

OFFICE OF INSPECTOR GENERAL CITY OF JACKSONVILLE



REPORT OF MANAGEMENT REVIEW

JACKSONVILLE HOUSING AUTHORITY UTILITY ASSISTANCE PROGRAM

MATTHEW J. LASCELL
INSPECTOR GENERAL

DECEMBER 19, 2023

DATE ISSUED

“Enhancing Public Trust in Government Through Independent and Responsible Oversight”



OFFICE OF INSPECTOR GENERAL CITY OF JACKSONVILLE

CASE NUMBER: 2024-0006MR

Matthew J. Lascell
Inspector General

“Enhancing Public Trust in Government Through Independent and Responsible Oversight”

EXECUTIVE SUMMARY

In an effort to detect and deter wasteful expenditure of government funds, the Office of Inspector General (OIG) initiated a Management Review of the Jacksonville Housing (JH) Utility Assistance program. Per the United States Department of Housing and Urban Development (HUD), the program is also known as Utility Reimbursement Payments (URP). Funding for the program comes from HUD.

According to JH, a family is eligible for URP if its Tenant Total Payment (TTP) is less than the utility allowance for the unit occupied. Family TTPs (and, thus, potential URP) are calculated at each interim and annual reexam. As such, the total amount of URP paid to families housed fluctuates monthly.

The OIG obtained account data for the URP from JH and then contacted the card service provider, ONBE. ONBE is a program manager who issues payments and manages payment programs for corporate clients and government entities. ONBE issues payments through affiliated banks to facilitate a wide variety of payment programs. A representative supplied the total amount allocated for the URP and the percentage of those dollars spent by JH tenants on utilities between October 31, 2022, and October 31, 2023.

During that period, \$1,990,166.21 was loaded onto 1,634 JH tenant URP cards. ONBE data revealed that only 13.49% (\$268,473.42) of the funds were spent on utilities (Merchant Category Code 4900 - Electric, Gas, Sanitary, Telephone, or Water Utilities).

\$1,721,692.79 of those expenditures were unrelated to utilities. The issued debit card for payment of URP also gives the ability to use an ATM cash option.

The wasteful expenditure of governmental funds can be remedied with appropriate internal controls.

BACKGROUND

The issuance of debit cards for payment of URP was enacted by JH in 2012. According to JH, URP does not reimburse JH tenants for utility bill payments that they have paid. JH Operations Compliance Department Manager Todd Aubuchon advised the OIG, “Neither federal regulation nor agency policy requires a family to apply URP toward utilities; therefore, the money can be

spent at the family's discretion. However, the issued debit cards are intended to be used for utilities." JH defines utilities as water, electricity, gas, heating, refrigeration, cooking fuels, trash collection, and sewage charges.

ISSUES, GOVERNING DIRECTIVES, AND FINDINGS

Issues:

Whether public funds loaded onto JH Utility Assistance Cards were spent in the way they were intended.

Governing Directives:

U.S. Department of Housing and Urban Development (HUD) 24 CFR 5.632

JHA Administrative Plan Housing Assistance Division

JHA Housing Management Division Admission and Continued Occupancy Policy

Findings:

The OIG reviewed HUD 24 CFR § 5.632, the JHA Administrative Plan, the Housing Assistance Division Policy (JHA Admin Plan), and the JHA Housing Management Division Admissions and Continued Occupancy Policy (JHA ACOP).

- **US Housing & Urban Development Department (HUD)**

HUD 24 CFR § 5.632 - *Utility reimbursements:*

(2) In the public housing program (where the family is paying an income-based rent), the Section 8 moderate rehabilitation program, and the Section 8 certificate or voucher program, the Public Housing Authority (PHA) may pay the utility reimbursement either to the family or directly to the utility supplier to pay the utility bill on behalf of the family. If the PHA elects to pay the utility supplier, the PHA must notify the family of the amount paid to the utility supplier.

(3) In the other Section 8 programs, the owner must pay the utility reimbursement either:

- (i) To the family, or with the family's consent, to the utility supplier to pay the utility bill on behalf of the family.

