Streamlined Annual PHA Plan	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
(High Performer PHAs)		

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

**Applicability.** The Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small 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 <u>both</u> the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) *Small PHA* A PHA that is not designated as PHAS or SEMAP troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) *Housing Choice Voucher (HCV) Only PHA* A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) *Standard PHA* A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) *Troubled PHA* A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) *Qualified PHA* A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

Α.	PHA Information.
A.1	DUA Name: Clarmont Matropolitan Housing Authority
A.1	PHA Name: Clermont Metropolitan Housing Authority
	PHA Code: <u>OH038</u>
	PHA Type:  High Performer
	PHA Plan for Fiscal Year Beginning: (MM/YYYY): 10/2024
	<b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning,
	above)
	Number of Public Housing (PH) Units <u>195</u> Number of Housing Choice Vouchers
	(HCVs) <u>993</u>
	Total Combined _1188_

	PHA Plan Submit Submission	ission Typ	e: 🛛 Annual Submissi	on Rev	ised Annua	1
	elements listed be location(s) where the public hearing Additionally, the l additional information their streaml updates, at each A PHAs are strongly	low readily the propose and propo PHA must ation of the ined submit sset Managa rencourage	a. In addition to the item y available to the public ed PHA Plan, PHA Plan sed PHA Plan are avail provide information on PHA policies containe issions. At a minimum, gement Project (AMP) and ed to post complete PHA ach resident council wi	A PHA must identify a Elements, and all interpretable for inspection by how the public may red in the standard Annual PHAs must post PHA and main office or certain and main office officies.	fy the specification retains the publication reasonably could be publicated by the publication of the specification of the specificatio	btain excluded eluding of the PHA.
	the Clermont Me Market St Batavi Easter Rd Bethel The PHA Annua www.clermontml 5/7/2024 at 10:00 held on 5/15/2024 Amelia, OH and CMHA hereby gi	etropolitan ia, OH 4510 l, OH 4510 l Plan and ha.org Th a.m. at Bo 4 at 5:00 p. on 5/16/20	opy of the 2024 Annual Housing Authority (Cl03, the office located and the Maintenance its elements are also are Resident Advisory Elethel Woods Communum. at the Monroe Woods 4 at 2:00 p.m. at the that the proposed and	CMHA) Administrate at Bethel Woods Core Shop 620 Easter Forwailable on the PHA Board (RAB) meeting ity Center. The public Child Focus Room Bethel Woods Comm	ive Office and munity Condition of the c	at 65 S enter 610 OH 45106. at eld on gs will be Ohio Pike,
	At CMHA's Adn	ninistrativ	Board of Commissioner e Office located at 65 states box if submitting a Join	rs on Monday June 2 S Market St Batavia,	24, 2024, at , OH 45103 plete table	9:00 a.m. 3. below)
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Y :	N  Statement of Housing Needs and Strategy for Addressing Housing Needs.
	Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions
	Financial Resources.
	Rent Determination.
	Homeownership Programs.
	Safety and Crime Prevention.
	X Pet Policy.
	Substantial Deviation.
	Significant Amendment/Modification

## **Local Preferences**

**Current:** CMHA will offer a preference to families that include victims of domestic violence, dating violence, sexual assault, stalking or human trafficking who have either been referred by a partnering service agency or consortia. The applicant must certify that the abuser will not reside with the applicant unless CMHA gives prior written approval. (7 Pts)

Amended: CMHA will offer a preference to families that include victims of domestic violence, dating violence, sexual assault, stalking or human trafficking who have been referred by a partnering service agency. CMHA will also accept documentation from a 3<sup>rd</sup> party professional source from whom the applicant has sought assistance relating to the domestic violence, dating violence, sexual assault, stalking or human trafficking, a completed HUD 5382, or records from law enforcement, courts, or another administrative agency. (9 Pts)

**Current:** Not currently listed in policy **Amended:** Handicapped or disabled (7 Pts)

**Current:** Elderly (1 Pt) **Amended:** Elderly (2 Pts)

#### **HOTMA Income and Assets:**

Published on February 14, 2023, The Housing Opportunity Through Modernization Act of 2016 (HOTMA) Final Income Rule updated HUD regulations for various programs specific to the criteria of reviewing the income and assets of HUD assisted families. Some updates include changes to the methods for calculating family income, revising the definition of income and adjusted income, and putting a limit on public housing tenancy. The HOTMA income and asset requirements also set a limit on the amount and type of assets that assisted families may have, revised the definition of net family assets, and required that applicants for and recipients of assistance provide authorization to PHA's to obtain financial records. This resource inventory provides guidance to both PHA's and assisted families on these changes. Currently these are set to go into effect January 1, 2025. CMHA will implement these changes as mandated by HUD.

#### **Implementation of Small Area Fair Market Rents (SAFMRs)**

Starting 1/1/2025, CMHA is required to implement the Small Area Fair Market Rents (SAFMRS) in the Housing Choice Voucher (HCV) program due to being part of the Cincinnati Metropolitan Area. SAFMRs are calculated at the zip code level rather than the local market rate.

