

Streamlined Annual PHA Plan <i>(High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing DRAFT	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-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small 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.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, and 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: _____ Glendale Housing Authority (GHA) _____ PHA Code: <u>AZ003</u> PHA Type: <input type="checkbox"/> High Performer PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2024</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>155</u> Number of Housing Choice Vouchers (HCVs) <u>1111</u> Total Combined <u>1266</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. In addition to the items listed in this form, 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. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. 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> The draft annual plan may be reviewed in the main office at 6842 N 61st Avenue, Glendale, AZ 85301. It may also be viewed at the website: https://www.glendaleaz.com/live/city_services/citizen_assistance_programs/community_plans_reports. </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" data-bbox="167 1528 1458 1850"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>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> </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 Revision of Existing PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA since its last **Annual PHA Plan** submission?

- 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.
 - Homeownership Programs.
 - Safety and Crime Prevention.
 - Pet Policy.
 - Substantial Deviation.
 - Significant Amendment/Modification

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

Financial Resources

Financial resources have been updated with new budget numbers for the fiscal year.

Sources	Dollar Amount	Comments
Federal Grants Estimated –		
Public Housing Operating Funds	\$768,679	2024 SF-424
Public Housing Capital Fund	\$500,907	2023 Year CFP
Housing Assistance Payment	\$14,130,880	Rental Payments – 2024 Two Year Tool
Administrative Funding	\$836,724	Administrative Fee (HCV & FYI)
EHV Housing Assistance Payments	\$569,254	Rental Payments for Emergency Housing Vo
EHV Administrative Funding	\$62,000	Administrative Fee
VASH Assistance Payments	\$208,975	Rental Payments
VASH Admin Fee Funding	\$16,615	Administrative Fee
Public Housing Dwelling Rental Income	\$516,431	Public Housing Improvements & Administrat Costs -6/30/23 FDS
Other Income – City of Glendale	\$1,044,359	Administrative Costs- General Fund
Other Income	\$16,000	Administrative Costs – Fraud Recovery, PH Maintenance charges, other 6/30/23 FDS
Portability Income	\$560,311	Administering Port-in Vouchers (HAP and A
Contingency Revenue	\$926,864	Revenue Contingency for Section 8 HAP and Public Housing Subsidy
Total Resources	\$20,157,999	

Rent Determination

Payment standards are used to calculate the housing assistance payment (HAP) the Glendale Housing Authority (GHA) pays to the owners on behalf of the family leasing the unit. The level at which the payment standard amount is set directly affects the amount of subsidy a family will receive, and the amount of rent paid by program participants. Each Housing Authority must adopt a payment standard schedule that establishes voucher payment standard amounts for each FMR area. The Glendale has chosen to keep the payment standard at 110% of the HUD published Fair Market Rents (FMR).

However, Glendale is one of the Housing Authorities chosen to participate in the implementation of the Small Area Fair Market Rents (SAFMRs). The ZIP code-based fair market rents (FMRs) will be used to set payment standards, rather than a single FMR. Implementation can begin as of October 1, 2024, with a full implementation date of January 1, 2025.

Updates were made to the 2024 Admin and ACOP plans due to HOTMA regulations. The summary of changes are as follows:

Housing Choice Voucher Administrative Plan

- Chapter 4.13 Live in Aide – Definitions of Family and Household members
Live In Aide (LIA) cannot be added to household as a household member but a household member can become a Live in Aide.
- Chapter 5 Eligibility for Admission
 5. Family Assets not to exceed \$100,000 in assets (adjusted for inflation); the family has a present ownership interest ownership in real property that is suitable for occupancy by family residence.
 - 5.4.1 Information to Release Forms; HUD-9886 Authorization for release of Information/Privacy Act Notice as a condition for admission and continued assistance. HUD-9886 will remain effective until the family is denied assistance, the assistance is terminated, or the family provides written notification to GHA to revoke consent; however, revoking consent can result in termination or denial of assistance. PHA will notify the local HUD office when an applicant or participant family member revokes consent.
- Chapter 12.5.3 HUDs EIV System
The EIV System is a web-based application which provides PHA's with income and benefited information of tenants who participate in the HCV Program. PHA's are no longer required to use EIV during interim reexaminations for a streamlining process.
- Chapter 13.2.4 Decreasing the Payment Standard
The payment standard to be used as a participant housing authority for Small Area Fair Market Rents (SAFMR) will be based on bedroom size and zip code. The SFAMR Payment standard reduction will be consistent with the payment standard of the rental program.
 - 13.3.1.1 Hardships
A hardship exists in the following circumstance:
 6. When a family is unable to pay rent for the purposes of childcares
 7. Health/Medical Care Expenses & Auxiliary Care ad Apparatus expenses
Exemption for an increase in expenses.
- Chapter 16.6 Components to be reviewed/updated at Annual Reexamination
 2. For a family with net assets equal to or less than \$50,000, GHA will accept a family's self-certification declaration that household has net assets equal or less than \$50,000 without taking additional steps to verify. GHA will obtain third party verification every 3 years.
 - 16.10.2 Reexaminations Family Assets for eligibility and continued assistance.
Asset Limitation for annual reexaminations; Net family assets exceed \$100,000 (adjusted annually for inflation); and or the family has present ownership interest in and the effective legal authority to sell the property (based on laws of the state or locality in which the property is located) that is suitable for occupancy by the family as a residence.
 - F. Whenever a family member is added, GHA must obtain third party verification of that family members assets. (At the next annual reexamination of income following the addition of that family member, GHA must obtain third party verification of all family assets if the addition of that family members assets puts the family above the \$50,000 asset threshold.
- Chapter 17 Calculation Errors
 - 17.1I. Tenant Errors: A refund will be paid for the amount of the error to the effective date of the action error was made regardless of the dollar amount associated with the error (for a maximum of 12 months). The refund shall be given to the participant as soon as practical unless the tenant has an outstanding debt with GHA, in which case the debt shall be offset and satisfied in whole or in part, by the amount owed to the tenant.
 - 17.2 D Errors which are not the Fault of the Tenant
A refund will be paid for the amount of the error to the effective date of the action associated with the error regardless of the dollar amount. (For a maximum of 12 months). The refund shall be given to the participant as soon as practical unless the tenant has an outstanding debt with GHA, in which case the debt shall be offset and satisfied in whole or in part, by the amount owed to the tenant.
- Chapter 20 Termination of Assistance
 - 5.A GHA must notify their local HUD office when an applicant or participant family/household member revokes their consent (HUD 9886)

Conventional Public Housing-Admissions and Continued Occupancy Policy (ACOP)

- Chapter 9.0 Eligibility for admission
 1. To be eligible for PH Program; the family must
 - 6) Family Assets not to exceed \$100,000 in assets (adjusted annual for inflation); the family has a present ownership interest in real property that is suitable for occupancy by family as a residence.
 - 7) Family will not be admitted to any project for which they do not meet occupancy requirements.

9.20 Live in Aide
A household member can become a live in aide; a live in aide cannot become a household member.
- Chapter 11.0 Tenant Selection and Assignment Plan
 - 11.00 Live in aide
A live in aide (LIA) cannot be changed to a household member; however, a household member can be changed to a live in aide.

Chapter 13.0 Verification
13.7 Privacy Requirements
PHA's are not required to EIV during an interim reexamination
- 14.3 Minimum Rent and Hardship Exemptions (24CFR5.630)
 - 1 A hardship exists in the following circumstance:
 5. When a family is unable to pay rent for the purposes of childcare
 6. Health/Medical Care Expenses & Auxiliary Care & Auxiliary Apparatus expenses exemption for an increase in expense.

14.4 A. Section 103; Over Income Limits for Public Housing (HOTMA)
Limitations on program participation for families residing in public housing that remain over income (OI) for 24 consecutive months. After a 24-month grace period, GHA may allow OI families to continue to live in a public housing unit paying an alternative rent. GHA may terminate tenancy of the OI within 6 months of the final notification.

B. Non-public housing over income (NPHOI) family: families whose income exceeds the OI limit for 24 months and remains paying the alternative nonpublic housing rent.
 1. Must sign a NPHOI lease and are no longer public housing program participants. NPHOI families may not participate in public housing councils for low income or public housing participants. NPHOI families cannot receive a utility allowance from the PHA, be subject to income reexaminations, or be required to comply with Community Services and Self Sufficiency Requirements.