- **JHA Admin Plan:**

SECTION XIV – UTILITY ALLOWANCE

1. *Utility Reimbursement*

Where the utility allowance exceeds the Total Tenant Payment of the family, the housing authority will provide a Utility Reimbursement Payment to the family each month. The JHA will initially issue utility reimbursement in the form of a check. After that, utility reimbursement will be given through a Visa prepaid check card.

- **JHA ACOP**

Utilities: Utilities means water, electricity, gas, heating, refrigeration, cooking fuels, trash collection, and sewage charges.

Utility Allowance: In those instances where the cost of utilities (except telephone) for an assisted unit is not included in the Resident's Rent but is the responsibility of the family occupying the unit, an amount equal to the monthly cost of a reasonable consumption of such utilities for the unit. High-rise residences have JHA-paid utilities, and multi-family communities have tenant-paid utilities. The utility allowance varies from one community to another and by the bedroom size of the specific unit in that community.

Utility Reimbursement: The amount, if any, by which the utility allowance for the unit, if applicable, exceeds the Total Tenant Payment for the family occupying the unit.

- JH can pay the utility supplier directly on behalf of the tenants. Julie Moore, Jacksonville Electrical Authority (JEA), confirmed that JEA accepts third-party payments.
- ONBE personnel advised they could restrict JH URP cards to ensure public funds are only spent for specific Merchant Category Codes. However, any update to the JH URP would require JH to update its contract with ONBE.

RECOMMENDED CORRECTIVE ACTIONS

To prevent the wasteful expenditure of governmental funds related to the JH URP cards,

1. Pay the utility reimbursement directly to the utility supplier on behalf of the family or
2. Direct ONBE to restrict URP cards for the Merchant Category Code related to utilities.

MANAGEMENT'S RESPONSE

The OIG provided JH an opportunity to submit a written explanation or rebuttal to the findings as stated in this investigative report within ten (10) calendar days. Their response is attached to this report.

INSPECTOR GENERAL STANDARDS

This report/review has been conducted in accordance with ASSOCIATION OF INSPECTOR GENERAL Principles and Quality Standards for Investigations.



Memorandum

Date: **December 18, 2023**

To: **Matthew J. Lascell, Inspector General**

From: **Dwayne Alexander, President & CEO**

Re: **Case Number 2024-0006MR**

Thank you for the opportunity to respond to Case Number 2024-0006MR and clarify the remittance of the utility reimbursements for the families participating in the Housing Choice Voucher and Public Housing programs.

Executive Summary

The OIG's suggested changes are neither best practice nor mandatory for the Department of Housing and Urban Development (HUD). To this point, 100% of all funding that was obligated to each family as required by the federal government was issued. 100% of the funds went to families that qualify for utility reimbursement payments. There is no misuse of funds or waste of HUD funds.

The utility reimbursement payment (URP) benefits a resident in the Housing Choice Voucher Program and Public Housing Program. HUD does not have any requirements or mandates regarding how families use reimbursement payments. In addition, the utility allowance schedule allows for payments to be made for the expense of appliances. This is in contrast to what was mentioned in the report. Many of the more progressive Housing Authorities throughout the country use recommended best practices from HUD to issue utility reimbursement payments via debit card, including the New York Housing Authority, the largest Housing Authority of the 3400 Public Housing Authorities in the USA.

In contrast, a significant number of PHAs are still distributing checks. The PHA cannot track how the family spends the money because the resident has the option to spend it at their own discretion when receiving checks. It is the responsibility of JHA to ensure that families receive the correct utility allowance. JHA's internal process has been in line with the industry standard according to HUD since 2012. JHA is responsible for certifying clients by completing each financial calculation to determine the correct reimbursement amount in accordance with HUD regulations and the Annual Contributions Contract.



JHA maintains the importance of defining the terminology used in this response from the outset. The following terminology is relevant to this matter.

Utility reimbursement:

A public housing authority's action of repaying a family a portion of the funds remitted funds for utilities as defined in the Public Housing Authority's Administrative Plan and Admissions and Continued Occupancy Plan. In this case, the family has spent money on the costs of maintaining utilities as required to participate in the Housing Voucher Program and Public Housing programs.

Please refer to Exhibit 1, the Utility Allowance Schedule.

The HCV Program Guidebook 6-3 outlines utility allowance.

A utility allowance is calculated for an assisted family if the family is responsible for paying the cost of any utilities (except telephone).

