

Annual PHA Plan <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: 03/31/2024
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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, 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-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 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, 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.

A.	PHA Information.
A.1	PHA Name: <u>Hawaii Public Housing Authority</u> PHA Code: <u>HI001</u> PHA Type: ☒ Standard PHA ☐ Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2022</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>5,406</u> Number of Housing Choice Vouchers (HCVs) <u>4,201</u> Total Combined Units/Vouchers <u>9,335</u> PHA Plan Submission Type: ☒ Annual Submission ☐ Revised Annual Submission Availability of Information. 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. 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. The PHA Plan and all supporting documents are available on the internet: http://www.hpha.hawaii.gov/housingplans/index.htm Hard copies of the plan are available at the following locations: Hawaii Public Housing Authority 1002 North School Street, Bldg. E Honolulu, Hawaii 96817 Lanakila Homes 600 Wailoa Street Hilo, Hawaii 96720 Kapaa 4726 Malu Road Kapaa, Hawaii 96746 Ka Hale Kahaluu 78-6725 Makolea Street Kailua-Kona, Hawaii 96740 Kahekili Terrace 2015 Holowai Place Wailuku, Hawaii 96793

☐ PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)					
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:					

B. Plan Elements

B.1 Revision of Existing PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA?

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.
- ☒ ☐ Operation and Management.
- ☐ ☒ Grievance Procedures.
- ☐ ☒ Homeownership Programs.
- ☐ ☒ Community Service and Self-Sufficiency Programs.
- ☐ ☒ Safety and Crime Prevention.
- ☐ ☒ Pet Policy.
- ☐ ☒ Asset Management.
- ☐ ☒ Substantial Deviation.
- ☒ ☐ Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

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

Housing Needs: Housing Needs of Families on the Public Housing Waiting List as of July 1, 2021

Total Families on Waiting List = 1,860	# of families	% of total families
Income Levels		
Extremely low income <=30% AMI	1,719	92.42%
Very low income (>30% but <=50% AMI)	119	6.40%
Low income (>50% but <80% AMI)	13	0.70%
Families with children	412	22.15%
Elderly families	566	30.43%
Families with Disabilities	542	29.14%
Racial Distribution		
Asian/Pacific Islander/Other	1,500	80.65%
White	574	30.86%
Hispanic	239	12.85%

Black	82	4.41%
American Indian, etc.	73	3.92%
Bedrooms Needed		
1BR and Studio	1,291	69.41%
2 BR	314	16.88%
3 BR	147	7.90%
4 BR	119	6.40%
5 BR	10	0.54%

Housing Needs of Families on the Section 8 Waiting List as of July 1, 2021

Total Families on Waiting List = 2,372	# of families	% of total families
Income Levels		
Extremely low income <=30% AMI	2,204	94.10%
Very low income (>30% but <=50% AMI)	148	5.56%
Low income (>50% but <80% AMI)	15	0.24%
Families with children	849	36.31%
Elderly families	336	14.41%
Families with Disabilities	887	35.73%
Racial Distribution		
Asian/Pacific Islander/Other	1,833	82.47%
White	508	17.55%
Hispanic	294	14.23%
Black	261	10.87%
American Indian, etc.	46	2.01%
Bedrooms Needed		
1BR and Studio	1,484	83.84%
2 BR	747	15.01%
3 BR	70	2.54%
4 BR	55	0.93%
5 BR	22	0.26%
5+ BR	1	0.02%

Housing Market Area

The Hawaii Housing Market Area (HMA) is defined as the State of Hawaii which is comprised of the City & County of Honolulu and Counties of Hawai'i, Kaua'i, and Maui.

The following housing market analysis is based primarily on information from the following sources: 2019 Hawaii Housing Planning Study, Hawaii State Department of Business, Economic Development and Tourism (DBEDT), "4th Quarter 2019 Report" and U.S. Census.

The 2019 Hawaii Housing Planning Study:**Current Housing Situation in Hawai'i – Current Housing Stock**

According to the Census, there were 535,543 housing units in Hawaii in 2017, up about 2.0 percent from 524,852 units in 2014.

Total Housing Units (Table 1) are units that are available for occupancy as residential owned or long-term rental accommodations. The definition excludes group quarters (prisons, dormitories, nursing homes, shelters, etc.) and commercial residential properties (hotels, condominium hotels, hostels, timeshare units, etc.), which are available only on a short-term rental basis.

Total housing units are further defined as either occupied or vacant. By Census convention, the number of occupied housing units is always equal to the number of households in the State. The total housing stock includes all occupied housing units plus vacant housing units available to the market (Table 1).

Residential housing construction fell after the Great Recession began in Hawaii in 2008. Total housing units grew by about 5,600 units per year (2.2%) between 2009 and 2011. Between 2011 and 2014, growth slowed to 2,800 units per year – half what it was in the previous five years. Between 2014 and 2017, growth slowed further to about 2,675 units per year.

Table 1. Housing Unit Types by County, 2017

Housing Unit Types	Honolulu	Hawai'i	Maui	Kaua'i	State
Total Housing Units	346,374	84,750	71,467	30,289	532,880
Occupied Housing Units	311,451	67,054	54,381	22,563	455,449
Vacant Housing Units	34,923	19,956	17,712	7,670	45,373
Vacant and Available	11,214	5,994	6,700	2,488	26,396
Vacant and Unavailable	23,709	13,962	9,242	5,732	52,645
Vacant for agricultural use	61	38	5	32	136
Vacant for seasonal use	14,358	9,708	6,937	4,301	35,304
Other Vacant	9,290	4,216	2,300	1,399	17,205
Housing Stock	322,665	73,048	61,081	25,051	481,845
Pct. available (occupied & vacant)	93.2%	86.2%	85.5%	82.8%	90.4%
Percent unavailable units	6.8%	16.5%	12.9%	18.9%	9.9%
Percent vacant for seasonal units	4.2%	11.5%	9.7%	14.2%	6.6%
Percent other vacant	2.7%	5.0%	3.2%	4.6%	3.2%

Source: ACS 2017 5-yr Estimates, Table B25004 and DP04.

Housing Stock Size

Among the 535,543 housing units in Hawai'i in 2017, 482,864 housing units were available to the resident housing market (Table 2). We refer to this number as the housing stock. Within the housing stock, 455,502 were occupied units and 27,362 were available vacant units.

About 52,679 housing units (9.8%) were not part of the housing stock in 2017. Of those, over 67 percent were vacant for seasonal, recreational, or occasional use. A small number of units (138) were vacant and held off the market for use by migrant agricultural workers.

Units that were vacant for seasonal, recreational, or occasional use (seasonal) are the most significant component of Hawai'i's unavailable housing units. There were 35,324 of them in 2017, up 6.9 percent from 2014. That was 44.1 percent of vacant housing units and 6.6 percent of all housing units in the State.

There were 17,217 housing units classified as "other vacant." The definition includes housing units that are held off the market while a decision is made regarding their status. Types of decisions include litigation, settling estates, involvement in other legal proceedings, units held while they are being refurbished or rebuilt, or while owners are deciding what to do with their vacant property. In 2017, Hawai'i's other vacant units made up one-third of vacant and unavailable units and 3.2 percent of total housing units.

Hawai'i has typically been in the top 15 percent of states losing housing units to vacancies. We ranked 12th for percent of total housing units held for seasonal, recreational, and occasional use in 2017. Only two states ranked higher than the counties of Hawai'i, Kaua'i, and Maui with respect to the percent of total units held off the market for seasonal use.

Across the State, there were differences in the percent of total housing units counted as housing stock. In Honolulu, 6.8 percent of all units were unavailable. In the other counties, that figure was significantly higher as in 19 percent for Kaua'i County, 16 percent in the County of Hawai'i, and 13 percent for Maui County.

Table 2. State of Hawai'i, Changes in Housing Stock, 2014-2017

	2014		2017		Change 2014-2017	
	Number	Percent	Number	Percent	Number	Percent
Total Housing Units	524,852	100.0%	532,880	100.0%	8,028	1.5%
Single Family	282,060	53.7%	286,873	53.8%	4,813	1.7%
Multi-Family	242,792	46.3%	246,007	46.2%	3,215	1.3%
Total Available Housing Stock	477,520	91.0%	482,803	90.6%	5,283	1.1%
Total Occupied Housing Units	450,299	85.8%	455,449	85.5%	5,150	1.1%
Owner Occupied Units	257,121	49.0%	264,622	49.7%	7,501	2.9%
Renter Occupied Units	193,178	36.8%	190,827	35.8%	-2,351	-1.2%
Total Vacant Units	74,553	14.2%	79,999	15.0%	5,446	7.3%
Vacant Available	27,221	5.2%	27,354	5.1%	133	0.5%
For Rent	18,704	3.6%	20,026	3.8%	1,322	7.1%
Rented, not occupied	2,418	0.5%	2,134	0.4%	-284	-11.7%
For Sale only	4,085	0.8%	3,193	0.6%	-892	-21.8%
Sold, not occupied	2,014	0.4%	2,001	0.4%	-13	-0.6%
Vacant Unavailable	47,332	9.0%	52,645	9.9%	5,313	11.2%
Seasonal Use	33,054	6.3%	35,304	6.6%	2,250	6.8%
For Migrant Workers / Ag. Use	93	0.0%	136	0.0%	43	46.2%
Other Vacant	14,185	2.7%	17,205	3.2%	3,020	21.3%

Source: ACS 2014 and 2017 5-yr. Estimates, Tables B25004, S2504, and S1101.

Total New Units Needed – HUD Income Classification:

Tables 32 and 33 reflect the demand for housing units by county, tenure and unit type for the next five years. They have been estimated for each of eight market levels following U.S. Department of Housing and Urban Development (HUD) income guidelines.

The distribution of needed units by tenure, type, and market-level was developed from Housing Demand Survey data. The analysis employs the assumption that needed units are distributed according to the effective demand estimates from the survey. It also excludes households deemed highly qualified to purchase or rent their next home, as these units will likely be developed by the private sector. The detail produced in this analysis will be useful in a variety of housing planning efforts in the next five years. It is relevant, reliable, and utilitarian.

Effective demand includes only Hawai'i residents who are planning to move to a unit in the State of Hawai'i in the next five years. The analysis for Tables 32 and 33 did not account for people who are currently doubled-up for economic reasons.

The lion's share of the needed units is concentrated at the lowest HUD income levels. This finding suggests that the market is more effective in producing high-end units than low-end units. Inefficiencies are exacerbated in periods of rapid market expansion when fewer low-end units are built. More middle-market and low-end units are built during periods of market adjustment.

Needed units are also concentrated in the rental market rather than the ownership market. Again, the current housing market produces units for sale more efficiently than units for rent.

The estimates in the two tables above reflect the preferences of Hawai'i's likely movers, but do not account for their willingness to accept alternatives or their financial qualifications to make their preferred move. As was noted in the prior section on qualified demand, not every household is financially prepared to pursue their preferred housing situation.

A portion of demand survey respondents who indicated their preference to purchase their next residence conceded that they might have to rent instead. Similarly, several households that intend to buy a single-family home when they move noted that they would consider buying a multi-family dwelling if they could not find a single-family unit they could afford. Finally, a percentage of the survey respondents who indicated that they would be purchasing their next unit also reported that their current financial situation was incompatible with that goal (currently living in public housing, receiving Section 8 assistance, or with no money for a down payment).

The report did not explicitly include nearly 60,000 respondent households that were doubled up. Many of those households were, however, included because one or both families in the households were unqualified to buy or rent another unit on their own.

Housing units needed to accommodate homeless persons re-entering the housing market were included in Tables 32 or 33. Households entering the affordable housing market from Special Needs housing have not been included in those tables. Most are in group quarters (prisons, dormitories, nursing homes, etc.) but some are located outside the market (homeless persons, for example) and some, like youths exiting foster care, are living with their foster families in occupied housing units. The data on this group, along with the process by which they enter the marketplace, are not yet clear enough to speculate on the number of units they might require in any given year. It is certain, however that including them would increase the number of needed units in Table 32 and 33.

Applying any one of these possible adjustments to the needed units' tables will result in a shift in the total number and type of housing units needed to accommodate Hawai'i's residents by 2025.