C. Alternative Non-Public Housing Rent: A remaining NPHOI family must be charged a monthly rent equal to the higher of the applicable fair market rent (24CFR888(A), or the amount of the month Subsidy provided for the unit (HUD will publish annually).
- 16.0 Recertifications
 - 16.7.1 Release and Consent:
The HUD Form 9886 will remain effective until the family is denied assistance, the assistance is terminated, or the family provides written notification to GHA to revoke consent; however revoking consent can result in termination or denial of assistance. PHA will notify the local HUD Office when an applicant or participant family revokes consent.
 - 16.7.2 Changes in income, assets, deductions, expenses and household characteristics.

Asset limitation for annual reexaminations; GHA will initiate termination of family's assistance no later than 6 months after the effective date of an annual reexamination of:
 1. Net family assets exceed \$100,000 (adjusted annually for inflation) and or
 2. The family has present ownership interest in, a legal right to reside in, a legal right to reside in and the effective legal authority to sell the real property (based on laws in the state or locality in which the property is located) that is suitable for occupancy by the family residence.
 - 16.10.4.2 Declaration of Assets
 2. The total amount of income expected from all assets must be less than or equal \$50,000. GHA will accept a family's self-certification declaration that household Has net assets equal or less than \$50,000 without taking additional steps to Verify. GHA will obtain third party verification every 3 years.
 6. Whenever a family member is added, GHA must obtain third party verification Of that family members assets. (At the next annual recertification of income following the addition of that family member, GHA must obtain third party Verification of all family assets if the addition if that family members assets puts The family above the \$50,000 asset threshold.

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

The Deconcentration Policy is described as a part of the Housing Administrative Plan and is in Chapter 7.5.7 on page 62. The Administrative plan is part of the City of Glendale's Council approval process. Resolution # is XXXXX and approved on April 9, 2024.

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.
 - Conversion of Public Housing to Tenant Based Assistance.
 - Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.
 - 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.

GHA is in consideration of repositioning two sites:

1. Lamar Homes, built in 1942 and sits on approximately 2.9 acres located at 61st Avenue and Lamar Road. There are 23 buildings and 51 units at this site, ranging in size from 530- 980 square feet. This property has 5 one bedrooms, 31 two bedrooms, 13 three bedrooms and 2 four bedrooms.
2. Glendale Homes was built in 1951 and sits on approximately 9.6 acres near 52nd Avenue and Ocotillo Road. At this location there are 35 buildings and 70 units ranging in size from 550 to 1,000 square feet. This property has 6 one bedrooms, 36 two bedrooms, 20 three bedrooms and 8 four bedrooms.

Buildings at both properties are single-story, block construction, wood framed trusses, and asphalt shingle roofs. Both housing communities have exceeded the typical life span for single family homes. Expected and useful life span of infrastructure has been far exceeded (i.e., sewer lines, potable water piping, underground electrical, underground gas lines, interior electrical and plumbing, foundations, HVAC system design, insulation, etc.). A consultant completed a Physical Condition Analysis in 2022 identifying issues and anticipated future expenses. Mounting annual capital needs for property maintenance and renovation are not met by HUD funding allocations. Property footprint/space is not efficiently utilized regarding unit density and meeting current community needs for greater numbers of 1, 3 and 4 bedrooms.

Guidelines and regulations will be met in this consideration along with GHA requesting HUD TA assistance.

B.3 Progress Report.

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.

As stated in the prior year's annual report GHA has a main goal to provide safe and affordable housing for eligible families through the Public Housing and Housing Choice Voucher programs. GHA through HUD funding can help Foster Youth kids and our Veterans through the VASH program. The VASH program is 90% leased up and the two needed to make it 100% are searching for their home. GHA will be working with the Phoenix VA Center in requesting additional VASH vouchers when the PIH notice comes out in August of 2024.

GHA continues to provide an improved living environment by using the Capital funds wisely and efficiently. Listed in Section B.4 are the projects completed for the well-being of the communities. Strategic planning takes place each year to identify the capital needs of the three properties with the consideration to resident input.

