

<b>Annual PHA Plan</b> <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 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	<p> <b>PHA Name:</b> <u>Independence Housing Authority</u> <b>PHA Code:</b> <u>MO017</u>  <b>PHA Type:</b> <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA  <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>04/2024</u>  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  <b>Number of Public Housing (PH) Units</b> <u>528</u> <b>Number of Housing Choice Vouchers (HCVs)</b> <u>1,656</u> <b>Total Combined Units/Vouchers</b> <u>2,184</u>  <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission         </p> <p> <b>Availability of Information.</b> PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.         </p> <p> <input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)         </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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B.	Plan Elements
B.1	<p><b>Revision of Existing PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</li> <li><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</li> <li><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</li> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</li> <li><input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management.</li> <li><input checked="" type="checkbox"/> <input type="checkbox"/> Grievance Procedures.</li> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</li> <li><input checked="" type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency Programs.</li> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</li> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</li> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</li> <li><input checked="" type="checkbox"/> <input type="checkbox"/> Substantial Deviation.</li> <li><input checked="" type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</li> </ul> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>In the upcoming fiscal year, IHA will implement a variety of strategies to address the shortage of affordable housing as reflected in the below waiting list statistics and in the attached Statement of Housing Needs. IHA’s strategies emanate from the Agency’s 5-Year Plan goals and objectives and are aligned with HUD’s strategic framework. They are also consistent with the City of Independences’ Consolidated Plan and the State of Missouri Consolidated Plan.</p> <p>Core strategies include: maximizing affordable housing opportunities through continuous program improvements and management efficiencies; leveraging additional resources to replace public housing units and implement mixed-finance, mixed-income redevelopment; and generating new housing opportunities by applying for additional vouchers should they become available – including special purpose vouchers for targeted groups such as the elderly, disabled, veterans, homeless and foster youth.</p> <p>IHA plans to revise its preferences to include a local preference for applicants who live, work or attend educational or job training in Jackson County. Current preferences for Elderly or Disabled, Homeless, Veteran and Displaced by Natural Disaster will not be removed.</p> <p>IHA will also be reviewing its option to look for funding to renovate all three properties and reclassify or merge some of its OBR units in both developments in AMP001, which includes 159 – OBR units at Pleasant Heights, which is an 8-story building along with 2 – OBR units at Hocker Heights, which is a family site. It is the intention of merging 2 – OBR units together for the most part, but some are aligned beside a 1BR unit that will create additional 2BR units for this property. The current layout for Pleasant Heights is 176 – OBR units; 56 -1BR units; 9 – 2BR units. Any units count reduction will be put in a Conversion Awaiting Transfer and used in future acquisition or development.</p> <p>IHA plans to update ADMIN and ACOP policies to be compliant with Federal Regulation regarding changes in NSPIRE inspections, HOTMA provisions, and Small Area Fair Market Rent changes. Changes will be in place by October 2024.</p> <p>IHA added required VAWA language to the ADMIN plan including regulatory citation: 24 CFR 5.2007(a)(2)(i) which states that if an applicant or tenant does not provide the documentation requested under paragraph (a)(1) of this section within 14 business days after the date that the tenant receives a request in writing for such documentation from the covered housing provider, nothing in § 5.2005 or § 5.2009, which addresses the protections of VAWA, may be construed to limit the authority of the covered housing provider to:</p> <ul style="list-style-type: none"> <li>a) Deny admission by the applicant or tenant to the covered housing program.</li> <li>b) Deny assistance under the covered housing program to the applicant or tenant.</li> <li>c) Terminate the participation of the tenant in the covered housing program; or</li> <li>d) Evict the tenant, or a lawful occupant that commits a violation of a lease &amp; 34 U.S.C. 12491(c)(2)(A)</li> </ul> <p>IHA has restarted the Resident Opportunity and Self-Sufficiency program utilizing the remainder of the previous grant. The agency has hired a full-time ROSS Coordinator and is trying to garner additional funding through an upcoming grant that will also cover the position into the RAD Conversion.</p> <p>U.S. Department of Housing and Urban Development (HUD) statute, Public and Indian Housing (PIH) Notice 99-51, requires that public housing authorities explain “substantial deviations” from the 5-Year Plan in their Annual Plans. The statute also provides that, while public housing authorities may change or modify their plans or policies described in them, any “significant amendment or modification” to the plan would require public housing authorities to submit a revised PHA Plan that has met full public process requirements. PLHA is amending its definition of Significant Amendment, Modification or Substantial Deviation Definition:</p> <p>The Independence Housing Authority hereby defines “substantial deviation” and “significant amendment/ modification” as any change in policy which significantly and substantially alters the Authority’s stated mission and the persons the Authority serves. This would include admissions preferences, demolition and/or disposition activities, and conversion programs not already identified in this plan. Discretionary or administrative amendments consistent with the Authority’s stated overall mission and basic objectives will not be considered substantial deviations or significant modifications. If a significant amendment and/or substantial deviation/modification occur, the public process will include: consultation with the</p>