Table 32. Needed Housing Units by HUD Income Classification, Counties & State of Hawai'i, 2020-2025

		Total Units Needed, 2020 through 2025								
		HUD Income Classification								Total
		LT 30	30 to 50	50 to 60	60 to 80	80 to 120	120 to 140	140 to 180	180+	
State of Hawaii		10,457	5,730	3,141	6,910	6,055	4,011	5,854	7,997	50,156
	Ownership Units	2,135	1,158	1,352	3,755	3,320	2,156	3,982	5,734	23,590
	Single-Family	1,719	764	805	2,981	1,866	1,470	2,623	4,593	16,822
	Multi-Family	415	393	547	773	1,454	685	1,359	1,141	6,768
	Rental Units	8,322	4,573	1,789	3,155	2,735	1,855	1,872	2,263	26,566
	Single-Family	3,257	1,871	471	1,724	986	1,047	851	1,149	11,355
	Multi-Family	5,065	2,702	1,319	1,432	1,749	808	1,022	1,114	15,211
Honolulu		4,200	2,923	1,979	2,944	3,037	1,710	2,405	2,970	22,168
	Ownership Units	543	520	860	1,772	1,553	1,198	1,622	2,243	10,311
	Single-Family	392	190	412	1,271	628	675	866	1,484	5,918
	Multi-Family	151	329	448	501	925	523	756	759	4,393
	Rental Units	3,657	2,403	1,119	1,172	1,484	512	783	727	11,857
	Single-Family	1,070	682	165	513	271	99	156	292	3,249
	Multi-Family	2,587	1,721	954	658	1,213	413	627	435	8,608
Maui		1,721	777	492	1,272	740	647	1,800	2,955	10,404
	Ownership Units	351	253	126	464	211	257	1,104	1,839	4,605
	Single-Family	351	230	33	365	157	258	881	1,620	3,894
	Multi-Family	0	23	93	99	55	-1	222	219	711
	Rental Units	1,370	524	366	808	528	390	696	1,116	5,799
	Single-Family	594	418	132	393	333	284	377	561	3,092
	Multi-Family	776	106	234	415	195	105	319	555	2,706
Hawaii		3,475	1,356	373	2,285	2,143	1,163	1,198	1,309	13,303
	Ownership Units	756	285	196	1,413	1,556	561	924	1,012	6,703
	Single-Family	687	264	196	1,249	1,081	398	635	911	5,420
	Multi-Family	69	21	0	164	474	164	289	102	1,283
	Rental Units	2,719	1,071	178	872	587	601	274	297	6,600
	Single-Family	1,225	443	49	514	307	384	251	215	3,389
	Multi-Family	1,494	628	129	358	280	217	24	82	3,211
Kauai		1,060	674	297	408	136	492	451	763	4,281
	Ownership Units	484	100	170	105	0	139	333	640	1,971
	Single-Family	289	80	164	97	0	140	242	579	1,590
	Multi-Family	195	20	6	8	0	0	91	62	381
	Rental Units	576	574	127	304	136	352	119	123	2,310
	Single-Family	367	328	124	303	75	279	67	81	1,625
	Multi-Family	208	246	3	1	61	73	51	42	685

Source: Housing Demand Survey and Hawai'i Housing Model, 2019. Housing units needed to eliminate pent-up demand and accommodate new household formation between 2020 and 2025 for the State of Hawai'i and its counties by preferred tenancy and unit type.

Total New Units Needed Continued:

Table 33. Needed Housing Units by Income Classification, Counties and State of Hawai'i, 2020-2025

	Total Units Needed, 2020 through 2025							
	Income Classification							Total
	Less than \$30k	\$30k to \$45k	\$45k to \$60k	\$60k to \$75k	\$75k to \$100k	\$100k to \$150k	More than \$150k	
State of Hawaii	11,289	5,595	6,009	6,106	6,610	8,303	6,244	50,156
Ownership Units	2,376	1,321	2,732	2,922	4,227	5,529	4,484	23,590
Single-Family	1,832	897	1,927	1,952	2,915	3,859	3,439	16,822
Multi-Family	544	424	805	970	1,312	1,670	1,045	6,768
Rental Units	8,913	4,274	3,277	3,184	2,383	2,774	1,761	26,566
Single-Family	4,246	1,771	1,433	2,040	569	816	480	11,355
Multi-Family	4,667	2,503	1,845	1,144	1,814	1,958	1,281	15,211
Honolulu	3,979	2,539	2,241	2,368	3,439	4,077	3,526	22,168
Ownership Units	515	370	778	1,197	2,174	2,731	2,545	10,311
Single-Family	363	119	356	605	1,273	1,463	1,740	5,918
Multi-Family	152	251	423	592	901	1,268	805	4,393
Rental Units	3,464	2,168	1,462	1,171	1,265	1,346	980	11,857
Single-Family	1,284	347	489	425	378	178	148	3,249
Multi-Family	2,180	1,821	974	746	887	1,169	832	8,608
Maui	2,039	1,174	1,279	1,143	1,734	1,822	1,213	10,404
Ownership Units	460	316	376	490	929	1,224	810	4,605
Single-Family	407	205	282	391	849	1,023	736	3,894
Multi-Family	52	111	94	98	81	201	74	711
Rental Units	1,579	858	903	653	804	598	403	5,799
Single-Family	915	633	451	509	161	255	169	3,092
Multi-Family	664	225	452	145	643	343	234	2,706
Hawaii	3,904	1,497	2,285	1,982	943	1,774	918	13,303
Ownership Units	887	509	1,461	1,209	774	1,129	734	6,703
Single-Family	761	475	1,188	932	472	993	600	5,420
Multi-Family	126	34	273	277	302	136	134	1,283
Rental Units	3,017	988	825	773	169	645	184	6,600
Single-Family	1,555	581	409	377	30	384	54	3,389
Multi-Family	1,462	407	415	396	139	261	130	3,211
Kauai	1,367	385	204	613	494	630	588	4,281
Ownership Units	514	125	117	27	349	445	394	1,971
Single-Family	301	98	102	24	322	381	363	1,590
Multi-Family	213	27	15	2	28	65	31	381
Rental Units	852	260	87	587	145	185	194	2,310
Single-Family	492	210	84	730	0	0	109	1,625
Multi-Family	360	50	4	-143	145	185	85	685

Source: Housing Demand Survey and Hawai'i Housing Model, 2019. Housing units needed to eliminate pent-up demand and accommodate new household formation between 2020 and 2025 for the State of Hawai'i and its four counties, by preferred tenancy and unit type.

Total New Units Needed – Elderly Housing

Analysis was also conducted to identify the subset of total needed units that would be required to accommodate elderly households, that is, households with one or more persons 60 years of age or older, no children under the age of 18, and no persons other than immediate family. Of the 50,156 units needed for households between 2020 and 2025, 13 percent were for elderly households statewide (6,714 units; Table 34). This is up from 9 percent in 2016. All other needed units referenced here as “family units”, would be for the use of all other types of households.

Considering just the units needed for elderly households, about 29 percent (1,967 units) are needed for low- and moderate-income households (80% AMI or less). The demand for single-family versus multi-family units was almost evenly distributed among elderly households. Of the 6,714 needed elderly units, there was demand for 3,129 (47%) single-family dwellings.

Table 34. Needed Housing Units by HUD Income Classification, Elderly Persons, Counties and State of Hawai'i, 2020-2025

		Total Units Needed, 2020 through 2025								
		HUD Income Classification								Total
		LT 30	30 to 50	50 to 60	60 to 80	80 to 120	120 to 140	140 to 180	180+	
State of Hawaii		400	751	113	704	1,273	678	901	1,894	6,714
Ownership Units		358	190	64	400	772	349	653	1,723	4,509
	Single-Family	282	0	14	354	363	152	423	1,229	2,818
	Multi-Family	78	190	50	52	412	177	229	503	1,691
Rental Units		23	542	39	308	506	354	250	183	2,205
	Single-Family	0	0	0	39	44	100	96	32	312
	Multi-Family	23	542	39	269	462	253	154	151	1,894
Honolulu		288	714	72	538	1,159	436	486	1,330	5,022
Ownership Units		288	185	50	273	703	193	331	1,237	3,261
	Single-Family	211	0	0	223	291	96	198	764	1,783
	Multi-Family	78	185	50	50	412	97	133	473	1,478
Rental Units		0	529	22	265	456	243	154	93	1,762
	Single-Family	0	0	0	0	0	0	0	0	0
	Multi-Family	0	529	22	265	456	243	154	93	1,762
Maui		62	6	16	21	26	75	208	275	689
Ownership Units		43	0	0	16	10	29	197	233	528
	Single-Family	43	0	0	16	10	29	146	203	447
	Multi-Family	0	0	0	0	0	0	51	30	81
Rental Units		13	4	11	4	25	58	16	30	162
	Single-Family	0	0	0	0	25	47	16	0	89
	Multi-Family	13	4	11	4	0	10	0	30	73
Hawaii		49	22	15	132	88	167	160	155	787
Ownership Units		27	0	0	109	59	127	99	155	576
	Single-Family	29	0	0	116	62	27	79	164	476
	Multi-Family	0	0	0	0	0	81	20	0	100
Rental Units		9	9	6	29	25	53	80	0	211
	Single-Family	0	0	0	29	19	53	80	0	180
	Multi-Family	9	9	6	0	6	0	0	0	31
Kauai		0	9	11	13	0	0	48	134	215
Ownership Units		0	5	14	2	0	0	26	98	144
	Single-Family	0	0	14	0	0	0	0	98	112
	Multi-Family	0	5	0	2	0	0	26	0	32
Rental Units		0	0	0	10	0	0	0	60	70
	Single-Family	0	0	0	10	0	0	0	32	42
	Multi-Family	0	0	0	0	0	0	0	28	28

Source: Housing Demand Survey and Hawai'i Housing Model, 2019.

Housing Demand:

Housing demand is impacted by population growth, high cost of housing, the military presence, domestic migration and immigration, and foreign investment in Hawai'i real estate. Since the release of the 2015 housing demand study, population growth has slowed. The new long-range population projection released in June 2018, updates the historical population and economic trend up to 2016. The new release revised the long-term population projection downward for all the years up to 2040 and added the projection for 2045. Furthermore, according to the estimates by the U.S. Census Bureau, Hawaii lost resident population two years in a row in 2017 and 2018, for the first time since statehood.

The forecast yielded a total resident population of 1,455,686 by 2030 under the assumption that future population growth will start a new trend which is influenced by the 2017-2018 population decline (Low Scenario). Under this scenario, population growth will be at an annual rate of 0.25 percent. Under the assumption that population will continue to grow at the pre-2017 trend starting in 2019 (High Scenario), total population is projected to be 1,556,843 by 2030. This represents an annual average growth rate of 0.6 percent.

The difference between 2020 and 2030 are the additional units demanded (consumers want them and able to afford either for rent or purchase). The average annual growth of the housing units between 2020 and 2030 is projected to be 0.6 percent.

Vacancy for other units will be heavier on the neighbor island counties. This is consistent with the home sales experienced during the last 10 years. Of the total residential homes sold between January 2008 and September 2019, 44.5 percent of the homes sold on the neighbor island counties were to out-of-state residents: 42.2 percent of homes sold in Hawaii County were to out-of-state residents, 48.0 percent in Maui County, and 42.9 percent in Kauai County. In contrast, only 14.7 percent of the home sold on Oahu were to nonresidents during the same period. Many of the homes owned by non-residents were left vacant for most of the year, with the owner only staying during the holidays.

Honolulu County will need as many as 21,392 units in the next 10 years if population growth follows the pre-2016 trend. If population growth slows down to 0.25 percent per year, then the demand for housing would be 10,402 units for the next 10 years. In the average of the two scenarios, 15,897 units will be needed over the next 10 years, accounting for 44.0 percent of the total state demand.

On average, Hawaii County will need about 10,672 units for the next 10 years, accounting for 29.5 percent of the state total. Maui County will need an average of 7,000 units, accounting for 19.5 percent of the state total. Kauai will need about 2,500 units between 2020-2030, accounting for 7.0 percent of the state total demand.

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

The HPHA is proposing the following amendments/revisions/updates under the Housing Choice Voucher and Public Housing programs in order to prevent circumventing the waiting lists and promote efficiency:

- Adopt a policy that sets a date of the end of the participant's annual reexamination (AR) month in which allowable deductions may be considered for the annual reexam. All additional deduction information provided following the end of the participant's AR month will be applied as an interim reexam.
- Update policy on additions to the household after admission into the Housing Choice Voucher program to allow additions of more than one family member as a spouse, significant other, partner and minors through birth, adoption, court awarded custody, or hanai. (982.402, 982.401(d), 982.4. [24 CFR 982.551(h)(2)])
- Adopt policy on changes to household composition when a family member who is 18 and over remove themselves from the household; and to establish the following policies when such family members seek readmission to the household: [24 CFR 982.551(h)(2)]
 - A. They are prohibited from readmission to the household.
 - B. They are required to apply as new applicants for placement on the waitlist.
 - C. The HPHA may consider medical hardship or other extenuating circumstances, and if determined necessary as a reasonable accommodation, may allow such family members to be added to the household as a live-in-aide only.

