

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

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.
	PHA Name: <u>East Baton Rouge Parish Housing Authority</u> PHA Code: <u>LA 003</u> PHA Type: ☒ Standard PHA ☐ Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/2023</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>852</u> Number of Housing Choice Vouchers (HCVs) <u>4,461</u> Total Combined Units/Vouchers <u>5,313</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. EBRPHA draft plans and policy revisions are posted on the following platforms. Agency’s website at www.ebrpha.org EBRPHA Central Office: 4731 North Boulevard, Baton Rouge, LA 70806 Housing Communities: • Turner Plaza - 4546 North St, Baton Rouge, LA 70806 • Ardenwood Village - 1957 North Ardenwood, Baton Rouge, LA 70806 • Capital Square - 700 N 17th St, Baton Rouge, LA 70802 • Clarksdale - 801 Swan Street, Baton Rouge, LA 70807 • Duane Street - 1701 Duane St, Baton Rouge, LA 70802 • Kelly Terrace - 999 Rosenwald Road, Baton Rouge, LA 70807 • Monte Sano 3002 E. Mason Ave., Baton Rouge, LA 70805 • Wood Plaza 9990 Avenue J, Baton Rouge, LA 70807 • Scotland Villa 10666 Scotland Ave, Baton Rouge, LA 70807 • Zion Terrace 5958 Cadillac St, Baton Rouge, LA 70811

- Sharlo Terrace 4915 Alvin Dark Dr, Baton Rouge, LA 70820

☐ **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):

Statement of Housing Needs – The City-Parish Government in conjunction with Build Baton Rouge and the Louisiana Fair Housing Action Center completed an Analysis of Impediments to Fair Housing Choice in early 2020. The assessment provides a thorough analysis of the housing market in East Baton Rouge Parish. SEE FULL REPORT OF ASSESSMENT OF FAIR HOUSING 2020 ON THE CITY OF BATON ROUGE- PARISH OF EAST BATON ROUGE WEBSITE, www.brla.gov

13.21% of households experience severe housing cost burden (defined as greater than 50% of income), 29.22% experience at least one of the four housing problems, and 16.11% experience severe housing problems. Black Non-Hispanic and Hispanic face significantly higher rates of housing problems.

Public Housing developments where the majority of households are households with children are comprised of predominantly Black neighborhoods. On average, public housing developments are located in neighborhoods where the racial composition is 88% Black. Of these developments, the average neighborhood poverty rate is 38%, compared to a 19% poverty rate for the parish as a whole. Housing Choice Vouchers are highly concentrated in central Baton Rouge, which are also neighborhoods with predominantly Black residents. Black households represent the majority of HCV residents.

