

<b>Streamlined Annual PHA Plan (Small PHAs)</b>	<b>U.S. Department of Housing and Urban Development Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226 Expires: 02/29/2016</b>
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**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, 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.** 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 of 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, or at risk of being designated as troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 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 exceeds 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.

A.	PHA Information.																										
A.1	<p>PHA Name: _____ PHA Code: _____            PHA Type: <input type="checkbox"/> Small <input type="checkbox"/> High Performer            PHA Plan for Fiscal Year Beginning: (MM/YYYY): _____            PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)            Number of Public Housing (PH) Units _____ Number of Housing Choice Vouchers (HCVs) _____            Total Combined _____            PHA Plan Submission Type: <input type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																	
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Lead PHA:																											

<b>B.</b>	<b>Annual Plan Elements Submitted with 5-Year PHA Plans.</b> Required elements for all 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 PHA is not submitting its 5-Year Plan. See Section C for required elements in all other years (Years 1-4).
<b>B.1</b>	<p><b>Revision of PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last <b>Five-Year PHA Plan</b> submission?</p> <p>Y N</p> <p><input type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>(b) The PHA must submit its Deconcentration Policy for Field Office Review.</p> <p>(c) If the PHA answered yes for any element, describe the revisions for each element below:</p>
<b>B.2</b>	<p><b>New Activities</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p><input type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(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.</p>
<b>B.3</b>	<p><b>Progress Report.</b></p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p>

<b>C.</b>	<b>Annual Plan Elements Submitted All Other Years (Years 1-4).</b> Required elements for all other fiscal years. This section does not need to be completed in years when a PHA is submitting its 5-Year PHA Plan.
<b>C.1.</b>	<p><b>New Activities</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N</p> <p><input type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.  <input type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.  <input type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.  <input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.  <input type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.  <input type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(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.</p> <p>(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.</p> <p>(d) The PHA must submit its Deconcentration Policy for Field Office Review.</p>
<b>C.2</b>	<p><b>Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan</b></p> <p>Form 50077-SM, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, including Item 5 must be submitted by the PHA as an electronic attachment to the PHA Plan. Item 5 requires certification on whether 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.</p>
<b>D</b>	<b>Other Document or Certification Requirements for Annual Plan Submissions.</b> Required in all submission years.
<b>D.1</b>	<p><b>Civil Rights Certification.</b></p> <p>Form 50077-SM-HP, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<b>D.2</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N  <input type="checkbox"/> <input type="checkbox"/></p> <p>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.</p>
<b>D.3</b>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<b>E</b>	<b>Statement of Capital Improvements.</b> Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).
<b>E.1</b>	<b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.

# Instructions for Preparation of Form HUD-50075-SM Annual Plan for Small and High Performing PHAs

## A. PHA Information. All PHAs must complete this section.

**A.1** Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Inventory**, **Number of Public Housing Units and or Housing Choice Vouchers (HCVs)**, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant 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\(a\)](#))

## B. Annual Plan. PHAs must complete this section during years where the 5-Year Plan is also due. (24 CFR §903.12)

### B.1 Revision of 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” box. 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. 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 and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA’s public housing and Section 8 tenant-based assistance waiting lists. [24 CFR §903.7\(a\)\(1\)](#) and 24 CFR §903.12(b). Provide a description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA’s public housing and Section 8 tenant-based assistance waiting lists. [24 CFR §903.7\(a\)\(2\)\(ii\)](#) and 24 CFR §903.12(b).

**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 higher 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 and 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 or 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 applicable 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. Should the PHA fail to define ‘significant amendment/modification’, HUD will consider the following to be ‘significant amendments or modifications’: a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency public housing CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan); or c) any change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD’s website at: [Notice PIH 1999-51](#). ([24 CFR §903.7\(r\)\(2\)\(ii\)](#))

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: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

**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: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

**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. See guidance on HUD's website at: [http://www.hud.gov/offices/pih/centers/sac/demo\\_dispo/index.cfm](http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm). (24 CFR §903.7(h))

**Conversion of Public Housing.** 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))

**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.

**Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

**B.3 Progress Report.** 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))

**C. Annual Plan.** PHAs must complete this section during years where the 5-Year Plan is not due. (24 CFR §903.12)

**C.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 Hope VI or Choice Neighborhoods 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)

**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.** Describe any public housing projects owned by the PHA and subject to ACCs (including 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. See guidance on HUD's website at: [http://www.hud.gov/offices/pih/centers/sac/demo\\_dispo/index.cfm](http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm). (24 CFR §903.7(h))

**Conversion of Public Housing.** 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.** 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 assistance under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32](http://www.hud.gov/offices/pih/centers/sac/conversion.cfm)

**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).

**C.2 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 form HUD-50077 SM-HP.

**D. Annual Plan.** PHAs must complete this section in all years.

- D.1 Civil Rights Certification.** Form HUD-50077 SM-HP, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, 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 AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. ([24 CFR §903.7\(o\)](#))
- D.2 Resident Advisory Board (RAB) comments.** If the RAB provided comments to 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](#))
- D.3 Certification by State or 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](#))

**E. Statement of Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. ([24 CFR 903.7 \(g\)](#))

- E.1 Capital Improvements.** In order to comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan. PHAs can reference the form by including the following language in Section C. 8.0 of the PHA Plan Template: "See HUD Form 50075.2 approved by HUD on XX/XX/XXXX."

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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 16.64 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.

## Annual Plan Attachment

### **Section B.1 Annual Plan Element Changes**

**Admissions:** The AAHC no longer automatically disqualifies an applicant if a household member has been evicted from federally subsidized housing in the last 3 years or has been evicted from federally subsidized housing for drug violations in the last 5 years. The AAHC will consider other factors such as successfully completing a drug rehabilitation program in the last 3 years.

**Waitlist:** The AAHC clarified the process for removing an applicant from the waitlist so that it is consistent when an application is pulled from the waitlist and fails to respond as well as when an applicant is asked for an update and fails to respond. The applicant will have 15 business days to respond. If the notice is returned without a forwarding address, the tenant will be removed from the waitlist. If the notice is returned with a forwarding address, the notice will be sent to the new address and the applicant will have 15 business days to respond. An applicant's failure to respond prevents the AAHC from making an eligibility determination and therefore removal from the waitlist under this circumstance is not subject to a hearing.