- Update policy regarding the designation of the head of household, spouse, and co-head of the family in the event of marriage of the head or co-head individuals who may not be related by blood, marriage, adoption, or other operation of law, subsequent to admission to the program, to clarify as follows: [HUD 50058 Instruction Booklet]
 - A. If the head marries, the head's spouse automatically replaces the original co-head as the spouse. The original co-head automatically becomes an authorized family member.
 - B. If the co-head marries, as a family can only have a spouse or co-head, but not both, the family determines whether the co-head's spouse will become the head of household, or an authorized household member.
- Adopt revisions to the Housing Choice Voucher policy and Hawaii Administrative Rules to shorten the length of time the entire family can be absent from the subsidized unit from 180 days to 60 days, allowing for specific exceptions as allowed under the CFR. [24 CFR 982.312] Adopt a policy which allows for a tenant with a live-in aide who is lawfully present or admitted to the United States to receive subsidy for an additional bedroom in the Housing Choice Voucher program, or to occupy a unit in the public housing program. [24 CFR Section 982.402(a), 24 CFR Section 982.402(b)(8), § 982.402(b)(6), 24 CFR Section 5.403, 24 CFR Section 982.316]
- Adopt policy to include special unit types including single room occupancy to expand lease up options for voucher holders and ensure that the program is readily accessible to and usable by persons with disabilities in accordance with 24 CFR part 8. [24 CFR 982.601.b]
- Adopt a policy to pay landlords via electronic deposit into their account.
- Adopt a policy that does not allow the owner to keep the housing assistance payment for the remainder of the month when the family moves out of the unit. Housing assistance payments end the date HPHA determines the family has vacated the unit. Amounts overpaid to the owner must be returned to HPHA. [HUD HCV Guidebook 22-13, 24 CFR 792.103 and 982.311 Housing Assistance Payment 10-6]
- Amend policy to state that when a family is requesting to downsize, the voucher size will be changed at the end of the lease term.
- Update HPHA's Administrative Rules and Administrative Plan with policies regarding VASH vouchers, including conversion of a VASH voucher to a Section 8 Housing Choice Voucher when the qualifying veteran or veteran's no longer needs the VASH voucher or qualifies for the VASH voucher. [24 CFR 982]
- Update policy for repayment agreements to terminated families who fail to make 2 consecutive payments from 3 notices in 12 months. [24 CFR 982.551 and 552]
- Adopt Administrative Rules to implement Hawaii Revised Statutes §356D-13.5 regarding remaining members of assisted family to allow only the original household members at the time of voucher issuance to retain the voucher where other members of the family have left the unit; and to provide for the automatic return of the voucher to the HPHA once all original household members are no longer in the household; and to provide an exception for families where the original parents in the household are survived by minors who were subsequently added to the household, until the youngest minor reaches the age of 21 years, or reaches the age of 23 if the youngest minor is a full-time student at a business school, technical school, college, community college, or university.
- Adopt Administrative Rules to allow the HPHA to implement a lottery system to:
 - A. Randomly choose families (excluding the elderly, disabled, victims of domestic violence and VASH) to terminate from the Housing Choice Voucher Program if the HPHA must terminate Housing Assistance Payments contracts due to insufficient funding; and
 - B. Randomly choose applicant families (considering all adopted preferences) to place on the waiting lists process for participation in the Housing Choice Voucher Program.
- Adopt rules which allows the HPHA to conduct Home Quality Standards (HQS) inspections every other year for units that passed inspection on the first attempt, except in circumstances where the HPHA determines a need for an annual inspection (e.g. tenant complaint), then the HPHA will do an annual inspection instead of biennial.

- Adopt Administrative Rules where the HPHA may award Housing Choice Vouchers to public housing residents for the following reasons in the following order and not equal priority:
 - a) Existing public housing tenants who are involuntarily displaced for reasons such as for relocation due to modernization activity, or based on an emergency where conditions of the public housing dwelling unit, building, or project pose an immediate, verifiable threat to life, health or safety of the family, and the family cannot be relocated to another public housing unit in the same program, meeting their needs.
 - b) Approved for a transfer as a reasonable accommodation for a unit with special features based on need and availability.
 - c) Victims of domestic violence, or stalking, or reprisals, or hate crime, and cannot be safely transferred to another public housing unit in the same program.
 - d) Homeless families, provided “Homeless” is defined by HUD.
- Establish a policy to allow for the use of Special Purpose Vouchers, including but not limited to mainstream vouchers, VASH, mobility vouchers, and Family Unification Program vouchers, and provides that recipients of SPVs are exempt from being terminated from the program when there is insufficient program funding.
- Amend family break-up policy to award the voucher to the family member who is awarded custody of the majority of minor children or who has the majority of days of custody. [24 CFR 982.315]
- Amend Housing Choice Voucher policy to require applicants with a criminal history to include latest conviction date or arrest date.

The HPHA plans to adopt changes to its Administrative Rules, Admissions and Continued Occupancy Policy, and Administrative Plan as follows:

- Adopt Administrative Rules to allow the HPHA to implement a lottery system to randomly choose applicant families (considering all adopted preferences) to place on the waiting lists process for participation in the public housing program if feasible.
- Update preference policy to remove from definition of “involuntarily displaced”, applicants who are displaced by action of the housing owner for reasons beyond the applicant’s control and despite the applicant meeting all previously imposed conditions of occupancy.
- Update preference policy to redefine Homeless individuals as those in a transitional shelter who are verified to be in compliance with a social service plan or other former transitional homeless individuals and families who are verified to be “housing ready” as defined by the Hawaii Administrative Rules.
- Establish definition for “Housing Ready”.
- Expand local preferences to include veterans and their surviving spouses for the federal public housing program.
- Amend applicant waitlist policy from geographic waiting lists to site-based waiting lists for the federal public housing program.
- Update Federal Housing acceptance policy relating to “good cause” refusal, to eliminate existing rental agreements that cannot be breached without causing undue financial hardship, and “the applicant’s acceptance of the offer would result in undue hardship not related to consideration of race, color, national origin, or language and the applicant presents evidence which substantiates this to the authority’s satisfaction.
- Amend continued occupancy reexamination results policy to not renew a lease if a family who has not complied with the community service requirement one year, does not become compliant by the end of the second year.
- Amend initial occupancy guidelines to assign one bedroom for every two-family members only, with consideration for infant children, disability-related reasons and the presence of a live-in aide.

- Update “schedule of charges” policy by having the maintenance work-order system record the actual cost of materials and time spent by maintenance workers to charge tenants the actual cost of intentional, careless or negligent damages beyond normal wear and tear. (24 CFR part 966.4)
- Amend Hawaii Administrative Rules to include updated Violence Against Women Act (VAWA) policy for federal public housing and the Housing Choice Voucher program.
- Update policy on individual relief from excess utilities in the Hawaii Administrative Rules.
- Adopt and incorporate future changes determined to be required under applicable state or federal law, rule, or regulation.
- Establish an external storage policy that adheres to all rules, requirements and laws.
- Establish policies for the implementation and use of new Emergency Housing Vouchers, allowing for various HUD exceptions and waivers. Policies to include, but are not be limited to, admission, continued occupancy and termination.
- Establish policies for the implementation and use of any additional offering or allocation of special purpose vouchers, including any mandatory, alternative or discretionary policies issued under the program guidance. •
- Establish policies which support operational efficiencies, increase participation, or increase program flexibilities, including policies which may be required or proposed under programs such as the MTW Expansion Program.

3. Financial Resources

Sources	Planned \$	Planned Uses
Federal Grants		
a. Public Housing Operating Fund	30,591,000	Operations and maintenance of public housing
b. Public Housing Capital Fund	13,900,000	Capital repairs, management improvements, operations, administrative costs
c. Section 8 Tenant-Based Assistance	42,855,000	Housing Assistance Payments and Administrative costs
d. Family Self Sufficiency Program	72,000	FSS Coordinator expenses
Public Housing Dwelling Rental Income	21,780,000	Operations and maintenance of public housing
State Capital Improvement Program	10,000,000	Capital repairs and associated administrative costs
State General Fund	6,000,000	Operations, State Rent Supplement Program, maintenance, security and vacant unit turnaround of public housing
Total Resources for Public Housing or Tenant-Based Assistance	125,198,000	
Other Project-Based Resources; Performance Based Contract Administration	41,500,000	PBCA payments to landlords; administrative costs
Public Housing Non-Rental Income	410,000	Management improvements, operations for site location

4. Rent Determination Policies

The HPHA is proposing the following amendments/revisions/updates to its rent determination policies under the Housing Choice Voucher program:

- Adopt a policy to determine the amount of allowances for purposes of rent and subsidy determination in the Housing Choice Voucher program, and establish policy to cap the amount of child care expenses that can be claimed at the amount of the lower wage earned by working family members. [24 CFR 982.402 and 24 CFR 5.603]
- Adopt policy in the Section 8 program to determine which household will include a minor's unearned income into the household's income, in determining unit size, and eligible deductions where two households in the assisted housing programs share custody of minors. [24 CFR 5.609]
- Adopt a policy when determining income from assets for purposes of eligibility and subsidy determination in the Public Housing program and the Section 8 Housing Choice Voucher program. Update the policy determining the value of a checking account to be consistent with the policy determining the value of a savings account, by using the current balance, to reduce administrative burden and excessive paperwork and added expense for the applicant. [24 CFR 5.609, 24 CFR part 5.603]
- Update the HCV minimum rent policy to institute a minimum rent of \$50. [24 CFR 5.630]
- Create a hardship exemption policy in the HCV program.
- Amend Housing Choice Voucher policy relating to interim increases. Interim increases will only occur if 1) the client misrepresented or failed to report facts upon which rent is based, 2) when income increases after a client was granted an interim decrease, 3) the client reported zero income and has verified an increase, including a non-monetary contribution, 4) a person with income joins the family, or 5) a family member has an increase of earned or unearned income greater than \$200 per month unless meet CFR qualification for exemption.
- Amend Housing Choice Voucher policy relating to interim decreases. A decrease in income for any reason will prompt a rent reduction, except for a decrease that lasts less than 30 days or is subject to imputed welfare income rules; a decrease must be reported to the HPHA by the 15th of the month in order for it to take effect the following month.
- Adopt a policy to hold HCV families in affected payment standard tiers harmless for the difference in gross rent if there is a drop in the tier's payment standard resulting in the gross rent exceeding the payment standard.

5. Operations and Management

The HPHA plans to undertake the following activities:

- Amend HCV and public housing policies to allow for the virtual inspection of housing units using technology solutions, accept electronic documents and hold electronic tenant briefings, subject to availability under HUD rules or waivers.
- Open and close the wait list in 2021 for a limited time, if necessary, to ensure an adequate pool of applicants.
- Continue the use of the Hawaii State Landlord Incentive Program to incentivize landlords to participate in the housing choice voucher program, subject to the availability of funds. The incentives that the HPHA will seek to implement are:
 - a) Reimbursement for costs to repair tenant-caused damages to the dwelling unit when repair costs exceed the tenant's security deposit, up to \$3,000.
 - b) Vacancy Loss Payments.
 - c) Front-end Vacancy Loss Payments.

d) Other Landlord Incentives – Signing Bonuses.

- Adopt new administrative rules and changes to the Admissions and Continued Occupancy Policy to provide for individual relief from surcharges for excess consumption of HPHA purchased utilities or from payment of utility supplier billings in excess of the allowances for resident-purchased utilities.
- Implement public housing security improvements, including establish quiet times, utilize and require tenant ID cards, install video cameras and security features.
- Enforce no trespassing legislation, Act 31, Session Laws of Hawaii (SLH) 2018, passed June 7, 2018.
- Update and strengthen rules and policies related to drug use and serious criminal activities that threaten the health and safety of the public housing projects, including threats to staff, stealing of HPHA funds and destruction of property per Act 206, Session Laws of Hawaii (SLH) 2019.
- Adopt rules allowing families that exceed the largest public housing unit size to receive a Section 8 Housing Choice Voucher, rather than splitting the household to fit into existing unit sizes.
- Evaluate the current administration of HPHA’s Section 8 Housing Choice Voucher Program (Due to the recent change in funding levels for the Section 8 HCV Program by HUD, HPHA will be exploring options to maximize the number of voucher participants within the current HUD funding level):
- Increase the current number of active vouchers by leveraging HPHA’s “High Performer” status to participate in any current or future HUD programs and /or create and implement new programs in conjunction with the local HUD office.
- Update Utility Allowance schedules for the public housing and voucher programs as required.
- Conduct a utility usage study to determine whether the utility allowance is more efficiently used based in the unit size or the voucher size.
- Establish a verification policy to ensure potential live-in aides meet the three elements within the definition of Live-In Aide for the HCV program and public housing.
- Evaluate and assess internal procedures and policies to better ensure fraud protection in the HPHA programs.
- Revise the Admissions and Continued Occupancy Policy and applicable administrative rules to allow additions of no more than one family member as long as the addition does not require the family to be transferred to a larger unit and as long as the addition would not cause overcrowding of the unit in accordance with county occupancy standards. Adopt policy to allow adults, who have been removed from the lease for at least 6 months, back onto the lease.
- Adopt rules for tenants that enter public housing by way of citizen sponsorship into the State of Hawaii, to state that when the tenant does not have another source of income, the income of the sponsor will be included when calculating the rent for the tenants.
- Make available not less than fifty per cent of available federal and state low-income housing units for applicants without preference and up to fifty per cent of available federal and state low-income housing units for applicants with preference as mandated by ACT148-2013.
- Enforce smoking policies, implement newly adopted Act 127, SLH 2018, prohibiting smoking within twenty-five feet of any public housing building, and provide tenants with revised lease addenda outlining enforcement strategies for the “No Smoking” policy.
- Amend the HCV policy to state that when a family requests to be issued a new voucher, the household composition and income will be evaluated before a new voucher is issued.

