. The Ed the Treeman, LLC administers statewide

Commodity Contracts for use by State Department and Local

Governments. Statewide Commodity Contracts are a type of Leverage Procurement Agreements (LPA) used as one of the State's, main procurement vehicles for leveraging its buying power. This objective is accomplished by competitively soliciting quality products by a single lead public agency and making the resulting Contract available to other

public agencies.

The State of Connecticut, through the Department of Administrative Services, has a contract with Ed the Treeman, LLC (Contract #23PSX0100) for arborist, tree removal & weed control services set to expire on May 31,

2026.

On August 22, 2023, HANH approved PO # 22280-3786 with Ed the Treeman, LLC for arborist, tree removal & weed control services beginning August 23, 2023, and ending June 30, 2026, for a not to exceed contract amount of \$40,000.00.

On November 14, 2023, HANH approved Change Order One (1) with Ed the Treeman, LLC for arborist, tree removal & weed control services, for a not to exceed contract amount of \$20,000.00.



On July 24, 2024, HANH approved Change Order Two (2) with Ed the Treeman, LLC for arborist, tree removal & weed control services, for a not to exceed contract amount of \$25,000.00.

On August 28, 2024, HANH approved Change Order Three (3) with Ed the Treeman, LLC for arborist, tree removal & weed control services, for a not to exceed contract amount of \$60,000.00.

ECC/HANH now seeks authorization of Change Order Number Four (4) increasing the not to exceed contract amount by \$55,000.00 bringing the Total Not to Exceed Contract Amount from \$145,000.00 to \$200,000.00, for arborist, tree removal and weed control services.

In accordance with Resolution 10-129/18-R for the Revised Procurement Policy, adopted by the Board of Commissioners on October 16, 2018, all Contracts greater than \$150,000.00 inclusive of all optional years and all Change Orders and amendments in excess of 10% or \$50,000.00 (whichever is higher) and which results in a total contract greater than \$150,000.00 must be authorized by the Board of Commissioners prior to execution.

**FISCAL IMPACT:** \$55,000.00

**SOURCE OF FUNDS**: Operating funds Budgeted for FY 2026

**STAFF:** Lee Purvis, Central Operations Manager



## ELM CITY COMMUNITIES Housing Authority of the City of New Haven

#### Resolution # 11-88/25-R

Resolution Authorizing Change Order Number Four (4) to the Contract with Ed the Treeman, LLC Increasing the Total Not to Exceed Contract Amount by \$55,000.00 Bringing the Total Not to Exceed Contract Amount from \$145,000.00 to \$200,000.00, for Arborist, Tree Removal and Weed Control Services.

WHEREAS, HANH has determined a need for arborist, tree removal & weed control services agency wide; and

WHEREAS, Ed the Treeman, LLC administers statewide Commodity Contracts for use by State Department and Local Governments. Statewide Commodity Contracts are a type of Leverage Procurement Agreements (LPA) used as one of the State's, main procurement vehicles for leveraging its buying power. This objective is accomplished by competitively soliciting quality products by a single lead public agency and making the resulting Contract available to other public agencies; and

WHEREAS, the State of Connecticut, through the Department of Administrative Services, has a contract with Ed the Treeman, LLC (Contract #23PSX0100) for arborist, tree removal & weed control services set to expire on May 31, 2026; and.

WHEREAS, on August 22, 2023, HANH approved PO # 22280-3786 with Ed the Treeman, LLC for arborist, tree removal & weed control services beginning August 23, 2023, and ending June 30, 2026, for a not to exceed contract amount of \$40,000.00; and

WHEREAS, on November 14, 2023, HANH approved Change Order One (1) with Ed the Treeman, LLC for arborist, tree removal & weed control services, for a not to exceed contract amount of \$20,000.00; and

WHEREAS, on July 24, 2024, HANH approved Change Order Two (2) with Ed the Treeman, LLC for arborist, tree removal & weed control services, for a not to exceed contract amount of \$25,000.00.

WHEREAS, on August 28, 2024, HANH approved Change Order Three (3) with Ed the Treeman, LLC for arborist, tree removal & weed control services, for a not to exceed contract amount of \$60,000.00.

WHEREAS, ECC/HANH now seeks authorization of Change Order Number Four (4) increasing the not to exceed contract amount by \$55,000.00 bringing the Total Not to Exceed Contract Amount from \$145,000.00 to \$200,000.00, for arborist, tree removal and weed control; and

WHEREAS, in accordance with Resolution 10-129/18-R for the Revised Procurement Policy, adopted by the Board of Commissioners on October 16, 2018, all Contracts greater than \$150,000.00 inclusive of all optional years and all Change Orders and amendments in excess of 10% or \$50,000.00

(whichever is higher) and which results in a total contract greater than \$150,000.00 must be authorized by the Board of Commissioners prior to execution; and



### NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF NEW HAVEN THAT:

- Change Order Number Four (4) to the agreement with Ed the Treeman increasing the not to exceed contract amount by \$55,000.00 bringing the Total Not to Exceed Contract Amount from \$145,000.00 to \$200,000.00, for arborist, tree removal and weed control services be and hereby is authorized and directed, including the expenditure of the foregoing amount; and
- 2. The President be and hereby is authorized, empowered and directed to execute and deliver such agreements, documents and instruments necessary and appropriate to fulfill the foregoing purposes, and to take any and all such action ancillary, related and or/necessary action to fulfill the foregoing purposes and the purposes of this Resolution, including the expenditure of the aforesaid amount; and
- 3. This Resolution shall take effect immediately.

I hereby certify that the above resolution was adopted by a majority of the Commissioners present at a meeting duly called at which a quorum was present, on November 18, 2025.

	Shenae Draughn Secretary/President	
	Date	
REVIEWED: MCCARTER & ENGLISH, LLP GENERAL COUNSEL		
By: Rolan Joni Young, Esq. A Partner		

#### **Ed The Treeman, LLC Change Order Log**

Date: 08/23/25

Vendor: Ed The Treeman, LLC

Intital Contract Term: 08/23/23 to 05/31/26

Original Contract amount:	Date:	
Change Order #1	22-Aug-23	
Change Order #2	12-Nov-23	
Change Order #3	9-Aug-24	
Change Order #4	18-Nov-25	
Total Contract Value:		

\$40,000.00	
\$20,000.00	
\$25,000.00	
\$60,000.00	
\$55,000.00	
200,000.00	