Resident Advisory Board, a public comment period, public notification of where and how the proposed change can be reviewed, and the approval by the Housing Authority Board.

The Housing Authority of the City of Independence, MO is also including its definition of substantial deviation to the PHA Plan to include the following language:

**Substantial Deviation Amendment**

As part of the Rental Assistance Demonstration (RAD)/ Section 18 Conversion, Housing Authority of the City of Independence, MO is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD/ Section 18 Conversion-specific items:

- a) The decision to convert to Project Based Voucher Assistance;
- b) Changes to the Capital Fund Budget produced as a result of each approved RAD/Section 18 Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- c) Changes to the Relocation Plan and processes for each approved RAD/ Section 18 conversion;
- d) Changes to the Section 18 Disposition Plan and/or application for units identified in this plan.
- e) Changes to the construction and rehabilitation plan for each approved RAD/ Section 18 conversion; and
- f) Changes to the financing structure for each approved RAD conversion

**Significant Amendment/ Modification**

IHA will amend or modify its agency plan upon the occurrence of any of the following events during the first nine months of the term of an approved plan:

- a) A federal statutory or regulatory change is made effective and, in the opinion of the Authority, has either substantial programmatic or financial effects on the programs administered by IHA, or creates substantial obligations or administrative burdens beyond the programs under administration at the start of the Plan year.
- b) Proposed demolition, disposition, homeownership, Capital Fund Financing, development, or mixed finance proposals not already identified in this plan and those that are considered by HUD to be significant amendments to the Agency Plan and CFP 5 Year Action Plan.
- c) Any Capital Fund project not already in the Five-Year Action Plan excluding projects arising out of federally declared major disasters, acts of God beyond the control of the Authority, such as earthquakes, fire and storm damages, civil unrest, or other unforeseen significant event or changes in use of replacement reserve funds under the Capital Fund in the amount of 20% or more of the annual grant.
- d) Any other event that the IHA’s Board determines to be a significant amendment or modification of the approved annual plan.

The following table provides an overview of the housing needs in Independence and Jackson County that IHA aims to address through implementation of the aforementioned core strategies.

<b>INDEPENDENCE HOUSING AUTHORITY HOUSING NEEDS STATEMENT: FY 04/01/2024 PHA ANNUAL PLAN</b>			
<b>HUD 2023 COMPREHENSIVE HOUSING ASSESSMENT SURVEY (CHAS) USING U.S. CENSUS AMERICAN COMMUNITY SURVEY (ACS) 2016-2020 JACKSON COUNTY, MO DATASET</b>			
<b>Total Jackson County Households</b>	291,530		
Owner Households	170,400 (58% of Total)		
Renter Households	121,135 (42% of Total)		
<b>Jackson County Renter Households by Average Median Income (AMI) with Breakout of “Low Income Renter” Households</b>		<b>Statistical Notations</b>	
<b>Extremely Low Income</b> renter households (<=30% AMI)	33,955	Of the total 121,335 Renter Households in Jackson County, 84,325 or 69% are classified as “Low Income” Renter Households	
<b>Very Low Income</b> renter households (>30% but <= 50% AMI)	24,765		
<b>Low Income</b> renter households (>50% but <= 80% AMI)	<u>25,405</u>		
<b>Subtotal “Low Income Renter” Households (&lt;=80% AMI)</b>	<b>84,325</b>		
Other renter households (>80% but <= 100% AMI)	12,805		
Other renter households (>100% AMI)	<u>24,205</u>		
<b>Subtotal Other Renter Households (&gt;80% AMI)</b>	<b>37,010</b>		
<b>Total Renter Households:</b>	<b>121,335</b>		
Low Income Renter Households with Severe Housing Problems (of total 121,335)	<b>29,070</b>		Of the 84,325 Low Income Renters, 29,070 households have severe housing problems or 34%.
Low Income Renter Households with Housing Problems (of total 121,335)	<b>54,620</b>		Of the 84,325 Low Income Households, 54,620 “Households are having Housing Problems or 65%.