- Amend the HCV policy to state that when a family composition is reduced, a voucher will occur at the end of the lease or the next annual recertification, whichever comes first.
- Adopt Hawaii Administrative Rules regarding the establishment and recognition of resident associations. HPHA will require that resident associations have duly elected board members.
- Establish program(s) to incentivize owners/landlords to participate in the Section 8 Housing Choice Voucher Program, such as a program to reimburse owners/landlords for repair costs of tenant-caused property damage when the repair costs exceed the tenant's security deposit, direct deposit for Housing Assistance Payments or other on-time methods of payment, etc.
- Seek to become a Moving-to-Work (MTW) agency, or its successor program, to receive relief from rigid HUD regulations, allowing local approaches and solutions to offering Low-Income Public Housing and Housing Choice Vouchers in a more streamlined manner, and gain more flexibility in the use of federal funding for the Housing Choice Voucher and Low-Income Public Housing programs, where currently none exists.
- Explore opportunities for low-income public housing residents to have access to free or low cost broadband internet services to be used for improving job skills, accessing tele-health and increasing educational opportunities.
- Adopt Administrative Rules allowing for the use of biennial reexaminations across all Housing Choice Voucher related programs, including Emergency Housing Vouchers.
- Establish a policy to transition Foster Youth to Independence (FYI) Voucher participants to Housing Choice Vouchers once the participant has reached their maximum allowed time in the FYI program.

6. Significant Amendment/Modification

Significant Amendment/Modification: Adding or eliminating major strategies to address housing needs and to major policies (e.g., policies governing eligibility, selection or admissions and rent determination) or programs (e.g., demolition or disposition, designation, homeownership programs or conversion activities); or modifying a strategy such that a substantial transfer of resources away from others is necessary in order to carry it out. Under this PHA Annual Plan, the HPHA is clarifying that any change required to comply with state or federal rule, law, or regulation, where the HPHA is not able to adopt discretionary policy, would not be considered a significant amendment. However, the HPHA would continue to work with the Resident Advisory Board, Resident Associations, and staff for comments.

For Capital Fund Program projects that deviate from the Capital Fund Program Five-Year Action Plan and the Capital Fund Program Annual State/Performance and Evaluation Reports, only projects that meet the following criteria shall require 5-Year and Annual Plan Amendment: the amount of funds being required exceeds \$10 Million and/or the number of units being worked on comprises more than 15% of a developments ACC unit count. For major modernization projects, to adopt the most current year Total Development Cost (TDC) Limits published by HUD if for only one location (ie. Hilo) to be used for the entire state of Hawai'i.

As part of the Rental Assistance Demonstration (RAD) Program, the definition of a substantial deviation from the agency's annual plan will exclude the following RAD-specific items, provided that the adjustments to the RAD plans are authorized by HPHA's Board of Directors in the normal course of business:

- Changes to the Capital Fund Budget produced as a result of each approved RAD conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- Changes to the construction and rehabilitation plan for each approved RAD conversion;
- Changes to the financing structure for each approved RAD conversion;
- The date the significant amendment is submitted to the PHA Plan website;
- Decisions to dedicate a portion of the agency's existing capital funds budget and/or public housing reserves as a source of funds for purposes of a RAD conversion and recapitalization transaction;

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

	See Attachment A: Deconcentration Policy.
B.2	New Activities. (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N ☐ ☒ Hope VI or Choice Neighborhoods. ☐ ☒ Mixed Finance Modernization or Development. ☐ ☒ Demolition and/or Disposition. ☐ ☒ Designated Housing for Elderly and/or Disabled Families. ☐ ☒ Conversion of Public Housing to Tenant-Based Assistance. ☒ ☐ Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. ☒ ☐ Occupancy by Over-Income Families. ☐ ☒ Occupancy by Police Officers. ☐ ☒ Non-Smoking Policies. ☐ ☒ Project-Based Vouchers. ☒ ☐ Units with Approved Vacancies for Modernization. ☒ ☐ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). (b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. 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. <u>HOPE VI or Choice Neighborhoods</u> The HPHA will assess the feasibility of pursuing all means of financing, including the RAD or Choice Neighborhoods programs, if appropriate for its redevelopment efforts at Mayor Wright Homes, Kuhio Park Terrace and potential future developments at AMP 30, AMP 31, AMP 32, AMP 33, AMP 37, AMP 38, AMP 39 and AMP 40. <u>Mixed Finance Modernization or Development</u> Mayor Wright Homes redevelopment (AMP 32, Project #1003; 364 units) HPHA issued a Request for Qualifications (RFQ) on July 11, 2014 for a developer/partner to compete in a mixed-income, mixed-finance, mixed-use redevelopment project at Mayor Wright Homes. MWH Partners, LLC was selected as the Master Developer team leader, and a Predevelopment Agreement was executed on March 24, 2016. The Predevelopment Agreement terminated upon the execution of a fully negotiated Master Development Agreement with MWH Partners, LLC on December 29, 2017. Preparation of an Environmental Impact Statement (EIS) is required pursuant to Chapter 343, Hawai'i Revised Statutes and Chapter 200, Title 11, State of Hawai'i Department of Health Administrative Rules. HPHA submitted the EISPN to the State of Hawai'i Office of Environmental Quality Control (OEQC) on September 13, 2016. A Draft EIS was submitted to the OEQC on August 28, 2017 and a Final EIS was accepted by, The Honorable David Y. Ige, Governor, State of Hawai'i (the "Accepting Authority") April 24, 2018. A Request for Release of Funds and Certification (HUD Form 7015.15) was signed by the Accepting Authority on June 19, 2020. A Draft Environmental Assessment, as required under 24 CFR Part 58, National Environmental Protection Act ("NEPA") has been prepared with an initial determination of Finding of No Significant Impact on the NEPA DEA signed by the Honorable David Y. Ige, Governor, State of Hawai'i and Certifying Officer for the Responsible Entity February 3, 2020. A NEPA Final Environmental Assessment (FEA) and Notice of Intent to Request Release of Funds was submitted to the Hawaii Office of Environment and Quality Control ("OEQC") on April 30, 2020 and was published in the OEQC's The Environmental Notice on May 8, 2020. However, due to a lack of meaningful progress with respect to the redevelopment plan of Mayor Wright Homes, and the developer's failure to meet certain milestones as required under the Master Development Agreement, HPHA's Board of Directors elected to terminate the Master Development Agreement with MWH Partners, LLC for

convenience on July 20, 2020. The HPHA terminated the developer, but is committed to the Mayor Wright Homes redevelopment project, and is now seeking another developer(s) and assessing its options for moving the Mayor Wright Homes redevelopment forward.

HPHA has been working with an architectural firm to complete several potential gross massing designs based for the project based on the existing Master Plan. The gross massing design will inform the final 201H-38 zoning and entitlement application for the project and will also be presented for comment during public engagement once the new development partner has been selected and COVID-19 protocols allow. Procurement for a new development partner for phase 1 of the project is now underway.

Kuhio Park Terrace, Kuhio Homes and Kuhio Park Terrace Low-Rise Redevelopment (AMP 40, Project #s 1007, 1010; 174 units)

HPHA received a \$300,000 Choice Neighborhoods Initiative (CNI) planning grant in 2012, which resulted in a comprehensive Transformation Plan with input from community members, stakeholders and partners to revitalize the Kuhio Park Terrace, Kuhio Homes, Kuhio Park Terrace Low-Rise and Kalihi neighborhood area. The HPHA Board approved a Restated and Amended Master Development Agreement with the Michaels Development Group for the second phase of the mixed finance redevelopment at Kuhio Park Terrace Low-Rise and Kuhio Homes on June 25, 2020. Contracts have been finalized and executed with the primary consulting team including a project architect, planner, and civil engineer. The updated Master Planning and Environmental Review efforts are now underway.

Puuwai Momi Redevelopment (AMP 30, Project #1026)

The HPHA is exploring a potential mixed-use, mixed-income redevelopment of its Puuwai Momi property, an aging, 260-unit, public housing community located in Halawa. The site is comprised of three land parcels totaling 11.74 acres and is considered an especially attractive redevelopment candidate due to the higher site density available under the City's Halawa Area TOD Plan recently adopted in December 2020, its proximity immediately south of the Aloha Stadium HART station and the redevelopment of Aloha Stadium which anticipates a new sports stadium surrounded by entertainment venues, retail, restaurants, residential, hotels, recreational and green space areas. The HPHA has participated in several meetings with the state Department of Accounting and General Services and the Stadium Authority to discuss potential coordination of these projects. HPHA prepared and submitted a competitive proposal to the Office of Planning and Sustainable Development ("OPSD"), State of Hawai'i for a State TOD Planning Grant for its Pu'uwai Momi Project which has been awarded \$400,000 in State TOD CIP Planning funds in Fiscal Year 2022, which were appropriated by the State Legislature in 2021. The funding will be utilized to develop a preliminary Master Plan to guide the redevelopment of the project that has been approved by the State TOD Council for inclusion in the State Strategic Plan for Transit-Oriented Development. HPHA is exploring a mixed-use, mixed-income redevelopment of the property's 260 public housing units which were originally built in 1969. The site is comprised of three land parcels totaling 11.74 acres and is considered an especially attractive redevelopment candidate due to the higher density housing available under the City's Halawa Area Transit-Oriented Development (TOD) Plan recently adopted in December 2020 and its proximity immediately south of the Aloha Stadium and HART station. The objective of the preliminary master plan will examine redevelopment of the site to maximize delivery of additional affordable housing units to alleviate the City and the State's severe affordable housing shortage.

Lanakila Homes (AMP 37, Project #1014)

On October 8, 2020, the HPHA was informed by The State of Hawaii Office of Planning that its Lanakila project on the Island of Hawai'i had been selected for funding under its FY21 \$1.5 million CIP (GO) appropriation (Act 6, SLH 2020, Section 3, Item K, Capital Project No. 0.1). Four projects out of nine submitted were selected for funding. HPHA's Lanakila project was granted the largest award at \$550,000. The award was publicly announced at the TOD Council's October 13, 2020 meeting.

The requested grant will provide funding for a new master plan for the site to address updated site conditions and streets that will need to be constructed to recently revised County of Hawai'i Standards. The new master plan will also examine how additional density could deliver additional affordable housing units to the community, the appropriate demographic mix of those units and determine what infrastructure may be required to support them.

Additionally, as the County of Hawai'i moves forward with its Complete Streets and a multi-modal transportation system, it is important to create adjacent streetscapes that provides "first and last mile" walking and bicycling opportunities. This can facilitate ease of access to future nearby bus facilities along Moho'uli and Kino'ole Streets.

Improvements may include sidewalk infill, installation of bike lanes, curb extensions, safe crossings, and potential bus stops.

Kahekili Terrace (AMP 39, Project 1017)

HPHA prepared and submitted a competitive proposal to the Office of Planning and Sustainable Development (“OPSD”), State of Hawai‘i for a State TOD Planning Grant for its Kahekili Terrace project which has been awarded \$225,000 in State TOD CIP Planning funds in Fiscal Year 2022, which were appropriated by the State Legislature in 2021. The project has been included in the State Strategic Plan for Transit-Oriented Development and the HPHA will use these funds to prepare a preliminary master development plan for the 3.9-acre parcel which is currently occupied by ten two- and three-story buildings providing approximately 60 units. The property is located within Maui County’s Wailuku Redevelopment Area and the preliminary master plan will identify redevelopment opportunities that would result in additional affordable housing units onsite, streetscape and multi-modal transportation improvements to enhance connectivity with the Wailuku Redevelopment Area and Wailuku Market Street corridor. The Project area includes an area with contaminated soils, which will also be studied.

Kapa`a and `Ele`ele Homes (AMP 38, Project #1018 and #1020)

HPHA is exploring a potential partnership with the County of Kauai to possibly redevelop public housing properties on Kauai.