**Voucher Service Area:** Western Wayne County was removed from the service area because that area is covered by many other housing authorities and only a few households are currently served in Western Wayne, who will be grandfathered into that service area.

**Rent Determination as impacted by the Utility Allowances for Project-Based Vouchers:** The AAHC will be requesting HUD approval to adjust the utility allowance for project-based voucher projects that have made energy efficiency improvements. The AAHC will also request that HUD approve site-specific utility allowances for properties that converted under the RAD program, based on the energy efficient improvements that were made to each property. If HUD approves this change, the AAHC will change the utility allowance by 75% of the savings and the tenants will receive 25% of the energy savings.

**Over Income Tenants:** Please see the attached letter for HUD regarding over-income tenants. The AAHC is considering adopting a policy regarding the requirement for over-income tenants to move and the AAHC is looking for public comments on what that policy should state.

**Project Based Voucher:** The advertisement for the Request for Proposal will be published at least 1 day per week for 2 consecutive weeks in a local on-line and/or print newspaper of general circulation.

**Operations and Management:** Congress has approved an increase in 100 Moving to Work Housing Authorities. The AAHC will explore the pros and cons of applying to be an MTW agency. HUD has not issued any guidelines yet on how to apply to become an MTW agency.

According to HUD's website: "Moving to Work (MTW) is a demonstration program for public housing authorities (PHAs) that provides them the opportunity to design and test innovative, locally-designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families. MTW gives PHAs exemptions from many existing public housing and voucher rules and more flexibility with how they use their Federal funds. MTW PHAs are expected to use the opportunities presented by MTW to inform HUD about ways to better address local community needs."

[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/public\\_indian\\_housing/programs/ph/mtw](http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/ph/mtw)

**Family Self Sufficiency:** HUD has increased funding from \$103,500 to \$138,000 which will enable the AAHC to have 2.0 FTE's instead of 1.5 FTE's for the Family Self Sufficiency Program.

**Financial Resources:**

<b>Planned Sources and Uses</b>		
<b>Federal Sources:</b>	<b>Planned (Est.)</b>	<b>Planned Uses</b>
Public Housing Operating Funds	\$171,000	PH Operations
Public Housing Capital Fund CFP501-14 Grant	\$476,920	RAD Conversion
Public Housing Capital Fund CFP501-15 Grant	\$152,244	RAD Conversion and Public Housing Renovations
Public Housing Capital Fund CFP501-16 Estimated Grant	\$81,193	Public Housing Renovations
Housing Choice Voucher/S8 HAP Grant	\$11,000,000	HCV and PBV HAP Expenses. Including RAD PBV and VASH
Housing Choice Voucher/S8 Admin Fees	\$1,200,000	S8/HCV Admin Expenses
Continuum of Care	\$4,700,000	Rent and Services
Family Self Sufficiency	\$138,000	Family Self Sufficiency program
Other (Interest Income, Fraud Recovery)	\$65,000	Restricted
<b>Non-federal sources (list below)</b>		
City of Ann Arbor General Fund	\$265,000	Operations and Services
Tenant Rental Income	\$1,400,000	Housing Operations
<b>Total resources</b>	<b>\$19,649,357</b>	

**Pets:** The AAHC will be constructing several new affordable housing projects that will have both RAD and regular project-based vouchers as rental subsidy. The AAHC will be adopting a no-pet policy for the new construction properties except for service animals which will be allowed. The AAHC's public housing pet policy will continue to allow pets except for exotic animals and dogs greater than 25 pounds. There are several reasons to adopt a pet-free policy at some properties including offering an allergy free location for people who are allergic to animals. In addition, pets cause a high amount of additional noise and wear and tear on existing properties. Due to the negative impact of changing the pet policy for existing tenants, the AAHC will not be changing the pet policy for existing properties.



**Section B.2 New Activities**

**Conversion of Public Housing under the Rental Assistance Demonstration Program:** The AAHC is continuing to convert 100% of its properties under the RAD program to project-based vouchers. There were no changes to the RAD program regulations. Below is the current plan for each property site:

RAD Project	Public Housing Property Name	Property Type	Current				Net Change (from Public Housing to RAD)
			Public Housing Units	Proposed Total Units	Proposed RAD Units	Proposed Non-RAD Units	
Phase 1	S. Seventh	Family	8	8	8	-	-
	Hillside	Family	6	6	6	-	-
	Mallet's Creek	Family	6	6	6	-	-
	Upper Platt	Family	5	5	5	-	-
	Evelyn Court	Family	1	-	-	1	(1)
Phase 2	S. Maple	Family	29	29	29		
	Miller	Family	103	106	91	15	(12)
Phase 3	N. Maple Estates	Family	19	42	27	15	8
	N. Maple Duplexes	Family	4	4	4	-	
Phase 4	Broadway	Family	20	20	0	20	(20)
	Lower Platt	Family	4	32	20	12	16
	White/State/Henry	Family	28	32	24	8	(4)
	Oakwood	Family	3	3	0	3	(3)
	W. Washington	Family	2	2	0	2	(2)
Scattered Sites			23	23	23	-	-
	Green Baxter	Family					
	Baker	Family	64	64	64	-	-
	Hikone	Family	29	29	29	-	-
<b>Total Units</b>			<b>354</b>	<b>411</b>	<b>336</b>	<b>76</b>	<b>(18)</b>

*The conversion of public housing units under RAD to Section 8 units, either under the project-based voucher (PBV) Section 8 program will shift the converted units into a different regulatory program. As a result, the RAD converted units will no longer be subject to public housing portions of our agency's annual plans. They will, however, become subject to the rules of the applicable Section 8 program, as modified by a few rules specific to RAD converted units. These specific RAD-related rules are intended to apply a few important provisions of the public housing rules to the RAD converted units, even though they would not normally be applicable in the Section 8 context.*

*The following five transactions have been approved for a RAD conversion by HUD, subject to compliance with the requirements of the RAD notice, including the resident consultation requirements.*

