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# Streamlined Annual PHA Plan (Small PHAs)

U.S. Department of Housing and Urban Development Office of Public and Indian Housing

OMB No. 2577-0226 Expires: 03/31/2024

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

**Applicability.** The Form HUD-50075-SM is to be completed annually by **Small PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, HCV-Only PHA, or Qualified PHA do not need to submit this form.

#### Definitions.

- (1) High-Performer PHA A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) Small PHA A PHA that is not designated as PHAS or SEMAP troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) Housing Choice Voucher (HCV) Only PHA A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) Standard PHA A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) Troubled PHA A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) Qualified PHA A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

<b>A.</b>	PHA Information.	State of the state				
A.1	PHA Type: Small PHA Plan for Fiscal Year PHA Inventory (Based on Number of Public Housin; Total Combined: 1079 PHA Plan Submission Typ  Availability of Informatio public. A PHA must identi public hearing and proposed public may reasonably obta streamlined submissions. A office or central office of th encouraged to provide each	Beginning: (MN Annual Contribution (PH) Units: 20 Pe: Annual Section 1. In addition to fy the specific load PHA Plan are a in additional infect a minimum, PI e PHA. PHAs a resident council	tions Contract (ACC) units at time  Number of H  Submission Revised A  the items listed in this form, PHAs cation(s) where the proposed PHA available for inspection by the public ormation of the PHA policies contained As must post PHA Plans, including the strongly encouraged to post com	of FY beginning, above)  Iousing Choice Vouchers (HC)  Annual Submission  must have the elements listed be Plan, PHA Plan Elements, and ac. Additionally, the PHA must ined in the standard Annual Plang updates, at each Asset Managplete PHA Plans on their official	pelow readily ava all information re provide informat n but excluded fro gement Project (A	ilable to the levant to the ion on how the om their MP) and main
				Program(s) not in the	No. of Units in Each Program	
	Participating PHAs	PHA Code	Program(s) in the Consortia	Consortia	PH	HCV
	Lead PHA:		5			
		2 , 8				

Plan Elements Submitted with 5-Year PHA Plans. Required elements for Small PHAs completing this document in years in which the 5-Year Plan is also due. This section does not need to be completed for years when a Small PHA is not submitting its 5-Year Plan. See sub-section below for required elements in all other years (Years 1-4).		
Revision of Existing PHA Plan Elements.		
(a) Have the following PHA Plan elements been revised by the PHA since its last <u>Five-Year PHA Plan</u> submission?		
Y N  □ Statement of Housing Needs and Strategy for Addressing Housing Needs. □ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. □ Financial Resources. □ Rent Determination. □ Homeownership Programs. □ Substantial Deviation. □ Significant Amendment/Modification  (b) If the PHA answered yes for any element, describe the revisions for each element(s):  (c) The PHA must submit its Deconcentration Policy for Field Office Review.  See Attachment NC081a01		
New Activities.		
(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?		
Y N		
(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.		
See Attachment NC081b01		
Progress Report.		
Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.		
See Attachment NC081c01		

B.4	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. 2024-2028 Action Plan submitted 6/18/24 & under review.		
B.5	.5 Most Recent Fiscal Year Audit.		
	(a) Were there any findings in the most recent FY Audit?		
	Y N □ ⊠		
	(b) If yes, please describe:		
	Plan Elements Submitted All Other Years (Years 1-4). Required elements for all other fiscal years. This section does not need to be completed in years when a Small PHA is submitting its 5-Year PHA Plan.		
B.1	New Activities		
	(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?		
	Y N ☐ ☐ Hope VI or Choice Neighborhoods.		
	☐ ☐ Mixed Finance Modernization or Development. ☐ ☐ Demolition and/or Disposition.		
	Conversion of Public Housing to Tenant-Based Assistance.  Conversion of Public Housing to Project-Based Assistance under RAD.		
	☐ Project Based Vouchers. ☐ Units with Approved Vacancies for Modernization.		
	☐ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).		
	(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process.		
	(c) If using Project-Based Vouchers, provide the projected number of project-based units, general locations, and describe how project-basing would be consistent with the PHA Plan.		
	(d) The PHA must submit its Deconcentration Policy for Field Office Review.		
	NA		
B.2	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.		
	NA .		
C	Other Document or Certification Requirements for Annual Plan Submissions. Required in all submission years.		
C.1	Resident Advisory Board (RAB) Comments.		
	(a) Did the RAB(s) have comments to the PHA Plan?		
	Y N		
	(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.		