	Access to publicly supported housing for persons with disabilities is a significant contributing factor to disproportionate housing needs and segregation for persons with disabilities. Although persons with disabilities reside in most categories of publicly supported housing at rates that are commensurate with their share of the income-eligible population, they, like other disproportionately low-income groups, suffer from the overall lack of affordable housing in Baton Rouge and the surrounding region. The availability of affordable units in a range of sizes may contribute to disproportionate housing needs. In East Baton Rouge Parish, approximately 4% of renter occupied households are overcrowded (more than one person per room). Lack of safe, adequate and affordable housing continues to be the biggest issue facing the Baton Rouge area. According to maps in the Louisiana Housing Corporation's 2019 Housing Needs Assessment, notable housing problems in Baton Rouge are aging housing stock, overcrowding, inadequate rentals, and rent stress. <u>EBRPHA – Public Housing Waiting Lists</u> There are 8,163 applications on file for the Public Housing eleven site-based waiting lists. Many of the applicants are on multiple lists. As a result, total applicants are much lower than total applications. Individual lists will be reopened on an as needed basis. <u>EBRPHA – Housing Choice Voucher program waiting lists</u> • EBRPHA HCV waiting list – 3,216 applicants • City of Plaquemine HCV waiting list -1,388 applicants • HCV site-specific Project Based Voucher (PBV) waiting lists: • Autumn Place – 1,102 applicants • Cypress Pinchback – 295 applicants • River South 1 – 882 applicants • River South 2 – 1,000 applicants • Roosevelt Terrace – 735 applicants • Willow Creek – 1,115 applicants Strategies for Addressing Housing Needs: • Maximize the number of affordable units available to the PHA within its current resources • Increase the number of affordable housing units • Leverage funding for new development of affordable housing • Encourage voucher holders to rent in areas of opportunity • HCV Landlord seminars • RAD conversion of Public Housing portfolio SEE EBRPHA 2021-2025 FIVE-YEAR PLAN Financial Resources: FY 2023 funding and estimates increased from \$43,066,027 (FY 22) to \$46,260,646 (FY23) Rent Determination: HCV program received a waiver of Payment Standards to 120% of FMR through December 31, 2023. Additionally, waiver was granted allowing PHA to implement increased payment standards in advance of annual recertification date. Operations and Management: • Public Housing and Housing Choice Voucher programs will implement program changes as required under NSPIRE and HOTMA regulations. Homeownership – The EBRPHA operates an HCV Homeownership Program and currently looking at the feasibility of converting Wood Plaza, Capital Square and Scotland Villa into homeownership opportunities under Section 32. (c) The PHA must submit its Deconcentration Policy for Field Office review.
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.

Choice Neighborhoods: The EBRPHA was awarded a \$29.5M Choice Neighborhood Grant in September 2019 to implement its "BR Choice" initiative that will revitalize EBRPHA's Ardenwood Village (93 family units) and the surrounding Baton Rouge neighborhoods. The \$29.5 million will be invested into Housing (\$21.8 million), Neighborhood & Administration (\$3 million), Supportive Service (\$3 million), and Demolition (\$1.7 million). The initiative targets an approximately 1.6 square mile area of two adjoining neighborhoods at the heart of north Baton Rouge - Smiley Heights and Melrose East.

People: Implementing coordinated supportive services and programming to assist families within the Ardenwood Village Community to respond to their needs. Providing a network of strong partnerships helping families create an enriched social, educational, artistic and wellness environment appropriate for a 21st Century community.

Housing: The new mixed-income housing will be constructed in four phases. EBRPHA is committing PBV's within each CNI housing phase.

Phase I of the new construction community, Cypress at Ardenale will consist of 170 units of two and three story walk-up apartments and townhome style apartments for families. The community will be financed through public and private financing sources that include 4% LIHTC tax credits and supplemental funding from the East Baton Rouge City-Parish, Louisiana Housing Corporation and Louisiana Office of Community Development. The development is scheduled to close in Q3 2023.

Phase II, Cypress at Ardenale Senior, will consist of 70 units in a four-story elevator building for seniors 62 and older. The community will be financed through public and private financing sources that include 9% LIHTC tax credits and supplemental funding from the Louisiana Housing Corporation. The development is scheduled to close in Q1 2024.

Phase III (134-units of family housing) and Phase IV (60 units of family housing) are planned to submit 4% and 9% LIHTC funding applications within FY 23.

Neighborhood: The neighborhood strategy includes four primary objectives

- Bridging the digital divide
- Creating sustainable healthy neighborhoods
- Providing early learning opportunities
- Placemaking Initiatives using art as a revitalization tool

Units with Approved Vacancies for Modernization. We are working on modernization activities to interior dwelling units to prepare the units for occupancy as part of our vacancy reduction plan.

Mixed Finance Modernization or Development:

Cypress River Lofts –Predevelopment activities continue with the 19-unit family deal in Old South Baton Rouge adjacent to the River South LIHTC site. The community will be 100% subsidized with PBV and anticipated to close in Q3 2023

Residences at Northview – The site is currently owned by EBRPHA, existing office buildings are being occupied by EBRPHA. The development plan will add two fourplexes in the current parking area. The location is within walking distance of BRCC's main campus on North Foster Drive and will create a potential live, work and learn community for faculty and staff.