<p><b>COST BURDEN:</b></p> <p>Moderate cost burden is “rent compromising more than 30 percent of income”. Severe cost burden is “rent compromising more than 50% of income”</p>	<p>Cost Burden less than or = to 30% : 66,690 Renters</p> <p>Moderate Cost Burden greater than 30% but less than 50% : 26,320 Renters</p> <p>Severe Cost Burden greater than 50% : 25,250 Renters</p>
<p><b>HOUSING PROBLEMS:</b></p> <p>A household is said to have a housing problem if it has 1 or more of the 4 problems identified in the CHAS dataset: 1) housing units lacks complete kitchen facilities; 2) housing units lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened.</p>	<p>Renters with at least 1 of 4 problems = 54,620 Renters</p> <p>Renters with none of 4 problems = 66,515 Renters</p>

**INDEPENDENCE HOUSING AUTHORITY  
HOUSING NEEDS STATEMENT: FY 04/01/2024 PHA ANNUAL PLAN**

**HUD 2023 COMPREHENSIVE HOUSING ASSESSMENT SURVEY (CHAS)  
USING U.S. CENSUS AMERICAN COMMUNITY SURVEY (ACS) 2016-2020  
INDEPENDENCE, MO DATASET**

<b>Total Independence Households</b>	48,835	
Owner Households	28,990 (59% of Total)	
Renter Households	19,845 (41% of Total)	

<b>Independence Renter Households by Average Median Income (AMI) with Breakout of “Low Income Renter” Households</b>	<b>Statistical Notations</b>	
<p><b>Extremely Low Income</b> renter households (&lt;=30% AMI) 5,545</p> <p><b>Very Low Income</b> renter households (&gt;30% but &lt;= 50% AMI) 4,295</p> <p><b>Low Income</b> renter households (&gt;50% but &lt;= 80% AMI) 4,500</p> <p><b>Subtotal “Low Income Renter” Households (&lt;=80% AMI) 14,340</b></p>	<b>14,340</b>	Of the total 19,845 Renter Households in Independence, or <b>72%</b> are classified as “Low Income” Renter Households
<p>Other renter households (&gt;80% but &lt;= 100% AMI) 2,115</p> <p>Other renter households (&gt;100% AMI) 3,385</p> <p><b>Subtotal Other Renter Households (&gt;80% AMI) 5,500</b></p>		
<p><b>Total Renter Households: 19,845</b></p>		
Low Income Renter Households with Severe Housing Problems (of total 19,845)	<b>4,725</b>	Of the 14,340 Low Income Renter Households, 4,725 have Severe housing problems or 33%.
Low Income Renter Households with Housing Problems (of total 19,845)	<b>8,600</b>	Of the 14,340 Low Income Renter Households, 8,600 Households are having Housing Problems or 60%.

<p><b>COST BURDEN:</b></p> <p>Moderate cost burden is “rent compromising more than 30 percent of income”. Severe cost burden is “rent compromising more than 50% of income”</p>	<p>Cost Burden less than or = to 30% : 11,375 Renters</p> <p>Moderate Cost Burden greater than 30% but less than 50% : 4,185 Renters</p> <p>Severe Cost Burden greater than 50% : 3,910 Renters</p>
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<p><b>HOUSING PROBLEMS:</b></p> <p>A household is said to have a housing problem if it has 1 or more of the 4 problems identified in the CHAS dataset: 1) housing units lacks complete kitchen facilities; 2) housing units lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened.</p>	<p>Renters with at least 1 of 4 problems = 8,600 Renters</p> <p>Renters with none of 4 problems = 11,245 Renters</p>
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## HCV TENANT-BASED ASSISTANCE WAITING LIST

