

SEMAP Corrective Action Plan (AMENDED for FYE 2007)
Housing Authority of the County of Contra Costa (HACCC)
Effective Dates: November 1, 2011 – March 31, 2012

Note: This Corrective Action Plan (CAP) addresses the findings of the confirmatory review of HACCC's SEMAP for FY 2009-2010.

Indicator A: Selection from Waiting List

Goal: 24 CFR 985.3(a).3.i.B: "Based on the PHA's quality control samples, drawn separately for applicants reaching the top of the waiting list for admissions documentation shows that least 98 percent of the families in both samples of applicants and admissions were selected from the wait list for admission in accordance with these policies and met the selection criteria that determined their places on the waiting list and their order of selection."

Maximum 15 Points Available

Program Deficiency	Objective	Key Tasks/Action Items	Revised Target Date	Completion Date and Comments
A. Ensure Correct Universe and Quality Control Sample.	Implement effective sampling and quality control methods and procedures.	a. Update written SEMAP QC procedures to include specific procedures that will assist the PHA staff to identify the correct QC sample universe and sample size for the two quality control samples as required at 24 CFR 985.2(b) (families reaching the top and new admissions). b. Written procedures must identify how sample size was selected. Deliverable: Provide to HUD a written copy of updated QC procedures for the Wait List Indicator (24.CFR 985.2(b).	12-30-2011	12-28-11

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Indicator B: Reasonable Rent

Goal: 24 CFR 985.3(b).3.i.B: "based on the PHA's quality control samples of tenant files, the PHA follows its written method to determine reasonable rent and has documented its determination that the rent to owner is reasonable in accordance with 982.507 for at least 98 percent of units sampled at the time of initial leasing, if there is any increase in the rent to owner and at the HAP contract anniversary if there is a 5 percent decrease in the published FMR in effect 60 days before the HAP contract anniversary."

Maximum 20 Available Points

Program Deficiency	Objective	Key Tasks/Action Items	Revised Target Date	Completion Date and Comments
A. Incorrect Rent Reasonableness Quality Control Universe and sample size	Determine correct universe for quality control reviews and sample size	a. Update quality control procedures to ensure a complete universe of all families assisted at anytime during the Fiscal Year (i.e. "active" and "EOP" [including Port-out] families) and correct sampling method is used. Deliverable: Submit updated Quality Control and Sampling Procedures.	12-30-2011	12-28-11
B. Incorrect Rent Reasonableness determinations + documentation	Improve quality of rent reasonableness determinations + documentation	a. Evaluate current rent comparability procedures, policies, forms and systems and modify as needed. Deliverable: Checklist of required documentation.	01-29-2012	1-30-12

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Indicator C: Determination of Adjusted Income

Goal: 24 CFR 985.3(c).3.i.A: "based on the PHA's quality control samples of tenant files, for at least 90 percent of families: (A) the PHA obtains third party verification of reported family annual income, the value of assets totaling more than \$5,000, expenses related to deductions from annual income, and uses the verified information in determining adjusted income, and/or documents tenant files to show why third party verification was not available."

Maximum 20 Points Available

Program Deficiency	Objective	Key Tasks/Action Items	Revised Target Date	Completion Date and Comments
A. Incorrect Adjusted Income determination universe	Determine correct universe for quality control sample	a. Update quality control procedures to specify how to compile a complete universe including all families assisted at any time during the FY (i.e. "active" and "EOP" and port out families). Deliverable: Submit updated quality control and sampling procedures.	12-30-2011	12-28-11
B. Files missing required documentation.	Ensure utility allowance form and other required documentation is completed correctly and included in each participant file	a. Update and implement procedures for ensuring that files are documented for all adjusted income factors, including utility allowance determinations. b. Train staff to re-review and document the number of bedrooms and utility allowance at each annual recertification. c. Complete refresher training for staff on internal file protocol. Deliverables: 1. Submit updated procedures; 2. Submit sign-in sheets and agenda showing training on utility allowance documentation and internal file protocol	2-28-2012	

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Indicator D: Utility Allowance Schedule

Goal: 24 CFR 985.3(d).3.i: "The PHA's SEMAP certification states that the PHA reviewed utility rate data within the last 12 months, and adjusted its utility allowance schedule if there has been a change of 10 percent or more in a utility rate since the last time the utility allowance schedule was revised."

