



# Annual Plan FY2021

The Annual PHA Plan provides 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. This document provides an overview of the changes to the Annual PHA Plan.

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<b>Annual PHA Plan</b> <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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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-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small 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 if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, 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 checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA</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) _____ Total Combined Units/Vouchers _____</p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> PHAs must have the elements listed below in sections B and C 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. 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; margin-top: 10px;"> <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> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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		PH	HCV																														
Lead PHA:																																	

<b>B.</b>	<b>Annual Plan Elements</b>
<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?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</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 checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Project-Based Vouchers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" 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>Civil Rights Certification.</b></p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p><b>Please see attachment</b></p>
<b>B.4</b>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p><b>Please see attachment</b></p>

<b>B.5</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 and Annual Plan.</p>
<b>B.6</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y   N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(c) 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>B.7</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>B.8</b>	<p><b>Troubled PHA.</b></p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y   N   N/A  <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p><b>C. Statement of Capital Improvements.</b> Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>	
<b>C.1</b>	<p><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.</p>

# Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled 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. All PHAs must complete this section.

### 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.” ([24 CFR §903.7](#))

**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. ([24 CFR §903.7\(a\)\(1\)](#)) 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. ([24 CFR §903.7\(a\)\(2\)\(ii\)](#))

**Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.** 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\(b\)](#)) 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 maintain 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\(d\)](#))

**Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. ([24 CFR §903.7\(e\)](#))

**Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. ([24 CFR §903.7\(f\)](#))

**Homeownership Programs.** A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. ([24 CFR §903.7\(k\)](#))

**Community Service and Self Sufficiency Programs.** Describe how the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. ([24 CFR §903.7\(l\)](#)) A description of: **1)** Any programs relating to services and amenities provided or offered to assisted families; and **2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS. ([24 CFR §903.7\(l\)](#))

**Safety and Crime Prevention.** Describe the PHA’s plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. ([24 CFR §903.7\(m\)](#)) 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))

**Asset Management.** State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

**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 CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan) or change in use of replacement reserve funds under the Capital Fund; 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.

**B.2 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 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. 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))

**Designated Housing for Elderly and Disabled Families.** Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: **1)** development name and number; **2)** designation type; **3)** application status; **4)** date the designation was approved, submitted, or planned for submission, and; **5)** the number of units affected. **Note:** The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

**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](#)

**Occupancy by Over-Income Families.** A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7](#). (24 CFR 960.503) (24 CFR 903.7(b))

**Occupancy by Police Officers.** The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7](#). (24 CFR 960.505) (24 CFR 903.7(b))

**Non-Smoking Policies.** The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21](#). (24 CFR §903.7(e))

**Project-Based Vouchers.** Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan. (24 CFR §903.7(b))

**Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

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

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

- B.3 Civil Rights Certification.** Form HUD-50077, *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))
- B.4 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))
- B.5 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.6 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)
- B.7 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.
- B.8 Troubled PHA.** If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

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

- C.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.

Public reporting burden for this information collection is estimated to average 9.2 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.

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## B.1 Revision of PHA Plan Elements

### Statement of Housing Needs

The Housing Authority of the City of Lumberton (HACL) is only able to address a small percentage of affordable housing through its Public Housing and Housing Choice Voucher programs for the extremely low to very low-income families in Lumberton. HACL continues to strive to provide services through its programs to address safe, decent and affordable units that are located throughout Lumberton. There is a shortage of safe, decent, and affordable housing available to special needs populations to include the elderly, persons with disabilities, and substance abuse problems, homeless individuals and families. As seen below the greatest demands for housing are one-bedroom and two-bedroom units.

HACL continues to repair and reconstruct its physical properties damaged during two separate storms, Hurricane Matthew on October 8<sup>th</sup>, 2016 and Hurricane Florence on September 14<sup>th</sup>, 2018. Prior To Hurricane the access to affordable housing in Robeson county was already limited with 53.3% of renters spending 30% or more of their income towards rent, which means that rent was unaffordable on the average. According to the US census Bureau’s Population estimates as of July 1<sup>st</sup>, 2018, 35% of the 20,840 Lumberton resident lived in poverty.