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

<b>B.2</b>	New Activities.
	(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?
	Y N
	CMHA has applied for the Emergency Safety & Security Grant (ESSG) for grant funding to improve the lighting and security at our family and elderly sites.
	Additionally, CMHA is applying under its non-profit arm, Clermont Housing Corporation (CHC) for CDBG. The CDBG funds would be for eviction & homeless prevention.
	CMHA was awarded 2023 HOME funds to be used toward an investment into new construction project which will blend HUD-VASH PBVs, Market Rent, and Transitional Housing Units. CMHA will apply for additional HOME funds for this project in the 2024 award.
	CMHA will also seek a ROSS Grant to create a Family Self Sufficiency/and or a Homeownership Program to provide more opportunities for our families to become self-sufficient.
	CMHA will apply for Family Reunification Voucher (FUP) when the next Notice of Funding Opportunity is released.

CMHA is in the middle of a HUD approved Section 18 disposition of 20 single family public housing units. The proceeds from these sales will be used to develop new affordable housing units maximizing the PHA's current unused Faircloth space. CMHA may pursue RAD conversion efforts to convert some of the remaining public housing units or our faircloth limit though either PBV or PBRA. CMHA may also seek to pursue Streamline Voluntary Conversion (SVC) since we qualify under the Small PHA designation. CMHA received 18 Tenant Protection Vouchers.

CMHA will continue to seek partnerships for PBV opportunities by fostering partnerships with agencies and organizations with an emphasis on serving the hardest to house populations which includes families impacted by or including members of VAWA, Domestic Violence, Homeless, Disabled and Elderly.

As part of Capital Fund Projects, CMHA may submit a Development and Acquisition Plan to convert the vacant Monroe Woods Community Center (non-dwelling structure) into multiple ADA units that will be fully wheelchair accessible.

CMHA is working with the other partners in region 14 to become a checkpoint for HMIS to help improve homeless tracking within the county. CMHA will also apply for any grants offered through COHHIO for which funding is available to help expand eviction & homeless prevention in Clermont County. Additionally, CMHA is applying under its non-profit arm, Clermont Housing Corporation (CHC), for CDBG funds. These funds would be for public services which includes eviction & homeless prevention.

CMHA implemented using DocuSign for families that reached the top of the wait list who have provided email addresses to the PHA. This change has been a HUGE success in not only saving postage but speeding up service to families who may be homeless or fleeing a DV situation, while also decreasing the PHA's postage costs.

# **B.3** | Progress Report.

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.

CMHA awarded Project Based vouchers through a competitive process to Highview (which is owned by the PHA's non-profit arm, Clermont Housing Corporation). Due to OHFA's newest QAP, CMHA is also exploring low-income housing tax credits (LIHTC) to do a rehabilitation of the property.

CMHA will continue to update procedures, checklists, and documents to ensure continued compliance with HUD rules and regulations.

CMHA's website has been updated to permit ease of access for families looking to apply for our open wait lists and for participating families who are currently on our programs. (i.e. Forms, program rules, landlord lists, public records policies, our current annual plan changes, etc.)

CMHA has adhered to the preventative maintenance schedule. CMHA follows a fleet and property maintenance schedule. Management annually reviews our personnel policy which the Board approves. CMHA staff annually review our standard operating procedures. Staff are provided training to staff in areas such as VAWA, Fair Housing, Domestic Violence, Procurement, Cyber Awareness annually. Finance procedures and compliance requirements are reviewed during the annual FDS processes. Mobile work orders have been tracked and reported to the board monthly.

CMHA's resident board member was renewed in the fall of 2023.

CMHA is working on the development of the Veteran's Village which will have 28 single family cabins (a mixture of 1 & 2 bedroom units) around a community center, which will provide on-site clinical and property management services. The property will be funding through HUD-VASH vouchers for the 20 PBV units and through assistance from the VA for the 8 Transitional Units.

**B.4.** Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.

See HUD Form 50075 approved by HUD on 7/15/2022.

B.5	Most Recent Fiscal Year Audit.
	(a) Were there any findings in the most recent FY Audit?
	Y N
	(b) If yes, please describe:
	FINDING NUMBER 2022-001 FINDINGS RELATED TO THE FINANCIAL STATEMENTS REQUIRED TO BE REPORTED IN ACCORDANCE WITH GASB The Auditor of the State of Ohio indicated that CMHA's financial statement monitoring and review process lacked proper monitoring and reviewing. It bears mentioning that the AOS who completed the PHA's 2019 – 2022 FDS audits did not have any year's ending balances completed in time for the Audited FDS to be uploaded into Secure Systems until the 2022 audit which was entered a few days before it was due on June 30, 2023. A large majority of the corrections that CMHA had to enter were not because of lack of oversite of the financial records, but because of a late start and a late completion date of the AOS auditors. CMHA has complied in every way with the corrective action plan. The 2023 FDS is being completed by an IPA and is on tract to be completed ahead of the scheduled due date to HUD on June 30, 2024.
C.	Other Document and/or Certification Requirements.
<b>C.1</b>	Resident Advisory Board (RAB) Comments.
	(a) Did the RAB(s) have comments to the PHA Plan?
	Y N
	(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
<b>C.2</b>	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.