Maximum 5 Points Available

Program Deficiency	Objective	Key Tasks/Action Items	Revised Target Date	Completion Date and Comments
A. Incomplete documentation of Utility Allowance analysis	Demonstrate analysis of Utility Allowance changes	a. Obtain a final report and/or executive summary from the contractor or staff performing the utility analysis stating whether or not there was a change in rates and whether the change was 10% or more than the previous survey, with the previous survey rates and current survey rates. b. Maintain a copy of the most recent Utility Allowance Study with supporting data for each utility type in the PHA's utility district. Deliverables: 1. Report/summary from contractor or staff performing the utility analysis clearly stating whether there was a change of 10% or more and the current survey rates; 2. Maintain complete supporting documentation of utility analysis review for next SEMAP confirmatory.	3-31-2011 Provide when the next U.A. study is complete and when the next U.A. schedule is updated.	

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Indicator E: Housing Quality Standards (HQS) Quality Control Inspections

Goal: 24 CFR 985.3(e).3.i.: "The PHA's SEMAP certification states that an PHA supervisor or other qualified person performed quality control HQS reinspections during the PHA fiscal year for a sample of units under contract which meets the minimum sample size requirements specified in 983.2 under PHA's quality control sample. The PHA's SEMAP certification also states that the reinspected sample was drawn from recently completed HQS inspections (i.e., performed during the 3 months preceding the quality control reinspection) and was drawn to represent a cross section of neighborhoods and the work of a cross section of inspectors."

Maximum 5 Points Available

(No Deficiencies or Required Actions)

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Indicator F: HQS Enforcement

Goal: 24 CFR 985.3(f).3.i.: "The PHA's SEMAP certification states that the PHA's quality control sample of case files with failed HQS inspection shows that, for all cases sampled, any cited life-threatening HQS deficiencies were corrected within 24 hours from the inspection and, for at least 98 percent of cases sampled, all other cited HQS deficiencies were corrected within no more than 30 calendar days or any PHA-approved extension, the PHA stopped (abated) housing assistance payments beginning no later than the first of the month following the correction period, or took prompt and vigorous action to enforce family obligations."

Maximum 10 Points Available

Program Deficiency	Objective	Key Tasks/Action Items	Revised Target Date	Completion Date and Comments
A. Lack of quality control of HQS Enforcement.	Ensure HQS enforcement in compliance with HUD regulations.	a. Re-train staff and inspectors on the HQS Enforcement procedures, including correction timeframes and scheduling.	a. 2-28-2012	1-30-12
		b. Create and maintain an HQS Enforcement Log that includes at minimum, name of tenant, property address, whether deficiency is 24 hour or 30 day; date landlord notified; date corrected; and date abated. Please refer to the HCV Guidebook, Chapter 10.6 for guidance.	b. 1-29-2012	1-30-12
		c. Draft and implement a policy for reinspections and 24 hour fails during holidays.	c. 1-29-2012	1-30-12
		d. Implement monthly quality control reviews to identify incorrect repair timeframes and reinspection scheduling. Reduce frequency to quarterly reviews once sufficient progress is shown.	d. 1-29-2012	1-30-12
		Deliverables: (1) Submit sign-in sheet and agenda showing staff was trained on new HQS enforcement procedures. (2) Submit a copy of the HQS Enforcement Log. (3) Update Admin Plan with a holiday reinspection policy. (4) Submit summary/evidence of first monthly quality control review.		

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Indicator G: Expanding Housing Opportunities

Goal: 24 CFR 985.3(g).3.i.D-F: "The PHA's information packet for rental voucher holders contains either a list of owners who are willing to lease (or properties available for lease) under the rental voucher program; or a current list of other organizations that will help families find units and the PHA can demonstrate that the list(s) includes properties or organizations that operate outside areas of poverty or minority concentration; The PHA's information packet includes an explanation of how portability works and includes a list of portability contact persons for neighboring housing agencies, with name, address and telephone number of each, for use by families who move under portability; and PHA documentation shows that the PHA has analyzed whether rental voucher holders have experienced difficulties in finding housing outside areas of poverty or minority concentration and, if such difficulties have been found. PHA documentation shows that the PHA has analyzed whether it is appropriate to seek approval of exception payment standard amounts in any part of its jurisdiction and has sought HUD approval of exception payment standard amounts when necessary."

Maximum 5 Points Available

Program Deficiency	Objective	Key Tasks/Action Items	Revised Target Date	Comments Completion Date and
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(No Deficiencies/Required Actions.)

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Indicator H: Deconcentration Bonus

Goal: 24 CFR 985.3(h).3.i: "The data submitted by the PHA for the deconcentration bonus shows that the PHA met the requirements for bonus points."
Maximum 5 Points Available

Program Deficiency	Objective	Key Tasks/Action Items	Revised Target Date	Completion Date and Comments
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(No Points claimed in 2009/2010)

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Indicator I: Payment Standards

Goal: 24 CFR 985.3(i).3.i.: "PHA has adopted a payment standard schedule that establishes voucher payment standard amounts by unit size for each FMR area in the PHA jurisdiction; The PHA's voucher program payment standard schedule contains payment standards which do not exceed 110 percent of the current applicable published FMR and which are not less than 90 percent of the current applicable published FMR (unless a higher or lower payment standard amount is approved by HUD."