Public Housing Waiting List	Number of Families	Percentage of Families
<b>Total on Waiting List</b>	1327	100%
<b>Extremely Low Income (Less than or equal to 30% of AMI)</b>	1190	90%
<b>Very Low Income (Over 30% but less than or equal to 50% of AMI)</b>	88	7%
<b>Low Income (Over 50% but less than or equal to 80% of AMI)</b>	49	3%
<b>Families with Dependents</b>	602	45%
<b>Elderly Families</b>	99	7%
<b>Families with Disabilities</b>	240	18%
<b>White</b>	199	15%
<b>Black/African American</b>	722	54%
<b>Asian</b>	1	0%
<b>American Indian/Alaskan Native</b>	392	30%
<b>Native Hawaiian/Other Pacific Islander</b>	11	0%
<b>Hispanic/Latino</b>	0	0%
<b>0 Bedroom</b>	3	0%
<b>1 Bedroom</b>	613	46%
<b>2 Bedroom</b>	448	34%
<b>3 Bedroom</b>	205	16%
<b>4 Bedroom</b>	51	4%
<b>5 Bedroom</b>	10	0%

<b>Housing Choice Voucher Waiting List</b>	<b>Number of Families</b>	<b>Percentage of Families</b>
<b>Total on Waiting List</b>	1019	100%
<b>Extremely Low Income (Less than or equal to 30% of AMI)</b>	900	88%
<b>Very Low Income (Over 30% but less than or equal to 50% of AMI)</b>	74	7%
<b>Low Income (Over 50% but less than or equal to 80% of AMI)</b>	40	4%
<b>Families with Dependents</b>	655	64%
<b>Elderly Families</b>	140	14%
<b>Families with Disabilities</b>	8	0%
<b>White</b>	102	10%
<b>Black/African American</b>	598	59%
<b>Asian</b>	0	0%
<b>American Indian/Alaskan Native</b>	317	31%
<b>Native Hawaiian/Other Pacific Islander</b>	0	0%
<b>Hispanic/Latino</b>	2	0%

**Strategy to address the housing needs**

- Maximizing the number of affordable housing units available by employing effective maintenance and management policies to minimize the number of Public Housing units off-line
- Increase voucher utilization
- Reduce the time to renovate and lease Public Housing units
- Reduce turnover time for vacated Public Housing units
- Increase the supply of permanent affordable rental housing for the special needs populations, especially those with disabilities

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

In an ongoing effort for the HACL to meet or exceed the laws and regulations regarding its public housing programs, Chapter 4, Section III (B) Selection Method of the ACOP explains that the HACL provides for Deconcentration of poverty and encourages income mixing with a five Step plan in accordance with the Quality Housing and Work Responsibility Act of 1998.

HACL must comply with the following steps:

**Step 1.** The PHA must determine the average income of all families residing in all the PHA's covered developments. The PHA may use the median income, instead of average income, provided that the PHA includes a written explanation in its annual plan justifying the use of median income.

### **HACL Policy**

The PHA will determine the average income of all families in all covered developments on an annual basis.

**Step 2.** The PHA must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, the PHA has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

### **HACL Policy**

The HACL will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

**Step 3.** The PHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low-income family (federal poverty level or 30 percent of median income, whichever number is higher).

**Step 4.** The PHA with covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.

**Step 5.** Where the income profile for a covered development is not explained or justified in the annual plan submission, the PHA must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances the PHA's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments

- Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family in an effort to further the goals of Deconcentration
- Providing other strategies permitted by statute and determined by the PHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and PHA strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under the PHA's deconcentration policy. The PHA must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the PHA's deconcentration policy [24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, the PHA will be considered to be in compliance with the deconcentration requirement and no further action is required.

**HACL Policy**

For developments outside the EIR the PHA will take the following actions to provide for deconcentration of poverty and income mixing:

*At the beginning of each housing authority fiscal year, the housing authority will establish a goal for housing 40% of its new admissions with families whose incomes are at or below the area median income. The annual goal will be calculated by taking 40% of the total number of move-ins from the housing authority fiscal year.*

Covers Properties	Average Income	Explanation	Deconcentration Policy
Mohr Plaza	\$ 10,669.38	Excluded Elderly/Disabled	NA
Turner Terrace	\$ 7689.65	The HACL has implemented a working preference, in an effort to comply with the Deconcentration of Poverty and Income Mixing requirements	The Development is within the EIR however, the average is below the ELI
Weaver Court	\$ 8,210.32		
<b>Total</b>	\$ 26,569.35		
<b>Average Income</b>	\$ 8,856.45		
<b>Established Income Range</b>			
<b>85% of Average Property Income</b>	\$ 7,527.98		
<b>115% of Average Property Income</b>	\$ 10,184.91		
<b>30% of area Median Income</b>	\$ 26,200.00		