A **utility allowance** is "an amount equal to the estimate made or approved by a PHA or HUD of the monthly cost of a reasonable consumption of [tenant-paid] utilities...by an energy-conservative household". 24 CFR §5.603(b).

Use of utility allowance schedule:

The PHA must use the appropriate utility allowance for the lesser of the size of the dwelling unit leased by the family or the family unit size as determined under the PHA subsidy standards. In cases where the unit size leased exceeds the family unit size as determined under the PHA subsidy standards as a result of reasonable accommodation, the PHA must use the appropriate utility allowance for the size of the dwelling unit actually leased by the family. A family's utility allowance is determined by the size of the unit the family actually leases, not by the size of the family's voucher.

24 CFR §982.517(d).

The utility reimbursement payments are governed by a contractual relationship between JHA and to; HUD to benefit the residents. Specifically, JHA is bound by the Annual Contributions Contract (ACC) with the Department of Housing and Urban Development (HUD). Annual Contributions Contract states:

An annual contributions contract (ACC) is a written contract between HUD and a PHA. Under the ACC, HUD agrees to make payments to the PHA, over a specified term, for housing assistance payments to the owner and the PHA administrative fee. The ACC specifies the maximum payment over the ACC term. The PHA agrees to administer the program in accordance with HUD regulations and requirements.



Currently, there is no language in the Code of Federal Regulations, PIH Notices, HCV, or PH Guidebooks or within the ACC that would have a PHA to restrict the use of the utility reimbursement payments.

24 CFR §982.151 (a)(1).

HUD provides guidance on acceptable reimbursement methods in the federal regulations. In the Federal Register Vol. 81 No. 45, HUD addressed the issue of whether it supported “options other than checks for making utility reimbursement payments”, HUD stated:

HUD supports the use of alternative utility reimbursement methods, including debit cards. PHAs that choose to use such alternative methods should ensure that such reimbursement methods do not generate fees that must be paid by the tenant.

Streamlining Administrative Regulations for Public Housing, Housing Choice Voucher, Multifamily Housing and Community Planning and Development Programs, 81:45 Fed. Reg. 12360 (March 8, 2016) (to be codified at 24 CFR pts. 960.253 & 982.514).

Further, 24 CFR §982.514 (b), *Distribution of housing assistance payment*, states:

If the housing assistance payment exceeds the rent to owner, the PHA may pay the balance of the housing assistance payment (“utility reimbursement”) either to the family or directly to the utility supplier to pay the utility bill on behalf of the of the family. If the PHA elects to pay the utility supplier directly, the PHA must notify the family of the amount paid to the utility supplier.

While 24 CFR §960.253(c)(3) adds:

The income-based tenant rent must not exceed the total tenant payment (§5.628 of this title) for the family minus any applicable utility allowance for tenant-paid utilities. If the utility allowance exceeds the total tenant payment, the PHA shall pay such excess amount (the utility reimbursement) either to the family or directly to the utility supplier to pay the utility bill on behalf of the family.

Finally, the Jacksonville HUD Field Office maintains that for the HCV Program,

A PHA has the option of making utility allowance reimbursements directly to the utility supplier or to the family. HUD does not prescribe a method for utility reimbursement payments, and it is not uncommon for agencies to place utility reimbursements on debit cards, per PHA policy.

Please see Exhibit 2, Jacksonville HUD Field Office Letter of December 12, 2023.



Please be informed that JHA has not violated the ACC or any HUD regulations as it pertains to administering and remitting utility reimbursement payments. However, the statement that is included in the report does not reflect the full scope of the program. It is the intention of JHA to expound upon the issue surrounding how utility reimbursement can be spent by those entitled to receive these funds. HUD regulations as it pertains to the administration of the utility reimbursement payments intent and purpose is to ensure families receive the correct amount of money, the focus is not about how the money is spent by those families that have been determined eligible to receive such funds.