Mixed Finance Redevelopment

The HPHA continues to evaluate and identify additional properties within its existing portfolio and on all islands that have potential for public-private, mixed-finance, mixed income, mixed-use redevelopment opportunities through Section 18 of the Housing Act of 1937 and various HUD programs including, but not limited to, the Rental Assistance Demonstration program (RAD), Choice Neighborhoods Initiative, VASH and any other federal, state, or local source, such as the issuance of PHA bonds pursuant to Chapter 356D, Hawaii Revised Statutes. Potential properties currently under review for their redevelopment potential include properties at AMP 30, AMP 31, AMP 32, AMP 33, AMP 37, AMP 38, AMP 39 and AMP 40.

HPHA believes the redevelopment of public housing and other properties through public/private partnerships has the potential to transform communities and improve the living conditions of its residents with updated or new amenities, open public spaces, accessibility and walkability.

The HPHA is currently working on a mixed finance redevelopment of its School Street Administrative Offices. The current proposed project does not presently contemplate the use of federal subsidies. However, the proposed project may change over time and, as such, the HPHA is providing notices of the potential for this public-private mixed-finance redevelopment to consider the use of various subsidies, including federal sources. The redevelopment project will focus on providing 800 senior rental housing units over multiple phases over the next 10-12 years.

Approval of the project’s 201H zoning and entitlement application was granted by the Honolulu City Council on November 5, 2020 as Resolution 20- 251, CD1, FD1. The Resolution granted the project approximately \$9.9 million in fee and other exemptions from statutes, ordinances, charter provisions, and rules relating to planning, zoning, construction standards for subdivision and development pursuant to HRS Sections 46-15.1 and 201H-38.

On July 9, 2021, School Street RHF Partners, Phase One, LP, (“RHF”) submitted a consolidated application on behalf of the HPHA School Street Redevelopment Phase 1A to HHFDC as a non-competitive application. The HHFDC approved the application at its October 14, 2021 Directors meeting as Resolution No. 163, which provides for official Intent with respect to the issuance of Hula Mae Multi-Family (“HMMF”)Tax-Exempt Revenue Bonds; and reservation of Low Income Housing Tax Credits for Phase 1 of the School Street Redevelopment.

The HHFDC resolution provides tax-exempt issuance of up to \$71,500,000 from the HMMF Bond Program, \$5,257,493 in annual Federal LIHTC over a 10-year period and \$5,257,493 in annual State LIHTC over a 5-year period from the non-volume cap pool (4% LIHTC).

A separate For Action was also presented to the HHFDC Board requesting approval of a Rental Housing Revolving Fund (RHRF) Loan of up to \$40,000,000 for the project was also approved at the October 14, 2021 meeting.

It should be noted that Resolution 163 is considered an "*Inducement Resolution*", a non-binding resolution, which states HHFDC's intent to possibly issue tax-exempt revenue bonds for a project.

One of the reasons for requesting the approval of the Inducement Resolution deals with recognizing the expenditures made by the developer. Pursuant to the Federal guidelines that govern tax-exempt bond financing, bond proceeds can reimburse eligible expenditures made 60 days prior to Inducement Resolution approval. Thus, the Developer is requesting the approval of the Inducement Resolution in order to be eligible for reimbursements on current expenditures for the Project.

The approval of the Inducement Resolution by HHFDC's Board may be viewed as "Official Action" being undertaken by the issuer (HHFDC), one of the requirements of the multi-family housing bond program. However, the approval of the resolution does not authorize the sale of tax-exempt bonds for the project. Section 147(f) of the Internal Revenue Code requires that the "applicable elected representative of the affected governmental units" approve all private activity bond obligations after a public hearing.

The approval of Resolution No. 163 only facilitates further discussions and negotiations between HHFDC staff, developer, underwriter, bond counsel, and other appropriate parties to determine the feasibility of the contemplated project. Approval of Resolution No.163 neither commits nor obligates HHFDC to issue bonds for the School Street project. HHFDC Board final approval for the issuance, sale, and delivery of bonds is still required and final bond issuance is subject to approval by the Department of Budget and Finance and the Governor. **The HPHA does not currently plan to include public housing or HCV project-based voucher units.**

Demolition/Disposition

The HPHA plans to request HUD approval for non-exclusive easements for reasons such as utility access over the federal public housing properties, or for other public benefit oftentimes related to its construction modernization activities. Such easement requests will not affect the ACC units count. The HPHA is exploring the dedication of streets and sidewalks to the City and County of Honolulu at Hale Laulima to allow fire trucks to enter a potential fire station from the rear, and to the County of Hawaii at Lanakila Homes. The dedicated areas will be owned and maintained by the City and County of Honolulu and County of Hawaii, respectively, with HPHA retaining the carved out parking areas for tenant parking assignments for the latter.

If an easement or street dedication is determined to be necessary, HPHA will follow HUD's Demolition/Disposition protocol to apply for and obtain the necessary approvals to proceed with rights of entry or granting of non-exclusive easement. The HPHA will pursue disposition of Mayor Wright Homes as part of a larger mixed finance redevelopment project.

HPHA may also request HUD approval for possible demolition and disposition of the Community Center at Kalihi Valley Homes. The elevated building is currently closed and is not in use. The HPHA has contracted with a consultant to study the alternatives of rehabilitating the structure or demolishing and replacing it with a new structure. If it is determined that demolition and disposition is necessary, HPHA will follow HUD's Demolition/Disposition protocol to apply for and obtain the necessary approvals to proceed with demolishing the community center. There will be no impact to the ACC units count.

HPHA may also request HUD approval for the possible demolition and disposition of the project at Pahala in AMP 37, Nanakuli Homes in AMP 44 and Kupuna Home O Waialua in AMP 49. These projects are not built to current code and the cost to modernize these projects and bring them to code is close to the cost to demolish and rebuild to current standards, codes and ordinances. If it is determined that demolition and disposition is necessary, HPHA will follow HUD's Demolition/Disposition protocol to apply for and obtain the necessary approvals to proceed with the demolition and disposition of units at Pahala.

HPHA is exploring a potential partnership with the County of Hawaii to provide the HPHA with HUD Community Development Block Grant Disaster Relief (CDBG-DR) funding to rebuild to current standards, codes and ordinances. There will cause a temporary affect to the ACC units count in AMP 37.

The construction of Phase IIIB at the Lanakila Homes property in East Hawaii to bring back 16 public housing units completed in March 2019, just as the COVID-19 pandemic was exploding, and the modernization of Salt Lake Apartments on Oahu to bring back 28 public housing units were completed and brought back online in September 2020.

Conversion of Public Housing to Project-Based Assistance under RAD.

HPHA will identify, analyze and evaluate all properties on all islands within its existing portfolio that have potential for conversion of public housing units to project based vouchers under HUD's RAD/Section 18 program. All, a portion, or none of the two subject properties may be submitted in an application to HUD. Kuhio Homes and Kuhio Park Terrace Low-Rise are currently being reviewed and analyzed to evaluate their feasibility for RAD conversion. A Letter of Interest under the RAD program was submitted to HUD in June 2017 for Mayor Wright Homes, Kuhio Homes and Kuhio Park Terrace. Applications were submitted to HUD on September 4, 2018 for participation in the RAD program in coordination with the HPHA's redevelopment partners. Commitments to Enter into a Housing Assistance Payments (CHAP) were issued to the HPHA in October of 2018 for Kuhio Park Towers, Kuhio Homes, Kuhio Park Terrace Low-Rise. The Financing Plan for KPT Towers was submitted in December 2020 and a RAD Conversion Commitment (RCC) was issued by HUD on May 16, 2021, closing documents were submitted to HUD in October of 2021 and the RAD conversion continues to move toward closing. Due to the lack of meaningful progress with respect to the redevelopment plan of Mayor Wright Homes, the RAD CHAP for this project was revoked by HUD on 9/16/20. The HPHA may resubmit a RAD application for this project as the redevelopment plans for this project continue to evolve and are further defined.

Occupancy by Over-Income Families

HPHA will implement an over-income tenant policy within the ACOP, in accordance with HUD's September 24, 2018 Notice in the Federal Register, "Housing Opportunity Through Modernization Act of 2016: Final Implementation of Public Housing Income Limit." Docket No. FR-5976-N-07.

HOTMA was signed into law on July 29, 2016 (Public Law 114-201, 130 Stat. 782); section 103 of HOTMA amends section 16(a) of the United States Housing Act of 1937 (42 U.S.C. 1437n(a)) (1937 Act) and establishes an income limitation for continued occupancy in public housing.

The law requires that after a family's income has exceeded 120 percent of the area median income (AMI) (or a different limitation as may be established by the Secretary) for two consecutive years (the "grace period"), a PHA must terminate the family's tenancy within 6 months of the third income determination or charge the family a monthly rent equal to the greater of:

- (1) The applicable Fair Market Rent (FMR); or
- (2) The amount of monthly subsidy for the unit, including amounts from the operating and capital fund, as determined by regulations.

The income limit established by HOTMA will be referred to as the "over-income limit." HOTMA requires HUD to determine the alternative rent options for families that remain in public housing through formal rulemaking. However, HUD has not published a final rule that implements this requirement, and PHAs are therefore not yet able to calculate alternative rents.

Through an annual reexamination or an interim reexamination, when the HPHA discovers that a family's income exceeds the applicable over-income limit, the HPHA must document that the family exceeds the threshold and make a note in the tenant file to compare it with the family's income a year later.

If one year after the initial over-income finding by the HPHA, the family's income continues to exceed the over-income limit, the HPHA must provide written notification to the family. This notification must inform the family that their income has exceeded the over-income limit for one year, and if the family's income continues to exceed the over-income limit for the next 12 consecutive months, the family will be subject to the fair market rent according to island, zip code, and bedroom size.

If the initial over-income determination was made during an interim reexamination, the HPHA must conduct a second interim income reexamination on that date one year later.

However, if the HPHA discovers through an annual or interim reexamination that a previously over-income family has income that is now below the over-income limit, the family is no longer subject to these provisions. A

previously over-income family would be entitled to a new two-year grace period if the family's income once again exceeds the over-income limit.

HPHA must ensure that all notices and communications are provided in a manner that is effective for persons with limited English proficiency, hearing, visual, and other disabilities. The HPHA must ensure effective communication using appropriate auxiliary aids and services, such as interpreters, transcription services, brailled materials, large print, and accessible electronic communications, in accordance with Section 504 and ADA requirements. 24 C.F.R. § 8.6 and § 8.28; 28 CFR part 35, Subpart E. This includes the availability, free of charge, of sign language or other types of interpretation. For persons with vision impairments, upon request, this may include materials in braille or on tape.

Higher Rent Payments – Fair Market Rent (FMR)

Within 6 months of the third income determination, if the family is still over-income, the family is subject to eviction or higher rental payments. The family will have to pay the current Fair Market Rent amount for their, island, zip code and unit size, following all HUD rules and guidance.

Project-Based Vouchers

HPHA plans to identify, analyze and evaluate all properties on islands within its existing portfolio for potential sites that might benefit from the use of project-based vouchers in addition to the properties listed below. The agency will also evaluate potential application for participation in the HUD Rental Assistance Demonstration program (RAD). Should space become available on a RAD waiting list in the future, the HPHA intends to submit a letter of intent for participation for properties where conversion is feasible and in the best interests of the State, the HPHA, and its tenants.

150 Project-based vouchers are part of the Kuhio Park Terrace Towers redevelopment, and the HPHA may consider adding additional Project-based vouchers for the Mayor Wright redevelopment and Kuhio Homes and Kuhio Park Terrace Low-Rise redevelopment. (HPHA is seeking additional replacement housing vouchers for public housing units that will be temporarily removed from inventory while the Kuhio Homes and Kuhio Park Terrace Low-Rise are redeveloped. Those units will be restored in future phases when redevelopment has been completed.)

305 units at Palolo Homes I and II: The Palolo Homes I and II site-based waiting list was closed by the Section 8 Branch in 2015, except for 4 bedroom units. **The list was reopened on June 7-9, 2021.** The waiting list will be reopened as needed. The HPHA will provide adequate public notice prior to reopening the waiting list.

Consistent with the HPHA's efforts to sustain and increase the availability of decent, safe, and affordable housing, the HPHA plans to continue its utilization of rent subsidy vouchers through the Federal Project-Based Certificate/Voucher Program. The HPHA will earmark up to the maximum allowable vouchers as specified in 24 CFR 983 and will utilize projects based on the counties of Oahu, Kauai, Maui, and Hawaii in accordance with program guidelines and objectives.

To maximize utilization and to encourage tenant development, HPHA applied for and received HUD approval on August 8, 2001, to exceed the 25 percent cap for dwelling units in any building to be assisted under a housing assistance payment (HAP) by requiring owners to offer supportive services. To minimize the loss of existing housing inventories, HPHA applied for and received HUD approval on October 4, 2001 to attach Project Based Assistance to State-owned public housing projects in areas, which exceed the 20 percent poverty rate limitation.