*As of September 18, 2019*

**Financial Resources****Sources**

Amount

**1. Federal Grants**

a. PH Operating Fund	\$ 4,862,000.00	PH Operations
b. HCV HAP Assistance	\$ 2,719,000.00	HCV Operations
Subtotal - Federal Grants	\$ 7,581,000.00	

**2. Capital Fund Grants**

a. 2017 CFP	\$ 242,000.00	PH Capital Improvements
b. 2018 CFP	\$ 1,196,000.00	PH Capital Improvements
c. 2019 CFP	\$ 1,048,400.00	PH Capital Improvements
d. 2020 CFP	\$ 1,304,800.00	PH Capital Improvements
Subtotal - CFP Grants	\$ 3,791,200.00	

**3. Public Housing Dwelling Income**

a. Tenant Rental Revenue	\$ 1,160,000.00	PH Operations
b. Excess Utility Charges	\$ 36,900.00	PH Operations
c. Investment Income	\$ 86,400.00	PH Operations
d. Non-Dwelling Income	\$ 114,000.00	PH Operations
e. Other Tenant Charges	\$ 112,000.00	PH Operations
Subtotal - Other Income	\$ 1,509,300.00	

**4. Insurance Proceeds**

a. FEMA	\$ 5,271,000.00	Hurricane Matthew repairs
b. CDGB - DR	\$ 6,959,517.00	Hurricane Matthew repairs
c. Flood/Property Insurance	\$ 364,000.00	Hurricane Florence repairs
Subtotal - Insurance {proceeds	\$ 12,594,517.00	

**TOTAL****RESOURCES**

\$ 25,476,017.00

## **Rent Determination**

HACL rent policies for the conventional public housing program (PH) are as follows:

A family's income determines eligibility for assistance and is also used to calculate the family's rent payment. HACL will use policies and methods described in Chapter of the ACOP and its HCVAP, as well as HUD regulations, to ensure that only eligible families receive assistance that no family pays more or less than obligation under regulations.

## **Public Housing Program**

Income-based rents are set at the highest of 30% of adjusted monthly income, or 10% of unadjusted monthly income. HACL will not employ any discretionary rent-setting policies for income-based rent in public housing.

Flat Rents have been established based on the operating cost of the public housing units, rental value of the units, and HACL and Quality Housing and Work Responsibility Act (QHWRA) objectives for encouraging residents to work. HACL does not currently offer ceiling rents. New Flat Rents went into effect 1 January, 2018.

HACL's minimum rent is \$50.00. HACL has adopted minimum rent hardship exemption policies contained in Chapter 6 of the ACOP.

Families paying minimum rent are required to report all income increases, including new employment, within ten (10) business days of the date the change takes effect so that HACL may recalculate rent. Interim reexaminations will only be conducted for families that qualify for the earned income disallowance (EID), and only when the EID family's rent will change as a result of the increase.

## **Housing Choice Voucher Program**

HACL is retaining the calculation of the participant's contribution at greatest of 30% of adjusted income, or 10% of monthly income.

HACL is not adding any income exclusions to the statutory requirements in the calculation of adjusted income.

HACL requires that increases in income, which occur between annual recertification's, are considered and reported within 10 days of the occurrence. HACL will verify the change, in accordance with its policies, and notify the family of the increased contract rent with a thirty-day advance notice of the change.

HACL will use the payment standard above 100% but at/or below 110% of the FMR to increase the mobility of HCB program participants. The use of higher payment standard is consistent with HACL's plan to afford participants the opportunity to relocate outside of poverty- impacted areas.

HACL has stabled a minimum total tenant payment of \$50.00.

## **Operation Management**

To fulfill its mission, HACL employs approximately 25 employees to carry out its daily activities. In addition to the Central Office (COC0.C), there are three major departments: Finance, Housing Choice Voucher Program, and Public Housing Operations. Public Housing Operations has the responsibility for ensuring that rules, standards, and policies are established for governing maintenance and management of housing owned, assisted, and operated by HACL.