**Phase 1 – South Seventh, Hillside, Mallet’s Creek, Upper Platt, Evelyn – Family Developments**

Under the RAD conversion of the Phase I properties, 25 of the current public housing units have been converted to RAD Section 8 units. There will be no change in the bedroom distribution of units. The conversion resulted in one (1) de minimis unit at Evelyn Court which will continue to be available as affordable housing with a voucher. The current and post conversion unit information is:

Unit Type	Number of Bedrooms	Current PH Units	Proposed RAD Units	Proposed Non-RAD Units
Family	1 BR	9	9	0
Family	2 BR	2	2	0
Family	3 BR	14	13	1
Family	4 BR	1	1	0
Family	5 BR	0	0	0
Total		25	25	1

**Phase 2 – South Maple, Miller Properties – Family Developments**

Under the RAD conversion of the Phase 2-properties, three new units were created, 120 of the current public housing units were converted to RAD Section 8 units, and 15 units were converted to non-RAD project-based VASH units. The conversion resulted in a de minimis reduction of (12) units (when combined with River Run) but all 12 units continue as affordable housing with project-based VASH vouchers. The current and post conversion unit information is:

Unit Type	Number of Bedrooms	Current PH Units	Proposed RAD Units	Proposed Non-RAD Units
Family	1 BR	98	91	15
Family	2 BR	5	5	0
Family	2 BR	10	10	0
Family	3 BR	14	14	0
Family	4 BR	5	5	0
Total		132	120	15

**Phase 3 – North Maple Estates, North Maple Duplexes - Family Developments**

Under the RAD conversion of the Phase 3-properties, 19 current public housing units were demolished and 42 units will be newly constructed and 4 units will be rehabilitated. The new development will consist of 31 RAD Section 8 units and 15 non-RAD affordable units with

project-based vouchers. The conversion will result in 8 additional RAD units at this site from a transfer of assistance from 1508 Broadway. 1508 Broadway will continue to be affordable housing with voucher assistance. The current and post conversion unit information is:

Unit Type	Number of Bedrooms	Current PH Units	Proposed RAD Units	Proposed Non-RAD Units
Family	1 BR	0	8	0
Family	2 BR	0	2	2
Family	3 BR	4	4	8
Family	4 BR	10	10	2
Family	5 BR	9	7	3
<b>Total</b>		<b>23</b>	<b>31</b>	<b>15</b>

**Phase 4 – Broadway, White/State/Henry, Lower Platt, Oakwood, W. Washington - Family Developments**

Under the RAD conversion of the Phase 3-properties, 32 current public housing units will be demolished and replaced with 64 affordable housing units including 44 RAD units and 20 project-based voucher units. The properties at 1504 Broadway, 1506 Broadway and W. Washington will transfer their RAD assistance to the properties at White/State/Henry and Lower Platt but will continue to provide affordable housing with non-RAD vouchers. Oakwood will be converted to non-RAD affordable units through a de minimis reduction but will continue to operate as affordable housing with vouchers. W/S/H will reduce two 2-bdr units under de minimis. The current and post conversion unit information is:

Unit Type	Number of Bedrooms	Current PH Units	Proposed RAD Units	Proposed Non-RAD Units
Family	1 BR	28	28	17
Family	2 BR	14	12	9
Family	3 BR	0	0	6
Family	4 BR	0	0	2
Family	5 BR	7	4	3
<b>Total</b>		<b>58</b>	<b>44</b>	<b>37</b>

**Scattered Sites (East) – Green Baxter, Baker, Hikone Properties, Family Developments**

Under the RAD conversion of the Scattered Site (East) properties, there was no change in the number of units; there was no change in the bedroom distribution of units and there was no change in the type of units. The current and post conversion unit information is:

Unit Type	Number of Bedrooms	Current PH Units	Proposed RAD Units	Proposed Non-RAD Units
Family	1 BR	16	16	16
Family	2 BR	12	12	12
Family	3 BR	4	4	4
Family	4 BR	10	10	10
Family	5 BR	11	11	11
<b>Total</b>		<b>116</b>	<b>116</b>	<b>116</b>

**Turnkey III:** The AAHC has one house on Garden Circle that was previously in the Turnkey III program which no longer exists. The AAHC will be officially removing this house from PIC with HUD but will continue to operate it as affordable housing through the voucher program.

**Broadway:** The public housing subsidy at Broadway is being transferred under the RAD program to the new developments at North Maple, White/State/Henry and Lower Platt Road. All of the units at 1508 Broadway had the rental assistance transferred to North Maple and the tenants at 1508 were given the option under RAD relocation of moving to the North Maple Estates after it is constructed. The units at 1504 and 1506 Broadway will have the rental assistance transferred to White/State/Henry and Lower Platt Road and the tenants will be given the option of moving to one of those properties after they are constructed.

Originally the AAHC planned on selling or demolishing Broadway, however, the AAHC has decided to maintain Broadway as affordable housing by providing non-RAD project-based vouchers or allow tenant based vouchers at Broadway for residents who wish to continue living at Broadway and who do not want to move to the newly constructed RAD projects. The AAHC will use a combination of CFP funds and other funds to renovate the buildings at Broadway.

**West Washington and Evelyn:** the AAHC was originally planning on selling W Washington and Evelyn because they are a duplex and single family home, which are more expensive to maintain. These properties will lose their subsidy through de minimis reduction under the RAD program. The AAHC will only sell these properties if additional funding is needed to renovate a larger property. Otherwise, the AAHC will continue to own and manage these properties and make them available to tenants who will be subsidized by a voucher program. The AAHC will use a combination of CFP funds and other funds to renovate these buildings.

