

<b>Annual PHA Plan</b> <i>(Standard PHAs and Troubled PHAs)</i>	<b>U.S. Department of Housing and Urban Development</b> <b>Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226</b> <b>Expires: 03/31/2024</b>
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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>PHA Name: <u>Chattanooga Housing Authority</u> <span style="float: right;">PHA Code: <u>TN004</u></span>            PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA            PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/2024</u>            PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)            Number of Public Housing (PH) Units <u>1,386</u> Number of Housing Choice Vouchers (HCVs) <u>3,886</u>            Total Combined Units/Vouchers <u>5,637</u>            PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> PHAs must have the elements listed below 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><b>CHA 2024 Plan may be examined by the public in Chattanooga, TN at:</b></p> <ol style="list-style-type: none"> <li>1. <a href="http://www.Chattanooga.gov">www.Chattanooga.gov</a></li> <li>2. Chattanooga Bicentennial Library -1001 Broad St.</li> <li>3. Villages at Alton Park Leasing Office -3750 Hughes Ave.</li> <li>4. Oaks at Camden Leasing Office -1635 Dodson Ave.</li> <li>5. Maple Hills Leasing Office -2515 Gilbert St.</li> <li>6. Emma Wheeler Homes Leasing Office -4900 Edingburg Dr. #A</li> <li>7. Cromwell Hills Leasing Office -3940 Camellia Dr.</li> <li>8. Greenwood Terrace Leasing Office -3056 Dee Dr.</li> <li>9. East Lake Courts Leasing Office -2600 4<sup>th</sup> Ave.</li> <li>10. College Hill Courts Leasing Office -1300 Grove St. Ct.</li> <li>11. Boynton Terrace Leasing Office – 955 Boynton Dr.</li> <li>12. Gateway Tower Leasing Office -1100 Gateway Ave.</li> <li>13. Mary Walker Towers Leasing Office -2501 Market St.</li> <li>14. Dogwood Manor Leasing Office -959 Gateway Ave # 100</li> <li>15. CHA Central Office 801 North Holtzclaw Ave</li> <li>16. <a href="http://www.chahousing.org">www.chahousing.org</a></li> </ol>

**In addition to the above, the following Resident Councils have been provided access to this plan:**

- ★ Boynton Terrace
- ★ Greenwood/Scattered sites
- ★ Mary Walker Towers
- ★ College Hills Courts
- ★ Gateway Tower
- ★ Resident Advisory Board

**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):

**Deconcentration and Other Policies that Govern Eligibility and Admission:**

In 2023, Chattanooga Housing Authority (CHA) closed on the Rental Assistance Demonstration (RAD) project at Greenwood Terrace Apartments. This site will no longer be public housing, but will operate under the Project-Based Rental Assistance (PBRA) Program. The CHA may explore RAD opportunities at College Hill Courts, East Lake Courts, and Emma Wheeler Homes.

Additionally, if in 2023 or later, the CHA acquires the Villages at Alton Park, the Maple Hills Apartments, and the Oaks at Camden from Pennrose Development Company, it will consider converting one or more of these properties to PBRA through a RAD conversion.

**Financial Resources**

The CHA offers the following projected statement of Financial Resources for year-end 2023. The Statement of financial resources for 2023 may differ due to any proposed RAD conversions:

Category	Description	Amount
Public Housing		
	Subsidy & Rental	\$12,205,800
	Capital Fund Grant	5,173,512
	ROSS Grant	252,505
Project Based Rental Assistance (PBRA)		
	Subsidy & Rental	5,024,449

B.2	Housing Choice Voucher		
		HCV P-Voucher	29,121,761
		HCV P-Admin	2,471,728
	Other		
		Property Mgmt	311,387
		Other Income	442,290
		<b>Total Estimated Financial Resources:</b>	55,003,432

**Operation and Management**

Of the “Other Income,” approximately 17% will be used to support Central Office Cost Center operations, and the remaining 83% will be used to support public housing operations.