The HPHA is currently working on a mixed finance redevelopment of its School Street Administrative Offices. The current proposed project is contemplating the use of various forms of financing. The HPHA acknowledges that the proposed project may change over time and as such, the HPHA is providing notices of the potential for this public-private mixed-finance redevelopment to consider the use of various subsidies, including all eligible forms of federal funding sources that the project qualifies for such as project-based vouchers, low income housing tax credits, and public housing subsidies.

Units with Approved Vacancies for Modernization.

The HPHA continues to consider different ways to decrease unit turnaround time, improve occupancy, increase staff efficiencies. HPHA plans to permanently implement a multi-skilled worker program and establish a qualified force account to perform capital repairs on vacant units. By establishing a force account, HPHA will have more flexibility

and the ability to utilize its skilled labor and resources more efficiently. Additionally, HPHA has entered into a Memorandum of Agreement with the nonprofit, Kahau'iki Village Development to repair vacant units on O'ahu at an approximate value of \$9,000,000 at no cost to HPHA through the nonprofits' missional fundraising efforts to provide low-income housing. HPHA is also exploring the use of Indefinite Delivery Indefinite Quantity (IDIQ) procurement methods with the assistance of a consultant to expedite capital improvements. Under the Emergency Proclamation by Governor Ige, HPHA has also been able to modernize vacant units using an expedited procurement process in response to COVID-19 and will continue to do so as long as an Emergency Proclamation is in effect.

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

The HPHA will continue to review and determine the appropriateness of submitting competitive grant applications for other capital grant programs. If a grant is determined to be appropriate and a suitable target site can be identified, the HPHA plans to apply for grant programs for community facilities, emergency safety and security grants, HazMat testing and abatement grants, etc. The HPHA's AMPs on the Leeward Coast, Windward Oahu, Central Oahu, Honolulu, and Maui are potential sites for emergency safety and security grants. AMPs on Honolulu and Hawaii are potential sites for grants for community facilities.

Free or Low Cost Broadband

The HPHA is collaboratively working with the Hawaii Department of Transportation (HDOT) to participate in their Broadband Pilot Project, which aims to connect rural communities statewide and provide broadband opportunities for Hawaii residents in rural and traditionally underserved communities to empower HPHA public housing families in education, healthcare, workforce development, and economic recovery through and following the COVID-19 pandemic.

The following properties are located within the HDOT's Broadband Pilot Project areas:

Island	Development No./ Development Name	Project No. and Name
Oahu	HI001000031 Kalihi Valley Homes	1005 Kalihi Valley Homes
Oahu	HI001000032 Mayor Wright Homes	1003 Mayor Wright Homes
Oahu	HI001000033 Kaahumanu Homes	1009 Kaahumanu Homes
Oahu	HI001000033 Kamehameha Homes	1099 Kamehameha Homes
Oahu	HI001000035 Kalanihua	1024 Kalanihua
Oahu	HI001000040 Kuhio Homes	1007 Kuhio Homes
Oahu	HI001000040 Kuhio Park Terrace Low-Rise	1010 Kuhio Park Terrace Low-Rise
Oahu	HI001000044 Waimaha-Sunflower	1057 Waimaha-Sunflower
Oahu	HI001000044 Kauioakalani	1091 Kauioakalani
Oahu	HI001000044 Nanakuli Homes	1035 Nanakuli Homes
Oahu	HI001000045 Waimanalo Homes I	1025 Waimanalo Homes I
Oahu	HI001000045 Waimanalo Homes II	1107 Waimanalo Homes II
Oahu	HI001000045 Kauhale Hohana	1090 Kauhale Ohana
Hawaii	HI001000037 Pahala	1045 Pahala
Hawaii	HI001000037	1051

			Hale Aloha O Puna	Hale Aloha O Puna	
	Kauai	HI001000038	Kapaa	1018	
	Kauai	HI001000038	Hale Nana Kai O Kea	1054	
				Hale Nana Kai O Kea	
B.3	Progress Report. Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. A. Expand the supply of assisted housing: - The occupancy rate continued to fluctuate during FY 2021. HPHA's Multi-Skilled Worker (MSW) team, Memorandum of Agreement with the nonprofit, Kehau'iki Village Development to repair vacant units on O'ahu and HPHA's Construction Management Branch expedited repairs on vacant units. Additionally, due to the COVID-19 pandemic the Governor issued Emergency Proclamations that suspended state procurement rules to allow for faster procurements for COVID related activities. Under the Emergency Proclamation, repairs to safe, decent and sanitary conditions to an additional 96 vacant units were expedited to be able to house the most vulnerable population. As of June 30, 2021, the HPHA's adjusted occupancy rate was 96.065%. - HPHA and the Michaels Development Company continue to move forward with the Rental Assistance Demonstration (RAD) conversion for Kuhio Park Towers. This project will convert the remaining 347 public housing units in this development to a Project Based Voucher (PBV) subsidy program to best serve our residents. The United States Department of Housing and Urban Development (HUD) issued Commitments to Enter into a Housing Assistance Payment (CHAP) to HPHA in October 2018 for Kuhio Park Towers, Kuhio Homes, and Kuhio Park Terrace Low-Rise. A Financing Plan for the conversion for Kuhio Park Towers was submitted to HUD in December 2020. HUD's Office of Multifamily Housing issued a RAD Conversion Commitment (RCC) for the conversion of the remaining public housing units at Kuhio Park Towers to PBV under the RAD program in May 2021. The RAD conversion successfully closed on November 30, 2021 with a Housing Assistance Payment effective contract date of December 1, 2021. - HPHA continues to assess and pursue various TOD and non-TOD the mixed income/mixed use/mixed finance/project based and higher density redevelopment projects, such as Mayor Wright Homes and other HPHA public housing properties, and continues to explore possibilities for creating mutually beneficial public/private partnerships by utilizing various HUD programs including but not limited to Rental Assistance Demonstration and Choice Neighborhood Initiative (CNI), and will utilize various financing tools including but not limited to federal grants, state appropriations and low-income housing tax credits to rehabilitate and redevelop federal and state low-income housing and other properties. - HPHA's Lanakila project on the Island of Hawai'i has been selected by the state Office of Planning and Sustainable Development (OPSD) for funding under its FY21 \$1.5 million CIP (GO) appropriation (Act 6, SLH 2020, Section 3, Item K, Capital Project No. 0.1). Four projects out of nine submitted were selected for funding. HPHA's Lanakila project was granted the largest award at \$550,000. - HPHA has assessed the need to establish policies to minimize the number of over-income families in public housing, including possible termination of tenancy for such families. There are currently 2 AMPs where the minimum income falls below the 85% level. - During the 2021 Legislative Session, the Hawaii State Legislature appropriated \$10,000,000 in a lump sum of capital improvement project bond funding that will be used to repair and maintain federal and state low-income public housing properties. - HPHA assisted 846 families through Emergency Hawaii Administrative Rules through the creation of a "lease in place" preference to combat and prevent homelessness and eliminate the need for applicants to risk exposure of COVID-19 by searching for housing, and to provide Housing Choice Vouchers to those who are currently in a lease and income qualify for the program, along with a "landlord incentive program" that provides a \$500 gift card to assist landlords who need to address non-life threatening Housing Quality Standard inspection deficiencies in order to participate in the HCV program.				

- HPHA created Emergency Hawaii Administrative Rules to select Section 8 applicants who apply for the “lease in place” preference through a lottery system.
- In the previous period, HPHA adopted several HUD waivers allowed under PIH Notice 2020-05 and PIH 2020-33(HA), Rev-2 to keep its federal public housing and voucher programs operational to the extent practical.
- HPHA continues to work with its consultant and development partners to pursue development at targeted properties including AMP 32 Mayor Wright Homes, AMP 40 Kuhio Homes and Kuhio Park Terrace Low-Rise. HPHA continues to consider additional redevelopment options including AMP 30 Puuwai Momi, AMP 37 Lanakila Homes, AMP 38 Eleele Homes and Kapaa, and AMP 39 Kahekili Terrace.
- HPHA continues to assess the feasibility of acquiring or developing more properties to create additional housing opportunities on all islands.

B. Improve the quality of assisted housing:

1. Improve public housing management: (PHAS score)
 - HPHA is currently a standard performer with a score of 86.
 - PHAS Financial Condition – Maintain rent collection rate of 97% or better at all properties. Due to the COVID-19 pandemic, the HPHA is working with our County partners to assist our public housing tenants address their delinquent rent balances through their Emergency Rental Assistance programs.
 - HPHA established a multi-skilled worker program to promptly repair and maintain units that become vacant on a regular basis for faster and more efficient turnover of units, including establishment of a highly skilled force account for capital repairs. HPHA’s Multi-Skilled Worker (MSW) team, Memorandum of Agreement with the nonprofit, Kahau’iki Village Development to repair vacant units on O’ahu and HPHA’s Construction Management Branch expedited repairs on vacant units and utilizing the Governor issued Emergency Proclamation.
 - HPHA implemented online banking services to allow tenants to pay their rent electronically rather than physically going into the bank.
 - HPHA staff is utilizing mobile electronic technology (e.g., tablets and smart phones) to conduct pre-inspections for REAC inspections. Management staff is expected to transition to web based and mobile technology within their AMPs once the HPHA has established procedures and procured the necessary equipment to properly implement this task.
 - HPHA implemented new procedures whereby the Hearings Office tracks rent collections in order to assist AMPs early in the delinquency process. HPHA will continue its efforts to improve the tenant collection system.
 - HPHA maintains agreements with DHS to access and verify welfare information maintained by DHS to reduce incidence of fraud.
 - HPHA is drafting policy updates related to policies requiring occupants to establish legal residency in the United States to receive subsidy for an additional bedroom in the Section 8 program.
2. Improve voucher management: (SEMAP score)
 - HPHA was designated a High Performer.
 - HPHA utilized funds received to exceed 98% HPHA is looking to hire a landlord liaison to assist in performing landlord outreach and identifying available units for lease up.
 - HPHA will absorb veterans that have completed their service plans.
 - HPHA is currently drafting updates to the policy on additions to the household after admission into the Housing Choice Voucher program to deny additions of an additional household consisting of more than one member to the Housing Choice Voucher except by birth, adoption, or court-awarded custody, or marriage, when the addition would increase the subsidy to the family.
 - HPHA is rewriting the payment standard using the small area fair market rent as required by Federal requirements for the Housing Choice Voucher program.
3. Increase customer satisfaction:

- HPHA has created Emergency Hawaii Administrative Rules to prevent face-to-face meetings with tenants and applicants of the public housing and Section 8 programs to ensure appropriate communication while staying safer at home due to the COVID-19 pandemic.
 - HPHA has created Emergency Hawaii Administrative Rules to provide for interim rent adjustments for the Section 8 program to reflecting a lower rent to be effective as of the date the participant's income decreased due to the COVID-19 pandemic.
 - HPHA has implemented automated applicant waiting list portal and has brought the applicant portal on line. The applicant portal allows applicants to check on their applications and update information directly to their electronic application.
4. Concentrate on efforts to improve specific management functions:
 - HPHA continues to revise and implement plans to have Tenant Monitors or other resident participation programs to address issues when managers are not available.
 5. Continue to renovate or modernize public housing units with priority to health, safety, accessibility, end of useful life and energy conservation.
 - HPHA has completed a thorough testing of all projects built before 1978 utilizing the XFR testing method and additional full Lead Risk Assessment where there are positive results for Lead Based Paint, HPHA continues to completely remove or encapsulate all lead-based paint hazards from all its properties. All affected property maintenance staff will be required to be certified in lead-based paint.
 - Due to changes in the Fire Code, HPHA will be upgrading its tower buildings to have sprinklers where indicated by code at Pumehana.
 - All Capital Improvement Projects completed in FY21:
 - 8/24/2020 – **Waipahu I** – Structural Assessment; Des: \$15,971 CFP
 - 8/24/2020 – **Waipahu II** – Structural Assessment; Des: \$15,971 CFP
 - 9/5/2020 – **Salt Lake Apartments** – Major Modernization Ph II; Des: \$94,935 CIP; Const: \$7,869,905 (\$5,384,375 CIP, \$2,485,530 CFP)
 - 10/21/2020 – **Hale Laulima** – ADA Modifications; Des: \$0; Const: \$123,400 CIP
 - 11/6/2020 – **Punchbowl Homes** – Call for Aid Upgrade; Des: \$134,425 CIP; Const: \$2,004,248 CFP
 - 12/8/2020 – **AMP 38 (Kaua'i)** – Emergency Proclamation Vacant Units Repairs; Des: In-House; Const: \$1,522,016 AMP Federal Operating Funds
 - 1/12/2021 – **Hui O Hanamaulu** – AMP 38 Infrastructure Improvements; Des: \$87,317 CIP; Const: \$556,250 CIP
 - 1/12/2021 – **Hale Nana Kai O Kea** – AMP 38 Infrastructure Improvements; Des: \$130,757 CIP; Const: \$365,075 CIP
 - 1/12/2021 – **Hale Ho'olulu** – AMP 38 Infrastructure Improvements; Des: \$30,124 CIP; Const: \$31,140 CIP
 - 1/26/2021 – **Hale Aloha O Puna** – Emergency Proclamation Vacant Units Repairs; Des: In-House; Const: \$361,891 AMP Federal Operating Funds
 - 3/12/2021 – **15 Vacant Units Various O'ahu Sites** – Emergency Proclamation Vacant Units Repairs; Des: In-House; Const: \$1,078,263 AMP Federal Operating Funds
 - 3/29/2021 – **34 Vacant Units Various O'ahu Sites** – Emergency Proclamation Vacant Units Repairs; Des: In-House; Const: \$2,311,167 AMP Federal Operating Funds
 - 5/4/2021 – **Lanakila Homes** – Burnt Unit Repairs; Des: In-House; Const: \$391,464 CIP
 - 5/25/2021 – **Makamae** – Ventilation System Upgrade; Des: \$8,000 CIP; Const: \$95,476 CIP
 - 5/25/2021 – **Kalanihuia** – Ventilation System Upgrade; Des: \$7,725 CIP; Const: \$63,716 CIP
 - HPHA is **completing** a systematic assessment and upgrade of all major building systems for its high-rises, including elevators, fire prevention systems, **generators, exhaust systems**, call-for-aid systems, and fire **alarm systems**.
 - HPHA contracted with EMG to address barriers to accessibility at HPHA properties. Site assessments for mobility and visual/hearing accessibility were completed at all HPHA properties, management offices and administrative offices. A Needs Assessment report was created with input from advocacy groups and the public, and a Transition Plan will be submitted to HUD at the end of **2022**.
 6. Demolish or dispose of obsolete public housing and provide replacement housing.
 - The HPHA will assess the need to demolish or dispose of obsolete public housing and provide replacement housing at Nanakuli Homes and Kupuna Home O Waiialua on O'ahu.