GHA is using the new THRIVE program (City of Glendale Community Services) to enhance Family Self Sufficiency in the FSS Program. The Thrive/FSS Coaches assist participants with case management, advocacy, counseling, and referrals. Educational resources including short term and technical careers with certifications are free with no cost to the participant. Assistance is given with budgeting, homeownership preparation, credit counseling, and improving their FICO score. There are several resources available in the community they are referred.

GHA has 50 FSS slots in total. Of these 50, thirty-seven are mandatory and thirteen are voluntary. As of date 48 slots have been filled. The coaches have arranged credit counseling classes. The attendees received their three credit reports and explained in detail how to read and understand their reports. They developed their action plans. Then participants attended another class in which they developed their own Vision Boards for 2024. This sharing experience will help our participants to know and understand what they want for themselves in the future and how they need to get there.

GHA always strives to do their best for their community. This hard work paid off and the GHA was awarded the HIGH Performer Status from the prior year as Standard. GHA will always strive to do the best they can for their community and their residents.

<p>B.4.</p>	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>Capital Improvements 5 Year Plan approved 5/4/2023.</p> <ul style="list-style-type: none"> • Twenty-two rental units were renovated for new tenants in 2023. • Performed safety inspections of the main electrical panels at all 155 rental units. • Replaced 64 aged main electrical panels at Glendale Homes, Lamar Homes, and Cholla Vista apartments. • Made substantive repairs to 15 electrical panels at Lamar and Glendale Homes. • Installed window security screens on 25 units at Lamar Homes (southside) and 1 at Glendale Homes • Upgraded electrical power (220 volts) to 18 units to support heat pump installations. • Completed a five-year environmental review for Glendale Homes, Lamar Homes, and Cholla Vista Apartments. • Contracted with an architectural firm to develop xeriscaping and irrigation plans for both Glendale Homes and Lamar Homes. • Installed new roofs on 54 rental units at Glendale Homes, 1 at Cholla Vista, and 1 at Lamar Homes. • Performed annual roofing maintenance work on all 155 properties. • Replaced of 18 antiquated HVAC units at Glendale Homes, Lamar Homes, and Cholla Vista over 20 years old • Installed new 4" main line water valve and new 2" backflow at Glendale Homes to improve water service reliability. • Installed new, brighter and energy efficient LED porch lights on over 57 units • Replaced 35 appliances (dryers, washing machines, refrigerators, stoves, dishwashers) at various rental units. • Replaced 15 aged water heaters at various rental units. • Replaced the kitchen cabinets and counter tops in 6 units. • Repainted parking lot markings at Lamar Homes, Glendale Homes, and Cholla Vista Apartments. • Replaced 6 corroded metal security doors and 2 metal exterior doors. • Enclosed outdoor storage area of maintenance shop to improve security and protect inventory.
<p>B.5</p>	<p>Most Recent Fiscal Year Audit.</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>C.</p>	<p>Other Document and/or Certification Requirements.</p>
<p>C.1</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input 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>C.2</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>