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

The CHA Deconcentration Policy for the Low-income Public Housing Program is set out in Section 3.3.3(c) of the Admissions and Continued Occupancy Policy and provides:

“In accordance with the Congressional mandate in the “Quality Housing and Work Responsibility Act of 1998”, the CHA has adopted the federally required policies to provide for the deconcentration of poverty and to encourage income mixing in all family developments. Although the CHA will affirmatively market its housing programs to all eligible income groups, the CHA will take appropriate actions to deconcentrate poverty and encourage income mixing developments by offering units in developments with higher average income levels to families with lower incomes, and by offering units in developments with lower average income levels to families with higher incomes.

To this end, the site-based management office may skip over families on the waiting list to reach other families with lower/higher incomes in order to comply with de-concentration requirements.

In conjunction with submission of the Annual Plan, the CHA will analyze the income levels of families residing in each development. Based on this analysis, the CHA will determine necessary marketing strategies to comply with de-concentration requirements.

The CHA may offer one or more incentives to encourage applicant families whose income classification would help to meet the deconcentration goals of a particular development. Various incentives may be used at different times, or under different conditions, but will always be provided in a consistent and in a nondiscriminatory manner.

**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.
  - X 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.
  - X 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 Implementation Grant Application**

CHA will submit a Choice Neighborhood Implementation Grant application that will include College Hill Courts in FY2024 or subsequent years.

**Mixed Finance Modernization or Development**

CHA plans to develop a CHA-owned undeveloped 3-acre tract of land on Highway 58 in Chattanooga, TN. Additionally, CHA plans to develop a CHA-owned undeveloped 22-acre tract at the Cromwell Hills Apartments in Chattanooga, TN. The plan for both parcels will be to build new affordable housing using a combination of Low Income Housing Tax Credits, Project-Based Vouchers and other 3rd party debt sources.

**Demolition and/or Disposition**

CHA has been working with partners and other stakeholders to implement the Westside Evolves Master Plan, which includes City-owned vacant land as well acquisition of land from other entities for the replacement of affordable housing. CHA intends to submit a Section 18 application for College Hill Courts in 2023 as well as a Section 18 application for Gateway Tower in 2023.

**Disposition and Acquisition of Property**

The CHA plans to investigate the acquisition of parcels of land within the City of Chattanooga for the development of additional affordable housing units. There may be land disposition of parking lots at Boynton Terrace Apartments and Dogwood Manor for future development of affordable housing under the Westside Evolves Master Plan.

For the last 15 years, CHA has entered into several low-income Housing Tax Credit (LIHTC) deals with Pennrose Development Company. At the end of the 15-year tax credit compliance periods, the tax benefits to the investors have been exhausted and CHA may exercise its rights of first refusal to acquire the properties from the investors. In 2023, the CHA may exercise its purchase options for the Villages at Alton Park (275 units), the Maple Hills Apartments (48 units), and Oaks at Camden (57 units). There is some deferred maintenance at each of these properties that CHA plans to undertake in 2023 and beyond. CHA will also consider these sites for RAD conversions in the year 2023 and beyond.

**Development # 1**

College Hill Courts	PIC ID: TN00400001	Conversion Type:	Transfer of Assistance:
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<b>Total Units: 497</b>	<b>Pre- RAD Unit Type: N/A</b>	<b>Post-RAD Unit Type: N/A</b>	<b>Capital Fund Allocation:</b>
<b>Bedroom Type</b>	<b>Number of Units</b>	<b>Family, elderly/disabled, elderly-only</b>	<b>Change in Bedroom Type and Why (if any)</b>
Studio/Efficiency	0	*	
One Bedroom	214	*	
Two Bedroom	249	*	
Three Bedroom	34	*	
If performing a Transfer of Assistance	<b>Explain any changes in the policies that govern eligibility, admission, selection, and occupancy of units at the project after it has been converted.</b>		

