



U.S. Department of Housing and Urban Development

Omaha Field Office
Edward Zorinsky Federal Building
1616 Capitol Avenue, Suite 329
Omaha, Nebraska 68102-4908

April 20, 2017

Ms. Carolyn Pospisil
Executive Director
Bellevue Housing Authority
8214 Armstrong Circle
Bellevue, NE 68147-1871

Dear Ms. Pospisil:

In accordance with Section 511 of the 1998 Public Housing Reform Act and the implementation of regulations at 24 CFR Part 903, this office has reviewed the Bellevue Housing Authority's (BHA) amended Five Year Public Housing Agency (PHA) Plan submission for Fiscal Year beginning July 1, 2013. Based on our review, the Department of Housing and Urban Development (HUD) has determined your submitted amended PHA Plan has several deficiencies that must be addressed before the Plan can be approved.

PHA Plans are reviewed for: (1) **Completeness** of required information; (2) **Consistency** with the information and data available to HUD, including your jurisdiction(s) consolidated plan; and (3) **Compliance** with the provisions of the public housing reform act or other applicable Federal law. This correspondence outlines the deficiencies identified during the review process and suggested remedies.

Plan Deficiencies and Suggested Remedies

Deficiency 1:

The BHA did not submit the required Form HUD-50077-SL, *Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan*.

Suggested Remedy 1:

Submit the form with the signature of the authorized local official(s).

Deficiency 2:

The amended Plan does not indicate whether the BHA received Board approval or consulted with the appropriate public officials and with the public housing residents in developing the conversion plan.

Suggested Remedy 2:

Please provide a copy of the Board resolution approving the conversion plan. Also, provide a copy of the public hearing with the conversion plan as an agenda item and any public comments received from the housing authority residents (other than RAB members) and/or public officials.

Deficiency 3:

The amended Plan lacks a summary of the conversion plan, which must include the following six components (pursuant to 24 CFR §972.130):

- Identification of Public Housing units
- Identification and obligation status of public housing funds
- Evidence of consultation with public officials
- Evidence of consultation with residents
- Description of PHA's proposed future use of the development
- Relocation plan

Suggested Remedy 3:

Provide a summary of the conversion plan addressing the six components listed above, as an attachment to the amended Plan.

Deficiency 4:

The Plan indicates that Resident Advisory Board (RAB) comments were received, however, there is no attachment or documentation that reflects the date of the meeting and the comments received.

Suggested Remedy 4:

Provide the comments as an attachment. Also include a narrative describing the BHA's analysis of the RAB recommendations and the decisions made on these recommendations.

Deficiency 5:

The Plan does not indicate whether any challenged elements from the RAB were identified. A challenged element is an element of the plan that is challenged by the resident advisory board (RAB) and which cannot be resolved between the RAB and the PHA.

Suggested Remedy 5:

Please identify any challenged elements of the BHA and include all supporting documentation. If there were no challenged elements, please include a statement to that effect.

Deficiency 6:

The plan indicates that the Violence Against Women's Act (VAWA) is included as attachment B, however, there was no attachment with the documentation submitted.

Suggested Remedy 6:

Please submit attachment B as indicated in the Plan.

Deficiency 7:

The *Certification of Compliance with PHA Plans and Related Regulations (Small PHAs)*, form HUD 50077-CRT-SM, was not signed by the BHA's chairperson. Also, the 5-year PHA Plan for fiscal years on the form should be 2013-2017.

Suggested Remedy 7:

Please submit the form with the correct fiscal years and the BHA's chairperson signature as the authorized official.

Deficiency 8:

Attachment A does not contain enough information to identify the funding sources.

Suggested Remedy 8:

Please provide more detailed information to identify the funding sources and dollar amounts noted.

Deficiency 9:

The Plan refers to Attachment C but was not included.

Suggested Remedy 9:

Please submit Attachment C as indicated in the Plan.

Deficiency 10:

The plan does not identify the Capital Fund needs referred to in Attachment C.

Suggested Remedy 10:

Please submit the Physical Needs Assessment identified in the plan.

Deficiency 11:

The HUD Form 50075-5Y identifies the PHA Plan for Fiscal Year Beginning 06/2013; however, the BHA's fiscal year beginning is 07/2013.

Suggested Remedy 11:

Please change the form to reflect the correct fiscal year beginning.

Resubmission

The BHA's amended Plan cannot be approved until our office has received the information and documents as specified above. Please submit the documentation via email no later than May 19, 2017. Please advise me immediately if you will be unable to meet that deadline. Failure to submit the documentation by the requested date will result in denial of the amended Plan.

If you have any questions, please do not hesitate to contact Ms. Julie Steadman, Public Housing Revitalization Specialist, at (402) 492-3115. You may also contact her at Julie.A.Steadman@hud.gov.

Sincerely,



Denise E. Gipson
Director
Office of Public Housing

Cc:
Mr. James Hawkins, Board Chairperson