Moreover, in the past, JHA made an effort to give URPs directly to utility providers, but it was unsuccessful. JHA reached out to JEA several years ago, the most common utility company utilized by our program participants, seeking to utilize the direct payment option instead of debit cards. The administrative burden on both JHA and utility companies to administer a direct payment process was a cause of concern. As the name indicates, URPs are meant to reimburse utility payments for those individuals who receive these payments. For JHA and the relevant utility providers to obtain, track, and remit payments monthly for participants would be a large endeavor. Not only would JHA have to employ numerous employees for the processing of URPs alone, but the sheer number of participants involved demonstrates the herculean task it would take for JHA to utilize this option in our geographic service area with five (5) different utilities. Additionally, the OIG's conclusions from the requested data received from JHA are not accurate portrayals of URPs usage by JHA participants. Instead, the URP payments received from JHA do not come close, in most cases, to cover the actual amount of utility expenses incurred by JHA participants, nor did the participants, despite not utilizing the URP debit card, not pay their respective utility bills while participating in JHA programs.

Utilizing direct payment rather than debit cards is contrary to JHA's mission and JHA's Strategic Plan, which guides JHA's operations, as approved by its Board of Commissioners. One of the seven principles in JHA's Strategic Plan is to 'do business more efficiently and effectively'. JHA has elected not to remit payments directly to Jacksonville Electric Authority (JEA) because JEA is not the only utility vendor that services the families participating in the HCV and Public Housing program. In addition, the HCV Program's participants live in four distinct counties in the region: Clay, Duval, Nassau, and St. Johns.

County/Municipality	Electric & Water Provider	Natural Gas
Clay County	Clay County Utility Authority Clay Electric Cooperative	TECO
St. Johns County	Florida Power & Light, JEA, and Beaches Energy	TECO
Nassau County	Florida Power & Light, Florida Public Utilities	TECO
Jacksonville Beach	Beaches Energy Services	TECO

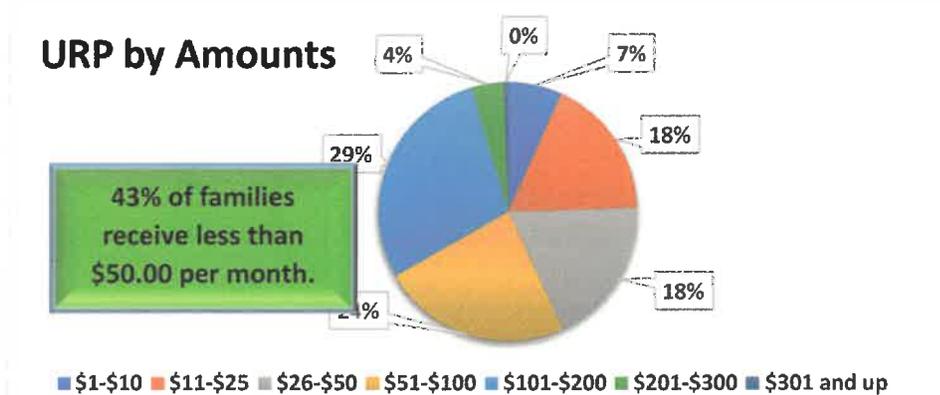
Participants may choose which service provider they would like to have their utility reimbursement paid to, and that could be the natural gas company. Ongoing monthly monitoring of account numbers (as they can change) and payment amounts among over 1633 participants and five (5) utility providers is not an efficient and effective business practice. Participants could even elect to switch back and forth between the electric and gas providers monthly if they chose, and JHA would have to accommodate the requests. It would be an administrative burden for the agency as we strive to ensure families receive the assistance needed to pay their utility bills.

OIG must be aware that some of these payments do not entirely cover the participant's utilities. The payments are based on a utility formula that calculates reimbursements according to the size of the bedroom and income. The report found that 43% of the 1634 households received reimbursement for only one dollar (\$1) to fifty dollars (\$50) per month. See Exhibit 1. This is a crucial point.

OIG should know that seven percent (7%) of the participating households receive only minimal reimbursement payments, i.e., between one (\$1) and ten (\$10) dollars per month for utility bills. According to Energy Sage, Jacksonville, Florida residents spend an average of about \$232 per month on electricity, which adds up to \$2,784.00; the average URP does not cover the average monthly JEA bill.¹ A \$10 utility reimbursement payment would not dent the participant's utility bill. It would be more difficult for the participant to use, as it would require them to use multiple forms of payment to pay their monthly utility bill.