\*As noted above, the CHA plans to work with EJP Consulting Group, the City of Chattanooga, and the Chattanooga Design Studio to develop a plan for the demolition/disposition of College Hill Courts and Gateway Tower in phases over the next few years. This work is expected to be accomplished in conjunction with the redevelopment of the Westside District. The process has involved resident input at all stages and includes a relocation plan for residents in all phases to ensure that appropriate off-site housing or vouchers are available before relocation and/or demolition. The CHA will work with EJP Consulting Group to facilitate resident communication, to engage stakeholders and urban planners, as well as real estate developers to develop a comprehensive plan in preparation for new construction. The CHA has engaged the services of Columbia Residential from Atlanta as a Master Development. A Master Developer Agreement (MDA) is expected to be completed in 2023. Bedroom size for the new development is currently under discussion.

**Development #2**

<b>Gateway Tower</b>	<b>PIC ID: TN004000022</b>	<b>Conversion Type:</b>	<b>Transfer of Assistance:</b>
<b>Total Units: 132</b>	<b>Pre- RAD Unit Type: N/A</b>	<b>Post-RAD Unit Type: N/A</b>	<b>Capital Fund Allocation:</b>
<b>Bedroom Type</b>	<b>Number of Units</b>	<b>Family, elderly/disabled, elderly-only</b>	<b>Change in Bedroom Type and Why (if any)</b>
Studio/Efficiency	116		

One Bedroom	59		
Two Bedroom	2		
Three Bedroom	0		
If performing a Transfer of Assistance	<b>Explain any changes in the policies that govern eligibility, admission, selection, and occupancy of units at the project after it has been converted.</b>		

CHA owns and operates Gateway Tower (TN004000022) located within the Westside District footprint. CHA has been forced to take several of the units at Gateway Tower offline due to water leaks. CHA hired a consultant to perform a structural analysis of the tower to determine the reasons for the leaks and to recommend options for remediation. The consultant concluded that the leaks were caused when the structure twisted and lifted during periods of heavy rain and wind. The solutions presented to remediate the leaks are not cost-effective and are not guaranteed to address the issues. Therefore, in 2024 or later, the CHA may submit a Section 18 Demolition/Disposition application for this property. As noted earlier, in 2022 or later the CHA may also pursue Rental Assistance Demonstration opportunities at Gateway Tower, as well as a Choice Neighborhoods Implementation Grant. This work will be performed as part of the Master Development Plan for the Westside District.

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

CHA is amending its PHA plan because it was a successful applicant in the Rental Assistance Demonstration (RAD). As a result, the Chattanooga Housing Authority will be converting to Project-Based Rental Assistance under the Guidelines of H 2019-09/PIH 2019-23, Rev 4 and any successor Notices.

In 2022, CHA applied for a Commitment to Enter into Housing Assistance Payments (CHAP) to effect a RAD conversion of Greenwood Terrace Apartments (TN004000033). CHA has converted the property to Project-Based Rental Assistance (PBRA) under the guidelines of Notice H-2019-09, PIH-2019-23 (HA) REV-4, and any successor Notices. The CHA implements screening criteria as delineated in Chapter 4, "Eligibility and Suitability for Admission," of the Admissions and Continued Occupancy Policy (ACOP), attached. It is a "no debt" or "some 3rd party debt" conversion and will not involve Transfer of Assistance. The CHA has debt under an Energy Performance Contract (EPC), which was paid off prior to conversion. The unit mix will remain the same as pre-conversion and is as follows:

### Development #3

<b>Greenwood Terrace</b>	<b>PIC ID: TN004000033</b>	<b>Conversion Type:</b>	<b>Transfer of Assistance:</b>
<b>Total Units: 98</b>	<b>Pre- RAD Unit Type: N/A</b>	<b>Post-RAD Unit Type: N/A</b>	<b>Capital Fund Allocation:</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b>	<b>Number of Units Post-Conversion</b>	<b>Change in Number of Units per Bedroom Type</b>

