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| <b>Streamlined Annual<br/>PHA Plan<br/>(Small PHAs)</b> | <b>U.S. Department of Housing and Urban Development<br/>Office of Public and Indian Housing</b> | <b>OMB No. 2577-0226<br/>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: _____</p> <p>PHA Type: <input type="checkbox"/> Small <input type="checkbox"/> High Performer</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): _____</p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Public Housing (PH) Units _____ Number of Housing Choice Vouchers (HCVs) _____</p> <p>Total Combined _____</p> <p>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: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 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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| <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>   |

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| <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?<br/>Y N</p> <p><input type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.<br/> <input type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.<br/> <input type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.<br/> <input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.<br/> <input type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.<br/> <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<br/> <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 Proposed Changes FY20**

**Statement of Housing Needs and Strategy for Addressing Housing Needs.**

The AAHC currently has the following preferences persons with a disability, residential, and homeless. About 50% of the AAHC's voucher tenants are non-elderly disabled households. AAHC opened the HCV Waiting List for one week, on November 12, 2018; we received over 4,300 applications. Below are the demographics as reported by the applicants:

|                                  |           |
|----------------------------------|-----------|
| White                            | 845       |
| Black                            | 3093      |
| Asian                            | 23        |
| American Indian                  | 8         |
| Pacific Islander                 | 16        |
| Multiple Race                    | 316       |
| No Identification                | 2         |
| Hispanic                         | 137       |
| Non-Hispanic                     | 4166      |
| Female                           | 3375      |
| Male                             | 928       |
| Average Annual Income            | \$10,948  |
| Average Household Size           | 2 Persons |
| Near Elderly (Age 55-60)         | 602       |
| Elderly (Age 62 and older)       | 187       |
| Disabled                         | 1532      |
| Homeless                         | 1683      |
| Non-Elderly Disabled (Age 18-61) | 1369      |

**Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.**

**4-II.B. Organization of the Waiting List**

Previously, the administrative plan policy said that applicants may submit an application online once AAHC converts to an online application process. AAHC has since purchased a software system for online applications. The current policy changes requires families to submit an application using the online system, except for reasonable accommodation. In addition, AAHC included language that a family may only submit one application during the opening application period.

**4-II.C. Opening and Closing the Waiting List**

Under the previous policy, AAHC will place applicants on the waiting list using a first come first served method. This method is driven by date and time of application. AAHC added language to include both first come first serve, and the random lottery selection method for placing applicants on the waiting list. By including both methods, AAHC will have the option to use either method, accordingly.

## **17-VI.C. ORGANIZATION OF THE WAITING LIST**

HUD requires AAHC to list the number of waiting list it will manage. AAHC currently manages one waiting for the HCV program, one list for the AAAHC properties converted under the RAD program, and one list for a PBV property not owned by AAHC. AAHC will maintain one list for PBV properties not owned by the AAHC, at the request of the owner. The administrative plan has been amended to reflect these changes.

### **Closing the Waiting List**

The language in this section of the administrative plan suggested the AAHC maintained a pool of applicant sufficient for 24 months. AAHC amended the language to allow flexibility in determining an adequate pool of waiting list applicants on an as needed basis. HUD regulation requires the AAHC to post a public notice, including community partners, and social service agencies. Also, HUD regulation requires PHA's to implement fair housing practices and provide reasonable accommodations for a disabled person. AAHC adopted a policy to continue to receive applications for applicants eligible for targeted funding programs.

### **4-II.E. Reporting Changes in Family Circumstances**

Previously, the policy states that applicants must submit changes in writing. AAHC amended the policy requiring applicants to make changes online using the online system, unless an applicant requests a reasonable accommodation to submit it over the phone or in writing.

### **4-II.F. Updating the Waiting List: Purging**

The policy language regarding purging the waiting list was removed because HUD regulation provides procedures to remove families from the waiting list.

### **4-III.C. Selection Method**

The administrative plan was amended to include language that a PHA is not required to establish a preference when the PHA receives HUD targeted funding. Also, language was included to clarify that the PHA may continue to accept applications for applicants eligible for HUD targeted funding when the waiting list is closed, according to PIH Notice 2012-34.

### **Local Preferences**

In addition, the Violence Against Women Act (VAWA) local preference was removed because VAWA victims are eligible to receive a voucher immediately under the AAHC Emergency Transfer Policy.

## **Chapter 6: Income and Determining Subsidy**

### **Child Support**

AAHC amended the policy used to verify child support income. The AAHC no longer requires families to show evidence they have tried to collect child support payments. Additional amendments provided in Chapter 7 removes the language requiring families to provide proof of child support payment enforcement.