Regarding the OIG's report, the Inspector General's Office requested information on all families that received utility reimbursement payments from 2020 to 2023. There were a total of 1634 families that were identified and provided.

Figure 1.1 URP by Amounts



¹ www.energysage.com/local-data/electricity-cost



Therefore, 43% of the families that JHA provides utility reimbursements do not receive enough funding to cover the average cost of heating and cooling their homes. When receiving utility reimbursement for JHA, it is simply a reimbursement of funds that were already expended to cover ongoing utility costs. It's crucial to note that JEA increased the basic monthly charge for residential customers from \$5.50 per month to \$15.00 per month starting February 28, 2023. Approximately 11% of the families identified in the report provided to the Inspector General's office do not receive a utility reimbursement that would cover the new basic monthly charge. Not only for JEA, but for all the potential utility providers in the geographic areas served by JHA, in many cases the URP would fail to cover even the basic monthly utility charge for the participant.

The basic rate charges for utility providers in the area are listed below:

Utility Provider	Basic Rate Charge
JEA	\$15.00
Clay County Utility Authority	\$35.05
Clay County Electric Cooperative	\$32.00
Florida Power & Light	\$9.48
Beaches Energy Services (Electric)	\$4.50
Beaches Energy Services (Natural Gas)	\$12.00
TECO	\$15.10-\$24.60

As indicated in the OIG report, OIG found that only 13% of families exclusively paid for their utilities with the URP debit card. This would give the impression that 87% of the families did not pay for their utilities. However, this is not in line with the fact it is a JHA policy violation to have disconnected utilities and HUD regulations. Additionally, there are participating families who receive contributions/donations from charitable organizations and family members to assist with their ongoing utility expenses. These donations can result in utility credits resulting in a negative balance. In these cases, families would not have a monthly utility bill to pay. Further, the utility allowance has usage calculations for appliances, the recommendation to restrict the debit cards to utilities only is a violation of the HUD regulation and the ACC by which we are governed.

The HCV Guidebook, Chapter 10, pg. 30 states that “tenants are responsible for to correct HQS fail and inconclusive items resulting from: *Failure to pay for tenant-supplied utilities.*” Further, it is a violation of 24 CFR §982.551(c), wherein it is stated that an obligation of a participant. “**HQS breach caused by family.** The family is responsible for an HQS breach caused by the family described in §982.404(b)” See 24 CFR §982.551(c). 24 CFR §982.404(b)(1)(i) also states:

The family is responsible for a breach of the HQS that is caused by any of the following...The family fails to pay for utilities that the owner is not required to pay for, but which are to be paid by the tenant.



1300 Broad Street N
Jacksonville, FL 32202

Phone: 904-630-3810

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24 CFR §982.404(b)(1)(i). The reality is that only 4 of close to 11,000 families found to have JHA program violations for the time frame considered by the OIG were for no power.

Please know that JHA takes prompt action if a family participates in the HCV Program, or the Public Housing Program fails to have utilities in service. A family is viewed as violating the Family Obligations for the HCV Program or violating the lease agreement in the Public Housing Program, with families participating in the HCV Program issued a 72-hour Notice to have utilities reconnected before further adverse action is taken. JHA has had to take such action only with a small percentage of families participating in the programs we administer. Less than 1% of all terminations are related to the disconnection of utilities.

Lastly, it is vital to reiterate that the Jacksonville Housing Authority has not violated any federal regulation or internal policy related to the remittance of utility reimbursement payments to participants in the HCV Program or residents in the Public Housing program; therefore, JHA does not view the proper distribution of utility reimbursement payments to eligible families as a waste of federal funds.