			<b>and Why (if any)</b>
Two Bedroom	<b>58</b>		
Three Bedroom	<b>32</b>		
Four Bedroom	<b>6</b>		
Five Bedroom	<b>2</b>		
If performing a Transfer of Assistance	<b>Explain any changes in the policies that govern eligibility, admission, selection, and occupancy of units at the project after it has been converted.</b>		

In 2023 Greenwood Terrace converted to BRA. CHA adopted the residents rights, participation, waiting list, and grievance procedures listed in Section 1.7 of H 2019-09/PIH 2019-23, Rev 4; and H-2016-17/PIH-2016-17. These resident rights, participation, waiting list, and grievance procedures are appended to this Attachment. Additionally, the CHA certifies that it is currently compliant with all fair housing and civil rights requirements. RAD was designed by HUD to assist in addressing the capital needs of public housing by providing the CHA with access to private sources of capital to repair and preserve its affordable housing assets. The CHA Capital Fund Budget was reduced by its pro rata share of Public Housing Developments converted as part of the Demonstration, and this amount is estimated to be \$199,387. In addition, CHA will be contributing Capital Funds up to the amount of \$2,312,000 towards the conversion.

The CHA may apply for new CHAPs for College Hill Courts, East Lake Courts and Emma Wheeler Homes in 2024 or later. As noted above, if the CHA acquires the Villages at Alton Park, the Maple Hills Apartments, and the Oaks at Camden from Pennrose Development Company it will consider converting eligible units to PBRA through RAD conversions.

**Project-Based Vouchers**

The CHA may use its allocation of project-based vouchers to engage in new construction and/or renovation of its portfolio to facilitate the transition of the CHA’s older public housing sites into affordable housing developments, which better meets the requirement of today’s marketplace and the availability of affordable housing resources. Additionally, in 2024 the CHA will partner with private developers to build new affordable housing, using LIHTC funds and project- based vouchers.

**Units with Approved Vacancies for Modernization**

Several units at Gateway Tower, which are offline for water leakage problems, are currently in the status of “Vacant for Modernization - No Contract”. Proposed solutions and activities are described above.

**Other Capital Grant Programs**

In 2023, CHA applied for an Emergency Safety and Security Grant to expand its Real Time Information Center Equipment at the Villages at Alton Park. If funded, the CHA will implement the plan in 2023 and 2024.



### **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.

#### **Expand the Supply of Assisted Housing.**

- The CHA has made strides to reduce vacancies in its portfolio in the post-COVID environment. Vacancy rates currently range from 3% to 13%, down from an average vacancy rate of 10.7% at the start of 2022. Vacancy headwinds included difficulty in attracting maintenance personnel, supply chain challenges, and need to realign team structures to maximize productivity.
- The CHA has partnered with 4 developers to create new affordable housing in the community, which includes: Bluestone Terrace (80 family units), Espero Project (60 units of supportive housing), Shallowford Pointe (96 family units), St. Alban's Episcopal Church (66 units for seniors) and Tucker Baptist Development Corporation (63 units for seniors). Bluestone Terrace, the Espero Project and Shallowford Pointe have received LIHTC awards. St. Alban's Episcopal Church and Tucker Baptist are awaiting a decision on LIHTC awards. CHA has earmarked project-based vouchers for these developments and pending receipt of LIHTC and gap financing, construction should be underway as early as 2024.
- The CHA converted the Cromwell Hills Apartments from a 200-unit LIPH property to a 200-unit PBV property and completed a \$38M renovation using a 4% LIHTC award.
- The CHA converted its scattered sites to "Emerald Villages" from 111 LIPH property to a 111 PBRA property and completed a \$21M conversion using a 4% LIHTC award.
- The CHA has begun implementation of its Westside Evolves Plan, which includes the planned demolition of 629 units of obsolete public housing and creation of up to 1,783 new mixed income housing units. The CHA plans to apply for a HUD Choice Neighborhoods Implementation Grant and may be approved to receive TIF proceeds to support the project. In conjunction with the project's master developer, Columbia Residential, the CHA will work to assemble other funding streams to support this ambitious project.