### **7-II.A. Verification of Legal Identity**

Families must provide documents to verify their identity. The policy amendment allows AAHC to accept Social Security Administration Benefit letters from adults and Hospital Certified Proof of Birth documents for children as proof of identity.

### **7-II.D. Family Relationships Separation or Divorce**



Families must provide documents to verify their marital status, if applicable. In addition, the policy amendment allows the acceptance of certified affidavits as proof of separation and divorce.

### **7-III.B. Business and Self Employment Income**

Previously, AAHC policy required PHA staff to assist with developing financial statements for families who have business income. The amended policy allows AAHC to accept income tax statements or audited financials as verification of income.

### **11-I.B Streamlined Annual Reexaminations**

Previously, AAHC policy required re-certifications effective January 1<sup>st</sup> or later to include the Social Security Administration (SSA) COLA increases. AAHC adopted a policy to streamline this process. AAHC policy now states that only incomplete re-certifications that are effective January 1<sup>st</sup> or later will include the SSA COLA increase. Additional amendments provided in Chapter 11 adds the language requiring only incomplete Annual recertification effective January 1<sup>st</sup> or later must include the SSA COLA increase.

### **11-II.C. Changes Affecting Income or Expenses**

AAHC clarified the language regarding PHA-initiated and Family-initiated interims. PHA staff start PHA-initiated interims. The family starts family-initiated interims. AAHC provided clarification regarding when the PHA and the family must initiate interim re-certifications. The AAHC will conduct an interim reexamination for Earned Income Disallowance (EID) eligible families at initial, phase-in, and completion of their EID participation. In addition, AAHC will conduct an interim reexamination for zero-income families every six months. Lastly, AAHC will conduct an interim reexamination at any time the families income is annualized because third party verification was not obtained but later provided, and anytime the PHA determine it necessary to correct tenant rent or housing assistance payments. Family-initiated interim reexamination will be conducted for Family Self-Sufficiency participants and EID participants.

## Financial Resources

| 2020 Planned Financial Sources and Uses                  |                     |  |
|--|---------------------|--|
| Federal Sources:   | Planned (Est.)      | Planned Uses   |
| HUD PHA operating subsidy                                | \$5,000             | Turnkey III unit Operations  |
| Public Housing Capital Fund<br>CFP501-19 Grant Estimated | \$110,000           | Central Office Operations  |
| Housing Choice Voucher/VASH/FUP/NED<br>HAP Grants        | \$13,000,000        | HCV and PBV HAP Expenses.<br>including RAD PBV, NED, FUP and<br>VASH |
| Housing Choice Voucher Admin Fees                        | \$1,300,000         | HCV/NED/FUP/VASH/PBV Admin<br>Expenses                               |
| Continuum of Care  | \$670,000           | Rent, Administration and Services                                    |
| Family Self Sufficiency                                  | \$140,000           | Family Self Sufficiency program                                      |
| Other (Interest Income, Fraud Recovery)                  | \$60,000            | Voucher Programs and Central<br>Office                               |
|  |                     |  |
| <b>Non-federal sources</b> (list below)                  |                     |  |
| Tenant Rent  | \$3,000             | Turnkey III unit Operations  |
| City of Ann Arbor General Fund                           | \$160,000           | Voucher Administration and<br>Central Office                         |
| Other Revenue  | \$700,000           | Management Fees  |
| <b>Total resources</b>                                   | <b>\$16,148,000</b> |  |

### Moving To Work – Voucher & Public Housing Program (Proposed)

The AAHC is considering applying to HUD to become a Moving To Work (MTW) agency. Congress has approved expansion of the program to 100 Public Housing Agencies. The following excerpts are copied from 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.

***What are MTW agencies permitted to do under MTW?***

PHAs selected for the demonstration are permitted to seek exemption from many existing Public Housing and Housing Choice Voucher program rules found in the United States Housing Act of 1937 in pursuit of the three MTW statutory objectives:

- Reduce cost and achieve greater costs effectiveness in Federal expenditures;
- Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
- Increase housing choices for low-income families.

PHAs in the MTW Demonstration also have the flexibility to combine Federal funds from the public housing operating and modernization programs and Housing Choice Voucher program into a "block grant" to help them better meet the purposes of the demonstration and the needs of their communities.