- HPHA seeks to partner with the County of Hawaii to provide the HPHA with HUD Community Development Block Grant for Disaster Recovery (CDBG-DR) funding to rebuild streets at Lanakila Homes to current standards, codes and ordinances.
- HPHA seeks to partner with the County of Kauai to redevelop and increase density at existing public housing properties.
- HPHA seeks to partner with the County of Maui to redevelop and increase density at existing public housing properties.

C. Increase assisted housing choices:

- HPHA has entered into a Memorandum of Agreement with the Child Welfare Services Branch, Social Services Division of the Hawaii State Department of Human Services in relation to their assistance to pursue the Foster Youth to Independence initiative. As of June 30, 2021, the HPHA has 5 participants.
- The HPHA adopts a payment standard every year for the HCV program for Oahu zip codes to use Small Area Fair Market Rent (SAFMR) and adjusted the payment standards between 90% and 110% based on projected housing assistance funding shortfall, with adequate notice to program participants.
- HPHA will continue to consider the establishment/implementation of designated elderly only housing.
- HPHA has established a Landlord Incentive Program and has hired a Landlord Liaison to administer the program. The Landlord Liaison will look to increase the availability of safe, decent and sanitary housing by conducting outreach to unit owners throughout the City and County of Honolulu for its Housing Choice Voucher Section 8 program, per available funding.
- HPHA was awarded funds from the Mainstream Voucher Program Fiscal Year 2019 Notice of Funding Availability (NOFA) (FR-6300-N-43). The HPHA has contacted the Financial Management Center (FMC) to select an effective date of July 1, 2020 to distribute the 60 units with a budget authority of \$850,040 for a term of 12 months. As of June 30, 2021, the HPHA has 26 participants.
- HPHA submitted its Moving To Work (MTW) Plan and Application Package to HUD's MTW Demonstration Program Expansion for fiscal year 2021: Cohort #4 – Landlord Incentives. Based on an assessment of the local rental housing market conditions and feedback from the landlords, the HPHA selected three landlord incentives to implement if selected for the MTW Demonstration Program. They are: Vacancy Loss Payments, Front-end Vacancy Loss Payments, and Other Landlord Incentives – Signing Bonuses. On January 27, 2022, the HPHA received an award letter from HUD indicating that the HPHA was selected for admission to HUD's Landlord Incentives Cohort of the MTW Demonstration Program.

CI. Provide an improved living environment:

- HPHA implements measures to de-concentrate poverty by bringing higher income public housing households into lower income developments. Currently, there are two AMPs where incomes fall below the 85% mark.
- Created health and safety policies through Emergency Hawaii Administrative Rules in response to the COVID-19 pandemic that include the required wearing of facial coverings, restricting visitors, HPHA staff rules when entering a tenant's unit and penalties for the low-income public housing program.
- HPHA distributed tens of thousands of facial coverings, worked expeditiously to focus on repairing vacant units and moved in hundreds of families into available public housing units, distributed cleaning supplies to staff and residents when they test positive for COVID-19, distributed hand sanitizer, and launched free Wi-Fi at ten of its public housing communities throughout the State in response to the COVID-19 pandemic.
- To better inform our community about what the HPHA is doing to assist our Public Housing residents, Section 8 program participants, applicants and HPHA staff, the Agency created the following website: <https://www.hphaishereforyou.org/>. The website entails what the HPHA is doing to slow the spread of COVID-19 by severely limiting face-to-face interaction by fostering communication through U.S. mail, email, phone or video conference, implementing social distancing, housing safeguards and health measures to the disadvantaged populations that we serve.
- HPHA worked, and continues to work, hand-in-hand with the Hawaii State Department of Health Public Health Nurses and the Hawaii National Guard to conduct COVID-19 outreach and education events at the Agency's larger public housing properties. Teams of nurses, doctors, guard members, and interpreters canvassed the properties and talked to residents, and handed out flyers in English and other translated languages to educate the community about the COVID-19 virus. Mainly educational in nature, the teams showed people how they could stay safe and healthy, but also tested anyone in the household that had flu-like symptoms. Outreach events covered 23 properties and over 2,400 units.

- HPHA continues to collaborate with the State Department of Health, State Executive Office on Aging, City and County of Honolulu Department of Community Services Elderly Affairs Division, American Association of Retired Persons (AARP), Hawaii Public Health Institute, Project Vision, Hawaii Pacific Health Medical Group, Kaiser Permanente, Queens Medical Center, 5 Minute Pharmacy, Pharmicare, Times Pharmacy, Papa Ola Lokahi, Kamehameha Schools, and other non-profit health groups to conduct safe and convenient COVID-19 vaccination and booster shot clinics at our public housing properties. Over 2,000 vaccinations have been administered, and we are anticipating that over 2,000 public housing tenants will receive booster shots.
- HPHA administered the Aloha Cares Emergency Feeding Program (ACEFP). This emergency feeding program protected public housing tenants and the general public from the spread of COVID-19 by ensuring people affected by State and local COVID-19 stay at home orders and the homebound to receive meals and access to food (e.g., food boxes) as appropriate. From July to October of 2020, the ACEFP served approximately 500,000 meals to the elderly, disabled and COVID-19 exposed participants.
- HPHA continues to implement public housing security improvements, such as increased lighting, video surveillance, resident identification cards, tenant participation with Resident Associations, and crime prevention through environmental design features.
- HPHA continues to pursue statutory authority to adopt rules to provide greater security for tenants and staff. Legislation to institute no trespassing 24 hours a day was passed and signed into law as Act 31 on June 9, 2018.
- Act 206 Session Laws of Hawaii 2019 provides HPHA the statutory authority to evict tenants who are convicted of a felony related to the HPHA's property or funds or its employees on HPHA property.
- Adopt rules to efficiently remove abandoned property from HPHA units to provide quicker turnaround of units.
- HPHA has contracted with the University of Hawaii to conduct a study on the livability of public housing and Section 8, and how to improve the lives of its residents.

E. Promote self-sufficiency and asset development of assisted households:

- HPHA will continue to strengthen opportunities for its Family Self-Sufficiency program through its continued involvement in network practices with private businesses, corporations, financial institutions and local agencies to promote education, homeownership and employment opportunities.
- HPHA conducts a job fair every year and participates as a vendor in other local job fairs such as Workforce Job Fair 2021, and posts notices at each of our projects (AMPs) inviting tenant attendance and participation.
- HPHA has engaged in individual counseling, assistance and mentoring in-house and encourages volunteers to work in any branch of our main office, to enable them obtain skills and experience to enhance employability. Our recently recruited resident services specialists will advance and expand this effort to secure outside service providers.
- HPHA continues to seek out programs and service providers to partner with. Further, we are involved in an initiative from Washington, DC to provide more caseworkers for the elderly and disabled and have recently recruited new resident services specialists to advance this effort.
- HPHA has a Tenant Aide program for residents to be hired on a part-time basis for up to 19-hours compensation, to gain experience and upward mobility, as has happened successfully in the past. However, residents need to be willing to take the opportunity to apply.
- HPHA has established the Tenant Hire program which allows tenants to apply for designed positions to obtain on-the job training, learn different skill sets, gain working experience in daily interaction with staff and general public at the property management offices, and apply for civil service positions after the training period. The property management offices frequently attempt to recruit low-income residents through local advertising media, signs prominently displayed at the property, contacts with community organizations and public or private agencies operating within the area in which the Section 3 covered program or project is located. HPHA also provides recruitment information to managers to distribute to their residents. HPHA holds several job fairs at local community places and at universities. Fliers are also posted at local community colleges to target college graduates. HPHA continue to recruit residents to Section 3 which includes the Tenant Aide Program for upward mobility, and be able to assist the properties in maintenance and administrative duties. The HPHA is working on a Section 3 business registry.

F. Ensure equal opportunity and affirmatively further fair housing:

- The Compliance Office worked with EMG to address barriers to accessibility at HPHA properties. Site assessments for mobility and visual/hearing accessibility were completed at all HPHA federal and state public housing properties, management offices and administrative offices. HPHA's DRAFT Title II Transition Plan was approved by the HPHA Board of Directors in October of 2019, and a public hearing was held in December; on-site staff training re: ADA-compliance was held for all of HPHA and privately managed staff, and we continue to work with consultant EMG to finalize HPHA's Section 504 Transition Plans.
- As of June 30, 2021, out of a total of 5,926 (5,064 Federal and 864 State) units, 338 units or 5.70% were accessible for mobility and 178 units or 3.0% were accessible for the sensory impaired. With another 42 units for mobility and 30 units for the sensory impaired currently under construction, when completed HPHA will be at 6.41% accessible for mobility and 3.51% accessible for the sensory impaired.
- Affirmative measures taken to ensure access to assisted housing includes intensive employee training, self-monitoring for quality assurance and progressively accomplishing the goals identified by the Analysis of Impediments to Fair Housing Choice. The HPHA is committed to planned affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sexual orientation, gender identity, marital status, familial status, and disability
- HPHA continues its on-going efforts to educate and provide information to the general population and to landlords.
- HPHA is conducting on-going training to educate staff, including Limited English Proficiency (LEP) training.
- Implementation of Section 504 and ADA transition plans for HPHA properties are continuous and consistent.
- HPHA will adhere to the three (3) year Voluntary Compliance Agreement through the HUD's Office of Fair Housing and Equal Opportunity for the purposes of executing HPHA's Accessibility Surveys, Needs Assessments, Self-Evaluations and Transition Plans; complete the transition plan, continue to engage in meaningful discussions with applicants and tenants with disabilities, advocacy groups and HUD during the implementation phase; pursue the HPHA's goal to exceed the minimum 5% ADA and 2% sensory (vision and hearing-impaired) requirement for accessible units, striving to meet the census data indication of need for this area of 6.8% mobility and 4.1% sensory units.
- Maintain the Limited English Proficiency (LEP) Provide training to non-English speaking and/or Limited English Proficiency speaking groups with an interpreter available on federal and state fair housing laws. HPHA continues to provide LEP individuals with free interpretation and translation services.
- HPHA continues to review policies to ensure compliance with HUD's equal access rule.

G. Improve the housing delivery system through cost-effective management of federal government programs and resources:

- Due to COVID-19, HPHA has supported teleconferencing infrastructure to allow for compliance with social distancing and used technology to achieve it. The purchase and setting of laptops, webcams, access points and implementation of Quality of Service (QOS) to allow for video and voicing to broadcast in parallel with data traffic has allowed a higher quality of service delivery.
- Updated our core application (Emphasys Elite) to version 2.0 increased performance and compliance with HUD mandated changes. Various offices were affected and training and changes to SOP were conducted. The implementation and opening of the MyHousing shifted traditional methods of application (physical presence and queues) into a streamlined online presence where applications can be done in rapid succession, in bulk and removing many operational layers involving staff labor and presence.
- HPHA in conjunction of Enterprise Technology Services (SOH|ETS) implemented various security upgrades. The most significant one being the replacement of Norton AV to Sentinel, to secure communication transmissions, detect and prevent viruses and other malicious applications, and customized to work with O365 products.
- HPHA's Palolo Project Based Voucher wait list remains closed except for four bedroom units.
- HPHA opened the KPT 3-bedroom waitlist through a lottery system.
- HPHA implements project based budgeting, project based accounting and management for federal public housing as required under Asset Management.
- HPHA has made significant progress in the timely evictions for non-payment of rent and timely write off of uncollectable accounts. The HPHA worked with the Department of the Attorney General to streamline the procedures for write off of bad debt.