C.2	Certification by State or Local Officials.					
8	Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan. See Attachment NC081d01					
C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.					
	Form HUD-50077-CRT-SM, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed, must be submitted by the PHA as an electronic attachment to the PHA Plan.  See Attachment NC081d01 & NC081e01					
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.					
	<ul> <li>(a) Did the public challenge any elements of the Plan?</li> <li>Y N</li> <li>□</li> </ul>					
	If yes, include Challenged Elements.					
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Affirmatively Furthering Fair Housing (AFFH).				
	Affirmatively Furthering Fair Housing.  Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Hou (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item:  "Until the rulemaking process is complete, PHAs only needs to submit a civil rights certification with the Annu PHA Plan to remain compliant."			
	Fair Housing Goal:			
	Describe fair housing strategies and actions to achieve the goal			
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	Describe fair housing strategies and actions to achieve the goal			

		Describe fair housing strategies and actions to achieve the goal
nst	ru	ections for Preparation of Form HUD-50075-SM Annual Plan for Small PHAs
. P	HA	Information. All PHAs must complete this section. (24 CFR §903.4)
A		Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units a or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevate to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))
		PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))
. Р	lan	Elements. PHAs must complete this section during years where the 5-Year Plan is also due. (24 CFR §903.12)
В	.1	Revision of Existing PHA Plan Elements. PHAs must:
		Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" but If an element has not been revised, mark "no."
		Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and othe generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provide by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR § 903.7(a)).
		The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))
		Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions. Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing high income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty are income mixing requirements. 24 CFR §903.7(b) Describe the PHA's procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. 24 CFR §903.7(b) A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b) Describe the unit assignment policies for public housing. 24 CFR §903.7(b)
		Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program and state the planned use for the resources. (24 CFR §903.7(c)
		Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicab public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d)

	Homeownership Programs. A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. (24 CFR §903.7(k) and 24 CFR §903.12(b).
	☐ Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i)
	☐ Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.
	If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.
	PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))
B.2	New Activities. If the PHA intends to undertake any new activities related to these elements or discretionary policies in the current Fiscal Year, mark "yes' for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."
	HOPE VI or Choice Neighborhoods. 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate
	process. See guidance on HUD's website at: <a href="https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6">https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6</a> . (Notice PIH 2011-47)
	Mixed Finance Modernization or Development. 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: <a href="https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4">https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4</a>
	Demolition and/or Disposition. Describe any public housing projects owned by the PHA and subject to ACCs (including name, project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed. The application and approval process for demolition and/or disposition is a separate process. Seguidance on HUD's website at: <a href="http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm">http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm</a> . (24 CFR §903.7(h))
	Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:
	http://www.hud.gov/offices/pih/centers/sac/conversion.cfm. (24 CFR §903.7(j))
	Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.
	□ Project-Based Vouchers. Describe any plans to use HCVs for new project-based vouchers. (24 CFR §983.57(b)(1)) If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan (24 CFR §903.7(b)).
	Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with 24 CFR §990.145(a)(1).
	Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).
B.3	<b>Progress Report.</b> For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))
B.4	Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR §903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."
B.5	Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))
Ann	<b>Tual Plan Elements Submitted All Other Years (Years 1-4).</b> PHAs must complete this section during years where the 5-Year Plan is also due. (24 CFR §903.12)
В.	1 New Activities. If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."
	☐ Hope VI or Choice Neighborhoods. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for

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		Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:
		https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. (Notice PIH 2010-30)
,		Mixed Finance Modernization or Development. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at:
		http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm. (Notice PIH 2010-30)
		Demolition and/or Disposition. With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected unit along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 1 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: <a href="http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm">http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm</a> . (24 CFR §903.7(h))
		Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:
		http://www.hud.gov/offices/pih/centers/sac/conversion.cfm. (24 CFR §903.7(j))
		Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.
	,	Project-Based Vouchers. Describe any plans to use HCVs for new project-based vouchers. (24 CFR §983.57(b)(1)) If using project-based vouchers, provide the projected number of project-based units and general locations and describe how project-basing would be consistent with the PHA Plan.
		Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with 24 CFR §990.145(a)(1).
		Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).
	B.2	Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR §903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."
C.	Oth	er Document and/or Certification Requirements.
	C.1	Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)
	C.2	Certification by State of Local Officials. Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.
		Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 CRT-SM, PHA Certifications of Compliance with PHA Plan. Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed. Form HUD-50077 CRT-SM, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to
	C.4	Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

#### D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) .... Strategies and actions must affirmatively further fair housing ...." Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 7.02 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

#### Attachment nc081a01

#### Revision to PHA Plan Elements Since the Last Five-Year Plan FY 2020-24:

- (a) Have the following PHA Plan elements been revised by the PHA since its last <u>Five-Year PHA Plan</u> submission? See form HUD-50075-SM
- (b) If the PHA answered yes for any element, describe the revisions for each element.