1300 Broad Street N
Jacksonville, FL 32202

Phone: 904-630-3810

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Exhibit 1

Utility Allowances

Section 8
Utility Allowance Effective 10/01/23 thru 09/30/24

Detached

Bedrooms	SRO	OBR	1BR	2BR	3BR	4BR	5BR	6BR	7BR
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UA Pro for Section 8 - Blended Rates Effective October 1, 2022		MONTHLY DOLLAR ALLOWANCE (Detached) - <u>detached</u>							
Bedroom Size		OBR	1BR	2BR	3BR	4BR	5BR	6BR	7BR
Heating									
a.	Oil	60	71	76	82	87	93	98	104
b.	Natural Gas	25	32	32	34	40	42	45	43
c.	Bottle Gas	84	99	107	114	122	130	138	145
d.	Electric	20	24	26	29	31	34	36	39
Cooking									
a.	Natural Gas	5	6	9	11	13	17	20	22
b.	Bottle Gas	16	19	27	35	44	52	60	69
c.	Electric	7	8	11	15	19	22	26	29
Other Electric									
Other Electric -Household		37	44	61	79	96	113	131	148
Air-conditioning		15	18	40	63	85	108	130	153
Water Heating									
a.	Natural Gas	12	16	21	30	34	44	47	53
b.	Bottle Gas	41	49	70	92	113	135	156	178
c.	Electric	19	22	28	34	40	46	52	58
Misc Utilities									
Water		26	27	38	55	84	117	132	155
Sewer		41	44	64	96	112	122	149	169
Trash Collection		18	18	18	18	18	18	18	18
Tenant Provided Appliances									
Range		21	21	21	21	21	21	21	21
Refrigerator		25	25	25	25	25	25	25	25
Misc Natural Gas Charge									
Other (Natural Gas Monthly Fee)		20	20	20	20	20	20	20	20

Actual Family Allowances- Complete below for the actual unit rented.	Utilities Service	Per month cost
Name of Family	Heating	\$
	Cooking	
	Other Electric	
	Air Conditioning	
Address of Unit	Water Heating	
	Water	
	Sewer	
	Trash Collection	
Number of Bedrooms	Range	
	Refrigerator	
	Other	
	Total	\$

**Section 8
Utility Allowance Effective 10/01/23 thru 09/30/24**

Duplexes, Row House, Townhouse

Bedrooms	SRO	OBR	1BR	2BR	3BR	4BR	5BR	6BR
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UA Pro for Section 8 - Blended Rates Effective October 1, 2022		MONTHLY DOLLAR ALLOWANCE (Duplexes, Row House, Townhouse) - <u>attached</u>						
Bedroom Size		OBR	1BR	2BR	3BR	4BR	5BR	6BR
Heating								
a.	Oil	60	70	75	79	84	88	93
b.	Natural Gas	25	32	31	38	40	42	44
c.	Bottle Gas	84	98	105	111	117	124	130
d.	Electric	16	19	22	25	27	30	33
Cooking								
a.	Natural Gas	5	6	9	11	13	17	20
b.	Bottle Gas	16	19	27	35	44	52	60
c.	Electric	7	8	11	15	19	22	26
Other Electric								
	Other Electric -Household	32	38	53	68	82	97	112
	Air-conditioning	20	23	39	56	72	88	105
Water Heating								
a.	Natural Gas	12	16	21	30	34	44	47
b.	Bottle Gas	41	49	70	92	113	135	156
c.	Electric	19	22	28	34	40	46	52
Misc Utilities								
	Water	26	27	38	55	84	117	132
	Sewer	41	44	64	96	112	122	149
	Trash Collection	18	18	18	18	18	18	18
Tenant Provided Appliances								
	Range	21	21	21	21	21	21	21
	Refrigerator	25	25	25	25	25	25	25
Misc Natural Gas Charge								
	Other (Natural Gas Monthly Fee)	20	20	20	20	20	20	20

Actual Family Allowances- Complete below for the actual unit rented.	Utilities Service	Per month cost
		Heating
Name of Family	Cooking	
	Other Electric	
	Air Conditioning	
Address of Unit	Water Heating	
	Water	
	Sewer	
	Trash Collection	
	Range	
Number of Bedrooms	Refrigerator	
	Other	
	Total	\$