	Demolition and/or Disposition: Turner Plaza – EBRPHA is pursuing a transfer of assistance from Turner Plaza (187 units) and Sharlo Terrace (78 units), all elderly/disabled single, through the RAD program. It is anticipated that a demolition and/or disposition application will be submitted in conjunction with the RAD program. Upon approval, the EBRPHA will apply for Tenant Protection Vouchers. Clarksdale – The property is being considered for disposition to Southern University Lab school for its expansion or potential redevelopment under the RAD program, the initial concept plan includes student housing as well as mixed-income housing directly across from Southern University and Southern University Lab School. If disposition is chosen it will be completed with one of the following methods: i) negotiated sale at FMV ii) Negotiated Sale at below FMV Cypress River Lofts - The State of LA, Dept of Transportation & Development expropriated two EBRPHA Oklahoma Street parcels to facilitate interstate expansion. Vacant land - EBRPHA HOPE VI scattered vacant land in the Old South Baton Rouge area of East Baton Rouge Parish . The sites have potential for future rental and homeownership opportunities. Conversion of Public Housing to RAD: Turner Plaza – EBRPHA is pursuing a transfer of assistance for Turner Plaza (187 units) and Sharlo Terrace (78 units), all elderly/disabled single, through the RAD programs. It is anticipated that a demolition and/or disposition application will be submitted in conjunction with the RAD program. Upon approval, the EBRPHA will apply for Tenant Protection Vouchers. Our North Pointe Senior and Wards Creek development will have senior components that will include RAD replacement units. EBRPHA will also pursue acquisitions to assist with replacement housing needs, Clarksdale – The property is being considered for disposition to Southern University Lab school for its expansion or potential redevelopment under the RAD program, the initial concept plan includes student housing as well as mixed-income housing directly across from Southern University and Southern University Lab School. If disposition is chosen it will be completed with one of the following methods: i) negotiated sale at FMV ii) Negotiated Sale at below FMV. Duane St. – Historic tax credits are being pursued to finance the rehab of the 29-unit family community. North Pointe Senior - EBRPHA is in the process of acquiring the ELK site to implement its mixed-use redevelopment plan. Phase I will consist of approximately 115 units for seniors. A portion of the units will be designated as RAD replacement units for Sharlo and/or Turner Plaza. Cypress at Wards Creek - EBRPHA is in the process of acquiring 4550 and 4560 North Blvd, the acquisition is anticipated to be completed in Q4 22. Phase I of the redevelopment plan will consist of approximately 65 units for seniors. A portion of the units will be designated as RAD replacement units for Sharlo and/or Turner Plaza. Faircloth to RAD Conversion – EBRPHA is completing due diligence on the new guidance issued by HUD to submit a Fair Cloth to RAD application. Project- Based Vouchers: The EBRPHA has increased its voucher allocation to 4461 including 101 VASH vouchers. In addition, the PHA was awarded 64 Emergency Housing Vouchers in 2021. Due to increased funding to the HCV program, the PHA plans to issue a significant number of vouchers this year, including providing vouchers, where needed towards its RAD transfer of assistance strategies. The PHA is targeting a utilization rate of 98-100%. EBRPHA is also looking into the possibility of allowing third party property management firms to manage their own site-based waiting list instead of the list being managed internally. Project-Based Vouchers. Units with Approved Vacancies for Modernization. We are working on modernization activities to interior dwelling units to prepare the units for occupancy as part of our vacancy reduction plan.
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. The EBRPHA Choice Neighborhood Initiative Implementation Grant including AMP LA003000004, Ardenwood Village, a 93-unit family community is detailed in Section B2, New Activities. Cypress at Ardendale Phase I, new construction of a 170-unit family property is scheduled to close on the financial transaction in Q3 2023 with construction to begin shortly thereafter. The EBRPHA has increased its voucher allocation to 4461 including 101 VASH vouchers. In addition, the PHA was awarded 64 Emergency Housing Vouchers in 2021. Due to increased funding to the HCV program, the PHA plans to issue a significant number of vouchers this year. The PHA is targeting a utilization rate of 98-100%. A HUD Resident Opportunities and Self Sufficiency Grant was received to employ a coordinator to coordinate services/programs for Public Housing residents in efforts to reach self-sufficiency. Grant funds are set to expire in July 2023, we are seeking to reapply for additional grant funds to continue the program. Community Gardens were installed at all EBRPHA communities.