### **Section B.5 Progress Report**

*Please see the 4 goals from FY 15 – FY 19 Plan with a progress report for each goal*

- 1) *Complete Redevelopment of all public housing units to Project Based Vouchers through the Rental Assistance Demonstration (RAD) project*

*The AAHC has been approved by HUD to redevelop all of its public housing to project based vouchers under the RAD program. Phase 1 has received financing, closed with HUD and is under renovation. Phase 2 is completed. Phase 3 has received financing, closed with HUD and is under construction. Phase 4 is seeking financing. Phase 5 (scattered sites above) is completed.*

- 2) *Develop new affordable housing*
  - a. *At existing public housing sites*
  - b. *New properties*

*The AAHC received site plan approval for 3 RAD properties to demolish and build new housing. The Phase 3 location at N. Maple will be adding 23 apartments. The Phase 4 location at White/State/Henry will be adding 4 apartments and Lower Platt will be adding 28 apartments. The AAHC purchased a property adjacent to Lower Platt to expand the site plan and add more apartments.*

- 3) *Increase the number of Project-Based Vouchers in the City of Ann Arbor and other communities in Washtenaw County that have a strong economic base and public transportation.*
  - a. *Issue a Request for Proposal for to project-base up to 20% of the AAHC's budget authority in order to de-concentrate poverty and expanding housing and economic opportunities for very low-income and special needs households in the City of Ann Arbor. It is projected that about 200 vouchers will be converted to project-based vouchers.*

*The AAHC issued a RFP to project-base vouchers in the City of Ann Arbor and received applications for 218 project based vouchers and approved 183 units.*

- 4) *Increase supportive housing for residents with complex needs spanning from homelessness, mental illness, substance use disorders, and/or other physical/mental disabilities.*
  - a. *Increase support services for tenants in affordable housing and voucher program*
  - b. *Through community partnerships*
  - c. *Additional funding sources*

*The AAHC partnered with Avalon Housing, Ozone House, CSTS, Ypsilanti Housing Commission and HIV/AIDS Resource Center to provided housing and services to chronically homeless individuals and families through the HUD Continuum of Care program. The partners applied for funding to house and provide services for 109 households and were awarded \$1,058,000 in annually renewable funding for 78 households in FY15. 63 of these households will be housed at AAHC properties and Avalon, CSTS and Ozone House will be providing on-site services. These funds have enabled Avalon to provide 24/7 services at Miller Manor. HUD will announce the awards for the remaining application for 31 households by April 2016.*

*The AAHC is partnering with SOS to apply for funding to hire a case manager to help AAHC voucher tenants to help them to maintain their vouchers. The program has received \$20,000 from RAAH (Religious Action for Affordable Housing) and is applying for additional funding from the Coordinated Funding Program.*

The AAHC is partnering with CAN (Community Action Network) to apply for funding to provide on-site community center services at the new Lower Platt Community Center.

### ***Section D.2 Resident Advisory Board Comments***

The RAB met on February 25, 2016 to discuss the draft Annual Plan, CFP grant and a variety of other subjects.

The RAB did not have specific comments about Annual Plan Changes regarding Admissions, Waitlist, Voucher Service Area, Family Self-Sufficiency and Project-Based Vouchers. They did have comments about the following plan elements:

- 1) **Rent Determination as impacted by Utility Allowances for Project-Based Vouchers.** RAB members asked questions for clarification such as making sure that tenants would be notified when the changes are implemented, but did think the change was fair.
- 2) **Over-Income Tenants.** The RAB had many questions and comments about how to implement an over-income tenant move-out policy. RAB members felt that terminating someone for being over-income required safety measures to ensure that the tenant was securely over-income and not just temporarily over-income. They felt that 6 months was too short a time to make that determination. One or two years was recommended. Some RAB members also wanted to ensure that the AAHC was providing social services to assist the family who was over-income to stabilize outside of the AAHC program. One RAB member felt that if a family was over-income then they should not need additional help from the AAHC. Other RAB members were concerned about credit issues. Someone may have a high income but also have poor credit which could prevent them from moving to an unsubsidized apartment in the private sector. The RAB members suggested that one of the criteria in addition to income could be having a minimum credit score. An RAB member asked if someone's only income who was over-income was Social Security Disability and/or Social Security Income would they still be required to move?

***AAHC response:*** *The AAHC is waiting for further guidance from HUD on how to implement over-income tenant terminations from public housing. However, the AAHC does not expect to have any public housing apartments left by 2017. The AAHC does not have the resources to assist over-income tenants adjust to leaving the program. The AAHC will find out from HUD once HUD publishes more guidance on over-income public housing tenants whether the source of income is a factor to consider.*

- 3) **Operations and Management.** The RAB asked questions for clarification about what the impact would be if the AAHC became a Moving To Work agency. The RAB members commented that it would be good to require eligible tenants to perform work or volunteer as a condition of their voucher eligibility so that they can improve their financial situation and have something to do.
- 4) **Pets.** The RAB had a lengthy discussion about the proposed pet policy. The RAB members who had pets wanted to ensure that the change would not impact their existing pets. RAB members supported the AAHC going pet-free at new locations because there are people who are allergic to pets and some people don't clean-up after or take care of their pets. The RAB members wanted to make sure that Service pets would still be allowed no matter where a tenant lived.

**AAHC response:** *Current properties will continue to have the same pet policy, so current tenants will not be impacted. The pet free policy will only apply to newly constructed properties. Service animals will be allowed at all properties, as required by the law.*

- 5) **Other topics.** The group talked about individual property issues. Several RAB members requested that the AAHC provide an envelope or clips or something else to hang flyers on so that they do not blow away. AAHC staff currently try to slide the flyers between the crack in the door and door frame or between the door handle and door frame but that does not work on a rainy or windy day.

**AAHC response:** *The AAHC is purchasing plastic bags to hang from door knobs so that flyers and notices do not get wet or blow away.*

RAB members who live at Green-Baxter Court requested that the AAHC check with the tenants about how to stripe the parking lot because they have been parking in a more efficient pattern than the current striping allows. RAB members also asked about what the plans were for a fence along the parking lot at GBC? RAB members at GBC asked if the City of Ann Arbor could build a parking lot at the adjacent park so that people would stop parking in the GBC parking lot?

**AAHC response:** *The AAHC asked the contractor to work with the property manager and tenants at GBC to restripe the parking lot after the pavement is replaced. The AAHC is still trying to figure out how to install a fence along the edge of the parking lot to block out car lights from tenant apartments, however, the slope is challenging. The city will not allow a fence to be installed in the slope because it can impede water flow and make water flow into the buildings. An RAB member who lives in that building indicated water is already getting into the new building door. The AAHC will work with the engineer and contractor how to do a better job with drainage in that location but are not able to build steps or any other items on that slope between the parking lot and the building due to drainage issues. The AAHC asked the City in 2014 if they could build a parking lot in the adjacent park for the public and the City indicated that they do not build parking lots for small neighborhood parks – the assumption is that people will walk to the park, not drive.*

**Other comments included:** One RAB member was continuing to have mail problems but believes the post office had her wrong address. One RAB member indicated that the AAHC was good at replacing parking passes that are destroyed and the AAHC clarified that parking passes will only be replaced if the tenant can bring in or show evidence that the pass is no longer usable. The AAHC will not replace a parking pass for a tenant who claims they lost it because of the large number of tenants who say they have lost a parking pass in order to get a 2<sup>nd</sup> one for a friend or family member. One RAB member with a voucher discussed her current landlord problems and the AAHC discussed her legal options and encouraged her to document her requests and escrow any rent she was not paying. A couple RAB members suggested that the AAHC install fake cameras at locations where real cameras are not feasible.