While MTW agencies have considerable flexibility, they must still abide by all other federal rules and regulations, including the Fair Housing Act, the Civil Rights Act, labor standards, environmental rules, procurement guidelines, demolition and disposition procedures and relocation regulations. For all activities that affect their residents' rent payments, PHAs must also conduct an impact analysis that recognizes the unforeseen circumstances that may affect their residents and develop an appropriate hardship policy. These safeguards help minimize any potentially negative impact of MTW on residents and communities.

***The AAHC would like feedback from the Resident Advisory Board on the rules and regulations you would like the AAHC to consider changing that would make it easier to participate in our programs. We would like to know which program rules and regulations are the hardest to comply with.***

One of the changes we are considering is to provide a flat rent subsidy or a tiered rent subsidy to all eligible participants rather than changing the rent subsidy every time the tenant's income increases and decreases. This would eliminate or greatly reduce interim income certifications because once a tenant is eligible, the rent subsidy would either stay the same until the next annual income certification or require a significant change in income to change the rent subsidy. The AAHC believes this will streamline the process and provide greater incentive for tenants to increase their income.

The AAHC would also like to revise 3<sup>rd</sup> party verification requirements. Many third party verifications are difficult to secure, particularly from banks and higher education institutions. In addition, the AAHC is considering a change to rent reasonable and payment standard requirements due to the high cost of housing in Washtenaw County, especially in the City of Ann Arbor, Ann Arbor Township, Saline, Chelsea and parts of Pittsfield Township.

## **Section B.2 and C.1 New Activities**

The AAHC owns a single family home on Garden Circle that was acquired through HUD's Turnkey III lease to ownership program. The Turnkey III program no longer exists and the AAHC will be removing this unit through the disposition process.

## **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, 2, 3 & 5 are completed. Phase 4 has closed on financing and is under construction.*

- 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 added 23 apartments. The Phase 4 location at White/State/Henry will be adding 4 apartments and the Phase 4 location at Lower Platt will add 28 more apartments. When Miller Manor was redeveloped, 3 apartments were added for a total of 58 new 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. AAHC projects that we will convert about 200 vouchers 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. The AAHC agreed to project base 12 VASH vouchers at Hickory Way and 3 VASH vouchers at Swift Lane. These VASH voucher units are under construction and lease-up will occur in 2020. The AAHC will be issuing another Project-Based Voucher RFP in 2019 for up to 100 vouchers.*

- 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, and Washtenaw County Community Mental Health to provide 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 129 households and were awarded \$1,690,235 in annually renewable funding for 129 households in FY16. A minimum of 59 of these households will be housed at AAHC properties and Avalon, WCCMH and Ozone House will be providing on-site services. These funds have enabled Avalon to provide 24/7 services at Miller Manor.

The AAHC partnered with SOS to hire a case manager to help AAHC voucher tenants maintain their vouchers. The program received funding from Religious Action for Affordable Housing (RAAH) and Coordinated Funding to hire a full-time case manager for a 2-year PILOT program starting in 2016. Funding was renewed for 2018 & 2019 through Coordinated Funding.

During this 2018 fiscal year, SOS received 91 referrals from AAHC. Of the 91 families and/or individuals seventeen (17) were not assisted due to lack of cooperation or the families relocated to another community. Of the 80 families/individuals served seventeen (17) leased up in Ann Arbor, twenty (20) were able to resolve landlord/tenant issues such as securing funds to avoid eviction and/or assistance with securing funds for outstanding utility bills and were able to retain their housing. And the remainder were successful in their effort to lease throughout the Washtenaw community. During the 2019 fiscal year, SOS has been 100% successful in assisting with retaining the vouchers for the families/individuals referred to SOS for assistance. AAHC will continue contracting services with SOS to provide voucher families assistance in maintaining their assistance.

The AAHC partnered with Avalon Housing & Peace Neighborhood Center to provide on-site services for tenants at West Arbor.

The AAHC is partnering with Avalon and CAN to apply for funding to provide on-site services at the new White/State/Henry and Platt Road Community Centers.

#### ***Family Unification Program (FUP)***

The AAHC has partnered with the Michigan Department of Health and Human Services (MDHHS), Washtenaw County Continuum of Care (CoC), and Ozone House to provide housing assistance to 35 families for the HCV Family Unification Program.

The Family Unification Program (FUP) is a program under which Housing Choice Vouchers (HCVs) are provided to two different populations: Families for whom the lack of adequate housing is a primary factor in: the imminent placement of the family's child or children in out-of-home care, or the delay in the discharge of the child or children to the family from out-of-home care. In addition, Eligible youths who have attained at least 18 years and not more than 24 years of age and who have left foster care, or will leave foster care within 90 days, and is homeless or is at risk of becoming homeless at age 16 or older.