#### FY 2020-2024 Revisions to Plan Elements:

AMENDMENT TO THE ACOP & HCV ADMINISTRATIVE PLAN: Applicants who reside or work in AHA's jurisdiction will receive priority.

AMENDMENT TO THE HCV ADMINISTRATIVE PLAN: Denial of Registered Sex Offenders: Have a household member who is subject to a lifetime registration requirement under a State sex offender registration program. Household members who are not subject to the lifetime registration requirement, but who are currently listed as active on the sex offender registry will also be denied until they have completed their required registration period.

AMENDMENT TO PUBLIC HOUSING ACOP: & HOUSING CHOICE VOUCHER (HCV) ADMINISTRATIVE PLAN: ABLE (Achieving a Better Life Experience) Accounts in HUD-Assisted Programs.

AMENDMENT TO THE HCV ADMINISTRATIVE PLAN: Housing Conversion Action (Enhanced and Regular Housing Choice Vouchers)

EXTENSION OF RENT EVICTION NOTICE DUE TO COVID-19: Admissions & Continued Occupancy Policy

REDUCTION IN HCV MINIMUM RENT: In the past few months HUD has increased its focus on PHAs to fully utilize available Housing Choice Voucher (HCV) funds to house families. HUD wants PHAs to use all available funding, including reserves, to support as many families as possible. HUD's goal is to reach 98% of annual HAP budget authority by September 30, 2022, and to fully utilize available HCV funds. AHA has been contacted by HUD's Greensboro Office to discuss voucher lease up and funding utilization which has been significantly impacted by the COVID-19 pandemic and the eviction moratorium initiated and extended by the federal government. Based on these discussion HUD has recommended AHA amend the HCV Administrative Plan and reduce the current \$50.00 minimum rent to \$0.00 to help utilize available HCV funding.

<u>Change in Family Definition:</u> **Family** includes but is not limited to, <u>the following, regardless of actual perceived sexual orientation, gender identity, or marital status:</u>

- 1. A single person, who may be an elderly person, displaced person, disabled person, nearelderly person, or any other single person; or
- 2. A group of persons residing together, and such group includes, but is not limited to:

- a. A family with or without children (the temporary absence of a child from the home due to placement in foster care shall not be considered in determining family composition and family size);
- b. An elderly family;
- c. A near-elderly family;
- d. A disabled family;
- e. A displaced family;
- f. The remaining member of a resident family; and
- g. A single person who is not an elderly or displaced person, or a person with disabilities, or the remaining member of a resident family.
- h. A single person who is a youth. Who is at least 18 years old and not more than 21 years old who left foster care at age 16 or older and who lack adequate housing."

HOTMA EARNED INCOME DISREGARD AMENDMENT: Public Housing ACOP & HCV Administrative Plan: HOTMA Earned Income Disregard Amendment: In September 2023 HUD published PIH Notice 2023-27 - Implementation Guidance: Sections 102 and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA), and the Public Housing ACOP and HCV Administrative Plan were revised to incorporate the mandatory changes for Earned Income Disregard (EID).

(c) The PHA must submit its Deconcentration Policy for Field Office Review.

#### **HCV Administrative Plan:**

#### 5.3 SELECTION FROM THE WAITING LIST

Based on the preferences, all families in preference A will be offered housing before any families unless preference B is in effect. The date and time of application will be utilized to determine the sequence of choosing an applicant within the above preferences-

Notwithstanding the above, if necessary to meet the statutory requirement that 75% of newly admitted families in any fiscal year be families who are extremely low-income (unless a different target is agreed to by HUD), the AHA retains the right to skip higher income families on the waiting to reach extremely low-income families. This measure will only be taken if it appears the goal will not otherwise be met. To ensure this goal is met, the Housing Authority will monitor incomes of newly admitted families and the income of the families on the waiting list.