<b>C.3</b>	Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.
	Form 50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed must be submitted by the PHA as an electronic attachment to the PHA Plan.
<b>C.4</b>	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.  (a) Did the public challenge any elements of the Plan?
	If yes, include Challenged Elements.
D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	Affirmatively Furthering Fair Housing.  Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR §
	5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.
	Fair Housing Goal: Expand Outreach Efforts

## Describe fair housing strategies and actions to achieve the goal

CMHA has expanded its outreach efforts whenever our wait list opens to include the Safetynet Outreach Group, which has over 190 agencies throughout the Tri-State area. The Executive Director or a member of the management team attends the quarterly Safetynet meetings to discuss questions regarding housing. The Executive Director also attends bimonthly Priority of Housing meetings with Greater Cincinnati Behavioral Health Services (GCBHS) and attends the meetings established by Clermont County Community Services Inc (CCCSI). These two agencies are Clermont County's two HMIS. CMHA is also a founding member of the Clermont County Housing Collaborative (CCHC) which officially started in 2023 to develop a county wide plan to address the growing housing issues within Clermont County. The Executive Director or their designee attend multiple events with other organizations each month to gain exposure for our program while also learning the other programs/agencies working with the homeless population. CMHA has also continued our Landlord Incentives to owners entering their first contracts with families moving into a new unit on the HCV Program.

## Fair Housing Goal: Make Our Services More Accessible to the Public

## Describe fair housing strategies and actions to achieve the goal

CMHA has created easy-to-reach brochures for interested landlords to learn about the HCV program, streamlined our applications, placed information boards in our lobby, improved our website format to include more resources/user friendly, and continue to offer online application processes for all applicants interested in applying for our services.

CMHA is also utilizing the resources of SafetyNet to reach out to other social service agencies throughout Clermont County about any job postings, open wait lists, and any events that would better serve our families.

CMHA provides a landlord list on our website and on a landlord board which any landlord can post their property and is available to walk in traffic in our lobby.

CMHA is also forming a partnership with the University of Cincinnati – Clermont to have an intern look at sprucing up our social media page as well as our website to provide more information about what CMHA is doing in the community.

Our new project, currently dubbed the Veteran's Village, will provide 28 units for veterans and will include seven wheelchair accessible units in an area where such accessibility is difficult to find.

CMHA has also implemented using DocuSign for families who have reached the top of the wait list and have provided the PHA an email address. This change has significantly increased turnaround time for family approvals as well as decreasing mailing costs.

# **Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing PHAs**

- A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)
  - 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))

Identify specifically which plan elements listed below that have been revised by the PHA. To specify

**PHA Consortia**: Check box if submitting a Joint PHA Plan and complete the table. (<u>24 CFR</u> §943.128(a))

#### B. Plan Elements.

## **B.1 Revision of Existing PHA Plan Elements.** PHAs must:

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 and other families who are on the public housing and Section 8 tenantbased assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement

of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a).

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)

<b>Financial Resources.</b> 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)
■ <b>Rent Determination.</b> 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)
☐ <b>Homeownership Programs</b> . 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).
Safety and Crime Prevention (VAWA). A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))
Pet Policy. Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))
☐ <b>Substantial Deviation.</b> PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i)
☐ <b>Significant Amendment/Modification</b> . PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.
If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.
PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see <u>24 CFR 903.2</u> . ( <u>24 CFR §903.23(b)</u> )
<b>New Activities.</b> 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."
☐ <b>HOPE VI.</b> 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

**B.2** 

	applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD's website at:
	https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. (Notice PIH 2011-
	47)
	Mixed Finance Modernization or Development. 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: <a href="https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4">https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4</a>
	Demolition and/or Disposition. With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: <a href="http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm">http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm</a> . (24 CFR §903.7(h))
	Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: <a href="http://www.hud.gov/offices/pih/centers/sac/conversion.cfm">http://www.hud.gov/offices/pih/centers/sac/conversion.cfm</a> . (24 CFR §903.7(j))
	Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: <a href="Notice PIH 2012-32 REV-3">Notice PIH 2012-32 REV-3</a> , successor RAD Implementation Notices, and other RAD notices.
	Project-Based Vouchers. Describe any plans to use HCVs for new project-based vouchers. (24 § 983.57(b)(1)) If using project-based vouchers, provide the projected number of project-based units and general locations and describe how projecting 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 <u>24 CFR</u> §990.145(a)(1).
Safe	Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency ety 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))
- **B.4 Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR §903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."
- **B.5** Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

## C. Other Document and/or Certification Requirements

- **C.1 Resident Advisory Board (RAB) comments.** If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)
- **C.2 Certification by State of Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.
- C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed. Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through

5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. 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)).

**C.4 Challenged Elements**. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

## D. Affirmatively Furthering Fair Housing.

## **D.1** Affirmatively Furthering Fair Housing.

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

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

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

Public reporting burden for this information collection is estimated to average 7.02 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD

may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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