In addition to rental assistance, supportive services must be provided by the MDHHS to FUP youths for the entire 18 months in which the youth participates in the program; examples of the skills targeted by these services include money management skills, job preparation, educational counseling, and proper nutrition and meal preparation.

***Non-Elderly Disabled Mainstream Voucher***

The AAHC is partnering with 11 agencies to administer the NED Voucher program, all of whom serve persons with disabilities as a cornerstone of their non-profit mission or public agency purpose. NED HCVs enable non-elderly disabled families to lease affordable private housing of their choice. NED vouchers also assist persons with disabilities who often face difficulties in locating suitable and accessible housing on the private market. The target population for the NED program are any household that includes one or more non-elderly person with disabilities. The 11 partner agencies are:

- (AACIL) Ann Arbor Center for Independent Living, a non-profit service provider for persons with disabilities
- (AAHDC) Ann Arbor Housing Development Corporation, a non-profit created to provide financial support and tenant service support to the Ann Arbor Housing Commission
- Avalon Housing, a non-profit permanent supportive housing and service provider for persons who are facing homelessness, have disabilities, or have other special needs.
- (CSS) Catholic Social Services Offender Success Program, a non-profit services provider with a focus on assisting persons coming out of the prison system successfully re-enter society
- (IHN) Interfaith Hospitality Network, a non-profit shelter for families and Rapid Rehousing provider for persons who are facing homelessness, have disabilities, or have other special needs
- (MAP) Michigan Ability Partners, a non-profit permanent supportive housing and service provider for persons who are facing homelessness, have disabilities, or have other special needs
- Salvation Army, a non-profit that provides shelter for families, services for veterans, and is the local Housing Assessment and Resource Agency (HARA) for the Continuum of Care Program in Washtenaw County, which we call Housing Access of Washtenaw County (HAWC)
- (SAWC) Shelter Association of Washtenaw County, a non-profit shelter individuals for persons who are facing homelessness, have disabilities, or have other special needs
- (SOS) SOS Community Services, a non-profit shelter for families and Rapid Rehousing provider for persons who are facing homelessness, have disabilities, or have other special needs
- (WCCMH) Washtenaw County Community Mental Health in partnership with the Washtenaw County Sheriff's Department institutional settings for persons who are facing homelessness, have disabilities, or have other special needs
- (WCOCED) Washtenaw County Office of Community and Economic Development in partnership with the Washtenaw Housing Alliance who manage the Continuum of Care process

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

The Resident Advisory Board (RAB) met on February 6, 2019 to discuss proposed changes to the Administrative Plan for the Voucher Program. Members who attended the meeting were:

B. Hill, K. Wanza, F. Stephens, L. Ketzner, D. Boer, T. Franklin, R. Barker, C. Carson, K. Mozak-Betts, P. Jackson, D. Boston, S. Ellinger, K. Pitts, A. Ochoa, J. Frazier, F. Powell, J. French, S. McAfee, G. Denney, K. Bingham, O. Payne, and C. Jackson.

- 1) RAB input regarding the Moving To Work Program.** There was a lively discussion about the MTW program. The AAHC explained what the program was and asked RAB members to let us know what regulations they would change if they could? A summary of the questions, suggestions and complaints are listed below.

Multiple tenants asked about requiring program participants to participate in community service or similar programs. There was a lot of discussion around support service such as counseling and training to encourage self-sufficiency.

Another common request was to process annual reexamination on a biennial or triennial basis. Tenants commented that social security benefit income is rarely increased and when an increase occurs it's not substantial.

The RAB wanted to learn more about the Family Self-Sufficiency (FSS) and Homeownership program which the AAHC explained. One RAB member inquired about the difference between the FSS and the MTW program, and inquired if FSS would change if MTW was implemented. AAHC explained that it would be beneficial to ensure that the two programs are complimentary for participants to receive the most benefit.

The RAB had questions about work requirements. The AAHC explained that there are exceptions for households who are elderly and/or disabled.

There was a discussion about providing a basic rent subsidy, regardless of income or a gradually declining fixed rent subsidy, which was based on how long a person was in the program, not based on their income. Although some RAB members could see how this could be an incentive to work and increase their income so that they could be self-sufficient, others were afraid they would lose this rent safety net if their income declined for some reason. The AAHC explained that the MTW program requires the AAHC to adopt appropriate hardship policies.