	The EBRP School System Home Start Program was implemented at our family communities
B.4	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. The 2022-2026 Five Year Action Plan was approved on March 16, 2022.
B.5	Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y N ☒ ☐ (b) If yes, please describe: 2022-001 Financial Reporting Recommendation: The Authority should evaluate their financial reporting processes and controls to determine whether additional controls over the preparation of annual financial statements can be implemented to provide reasonable assurance that financial statements are prepared in accordance with U.S. GAAP. We recommend the Authority review their current procedures for reconciliations and year end close procedures and evaluate the number of staff assigned to various accounting functions to ensure that staffing is appropriate. Explanation of disagreement with audit finding: There is no disagreement with this audit finding. Action taken in response to finding: EBRPHA's Finance Department was hit hard with three top Finance positions being vacated due to retirement, which left remaining staff and the agency with no HUD experience for Accounting and compliance. A new CFO started mid -June 2023 and will work with team to implement better practices, controls and training. 2022-011 Delay in Issuance of Financial Reporting Recommendation: The Authority should review staffing to ensure there is enough staffing to meet the demands of financial reporting. Explanation of disagreement with audit finding: There is no disagreement with this audit finding. Action taken in response to finding: EBRPHA's Finance Department was hit hard with three top Finance positions being vacated due to retirement, which left remaining staff and the agency with no HUD experience for Accounting and compliance. A new CFO started mid -June 2023 and will work with team to implement better practices, controls and training. 2022-002, 2021-001 Special Tests – HQS Enforcement - Housing Voucher Cluster – Assistance Listing No. 14.871 Recommendation: We recommend that management review their controls for conducting follow up inspections on initially failed home inspections and ensure compliance standards are met. Explanation of disagreement with audit finding: There is no disagreement with the audit finding. Action taken in response to finding: Reviewed policies and procedures with Director of HQS Compliance and inspections staff to ensure compliance. 2022-003 Special Tests – Top of the Waiting List - Housing Voucher Cluster – Assistance Listing No. 14.871 Recommendation: We recommend that the Authority reviews their standard procedures to ensure requests for informal reviews are granted and notified to the applicant within 30 days of the receipt of the request. Explanation of disagreement with audit finding: There is no disagreement with the audit finding. Action taken in response to finding: The Housing Authority has hired a dedicated Hearing Officer so that hearings and reviews are held in a timely manner. 2022-004 Eligibility - Housing Voucher Cluster – Assistance Listing No. 14.871 Recommendation: We recommend that management review their controls over recertifications and ensure compliance standards for eligibility of tenants are met. Explanation of disagreement with audit finding: There is no disagreement with the audit finding. Action taken in response to finding: During annual recertification, staff double-check files to ensure that all required documents are in the file. If any forms are missing staff contact the family to rectify. Files are also audited at random during Quality Control review to ensure compliance. Name(s) of the contact person(s) responsible for corrective action: Janie Anderson, VP Housing Voucher Cluster Planned completion date for corrective action plan: September 30, 2023 2022-005 Reporting – PIC - Housing Voucher Cluster – Assistance Listing No. 14.871 Recommendation: We recommend that the Authority reviews their standard procedures to ensure the proper forms are submitted to the PIC system.