#### **Improve the quality of assisted housing**

- The CHA expanded the responsibilities of the HCVP contract inspector in order to expedite inspection services in the HCVP.
- The CHA plans to file Section 18 applications with HUD for the demolition/disposition of College Hill Courts and Gateway Tower pursuant to the Westside Evolves Plan and will seek replacement vouchers. The CHA will develop replacement housing for the 629 units on the Westside footprint.
- The CHA has used project-based vouchers to support affordable housing development and preservation at Cromwell Hills Apartments and through collaboration with private developers as noted above.
- The CHA has converted and recapitalized LIPH units through HUD's RAD Boynton Terrace (250 units), Dogwood Manor (136 units), Mary Walker Towers (153 units), Fairmount Apartments (18 Units), Emerald Villages (formerly scattered sites) (111 units), and Greenwood Terrace (98 units).
- The CHA has partnered with Columbia Residential, a master developer firm, to lead residential development of mixed income units in conjunction with the Westside Evolves Plan.

#### **Increase Assisted Housing Choices**

- The CHA has provided voucher mobility counseling and has hired a housing navigator to assist voucher holders with housing search efforts and landlord outreach in a very tight rental market.
- The CHA has conducted outreach efforts to existing and new landlords who are willing to accept vouchers.
- The CHA has continued to provide and facilitate homeownership programming for both low-income public housing residents and HCVP participants.
- The CHA is actively working with its software provider to create portals in order to better take applications and manage site-based waiting lists and HCVP waiting lists.

### **Improve Community Quality of Life and Economic Vitality**

- The CHA has enhanced efforts to discourage and eliminate crime and security issues in the CHA communities through improved digital recording equipment, collaboration with the Chattanooga Police Department, and addition of a police officer on the CHA staff.

### **Promote Self-Sufficiency and Asset Development of Families**

- The CHA has provided supportive services to residents to enhance employability and increase financial independence through its Family Self-Sufficiency, Upward Mobility, and ROSS Programs. The CHA has partnered with organizations that can provide these types of services to CHA residents including Chattanooga State Community College, Tennessee College of Applied Technology, American Jobs Center, Operation Hope, Chattanooga Neighborhood Enterprises, Mental Health Cooperative, and Orange Grove Center.
- The CHA has provided supportive services to elderly and disabled residents that allow for independence, ability to age in place, and high quality of life. The Resident Engagement Department organized a Senior June Jam for 518 Senior households. Organizations from across the community participated including, Council for Alcohol and Drug Abuse Services, the AIM Center, Humana Health Insurance for Medicare participants, CHI Memorial Hospital, Erlanger Hospital (fall prevention), Better Fi (predatory lending counseling), Boynton Terrace and Gateway Tower Resident Councils and others. In addition to these educational offerings, food trucks provided lunch to the sound of a saxophonist; tai chi lessons, karaoke, board games, and farm produce giveaways were featured.
- The CHA has partnered with the Alexian Brothers to provide a bus to transport seniors and disabled families to local grocery stores, Walmart, and Dollar General. The bus makes two trips daily, Monday through Friday. CHA's Resident Commissioner, Jeff McClendon is the esteemed driver of the bus.

### **Financial Highlights and Conclusions from 2022 Audit:**

- **Conversion Activities:** During 2022, CHA completed the conversion of two of its Public Housing developments using HUD's Rental Assistance Demonstration program. The 250 units at Boynton Terrace and 18 units at Fairmount Apartments were converted from Public Housing to project-based voucher assistance that will allow for enhanced funding stability.
- **Greenwood Terrace:** In September 2022, CHA completed the purchase of Greenwood Terrace, a 98-unit apartment complex, from LIHTC investors. The transaction was structured as a debt-to-equity

arrangement. This strategic acquisition aligns with CHA's objectives and enhances its portfolio of affordable housing assets, contributing to its long-term mission of providing quality housing options to low-income individuals and families. See Note R in the notes to the financial statements.