## *AAHC Policies on De-concentration of Poverty*

### **Chapter 5**

#### **Oral Briefing [24 CFR 982.301(a)]**

Each briefing must provide information on the following subjects:

- How the Housing Choice Voucher program works;
- Family and owner responsibilities;
- Where the family can lease a unit, including renting a unit inside or outside the PHA's jurisdiction;
- For families eligible under portability, an explanation of portability. The PHA cannot discourage eligible families from moving under portability;
- For families living in high-poverty census tracts, an explanation of the advantages of moving to areas outside of high-poverty concentrations; and
- For families receiving welfare-to-work vouchers, a description of any local obligations of a welfare-to-work family and an explanation that failure to meet the obligations is grounds for denial of admission or termination of assistance.

#### PHA Policy

When PHA-owned units are available for lease, the PHA will inform the family during the oral briefing that the family has the right to select any eligible unit available for lease, and is not obligated to choose a PHA-owned unit.

### **Chapter 13**

#### **13-I.A. OWNER RECRUITMENT AND RETENTION [HCV GB, pp. 2-4 to 2-6]**

##### **Recruitment**

PHAs are responsible for ensuring that very low income families have access to all types and ranges of affordable housing in the PHA's jurisdiction, particularly housing outside areas of poverty or minority concentration. A critical element in fulfilling this responsibility is for the PHA to ensure that a sufficient number of owners, representing all types and ranges of affordable housing in the PHA's jurisdiction, are willing to participate in the HCV program.

To accomplish this objective, PHAs must identify and recruit new owners to participate in the program.

#### PHA Policy

The PHA will conduct owner outreach to ensure that owners are familiar with the program and its advantages. The PHA will actively recruit property owners with property located outside areas of poverty and minority concentration. These outreach strategies will include:

Distributing printed material about the program to property owners and managers

Contacting property owners and managers by phone or in-person



Holding owner recruitment/information meetings at least once a year

Participating in community based organizations comprised of private property and apartment owners and managers

Developing working relationships with owners and real estate brokers associations

Outreach strategies will be monitored for effectiveness, and adapted accordingly.

## Chapter 15

### 15-VII.F. HOMEOWNERSHIP COUNSELING [24 CFR 982.630]

Before commencement of homeownership assistance for a family, the family must attend and satisfactorily complete the pre-assistance homeownership and housing counseling program required by the PHA. HUD suggests the following topics for the PHA-required pre-assistance counseling:

- Home maintenance (including care of the grounds);
- Budgeting and money management;
- Credit counseling;
- How to negotiate the purchase price of a home;
- How to obtain homeownership financing and loan pre-approvals, including a description of types of financing that may be available, and the pros and cons of different types of financing;
- How to find a home, including information about homeownership opportunities, schools, and transportation in the PHA jurisdiction;
- Advantages of purchasing a home in an area that does not have a high concentration of low-income families and how to locate homes in such areas;
- Information on fair housing, including fair housing lending and local fair housing enforcement agencies; and
- Information about the Real Estate Settlement Procedures Act (12 U.S.C. 2601 et seq.) (RESPA), state and Federal truth-in-lending laws, and how to identify and avoid loans with oppressive terms and conditions.

The PHA may adapt the subjects covered in pre-assistance counseling (as listed) to local circumstances and the needs of individual families.

The PHA may also offer additional counseling after commencement of homeownership assistance (ongoing counseling). If the PHA offers a program of ongoing counseling for participants in the homeownership option, the PHA shall have discretion to determine whether the family is required to participate in the ongoing counseling.

If the PHA does not use a HUD-approved housing counseling agency to provide the counseling, the PHA should ensure that its counseling program is consistent with the counseling provided under HUD's Housing Counseling program.

## Policy

Families will not be required to participate in ongoing counseling after commencement of homeownership assistance.

### Chapter 16

#### Updating Payment Standards

When HUD updates its FMRs, the PHA must update its payment standards if the standards are no longer within the basic range [24 CFR 982.503(b)]. HUD may require the PHA to make further adjustments if it determines that rent burdens for assisted families in the PHA's jurisdiction are unacceptably high [24 CFR 982.503(g)].

#### PHA Policy

The PHA will review the appropriateness of the payment standards on an annual basis when the new FMR is published, and at other times as determined necessary. In addition to ensuring the payment standards are always within the "basic range" the PHA will consider the following factors when determining whether an adjustment should be made to the payment standard schedule:

**Funding Availability:** The PHA will review the budget to determine the impact projected subsidy adjustments will have on funding available for the program and the number of families served. The PHA will compare the number of families who could be served under revised payment standard amounts with the number assisted under current payment standard amounts.

**Rent Burden of Participating Families:** Rent burden will be determined by identifying the percentage of families, for each unit size, that are paying more than 30 percent of their monthly adjusted income as the family share. When 40 percent or more of families, for any given unit size, are paying more than 30 percent of adjusted monthly income as the family share, the PHA will consider increasing the payment standard. In evaluating rent burdens, the PHA will not include families renting a larger unit than their family unit size.

**Quality of Units Selected:** The PHA may review the quality of units selected by participant families when making the determination of the percent of income families are paying for housing, to ensure that payment standard increases are only made when needed to reach the mid-range of the market.

**Changes in Rent to Owner:** The PHA may review a sample of the units to determine how often owners are increasing or decreasing rents and the average percent of increases/decreases by bedroom size.

**Unit Availability:** The PHA will review the availability of units for each unit size, particularly in areas with low concentrations of poor and minority families.