### Housing Needs of Families on the Housing Choice Voucher (HCV) Waiting List

#### Waiting List Type: HCV Tenant-Based Assistance (2022 Waiting List)

	# of Families	% of Total Families
<b>Waiting List Total</b>	2,837	
<b>Extremely Low Income &lt;= 30% AMI</b>	2,437	86%
<b>Very Low Income (&gt;30% but &lt;= 50% AMI)</b>	329	12%
<b>Low Income (&gt;50% but &lt;=80% AMI)</b>	55	2%
<b>Over Income</b>	16	1%
<b>Families With Children</b>	1435	51%
<b>Elderly Families</b>	143	5%
<b>Families With Disabilities</b>	9	0%
<b>Characteristics by Bedroom Size</b>		
<b>0BR</b>	22	1%
<b>1BR</b>	1,501	53%
<b>2BR</b>	800	28%
<b>3BR</b>	416	15%
<b>4BR</b>	85	3%
<b>5BR</b>	13	0%
<b>5+ BR</b>	0	0%

## PUBLIC HOUSING WAITING LIST

### Housing Needs of Families on the Low-Income Public Housing (LIPH) Waiting List

#### LIPH Waiting List (2022 Waiting List)

	# of Families	% of Total Families
<b>Waiting List Total</b>	<b>94</b>	
<b>Extremely Low Income &lt;= 30% AMI</b>	<b>90</b>	<b>96%</b>
<b>Very Low Income (&gt;30% but &lt;= 50% AMI)</b>	<b>4</b>	<b>4%</b>
<b>Low Income (&gt;50% but &lt;=80% AMI)</b>	<b>0</b>	<b>0%</b>
<b>Over Income</b>	<b>0</b>	<b>0%</b>
<b>Families With Children</b>	<b>46</b>	<b>49%</b>
<b>Elderly Families</b>	<b>2</b>	<b>2%</b>
<b>Families With Disabilities</b>	<b>5</b>	<b>5%</b>
<b>Characteristics by Bedroom Size</b>		
<b>0BR</b>	<b>0</b>	<b>0%</b>
<b>1BR</b>	<b>69</b>	<b>73%</b>
<b>2BR</b>	<b>17</b>	<b>18%</b>
<b>3BR</b>	<b>8</b>	<b>9%</b>
<b>4BR</b>	<b>0</b>	<b>0%</b>

**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                                   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
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| <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

(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.

IHA developed an RFP for a Master Developer and chose Knight Development to begin moving forward with IHA's proforma and plans on the redevelopment of IHA's Low Income Public Housing units as well as creating additional Affordable Housing units. Various funding sources such as LIHTC, Home Loans, CDBG, etc. to assist in renovations of all three Public Housing developments will be applied for. IHA intends on applying for both Federal and State of MO LIHTC to assist with the housing authorities plans on redevelopment and conversion via RAD and voluntary streamlining, once we have our units below 250.

IHA and Developers sent in RAD application in June 2022. RAD CHAP approval letters were received on 9/19/2022 and correction letters were received on 9/27/2022 due to incorrect AMP numbers on the CHAP letters. The Hocker Heights project has completed the concept call and is waiting on demo/dispo application before submission of Financing Plan.

IHA intends to utilize project-based vouchers after the transition for all current public housing units. IHA also administers project-based vouchers with Drumm Farms for homeless youth and with Heritage House for elderly/disabled. IHA will continue the contracts and will add additional units to Drumm Farms HAP contract if allowed. Opportunities for additional use of PBV units in our jurisdiction will be evaluated and utilized to provide opportunities for voucher holders to establish housing in our communities.

Demolition / Disposition is being requested for Hocker Heights buildings D2 & C14 due to structural issues. Units will be held in a Conversion Awaiting Transfer (CAT) until acquisition or new construction in another location is approved.

IHA will continue to rehab units at developments with CFP funds, even if LIHTC and other GAP mixed-finance funding sources are not obtained immediately.

IHA will continue to go after ESSG grants and any other grant that can assist the Housing Authority in moving towards making these properties decent, safe and sanitary. IHA continues to improve security by having all community rooms and hallway lighting has been switched to LED so as there are no dark areas at night for the high-rise buildings. IHA has provided overnight security at one of the High-Rises and updated all camera systems to the cloud so as to gain additional recording times. 2<sup>nd</sup> High rise has cameras monitored offsite and hallways walked periodically as well as parking lots monitored. IHA will continue to apply for ESSG grants from HUD to add Cameras and Solar Lighting onto the properties to decrease dark areas, especially on the family site of 13.5 acres.