**Section 8
Utility Allowance Effective 10/01/23 thru 09/30/24**

Manufactured Homes

Bedrooms	SRO	OBR	1BR	2BR	3BR	4BR	5BR	6BR
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UA Pro for Section 8 - Blended Rates Effective October 1, 2022		MONTHLY DOLLAR ALLOWANCE (Manufactured Homes) - <u>manufac</u>						
Bedroom Size		OBR	1BR	2BR	3BR	4BR	5BR	6BR
Heating								
a.	Oil	51	60	65	69	74	79	84
b.	Natural Gas	21	25	27	32	31	33	39
c.	Bottle Gas	71	84	91	97	104	110	117
d.	Electric	11	13	15	17	19	21	23
Cooking								
a.	Natural Gas	5	6	9	11	13	17	20
b.	Bottle Gas	16	19	27	35	44	52	60
c.	Electric	7	8	11	15	19	22	26
Other Electric								
Other Electric -Household		37	44	61	79	96	113	131
Air-conditioning		19	22	38	53	69	84	100
Water Heating								
a.	Natural Gas	12	16	21	30	34	44	47
b.	Bottle Gas	41	49	70	92	113	135	156
c.	Electric	19	22	28	34	40	46	52
Misc Utilities								
Water		26	27	38	55	84	117	132
Sewer		41	44	64	96	112	122	149
Trash Collection		18	18	18	18	18	18	18
Tenant Provided Appliances								
Range		21	21	21	21	21	21	21
Refrigerator		25	25	25	25	25	25	25
Misc Natural Gas Charge								
Other (Natural Gas Monthly Fee)		20	20	20	20	20	20	20

Actual Family Allowances- Complete below for the actual unit rented.	Utilities Service	Per month cost
	Name of Family	Heating
Cooking		
Other Electric		
Air Conditioning		
Address of Unit	Water Heating	
	Water	
	Sewer	
	Trash Collection	
	Range	
Number of Bedrooms	Refrigerator	
	Other	
	Total	\$

**Section 8
Utility Allowance Effective 10/01/23 thru 09/30/24**

Multi-Family 2-4 Units

Bedrooms	SRO	OBR	1BR	2BR	3BR	4BR	5BR	6BR
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UA Pro for Section 8 - Blended Rates Effective October 1, 2022		MONTHLY DOLLAR ALLOWANCE (Multi-Family 2-4 Units) - <u>multi2-4</u>						
Bedroom Size		OBR	1BR	2BR	3BR	4BR	5BR	6BR
Heating								
a.	Oil	52	62	65	68	71	74	77
b.	Natural Gas	22	26	27	31	32	31	32
c.	Bottle Gas	73	86	91	95	99	103	107
d.	Electric	12	14	16	18	20	22	24

Cooking								
a.	Natural Gas	5	6	9	11	13	17	20
b.	Bottle Gas	16	19	27	35	44	52	60
c.	Electric	7	8	11	15	19	22	26
Other Electric								
Other Electric -Household		31	37	51	65	79	94	108
Air-conditioning		22	26	36	46	57	67	77
Water Heating								
a.	Natural Gas	12	16	21	3	34	44	47
b.	Bottle Gas	41	49	70	92	113	135	156
c.	Electric	19	22	28	34	40	46	52
Misc Utilities								
Water		26	27	38	55	84	117	132
Sewer		41	44	64	96	112	122	149
Trash Collection		18	18	18	18	18	18	18
Tenant Provided Appliances								
Range		21	21	21	21	21	21	21
Refrigerator		25	25	25	25	25	25	25
Misc Natural Gas Charge								
Other (Natural Gas Monthly Fee)		20	20	20	20	20	20	20

Actual Family Allowances- Complete below for the actual unit rented.	Utilities Service	Per month cost
Name of Family	Heating	\$
	Cooking	
	Other Electric	
	Air Conditioning	
Address of Unit	Water Heating	
	Water	
	Sewer	
	Trash Collection	
	Range	
Number of Bedrooms	Refrigerator	
	Other	
	Total	\$