**Lease-up Time and Success Rate:** The PHA will consider the percentage of families that are unable to locate suitable housing before the voucher expires and whether families are leaving the jurisdiction to find affordable housing.

Changes to payment standard amounts will be effective on December 1<sup>st</sup> of every year unless, based on the proposed FMRs, it appears that one or more of the PHA's current payment standard amounts will be outside the basic range when the final FMRs are published. In that case, the PHAs payment standards will be effective October 1<sup>st</sup> instead of December 1<sup>st</sup>.

If the PHA has already processed reexaminations that will be effective on or after October 1<sup>st</sup>, and the effective date of the payment standards is October 1<sup>st</sup>, the PHA will make retroactive adjustments to any such reexaminations if the new payment standard amount is higher than the one used by the PHA at the time the reexamination was originally processed.

## **Chapter 17**

### **17-II.G. SITE SELECTION STANDARDS**

#### **Compliance with PBV Goals, Civil Rights Requirements, and HQS Site Standards [24 CFR 983.57(b)]**

The PHA may not select a proposal for existing, newly constructed, or rehabilitated PBV housing on a site or enter into an agreement to enter into a HAP contract or HAP contract for units on the site, unless the PHA has determined that PBV assistance for housing at the selected site is consistent with the goal of deconcentrating poverty and expanding housing and economic opportunities. The standard for deconcentrating poverty and expanding housing and economic opportunities must be consistent with the PHA Plan under 24 CFR 903 and the PHA administrative plan.

In addition, prior to selecting a proposal, the PHA must determine that the site is suitable from the standpoint of facilitating and furthering full compliance with the applicable Civil Rights Laws, regulations, and Executive Orders, and that the site meets the HQS site and neighborhood standards at 24 CFR 982.401(l).

HUD waived compliance with Site Selection Standards for RAD units having to do with de-concentration of poverty and expanding housing and economic opportunity, for the existing site. HUD waived section 8(o)(13)(C)(ii) and Section 983.57(b)(1) & (c).

#### PHA Policy

It is the PHA goal to select sites for PBV housing that provide for deconcentrating poverty and expanding housing and economic opportunities. In complying with this goal the PHA will limit approval of sites for PBV housing in census tracts that have poverty concentrations of 20 percent or less.

However, the PHA will grant exceptions to the 20 percent standard where the PHA determines that the PBV assistance will complement other local redevelopment activities designed to

deconcentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations greater than 20 percent, such as sites in:

A census tract in which the proposed PBV development will be located in a HUD-designated Enterprise Zone, Economic Community, or Renewal Community;

A census tract where the concentration of assisted units will be or has decreased as a result of public housing demolition and HOPE VI redevelopment;

A census tract in which the proposed PBV development will be located is undergoing significant revitalization as a result of state, local, or federal dollars invested in the area;

A census tract where new market rate units are being developed where such market rate units will positively impact the poverty rate in the area;

A census tract where there has been an overall decline in the poverty rate within the past five years;

A census tract where there are meaningful opportunities for educational and economic advancement; or

A census tract where more than 50% of residents are post-secondary students (college students).

A project that is providing permanent supportive housing which provides a wide spectrum of supportive services including at least 5 of the services listed above under supportive services.

#### **Existing and Rehabilitated Housing Site and Neighborhood Standards [24 CFR 983.57(d)]**

The PHA may not enter into an agreement to enter into a HAP contract nor enter into a HAP contract for existing or rehabilitated housing until it has determined that the site complies with the HUD required site and neighborhood standards. The site must:

- Be adequate in size, exposure, and contour to accommodate the number and type of units proposed;
- Have adequate utilities and streets available to service the site;
- Promote a greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high proportion of low-income persons;
- Be accessible to social, recreational, educational, commercial, and health facilities and services and other municipal facilities and services equivalent to those found in neighborhoods consisting largely of unassisted similar units; and
- Be located so that travel time and cost via public transportation or private automobile from the neighborhood to places of employment is not excessive.

#### **New Construction Site and Neighborhood Standards [24 CFR 983.57(e)]**

In order to be selected for PBV assistance, a site for newly constructed housing must meet the following HUD required site and neighborhood standards:

- The site must be adequate in size, exposure, and contour to accommodate the number and type of units proposed;
- The site must have adequate utilities and streets available to service the site;
- The site must not be located in an area of minority concentration unless the PHA determines that sufficient, comparable opportunities exist for housing for minority families in the income range to be served by the proposed project outside areas of minority concentration or that the project is necessary to meet overriding housing needs that cannot be met in that housing market area;
- The site must not be located in a racially mixed area if the project will cause a significant increase in the proportion of minority to non-minority residents in the area.
- The site must promote a greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high proportion of low-income persons;
- The neighborhood must not be one that is seriously detrimental to family life or in which substandard dwellings or other undesirable conditions predominate;
- The housing must be accessible to social, recreational, educational, commercial, and health facilities and services and other municipal facilities and services equivalent to those found in neighborhoods consisting largely of unassisted similar units; and
- Except for housing designed for elderly persons, the housing must be located so that travel time and cost via public transportation or private automobile from the neighborhood to places of employment is not excessive.

Part I: Summary					
ANN ARBOR HOUSING COMMISSION		Grant Type and Number Capital Fund Program Grant No: MI28P06450116 Replacement Housing Factor Grant No: _____ Date of CFFP: _____			FFY of Grant: 2016
					FFY of Grant Approval 2016
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement(revision no: ) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: _____ <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21)	\$ -	\$ -	\$ -	\$ -
3	1408 Management Improvements	\$ -	\$ -	\$ -	\$ -
4	1410 Administration(may not exceed 10% of line 21)	\$ -	\$ -	\$ -	\$ -
5	1411 Audit	\$ -	\$ -	\$ -	\$ -
6	1415 Liquidated Damages				
7	1430 Fees and Costs	\$ -	\$ -	\$ -	\$ -
8	1440 Site Acquisition				
9	1450 Site Improvement		\$ -	\$ -	\$ -
10	1460 Dwelling Structures	\$ 21,301.00	\$ -	\$ -	\$ -
11	1465.1 Dwelling Equipment-Nonexpendable	\$ -	\$ -	\$ -	\$ -
12	1470 Non-dwelling Structures	\$ 59,892.00	\$ -	\$ -	\$ -
13	1475 Non-dwelling Equipment	\$ -	\$ -	\$ -	\$ -
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities				
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)	\$ -	\$ -	\$ -	\$ -
20	1504 RAD-CFP	\$ -	\$ -	\$ -	\$ -
21	Amount of Annual Grant: (sum of lines 2-19)	\$ 81,193.00	\$ -	\$ -	\$ -
22	Amount of line 20 Related to LBP Activities				
23	Amount of line 20 Related to Section 504 Activities				
24	Amount of line 20 Related to Security-Soft Costs				
25	Amount of line 20 Related to Security-Hard Costs				
26	Amount of line 20 Related to Energy Conservation Measures				