In addition to these specific items regarding Moving the Work, the RAB members were concerned about the federal budget process and funding because there is such a high need for subsidized housing and it keeps getting cut. RAB members also stated that it was very difficult to find housing that is affordable in Ann Arbor.

**OTHER RESIDENT INPUT: NONE**

**CHALLENGED ELEMENTS TO PLAN: NONE**

**Certification by State or Local  
Official of PHA Plans Consistency  
with the Consolidated Plan or  
State Consolidated Plan  
(All PHAs)**

U. S Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 2/29/2016

**Certification by State or Local Official of PHA Plans  
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Gregory Dill, the County Administrator  
*Official's Name* *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the  
Ann Arbor Housing Commission  
*PHA Name*

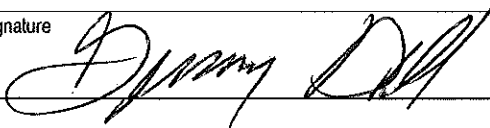
is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of  
Impediments (AI) to Fair Housing Choice of the  
Washtenaw County  
*Local Jurisdiction Name*

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State  
Consolidated Plan and the AI.

The Ann Arbor Housing Commission Plan includes plans to improve housing for low-income residents. The  
AAHC's Plan is consistent with the County's Analysis to Impediments to Fair Housing.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

|  |                               |
|--|-------------------------------|
| Name of Authorized Official<br>Gregory Dill  | Title<br>County Administrator |
| Signature<br> | Date<br>2/10/19               |



**Civil Rights Certification**  
*(Qualified PHAs)*

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB Approval No. 2577-0226  
Expires 02/29/2016

**Civil Rights Certification**

**Annual Certification and Board Resolution**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official, I approve the submission of the 5-Year PHA Plan for the PHA of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the public housing program of the agency and implementation thereof:*

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those program, addressing those impediments in a reasonable fashion in view of the resources available and working with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.

\_\_\_\_\_  
PHA Name

\_\_\_\_\_  
PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

\_\_\_\_\_  
Name of Authorized Official

\_\_\_\_\_  
Title

Signature



\_\_\_\_\_  
Date

**Certification of Compliance with  
PHA Plans and Related Regulations  
(Small PHAs)**

**U.S. Department of Housing and Urban Development**  
Office of Public and Indian Housing  
**OMB No. 2577-0226**  
**Expires 02/29/2016**

**PHA Certifications of Compliance with the PHA Plans and Related Regulations  
including Civil Rights and PHA Plan Elements that Have Changed**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the \_\_\_ 5-Year and/or \_\_\_ Annual PHA Plan for the PHA fiscal year beginning \_\_\_\_\_, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:*

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA certifies that the following policies, programs, and plan components have been revised since submission of its last Annual PHA Plan (check all policies, programs, and components that have been changed):
  - \_\_\_ 903.7a Housing Needs
  - \_\_\_ 903.7b Deconcentration and Other Policies Governing Eligibility, Selection, Occupancy, and Admissions Policies
  - \_\_\_ 903.7c Financial Resources
  - \_\_\_ 903.7d Rent Determination Policies
  - \_\_\_ 903.7h Demolition and Disposition
  - \_\_\_ 903.7k Homeownership Programs
  - \_\_\_ 903.7r Additional Information
    - \_\_\_A. Progress in meeting 5-year mission and goals
    - \_\_\_B. Criteria for substantial deviation and significant amendments
    - \_\_\_C. Other information requested by HUD
      - \_\_\_1. Resident Advisory Board consultation process
      - \_\_\_2. Membership of Resident Advisory Board
      - \_\_\_3. Resident membership on PHA governing board

The PHA provides assurance as part of this certification that:

- (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
  6. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
  7. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
  8. For a PHA Plan that includes a policy for site based waiting lists:
    - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of site-based waiting lists would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing;
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
  10. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
  11. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
  12. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
  13. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
  14. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
  15. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
  16. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
  17. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
  18. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
  19. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
  20. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
  21. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

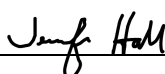
\_\_\_\_\_  
PHA Name

\_\_\_\_\_  
PHA Number/HA Code

\_\_\_\_\_ 5-Year PHA Plan for Fiscal Years 20\_\_\_\_ - 20\_\_\_\_

\_\_\_\_\_ Annual PHA Plan for Fiscal Year 20\_\_\_\_

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

|  |       |
|--|-------|
| Name of Authorized Official  | Title |
| Signature<br> | Date  |