	• HPHA continues to require that all appliance purchases and capital repairs utilize energy star fixtures and implement energy saving features where possible. • HPHA continues to automate major operation components of the PHA computer software such as work order processing and tracking, materials, inventory, and fixed assets to improve the efficiency and accuracy of financial accounting and reporting. • HPHA continues to upgrade computers, servers and devices with newer models to provide faster response time for users, and standardize all versions of business and office software. This upgrade simultaneously provides more efficient use of electricity (for hardware), and provides better security from malicious software via updated firmware. • HPHA continues its research and analysis of various content management systems for more efficient retrieval of documents stored electronically on the HPHA network. • HPHA continuously and successfully expands the use of video conferencing technology to further better communication between all HPHA properties on all islands. Additionally, a welcome consequence of the introduction of video conference technology is its increased use by various offices to accommodate and increase the pool of potential candidates for interviews by providing more flexibility in scheduling and mobility issues. • HPHA continues to grow its workflow automation with the implementation of web applications and digital signatures to provide a more consistent, faster and environmentally friendlier processing of business operations. • HPHA implemented Hawaii Administrative Rule (HAR) revisions to prohibit smoking in public housing, and provide tenants with revised lease addendum outlining enforcement strategies for the “No Smoking” policy. • Significant improvements have been made to strengthen internal controls, as results, quality of data integrity is increased, Comprehensive Annual Financial Reports (CAFR) and Financial Data Schedule (FDS) are generated in-house, audit findings decreased from 4 for FY14 to 2 for FY15, and to zero finding in FY17. • Per HUD notice PIH 2017-24 (HA), the HPHA has had third-party agreements for the use of cell phones towers. • HPHA is actively exploring and moving toward a paperless environment. • Evaluate the current administration of HPHA’s Section 8 Housing Choice Voucher Program (Due to the recent change in funding levels for the Section 8 HCV Program by HUD, HPHA will be exploring options to maximize the number of voucher participants within the current HUD funding level) • The HPHA continues its efforts to increase the current number of active vouchers by leveraging HPHA’s “High Performer” status to participate in any current or future HUD programs and/or create and implement new programs in conjunction with the local HUD office.
B.4	Capital Improvements. The HPHA’s most recently approved 5-Year Action Plan was approved in EPIC on May 25, 2021.
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:
C.	Other Document and/or Certification Requirements.
C.1	Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) have comments to the PHA Plan? Y N ☒ ☐

	(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
C.2	Certification by State or Local Officials. Form HUD 50077-SL, <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.
C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> , must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan? Y N ☐ ☒ If yes, include Challenged Elements.
C.5	Troubled PHA. (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A ☐ ☒ ☐ (b) If yes, please describe:
D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	Affirmatively Furthering Fair Housing (AFFH). 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. The HPHA adopted a policy of non-discrimination and prohibiting discriminatory practices in the operations, procedures, or programs it administers, to ensure that residents, program participants, and applicants for services or programs provided by HPHA are given equal opportunity in the provision of services. All complaints of discrimination received shall be processed fairly and promptly in accordance with the procedures the HPHA has established with respect to such complaints to assure HPHA's residents, participants, and applicants for programs and services who allege unlawful discrimination or other violation in programs, services, activities, or benefits provided by the HPHA their substantive and due process rights under Federal, State, and local nondiscrimination laws and with rules and regulations governing Fair Housing and Equal Opportunity in housing. There shall be no retaliation against an applicant, potential applicant, tenant, or other program beneficiary who has complained of discrimination. Retaliatory conduct is illegal and constitutes a separate violation of laws and rules. The PHA will comply with all laws relating to Civil Rights including:

- Fair Housing Act
- Section 515-3, Hawaii Revised Statutes
- Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity, 77 FR 5662
- Title VI of the Civil Rights Act
- Section 504 of the Rehabilitation Act
- Title II of the Americans with Disabilities Act
- Age Discrimination Act
- Executive Order 13166, August 11, 2000
- Chapter 321C, Hawaii Revised Statutes
- Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, January 22, 2007
- Title VI of the Civil Rights Act of 1964
- Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988)
- Executive Order 13166 – Improving Access to Services for Persons with Limited English Proficiency
- The Age Discrimination Act of 1975
- Title II of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern)
- Violence Against Women Act (VAWA), 42 U.S.C. §1432d
- Hawaii Revised Statutes (HRS) Chapter 515 and Chapter 321C
- Hawaii Administrative Rules (HAR) Title 12, Chapter 46, Subchapter 20

Any applicable State laws or local ordinances and any legislation protecting individual rights of tenants, applicants or staff that may subsequently be enacted.

The PHA shall not discriminate because of race, color, sex, religion, marital status, creed, national or ethnic origin, age, familial status, history of domestic violence or stalking, gender identity or expression, sexual orientation, handicap or disability or HIV infection in the leasing, rental, or other disposition of housing or related facilities, including land, that is part of any project or projects under the HPHA's jurisdiction covered by a contract for annual contributions under the United States Housing Act of 1937, as amended, or in the use or occupancy thereof.

Posters and housing information are displayed in locations throughout the HPHA's office in such a manner as to be easily readable from a wheelchair.

To further its commitment to full compliance with applicable Civil Rights laws, the PHA will provide Federal/State/local information to public housing residents regarding "discrimination" and any recourse available to them if they believe they are victims of discrimination. Such information will be made available to them during the resident orientation session.

The PHA's Compliance Office is accessible to persons with disabilities. Accessibility for the hearing impaired is provided by the TDD telephone service provider.

The PHA shall not, on account of race, color, sex, religion, marital status, creed, national or ethnic origin, age, familial status, history of domestic violence or stalking, gender identity or expression, sexual orientation, handicap or disability, or HIV infection:

- Deny to any family the opportunity to apply for housing, nor deny to any qualified applicant the opportunity to lease housing suitable to its needs;
- Provide housing that is different from that provided to others;
- Subject a person to segregation or disparate treatment;
- Restrict a person's access to any benefit enjoyed by others in connection with the housing program;
- Treat a person differently in determining eligibility or other requirements for admission; or
- Deny a person access to the same level of services.

The HPHA shall not automatically deny admission to a particular group or category of otherwise qualified applicants (e.g., families with children born to unmarried parents, elderly families with pets).

Fair Housing Goal: ADDRESSING DISCRIMINATION COMPLAINTS: PROCEDURES FOR PROGRAMS AND SERVICES

A. Grievance Procedure for Tenants and Program Participants

For residents and participants of HPHA's programs and services, the HPHA has established grievance procedures to address complaints regarding, among other things, discrimination or discriminatory practices, including the failure to provide language access.

1. HPHA's federal public housing residents may avail themselves of the grievance procedure if the HPHA's action or inaction in any way causes them to be adversely affected in a discriminatory way. (Chapter 17-2028, Hawaii Administrative Rules and Chapter 13 of the Admissions and Continued Occupancy Policy for the Federally Assisted Low-income Public Housing Program).

2. Tenant-based Section 8 participants may avail themselves of the informal review and hearing procedure if the HPHA's action or inaction in any way causes them to be adversely affected in a discriminatory way. (Informal Reviews and Hearings, Chapter 16, Part III, Administrative Plan for Section 8 – Housing Choice Voucher Program). In addition, an applicant or participant may submit a discrimination complaint to the HPHA in accordance with Section 2-I.B. of the Administrative Plan.

B. Complaint Procedure for Applicants and Participants of Programs and Services

This complaint procedure is established to meet the requirements of the Americans with Disability Act (ADA), Section 504 of the Rehabilitation Act, the Fair Housing Act, and to address language access. This complaint procedure may be used by anyone who wishes to file a complaint alleging discrimination, including the provision of language assistance service to Limited English Proficient individuals, or other violation in policies or the provision of services, activities, programs, or benefits by the HPHA.

1. Applicants and potential applicants for programs and services who believe they have been discriminated against, may file a formal complaint with the HPHA Compliance Office. The complaint should be in writing and contain information about the alleged discrimination and/or violation with the complainant's name, address, and phone number. Alternative means of filing complaints, such as personal interviews will be made available to persons with disabilities upon request.

2. The complainant should submit the complaint as soon as possible but no later than 30 working days using the "Discrimination Complaint Form" (Appendix A), after the most recent incident of alleged violation to the Chief Compliance Officer, along with a completed consent form (Appendix B).

This form replaces Department of Human Service Discrimination Complaint Form. Complaint forms not filed on a timely basis may be considered on a case-by-case basis with good cause. A "Notice to Persons Filing Complaints" shall be given to each complainant (Appendix E).

Upon receipt of the completed consent form, the Chief Compliance Officer or designee will provide written notice of the complaint to those individuals alleged to have taken discriminatory action against the complainant, and will notify the complainant that such notice was made.

3. Within 15 working days after receipt of the complaint, the Chief Compliance Officer or a designee will meet with the complainant either in person or over the phone to discuss the complaint and possible resolutions. The Chief Compliance Officer or designee may obtain information from other individuals with apparent knowledge or information about the Complainant's allegations, if consent is given.

Within 15 working days after the meeting, the Chief Compliance Officer or a designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audiotape. The response will explain the position of HPHA and offer options for substantive resolution of the complaint. If the investigation confirms that discrimination occurred, HPHA will take immediate corrective action.

4. If the response of the Chief Compliance Officer or a designee does not satisfactorily resolve the issue, the complainant may appeal the decision within 15 working days after receipt of the response, in writing to the Executive Director of HPHA. The appeal must state the reason(s) for dissatisfaction with the response given to the complainant.

Within 15 working days after receipt of the appeal, the HPHA Executive Director will meet with the complainant in person or by phone to discuss the complaint and possible resolutions. Within 15 working days after the meeting the HPHA Executive Director will respond in writing, and where appropriate, in a format accessible to the complainant, with a final resolution of the complaint. The Executive Director's decision shall be final and binding within HPHA's purview.

5. The Executive Director or a designee, Chief Compliance Officer or designee may change the time limits stated in the Complaint Procedure after consultation with the complainant or for good cause as determined by the Executive Director or Designee, Chief Compliance Officer or Designee.

6. The complainant may withdraw their complaint at any time by completing the Complaint Withdrawal Form (Appendix C).

C. Non-Retaliation for Exercising Right to Complain

1. Any retaliation or discriminatory action should be reported by the complainant to the Compliance Office. The Executive Director is responsible for ensuring that there is no retaliation for making a complaint. Any allegations of retaliation will be investigated by appropriate personnel staff under the direction of the Executive Director.

Fair Housing Goal: OTHER AVENUES OF REDRESS FOR DISCRIMINATION COMPLAINTS

	A. The complainant retains the right to other avenues of redress and may file a complaint by contacting the appropriate agency listed below. The complainant is responsible for meeting the agency's filing procedures and time requirements for filing the complaint. Hawaii Civil Rights Commission Keelikolani Building 830 Punchbowl Street, Room 411 Honolulu, Hawaii 96813 U.S. Department of Housing and Urban Development, Honolulu Field Office 1132 Bishop St., Suite 1400 Honolulu, Hawaii 96813 B. The Chief Compliance Officer is the State Fair Housing Officer, HPHA Section 504 Coordinator, HPHA Language Access coordinator, and HPHA ADA Coordinator. If anyone has questions or requires additional information, call the HPHA Compliance Office.
	Fair Housing Goal: CONFIDENTIALITY All written documents, evidence and discussions relating to the informal or formal complaint shall be kept confidential, unless otherwise stated. Witnesses and others involved in the investigation shall be directed to maintain the confidentiality of the allegation and investigation.

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. (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))

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

B. Plan Elements. All PHAs must complete this section.

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

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" 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 and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and 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 groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

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

☐ **Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.** 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 (24 CFR §903.7(l)). Provide 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 subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))

☐ **Safety and Crime Prevention (VAWA).** 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. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements 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:

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 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: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

☐ **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: 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, 5) the number of units affected and; 6) expiration date of the designation of any HUD approved plan. **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 under the Voluntary or Mandatory Conversion programs.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

☐ **Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

☐ **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 and Notice PIH-2017-03.](#) (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 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.
- C.5 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. Include dates in the description and most recent revisions of these documents as attachments. 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](#))

D. Affirmatively Furthering Fair Housing (AFFH).

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

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

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 7.52 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.