49357

1) Total Actual Cost - to be completed for the Performance and Evaluation Report  
 2) Revised Budget-to be completed for the Performance and Evaluation Report  
 3)PHA's with under 250 units may use 100% of CFP Grants for operations  
 4)Line 17-RHF funds shall be included here.

Expires 6/30/2017

<b>Part I: Summary</b>			
ANN ARBOR HOUSING COMMISSION	<b>Grant Type and Number</b> Capital Fund Program Grant No: MI28P06450116_____Replacement Housing Factor Grant No:_____ Date of CFFP:_____	<b>FFY of Grant:</b> 2016 <b>FFY of Grant Approval</b> 2016	
<b>Type of Grant</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement(revision no:    ) <input type="checkbox"/> Performance and Evaluation Report for Period Ending:_____ <input type="checkbox"/> Final Performance and Evaluation Report			
<b>Line</b>	<b>Summary by Development Account</b>	<b>Total Estimated Cost</b>	<b>Total Actual Cost</b>
		<b>Original</b>	<b>Original                      Obligated                      Expended</b>
Signature of Executive Director		Date	Signature of Public Housing Director                      Date

Part II: Supporting Pages								
ANN ARBOR HOUSING COMMISSION			CAPITAL FUND NO: CFP501-16		CFFP (Yes/No) NO		Federal FFY of Grant: 2016	
			Capital Fund Program Grant No: MI28P06450116					
			Replacement Housing Factor Grant No: N/A					
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
<b>PHA-WIDE</b>	Operations	1406		\$ -				
	Resident Initiatives	1408		\$ -				
	Staff Training	1408		\$ -				
	Computer Software Upgrade	1408		\$ -				
	Family Supportive Services	1408		\$ -				
	Administrative Salaries	1410		\$ -				
	Audit	1411		\$ -				
	Clerk of the Works	1430		\$ -				
	A&E Fees	1430		\$ -				
	Advertisements	1430		\$ -				
	PHA Wide-Furnaces	1460		\$ -				
	Appliances	1465		\$ -				
	Office Equipment	1475		\$ -				
	Computer Equipment	1475		\$ -				
	Contingency	1502		\$ -				
	RAD-CFP	1504		\$ -				
	<b>Sub-Total</b>			\$ -	\$ -	\$ -	\$ -	
<b>West</b>	<b>Sub-Total</b>			\$ -	\$ -	\$ -	\$ -	
<b>East</b>	BR-vinyl windows	1470		\$ 21,600.00				
	BR-insulation	1470		\$ 10,000.00				
	BR-unit entry doors	1460		\$ 15,000.00				
	BR-paint hallways	1470		\$ 1,600.00				
	BR-LED Fixtures	1460		\$ 6,300.00				
	BR-siding	1470		\$ 5,600.00				
	BR-store front entry doors	1470		\$ 21,089.00				
	BR-interior work	1460		\$ 1.00				
	BR-Electrical Work	1470		\$ 1.00				
	BR-Furnace/Hotwater Heaters	1470		\$ 1.00				
	BR-Intercom System	1470		\$ 1.00				
	<b>Sub-Total</b>			\$ 81,193.00	\$ -	\$ -	\$ -	
	<b>GRAND TOTAL</b>			\$ 81,193.00	\$ -	\$ -	\$ -	
				\$ -				
				\$ -				

1) Revised Budget to be completed for Performance and Evaluation Report or a Revised Annual Statement  
 2) Funds Obligated/Expended to be completed for the Performance and Evaluation Report



<b>Part II: Supporting Pages</b>								
ANN ARBOR HOUSING COMMISSION			CAPITAL FUND NO: CFP501-16		CFFP (Yes/No)	NO	Federal FFY of Grant: 2016	
			Capital Fund Program Grant No: MI28P06450116					
			Replacement Housing Factor Grant No: N/A					
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	

1) Revised Budget to be completed for Performance and Evaluation Report or a Revised Annual Statement  
 2) Funds Obligated/Expended to be completed for the Performance and Evaluation Report

Part III: Implementation Schedule for Capital Fund Financing Program					
ANN ARBOR HOUSING COMMISSION				Federal FFY of Grant:	
Development Number Name/PHA-Wide Activities	All Funds Obligated _____		All Funds Expended _____		Reasons for Revised Target Dates
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	

1) Reasons for Revised Target Dates-Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

<b>Part III: Implementation Schedule for Capital Fund Financing Program</b>					
ANN ARBOR HOUSING COMMISSION				Federal FFY of Grant:	
Development Number Name/PHA-Wide Activities	All Funds Obligated _____		All Funds Expended _____		Reasons for Revised Target Dates
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	

1) Reasons for Revised Target Dates-Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

**Capital Fund Program---Five-Year Action Plan**

**U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011**

<b>Part I: Summary</b>							
ANN ARBOR HOUSING COMMISSION/MI064		ANN ARBOR/WASHTENAW/MICHIGAN			<input checked="" type="checkbox"/>	Original 5-Year Plan	Revision No:
A.	Development Number and Name	Work Statement for Year 1 FFY 16 CY 2015 Grant	Work Statement for Year 2 FFY 17 CY 2016 CFP Grant	Work Statement for Year 3 FFY 18 CY 2017 CFP Grant		Work Statement for Year 4 FFY 19 CY 2018 CFP Grant	Work Statement for Year 5 FFY 20 CY 2019 CFP Grant
B.	Physical Improvements Subtotal	<b>Annual Statement</b>	\$ 504,900	\$ -		\$ -	\$ -
C.	Management Improvements		\$ -	\$ -		\$ -	\$ -
D.	PHA-Wide Non-dwelling Structures and Equipment		\$ -	\$ -		\$ -	\$ -
E.	Administration		\$ -	\$ -		\$ -	\$ -
F.	Other		\$ -	\$ -		\$ -	\$ -
G.	Operations		\$ -	\$ -		\$ -	\$ -
H.	Demolition		\$ -	\$ -		\$ -	\$ -
I.	Development		\$ -	\$ -		\$ -	\$ -
J.	Capital Fund Financing-Debt Service		\$ -	\$ -		\$ -	\$ -
K.	Total CFP Funds		\$ 504,900	\$ -		\$ -	\$ -
L.	Total Non-CFP Funds						
M.	Grand Total		\$ 504,900	\$ -		\$ -	\$ -