If there are not enough extremely low-income families on the waiting list, we will conduct outreach on a non-discriminatory basis to attract extremely low-income families to reach the statutory requirement.

#### **ACOP**

#### 10.3 SELECTION FROM THE WAITING LIST

The AHA shall follow the statutory requirement that at least 40% of newly admitted families in any fiscal year be families whose annual income is at or below 30% of the area median income. To ensure this requirement is met we shall quarterly monitor the incomes of newly admitted families and the incomes of the families on the waiting list. If it appears that the requirement to house extremely low-income families will not be met, we will skip higher income families on the waiting list to reach extremely low-income families.

If admissions of extremely low-income families to the AHA's voucher program during a fiscal year exceed the 75% minimum targeting requirement for the AHA's voucher program, such excess shall be credited (subject to the limitations in this paragraph) against the AHA's public housing targeting requirement for the same fiscal year.

The fiscal year credit for voucher program admissions that exceeds the minimum voucher program targeting requirement shall not exceed the lower of:

- A. Ten (10) % of public housing waiting list admissions during the AHA fiscal year;
- B. Ten (10) % of waiting list admissions to the AHA's Section 8 tenant-based assistance program during the PHA fiscal year; or
- C. The number of qualifying low-income families who commence occupancy during the fiscal year of AHA public housing units located in census tracts with a poverty rate of thirty (30) % or more. For this purpose, qualifying low-income family means a low-income family other than an extremely low-income family.

If there are not enough extremely low-income families on the waiting list, we will conduct outreach on a non-discriminatory basis to attract extremely low-income families to reach the statutory requirement.

(c) If the PHA answered yes for any element, describe the revisions for each element below:

#### Attachment nc081b01: New Activities in Current Fiscal Year 2025

### Mixed Finance Modernization or Development:

AHA continues to look for opportunities mixed finance modernization projects and new development opportunities, for example:

- In 2022-23 AHA worked with a developer to issue multifamily housing revenue bonds for the renovation of a 101-unit multifamily residential rental facility for seniors in Asheboro. NCHFA announced Housing Tax-Exempt Bonds for the project totaling \$10,790,000 and in addition to project would be eligible to claim \$696,100 in annual low-income housing tax credits.
- In 2022 AHA issued a Request for Qualifications (RFQ) for a Co-Developer and two proposals were received. Throughout 2022-23 AHA established a Memorandum of Understanding (MOU) with the Co-Developer to selected developer to build new housing on AHA property of other agreed upon property. The project was put on hold due to an unsuccessful LIHTC application.

### Conversion of Public Housing to Project-Based Assistance under RAD:

AHA continues to follow the repositioning policies for public housing units conversion to RAD or one of the many HUD offered options. Over the past several years AHA staff and Board have participated in the many activities, and it is anticipated this will continue into the current Fiscal Year:

- Repositioning training and conferences
- Calculation of rents and submission to HUD Repositioning staff.
- Meeting and communicating with HUD Repositioning staff on multiple occasions

In general, RAD/repositioning appears not to be financially beneficial to AHA; however, HUD continues to modify the requirements and creating new opportunities and options that could make conversion more attractive. AHA will continue to consider options and opportunities that are in our best interests and our residents and properties.

#### **Units with Approved Vacancies for Modernization:**

At this time, AHA has no units with approved vacancies due to modernization; however, as the Physical Needs Assessment (PNA) proceeds there may be a need to request approved vacancies depending on the level of unit improvements needed.

#### **Other Capital Grant Projects**

Renovation of the Tenant Services Building: In order to accommodate the AHA's
Resident Opportunity Self-Sufficiency (ROSS) and HCV FSS programs, access to the Tenant
Services Building was expanded and plans for renovation were initiated. Since mid-2022 AHA's
self-sufficient programs have been actively offering workshops and classes partnering with

- several community organizations. In addition to painting and interior repairs work began planning for improvements/remodeling plans to the kitchen and building in general. The project was bid in December 2023 and the contract was awarded in January 2024 and construction began in January 2024. The project was completed in August 2024.
- Housing-related Hazard Capital Fund Program: On 9/15/21 AHA was awarded a \$439,765 grant for improvements to public housing units. The purpose of the grant is to 1) install new exhaust fans in all public housing units that remove water and humidity reducing elements that contribute to mold growth and 2) to provide new combination CO/smoke detector in every sleeping area and every room/area containing a gas burning appliance. The project was bid, awarded and construction began May 2023 and improvements to all 200 public housing units were completed in November 2023.