- **Public Housing Program:** Had a \$4.1 million decrease in net position for the year ended December 31, 2022, as equity decreased from \$59.2M to \$55.1M. To place this number in proper context, it is important to note that this loss includes \$1.67M of depreciation expense and \$7.4M transfers of assets to Business Activities. Exclusive of these items, the program had a net operating surplus of approximately \$3.9 million for Fiscal Year 2022.
- **Housing Choice Voucher Program:** Had a \$13,485 excess of expenses over revenue during the fiscal year. The balance of HAP equity was unchanged, while the administrative portion of operations finished the year with a balance of \$1,415,310. Program funding for the year was slightly lower than last year as no CARES funding was received in 2022 and the Authority received about \$613K less in HCV HAP funding in relation to FY2021 levels.
- **Central Office Cost Center:** The net position for the COCC decreased \$139,596 (4.59%) to \$4.6 million.
- **Grant Funding:** Grant funding received in 2022 was \$43,075,589 which represents a decrease of \$1,585,403 (3.55%) from the \$44,660,992 recognized in 2021. This was due primarily to lower Capital Fund grants in relation to 2021 levels (\$970K) due to reduced public housing program unit counts after RAD conversion activities, a \$600K decrease in HCVP funding and a \$2.1M reduction in Operating Subsidy offset somewhat by a \$1.2M increase in PBRA Housing Assistance Payments Programs funding.
- **HAP Utilization:** Payments to landlords for the Housing Assistance Payments decreased from \$24,813,809 in 2021 to \$24,303,466 which represents a \$510,343 (2.06%) decrease from the prior year.
- **Business Activities:** Experienced an increase in net position from \$19,719,483 in 2021 to \$22,671,619 during 2022. This \$3 million increase was due to the activities discussed in the audit report related to Capital Improvements and the loan retirements at the Emerald Villages and Cromwell Hills communities that recently converted from Public Housing to Project-based assistance. This increase was primarily due to \$5.1M of equity transfers, and \$618K of capital contributions received during the year offset somewhat by a \$1.6M net loss from 2022 operations.
- **PBRA/MultiFamily:** experienced an increase in net position from \$28,863,175 in 2021 to \$29,283,230 during 2022. This is a relatively new cost center that consists of the four RAD conversions for Public Housing to Project-Based Assistance at Fairmount, Mary Walker, Dogwood and Boynton. This \$420,055 increase was due to \$2M of asset transfers from Public Housing during the year offset somewhat by a \$1.6M net loss (inclusive of \$2.6M of depreciation) from 2022 operations.
- **Cash & Investments:** Position decreased from \$51 million at the end of 2021 to \$37 million as of December 31, 2022. This \$14 million decrease was primarily due to the payoff of loans at Emerald and Cromwell and bond-financing activities. The change in cash position represents a 27.48% decrease in the agency's cash position in relation to 2021 levels.

B.4	<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.</p> <p style="text-align: center;">***5-Year Plan approved by HUD effective 1/1/2019</p>
B.5	<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 type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p><b>C. Other Document and/or Certification Requirements.</b></p>	
C.1	<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  x</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>
C.2	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<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>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.</p>
C.4	<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  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>

<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:
<b>D.</b>	<b>Affirmatively Furthering Fair Housing (AFFH).</b>

**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.

**Fair Housing Goal:**

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

**Expand the Supply of Assisted Housing**

**In 2022, CHA increased the number of allocated vouchers by adding 8 new Mainstream Vouchers.**

**Fair Housing Goal:**

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

**Fair Housing Goal:**

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

# 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."

**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.