**Capital Fund Program---Five-Year Action Plan**

**U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011**

<b>Part I: Summary</b>							
ANN ARBOR HOUSING COMMISSION/MI064		ANN ARBOR/WASHTENAW/MICHIGAN			<input checked="" type="checkbox"/>	Original 5-Year Plan	Revision No:
A.	Development Number and Name	Work Statement for Year 1 FFY 16 CY 2015 Grant	Work Statement for Year 2 FFY 17 CY 2016 CFP Grant	Work Statement for Year 3 FFY 18 CY 2017 CFP Grant		Work Statement for Year 4 FFY 19 CY 2018 CFP Grant	Work Statement for Year 5 FFY 20 CY 2019 CFP Grant
		<b>Annual Statement</b>					
B.	MI064100-West Side	\$ -	\$ -	\$ -		\$ -	\$ -
B.	MI064200-East Side	\$ 504,900	\$ -	\$ -		\$ -	\$ -
C.	Management Improvements	\$ -	\$ -	\$ -		\$ -	\$ -
D.	PHA-Wide Non-dwelling Structures and Equipment	\$ -	\$ -	\$ -		\$ -	\$ -
E.	Administration	\$ -	\$ -	\$ -		\$ -	\$ -
F.	Other	\$ -	\$ -	\$ -		\$ -	\$ -
G.	Operations	\$ -	\$ -	\$ -		\$ -	\$ -
H.	Demolition	\$ -	\$ -	\$ -		\$ -	\$ -
I.	Development	\$ -	\$ -	\$ -		\$ -	\$ -
J.	Capital Fund Financing-Debt Service	\$ -	\$ -	\$ -		\$ -	\$ -
K.	Total CFP Funds	\$ 504,900	\$ -	\$ -		\$ -	\$ -
L.	Total Non-CFP Funds						
M.	Grand Total	\$ 504,900	\$ -	\$ -		\$ -	\$ -













U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-5000

PRINCIPAL DEPUTY ASSISTANT SECRETARY  
FOR PUBLIC AND INDIAN HOUSING

September 3, 2015

Dear Executive Director:

The Public Housing program is an essential resource for some of the nation's most vulnerable families. HUD strongly supports the efforts of public housing agencies (PHAs) to further the goals of providing quality affordable housing to eligible families in a manner that moves families toward increased and sustained self-sufficiency. At the same time, scarce public resources must be provided to those most in need of deeply affordable housing.

HUD affirmed this on August 1, 2003, when it published 24 CFR 960.261 (FR-4824-F-02) giving PHAs more discretion to establish local occupancy policies that limit lease renewals for families who, though income eligible at the time of admission, became over-income while on the program. Such policies would thereby make units available for applicants who are currently income eligible. HUD will reiterate this policy in an upcoming notice related to flat rent requirements, by stating that the purpose of flat rents is to ensure that families with higher incomes pay an appropriate market-based rent.

In July 2015, the Office of the Inspector General (OIG) published its findings of audit 2015-PH-0002, *Over-income Families in Public Housing*. That audit identified several cases where families had incomes that were "excessively" above the income threshold. The OIG also found that, of the PHAs sampled, none were using their discretion to evict or otherwise terminate the tenancy of over-income families.

PHAs are reminded that, except for regulatory limitations on evicting families receiving the Earned Income Disregard and families participating in the Family Self-Sufficiency program<sup>1</sup>, PHAs have the discretion to terminate the tenancy of over-income households. PHAs should ensure they are balancing the important goals of supporting the sustained self-sufficiency of families with the ever increasing demand for affordable housing units among families on their waiting lists.

HUD strongly encourages PHAs to utilize the discretion available to them to remove extremely-over-income families from public housing. As a first step to aid PHAs in limiting the most egregious over-income cases from continuing to reside in public housing, HUD encourages PHAs to adopt local policies while considering many factors, including, but not limited to:

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<sup>1</sup> 24 CFR 960.261

- *Definition of over-income* – In most localities, the HUD-defined program income limits reflect the actual local area median income (AMI); however, in certain markets with substantially higher incomes, HUD applies the national AMI for program income limits. In these markets, PHAs may choose to apply the actual local AMI to any policies that limit continued occupancy by over-income families to reflect the higher cost of living.
- *Income Stability* – Family income may fluctuate considerably, so PHAs might consider the length of time a family’s income must meet or exceed a certain over-income threshold in order to be considered self-sufficient.
- *Length of time for safety net* – When determining factors that impact how long a family may remain in public housing after becoming over-income, PHAs might consider many factors such as cost and availability of suitable housing, or other family factors such as elderly or disability status.
- *Preference for Return* – PHAs may create a preference for public housing or other assisted housing programs for families removed from public housing because they are over-income, but whose income drops shortly after they leave the program.
- *Hardship Policy* – PHAs could choose to adopt a hardship policy that would allow families to petition to stay in the event of a change in household composition or a drop in income due to factors outside of the tenant’s control (i.e., factory closing, disability, or illness/death).

HUD is reviewing data and related information to understand the impact of potential national policy changes, while continuing to provide a balance between achieving the core program goal of serving low income families and encouraging families to become self-sufficient.

Again, HUD strongly encourages PHAs to consider utilizing the discretion afforded to them to ensure that public housing is available for the nation’s most vulnerable families. We look forward to working with you to achieve this goal.

Sincerely,



Lourdes Castro Ramírez  
Principal Deputy Assistant Secretary