### Attachment NC081c01: Progress Meeting Mission & Goals 2020-2024

Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low income, and extremely low-income families for the next five years.

# Goal 1. Expand the supply of affordable housing. Objectives:

- Evaluate program options for new affordable housing funding including applying for Housing Choice Vouchers when they become available, Rental Assistance Demonstration (RAD), repositioning, tax credits and grants.
  - AHA has reviewed RAD's potential development/repositioning options. In addition, AHA has taken part in training sessions to evaluate program costs, financing and the opportunities associated with RAD & repositioning.
  - o In May 2022 AHA issued a RFQ inviting developers to submit proposals to serve as the Co-Developer to redevelop/develop vacant property for the development of low-income housing tax credit. Developers responded to the RFQ and AHA entered negotiations with a development company. Unfortunately, no agreement was reached, and the project ended.
  - In August 2023 AHA entered an Intergovernmental Agreement with Burlington Housing Authority's (BHA's) for the administration of Project Based Vouchers (PBV) as part of BHA's transition to RAD which included: 1) AHA agreed to administer 71 PBV housing units, 2) AHA will also process Housing Assistance Payments and utility payments and AHA will perform other management duties related to RAD.
- Achieve an annual public housing vacancy rate of 2 percent or below.
  - o AHA's annual occupancy rate was 93.2% in FY 2020, 96.4% in FY 2021, 96.6% in FY 2022, 96.5% in FY 2023 and 98.4% for FY 2024.
- Utilize not less than 98 percent of Section 8 HAP budget authority or maintain a lease-up rate greater than 98 percent annually, through 2024.
  - o AHA utilized HAP Budget authority totaling 107% in 2020, 113% in 2021, 100% in 2022, 112% in 2023 and 103% 2024.

## Goal 2. Improve the quality of assisted housing. Objectives:

- Continue to maintain a high standard of public housing management, demonstrated by reaching a High Performer rating through 2024.
  - OPHAS scoring: 2020 no score COVID waiver, 2021 no score COVID waiver, 2022 score 93 High Performer and no score in 2023 or 2024 due to transition to NSPIRE system.
- Maintain a high standard of Section 8 Voucher management, demonstrated by reaching a High Performer rating through 2024.
  - SEMAP scoring: 2020 score 86 Standard Performer, 2021 no score COVID waiver, 2022 no score COVID waiver, 2023 score 95 High Performer and 93 High Performer 2024.
- AHA will lose no Section 8 landlords due to dissatisfaction with discretionary policies or management of the program that can be controlled by AHA: *Ongoing*
- Continue to evaluate the physical condition of housing units and renovate or modernize public housing units and avoid demolition or disposition. *Ongoing*
- Obligate all Capital Funds within 24 months of receipt. Ongoing

## Goal 3. Provide an improved living environment. Objectives:

• Continue to maintain 50 units designated for elderly families through 2024.

• The eight elderly designated renewal submitted in 8/8/19 and approved 9/30/2019 through 12/7/2021. The ninth elderly designated renewal submitted in 8/7/23 and approved 10/21/23 through 12/8/2025.

### Goal 4. Promote self-sufficiency. Objectives:

- Provide offices, classroom facilities, and administrative services for training public housing and community clients in partnership with Randolph Community College.
  - Renovation of the Tenant Services Building as part of the 2022 three-year ROSS-SC grant additional community partners have been established.
- AHA will continue as a volunteer agency to deliver meals-on-wheels to needy residents.

o Support for meals-on-wheels continues.

- Provide training opportunity and work experience for public housing and Section 8 families through NC Work First, NC Works Careen Center, Workforce Investment Act (WIA), Randolph Community College, Goodwill and Regional Consolidated Services related programs.
  - As part of the 2022 three-year ROSS-SC grant and the recently awarded 2024 HCV FSS grant additional community partners have been established to support & promote selfsufficiency activities for both public housing and HCV residents.

# Goal 5. Ensure equal opportunity and affirmatively further fair housing. Objectives:

- Prominently post and make available fair housing literature. Ongoing
- Comply with all fair housing laws. Ongoing
- Reply to all requests for reasonable accommodation within five days. Ongoing
- Maintain five public housing units that are fully compliant with Section 504 of the rehabilitation
   Act of 1973 and Title II of the Americans with Disabilities Act. Ongoing