5 Points Available

Program Deficiency	Objective	Key Tasks/Action Items	Revised Target Date	Completion Date and Comments
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(No Deficiencies or Required Actions.)

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Indicator J: Annual Reexaminations

Goal: 24 CFR 985.3(j).3.i: "Whether the PHA completes a reexamination for each participating family at least every 12 months; Fewer than 5 percent of the reexaminations are more than 2 months overdue."

Maximum 10 Points Available

Program Deficiency	Objective	Key Tasks/Action Items	Revised Target Date	Completion Date and Comments
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(No Deficiencies or Required Actions.)

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Indicator K: Correct Tenant Rent Calculation

Goal: 24 CFR 985.3(k).3.i: "Whether the PHA correctly calculates tenant rent in the rental certificate program and the family's share of the rent to owner in the rental voucher program; 2 percent or fewer of PHA tenant rent and family's share of the rent to owner calculations are incorrect."

Maximum 5 Points Available

Program Deficiency	Objective	Key Tasks/Action Items	Revised Target Date	Completion Date and Comments
Incomplete file documentation of tenant rent calculations	Ensure proper file documentation	a. Re-train staff on file documentation procedures to ensure all documentation (EIV, income documentation, bank statements, utility allowance and executed HAP with contract rent) is included in the files. Deliverable: Attendance sheets and agenda for file documentation training.	2-28-2012	
Insufficient Quality Control.	To improve performance through ongoing quality control reviews.	a. Update and implement procedures for conducting quarterly quality control reviews of tenant files for correct tenant rent calculations that includes a checklist showing all third party verifications have been obtained, all documentation is included and all calculations are correct. Deliverable: Submit summary/evidence of the updated procedures and checklist to HUD field office for review.	1-29-2012	1-30-12

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Indicator L: Pre-contract Housing Quality Standards (HQS) Inspections

Goal: 24 CFR 985.3(l).3.i: "Whether newly leased units pass HQS inspection on or before the beginning date of the assisted lease and HAP contract (24 CFR 982.305); Fewer than 5 percent of annual HQS inspections of units under contract are more than 2 months overdue."

Maximum 10 Points Available

Program Deficiency	Objective	Key Tasks/Action Items	Revised Target Date	Completion Date and Comments
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(No Deficiencies or Required Actions.)

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Indicator M: Annual HQS Inspections

Goal: 24 CFR 985.3(m).3.i: "Whether the PHA inspects each unit under contract at least annually (24 CFR 982.405(a)); Fewer than 5 percent of annual HQS inspections of units under contract are more than 2 months overdue."

Maximum 10 Points Available

Program Deficiency	Objective	Key Tasks/Action Items	Revised Target Date	Completion Date and Comments
A. Late Annual Inspections reported in PIC.	Improve on-time inspection rate.	a. Identify overdue inspections in PIC and take appropriate action to resolve them. b. Adopt strict internal requirements for timely and accurate 50058 data entry and MTCS/PIC submission. c. Review PIC/MTCS report for this indicator on a monthly basis, address late annual inspections and maintain a record of progress. Deliverables: (1) Submit an action plan for resolving late annual inspections; (2) Submit procedures for timely PIC submissions; (3) Submit a summary/evidence of monthly PIC review and progress made.	12-30-2011	12-28-11

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Indicator N: Lease-up

Goal: 24 CFR 985.3(n).3.i.: "Whether the PHA enters HAP contracts for the number of units reserved under ACC for at least one year. The percent of units leased during the last PHA fiscal year was 98 percent or more, or the percent of allocated budget authority expended during the last PHA fiscal year was 98 percent or more."

Maximum 20 Points Available

Program Deficiency	Objective	Key Tasks/Action Items	Revised Target Date	Completion Date and Comments
Incorrect VMS reporting of participants who move and execute leases after the first of the month.	Correct VMS reporting	Ensure accurate VMS reporting of participants who move and execute HAPs after the first of the month. Deliverable: Written confirmation that errors have been corrected to HUD's Quality Assurance Division with a copy to the local Field Office Director.	11-30-2011	11-9-11

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Indicator O: Family Self-Sufficiency

Goal: 24 CFR 985.3(o).3.i.: "The PHA has filled 60 to 79 percent of its mandatory FSS slots and 30 percent or more of FSS families have escrow account balances."

Maximum 10 Points Available

(No Required Actions in 2009/2010 confirmatory)