IHA has and will continue to review and revise the HCV Admin Plan and LIPH ACOP when needed or if any changes from HUD deems IHA to review and change these policies due to Statutory or Regulatory Changes. IHA will update ADMIN and ACOP with all required HOTMA, NSPIRE and Small Area FMR changes required.

IHA intends to merge or reclassify 0BR units at Pleasant Heights to create 1BR units or merge 0BR units with 1BR units to make 2 BR units in both developments of AMP001. Any removed units due from a merge of zero bedroom units will be maintained for future use and will be assigned to new construction or acquisition of new units along with adding the remainder of IHA's Faircloth Limit of 4 additional units.

The housing authority has been holding units vacant in anticipation of relocation during conversion. Several units have also become vacant due to casualties such as fires and floods. All units having casualty loss and all units under disposition through the RAD conversion will be taken offline as soon as possible to minimize the loss of funding to the agency.

IHA will be applying for CDBG, ESSG, HOME funds, and any other type of GAP funding to fill in gaps on renovation/new construction projects.

<p><b>B.3</b></p>	<p><b>Progress Report.</b></p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <ul style="list-style-type: none"> <li>IHA has continued to move forward with the redevelopment of the public housing stock and to transition in over to the Housing Choice Voucher program. The first phase with Hocker Heights has all the preliminary items completed. The concept call completed and are submitting the demolition request to SACS in December 2023. Relocation and renovation is slated to start in early 2024.</li> <li>IHA has submitted application for 4% Low Income Housing Tax Credits in relation to the conversion of Hocker Heights. The funding has been preliminarily approved.</li> <li>Increased security at all sites with the purchase and monitoring of extensive security cameras and patrols by security company</li> <li>Administered the Jobs Plus grant for four years during COVID providing much needed employment opportunities and outreach.</li> <li>Administered the ROSS program but lost staff during COVID. IHA has hired new coordinator and is moving forward with action plans and assessments to determine how best to focus resources to help residents.</li> <li>IHA has continued to make Fair Housing a priority and provided training to all staff yearly or more.</li> </ul>
<p><b>B.4</b></p>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. <b>The 2022-2026 5YR CFP Action Plan in EPIC was approved by HUD on 6/22/2022.</b></p>
<p><b>B.5</b></p>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N  <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(a) If yes, please describe: <a href="#">HQS Inspections – Multiple instances where failed HQS inspections did not have the proper support for the failed HQS inspections. IHA was using contract inspectors and not all paperwork was being obtained for reinspections of failed units.</a></p>
<p><b>C. Other Document and/or Certification Requirements.</b></p>	
<p><b>C.1</b></p>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(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.</p> <p><a href="#">Due to transition out of COVID-19 Pandemic and use of HUD waivers, the RAB and Resident Associations have not met in 2023. All activities had been shut down and IHA was utilizing the HUD PIH Notice Waivers for 2020-05, 2020-13, 2020-33 and 2021-14. All three Resident Council had disbanded prior to COVID-19 in 2020. IHA has hired a ROSS Coordinator who is reaching out to interested residents to begin the process of assembling Resident Councils at each site.</a></p>
<p><b>C.2</b></p>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</a>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p><b>C.3</b></p>	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p><a href="#">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</a>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p><b>C.4</b></p>	<p><b>Challenged Elements.</b> 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.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N</p>



	<input type="checkbox"/> <input checked="" type="checkbox"/> If yes, include Challenged Elements.
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<b>C.5</b>	<b>Troubled PHA.</b> (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y   N   N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>  (b) If yes, please describe:
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<b>D.</b>	<b>Affirmatively Furthering Fair Housing (AFFH).</b>
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<b>D.1</b>	<b>Affirmatively Furthering Fair Housing (AFFH).</b>  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.) <b>Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart.</b> 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.						
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	<p><b>Fair Housing Goal:</b></p> <p><u>Describe fair housing strategies and actions to achieve the goal</u></p>

## Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

- A. PHA Information.** All PHAs must complete this section. (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](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](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](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."

[See Capital Fund 2022-2026 5YR Action Plan in EPIC approved by HUD on 06/22/2022.](#)

**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.

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

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