To achieve its goals and objectives, HACL has transitioned to site-based management by employing skilled and semi-skilled maintenance supervisors and technicians who perform a variety of trades to ensure quality service to HACL residents.

HACL contracts with a number of vendors and contractors to perform janitorial, lawn care, pest control and other renovation to ensure prompt, effective and quality service to HACL customers.

HACL makes every effort to provide a healthy and pest-free environment for its residents. Treatments are scheduled using a rotation of pesticide applications to address cockroach infestation and other vermin such as rodents, termites, and bed bugs, which are treated effectively through a licensed contractor. A minimum of 48 hours written notice is given to the resident prior to treatment application.

The Administrative Plan describes the policies for carrying out the HCV programs in manner consistent with HUD requirements, local goals and objectives contained in the Agency Plan. The Housing Choice Voucher Program regulations specify the policy areas that must be covered in the Administrative Plan. The PHA must revise its plans when HUD amends regulations or when local circumstances require a policy change. The Housing Authority Board of Commissioners or other governing body must formally adopt the Administrative Plan and any revisions. The Administrative Plan becomes the PHA's "official" policy when it is approved by the Board of Commissioners.

## **Grievance Procedures**

Section 18 of the HACL's dwelling lease discloses the agency's Grievance Policy and Procedure for public housing residents. The grievance procedure includes the necessary standards and criteria established for HACL residents to have a fair opportunity for a hearing regarding any HACL action or failure to act involving residents' lease, rights and welfare.

## Community Service and Sufficiency Programs

HACL is developing a plan of action to meet the community service and self-sufficiency mandate. The Resident Service Coordinators will work closely with Asset Property Managers to implement various programs. The Asset Property Manager will enforce the community service mandate. The Resident Councils provide appropriate assistance as needed.

Programs have been implemented at HACL for the enhancement of resident's economic and self-sufficiency. The following programs are designed to encourage, assist, train or facilitate economic independence of assisted families, or to provide work for such families and increase resident self-responsibility.

### NAME AND DESCRIPTION OF THE PROGRAM

<b>PARTNER</b>	<b>ACTIVITY</b>
NC Cooperative Extension Service	Employment Readiness and Placement Services
Arrested Potential, Inc	After-school activities
Southeastern Family Violence Center	Counseling/Intervention Services
Southeastern Community & Family Services	Community Service Opportunists
Robeson County Health Department	Making Proud Choices
University of North Carolina at Pembroke	Healthy Start Corps.
Goodwill Community Foundation	GCF School Supply Initiative

HACL's current community service program allows full compliance with HUD requirements of eight (8) hours per month for community service, self-sufficiency activities, or a combination of both.

Residents, who qualify for the exemption status, must complete a community service exception form and will be provided with detailed information regarding what documents are necessary for certification, as well as cut-off dates for compliance. Any change in resident exemption status must be reported immediately to HACL for proper follow-up and the recertification/verification process.

Resident Service Coordinators and Asset property Manager Staff will monitor residents required to participate in the program.

If the Asset property Manager determines that the community Service requirement has not been met, the resident will be given the opportunity to cure the noncompliance.



## **Safety and Crime Prevention**

Public Housing sites are vulnerable to both violent and non-violent crimes. Residents are often preyed upon by criminals as they see our residents, whom are often low-income, disadvantaged households, as easy targets. Senior citizens are especially vulnerable to craft cons and petty theft. The HACL must put in place measures to address these issues.

In October 2018, the HACL reestablished the Safety/Security/Resident Services department within Public Housing. The purpose of this department is to not only foster relationships with both our tenants and the local law enforcement, but to provide a bridge for the gap to reduce. The HACL has a strong connection with the City of Lumberton Police Department (LPD), the Robeson County Sheriff's Department (RCSD), and other law enforcement agencies. We receive weekly, monthly stats from LPD, which helps HACL gauge where, what and when crimes are committed on our properties and calls for services.

The HACL is actively involved in the following initiatives:

- LPD currently has a Special Operations Unit that is designated for the police oversight for the HACL.
- National Night Out
- Neighborhood Watch
- Security contract maintained to secure Mohr Plaza; our disabled/elderly designated five- story complex.
- Safety/Security/Resident Services Department meets weekly with the LPD
- Improved outdoor lighting by converting to LEDs.