	Explanation of disagreement with audit finding: There is no disagreement with the audit finding. Action taken in response to finding: Staff reviews and corrects PIC errors as needed. Some of the issues are related to current software limitations. The Housing Authority is in the process of converting to Yardi Software Solutions which will help ensure timely submission of all action types. 2022-006 Special Tests – Reasonable Rent Changes - Housing Voucher Cluster – Assistance Listing No. 14.871 Recommendation: We recommend that the Authority reviews its procedures to ensure controls over the reasonable rent process. Explanation of disagreement with audit finding: There is no disagreement with the audit finding. Action taken in response to finding: We revised our procedures in 2023 so that decision letters are sent to the landlord and tenant timely. 2022-007 Allowable Activities and Costs - Housing Voucher Cluster – Assistance Listing No. 14.871 Recommendation: We recommend the Authority reviews the established internal control procedures over charging expenses to programs and ensure the policies are followed for all expenses charged to the program. Additionally, we recommend that the Authority reviews the payroll procedures to ensure all timesheets are approved prior to payment. Explanation of disagreement with audit finding: There is no disagreement with the audit finding. Action taken in response to finding: Finance Dept lost 3 key positions. New CFO in place now for two weeks and will implement allocation for all expenses and procedure to oversee that all transactions are recorded properly and have sufficient backup. Will work with HR and Payroll Staff Accountant to implement required authorization before processing. 2022-008 Allowable Activities and Costs - Public and Indian Housing – Assistance Listing Number 14.850 Recommendation: We recommend the Authority reviews the established internal control procedures over charging expenses to programs and ensure the policies are followed for all expenses charged to the program. Additionally, we recommend that the Authority reviews the payroll procedures to ensure all timesheets are approved prior to payment. Explanation of disagreement with audit finding: There is no disagreement with the audit finding. Action taken in response to finding: Finance Dept lost 3 key positions. New CFO in place now for two weeks and will implement allocation for all expenses and procedure to oversee that all transactions are recorded properly and have sufficient backup. Will work with HR and Payroll Staff Accountant to implement required authorization before processing. 2022-009 Procurement and Suspension and Debarment - Public and Indian Housing – Assistance Listing No. 14.850 Recommendation: We recommend that the Authority reviews it's procurement policy and active contracts and future contracts to ensure that all policies and procedures regarding procurement of contracts are properly followed and documented. Explanation of disagreement with audit finding: There is no disagreement with the audit finding. Action taken in response to finding: 2022-010 Public and Indian Housing – Assistance Listing No. 14.850 Recommendation: We recommend the Authority establish procedures to properly reconcile the revolving fund cash account to ensure that cash and interprogram accounts are properly reported at the program level. Explanation of disagreement with audit finding: There is no disagreement with the audit finding. Action taken in response to finding: As previously mentioned with turnover and staff in place that had never dealt with reconciling interfunds, will put protocols in place to be done monthly, quarterly and final review before FDS submission.
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 There were no comments from RAB. ☐ ☒ (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 ☐ ☒ There were no challenged elements. 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. <table border="1" data-bbox="181 1037 1453 1488"> <tr> <td data-bbox="181 1037 1453 1077">Fair Housing Goal:</td></tr> <tr> <td data-bbox="181 1077 1453 1488"><u>Describe fair housing strategies and actions to achieve the goal</u></td></tr> </table> <table border="1" data-bbox="181 1512 1453 1919"> <tr> <td data-bbox="181 1512 1453 1551">Fair Housing Goal:</td></tr> <tr> <td data-bbox="181 1551 1453 1919"><u>Describe fair housing strategies and actions to achieve the goal</u></td></tr> </table>	Fair Housing Goal:	<u>Describe fair housing strategies and actions to achieve the goal</u>	Fair Housing Goal:	<u>Describe fair housing strategies and actions to achieve the goal</u>
Fair Housing Goal:					
<u>Describe fair housing strategies and actions to achieve the goal</u>					
Fair Housing Goal:					
<u>Describe fair housing strategies and actions to achieve the goal</u>					

	Fair Housing Goal:
	<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>

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.