C.3	<p>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form 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.</p>					
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.</p> <p>(a) Did the public challenge any elements of the Plan? Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>					
<p>D. Affirmatively Furthering Fair Housing (AFFH).</p>						
D.1	<p>Affirmatively Furthering Fair Housing.</p> <p>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.</p> <table border="1" data-bbox="183 1230 1455 1881"> <tr> <td data-bbox="183 1230 1455 1272"> <p>Fair Housing Goal:</p> </td> </tr> <tr> <td data-bbox="183 1272 1455 1314"> <p><i>Describe fair housing strategies and actions to achieve the goal</i></p> </td> </tr> <tr> <td data-bbox="183 1314 1455 1356"> <p>MIXED-IMMIGRATION STATUS HOUSEHOLDS</p> </td> </tr> <tr> <td data-bbox="183 1356 1455 1440"> <p>It is the policy of GHA to ensure that steps are taken to ensure the administration of the HCV and Public Housing programs is designed to aid mixed-immigration status households in accessing services. GHA’s application process allows a person who is not applying for benefits for themselves, to be designated as a non-applicant. To be clear any adult member of a household:</p> </td> </tr> <tr> <td data-bbox="183 1440 1455 1881"> <ul style="list-style-type: none"> • May apply for benefits for themselves and for others in the household. • May apply for benefits for others in the household and not for themselves. • Only one person in the household, regardless of age, must be a U.S. citizen or a qualified immigrant to be eligible for the program. • An adult who does not claim program eligibility and is applying for benefits for others in the household will not be asked about their immigration status or whether they have a Social Security Number. </td> </tr> </table>	<p>Fair Housing Goal:</p>	<p><i>Describe fair housing strategies and actions to achieve the goal</i></p>	<p>MIXED-IMMIGRATION STATUS HOUSEHOLDS</p>	<p>It is the policy of GHA to ensure that steps are taken to ensure the administration of the HCV and Public Housing programs is designed to aid mixed-immigration status households in accessing services. GHA’s application process allows a person who is not applying for benefits for themselves, to be designated as a non-applicant. To be clear any adult member of a household:</p>	<ul style="list-style-type: none"> • May apply for benefits for themselves and for others in the household. • May apply for benefits for others in the household and not for themselves. • Only one person in the household, regardless of age, must be a U.S. citizen or a qualified immigrant to be eligible for the program. • An adult who does not claim program eligibility and is applying for benefits for others in the household will not be asked about their immigration status or whether they have a Social Security Number.
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Fair Housing Goal:**Describe fair housing strategies and actions to achieve the goal****Describe fair housing strategies and actions to achieve the goal**

GHA complies with all federal, state, and local nondiscrimination laws, and with rules and regulations governing fair housing and equal opportunity in housing, now in effect and subsequently enacted, including, but not limited to those shown in the Table below.

Title VI of the Civil Rights Act of 1964	Forbids discrimination on the basis of race, color, or national origin.
Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988)	Extends protection against discrimination based on race, color, religion, sex, national origin, handicap (disability) and familial status, and spells out forms of prohibited discrimination
Executive Order 11063; codified in 24 C.F.R. Part 107	Prohibits discrimination in federally owned or funded housing based on race, color, religion (creed), sex or national origin.
Section 504 of the Rehabilitation Act of 1973	Prohibits discrimination based on disability in all programs, services, and activities receiving federal financial assistance, requires provision of reasonable modifications and auxiliary aids and services for effective communication
The Age Discrimination Act of 1975	Prohibits discrimination based on age in programs or activities that receive federal financial assistance.
Title II of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern)	Prohibits discrimination based on disability in all programs, services, and activities of state and local government administering and operating housing program, requires provision of reasonable modifications and auxiliary aids and services for effective communication, and sets accessibility standards that apply to state and local government.
24 C.F.R. §5.105 and §5.106. Also known as the "Equal Access Rule".	Provides a determination of eligibility for housing assistance shall be made without regard to actual or perceived sexual orientation, gender identity or marital status.
Executive Order 13166	Requires that recipients of Federal financial assistance be provided meaningful access to their limited English proficiency applicants and beneficiaries.

Violence Against Women Reauthorization Act of 2013 (VAWA)	Provides housing protections for victims of domestic violence, dating violence, sexual assault, and stalking.
Fair Housing Goal:	
<p><u>Describe fair housing strategies and actions to achieve the goal</u></p> <p>NONDISCRIMINATION POLICY All housing programs administered by GHA are accessible and open to all eligible individuals. GHA does not discriminate against any person in the leasing, rental, occupancy, use, or other disposition of housing or related facilities based on race, color, religion, sex, marital or familial status, national or ethnic origin, ancestry, genetic information, age, disability, medical condition, source of income, gender identity, or sexual orientation.</p>	

Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing 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.

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.”

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. 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 maintaining 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))

Homeownership Programs. A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. (24 CFR §903.7(k)) and 24 CFR §903.12(b).

Safety and Crime Prevention (VAWA). 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))

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 or discretionary policies 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. 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. (Notice PIH 2011-47)

Mixed Finance Modernization or Development. 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

Demolition and/or Disposition. With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

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 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.](#)
- Project-Based Vouchers.** Describe any plans to use HCVs for new project-based vouchers. [\(24 CFR §983.57\(b\)\(1\)\)](#) 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.
- 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).

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.

D. Affirmatively Furthering Fair Housing.

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 by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further fair housing that require the PHA’s involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 7.02 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.