Section 8
Utility Allowance Effective 10/01/23 thru 09/30/24

Multi-Family 5+ Units

Bedrooms	SRO	OBR	1BR	2BR	3BR	4BR	5BR	6BR
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UA Pro for Section 8 - Blended Rates Effective October 1, 2022		MONTHLY DOLLAR ALLOWANCE (Multi-Family 5+ Units) - <u>multifam</u>						
Bedroom Size		OBR	1BR	2BR	3BR	4BR	5BR	6BR
Heating								
a.	Oil	42	49	53	57	61	65	69
b.	Natural Gas	19	21	22	24	28	30	32
c.	Bottle Gas	59	69	75	80	85	91	96
d.	Electric	9	11	13	14	16	17	19
Cooking								
a.	Natural Gas	5	6	9	11	13	17	20
b.	Bottle Gas	16	19	27	35	44	52	60
c.	Electric	7	8	11	15	19	22	26
Other Electric								
Other Electric -Household		25	30	42	53	65	77	89
Air-conditioning		20	23	32	41	50	59	68
Water Heating								
a.	Natural Gas	11	12	17	22	30	32	41
b.	Bottle Gas	33	39	56	73	92	108	125
c.	Electric	15	18	23	27	32	37	42
Misc Utilities								
Water		26	27	38	55	84	117	132
Sewer		41	44	64	96	112	122	149
Trash Collection		18	18	18	18	18	18	18
Tenant Provided Appliances								
Range		21	21	21	21	21	21	21
Refrigerator		25	25	25	25	25	25	25
Misc Natural Gas Charge								
Other (Natural Gas Monthly Fee)		20	20	20	20	20	20	20

Actual Family Allowances- Complete below for the actual unit rented.	Utilities Service	Per month cost
Name of Family	Heating	\$
	Cooking	
	Other Electric	
	Air Conditioning	
Address of Unit	Water Heating	
	Water	
	Sewer	
	Trash Collection	
	Range	
Number of Bedrooms	Refrigerator	
	Other	
	Total	\$



1300 Broad Street N
Jacksonville, FL 32202

Phone: 904-630-3810

JaxHA.org   

Exhibit 2

US Department of Housing and Urban Development Letter



U. S. Department of Housing and Urban Development
Jacksonville Field Office
Charles Bennett Federal Building
400 West Bay Street
Suite 1015
Jacksonville, Florida 32202-4439

December 12, 2023

VIA ELECTRONIC MAIL

Christopher Walker
Board Chairperson
Jacksonville Housing Authority
1300 Broad Street N
Jacksonville, FL 32202
cwalker@JAXHA.org

Dear Chairperson Walker:

The purpose of this letter is to share resources and information about utility reimbursements under the Housing Choice Voucher (HCV) program, per HUD's HCV regulations at [24 CFR Part 982](#).

Under the HCV program, Public Housing Authorities (PHAs) adopt payment standards based on gross rent, which is the sum of rent to owner plus any utility allowance. 24 CFR 982.4. PHAs are required to maintain a utility allowance schedule for all tenant-paid utilities, for cost of tenant-supplied refrigerators and ranges, and for other tenant-paid housing services (e.g., trash collection). 24 CFR 982.517(a). The utility allowance schedule must be determined based on the typical cost of utilities and services paid by energy conservative households that occupy housing of similar size and type in the same locality. In developing the schedule, the PHA must use normal patterns of consumption for the community as a whole and current utility rates. PHAs must review their utility allowance schedules each year and revise their allowance for a utility category if there has been a change of 10 percent or more in the utility rate since the last time the utility allowance schedule was revised. 24 CFR §982.517(c).

If the subsidy that the family qualifies for exceeds the rent to owner, the family is entitled to receive a utility reimbursement. HUD provides flexibility for PHAs to choose the method of reimbursement. Specifically, PHAs may pay the utility reimbursement directly to the family or directly to the utility supplier. If the PHA elects to pay the utility supplier directly, the PHA must notify the family of the amount paid to the utility supplier. 24 CFR §982.514(b).

HUD supports the use of checks or other alternative payment methods for making utility reimbursement payments to families. This includes the use of debit cards. PHAs that choose to use such alternative methods should ensure that such reimbursement methods do not generate fees that must be paid by the tenant. [81 Federal Register 12354, 12360 \(March 8, 2016\)](#)

In addition to the above-cited regulations, HUD's HCV Guidebook includes some helpful information about utility allowance in its [Utility Allowances \(May 2020\)](#) chapter.

Although the purpose of this letter was to share HUD's HCV policy guidance, please know that HUD has adopted similar policy guidance for Public Housing Residents and this may be found at [24 CFR Part 960](#). See 24 CFR §960.353(c)(3).

I hope this information is helpful. If I may be of further assistance, please let me know.

Sincerely,

12/12/2023

X *Janice Rodriguez*

Janice Rodriguez
Director, Office of Public Housing
Signed by: JANICE RODRIQUEZ

cc: Dwayne Alexander, Executive Director, dalexander@HAXHA.org