



Carlos Alvarez, Mayor

fl005901

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April 30, 2008

Mr. Donald J. LaVoy
HUD Oversight Administrator
Miami-Dade Housing Agency
1401 NW 7th Street
Miami, FL 33125-3601

RE: Agency Plan Comments

Dear Mr. LaVoy:

I would like to take this time to share the County's comments on the PHA Plan ("Plan") for Miami-Dade Housing Agency ("MDHA"). They are as follows:

- On page 1 of the Plan, MDHA indicates that it will apply for additional Section 8 Housing Choice Vouchers. Currently, the Agency is under-leased and could see a loss of administrative fees. Adding new units without a plan may place the Agency in a more precarious situation. What is the plan to address this issue?
- On page 2 of the Plan, it reads 'MDHA regulations', perhaps it should state *policies*, as opposed to regulations.
- On page 15 of the Plan, "Statement of Financial Resources", it shows a \$7.5 million deficit in low rent. Please provide the basis of this statement. It appears that the resources listed are fiscal year 2007-08, not fiscal year 2008-09. According to the County's Office of Strategic Business Management (OSBM), they do not have back-up to substantiate the deficit and need further clarification on all resources listed. However, it should be noted that we observed the following changes to the Capital line items:
 - Operations line item reduced by \$30,000
 - Management Improvement line item reduced by \$1.220 million
 - Dwelling Structures line item has been increased by \$2.03 million.

Although we noticed an increase in expenditures on dwelling structures, it is unclear whether or not the Agency is addressing the Voluntary Compliance Agreement (VCA), which requires that five percent of the public housing units meet the Uniform Federal Accessibility Standards (UFAS). Changes in capital expenses show a reduction in resources that could be used for operations and administrative costs. The trade-off is increasing the capital investment in the dwelling units as well as the sites. This is a policy question since the deficit has to be covered and the County is facing a tremendous shortfall County-wide and can not absorb this deficit. With the deficit along with the reduced capital and potential reductions in subsidy, how is the agency factoring in the high level positions at the central office cost center?

- On page 18 of the Plan, where it addresses Admissions Preference, it suggests that the agency will allow transferees, due to under- and over-housed, to have preference over new admissions. It may not be the best management or community relations policy. Perhaps there could be some ratio, such as four new move-in's to one transfer that needs right sizing or something similar.

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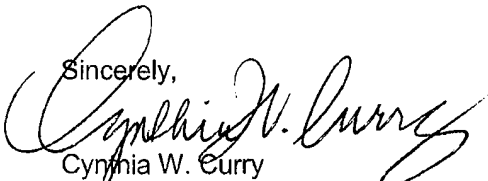
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- On page 28 of the Plan, listed are housing programs at the Agency including Section 8 New Construction. These programs have been moved to Miami-Dade County's Office of Community and Economic Development (OCED) and should not be included in the Plan.
- The Plan does not list Victory Homes as a potential demolition/disposition site. It was the County's understanding that this site was considered for GOB funding and development.
- The Table of Organization seems to show the budgeted number of employees for FY 2007-08, which is not the same number that has been proposed for FY 2008-09. This needs to be clarified.
- Attachment **f1005g01** Community Service and Self-Sufficiency has Mark Brown listed as a contact. However, Mr. Brown has not been with the MDHA for at least three years.
- Attachment **f1005j01** Section 8 Homeownership Capacity the first paragraph states that S8 Homeownership is being administered jointly by Private Rental Housing; doesn't say who other partners, i.e. OCED using the Surtax program.
- It is not clear that the Plan will be submitted to the Miami-Dade Board of County Commissioners ("Board") for their review. Although the U.S. Department of Housing and Urban Development ("HUD") may be in temporary possession of MDHA, we strongly believe that some of the policy changes that are being recommended will impact the constituents of the County Commission. Therefore, prior to submitting the Plan to HUD, we recommend that the Plan should be presented to the Board for their consideration and approval.

This represents the collective comments of the County and we request that they be seriously considered and incorporated into the Plan. Also, I request that you continue to keep the County's Executive Office and the County Attorney's Office apprised of any additional changes to the Plan.

Thank you for your consideration in these matters.

Sincerely,



Cynthia W. Curry
Senior Advisor to the County Manager

- c: Honorable Carlos Alvarez, Mayor
George M. Burgess, County Manager
Denis Morales, Mayor's Chief of Staff
Robert A. Cuevas, Jr., County Attorney
Jose Cintron, Director, Office of Community and Economic Development
Terrence A. Smith, Assistant County Attorney