## **Pet Policy**

Chapter 10 of the HACL ACOP addresses the policies on pet ownership in designated communities. The rules adopted are reasonably related to the legitimate interest of the HACL to provide decent, safe and sanitary living conditions for all residents and to protect and preserve the physical condition of the property, as well as the financial interest of the HACL. This policy explains the exemption of service animals, which are allowed to reside in public housing communities with applicable restrictions waived.

All pets are to be inoculated and licensed in accordance with state and local laws. The resident must provide annual update to pet certification and inoculations, as well as information on spaying and neutering.

The ACOP has been updated to ensure that the City of Lumberton's ordinance on what is considered to be "dangerous breeds of dogs" and the registration process that must be followed.

## **Asset Management**

Full asset management practices have been the focus of the HACL Board of Commissioners. Once fully addressed and corrective action implemented, the HACL may solicit the services of a consultant to evaluate and propose a repositioning plan for long-term operating, capital investment, rehabilitation, possible disposition, and any other needs for the public housing inventory of 729 units

## B.2 New Activities

### Demolition and/or Disposition

The effects of Hurricanes Matthew and Florence are well documented. Since October 2016 the HACL has been unable to provide housing in three locations, Hilton Heights (42 units), Myers Park (30 units), and Lumbee Homes (68 of 93 units). At this moment, the HACL is looking at options of the "future" of the aforementioned units due to the a) cost of rebuilding at current values, and b) the elevation in each location is either below flood elevation or is affected by the levee.

**Myers Park (30 Units)** - 15 duplex buildings housing 25 2BR and five 3BR units, and a community center. The community was 100% flooded in both Hurricanes Matthew and Florence. The location sits 2" below the base flood elevation and, in accordance with the City of Lumberton, the rebuild on that site would require that the base elevation be at two-feet, thus causing a rise of two-feet, two-inches to rebuild all of the units at the same location. The HACL is actively searching for land to purchase to rebuild these 30 units outside of the flood zone. With regards to the existing structures the HACL is developing courses of action that address demolition and/or disposal of the units.

**Hilton Heights (42 Units)** - 13 multi-unit buildings housing 26 3BR, 12 4BR, and four 5BR units, and a community center that also housed the main office and maintenance complex of the HACL. The community was 100% flooded in Hurricanes Matthew. The location sits two-feet below the base flood elevation and, in accordance with the City of Lumberton, the rebuild on that site would require that the base elevation be at two-feet, thus causing an average rise of four-six feet to rebuild all of the units and the community center at the same location. The HACL is actively searching for land to purchase to rebuild these 42 units outside of the flood zone. With regards to the existing structures the HACL is developing courses of action that address demolition and/or disposal of the units.

**Lumbee Homes (68 of 93 Units Affected)** - 48 multi-unit buildings. Community was only partially flooded during Hurricane Matthew thus the demolition/disposition. The affected units are stretched along multiple buildings housing 14 1BR, 29 2BR, 18 3BR, and seven 4BR units, and a community center. The HACL is actively searching for land to purchase to rebuild the 68 units affected or possibly rebuild all 93 units outside of the flood zone. With regards to the existing structures the HACL is developing courses of action that address demolition and/or disposal of the units.

### Units with Approved Vacancies for Modernization

As of September 27, 2019, the HACL has 171 units that were damaged by Hurricane Matthew and/or Hurricane Florence. Approximately \$7 million is available to repair the damaged units. These units reside in Weaver Court, Turner Terrace, Myers Park, Hilton Heights, and Meadows.

## **B.4 Most Recent Fiscal Year Audit**

### **Fiscal Year 2019**

HACL is required to have an annual audit conducted under Section 5(h)(2) of the U. S. Housing Act of 1937 (42 USC 1437c(h)). The most recently completed annual audit was for the fiscal year ended March 31, 2019 (FY 2019) and was submitted to HUD. There were Thirteen findings noted as a result of that audit, covering several program areas. The findings include issues identified with not following proper budget procedures; inadequate and/or proper signatures were not obtained; Incorrect procedures were followed in regards to calculating income; and incorrect procedures were followed in regards to tenant leasing process. HACL staff is in the process of implementing corrective actions to the extent possible to address all of these findings.

## **B.5 Progress Report**

The HACL continues striving to meet its goals and objectives. Currently, the main priority of the HACL is to rebuild the 171 units that were by Hurricane Mathew.

## **B.6 Resident Advisory Board Comments**

There were no comments from the Resident Advisory Board.